

Responses to Improving Assisted Travel consultation, published in November 2017

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Consultation Response

Office of Rail and Road: Improving Assisted Travel January 2018

About us

Action on Hearing Loss is the charity formerly known as RNID. Our vision is of a world where deafness, hearing loss and tinnitus do not limit or label people and where people value and look after their hearing. We help people confronting deafness, tinnitus and hearing loss to live the life they choose. We enable them to take control of their lives and remove the barriers in their way. We give people support and care, develop technology and treatments and campaign for equality.

Our response will focus on key issues that relate to people with hearing loss. Throughout this response we use the term 'people with hearing loss' to refer to people with all levels of hearing loss, including people who are profoundly deaf. We are happy for the details of this response to be made public.

Introduction

Action on Hearing Loss welcomes the opportunity to comment on the Office of Rail and Road's (ORR) consultation. Overall, we are pleased with the approach that ORR is taking with regard to improving Assisted Travel. There are 11 million people with hearing loss in the UK and this number is set to rise to 15.6 million by 2035. It's vital that the rail system is accessible for this large section of the population.

We would like to see the following broad points addressed to make Assisted Travel more accessible for people with hearing loss:

- **Staff training** plays an important role in creating an accessible transport system. If staff can communicate effectively with people with hearing loss, this will mitigate some of the risks and barriers that people with hearing loss can face when using transport.

- People with hearing loss are often struggling to access **real-time information**. This is because announcements are often audio only and not visual too. The need for Assisted Travel could be reduced if real-time information is improved. Our vision is for all stations and trains to have real-time information available for people with hearing loss. Ideally this would be via both screens at stations and on trains, and could include push-notifications via apps for smartphone users.

We have written responses to the consultation questions we are able to comment on.

Our response to the consultation questions

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

British Sign Language (BSL)

Based on the 2011 census, we estimate that there are at least 24,000 people across the UK who use sign language as their main language, although this is likely to be an underestimate. People who use or rely on BSL would benefit from accessing BSL video content about Assisted Travel rather than relying on written English. At a station, a help screen could be located with information in BSL. New technology has also made it easier for BSL users to access information. For example, a Signly Network Rail app enables users to point their smart phone at an image (similar to a QR code) which then activates videos in BSL (footnote 1). The app is currently used to deliver information about level-crossings, and has clear application for a wider variety of settings.

Staff promotion

As the ORR research reveals, the most popular source of information about Assisted Travel is via a member of staff (footnote 2). Although respondents were most likely to say they would prefer a leaflet or information booklet to receive information about assisted travel, if passengers are finding out about it from staff, this channel could be maximised. For example, training could include the need for staff to signpost passengers to further information about Assisted Travel, such as leaflets or websites.

In order for this method of promotion to work, staff need to effectively convey the information. And effective communication isn't always happening:

"I don't find that staff are very deaf aware. Some of them mumble or don't take care to make sure you can see their face. I recall trying to get advice from a

Footnote 1 <https://signly.co/apps/network-rail/>

Footnote 2 http://orr.gov.uk/_data/assets/pdf_file/0008/25982/research-into-passenger-awareness-of-assisted-travel-services-april-2017.pdf

staff member at Kings cross and she just kept walking and not looking at me whilst speaking. Not helpful..." (Action on Hearing Loss Supporter)

Staff can aid communication using simple techniques, such as enabling lip reading by facing the other person and not covering their mouth when speaking.

Spontaneous assistance

The information provided about Assisted Travel should make it clear that assistance does not have to be booked in advance. It is clear that more awareness raising of this information is needed: the ORR research shows that only 17% of people are aware that this method of assistance is available (footnote 3) . Spontaneous assistance is extremely relevant for people with hearing loss. If a passenger's journey goes to plan, there is no reason why a person with hearing loss, who has no additional needs, cannot travel independently. However, issues arise when there are disruptions to services, which can be frequent. It is important that assistance, in case of disruption, is given to those with hearing loss. Failure to do so can lead to frightening situations:

"While I was on my [smart] phone, I didn't realise that the people had all left the carriage... I was confused and carried on my phone, and then the door closed, and lights went out until it was pitch black and it moved against the walls. I was gob smacked. I used the emergency handles to pull, saw the message which said the driver was aware that I pulled it and there was a voice but I can't hear nor speak" (Action on Hearing Loss Supporter)

Should such disruption arise, real-time information could be posted via an app or a screen in the carriage. Alternatively, members of staff could walk up and down the carriage with tabards displaying key messages.

Q3. What steps can be taken to increase website accessibility?

Similar to our response to consultation question 1, information should be available in BSL. Based on the 2011 census, we estimate that there are at least 24,000 people across the UK who use sign language as their main language, although this is likely to be an underestimate.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We welcome the suggestion that operators should use social media to increase awareness of Assisted Travel. In addition to operators using their own social media channels and utilising social media advertising, it may be beneficial to seek out disability communities online and raise awareness via these groups.

Footnote 3 Ibid.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'oneclick' from rail operators' website home pages?

We welcome this suggestion; Assisted Travel information is often difficult to find online.

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

We very much agree with this proposal. Virgin East Line is a good example of how this can work in practice (see a screen shot of their booking system below). However, to promote the use of the service amongst people with hearing loss, we recommend that "communication support" is included in the description of journey care.

It is also important to note that some people with multiple needs may have hearing loss in addition to other visible or hidden disabilities. As with other travelers, people with multiple needs may not request assistance related to their hearing, and this might be true even if they have requested support for other conditions. For example, elderly people with mobility issues may well have some level of hearing loss (footnote 4) but may not disclose this. Support should be provided regardless, and staff should be aware that passengers with or without visible disabilities could benefit from proper communication and support.


Outward Journey

Facing	<input checked="" type="radio"/> No preference	<input type="radio"/> Backwards	<input type="radio"/> Forwards
Position	<input checked="" type="radio"/> No preference	<input type="radio"/> Aisle	<input type="radio"/> Window
Proximity	<input type="checkbox"/> Table	<input type="checkbox"/> Power	
Preferred coach	<input checked="" type="radio"/> No preference	<input type="radio"/> Quiet coach	

Save your seat preferences

Reserve seats >

Journey Care

 **Book Journey Care**

Our Journey Care team are pretty awesome. They're around to help anyone with restricted mobility or access needs, and ensure everyone's journey is as fabulous as possible.

Make a request for Journey Care +

Footnote 4 71% of over-70-year-olds have some kind of hearing loss. See our [Hearing Matter report](#) for more information.

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

We agree with the consultation that not everyone will be internet users and therefore we welcome the suggestion that offline methods of awareness raising are used. It is recommended that further research is conducted to understand who would benefit from offline materials, in order to effectively target communications. For example, studies show that people with hearing loss either have the same internet usage as the general population (footnote 5) or higher internet usage than the general population (footnote 6). Therefore it cannot be assumed that people with hearing loss are more likely to prefer offline channels than the wider population would.

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

We would welcome the opportunity to partner with rail operators. We are keen to work with operators to explore effective ways of promoting good assistive technology related to hearing loss. This could include tools that operators might develop, for example apps with push notifications or audio-visual real-time announcements on platforms and trains.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

A refund would go some way to demonstrate a commitment to providing a reliable service. However, passengers with hearing loss might be more likely to need spontaneous assistance, for example when a platform changes:

"I was once stranded at Cardiff station. It's a huge place and although I knew the time of the train there had been a change of platform. I had to go around asking station staff where the train was. By the time I found the platform I was just in time to see the back of the train disappearing round a bend. I was about 3 hours late getting home to Cornwall. Lots of stress."

Therefore operators should be held to account if an unplanned disruption takes place and suitable communication is not in place. Examples of suitable communication in this context could be available staff who are hearing loss aware who are available on the train or station or visual announcements which display details of the disruption.

Footnote 5 Thorén ES1, Oberg M, Wänström G, Andersson G, Lunner T (2013) *Internet access and use in adults with hearing loss*. J Med Internet Res. 9;15(5)

Footnote 6 https://www.sheffield.ac.uk/polopoly_fs/1.268538!/file/d-deaf_report.pdf

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

Consistency in training is easier to achieve when the same course is delivered across an organisation or industry. At Action on Hearing Loss, we have training to help organisations meet the needs of people with hearing loss. We increase service quality and customer loyalty, and help meet the requirements of the Equality Act and the public sector Equality Duty (or the Discrimination Act 1995 for Northern Ireland). Organisations who take part receive the Louder than Words™ charter (footnote 7) which signals to customers that they can approach staff of that company with confidence.

We have experience delivering training on a large scale. For example, we delivered training to 8,000 employees at TransPennine express. To deliver training to this many employees, we delivered face-to-face training to disability champions or key managers and for the remaining staff online training was given.

Q14. How frequently should disabilities training take place and its content be refreshed?

We recommend to the organisations we work with that their employees re-take our training every 12-18 months. The first training session is often face-to-face, as this is much more impactful (particularly as someone with hearing loss delivers the training). Online refresher training is then delivered after this.

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

For Action on Hearing Loss, it is important that training is delivered which is specific to those with hearing loss. Findings from our research echo findings from ORR's study, where it was found that:

"Users want staff to better understand the complexity of disabilities and appreciate challenges each person faces. Staff understanding that passengers, who are often anxious, need extra time and assurance is important. People with hidden disabilities reported lower satisfaction and poorer outcomes across a number of end-to-end metrics so this should be a particular area of focus" (footnote 8)

Anecdotal evidence from our supporters demonstrates that poor hearing loss awareness can cause disruption and distress for customers:

Footnote 7 <https://www.actiononhearingloss.org.uk/how-we-help/businesses-and-employers/access-auditing-and-benchmarking/louder-than-words-accreditation/>

Footnote 8 http://orr.gov.uk/_data/assets/pdf_file/0009/25983/research-into-passenger-experiences-of-passenger-assist-november-2017.pdf

"People can be so rude to you, they never guess you can't hear and can treat you in an awful way."

In addition to improved staff awareness, it is also important for transport providers provide accessible real-time information such as audio-visual announcements.

If the Disabled Persons Transport Advisory Committee's (DPTAC) framework is to be mandatory, we urge ORR to encourage DPTAC and the Department for Transport (DfT) to update the document, as there are elements in it which are not up-to-date: for example there is reference to out of date legislation.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

We strongly welcome an annual independent review of training and an initial benchmarking exercise. Training is a significant factor affecting how people with hearing loss receive assistance and therefore it would be beneficial to assess the training landscape and monitor this.

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

We agree with this proposed approach. It is pleasing to see that areas of technology will be updated. However, as is asserted in paragraph 1.24 in the consultation, not everyone will have access to the internet. Therefore, it will be important for the disabled people's protection policy (DPPP) guidance to ensure that stations and trains are implementing the latest technology which doesn't depend on a passenger having access to the internet. An example would be screens at stations and on trains which show real-time information.

Contact details

We would be very happy to input further into this consultation. Please do not hesitate to contact us:

Rowena Stobart
Research and Policy Officer
Action on Hearing Loss

Consultation Response

Improving Assisted Travel Office of Rail and Road

January 2018

Introduction

Age Cymru is the leading charity working to improve the lives of all older people in Wales. We believe older people should be able to lead healthy and fulfilled lives, have adequate income, access to high quality services and the opportunity to shape their own future. We seek to provide a strong voice for all older people in Wales and to raise awareness of the issues of importance to them.

We are pleased to respond to the Office of Rail and Road 'Improving Assisted Travel' consultation. Accessible transport is a vital factor in determining older people's ability to access services and communities, as many older people rely on public transport to get out and about. Without appropriate transport services and infrastructure, older people can become isolated from their community and society and unable to access essential services or participate in social activities.

Comments

Age Cymru has been involved with the Welsh Government's Accessible Transport Panel, and we would draw attention to the publication of the Welsh Government's Policy Statement – Accessible and Inclusive Public Transport Objectives.¹

We would also wish to highlight accessibility issues at railway stations and on board trains:

Accessibility problems at some railway stations include physical barriers such as stairs to platforms, a lack of lifts, and difficulties in negotiating the gap between the train and the platform edge. Such barriers in the built environment may prevent some older people from being able to use rail services. We believe that wherever feasible, lifts should be available at all stations to enable passengers to cross from one platform to another. We believe that accessible drop-off points should be available at the station entrance, and that accessible ticket purchasing facilities should be provided on all platforms for ease of access.

¹ Welsh Government (2017) Policy Statement – Accessible and Inclusive Public Transport Objectives. <https://beta.gov.wales/sites/default/files/publications/2017-12/policy-statement-accessible-and-inclusive-public-transport-objectives.pdf>

Older people who can and want to use trains require reliable rail travel supported by adequate infrastructure, including seating, shelter and accessible toilet facilities in stations.

The provision of information about public transport services should be accessible in various formats, including printed information in a sufficiently large font size. Many older people are not able to use, or do not have access to the internet, and therefore may not be able to access such information if it is provided online only. Services provided online need to be high quality and easy to use, whilst offline services should be of equal quality and fully accessible.

We believe that passengers should be kept informed and updated with reference to any rail service disruptions, and that station facilities should enable passengers to be able to wait in comfort. The impact of service disruption or poor reliability of services would be made worse by poor facilities for those waiting (e.g. no accessible toilets, not enough seating and shelter) and a lack of accessible and updated service information.

We suggest that transport providers should engage with local access groups in communities over the design of station infrastructure and the provision of facilities to ensure that stations are both accessible and inclusive. Members of local groups could be invited on site to discuss facilities needed.

It is important that staff at railway stations and on-board trains understand the needs of older passengers. Equalities training and dementia awareness training for transport providers could help to create a supportive, inclusive and accessible transport environment.

Some older people are unable to stand unaided or for long periods, hence standing on train journeys would not be an acceptable way to travel for some people. It is important that sufficient priority seating is available on all trains so that people who are unable to stand on journeys can be seated at all times during their journey.

In addition to the provision of toilet facilities at stations, we believe it is important that toilet facilities are provided on-board all train services. The provision of toilets is vital to enable older people to maintain their dignity and to be able to participate fully in public life.

We hope these comments are useful and would be happy to provide further information if required.

Response by Arriva - ORR: Improving Assisted Travel a consultation

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Chapter 1: Raising passenger awareness

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

We pride ourselves on the ability to update and print documentation, placing this in situ across our networks and stations with relative efficiency. The challenge we experience is around information around station facilities, services and rolling stock which is continually updating and evolving over time, requiring new information booklets to be produced and rendering previous editions obsolete. We of course have a duty to ensure the correct and most up to date information relayed to customers, and despite reoccurring editions of the same (albeit amended) document contributing to environmental impact - it represents a risk of unintentional misinformation to our customers. Mitigation of this risk could be via electronic information points at all stations to guarantee the most up to date information for passengers however, this doesn't redress the issue of printed forms/booklets at stations to take away. We support this approach, with the caveat that individual TOC branding and tone of voice should still be considered.

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

No.

Q3. What steps can be taken to increase website accessibility?

Rail operators can explore the remit of adding the Passenger Assistance tab on the landing homepage of their websites. General feedback from our passenger groups steers us to ensure all information relating to passenger assistance should be 'one click' from the landing page of our website. All information relating to the passenger assist service should be contained within this area where no additional navigation is required.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Our social media channels are monitored and maintained via dedicated teams based within our control and Customer Relations centres. They take a proactive approach to deal with immediate and short-term customer communications providing a vital service to both able bodied and PRM's travelling on the network. They're also responsible for periodic passenger assist information status updates - or 'tweets' – to thousands of social media followers and our train operating partners we cross network with. A focus on stakeholder relationships with third parties and local inclusivity groups could drive increased fluidity of information so that it's just no reaching customers exclusively subscribed to our social media accounts.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'oneclick' from rail operators' website home pages?

No.

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

Yes. Integrating the ticket buying process to a passenger profile held on Passenger Assist (or other system) allows for an improved booking process experienced by the passenger and more robust informational handling by TOC's. It could allow the customer to self-manage personal information relating to their travel needs and the journey they wish to take. That said, this is unlikely to be achieved with the Passenger Assist system unless investment is provided for technological advances. Program fluidity and system support to integrate with existing internal TOC

infrastructure is key to the success of this proposition. The rail industry could look towards aviation to explore the feasibility of this setting a standard within rail – each airline has its own operating system that successfully integrates with that of airport authorities and internal/external service partners with relative ease. This includes information relating to PRM's and their travel needs linked to their service/seat/airlines reservation. However, we note ticket office facilities (access to relevant network / systems), plus pressure regarding queue times may impact ability to fulfil this at stations. Changes to TVM's would also be necessary.

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

Within a substantive and comprehensive network area it is anticipated that whilst integrating third party agencies is a positive development there's a requirement to stipulate exact agencies that TOC's are required to interact with. Most TOC's will already have a network of internal and external agencies whom they work with and within an extensive network such as Northern – there's access to hundreds of agencies in the surrounding area available. This represents a resource challenge to the organisation and within a sustainable operating environment – we see this relationship through means of electronic communication via email where information can be distributed freely, efficiently and with consideration for the environment.

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

As referred to in Q7, we see this relationship progressing through the assistance of electronic means. A requirement for periodic third-party stakeholder relationship management along with a regular print of information booklets is unsustainable for us and unachievable within the resource allocation. This requires a structured approach with clear achievable objectives set by the regulator.

Chapter 2: User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

There are two strands to this question which we believe need focus, the first being Customer-facing communications and the second being the communication between TOCs/Industry.

In terms of Customer communications, there are areas where this is being done well on an individual TOC basis by creating strong partnerships with key passenger bodies and focus groups, in addition to the national campaigns which are facilitated by RDG at Industry level. However, there is more which could be done to increase awareness of the Passenger Assistance scheme and the support which is available to those customers who need help to travel independently by train. A national campaign highlighting the support available to those who need it, and the provisions available (as well as managing clear expectations to what we can offer and any potential timescales involved, especially when it relates to un-booked assistance/Turn up and Go) would address some of the gaps currently in place, in addition to a more effective and consistent industry-wide relationship with key disability/focus groups.

The more challenging element of communication is between TOCs/other Industry partners, especially when it comes to the successful delivery of passenger assistance. A core training package which could be delivered to all frontline teams responsible providing assistance (booked or un-booked), would ensure that regardless of which operator the customer is travelling with, the assistance provided would be consistent. RDG (was ATOC) produced a training package for booking assistance and so maybe there is an opportunity to do the same but for the delivery / aftercare element too. Breakdown in communication can sometimes occur as a result of the difference in technology available at each station / operator and the reliability (or accuracy) of the information being relayed. When a customer is led to believe that they will be receiving X, but instead receive Y, this can result in their confidence being impacted and their experience to become a negative one. Again, a clearly defined process, including a minimum level of detail which is to be communicated to all parties involved for the delivery of assistance, could be produced (in the same way as was done for the booking assistance programme) and would help to address this issue.

As demonstrated in the research findings, many issues which are experienced by frontline teams in relation to communication (and which impact the successful completion of assistance) are at the customers' destination station. Therefore, a more detailed review into the specifics of why these problems occur should be considered. From speaking to colleagues at the stations on our own networks, it is clear that a high proportion of 'failures' happen as a result of the un-booked assistance. Examples provided included the ability to plan for multiple arrivals within a limited time-window (especially for those stations who do not have multiple staff on duty at any one time) or whereby technology (including signal coverage/black spots) have caused delays in the messages from origin station or on-train colleagues being relayed.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

For many of the reasons detailed in Q9; we believe that a standard protocol and communications plan would have its benefits, both to manage customer expectations clearly across the industry as well as the delivery of assistance (regardless of the operator). Given that a high percentage of assistance at major stations such as Birmingham New Street is delivered by Network Rail, it is also crucial that their input and buy-in is achieved.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

We appreciate that there are occasions when the delivery of assistance does not go according to plan and the impact this can have on our customers. However, we also appreciate that no two people are the same and prefer to receive an individual response. This can sometimes include recompense in the form of compensation, however the majority prefer to have the confidence that their concerns have been addressed and to be given an assurance that remedial action has been taken to prevent a similar situation being repeated (either for themselves or others). The definition of 'Assistance' and failure (full or partial) can also vary by individual as can the implications of any problems experienced. Applying a blanket approach to the issuing of compensation against the cost of the ticket is not one which we would endorse, and if this is something which is to be considered, we would suggest a sliding scale dependent on level of failure for the affected customer.

Please note, the use of the term 'refund' indicates a point of purchase award as opposed to the operator responsible and so would suggest referring to this as compensation against the cost of the ticket unless the proposal is the aforementioned.

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

We pride ourselves on our Complaints Handling, and independent research demonstrates that we do so at a high customer satisfaction standard. Where appropriate, we offer redress to individuals as a natural part of our internal processes, however would be cautious to have thresholds or levels defined (and/or communicated publicly) as not only would this hinder our teams ability to deal with complaints on a case by case / individual basis, but may also encourage perverse behaviour which may impact other passengers who genuinely require additional assistance when travelling. It is also worth noting that some operators do not directly manage stations (and so in theory, are not responsible for delivering assistance) and so how 'blame' or responsibility to award any payment would be apportioned would also need to be considered. Network Rail, who as previously described manage assistance at many major stations, also have no form of recourse directly to passengers and so would an appropriate agreement/process would need to be implemented.

Chapter 3: Strengthening Staff Training

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

By developing a generic Disability Awareness session that new frontline staff attend on joining the business and regular refresher training as and when required.

By integrating Disability Awareness elements into ongoing development days for existing staff

All managers to receive same or variant of training (consider how many times managers travel on network, or provide support during disruption for example) to ensure consistency.

Q14. How frequently should disabilities training take place and its content be refreshed?

Frontline staff – on joining the business.

Refresher training – in our opinion once every three years to fit in with the competency cycle for frontline colleagues (or sooner if there is a developmental need).

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

Our current training modules have all the information from the framework structure.

Having a training framework would be useful as it would provide consistency across the industry. Making this mandatory would achieve this aim and deliver the answer to Q13.

Q16. Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this e.g. ORR, DPTAC etc.?

Quality assurance is incredibly useful and will provide direction and guidance for businesses delivering Disability Awareness Training.

In our opinion, any credible body within the Rail industry who has a significant interest in improving accessibility is in a position to provide the benchmark.

Chapter 4: Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Within our TOCs, we collect the data outlined in Section 4.4. We are actively seeking to improve and extend our collection of data, while recognising the importance of obtaining accurate, consistent and timely data which can be analysed in a meaningful way.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

In evaluating how to best monitor the delivery of Assisted Travel, we believe it is important to recognise the diversity and individual requirements of passengers who may require assistance. In many cases, particularly for turn up and go assistance, passengers value being able to travel as independently as possible, reaching their intended destination with the minimum level of effort or hassle. In such instances, passengers may not formally approach staff for assistance, nor see the value of the journey being formally recorded. As the rail industry seeks to improve both the awareness of Assisted Travel, and the ease of which customers receive assistance from staff, a shift in focus from recording and measuring each journey to more regular and substantive research may provide a more accurate overall assessment of Assisted Travel provision.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We believe that the RARS system currently under development with RDG will provide the most consistent and reliable data on which to base to compliance monitoring in this area. The advantages of a single system, used by across the rail industry by all frontline members of staff outweigh any benefits associated with the creation of further individual smartphone apps or such, in our view. However, consideration must also be given to those operators whose frontline teams do not have access to appropriate technology or contract terms do not include the use of this. Cost implications and franchise restrictions may impact the ability for all TOCs to agree to technological solutions.

Chapter 5: Reviewing DPPPs

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

The approach proposed is one which we support. The provision of sufficient time for TOCs to fully consider the implications of the updated guidance in the timescales for the submission of revised DPPPs will lead to a higher standard of document, which will ultimately benefit passengers.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

We agree that the removal of the requirement for the ORR to re-approve DPPPs annually will be beneficial to all, and allow more time to spent on delivering improvements for passengers. We would always advocate for a constructive engagement process between the ORR and licence holders to provide sufficient opportunity

Asperger's Voice

Responses to open consultation on Improving Assisted Travel on Railways, 2018

Meeting held on 26/01/18

Views on how passenger awareness might be increased

- The availability of assisted travel should be advertised more widely including
 - o Clear advertising of the option when a ticket is bought online, especially when bought in conjunction with a disabled person's railcard. This advertising should be clear to see.
 - o Posters at stations and on trains advertising the service, with instructions on how to access it
 - o Use of tannoy systems at stations and on trains to remind passengers about the assisted travel service
 - o A TV and radio advertising campaign about assisted travel, which would instruct people how to find out more and how to use the service
- Station staff at ticket offices should check with travellers as they buy tickets as to whether they would like assisted transport. It would be helpful for this process if their booking system displayed a prompt reminding them to do so.

User experience and what actions could be taken to improve the reliability of assistance for passengers

- Station staff are sometimes unaware of what is happening with the days regular train service, this gave members doubts about whether they would be aware of assisted travel, or instruct someone on how to book it
- Staff need to be more proactive and mindful that they may be working with people with hidden disabilities at any time
- Staff should be more proactive in looking out for signs of hidden disabilities which may indicate that travellers require assisted travel
 - o To help with this ticket sales staff could be given visual reminders at their desks/booths of key signs of hidden disabilities

How training for company staff can be strengthened

- Autism awareness training for all public facing staff
- Training in all hidden disabilities for all public facing staff

How to strengthen monitoring of assisted travel

- People who have used assisted travel should be given feedback forms after their travel date (either a physical form at the station, or an email form if booked online, or both if possible)

I have read through the documentation provided with regards to the DPPP consultation please find below the responses with regards to c2c Rail,

c2c Rail will over the life of the current franchise where practicable and possible commence works which have been planned to be come part of the Britain's accessible railway, this is part of ensuring a seamless journey can taken by someone who may need assistance at points which is currently not the case at the moment. This is subject to change this will be reviewed as changes are made no commitments can be given at this point.

One of the projects currently being watched is the Passenger Assistance Booking system (RARS), concerns are delivery of a comprehensive system which meets the needs of all and is able to deliver as currently promised. Will the timescales in place be met and does this meet all TOCs requirements and is compatible in meeting levels of delivery/ cross-industry working will assist. Additional requirements within c2c rail may not be met immediately as consultation with staff and unions will be required.

Specific Answers are:

Section 1 Q1-8 onwards: Promotional of assisted travel takes place on stations verbally by staff. DPPP booklets are available but not posters. Social media can be used to promote Passenger Assistance.

c2c Rail are seeking to improve the website included in this will be Passenger Assistance.

Passenger Assistance is promoted at third party events continuously as well as Try A Train days run in conjunction with Travel Trainers.

Q11: Refunds to unmet booked assistance is a commitment which as a policy if introduced could create levels of additional work unsustainable. Additional work is required on the idea. A preference is to possibly leave each TOC to make its own decision (which could become confusing for the customer).

Q13-16 Consistency of DPPP training can be achieved with one overall DPPP training document being produced and each TOC then allowed to make additions relevant to their route requirements. c2c Rail are conducting a complete overhaul and review of all staff DPPP training programmes this will include parts of the recommendations included in the consultation documentation. Our new staff training programme will be ready late spring and will include some parts of E-Learning involvement. This will be reviewed with staff on an annual basis.

Q17-19 Data collected is the Booked and Unbooked assistance data supplied to the ORR, this is changing over 2018.

Please contact me if you require any additional information.

Kind Regards
Suzanne Frazer
Customer Service Improvement Manager

Dear ORR

Assisted Travel Consultation

I recently read your consultation document <http://orr.gov.uk/rail/consultations/open-consultations/improving-assisted-travel-consultation> and very much welcome that you state “Our vision is to empower confident use of the railway by all”

As you are no doubt aware there are currently a number of proposals introduce Driver Only Operation on trains.

I believe that passengers deserve more than just a guaranteed driver on a train and that as a minimum there should be a fully qualified and safety critical Guard, as well as the driver. I believe it is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

I hope you will take on board my concerns and ensure that these essential staff are retained so that my family and I can have the same access to rail transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and safely.

Thanking you in anticipation



Train Day Out 19th September 2017



CILPK members went for a day out in Edinburgh on 19th September. Our members sometimes experience difficulties when booking passenger assistance on the trains and also with the assistance when at the train station so we decided to test this out and go to Edinburgh by train.

Attending

- Duncan + PA (wheelchair)
 - PA-20170914-00245
 - Wheelchair assistance booked
- Bob + PA (wheelchair)
 - Booked at train station



- Coach F Seat 99
- Lindsay + PA (Wheelchair)

- PA-20170915-00194
- coach F seat 99 and 04
- Ailie +PA (wheelchair)
 - Told there was no space left on train
 - When she asked what she should do as she had already booked the train tickets she was told that she should just turn up and hope she could get on the train.
 - She was also told that she should have booked the wheelchair space online when booking the tickets but this is not an option
- Cristina (walking assistance)
 - PA-20170915-00308
 - Mobility impaired requiring ramp
 - Told that priority seat could not be booked
- Amanda (Walker)
 - PA-20170914-00305
 - Coach F seat 78 and 77
 - Priority seat with space for walker
- Kerry – no assistance needed
- Gillian (manual wheelchair)
 - PA-20170918-00763
 - Wheelchair assistance booked
- Mel – no assistance

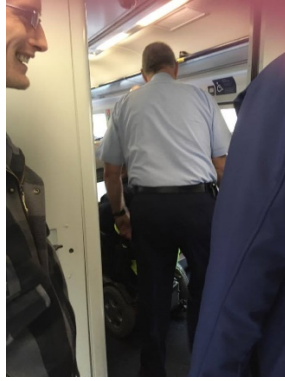
Tickets were booked for everyone on the 9.57 train to Edinburgh

Passenger assistance was booked for 7 people. 5 wheelchairs, a walker and a ramp for assistance for a lady with a stick.

On the day

There was only 2 wheelchair spaces on the 9.57 even though we had booked 4 wheelchairs through passenger assistance.

Staff at the station asked if we could move to the 10.03 where there would be room for 4 wheelchair users.



Unfortunately the staff could not remove the bike rack which meant there were only two wheelchair spaces on this train.

The 0957 train had two wheelchair users on it and a mobility walker. As you can see from the pictures there was not much room and the seats for the PA's were obstructed by the wheelchairs.



<https://www.facebook.com/cilpk/videos/1617615498301806/>

You can see from the video that other passengers coming on the train have to climb over the wheelchair user to get past.

There is nowhere for the walker to be stored so it was left obstructing the aisle.

The ramp to get onto this train was very steep and the member with the walker had to be pushed up otherwise she would not have managed to get onto the train. Staff said that the ramp was within legal requirements.

Another wheelchair user got on the train at a later stop, thankfully he managed to transfer to a seat and was able to get on the train.

The 10.03 train had more room on it for the wheelchair users



It was very tight to get on the train and into the carriage, if this train had not started in Perth we would have found it very difficult to get on in the time that it would have been stopped at the station.



There was nowhere for the manual chair to be stored so it was left in the middle of the area. The seats for the PA's were fold down and not the comfiest especially when the bike rack was still there and the manual chair was also in the space.



Not much room when the bike rack could not be removed

Toilet

The toilet was very narrow and was very difficult to close the door once in, this was with a manual wheelchair. It would have been impossible to use in an electric chair and there was no room to get a PA in.



All the doors very narrow, there was not enough room to get the manual wheelchair through the door and push the wheels at the same time. The user tried and cut her hand on the door.

Passenger Assistance met both trains in Edinburgh and helped everyone off the train. We were all taken to the passenger assistance area in the station which is a long way away from the platforms.

We had been told in Edinburgh that there would be no problem getting home as we were not all coming back together. Passenger assistance told us that the 3 wheelchair users would all get on the same train.

We had a lovely time in Edinburgh



Journey Home

When we arrived at Edinburgh station to go home it turned out there was only one wheelchair space on the train. The next train was not for another hour which was no use for our members to get home. One wheelchair user got on the train and the manual user got on and transferred to a seat. Although as you can see from the picture there was not much room on the train. The PA could not sit properly in the chair due to the lack of space.



Thankfully the train was quiet and there was very little luggage being stored so we got the manual chair in the luggage area.

The wheelchair user and his PA who did not get on the train were offered a taxi but by the time that the next train arrived an hour later the taxi had not arrived so they ended up getting on the next train.

Passenger Assistance met us in Perth and helped us off the train.

We all had a good day out but there is a lot of improvements needed to the train journey to make it more accessible and stress free.

Issues that arose:

- We managed to book 4 wheelchairs onto a train with only 2 spaces. Assistance was booked for them all including two being given the same seat number
- Why cant tickets and assistance be booked at the same time
- Different advice given by staff at the assistance line, whether priority seats and wheelchair space can be booked.
- Gradient of ramps onto the train on specific platforms

- Weight limit on ramps
- Staff not knowing which train would arrive and how many wheelchair spaces there would be
- There may already be a wheelchair user on the train and the staff would not know. Also other may get on further along the line
- Staff could not get the bike rack off the train
- This space is for 4 manual wheelchairs although this would be tight but if it was electric wheelchairs there would definitely not be enough room for 4 chairs
- Storage for manual wheelchairs and walkers
- Width of doors are very narrow
- Toilets are very small on some trains
- Lack of or conflicting information from staff
- Positions of tables reduce room even further
- Not enough space on the train for the 3 booked wheelchairs
- A taxi was not available for the wheelchair user that did not get on the train
- Some trains have no bookable seats or wheelchair spaces
- Spaces are meant for manual wheelchairs and do not take into account that electric chairs are bigger

Possible improvements

- System to book wheelchair spaces that means the space is reserved
- Fold down tables and chairs to create more room
- Better communication between staff
- Standardisation of trains
- Standardisation of toilets

Other issues we have come across on other journeys

- Assistance ramps not being at the train to help disembark
- Conflicting information about how to book assistance
- Too many different ways of booking assistance
- What happens if someone is in their priority seat
- Other luggage and pushchairs in the wheelchair area
- Refreshment trolley cannot get past wheelchairs if the space is not big enough

- Modern toilets are difficult for visually impaired people as it is not obvious where to find the braille or other instructions as to how to use the controls.
- Trains that leave before the staff start work do not have any assistance



Submission by the Chartered Institute of Logistics and Transport to the ORR Consultation: Improving Assisted Travel

The Chartered Institute of Logistics and Transport is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. This submission has been prepared by the Institute's Accessibility and Inclusion Forum.

CILT'S RESPONSE TO THE RELEVANT QUESTIONS PUT BY THE ORR

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

A simple way to do so would be to display large posters in prominent positions saying:

'Did you know you are legally entitled to free assistance when travelling, at all times trains are running, including luggage assistance, including at unstaffed stations?'

This could be backed-up by a TV advertising campaign!

NB Such an initiative is unlikely to be accepted because the TOCs are cautious of promoting Assisted Travel because they already find difficulty in delivering the services at current levels due to insufficient staff and indeed reducing staff availability at Trainside.

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

Whilst the DPPP which has to contain specific complex commitments, is usually worded very carefully in order to minimise the legal and compliance risk on the operator it is true to say The DPPP Guidance is well past its sell-by date. Therefore, to achieve this objective, ideally a requirement to Crystal Mark the DPPP would be introduced at the same time as a revised Guidance.

Updating the Guidance will be a substantial task involving significant industry consultation, and detailed legal advice. It is recognised that such a substantial legal workload is unlikely in the current Brexit arena

Q3. What steps can be taken to increase website accessibility?

There is of course an obligation on all TOCs to meet website standards.

Within the timescale it is not possible to canvas the considerable knowledge and experience within the Forum with its, for example specialist knowledge on Blind and Autistic problems. Likewise, the needs of older users with regard to simplicity of layout and speed of response time, are all relevant. Of course, consistency across the network would help.

On website design, for accessibility, the industry can learn from and adopt good practice from other sectors.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

By use of Twitter. Simply pin a Tweet to their Twitter feed which says: 'Did you know you are legally entitled to free assistance when travelling, at all times trains are running, including luggage assistance, including at unstaffed stations?'

NB

Such an initiative is unlikely to be accepted because the TOCs are cautious of promoting Assisted Travel because they already find difficulty in delivering the services at current levels due to insufficient staff and indeed reducing staff availability at Trainside.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one click' from rail operators' website home pages?

The main obstacle is that operators would find that extremely difficult because they are not resourced to deliver any increase. The whole concept of this initiative flies in the face of reality. To suggest that TOCs could offer the service at present levels of staffing would be perception rather than reality.

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

There are many barriers through no fault of Train Operators but created as technology in various aspects proceeded at different speeds and without reference to each other.

Thus, the Passenger Assist system (and predecessors) are linked to the seat reservation/ train booking system - which works OK for long-distance operators with reservable seating, but does not work well for the majority of trains which are non-reservable. For example, at East Croydon there are no reservable trains, and most people travelling towards central London do not buy a ticket as they are using contactless payment - or a Freedom Pass. This is a complex subject and the barriers to implementation will vary by operator.

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

Quite simply by the printing of more leaflets, by sending more staff to events etc.

However, because in many cases the nature of the Franchise agreement under which they operate makes it almost foolhardy to promote Assisted Travel. Simply they do not want to spend any money on this, nor would such expenditure be reasonable. Changing the "Franchise terms" is the way to make this change for the better

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

The obstacles cannot be overcome unless the operator has a dedicated management resource with the time and knowledge to engage re accessibility issues. Some operators do, but most now do not - due to often unavoidable and relentless cost cutting, essential as there is no requirement in Franchise Agreement to protect the position.

Therefore, there is support for the inclusion of appropriate requirements and incentives in franchising contracts so they have a business reason to improve services for people with disabilities beyond those justified by a commercial case

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

There could be a focus to find novel technical solutions for some of the communication requirements to arrange assistance in real time. The industry has no difficulty at all in proving 100% reliable communications between locations and/or trains - it does so with signaling and train movement generally and is indeed one of the assumptions made in the prognosis that Guards are not needed to protect the Train itself when halted for whatever reason. Therefore if that same fail-safe approach could be implemented re Assisted Travel extraordinary levels of reliability could be achieved

To achieve this, it is essential a "Rule Book" approach be applied where Assisted Travel failure is not tolerated. That of course requires minimum guaranteed staffing levels and reliable processes and equipment.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

It is certainly possible for RDG along with the RSSB to produce an industry wide protocol. However any such arrangement must be from the point of view it is good for the industry and not that this is the minimum requirement to discharge the obligations. There is the danger of what might be described as a lowest common denominator approach.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Most TOC already do this, and probably provide a greater level of compensation given the legal risk. However, as can be seen from the answers to previous questions, there is a risk that anything which increases the average cost to operators of delivering Assisted Travel will act as a further disincentive to promote it.

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

There are no legal obstacles; it is a matter of judgement as to whether different redress policies helps when the emphasis in this exercise is about industry wide standards.

Chapter three – Strengthening staff training

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

An industry wide template setting out essential training requirements and standards should be drawn up. This could be on a voluntary basis but should ideally have the force of law or other sanction behind it. An example can be drawn from the aviation industry. Regulation 1107/2006 on the rights of disabled air travellers includes a requirement that training be delivered to all customer facing staff. The detail of that training is contained in “statutory guidance “produced by the European Civil Aviation Conference (ECAC Doc 30 http://www.passepartouttraining.com/uploads/2017/01/doc-30-Part-I-December-2009_amendment-6-Dec.-2016.pdf - see Annex 5G)

Q14. How frequently should disabilities training take place and its content be refreshed?

For those indirect contact with disabled travellers, initial training must take place before they start work and be refreshed on an annual basis against an accredited standard. Content of training material should be refreshed regularly using real life case studies and customer feedback.

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

As noted above, a mandatory requirement for training which can be monitored and assessed is highly desirable. The DPTAC guidance is in need of updating (perhaps with reference to the ECAC model cited above) but would be a good starting point.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Independent verification of the quality of training would be welcome – consistency across different operators is of paramount importance to disabled and older travellers. ORR or other bodies would require training themselves to be qualified to assess the quality but that could be done. There are also independent bodies which could be brought into to do it. The assessment could be a mix of evaluation of customer satisfaction feedback and in depth checking of the content and delivery of the training programmes.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees’ activities on Assisted Travel. What further data is currently collected?

It is a regrettable fact that very little record is kept of Assisted Travel, be that journey successfully assisted or not.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

The ORR should start taking action against operators who breach their DPPP -there are no examples available to indicate whether the ORR has taken any enforcement action against operators. Examples have been given of RIVAR Regulated trains running under Driver only

operation calling at Unstaffed stations. If no action is taken, it calls into question the need for monitoring?

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term? Chapter five – Reviewing DPPPs

One approach that might succeed would be for the ORR to test proactively the robustness of an operator's DPPP, when anecdotal evidence or complaints are available that the operator is unable or unwilling to comply with regulatory or legal obligations. It has already been established in law that 'testing the system' is entirely legitimate with respect to Equality Act complaints. It would seem entirely legitimate therefore for ORR to employ disabled passengers to mystery-shop specific issues where non-compliance has been alleged, and use this evidence to take action where necessary - for example, where an operator has not employed sufficient staff to meet ramp deployment or other assistance obligations.

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

As the Government's advisers on transport accessibility, it is vital that DPTAC plays a key role in the development of new guidance, not simply as a consultee after the event.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

It is essential that the review process is not simply a tick box exercise and that it involves people with disabilities. DPTAC has a key role to play here and their involvement should carry weight with ORR.

The suggestion of scrapping an annual review in favour of self-declaration by TOCs seems to us misguided. Experience tells us that TOCs regularly depart from the terms of their DPPP and standards slip – intentionally or by default. It would be helpful to require that on an annual basis each TOC collects the views of its passengers with disabilities about the quality of services and facilities. That would provide a first hand and practical insight into their policy and practice.

Submitted by:
Daniel Parker-Klein
Head of Policy
The Chartered Institute of Logistics and Transport

January 2018

Hello,

I work with a small group of people with learning difficulties who share information across Leeds. I spent time with them, going through the Easy Read Consultation. There were 7 members at the time

They didn't answer all the questions, but –

Only 2 people were confident to get the train without being with their own staff. (everyone travels around Leeds by bus with confidence)

Only 2 people were aware of assisted travel

Everyone said they didn't understand ticket pricing

Only 1 person was confident of finding the right platform

They all said –

They would like information about assistance to be shared with user led organisations

They would like posters up at stations/ travel centres/ shopping centres etc

All the best


Sarah

Sarah Wheatley
Connect in the North

CrossCountry Trains

Response to ORR's *Improving Assisted Travel: a consultation*

Date: 25 January 2018

Part of Arriva – a  company

XC Trains Limited, Registered in England. Registered No: 04402048.
Registered Office: Arriva Plc, 1 Admiral Way, Doxford International Business Park, Sunderland, SR3 3XP

CrossCountry response to consultation: Improving Assisted Travel

Organisation: CrossCountry Trains (Train Operating Company)

Address: 18 Priory Queensway, Birmingham, B4 6BS

Contact: Emma Donnelly

Introduction:

CrossCountry is renowned for delivering great journeys right across England, Scotland and Wales. We therefore welcome the opportunity to respond to this consultation.

With a network covering over 1,400 miles and serving over 100 stations, we cross more of the country than any other train company. The CrossCountry network is the most extensive rail franchise in Great Britain, calling at more than 100 stations. We connect seven of Britain's 10 largest cities, and deliver 295 services every weekday, equating to some 35 million passenger journeys a year.

We care passionately about our customers. Whilst we are unique in that we do not directly manage any station (unlike many other operators), we are still keen to drive forward improvements for everyone. We work closely with colleagues across the Industry to ensure that all of our customers, including those who need a little extra help to make their journey, are well looked after and receive the level of service they have every right to expect.

Response to specific consultation questions

Chapter 1 Raising Passenger Awareness

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

We pride ourselves on the ability to update and print documentation, placing this in situ at stations across our expansive network, with relative efficiency. The challenge we experience is around information relating to station facilities, services and rolling stock which is continually updating and evolving over time. This requires new information booklets to be produced and rendering previous editions obsolete.

Appreciating that we have a duty to ensure the correct and most up to date information is relayed to customers, and despite reoccurring editions of the same (albeit amended) document contributing to environmental impact, it represents a risk of unintentional misinformation to our customers. Mitigation of this risk could be via electronic information points at all stations to guarantee the most up to date information for passengers however, this doesn't redress the issue of printed forms/booklets at stations to take away (unless it is agreed that this be on an 'upon request' basis).

It is also worth considering what message we want to relay on any information displayed at Stations. The proposal might be to target those who are on site (and who require assistance where they have not booked in advance), providing them with the appropriate guidance and assurance as to what is available at their local station and then encourage them to discuss their needs with a member of station staff or the Passenger Assistance care line.

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

We support this approach, with the caveat that individual TOC branding and tone of voice still be considered.

Q3. What steps can be taken to increase website accessibility?

Rail operators can explore the remit of adding the Passenger Assistance tab on the landing homepage of their websites. General feedback from our passenger groups steers us to ensure all information relating to passenger assistance should be 'one click' from the landing page of our website. All information relating to the passenger assist service should be contained within this area where no additional navigation is required.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Our social media channels are monitored and maintained by a dedicated 24/7 team based within our Control Centre. They will answer any query about Assisted Travel if approached via Twitter or Facebook; just as we do if telephoned or e-mailed. We view our social media as another way our customers can speak to us and so do not treat it any differently to other contact channels.

In addition to responding to reactive queries, they take a proactive approach to deal with immediate and short term customer communications providing a vital service to both able bodied and persons with reduced mobility (PRM's) travelling on our network. They're also

responsible for periodic passenger assist information status updates - or 'tweets' – to thousands of social media followers and our train operating partners we cross network with. A focus on stakeholder relationships with third parties and local inclusivity groups could drive increased fluidity of information so that it's just no reaching customers exclusively subscribed to our social media accounts.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one click' from rail operators' website home pages?

As a result of independent research conducted and best practice sharing, we updated our website to ensure that the Passenger Assistance information (and option to book assistance using our online form), is available within one click of our website landing page. Quick links to this area are also included in our electronic versions of our DPPP for ease of reference.

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

Yes. Indeed we already offer this when customers contact us on our dedicated Passenger Assistance or Customer Relations line, in addition to providing the option on our website.

Integrating the ticket buying process to a passenger profile held on Passenger Assist (or other system) allows for an improved booking process experienced by the passenger and more robust informational handling by TOC's. It could allow the customer to self-manage personal information relating to their travel needs and the journey they wish to take. That said, this is unlikely to be achieved with the Passenger Assist system unless investment is provided for technological advances. It is also worth noting that third party retailers such as Trainline, Red Spotted Hanky etc. would also need to offer this if consistency were to be achieved.

Program fluidity and system support to integrate with existing internal TOC infrastructure (and third party retailing platforms) is key to the success of this proposition. The rail industry could look towards aviation to explore the feasibility of this setting a standard within rail – each airline has its own operating system that successfully integrates with that of airport authorities and internal/external service partners with relative ease. This includes information relating to PRM's and their travel needs linked to their service/seat/airlines reservation. It is also worth noting that there are variances to the facilities available at many ticket offices across the country (access to relevant network / systems), plus pressure regarding queue times may impact ability to fulfil this at stations, given an assistance booking takes an average of 10-15 minutes handling time per request. Changes to TVM's would also be necessary.

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

Within a substantive and comprehensive network area it is anticipated that whilst integrating third party agencies is a positive development there's a requirement to stipulate exact agencies that TOC's are required to interact with. Most TOC's will already have a network of internal and external agencies whom they work with and within an extensive network such as CrossCountry, there is access to hundreds of agencies in the surrounding areas available. This may represent a resource challenge to some organisations and within a sustainable operating environment, we would envisage that this relationship be through

means of electronic communication, where information can be distributed freely, efficiently and with consideration for the environment.

We also believe that obtaining information and providing a service should be a Licence condition when the third party agent is licenced by RDG. It should not be for individual operators or the industry to subsidise these businesses, they should enter the market with clear obligations to all customers, irrespective of their journey provider.

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

As referred to in Q7, we see this relationship progressing through the assistance of electronic means. Research has shown that many passengers now prefer to engage using these channels. If third party agencies are disability groups and the like, we should provide as much support as possible to integrate their needs, offering all the help we can, whilst encouraging RDG to do so too.

A requirement for periodic third party stakeholder relationship management along with a regular print of information booklets is unsustainable for us and unachievable within the resource allocation. This requires a structured approach with clear achievable objectives set by the regulator.

Chapter 2 User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

There are two strands to this question which we believe need focus, the first being Customer-facing communications and the second being the communication between TOCs/Industry.

In terms of Customer communications, there are areas where this is being done well on an individual TOC basis by creating strong partnerships with key passenger bodies and focus groups, in addition to the national campaigns which are facilitated by RDG at Industry level. However, there is more which could be done to increase awareness of the Passenger Assistance scheme and the support which is available to those customers who need help to travel independently by train. A national campaign highlighting the support available to those who need it, and the provisions available (as well as managing clear expectations to what we can offer and any potential timescales involved, especially when it relates to un-booked assistance/Turn up and Go) would address some of the gaps currently in place, in addition to a more effective and consistent industry-wide relationship with key disability/focus groups.

The more challenging element of communication is between TOCs/other Industry partners, especially when it comes to the successful delivery of passenger assistance. A core training package which could be delivered to all frontline teams responsible providing assistance (booked or un-booked), would ensure that regardless of which operator the customer is travelling with, the assistance provided would be consistent. RDG (was ATOC) produced a training package for booking assistance and so maybe there is an opportunity to do the same but for the delivery / aftercare element too. Breakdown in communication can sometimes occur as a result of the difference in technology available at each station / operator and the reliability (or accuracy) of the information being relayed. When a customer is lead to believe that they will be receiving X, but instead receive Y, this can result in their confidence being impacted and their experience to become a negative one. Again, a clearly defined process, including a minimum level of detail which is to communicated to all parties involved for the delivery of assistance, could be produced (in the same way as was done for the booking assistance program) and would help to address this issue.

As demonstrated in the research findings, many issues which are experienced by frontline teams in relation to communication (and which impact the successful completion of assistance) are at the customers' destination station. Therefore a more detailed review into the specifics of why these problems occur should be considered. From speaking to colleagues at the stations on our own networks, it is clear that a high proportion of 'failures' happen as a result of the un-booked assistance. Examples provided included the ability to plan for multiple arrivals within a limited time-window (especially for those stations who do not have multiple staff on duty at any one time) or whereby technology (including signal coverage/black spots) have caused delays in the messages from origin station or on-train colleagues being relayed.

Another suggestion would be to see if there is good practice in other travel businesses such as airlines, coach networks, airports, etc. in order to drive a consistent approach. This is particularly relevant to those customers making multi-modal journeys.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

For many of the reasons detailed in Q9; we believe that a standard protocol and

communications plan would have its benefits, both to manage customer expectations clearly across the industry as well as the delivery of assistance (regardless of the operator). Our suggestion would be to really understand how far away from that we are today and then agree a protocol which would address the failures which have been identified.

Given that a high percentage of assistance at major stations such as Birmingham New Street is delivered by Network Rail, it is also crucial that their input and buy-in is achieved.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

We appreciate that there are occasions when the delivery of assistance does not go according to plan and the impact this can have on our customers. However, we also appreciate that no two people are the same and prefer to receive an individual response. This can sometimes include recompense in the form of compensation, however the majority prefer to have the confidence that their concerns have been addressed and to be given an assurance that remedial action has been taken to prevent a similar situation being repeated (either for themselves or others). The definition of 'Assistance' and failure (full or partial) can also vary by individual as can the implications of any problems experienced. Applying a blanket approach to the issuing of compensation against the cost of the ticket is not one which we would endorse, and if this is something which is to be considered, we would suggest a sliding scale dependent on level of failure for the affected customer.

Please note, the use of the term 'refund' indicates a point of purchase award as opposed to the operator responsible and so would suggest referring to this as compensation against the cost of the ticket unless the proposal is the aforementioned.

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

We pride ourselves on our Complaints Handling, and independent research demonstrates that we do so at a high customer satisfaction standard. Where appropriate, we offer redress to individuals as a natural part of our internal processes, however would be cautious to have thresholds or levels defined (and/or communicated publicly) as not only would this hinder our teams ability to deal with complaints on a case by case / individual basis, but may also encourage perverse behaviour which may impact other passengers who genuinely require additional assistance when travelling.

It is also worth noting that some operators do not directly manage stations (and so in theory, are not responsible for delivering assistance) and so whose responsibility to award any payment or how this would be apportioned also needs to be considered. Network Rail, who as previously described manage assistance at many major stations, also have no form of recourse directly to passengers and so would an appropriate agreement/process would need to be implemented.

Chapter 3 User experience; improving the reliability of communications

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

Consistency is a key element in order to increase customer confidence in the delivery of Passenger Assistance. Our suggestion would be to consider Equality, Diversity and Inclusion (EDI) training as opposed to 'Disability training' as assistance covers a wide array of needs, not always solely related to a 'disability' in the typical sense. This has been implemented at CrossCountry (a separate module used to complement our Disability Awareness Course), and has proved to be very successful and well received by colleagues from across the business and customers alike.

By developing a generic session that all new frontline staff attend on joining the organisation and regular refresher training at agreed intervals, a more joined up and consistent approach would be achieved. Given the complex nature of the network, and our ability as an industry to support each other (especially times of disruption), it is also important that all operators integrate Disability Awareness elements into ongoing development days for all existing staff. Independent assessments/monitoring of the effectiveness of the course material and the delivery to the end user would also ensure that consistency is achieved.

Q14. How frequently should disabilities training take place and its content be refreshed?

All new employees should receive EDI training upon joining their respective TOC, with additional training for those frontline colleagues and managers on the practical delivery of assistance. Refresher training, no less than every three years to fit in with the competency cycle for frontline colleagues, should be included (or sooner if there is a developmental need).

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

Our current training module has all the information from the DPTAC framework structure and also includes additional enhancements following feedback from our frontline colleagues and managers.

By having a training framework which is used right across the industry (for all operators and those responsible for delivering assistance), it would provide consistency across the entire network. We are happy to adopt good practice and be judged by it but do not believe that this needs to be mandatory.

Q16. Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this e.g. ORR, DPTAC etc.?

Quality assurance is incredibly useful and will provide direction and guidance for businesses delivering Disability Awareness Training. In our opinion, any credible body within the Rail industry who has a significant interest in improving accessibility and who has a good understanding of the challenges faced by all involved, is in a position to provide the benchmark, however additional costs to individual TOCs should be avoided.

Chapter 4 Strengthening Monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Within our TOCs, we collect the data outlined in Section 4.4. We are actively seeking to improve and extend our collection of data, while recognising the importance of obtaining accurate, consistent and timely data which can be analysed in a meaningful way.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

In evaluating how to best monitor the delivery of Assisted Travel, we believe it is important to recognise the diversity and individual requirements of passengers who may require assistance. In many cases, particularly for 'turn up and go' assistance, passengers value being able to travel as independently as possible, reaching their intended destination with the minimum level of effort or hassle. In such instances, passengers may not formally approach staff for help, nor see the value of the journey being formally recorded. As the rail industry seeks to improve both the awareness of Assisted Travel, and the ease of which customers receive assistance from staff, a shift in focus from recording and measuring each journey to more regular and substantive research may provide a more accurate overall assessment of Assisted Travel provision.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We believe that the RARS system currently under development with RDG will provide the most consistent and reliable data on which to base to compliance monitoring in this area. The advantages of a single system, used by across the rail industry by all frontline members of staff outweigh any benefits associated with the creation of further individual smartphone apps or such, in our view.

Consideration must be given to those operators whose frontline teams do not have access to appropriate technology or contract terms do not include the use of this. Cost implications and franchise restrictions may impact the ability for all TOCs to agree to technological solutions.

Chapter five – Reviewing DPPP’s

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

The approach proposed is one which we support. The provision of sufficient time for TOCs to fully consider the implications of the updated guidance in the timescales for the submission of revised DPPP’s will lead to a higher standard of document, which will ultimately benefit passengers.

Q21. Do you agree with our proposed approach to reviewing DPPP’s?

We agree that the removal of the requirement for the ORR to re-approve DPPP’s annually will be beneficial to all, and allow more time to spend on delivering improvements for passengers. We would always advocate for a constructive engagement process between the ORR and licence holders to provide sufficient opportunity for TOCs to deliver improvements for passengers.



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23 January 2018

Dear ORR Consumer Policy Team,

DfT response to 'Improving Assisted Travel' consultation

Many thanks for the opportunity to comment on the ORR's 'Improving Assisted Travel' consultation. I am responding on behalf of the Department for Transport ("DfT").

DfT welcomes the publication of the three important pieces of work which have led up to this consultation, and is supportive of the findings. DfT is also grateful for the cooperation of the rail industry in the delivery of the research.

It is a key DfT priority to provide everyone with the same opportunity to access public transport, regardless of disability or other access requirements and we share ORR's vision of a railway that can confidently be used by all. We recognise the important role which the ORR plays in that objective; through holding train operators to account for the way in which they meet their license obligations through their Disabled Persons Protection Policies and through monitoring and enforcement of the requirements set out in the Design Standards for Accessible Railway Stations. As the Secretary of State set out in his written guidance to the ORR in July 2017, he wishes the ORR to maximise its role, with the ORR playing an active role in improving accessibility and supporting vulnerable customers.

Building on this, DfT notes recent developments, both actual and potential, in devolution that will be of relevance to the ORR's consideration. These developments include, but are not necessarily limited to:

- the transfer of London area / Thames Valley stations to MTR Crossrail;

- the devolution of Scottish and Welsh services;
- regional arrangements for Northern, TransPennine Express and the West Midlands;
- concessioning of Merseyrail, Crossrail and former train operating company routes to London Overground;
- transfer of Tyne and Wear metro services to Sunderland; and
- open access services.

These will require ORR to cover all train operators equally to ensure that accessibility is assured across the network below in a way that could not be replicated through Department for Transport franchising; irrespective of how the underlying funding is provided.

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

Q1: In line with their duties under the Equality Act 2010, DfT expects train operators to promote Assisted Travel information in a variety of ways, and to ensure that this promotion is reaching the intended target audience, which should include potential passengers who are not aware of the assistance options available to them.

Where evidence is presented which demonstrates that a train operator is not meeting its DPPP obligations in respect of provision of Assisted Travel information, DfT would expect ORR to consider the remedial options available to it using all of its powers to hold industry to account for its obligations to passengers under licences and consumer law. An important aspect of this could be increasing transparency, including examples of both good and bad practice to drive change. For its part, DfT will continue to monitor all relevant franchise agreement provisions to ensure that these are being met, and will take action where potential breaches are detected.

Q2: DfT agrees that it is appropriate for DPPPs and other passenger-facing documents to meet the standard required to attain a Crystal Mark from the Plain English Campaign.

Q3: The government has set out the standard¹ required for digital services to be considered 'accessible' and would expect all train operators to meet their legal duty under the Equality Act 2010 by ensuring that their websites meet this standard. DfT suggests that, as part of its monitoring, ORR reviews the extent to which train operators are compliant with these standards, reporting on these in its Annual Consumer report. DfT notes that the Rail Delivery Group ("RDG") has committed to a regular review of train operating company

¹ <https://www.gov.uk/service-manual/helping-people-to-use-your-service/making-your-service-accessible-an-introduction>

websites as a results of the Action Plan for information on fares and ticketing².

Q4: As part of its strategy for engaging with customers, DfT expects train operators to advertise services, facilities and products available to passengers through all appropriate channels of communication, including social media, in a manner that effectively promotes these services. DfT suggests that ORR and the industry could usefully engage with customers of mobility assistance schemes, representative organisations and disability charities to obtain advice on how best to use social media to meet this objective. From its consideration of the responses to its Accessibility Action Plan ("AAP") consultation, DfT notes that awareness of the available assistance options is comparatively low; a conclusion supported by ORR's extensive research.

Q5: DfT considers that train operators are better placed to comment on the websites which they operate; however DfT supports all steps taken to improve the accessibility and navigability of train operator websites, improving required compliance with online accessibility standards (please see the response to question 3). In particular, we consider that 'one click' options are important and should be the norm, absent strong justification.

Q6: The DfT is fully supportive of the introduction of a system which allows passengers requiring both a ticket and assistance to book these in the same transaction. Whilst there might be shorter-term barriers to achieving this, these should not prove insurmountable.

Q7: DfT agrees with the ORR's suggestion of better partnership arrangements between train operators and interest groups, charities and representative bodies. DfT considers that greater use could be made of placing literature in community hubs and other public buildings such as hospitals (including mental health hospitals), GP surgeries, libraries, pubs, citizens' advice centres and any other appropriate venues where they are more likely to be accessed by those who require the information. This could also be supplemented by various 'print on demand' accessible versions on train operator websites.

Q8: DfT does not consider that there are any barriers to train operators forging better links with the organisations listed in response to question 7. Train operators are best placed to determine how to engage with passengers and potential passengers and DfT expects that train operators should proactively do so as part of their commitment to providing excellent customer service.

² <https://www.gov.uk/government/publications/action-plan-for-information-on-rail-fares-and-ticketing>

Q9: DfT agrees that communication between passenger and train operator on assistance bookings should be seamless, reliable and facilitate journeys which meet passengers' expectations. The format of this communication should also be in an appropriate medium; noting that 'app'-based technology may not suit all those with additional accessibility requirements. DfT is in favour of a uniform, cross-operator approach to handling communications, to ensure that passengers are not required to use different systems or methods to seek the information and help which they may require, by virtue of travelling across multiple train operators. DfT also notes that train operators have licensing obligations in respect of Passenger Information During Disruption and invites the ORR to consider whether greater monitoring and, if appropriate, stronger action in relation to this obligation, including enforcement, would assist in improving the reliability of communications for all passengers.

Q10: DfT has no further comments to add to its response to question 9, and will note the RDG response with interest.

Q11: DfT expects train operators to comply with their duties under the Consumer Rights Act and other applicable legislation in respect of all passengers. DfT believes that there is merit in the introduction of a refund scheme in the event of a failure of booked assistance and would welcome further discussions with train operators who may wish to adopt this commitment. Separately, DfT will consider making such a scheme mandatory as part of the franchising competition process. DfT also notes that the forthcoming rail ombudsman, when established, will play an important role in giving passengers redress when problems occur, including in relation to the provision of assistance and access to advertised services and/or facilities. We welcome the ORR's support for this scheme, including the recent consultation on Complaints Handling Procedures and look forward to continuing to work with the ORR to establish an effective, independent and passenger-focussed ombudsman.

Q12: There are no obstacles to train operators introducing such schemes under their passenger charter or other similar mechanism, and we would welcome discussions with any train operators who may wish to introduce such a scheme. DfT would need to consider the wider implications of mandating a wider redress policy through extant franchise agreements. That said, DfT is strongly of the view that a consistent industry scheme would be preferable to individual operators introducing schemes and would be open to discussions with the RDG on this point.

Q13: DfT believes that the RDG should lead on ensuring that its members adopt a consistent, robust and effective approach to staff training, across train operators and Network Rail, which addresses current gaps (e.g. around awareness and support of hidden disabilities). Training must emphasise the importance of compassion and empathy as much as increasing the factual

knowledge and skills of staff. DfT's recent consultation on the AAP highlighted a significant concern about the consistency and standard of staff training and we are keen to see this addressed.

Q14: DfT has no wish to propose a frequency for staff training, as the focus should be on achieving a positive outcome for passengers who require assistance rather than specifying an arbitrary input.

Q15: DfT does not disagree with making any appropriate publication, including the DPTAC training framework, a mandatory element of DPPP guidance if there are beneficial effects of doing so. It is important that training is consistent, and consistently applied, and takes account of a wide range of accessibility requirements. DfT would add that such measures are generally only successful if they are subject to appropriate monitoring and enforcement.

Q16: DfT questions the value of a benchmarking exercise, and how the results of such an exercise would be used. Will ORR use the results to inform on monitoring and/or enforcement. DfT considers that the data from ORR's three items of research on which this consultation is based, could be used at an aggregated TOC level (where available) to act as a proxy for a benchmarking exercise.

Q17: By virtue of paragraph 12.1(b) of Schedule 7.2 of the DfT baseline franchise agreement, train operating companies must publish *'performance by reference to such benchmarks as may be agreed between the Franchisee and the ORR as part of the Franchisee's DPPP in respect of the Passenger Assistance service operated by the Franchisee'*. DfT considers that this provides the opportunity for the ORR to collect whatever data it may find useful, including information on successful completions and failed Passenger Assist bookings. DfT considers that there may be a role to play for ORR in coordinating and collating cross-industry complaints data (incorporating the relevant data protection requirements) from organisations such as Transport Focus and London Travelwatch.

Q18: In responding to this question, DfT would, as mentioned above, draw attention to the guidance issued by the Secretary of State to the ORR; in particular paragraphs 5 and 6 which state:

"5. The Secretary of State wishes ORR to use its powers to hold the industry to account for its obligations to passengers under licences and wider consumer law. He welcomes ORR's annual "Measuring Up" report as a means of monitoring, communicating and incentivising the industry's performance in key consumer interest areas. He wishes ORR to continue to develop this approach to further improve industry accountability and transparency about how the regulatory process is leading to better outcomes for consumers, where appropriate working with franchising authorities.

6. ...He also wishes ORR to play an active role in improving accessibility, supporting vulnerable consumers and improving passenger communication, particularly during periods of disruption.”

DfT believes that this clearly sets out the Secretary of State's expectations and looks to ORR to use the full range of its regulatory powers in support of its monitoring duties.

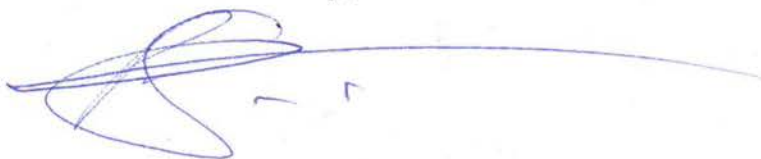
Q19: DfT is willing to share complaint and correspondence data which it has received (when suitably anonymised to ensure compliance with the Data Protection Act 1998) if this would be helpful in informing on the ORR's monitoring activities. Highlighting examples of both good and bad practice, providing a strong reputational push to action, can be a particularly important and effective tool, and we would encourage the ORR to make maximum use of it.

Q20: DfT is fully supportive of a review of the DPPP guidance and notes that, whilst the guidance was initially produced by DfT in 2009, no update has occurred since the transfer of DPPP responsibilities to the ORR in 2013. In the intervening period, societal and medical understanding of and attitudes towards disability have changed markedly and, as well as the areas for inclusion identified in the consultation document, consideration should be given to ensuring that DPPPs take account of the incidence and nature of disability (e.g. take account of the incidence and nature of disability, including the increased awareness and understanding of hidden disabilities, which include mental health difficulties, autism and dementia) as it is understood today.

Q21: DfT agrees that it is sensible to review DPPPs only when material changes are made, rather than on an arbitrary annual basis. DfT also notes ORR's resolution to proactively monitor DPPP implementation and compliance outside of this annual cycle, and welcomes this approach. DfT would also welcome the introduction of a 'template' or 'model' DPPP to promote greater consistency across train operators of the format and content of their DPPPs. There is a wide variety in the level of detail, structure and content of DPPPs and DfT considers that there is the potential for confusion amongst passengers using multiple operators to undertake journeys. DfT is also aware that ORR has been working with the Disabled Persons Transport Advisory Committee and Transport Focus to produce a 'universal' DPPP which summarises obligations and responsibilities that are common to all operators to provide greater certainty to passengers. DfT notes that the current Passenger Rights Obligations mandatory articles for disability are in place and that these would need to be reflected in any updated DPPP guidance. DfT would welcome publication of the 'universal' DPPP, in a variety of accessible formats, in support of this revised approach.

No part of this response should be considered confidential. Thank you again for the opportunity to respond to this important consultation. The DfT continues to support an active role by the ORR in relation to improving assisted travel, helping to ensure that the railway delivers for all of its passengers.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Paul Stone

Please find below my response to the consultation on assisted travel. I am a wheelchair user and regular user of assisted travel. I have only answered those questions where I had specific feedback, I have also included an additional feedback section on the points which I felt had not been addressed.

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

A fixed sign outside on the platform directing people to where they can find the information would be useful. I very rarely wait where the leaflets are displayed.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Videos showing passengers using assisted travel would be useful to see how things work in practice. Also showing staff providing the assistance and how it works from their perspective

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

Yes this would make things a lot easier and would mean that people do not forget to make the assisted travel booking. There is a question of how this would work if you book the tickets shortly before travel where there is not enough time to process the assisted travel booking.

Q9. How might the reliability of communications be improved?

It would be helpful if passengers could communicate directly with stations to ensure that a ramp will be provided. I am also unclear who I should communicate with if my plans change or if there is a delay, and whether I should call the assisted travel line again. In terms of communications more generally it is very important that staff providing assistance make direct contact with passengers - e.g. when I get on a train in London and am relying on a member of staff helping me to alight in Shoreham, it is helpful if they can speak to me as soon as possible. Often I don't find out whether anyone is on the train to help me until I arrive at my station, even though they have been on the train somewhere for the last hour. That causes unnecessary worry

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes this would be very helpful and might provide a greater incentive for assistance to be provided reliably. There would need to be a clear way of proving that assistance was not provided.

Additional feedback

In making passengers more aware of assisted travel, it would be helpful if there is clarity on some key questions such as:

- On driver only trains, how is assistance provided at unstaffed stations?
- How do assisted travel requests get acted on when stations are unstaffed?
- How do you know whether an on-board supervisor will be available on a train to help you to alight?
- What are the rights of passengers where assisted travel hasn't been booked?

As a general point of feedback, the best solution to assisted travel for individuals able to navigate independently is for platform heights to be raised, train heights to be lowered, or ramps to be automated (i.e. to extend from the train itself) to enable step free access onto the train. This will eliminate the need for a ramp to be provided. More research should be done to identify the feasibility of doing this, including measures such as reserving specific platforms for specific types of trains.

There is a major concern that the introduction of driver only trains will prevent disabled people who need ramp assistance from alighting at unstaffed stations. Although taxi provision is often used as a substitute for providing a ramp at unstaffed stations, many wheelchair accessible taxis are not suitable for some wheelchairs due to the lack of sufficient headroom or steepness of ramps. They are not a consistent and reliable alternative for assistance boarding and alighting a train.

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31st January 2018

DPTAC response to ORR consultation: “Improving Assisted Travel”.

Introduction Statement

Disability affects some 13 million people in the UK. It includes those with visible physical or sensory impairments as well as non-visible disabilities including hearing loss, low or restricted vision, mental health conditions, autism and learning disabilities. For many people a lack of mobility or confidence in using the national rail system, as well as other modes of transport, is a barrier to accessing employment, education, health care, broader commercial opportunities (e.g., shopping), and a social life.

In this context, the Equality Act 2010 was introduced with a key aim to ensure that discrimination, harassment and victimisation of disabled people (in addition to other people identified as belonging to a Protected Characteristic as detailed in the Act) is eliminated. The Equality Act 2010 also requires a robust approach to be taken to advance equality of opportunity and foster good relations for disabled people under the Public Sector Equality Duty.

We welcome the opportunity to respond to ORR’s *Improving Assisted Travel* consultation and to offer a range of options for consideration to support ORR and other rail sector stakeholders (for example, DfT, rail operators and Rail Delivery Group) to consider new and innovative ways to improve the rail journey experience of disabled customers.

We would welcome the opportunity to discuss the outcome of this consultation, and to further explore with ORR and other industry stakeholders ways to improve Assisted Travel options for disabled passengers.

Chapter one - Raising passenger awareness

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

There needs to be an environment in which rail operators actively commit to promoting Assisted Travel. An argument could be made that rail operators may be wary of this due to current or future resource constraints. For example, we are aware of one operator where only a very small proportion of the many stations it operates are fully-staffed. That operator currently appears to be considering the removal of on-train staff. Using this example, it would be challenging to launch a campaign that promotes the availability of Assisted Travel at the same time as operators are removing their capability to deliver this service.

In terms of a way forward, we believe the following areas may be of use in helping raise passenger awareness of Assisted Travel options:

- Periodic marketing and information campaigns in stations, perhaps using pull up banners, information on screens, leaflets in more accessible places away from ticket offices, for example, on station platforms, in lifts, stairway and on escalator walls;
- Promote via messages on CIS screens;
- Passenger seating / priority seating areas could offer a means to promote Assisted Travel as some passengers may need a seat when making a journey by rail but are unaware that they can request support;
- Promote in locations in the vicinity of stations, as appropriate, for example at taxi ranks and bus stops;
- Promote with local and national disability groups; and
- Promote with posters on station platforms and in the public areas of station buildings.

In addition to the suggestions above, an important approach would be to develop a broader marketing campaign outside of the station environment. This could include for example, GP surgeries, hospitals (including mental health establishments), shopping centres, media sources such as newspapers and radio, and other public buildings.

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

No. We recognise that this could be a particular challenge with DPPP's as these have to contain complex and very specific commitments, and are usually worded very precisely in order to ensure compliance with legal and regulatory requirements. However, it is desirable to ensure that all passenger-facing documents are clear and understandable and, whatever the perceived challenges, this should be a key goal. The Crystal Mark delivers that clarity.

We believe that if there is an opportunity to update the outdated DPPP Guidance following the conclusion of this consultation, then a potential requirement to Crystal Mark DPPP's should be considered as part of this review.

DPTAC, ORR and Transport Focus have been working since 2015 to produce a user-facing version of a "universal" DPPP – a simple, one-page statement. A final version of this was cleared by ORR's legal team some time ago. We are keen to

work with ORR and Transport Focus to finalise this important document and ensure it is published as soon as possible.

Q3. What steps can be taken to increase website accessibility?

We note that the *Measuring Up* report (2017) detailed the outcome of how well current rail operators' websites meet the communication needs of people with a range of impairments in terms of technical accessibility and usability.

It would be useful to use this report as a baseline to define and design a common operating platform in the form of a 'website design code' to establish an industry standard and requirement. Following on from this point, it may be useful to consider publishing supporting best practice guidance to help rail operators understand the principles of how best to meet disabled passengers needs in this context. We also recognise that technology is constantly evolving and providing new opportunities, so any guidelines would need to be actively managed and updated. A question does however arise in terms of which body would be best placed to take on ownership of such a code.

Consistency is important, and accessibility guidelines already exist. However, websites need to take account of a number of other factors, for example, compatibility with assistive technology via Smartphones.

Real time user testing is also crucially important when developing / upgrading a website as opposed to customer user groups testing it immediately before it goes live.

In addition we believe that it would be useful to consider undertaking the following as part of a targeted programme of work to increase website accessibility:

- Work with a range of disability groups, and individuals who have technical and user-led expertise and experience to help develop practical solutions to issues currently known to exist;
- Review web based processes, for example when booking a first class ticket with a Disabled Persons Railcard, it would be useful to flag up prior to the point of purchase if some first class carriages don't currently meet RVAR PRM-TSI compliance standards;
- Offer workshops for people who have difficulty accessing the websites. For example, this could include learning about processes for booking tickets, options for booking assistance, and how to explore journey information etc. This could be developed in partnership with charities / local disability groups.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We agree with the points made in the consultation document that not everyone uses social media, therefore we caution against over-reliance on this means of communication. It is important to note that social media cannot replace other methods of communication and should be used as one option to promote information and messages in conjunction with other communication means.

A further point for consideration here is whether social media communications are best undertaken at an individual Operator / Network Rail level, or collectively through RDG, or both.

We do however acknowledge that social media channels as a means of communicating and obtaining information are becoming increasingly popular, therefore this means of promoting information about Assisted Travel should not be ignored. It can also be an important way to give people confidence to travel. An example of where this works well relates to the TfL Twitter handle (@tflaccess) as this provides up-to-date, real time information on London transport routes, including when, for example, lifts are out of service and when they are back in service. A further option to consider here would be to advertise Assisted Travel options in the form of promotion of filmed Assisted Travel information sets, and targeted at users who are searching topics for example, on accessibility, disability, or even medical equipment.

In conjunction with this, it would be useful to consider a much broader based social media review to explore how this may provide a wider range of information on using the rail network to help disabled people make an informed choice to make a journey. This might also offer an effective means of encouraging travel by rail, for example promotion of Disabled Person's Railcards and positive disabled passenger / customer feedback.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

We believe that it should be straightforward technically as this approach essentially involves a link from a home page to a further page(s) that provide relatively static data. Providing such a link from Operators' home pages has the potential to significantly improve awareness of any local Assisted Travel service offer.

This approach works well with the airline industry. The Civil Aviation Authority has worked with airports and airlines to provide comprehensive and clear information on their individual websites, just one click away from the homepage. The CAA also provides this information in a web directory on its own website and includes hyperlinks to the special assistance web pages of all the UK's airports and the major airlines flying to and from the UK - <https://www.caa.co.uk/Passengers/PRM/Special-assistance-guidance-from-airports-and-airlines/>.

The location of a 'one click' Assisted Travel request facility in a prominent place would serve well to enable non-disabled people to understand that assistance to make a journey by rail is available, who in turn could share this information with disabled family members and friends.

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

It depends what is meant by 'intrinsically linked', but in principle, providing information on Assisted Travel at the time of booking, and facilitating the booking of

assistance by those passengers that require support to make a journey is inevitably a worthwhile improvement. However, a point also needs to be made that a wider range of information on rail travel options for people with disabilities should be provided, including, but not purely restricted to Passenger Assist related journey solutions. For example, it would be useful to include an option to reserve a wheelchair space prior to making a journey as this is not always possible, and the absence of this facility adds to the anxiety of passengers who use wheelchairs and may prevent them from travelling.

Disabled passengers may also be making the purchase with a group of friends / family who aren't disabled who may be confident booking the ticket but not the assistance on their behalf. So the move to intrinsically link shouldn't be the only option. The ability to amend or finalise Assisted Travel options later in the process also needs to be considered as an option.

It would be helpful if a passenger could book assistance when buying a ticket in the same transaction, acknowledging that on occasion a passenger may not be certain which train they will travel on, and that being the case, they can request assistance at a later time following the principles of Turn up and Go.

The Passenger Assist system generally works well for long distance operators, where people plan their journeys, book assistance, and buy tickets in advance (sometimes at the same time). One point for consideration here would relate to how Assisted Travel support would apply to third party booking agencies, for example, The Trainline.

Passenger Assist is less well suited to the greater number of high-frequency non-reservable trains used for local/ commuting trips, where people invariably do not buy a ticket until shortly before or during travel (or are using contactless payment, or have a season ticket / Freedom Pass). For these journeys, most disabled passengers will not book Assisted Travel support in advance.

In terms of the mechanics of how integration might be applied, this needs to be based on a detailed understanding of user experience, and informed by customer research.

Notwithstanding the need for this research it would seem sensible in principle to provide Assisted Travel information and options for people with disabilities at the pre-ticket purchase, journey planning stage, as well as after ticket purchase, with the latter being augmented by the option of booking assistance.

There are various ways of achieving this kind of integration, some relatively light touch from a technical / IT perspective, whereas others would be much more complex and costly. We note that within the consultation document, ORR suggest that the new RDG reservations system 'RARS' may make technical integration of booking Passenger Assist with purchase / ticketing much easier. Whilst we agree that this is a worthwhile development, information provided in this consultation doesn't allow a means to comment on this possibility in detail.

We would therefore welcome the opportunity to further explore how 'RARS' may offer a more effective Assisted Travel solution as this product evolves.

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

We are aware that each local authority district has a 'Council for Voluntary Services' which supports the charities in their local area. Operators could make a link with these organisations and request they link to their respective member organisations in order to promote and provide Assisted Travel information. It would also be useful to link with national charities with a specific remit in terms of improving the life chances of people with particular impairments (for example MIND – Mental Health) to promote Assisted Travel options.

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

We believe that the way forward would be to ensure that there is a carefully worked out and clear message for Operators to share via a pre-determined communications and engagement campaign, and provision of supporting materials and information for dissemination. There is also clearly a personal engagement role for rail operator Stakeholder Managers.

We also believe that there are three wider issues that the ORR needs to consider in context of this question:

- 1) Providing and promoting information on assisted travel or facilitating booking of assistance really only does part of the job unless clear guidance is also provided on who potentially needs to book assistance, and who may be able to travel on a 'turn up and go' basis. This latter point is more complex than it sounds as it will depend on the station, route and specific disability of the passenger ('for instance 'turn up and go' may be possible for a wheelchair user at a major station with good levels of staffing, but not at an unstaffed halt on a rural route). There are both policy and informational / data gaps in this area at the moment, and the work required to address them is substantial. This would therefore need careful consideration prior to any community engagement work taking place because a 'one size fits all' approach will not work for everyone;
- 2) This is not just an Operator / Network Rail issue, as it would be reasonable to assume that around 20%-30% of rail tickets are now purchased from licenced third party retailers (such as the Trainline); and they need to be included within any programme of improvements; and
- 3) Any programme of initiatives to raise and improve awareness of Assisted Travel needs to be part of a wider programme that also makes provision for accommodating the greater demand for assistance that will inevitably result. This means additional staffing and improved staff training to meet the needs of passengers with a wider range of visible and non-visible disabilities. It would be a major 'own goal' to encourage use of Assisted Travel only for

users to be disappointed, and potentially seek redress, when assistance isn't delivered because demand has outstripped the available delivery resources.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

We believe that there is no 'magic bullet' solution here. The new reservation system 'RARS' aims improve the IT framework that supports booking and delivery of Assisted Travel solutions, and lead to a concomitant improvement in performance but it will not 'fix' the problem of delivering Assisted Travel solutions.

The rail industry is used to providing reliable communications as it does it with, for example, signalling. The same 'fail-safe' approach could be implemented for Assisted Travel, but this requires minimum guaranteed staffing levels, reliable processes, equipment, and monitoring of effectiveness.

Critically, the industry has to decide on the future function of on-train staff in delivering assisted boarding / alighting (including at the vast majority of stations which are not fully-staffed) and assistance on-board at all points of the journey. At present, many rail operators rely on verbal communication between platform staff / customers and on-train staff to communicate. The fact that 'operational' on-train staff step onto the platform at each station and can hold the train if required, in this case to enable a disabled passenger who may need extra time to board /alight the train to do so. If on-train staff in future are a) not guaranteed, b) not available on the platform; and c) not able to hold the train while delivering assistance, or speaking to platform staff or a customer, this will severely compromise the reliability of Assisted Travel solutions. We are aware that this is already known to be a problem with rail operators where on-train staff do not have a traditional operational role.

It needs to be recognised that probably the easiest option for disabled people is booking Assisted Travel support themselves online or by telephone. This is how support is requested to make a journey by air travel and it works well. There is usually a tick box option for assistance and you choose what you need, and when. It also needs to be recognised that many people book a journey by rail by phone, or in person at a ticket office so these communications also need to be carefully considered.

In essence, the effectiveness of communications comes down to defining simple processes and protocols and embedding them in staff training. Monitoring of performance and establishing a culture of 'continuous improvement' should result in a gradual but sustained improvement in performance over time.

Basic improvements in the provision / utilisation of on-board communication systems such as on-board telephone / intercom systems within the accessible area of train would be a useful step forward to enable disabled passengers to communicate with on-board train crew. Promotion of such communication devices would serve well to

help address a lot of the in-journey issues currently known to exist. Boarding a train, making the journey and alighting are the three key access stages when disabled passengers may require assistance. If the driver or member of staff on board has the means to understand that there is a person requiring assistance during a journey, they can be more aware and take action where required. Transferring that information not just between stations but also on board can help reassure a passenger that assistance is available if required, and help to avoid any problems which can occur during the journey (such as reminding train crew that a passenger needs to alight at the next station). This is especially important for people with certain types of non-visible disabilities.

Standard, cross-industry processes and protocols for communicating need to be included in industry-wide training material, and embedded in the staff training programmes of all rail operators. This should be developed further. In particular, it ought to facilitate better communication between rail operators, important for multi-leg journeys involving more than one operator. For rail operators, it ought to be more efficient as the cost of developing these processes and protocols, training materials and so on would be shared.

We believe that the RDG is the natural leader in the development and ongoing management of the approaches suggested above, which will inevitably require additional funding and resources from rail operators. However, given the potential for efficiency savings it may be a less costly approach in the longer term. DPTAC feel that the scope for RDG providing centralised staff training in this area is also worth exploring, as this would further support more reliable communication and more consistent delivery of Assisted Travel solutions.

We are not sure that there is sufficient clarity around the definitions of 'Assisted Travel' and 'Turn up and go'. The ORR consultation document takes a similar approach to both whereas there are some important differences. The lack of clarity is not helpful for passengers with a disability when planning or making a journey, or for rail operators who are required to deliver assistance.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Please refer to response provided to Question 9 above.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes. We believe that this would be helpful, serving as an additional incentive for rail operators to deliver Assisted Travel solutions consistently. However, it needs to be simple to use and effectively communicated. There is a risk with this approach in terms of potential disagreements between individual travellers and rail operators on the extent to which assistance was or wasn't delivered, but the introduction of an industry-wide ADR scheme and Rail Ombudsman approach ought to provide a

resolution process for such disputes. Such an ADR scheme must be simple to use and effectively communicated to consumers. Furthermore, it would be useful to define tangible standards on what would constitute a reasonable delay as opposed to 'non provision' of requested Assisted Travel support. For comparison purposes, it may be useful to consider how the airline industry approach this issue.

Disabled passengers are increasingly using the rail network to make a journey with an expectation that they can do so safely, on time and with the appropriate level of assistance provided.

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

Consistency and clarity for consumers around what to do when faced with a problem and how to seek redress are crucial. We believe that a national redress policy / scheme is essential. It is easier to communicate the existence of such a policy / scheme, and easier for disabled passengers to seek redress, should they have a need to do so. It would also make it easier to monitor overall standards of service, identify gaps in delivery among rail operators and bring transparency to performance issues..

A further point to be made in this context is that a national scheme would help to limit any potential disputes between rail operators in terms of where failure to provide Assisted Travel lay during the course of a journey.

Chapter three – Strengthening staff training

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

We believe that the following points could be considered here:

- Agree a national training framework, and have it designed and delivered by suitably qualified and accredited trainers;
- Agree frequency of training;
- Agree which training courses would be mandatory according to whether staff undertaking this training are front facing customer service personnel, or not; and
- Agree on which training modules should be delivered by e-learning modules, and which modules should be delivered in a classroom / face to face basis.

In addition, we suggest that this is an area where RDG is perhaps best placed to lead a project to define and deliver the necessary training framework to ensure consistency across the rail sector.

Q14. How frequently should disabilities training take place and its content be refreshed?

We believe that the recommendations in the RDG report quoted by the ORR seem sensible, albeit perhaps with some additional elements which are detailed below.

- Training for all new staff with additional, practical training for all customer-facing staff;
- Refresher training every two years with online training available in between refresher courses;
- Review of training material on a bi-annual basis, and refreshed as necessary, taking advice from DPTAC at the point of review; and
- Additional, more intensive training for the leadership teams of each Operator / Network Rail on a bi-annual basis.

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

The DPTAC training framework was developed with a large number of stakeholders and provides a comprehensive model for training across all modes. However, we accept that as it is almost a decade old it would need to be reviewed and updated before mandating its use. We would suggest a task and finish group comprising DPTAC, ORR, RDG and DfT could be established to carry out this task.

A further comment here relates to identifying and agreeing the role and responsibility of DPTAC in overseeing any mandated training.

Given the above point, making the DPTAC guidance mandatory when there are inevitable questions marks around the remit of DPTAC to manage the framework may prove problematic. However, there is a strong case for having a national training framework, and a number of options for managing such a framework. Three possible options might be:

- DPTAC management but only on the basis that specific funding is made available to support the work;
- Management by Operators collectively through RDG with annual review and comment by DPTAC; and
- Management by another entity with annual review and comment by DPTAC.

Irrespective of how the national training framework is managed, it is clear that there is considerable benefit in making training mandatory, particularly in terms of establishing a manageable approach in terms of improving the consistency of delivery and a more consistent customer experience.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

We believe that bi-annual verification of the quality of training is both important and necessary. Depending on the approach adopted, if a national approach is adopted with centralised training based on training materials that are compliant with a

national training framework, then the need for verification becomes more limited, particularly if the agreed national training framework is based on the work of an independent body. Ranking the quality of training, if all rail operators provide a universal model approach would seem superfluous.

There is however, a strong case for independent verification and ranking if training remains at individual rail operator level.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

We understand that Transport Focus undertook research on this subject, as did the RDG in recent years.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

We recognise that currently the monitoring is very rail industry based, and self-reporting is prevalent.

In the airline industry in some airports in Europe there is use of a standardised form for every journey which the passenger and assistance giver must sign off to comment on the level of service experienced. This is literally a tick box approach with a space for comment. Something similar in the rail industry could enable accurate monitoring information and feedback to be generated.

If app-based technology allows it, this may also offer a means for disabled customers / individuals to rate service. As with all paying customers, disabled passengers should be able to comment on when the service is above or below par in a way that relates to their particular needs and expectations. Equally, introduction of a means to feedback via these suggested approaches could also create a means to generate positive feedback to help rail operators better understand when Assisted Travel services are working well in terms of meeting disabled passengers requirements.

The main 'National Rail Passenger Survey' doesn't currently target disabled people, and having data on Assisted Travel could be introduced to capture independent data on how well licensees are meeting their Assisted Travel obligations.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We believe that information during disruption could be hugely improved by making better use of technology. This includes improving on-board Wi-Fi, and ensuring it is free at least to disabled people enabling them to keep abreast of any journey disruption or delays. Using social media to inform travellers what is happening during a disruption, tannoy / intercom announcements and use of on board visual displays to disseminate information, and allowing a disabled traveller to use an app to seek assistance or information from the guard of a train would be helpful.

It is commonplace for service providers to seek feedback on satisfaction after every user experience. We don't see why in principle a similar approach shouldn't be adopted for Passenger Assist. Such ongoing customer satisfaction monitoring could include mobile texts, short e-mail questionnaires or 'pop-up' boxes on websites.

Chapter five – Reviewing DPPP's

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

Yes. We would welcome the opportunity to further discuss options to review and update the DPPP guidance which is now very out-of-date.

Q21. Do you agree with our proposed approach to reviewing DPPP's?

Yes. We agree with the proposed approach to review DPPP's, however, the current DPPP template used by ORR / Rail Operators is too focussed on the 'Medical Model of Disability'. The terminology used to define the principles / philosophy for Assisted Travel support and solutions needs to focus on improving accessibility by empowering and enabling customers to make a journey by rail in a standard, straightforward and routine way.

We also suggest a review of the DPPP 'title' itself. The concept of 'Protection' of disabled customers is in itself an outdated phrase and serves only to segregate and exclude rather than unite and include. The concept of 'protection' risks colouring the way rail operators approach their disabled customers instead of simply making access provision part and parcel of the delivery of quality customer service.

As explained in our response to Question 2 above, we have been working with ORR and Transport Focus on a "universal" DPPP which simplifies the message for passengers about what they are entitled to expect from the operator, and delivers this in a one-page format. This 'user-friendly' document should be finalised and published as soon as possible as part of the proposed approach.

[Ends]

David recently shared with me the consultation document and I had a meeting with him last week to discuss the work the ODI are doing on behalf of the Minister for Disabled People to support accessible transport. I have shared this with some of my contacts too for them to provide input.

I am pleased that the staff training section recommends that disabled people are involved in the delivery of the training. I have witnessed a number of good examples of transport operators engaging directly with local disability organisations. This provides a greater understanding of the barriers disabled people face. Being able to travel independently with the support of well trained staff not only supports independent living but enables disabled people to access work and training (the government target is to get an extra 1 million disabled people into work). Having a disabled person providing some of the training also enables the staff to have more understanding and have insight and empathy into the barriers.

From recent meetings with operators and charities it has also been highlighted that it is important for managers (CEOs) to engage in the training. This provides them with an insight of the importance of accessibility training and focuses on the budget needed for a quality service to achieve a positive outcome.

I hope this helps

Hi,

I'm Vice Chairman of Edinburgh Access Panel which is a panel of volunteers with various types of disability who strive to improve access for disabled folk to transport, buildings, streetscape and services in Edinburgh.

One of our key access issues - which has been high on our agenda literally for years - is the need to improve access at Edinburgh's Waverley Station. I'm hoping you'll receive input from several of our panellists specifically in response to the questions set out in the consultation. In addition, I'd like to take this opportunity to make you aware of the key access issues that concern us. Although this concern is in the context of Waverley, I suspect the issues are generic and apply elsewhere too.

They are as follows.

1. The consultation document rightly stresses the need for seamless assistance spanning all legs of a multi-leg journey - eg Dundee to London changing at Edinburgh. What we'd like to see also is the provision of seamless assistance between taxis and trains. A disabled passenger alighting from a train and requiring a taxi should be escorted by Assistance from the train to the taxi rank and "handed over" to a taxi marshal who is responsible for looking after the passenger until he's safely inside a taxi. And vice versa for a disabled passenger arriving at the station by taxi: the taxi marshal should look after the passenger until Assistance arrives at the rank to escort them to the train.
2. The Assistance service can clearly be delivered more effectively and satisfactorily when assistance is pre-booked. The rail companies must therefore find a way to encourage passengers to pre-book. We believe external consultants can advise.
3. We understand that a significant amount of Assistance time is wasted searching for no-shows - ie for passengers who do not turn up at the station after pre-booking assistance and who do not bother cancelling their booking. Once again, the rail companies must find a way to encourage passengers to cancel their bookings for assistance rather than just failing to show up. As before, we'd like to see external consultants hired.

I hope you can find a way to blend these issues into your mix. We believe that resolving the issues would allow Assistance to be streamlined, with quality enhanced but with costs

reduced. If the issues remain unresolved, then the only solution is surely to throw more and more resources at Assistance.

Happy to discuss.

Robin Wickes

Edinburgh Access Panel

GTR Response to ORR's Improving Assisted Travel (January 2018)

Chapter 1 – Raising passenger awareness

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

GTR agree that more can be done to promote assisted travel, and feel that alternatives to leaflets and posters can be developed. We feel strongly that promotion of Assisted Travel information should cover the range of options and provide choice to customer – for example, promoting booked assistance as well as un-booked assistance.

For passengers, we already produce a variety of support materials that promote assisted travel, priority seats, baby on board badges, and also specific communication aids for those with hidden disabilities (Communication Guide and Travel Support Cards).

Across a range of disabilities, we are mindful that a significant number of people do not travel by train and therefore information and promotion of assisted travel information at stations would not necessary support creating awareness for those who currently do not travel by train. We are currently reviewing local route partnership options e.g. with Local Authorities, hospitals etc. to identify opportunities to promote the assisted travel option available and encourage more people who require support on their journey to consider and try travelling by train.

As an industry we would like to change the format of information provision so that we supply information online where possible, in order to minimise potentially wasteful printed material, recognising that some passengers prefer to access printed material. We are also exploring the provision of apps to provide journey support.

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

GTR support the suggestion for accessible materials to adopt the Crystal Mark standards - particularly given the need for options to be understood by those with learning difficulties for example.

Our marketing perspective, is that we would fully endorse a move to use the Crystal Mark - there is sometimes misunderstanding around the Crystal Mark, the Crystal Mark is about communications being in plain English, fully accessible and adopting this standard is not substantially impacted by tone of voice/branding. We fully agree that we should look to removing jargon and historical use of opaque phrases that do not mean anything to the customer.

Q3. What steps can be taken to increase website accessibility?

Accessibility considerations are part of our checklist for when we design new features. In terms of testing, we have started to engage real users to seek their feedback, and are planning to prioritise and implement their suggestions, before further usability research.

We also engage with our GTR Access Advisory Panel to review clarity of information (including our web sites) across the spectrum of access needs.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We currently have a highly active Twitter and Facebook feed primarily aimed at tactical inclusive 'on the day' communication, and facilitating 'self-service' by signposting passengers to our web sites. We support the principle of using social media to communicate with passengers though recognise that this is one channel for raising awareness and also providing support, however passengers with accessibility needs many not wish to use this form of communication.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Where possible we do try to do this but obviously, with the sheer amount of information that we try and get across to passengers it isn't always easy to maintain a link on the landing page – although the information is always available from the drop down menu on the landing page.

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

GTR shares the goal of simplifying ticketing and booking assistance for passengers.

Our call centre retailing and assisted travel teams operate separately via two organisations based on the distinct purpose of each function. To restructure these functions would result in significant costs. However, in principle we could explore how passengers purchasing rail tickets on at the telephone could be offered and directed to assisted travel to promote awareness.

Ticket buying can also be via other channels e.g. online, from TVMs and ticket offices and feasibility of booking via these channels needs to be considered in detail as that would require material changes and significant investment to be made. We are not clear as to the feasibility of this, especially when noting that the provision of a taxi could form part of the booked assistance.

We do see the benefit of linking ticket buying to booking assistance, despite the noted not insignificant barriers, and would support an industry-level approach, noting that many end-to-end customer journeys cross TOCs and therefore an industry-wide proposition would be required.

We note that where TOCs provide seat booking that link with ticket-buying and assistance booking is more relevant for a customer. We would also highlight that any remote channels for ticket purchase and booking boarding assistance require accurate source data on facility availability (e.g. temporary lift faults) and the industry system (Knowledgebase) would have to be robust to support this.

GTR Access Advisory Panels have highlighted that the high level of assistance booking via the telephone (rather than use of the online form) - at c99% of all assistance bookings with GTR is not down to a lack of awareness of booking options but rather the confidence that speaking to a person provides to the individual booking assistance.

We would therefore suggest that targeted research would help to understand the value of linking ticket purchase and assistance booking from the perspective of customers with accessible needs.

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

We support this aim. At GTR we are actively working on a campaign to understand barriers to travel and on that basis to promote assisted travel choices via outside agencies in order to target passengers who may be unaware of options to travel. This is an area we are working closely with our Access Advisory Panel (AAP) to support targeting local groups (e.g. local Mobility Forums and user groups) and media across our network.

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

Our AAP and stakeholder network gives us a strong starting point for local contact. We would support RDG engaging with national charities and representative groups for those passengers with access needs.

Chapter 2 – User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

The current Passenger Assist system does not reflect modern trends towards smart phones and apps for example. We are already committed to working closely with RDG on the introduction of the new cross-industry Passenger Assist system that will support improved communication between TOCS and improved reassurance for passengers regarding their journey. RDG are aware that the future solution needs to cater for the varying operating models in place across the UK, e.g. DCO, DOO, unstaffed stations. The solution must also recognise choices for passengers who may wish to use traditional communication methods i.e. the majority of existing users (99%) tend to book via telephone rather than on line and not all passengers would be able to access a solely app based booking system.

We support RDGs short term proposals to introduce new tools to improve staff communication between stations due later in 2018.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

GTR support this objective in principle though we don't believe a lack of protocol between TOCS is a root issue behind assistance failures but more commonly simply a breakdown of basic communication between staff e.g. origin staff calling a destination station for a passenger requiring disembarkation assistance, complicated at some terminus stations by very short notice platform alterations.

GTR closely monitor the delivery of assisted travel support through a variety of means; including disabled mystery shopping, Access Advisory Panel journey feedback, detailed root cause of complaints and Twitter instant alerts. Investigation into the root cause of each is a priority and targeted improvement plans are in place, however commonly the root causes is around the aforementioned simple breakdown in people processes (station calling and accessing booked assistance emails).

RDG who would need to lead this approach, with engagement with other TOCS. It is important however that this work recognises the various operating models in place e.g. DCO, DOO and Conductor operation etc.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

GTR will refund the journey fare if a booked assistance request is not met following investigation (within our Passenger Charter).

Whilst there may be a legal distinction between booked and unbooked assistance, any reports of an un-booked assist not being met would also be investigated and if appropriate a refund or gesture of goodwill provided.

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

GTR already has a redress policy as per Q11 above.

Chapter 3 – Strengthening staff training

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

We support the principles of consistency of accessibility training across the industry though would suggest a gap analysis study is carried out at the outset to identify core training requirements. At GTR, training is budgeted on the basis of our contract within our franchise. We would suggest therefore that any new cross industry training should be introduced at the outset of rail franchises with appropriate planning and funding in place.

Q14. How frequently should disabilities training take place and its content be refreshed?

Subject to the above benchmark exercise, we would suggest that bi annual review already in place with GTR accessibility training (e-learning) is adequate, supported by on-going accessibility briefings to front line teams and on the job coaching etc.

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

DPTAC are well placed to set the training framework. The existing framework has been in place for several years and we would suggest it is reviewed to ensure it is relevant and up to date.

Q16. Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this e.g. ORR, DPTAC etc?

We would support independent validation in principle, again subject to the value of this being supported by the gap analysis and the cost being commensurate with the benefit and supported by the industry. The Institute of Customer Service are independent and cross-industries and provide various accreditations (including for customer service training). Should the gap analysis exercise and benefit assessment validate the benefits then GTR believe that an external cross-industry accreditation should also be considered, along with the ORR and DPTAC.

Chapter 4 – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Data currently collected is already shared with ORR – ranging from complaints through to pre-booked assistance volumes. At present we are severely limited in collecting unbooked assistance data via our front line teams and RDG and TOCS are exploring future innovation to capture numbers of passengers travelling. We are also reviewing improvements to how we gain insight from passengers who have used our pre booked assistance service (which is currently via a call back survey), and plan to shortly introduce 'on line' post journey surveys in addition to reviewing our existing telephone based surveys, to maximise passenger choice and the insight.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

We support the principle of on-going improvements to data collection and monitoring including repeating the research recently undertaken by the ORR (Passenger Assist and un-booked assistance surveys).

We believe that the focus on 'dissatisfaction' and complaints that GTR have in place and completing root cause analysis to target issues and improve the quality of assistance provision is critical and is more meaningful in building passengers confidence to travel by rail by systematically removing issues and barriers, far more so than any additional research or manual reporting. Complaints data is already provided periodically to the ORR.

However it is essential that any data collection does not impose an unrealistic manual burden on our frontline staff, which could potentially detract from the attention that they give to passengers requiring assistance etc. We provide a significant volume of un-booked assistances across the GTR network and this is simply part of BAU for our frontline teams, we would be keen to understand the benefits to our passengers and to the improvement of the quality of assistance provision in adding a manual reporting requirement to frontline teams who complete a wider variety of roles (e.g. from station teams through to on-board staff, but noting that GTR also run a DOO / DCO operation on some routes). We would also question that where data is manually collated in different ways by TOCs that the accuracy of it with respect to industry comparability would be debatable.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We and RDG are exploring how technology and innovation can be harnessed to provide passengers with increased confidence that assistance will be consistently delivered. RDG are aware of GTRs view that any solution must consider the range of operating models in place across the UK, including unstaffed stations, DOO, DCO etc. The vast majority of passengers with accessibility needs travel without requesting assistance so we would support methods of also facilitating the capture of their feedback also. Please also see GTR response to Q18.

Chapter 5 – Reviewing D PPPs

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

GTR welcomes the approach to update the guidance though on the basis of providing a template and resource in order to support clarity and standardisation of D PPPs (i.e. establishing best practice). Any potential SLAs do need to be realistic and considered with individual TOCS (in addition to RDG) to ensure compatibility with working practices and commitments within franchises.

Q21. Do you agree with our proposed approach to reviewing D PPPs?

We welcome the proposed relaxation of submitting D PPPs for annual review.

We would be keen to understand the value of the internal annual review of D PPPs and suggest this may not be of value unless a material change is proposed. We would support a more streamlined consultation and review process.

Guide Dogs' Response to the Office of the Rail and Road Regulator (ORR), Improving Assisted Travel Consultation

Submitted by John Welsman, Guide Dogs' Policy Business Partner, Travel & Mobility, January 2018

About us

Current estimates suggest over two million people with sight loss are living in the UK of whom around 360,000 are registered as blind or partially sighted.¹ Guide Dogs provides mobility services to increase the independence of people with sight loss. Alongside our direct services we promote best practice and campaign for the elimination of barriers to independent mobility. We work collaboratively with other third sector organisations, local authorities and commercial companies to improve accessibility and customer experience. This has included working with technology and transport companies on projects which seek to reduce stress and improve confidence among vision impaired travellers.

The travel needs of vision impaired people

All forms of public transport including rail travel is essential for vision-impaired people to be able to get out and about. Pretty much by definition people who are blind or partially sighted are unable to drive themselves from A to B. To be able to access rail travel, guide dog owners and other people with vision impairments may need specific assistance at various stages including with journey planning, ticketing, navigating to and around the station, managing connections on journeys that require a change of trains and of course, boarding and leaving the train.

Our responses to the questions

We do not intend to answer every question in the consultation but rather have concentrated on those that are of particular interest to us and to those we serve. Please feel free to come back to us for clarification on any of the points raised.

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

People with vision impairment find it much harder to locate and read written information in the external environment including at stations. This can be the size of text, the colour and tonal contrast of text, the

¹ Royal National Institute for Blind People [research](#)

display mechanism used, or the ability of the individual to determine which information is relevant and which is not, in an environment which is possibly full of textual content. Even when signage follows principles of best practice, it can be hard to locate in an environment that has is visually very busy, with advertising hoardings, pop up promotional stands, and flip chart stands containing travel updates dotted around the area.

During the London 2012 Olympics, visitors were helped to find information points or follow routes by the deployment of vivid pink signs. Amidst all the hustle and bustle of busy stations, visitors were able to quickly and easily find what they were looking for. So, we know it is possible to design something where important information can be more easily identified. The challenge is how to make the people who would benefit from Passenger Assistance aware of its existence and then help them to locate it.

Large print materials on racks and striking posters in prominent places around the station, may work to support people with a fair degree of useful sight. However, there will be a proportion of vision impaired passengers who will not be able to meaningfully determine if text is relevant, or will not see it at all.

For a while now we have been promoting the importance of inclusive design. Through a mixture of low tech and high tech solutions it is perfectly possible to improve way finding with any built environment including railways stations. This could include use of guidance paving or the tactile "information surface" used at some "help points" through to the deployment of beacons which interact with smart phones connected to headsets. We have undertaken work at Reading Station as part of a pilot with Microsoft and other partners to improve navigation in and around the station. Clearly when an individual locates the point at which information about Passenger Assist can be found, it needs to be accessible.

Q3. What steps can be taken to increase website accessibility?

This has been a constant focus in the vision impairment world, since the mainstream introduction of the World Wide Web in 1995. Technologies have emerged to make the internet more dynamic and interactive, and with this, specialist technologies, like screen readers and magnifiers, have evolved to keep up with trends in information provision. However, this does create some challenges for vision impaired people wishing to use the internet or other connected technology, to access services.

The introduction to this consultation refers to the technical accessibility of websites for screen reader and magnification users, and the navigability, readability and content of websites.

These two concepts, with regard access to web based content, are intrinsically related and should not be distinct for different user groups. Many service providers make the mistake of thinking that they can get their website checked by RNIB for World Wide Web Consortium (W3C) compliance, and if it passes, the site will be perfectly legible for people using a screen reader or magnification software.

From a technical perspective, this may be true, but what it does not address is the legibility of the content, the ability of a vision impaired person to understand and navigate the site, read its content, without missing key elements, or comprehend what they need to do or where to go, in relation to the page they are on.

Therefore, the website or content on specific pages needs to be informative and free of irrelevant links or content. Pages should maintain a constant structure, and ideally provide a breadcrumb trail from the home page. Links to accessible services and provision need to be directly accessed from the home page or be no more than one page away from the homepage as stated in the guidance.

These pages need to clearly relate to what help can be provided and by whom. It should avoid when necessary being prescriptive as to which disabled group the information relates to, but should be more focused on generic information which would be of use to any individual looking for specific types of help.

For example, large print may be employed to support people with sight impairments, but it will no doubt benefit many older people who do not recognise they have failing sight. Step free access may be designed to support wheelchair users, but has immense value for many groups of people who do not like, or do not have the confidence to use steps. We favour universal design in which the needs of all groups are considered. For instance, if a wide ticket gate at a station is designed with wheelchair users in mind, it should be wide enough for them and assistance dog owners to get through it but maybe more of a challenge to the parent with a triple width pushchair. Whereas a gate that is designed to accommodate a triple width pushchair will also accommodate wheelchair users and assistance dog owners.

Having said that, there will still be a need to bespoke information for specific groups. For instance, the location of a spending area where an assistance dog owner can relieve their dog.

Dynamic website content which changes to reflect the input from a user is becoming increasingly prevalent. Sighted people are able to view and take in content of an entire web page at a glance. However, this can present immense problems for screen reader and magnification users who work in a more linear fashion. A sighted person has immediate sight of any changes made on a page, as they see the visual impact of their input on the screen in front of them in an instant and they can quickly and easily navigate their way around, ignoring superfluous content, focusing only on the elements on which they need to focus.

One possible solution is for ORR to provide a base line specification as to what information should be provided: in what order information should ideally be displayed, and how assistive information should be provided, from a technical perspective. To ensure that assistive information on any operator's website follows a script, ensuring that vision impaired people accessing the website get the same information from any operator, even if some elements differ stylistically.

To make this process more generically accessible, perhaps the Passenger Assist process should be independent of the operator, in relation to the information which is provided, requiring providers to link to a centralised service. This, in turn, could be a one stop shop, mitigating the variances inherent in accessing assistive services via different operators, and mitigating some operator's reluctance or inability to provide the service, if it is provided by an operator outside their franchise or service level agreement with their customer management centre. And in the event of any future legislative changes or the introduction of new guidance, it would be far easier to update one central point of information than to require multiple providers to all update their own information.

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

Guide Dogs is aware that some people have had to book tickets through a mainstream on-line booking process, before being able to contact the operator's assistive travel service. Those tickets are cleared and new tickets are then generated including alternative reserved seats especially if a vision impaired person is travelling with a guide dog, which may, in turn, need a seat space blocked to accommodate it. Being able to book tickets and assisted travel in the same transaction via an accessible website or during one phone call would make the process less frustrating and complex.

Whilst not related directly to passenger assistance, it is worth flagging up that many rail operators continue to encourage passengers to collect pre-booked tickets from ticket machines at stations, especially if they are booked within a week of travel. In the majority of cases the machines are based on the passenger using a touch screen which a significant number of vision impaired people are unable to use.

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

There are numerous national and local third sector organisations supporting the needs of vision impaired people through which information on Assisted Travel could be disseminated. Vision UK is an umbrella organisation to which most sight loss charities belong and of course there is RNIB and Guide Dogs, both of whom have their own communications channels to members and beneficiaries. In terms of local sight loss charities, Visionary is another umbrella organisation that links and supports local sight loss charities by providing them with information and various resources.

Outside of the voluntary sector there are NHS eye clinics and low vision clinics that will often see people at or shortly after the time someone loses their sight and individual councils have statutory vision rehabilitation services. Rehabilitation workers equip people with sight loss with information, equipment and training to help them to retain or regain independence. Guide Dogs is connected to all of the voluntary sector organisations listed above and has good links with the professional bodies that manage those statutory services that provide support and information to people living with sight loss and we would be happy to provide contact details if that would help.

Finally, not all vision impaired people identify as such or even recognise that they have significant sight loss. Older people in particular might simply ascribe failing vision to a normal part of the ageing process. Therefore, consideration should be given to communicating with other organisations and agencies unrelated to the sight loss sector. For instance, through organisations like Age UK or SAGA.

Q9. How might the reliability of communications be improved?

This is one area where there is undoubtedly room for improvement. For most people with a need for Passenger Assistance, their needs are likely to remain the same across the network. And yet it is not uncommon for passengers to have to regularly repeat themselves by explaining their circumstances on every journey or even multiple times during a journey and especially when things go wrong. Whilst it might not suit every passenger, perhaps there is a case for some kind of "opt

in" service in which passengers can log their personal assistance needs and which operators could access this information easily in order to be able to respond appropriately and in a timely manner.

We are also aware of at least one technology company that has developed a prototype product based on an app that communicates between a person's smart device and a receiver inside the premises of a service provider. Any establishment that has the equipment and necessary software then receives an alert that someone with a mobility need has entered. So in the case of a blind person arriving at a hotel, reception is alerted and a receptionist is able to welcome the guest and offer assistance. If something like this were available linked to the sort of opt-in system referred to above, it is easy to see the potential for this sort of application of technology to improve communication and even navigation during a journey.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Some passengers with need for support may already have a distinct and fruitful relationship with one or more train operators. Arguably, such quality customer care may lead to those passengers developing a sense of loyalty to the operator concerned. In theory at least, such proven commitment to enhanced customer care could lead to more custom as passengers vote with their feet. But in reality, the single franchisee model which operates on a significant number of networks would limit the level of competition that could be generated through enhanced Passenger Assistance. In reality, many journeys entail more than one leg, and are often serviced by more than one operator. So for many passengers there is not really a significant choice of operators. Therefore, a centralised service offered by the rail industry as a whole and not by individual operators could help to secure consistency. Of course, disabled passengers would only benefit if such a service is of good quality.

Q11. Would a commitment from rail operators to refund the cost of the journey, if booked assistance was not provided as requested, be of benefit to both operators in demonstrating their commitment to providing a reliable service, and give passengers a form of remedy when failures occur?

This would be worth exploring as an additional incentive to operators to get it right first time. Having said that, we imagine that in every case, a traveller in need of Passenger Assist would much prefer the support to be in place than to have the cost of their journey refunded. Administration of the scheme would need to be simple and

streamlined. If the breakdown in Passenger Assist arrangements was not the fault of the particular train operator but of a third party, it would not help the passenger if there were to be a dispute between these different elements. The customer should be refunded automatically by the train operator and the operator should then seek reimbursement from whichever part of the system was responsible for the failure to provide the service.

It is impossible to anticipate how such a scheme might improve the performance of operators or increase the confidence of disabled customers, but the idea does appear to have some merit.

If you wish to discuss any of the points we have raised in any more detail, please feel free to contact us.

John Welsman.
Policy Business Partner (Travel & Mobility)

Improving Assisted Travel: A Consultation - Hft Response

Compiled by Billy Davis- Public Affairs & Policy Manager – January 2018

About Hft

Hft is a national charity that provides specialist care and support to over 2,500 adults with learning disabilities in order to live with as much independence, choice and control as possible.

We were founded in 1962 by a group of families who believed that, with the right support, their relatives were capable of more than society expected of them. Today, we still share that same vision. We support people to live independently in their homes through our Supported Living services, alongside Residential Care, and Short Break services. We empower people to make their own choices, including finding a job, building friendships and relationships and taking part in activities.

We operate in sites across England – from Newcastle to Newquay.

About Voices to be Heard (VtbH)

True involvement means providing opportunities to recognise and grow people's capabilities, and actively support them to put these skills to use in their lives.

That's why Hft has developed 'Voices to be Heard'; forums recognised and valued across the whole organisation. Our Voices to be Heard group was formed in 2014 when the Speak Out groups from both the heritage Self Unlimited and Hft parts of our organisation came together. The group advises Hft on what needs to be changed and has worked on specific projects requested by the management team, aiding the development of Hft.



Since the merger of the involvement groups, two national meetings have already been held and a 'Guide' to Voices to be Heard that explains what the group is for and what members can achieve has been published.

Every Hft region has at least one Voices to be Heard group and each of these elect representatives to attend Divisional meetings. One representative from each Divisional meeting is then also nominated to attend the National meetings and in

this way everyone supported by Hft has a voice which is heard by the Operations Directors when they meet twice a year.

About the Fusion Model of Support

Hft's Fusion Model of Support is a different way of supporting someone with a learning disability. The model puts the emphasis on **how** we provide support, not what support we provide. It contains all of our strengths and all of the elements that we believe are essential to providing high quality, person-centered services. When all of these elements come together, a 'fusion' is created – this is when Hft is working at its best.

At the centre of our model, and because they are at the centre of everything we do, are the people we support. Surrounding them are eight segments that reflect all of the specialist skills that we believe are necessary to provide excellent support. These segments also include some of the ethical and moral considerations we take into account when providing services.



Surrounding these segments are three supporting themes: 'care about' runs through everything we do, ensuring we provide 'quality' services that are 'continually improving'.

i) Person-Centred Active Support (PCAS)

PCAS is a way of supporting people so that they are engaged in meaningful activity and relationships as active participants, exercising more control over their lives and experiencing greater levels of inclusion, independence and choice.



ii) Specialist Skills



Specialist Skills means using proven expert knowledge and best practice to support people.

This includes providing support with physical, mental, emotional and social needs and also meeting syndrome and time of life specific needs.

iii) Creative Solutions

Creative Solutions means thinking openly and using imaginative and original ideas to find practical solutions to enhance the lives of the people we support.



iv) Families and Other Partnerships



This means helping the people we support to develop and maintain positive relationships with families, friends and other partners involved in their lives.

It means having the skills and understanding of how important it is to work in partnership with the people we support and those involved in their lives. This includes welcoming and valuing what families contribute to giving the best support.

v) Choice

Choice means enabling the people we support to have a greater awareness of the range of options available to them, so they can make the choice or decision that is uniquely right for them. This means people are more empowered to make informed decisions, even if these decisions may be considered 'unwise' by others.



vi) Total Communication



Total Communication means that all forms of verbal and non-verbal communication are thoroughly explored and embraced for each individual. This includes all body language, facial expressions, gestures, signing, verbalisation, intonation, photographs, drawings and symbols, written words, objects of reference and access to appropriate technology.

vii) Personalised Technology

Personalised technology means any technology which enhances the lives of the people we support. This includes specialist technology such as telecare, environmental controls and prompting devices, as well as mainstream technology such as quick cooling hobs and mobile phone technology.



viii) **Healthy, Safe and Well**



Healthy, Safe and Well involves all aspects of a person's life including their physical, mental, emotional, social, cultural and spiritual needs. It is a positive concept and means we will proactively work with each individual to find out what this means for them so we can help them to live more fulfilled lives.

This also means that, when necessary, we will support them to take risks to get the lifestyle they want, while also safeguarding them from harm.

ix) **Personal Growth**

Personal growth means the people we support will be helped to take control of their lives so they can continue to develop as individuals. This includes embracing new skills and knowledge, widening interests and having new experiences. Everyone we support will have the confidence to express their thoughts and ideas, increasing their self-esteem.



Knowing About The Schemes

Question 1: How can rail companies improve the way information about assisted travel is given?

If a company knows that a certain location has a large number of people with learning disabilities that use the station, then they can make sure more material is available.

At stations, we would also like to see staff to be trained in Makaton, to help communicate to those of us with learning disabilities who use Makaton to communicate.

Question 2: Are there any reasons why information should not be given in plain English?

There are a lot of companies now which will translate in to Plain English or Easy Read. Also, if all leaflets that a rail company makes were in Plain English or easy read, they could still be used by people who did not have learning disabilities. Voices to be Heard want to know why they don't do this as standard.

Question 3: What should railway companies do to make their websites more accessible?

There should be options for users to increase the font size, or change the background and colours of the website, to make it easier for us to read. Or for closed captions to read out the text to us, so we can understand it.

Also, not all of us can afford computers, but we may have a smartphone, as the big icons are easy for us to use. Companies must make sure that their website is mobile-friendly.

Question 4: How can rail companies use social media to tell more people about assisted travel?

For mainstream social media sites, it would be an important way of ensuring families and support staff are aware of your schemes and offers.

However, due to safeguarding issues, not all of us may have a social media page, or if we do, it is only for a small circle of families and friends. It is important that companies make sure that, as well as looking at the obvious social media websites like Facebook and Twitter, they also use websites such as SpecialFriendsOnline or SmileyWorld (social networks designed for adults with learning disabilities) to go to where your audience are.

Question 5: Should rail companies give information about assisted travel with one click from their websites' home page?

Yes. It should be made as easy as possible to find this information. Maybe a universal logo could be designed, so that we know where to click for this information, similar to the "disabled" logo used on toilets and other public spaces.

Question 6: Should people be able to book assisted travel at the same time that they book their ticket?

Yes, because we cannot travel without it, so it is an important part of our journey.

Question 7: How can rail companies make more people aware about Assisted Travel Schemes?

They could work more closely with local authorities to find out what services are available to disabled people, and make sure that all relevant marketing information is sent there, so it can be shared and displayed.

Rail companies need to work harder to get to where disabled people are. We cannot always get to stations or company websites to find the information ourselves.

Question 8: How can rail organisation work more closely with organisations that work with disabled people?

They can hold public meetings, or consultation events more regularly with disabled groups in their areas. Hft has locations all over England, and we would be more than happy to speak with companies about our experiences

and tell them ways in which they can make travel more pleasant for people with learning disabilities.

We would also like to see rail companies employ more people with disabilities. By making stations and trains more accessible for their disabled staff, it will be more accessible for their disabled customers. Studies have shown that employing disabled people, irrespective of the nature of their disability, ultimately has “a positive impact on the bottom line of the business”¹. Companies which employ people with learning disabilities reported that those individuals tended to have “a strong commitment to work, as well as good punctuality records and low absentee rates”². Research by the National Autistic Society shows that positive attributes amongst autistic candidates include: accuracy, a close attention to detail, the ability to identify errors and an excellent memory³.

As well as being a financial benefit to the companies, we think that this will also make things better for disabled passengers, as we will see people like us when we travel by train, which will make us more comfortable, and less shy in asking for help.

Improving The Schemes

Question 9: *How might we improve the way information is passed from one station to another?*

It would help if all railway stations had the same facilities available for people. This is particularly frustrating when you have booked your journey ahead of time.

Question 10: *Would new rules for rail companies make the service better for passengers who need the Assisted Travel Schemes?*

This would depend on what the new rules are. If the current rules are not being followed by all companies, then the government must do more to ensure that all companies are following the current rules before deciding to make new ones.

¹ “Leading Practices on Disability Inclusion”, 2012, *US Chamber of Commerce*, p.2

² Susan Hemmings & Jenny Morris, “Employing people with learning disabilities: A handbook for employers”, *Joseph Rowntee Foundation*, 2004, p.52

³ “Recruiting an autistic employee”, *The National Autism Association*, URL:

<http://www.autism.org.uk/recruiting>

www.hft.org.uk

Company registered in England No. 734984 Registered charity No. 313069 Patron HRH The Princess Royal

Question 11: *Should rail companies refund the cost of the journey if assistance does not work properly?*

Yes they should. You have not received a service that you have paid for, so they should not have to pay for it.

Question 12: *Should rail companies write their own policies for giving passengers compensation when Assisted Travel Schemes don't work?*

No, that would not be fair. Different companies would then have different rules and try and pay different amounts. If it is a full refund across all companies, then they will make sure that they deliver a good service, as they won't want to lose money.

Staff Training

Question 13: *How can different railway companies give the same good training to their staff?*

We think that there should be a national programme for disability training. It should include learning disabilities and other so-called "invisible disabilities", as well as physical disabilities, such as wheelchair users and blind or D/deaf people.

Question 14: *How often should disabilities training take place?*

Because things such as Assistive Technologies change quite quickly, we think once a year would be regular enough to account for this.

Question 15: *Should there be rules about including disabilities training in staff training programmes?*

We think that it should be a legal requirement to have a disabilities training programme available. If a company does not have one, it should not be allowed to bid to run a railway franchise.

It would also be nice if people with disabilities helped to deliver the training. At Hft, people we support are involved in our PCAS training, to help people understand the needs of adults with learning disabilities, and how the Fusion Model helps to make a real difference in our lives.

Question 16: *Should there be agreed standards of disability training in railway staff?*

Yes there should. Companies need to meet a standard to become a "Disability Confident™" employer. We would like to see a similar thing for railway companies – an accreditation that shows that their staff have all been on this training, and that

these high standards are being met. This could be regulated by the Department for Transport, or CQC.

Better Checking

Question 18: How should we get better at checking that Assisted Travel Schemes are working well?

As well as getting information from rail companies, we would like the Office of Road and Rail to talk to us, and other disability groups, about our lived experiences and get feedback from us about whether or not the schemes are working.

Question 19: Are there ways in which we can use new computer systems to check how Assisted Travel Schemes are working?

We don't know what the new systems are, so we couldn't really say. However, any way in which technology can be used to help give a more accurate picture is a good thing.



OFFICE OF RAIL AND ROAD

Improving assisted travel



Questionnaire

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Introduction



This report is about **assisted travel** on railways.



Assisted travel is the help that disabled people can get so they can travel by rail.



This report has been written by the Office of Rail and Road.

The Office of Rail and Road is responsible for:



- Making sure the railways are safe



- Making sure the railways are fair to everyone



- Checking that the railways are run properly



This report is about how we can improve assisted travel on the railways.

We have looked at:



- How we can make sure that people know about the Assisted Travel Schemes

- How we can improve the schemes



- How we can train staff so that they know how to help people and understand about hidden disabilities

- How we can get better at checking that the Assisted Travel Schemes work well



- How can we help railway companies produce better policies for assisting people with disabilities

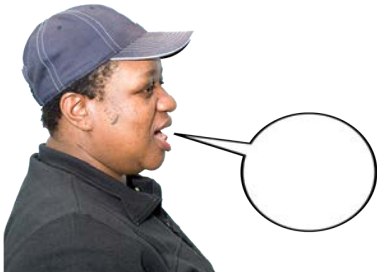


We want to know what you think.

Please read through the report and answer the questions.

Please send your answers back by 31 January 2018.

Assisted Travel



More people are wanting assisted travel. In 2016-17 people asked for assisted travel 1.2 million times.



Assisted travel is where railway staff help you with things like:

- Planning your journey
- Booking tickets
- Moving around the station
- Getting on and off your train
- Finding your seat
- Carrying luggage





Assisted travel is free and available to anyone who needs assistance due to a disability or older age. You don't need to have a railcard.

There are 2 types of assisted travel schemes:



1. Book before you travel. This is where you have made arrangements before you travel.

This is called **Passenger Assist**.



2. **Turn up and go**. This is where you have not booked assistance before you travel (even if you have booked your ticket).

Knowing about the schemes



We asked people if they had heard about the Assisted Travel Schemes.

We found that:

- 7 out of 10 people who might use **Passenger Assist** have never heard of it
- 8 out of 10 people who might use 'Turn up and Go' have never heard of it



Leaflets on assisted travel should be provided in racks at every station with staff.

These should be:

- In plain english
- Available as an easy read version



There should be posters about Assisted Travel Schemes at stations.





Question 1: How can rail companies improve the way information about assisted travel is given?



Question 2: Are there any reasons why information should not be in plain English?



We also think that:



- Information about the Assisted Travel Schemes should be easy to find on every railway company's website



- The railway company websites should be more accessible to people who find it difficult to use or understand websites



- Railway companies should ask groups of disabled people to check that people can get the information they need



- Railway companies should make it easier to book assisted travel



- Railway companies should involve disabled people in checking that the way you book assisted travel is easy to use



- You should be offered the chance to book assistance when you buy your ticket online



Question 3: What should railway companies do to make their websites more accessible?



Question 4: How can rail companies use **social media** to tell more people about assisted travel?



Social media is new ways to share information online using apps like Facebook, Twitter or Instagram.



Question 5: Should rail companies give information about assisted travel with one click from their website's home page?



Question 6: Should people be able to book assisted travel at the same time that they book their ticket?



We also think that:



- Rail companies should put information about assisted travel in places like:

- Doctor's surgeries



- Shops



- Local support groups



- Pharmacies



- Rail companies should work more closely with organisations that work with disabled people



Question 7: How can rail companies make more people aware about Assisted Travel Schemes?



Question 8: How can rail companies work more closely with organisations that work with disabled people?



Improving the schemes



We talked to lots of people who booked their assistance in advance using **Passenger Assist**.



We also asked people to test the **Turn Up and Go** scheme and to tell us how they found them.



Most people said they were either satisfied or very satisfied with the way the schemes work.



But one in five people said that they did not get all the assistance they booked.

One in eight people did not get any of the assistance they had booked.



People had problems with:

- Staff turning up late



- Information about the passenger who needed help not being passed on from one station to the next



- Some railway companies performing better than others



- Getting off the train. One in five people who asked for help getting off the train did not receive it.



Question 9: How might we improve the way information is passed from one station to another?



Question 10: Would new rules for rail companies make the service better passengers who need the Assisted Travel Schemes?





What should happen when Assisted Travel Schemes don't work?

We thought about how the passenger should get compensation when Assisted Travel Schemes don't work.



Question 11: Should rail companies refund the cost of the journey if assistance does not work properly?



Question 12: Should rail companies write their own policies for giving passengers compensation when Assisted Travel Schemes don't work?



Staff training



Most people say that the staff who assist people were very good.



But staff do not always find people with hidden disabilities.



Occasionally, staff are not always as helpful as they could be and get annoyed with people asking for assistance.



Different railway companies give different amounts of training to their staff.



Question 13: How can different railway companies give the same good training to their staff?





Question 14: How often should disabilities training take place?



Question 15: Should there be rules about including disabilities training in staff training programmes?



Question 16: Should there be agreed standards of disability training for railway staff?



Better checking



We want railway companies to get better at checking that their Assisted Travel Schemes are working properly.

We think that railway companies should:



- Include more information about accessibility when they collect information about complaints



- Check that the right staff training takes place



- Provide more information about how the Assisted Travel Schemes are working



Question 17: What information should be collected about how the Assisted Travel Schemes are working?





Question 18: How should we get better at checking that Assisted Travel Schemes are working well?



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Question 19: Are there any ways that we could use new computer systems to check how Assisted Travel Schemes are working?



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Disabled People's Protection Policy



A Disabled People's Protection Policy is a plan about how a rail company should make sure that disabled people can use their railway safely.



Each railway company has to write a Disabled People's Protection Policy and make it available to its customers.



The Office of Rail and Road has to check each company's Disabled People's Protection Policy.



We are thinking about the best way to help rail companies write their policies, so that they provide a better service and people understand what is on offer.



We will take account of the ideas that come from people answering the questions in this document.

Thank you



Thank you for your ideas.



Please now post your answers back to:

**Consumer Policy Team
2nd Floor
Office of Rail and Road
One Kemble Street
London
WC2B 4AN**



or email them to:

DPPP@orr.gsi.gov.uk



Please send them back by:

31 January 2018

Easy read by Easy-Read-Online.co.uk

Consumer Policy Team
2nd Floor
Office of Rail and Road
One Kemble Street
London WC2B 4AN

31 January 2018

Dear Sir or Madam,

London TravelWatch is the statutory body representing transport users in and around London.
Thank you for inviting our views.

Below are our responses to your questions. If you have any further queries please let me know.

Regards

Cllr Stops

Chapter one - Raising passenger awareness

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

We agree with the channels proposed.

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

No. They must be clear.

Q3. What steps can be taken to increase website accessibility?

The national Rail Enquiries site comes high up on Google searches and has all the information, but it's a bit dull and doesn't do a good job of promoting passenger Assis. This should be improved.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Real life examples would be good with a direction to the NRE page.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

We think this is important and should be on the home page.

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

This would be welcome.

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

It would be great to have a recognisable symbol that directed passengers to the NRE page that, as stated above, should be improved.

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

No view

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

This is outside of our knowledge.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

One of the significant issues with passenger Assist is that it is designed for passengers travelling from one station to another and perhaps interchanging to a third within a station. There is no recognition that travelling via London needs a greater amount of assistance and coordination. Allowing LUL to exclude themselves from this process means that they are not involved. Nothing is on their website to explain what Passenger Assist is and how passengers might access it.

Whilst LUL and London Overground are very good at assisting passengers on a turn up and go basis there are some passengers that need the reassurance that they can actually book assistance and it will be provided. A passenger from outside of London will have no idea that a turn up and go service is available to them. There is a whole gap in the system for passengers crossing London.

Turn up and go may well be great for regular London disabled passengers, but it is no good if you need reassurance and are an infrequent traveller.

There should be a new workstream for Passenger Assist to deal with cross London interchange

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes

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

No

Chapter three – Strengthening staff training

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

A single curriculum that evolves over time.

Q14. How frequently should disabilities training take place and its content be refreshed?

No view

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

We would expect high standards of training to be delivered by all operators

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

We would very much support the evaluation of disability awareness etc. training.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Not relevant

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

No

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

No view

Chapter five – Reviewing DPPPs

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

Yes

Q21. Do you agree with our proposed approach to reviewing DPPPs

Yes

Merseyrail response to ORR consultation on improving assisted travel

1. How can rail operators' improve the availability and promotion of Assisted Travel information in stations?

Our network benefits from having almost 100% coverage in terms of staffed stations which means our customers in need of assistance routinely turn up and go. Our people are trained to deliver assisted travel there and then. Historically of course this has meant that booked assistance levels have been very low and tended to be restricted to customers travelling further afield onto other networks.

Over the last 12 months however, we have seen an increase in booked assistance, we believe this is due to a disrupted year on our network with major engineering work affecting the Wirral lines for six months and the start of the year, the closure of Lime Street station in the middle of the year and industrial action throughout. Customers understandably are turning to our customer relations booking system to ensure they can travel during this disruption.

With this in mind we are reviewing our booking office windows in early 2018 to ensure that some reference of how to get help and book assisted travel is present. We believe this will help to increase awareness of our services to customers who don't currently use them.

Given the service we already offer we don't believe any further on station advertising is required at this point.

2. Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

For the reasons stated above, we don't currently offer passenger facing leaflets or posters regarding assisted travel other than those mandated by our DPPP. We will ensure any communication that is included in windows relating to assisted travel as a result of the work we are undertaking is in plain English.

We do agree with RDG and would support an industry standard label of Passenger Assistance to replace the numerous terms in use. The ORR's title of this consultation, Assisted Travel could be one such suggestion. We believe this will be both simpler to understand for customers and help to manage expectations appropriately.

3. What steps can be taken to increase website accessibility?

We believe that the ORR already has a robust mechanism in place for ensuring the industry continues to deliver improvements in website accessibility. TOC's across the UK were in June 2016 required to respond to an audit of train company websites against the retail information Code of Practice and website accessibility review. The latter being conducted by experts in both accessibility and website design.

In our case Merseyrail responded proactively to the suggestions made by the experts and implemented the recommendations in full.

We would suggest this positive example of collaboration between experts, regulators and industry is the best way to achieve continual improvement supported by active monitoring of the DPPP where appropriate.

4. How can rail operators use social media to increase awareness of Assisted Travel?

At Merseyrail we use our social media service to both promote our network and to act as a triage point for customers who contact us. We currently signpost customers who contact us through social media to our assisted travel service team, who are best able to support their needs. We are currently up skilling our social media team to be able to provide assistance at the first point of contact rather than having to make this signpost. The team are currently being trained to use industry systems in order to offer this service. Our aspiration is that customers at some point in the future will be able to book assistance through our social media service. We believe that this will help raise awareness within our customer base.

In terms of promotion more broadly, we would welcome a nationally led social media campaign of promotion via social media promoting the good work done by TOC's in supporting customers with assisted travel needs.

5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

We don't believe so. For several years now this area has been within 1 click of the Merseyrail homepage.

6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

At present the only direct way passengers can purchase tickets for travel on our network is by visiting one of our booking offices or by using one of our small number of TVM's. Clearly customers may also buy tickets from third parties or other TOC's for use on our network.

Merseyrail do not currently retail online or by phone. Whilst we may have aspirations to do so in the future this does currently present a challenge to us in terms of linkage between assistance requirements and ticket booking.

We do not believe it is possible, without significant investment in technology for our retail process and the booking of assisted travel to be brought together to a level that would make it a reliable service for customers. We also believe that due to our high levels of station staffing, such a process is unnecessary on our network. The vast majority of our customer needing assistance simply turn up and receive it – purchasing their ticket whilst doing so.

7. How can rail operators' improve the availability and promotion of Assisted Travel information to third-party agencies?

As part of the 2016 Wirral Loop Line Track Renewal project, we adopted a new approach to customers with assisted travel needs. Mindful of the disruption was likely to be more acutely felt by customers with disabilities we engaged with our client Merseytravel's disability forum, a group of representatives from organisations that support a broad spectrum of disabilities. We worked with those organisations to get out the message about the key changes to public transport with the aim of reaching what can be a hard to reach audience. This included traditional tactics such as providing printed materials together with less orthodox activities such as organising a trial run for disabled customers of the amended bus replacement routes for the works and event recording a podcast, which reached over 5000 blind and visually impaired

people across the city region. This proved extremely popular with those customers we reached out to and we believe forms a strong foundations for our relationship around assisted travel going forward. We believe that building stronger relationships between the railway and the communities it serves is at the heart of this on both a local and national level.

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

See response to Q7

9. How might the reliability of communications be improved?

As detailed in the consultation document, RARS will make a significant difference to most TOC's. We do not believe however that we currently have an issue on our network with communication around assisted travel. Given the nature of our network, we know that most journey completed are to and from Merseyrail stations – this provides a different dynamic to many other networks nationally. We also benefit, as discussed earlier in this response, from a near 100% coverage of our network by staff booking offices. This together with a well-established manual process for dealing with this situation means that the potential for assistance not to be delivered is extremely limited. We know from our monitoring of complaint rates, that volumes are extremely low which clearly given our relatively high rate of turn up and go customers is pleasing and indicative of a robust approach. Given this strength of our current arrangements we therefore would be reluctant to change to any model of delivery that does not deliver at least an equally high quality of customer experience.

We do however, see a need for the industry as a whole to look at the interchange points between operators where we know from the research that the majority of the risk of failure exists and would welcome and digital tool or formalisation of industry working practices that supports this aim.

10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

See response to Q 9.

11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Under our current gesture of good will arrangements, our customer relations service will provide the customer in question with a voucher to the full value of the ticket for the leg of the journey affected should we fail to deliver what is promised. As mentioned above this is a fairly rare occurrence. We intend to continue to offer this where appropriate. Clearly this is in addition to customers rights under the CRA, where we fail to deliver our products with due care and skill.

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

See response to questions 11. We do not believe there are any barriers, but do believe every case should be assessed on its own merits by the TOC concerned.

13. How can consistency in training for company staff across the industry on disabilities be achieved?

It is clear from the recent research that planned assistance is being delivered, generally speaking with a good level of consistency. As an operator that delivers a large number of unbooked assists per year, we understand the challenges of maintaining consistency of experience at short notice.

Supporting our customers with disabilities forms parts of a range of mandatory training courses that our frontline teams undertake on a 2 year rolling basis. This includes our Disability awareness, and Travel safe programmes. The content of this training is, as you would expect, regularly reviewed by our OD team to ensure it captures the requirements of all relevant legislations, our regulatory obligations and the principles of any best practice guidance such as DPTAC. We believe this produces robust training for our staff and helps support the delivery of a high quality and consistent customer experience.

We would suggest that the current ORR methodology of ensuring that disability training is taking place is sufficient but could be supplemented by ensuring that the principles within best practice documents/frameworks are being delivered as part of that training.

14. How frequently should disabilities training take place and its content be refreshed?

We currently deliver training on a two year rolling cycle to all customer facing staff. We refresh this training periodically where legislation, regulation or best practice changes. We believe this is proportionate. Front line staff are then assessed on a 2-yearly basis as part of our competency framework.

15. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

We think that the principles behind good quality care of those that need assistance are already captured through the DPPP process. These are the principles we use to train our staff as a minimum standard. We don't believe a mandatory framework would offer value – how training is delivered should be a matter for those professionals delivering it, but we do welcome the principles being adopted.

16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

At Merseyrail we already operate an internal training quality verification framework. This approach offers multiple layers of quality monitoring where by staff are observed carrying out key duties by an appropriate manager. These regular assessments of competency are then verified within their own function by a more senior manager to ensure quality before being reviewed by a senior manager from another operational area to ensure organisational consistency. We believe this provides a robust mechanism for measuring the quality and effectiveness of the training being delivered.

We would therefore question the value of the implementation of an external process, potentially at a significant cost. We believe the focus would be more effectively placed on ensuring that operators have robust internal mechanisms in place to measure training effectiveness relevant to their own services.

17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

We don't currently collect any further data.

18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Other than those suggestions made earlier in our response, no.

19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

None that we are currently considering.

20. Do you agree with our proposed approach to updating the guidance?

We welcome that the guidance is being updated and agree with the proposed approach.

21. Do you agree with our proposed approach to reviewing DPPPs?

We agree with the removal of the requirement to review the DPPP annually with the introduction the licensed operator annual review.

Passenger Assist Consultation – Office for Rail and Road

- Muscular Dystrophy UK is the charity for **70,000 children and adults living with muscle-wasting conditions**. We provide vital information, advice and support to help people live as independently as possible. We accelerate progress in research and drive the campaign for access to emerging treatments.
- Trailblazers is a group of young disabled campaigners from across the UK who **tackle the social issues affecting young disabled people, such as access to higher education, employment, and social and leisure opportunities**. We aim to fight these social injustices experienced by young disabled people and to ensure they can gain access to the services they require. We are part of Muscular Dystrophy UK, the leading UK charity fighting muscle-wasting conditions.
- We welcome the opportunity to submit written evidence to the consultation, and wish to draw particular attention to helping those who have muscle-wasting conditions to enjoy independent travel regardless of their disability.
- ‘Muscular dystrophy and related neuromuscular conditions’ is an umbrella term used to describe 60, mostly genetic conditions that cause the weakening and wasting of the muscles. All these conditions are serious and progressive, with effects that range from mild to severe disability and premature death, most typically in childhood or early adulthood. **Approximately 70,000 people in the UK are affected by one of these conditions.**
- The All Party Parliamentary Group (APPG) for Young Disabled People, for which the Muscular Dystrophy UK *Trailblazers* provides secretariat support, **released two reports, both called End of the Line in 2009 and 2016, which together summarised the issues faced by *Trailblazers* in using public transport networks.**

Background to the End of the Line campaign

- Nearly two thirds of survey respondents have experienced problems getting on a bus owing to the attitude or behaviours of the driver or fellow passengers.
- Half of respondents have been unable to get on a bus because the ramp was not working.
- More than half of respondents have been unable to travel on a bus because the wheelchair space was taken up by buggies.
- Over a quarter of respondents say they have been refused service by a taxi driver, purely because they are disabled.
- Over half of respondents have experienced difficulties in booking a wheelchair accessible taxi.

1. How can rail operators improve the availability and promotion of Assisted Travel information in stations?

We spoke to our Trailblazers regarding the leaflets which outline what services they could expect to receive from Assisted Travel. None that we spoke to were aware of these leaflets. We would suggest that this information should be available online so that disabled people can access it while booking assistance. Leaflets and posters will also be useful, but perhaps need to be more prominent in stations, including given out by assistance staff to those who have not received one or who are unaware of the services that can be provided.

2. Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

We believe all information should be of high quality and reliable. So long as the lack of a Crystal Mark standard does not affect the quality, reliability and accuracy of the information provided, then it is not necessarily required.

3. What steps can be taken to increase website accessibility?

We feel it is important to understand that not all disabled people access websites in the same way, and make adjustments accordingly. Many disabled people may only access websites on their smartphone while others may use eye tracking technology integrated with dedicated hardware. Making accessibility information available at the forefront, but also ensuring that the website, and all the information available on it, is fully accessible on all platforms is essential. Use of screen readers for those with visual impairment is also an essential tool for many people with disabilities, and therefore all websites and images on websites should be compatible with screen reading software.

4. How can rail operators use social media to increase awareness of Assisted Travel?

We support many young disabled people at Trailblazers, but on a wider focus at Muscular Dystrophy UK we support adults and older individuals. A broad spectrum of these individuals use the rail network to get to and from work, hospital appointments and social outings with friends and family. With this in mind, it is important to remember that disabled people are a diverse community, and so not all of them will be able to access social media.

However, for the vast majority of young disabled people social media will be the place they turn to for both socialisation and information. Ensuring that local train stations regularly post links or videos on their social media channels explaining what can be offered through Assisted Travel, as well as ORR would be the best way to ensure that adequate reach is achieved.

5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

We believe that this is a sensible move in the right direction so that information is available at the point of purchase. While we do not have expertise in the running of such a programme, it does not sound like there should be any significant barriers. In addition, it should vastly improve the understanding of the Assisted Travel programme among disabled people who are actually planning to travel in the near future.

6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

We believe that this is the obvious next step to increasing uptake of Assisted Travel. However, we also strongly suggest that no time limit be put on how far in advance you must book. Some of the young disabled people we support are now not booking Assisted Travel as they feel that they get the same standard of service, regardless. In addition, some feel it impinges on their autonomy and ability to be spontaneous or change travel times. However, the majority of Trailblazers prefer to book their assistance. Most have told us that the ability to book tickets and assistance online at the same time is their current preferred option.

In terms of booking Assisted Travel for those who choose to do so, at the point of purchase is the best opportunity to do so. Whether this is online or in person at the station, the facility to book assistance should be available at all points of purchase and should be as simplified as possible.

7. How might the reliability of communications be improved?

Our Trailblazers have told us of many instances where communication breakdown caused issues with their journey. The most frequent of these was actually between stations where a wheelchair user requires a ramp to alight.

In airports dedicated teams of assistance staff are responsible for helping travellers get on and off the airplane. While this model still has issues, it is generally a successful option. Therefore, we would suggest the use of a dedicated team of staff at staffed stations is essential so that the communication is not being lost. We would also suggest that the use of app-based technology which a disabled traveller can use to alert staff that they are nearing their destination and need assistance in case of delay or changed travel plans would be the next step in improving communication.

In addition, some wheelchair users have suggested that train drivers be made aware that they are on board and the station they are getting off at so that if staff do not come with a ramp, they can stay at the station. It is hoped that this would result in preventing disabled people from ending up at the wrong place or in an inaccessible station.

8. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Yes. Assistance protocol should be standardised across all areas of public transport to ensure a smooth, inclusive journey for all disabled people. Trailblazers are happy to assist in the development of any such policies.

9. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes. Some stations and rail operators already operate this, and so there is some confusion as to when this is offered. It should also be offered if a normally

accessible station is not accessible on the day of travel due to a broken lift, for example. In addition to refund, they should also pay a taxi or bus for the remainder of the journey.

We'd also like to draw attention to the phrase 'was not provided as requested'. This phrase is quite ambiguous. If this was defined as assistance not happening at all, or not as planned or maybe left waiting on the train then the views of disabled people may be different. In our view, if travel is different than a non-disabled persons journey due to an assistance failure, then redress should be applied.

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

No, but any individual redress policy should be above the standard set. This is where an industry wide assistance protocol for disabled passengers can get a minimum standard which is acceptable, but other operators can increase this to a higher level if they feel the need to do so.

11. How can consistency in training for company staff across the industry on disabilities be achieved?

Firstly, it is important to make it clear that we believe all disability awareness training should be conducted by disabled people. This is another area where an industry wide assistance protocol should be utilised to ensure that a set minimum standard of training is always achieved.

12. How frequently should disabilities training take place and its content refreshed?

The semantics surrounding disability, and also the technology used to assist people with disabilities can change at a reasonably fast pace. Indeed, some Trailblazers told us that assistance staff did not understand that pushing their wheelchairs may be dangerous or impossible if they do not ask first. Training for personal assistants for disabled people is updated yearly, and we would recommend a similar schedule for all assistance staff.

13. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

DPTAC are an important part of keeping the transport system accessible to disabled people, and overall improving that accessibility as time moves forward. We do believe that all guidance should be followed from DPTAC. However, the document itself is almost 10 years old, and due consideration should be given to this if it is not updated as part of the Accessibility Action Plan review.

14. Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this, e.g. ORR, DPTAC etc.?

Yes, all training should be audited. In addition, we believe assistance services itself should be audited. This encourages improvement, but if a report is released by the ORR it will also give disabled travellers an idea of the type of services they can expect in certain areas. This transparency is essential for disabled people, and provides a motive to improve for stations and rail operators.

15. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

We would like to refer you to our End of the Line campaign, which has released two reports on the state of accessible travel for disabled people using the public transport network across the UK. You can find the reports at:

<http://www.muscular dystrophyuk.org/campaign-for-independent-living/trailblazers/campaigns/what-we-campaign-about/public-transport/>

16. Beyond our current planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

At Trailblazers, we have carried out secret shopper exercises with our network of young disabled people as part of our End of the Line campaign. We believe direct, lived experience of disabled people travelling is the best way to understand the current situation. Disabled people themselves are often able to offer simple solutions to any problems they experienced. Trailblazers would be more than happy to assist with these efforts.

17. Are there any technological innovations, programmes or initiatives beyond those described above which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We mentioned app-based technology as the next logical step to improving accessibility on the public transport network for disabled people. The use of this technology, if an industry wide standard is agreed, could feed back a rating of the journey and explain anything that went particularly well, what did not go well and how it could be improved next time. We cannot stress enough that other options must be open, but for many young disabled people this will both simplify the assistance process and also provide monitoring information and act as a 'digital comments box'.

18. Do you agree with our proposed approach to reviewing DPPPs?

Yes, but we would ask that reviewing and updating DPPPs is done in consultation with disabled people themselves. Trailblazers would be happy to assist with this.

If you have any queries about the contents of this evidence you can contact us:

Michaela Hollywood, *Trailblazers* Campaigns Officer

NORTH EAST ACTION ON TRANSPORT – RESPONSE TO THE OFFICE FOR ROAD AND RAIL'S CONSULTATION ON PASSENGER ASSISTANCE

1. Foreword

The North East Action on Transport – or simply NEAT – is an independent user-led focus group which looks at issues involving all forms of transport. The group consists of an informal mix of visually impaired individuals and organisations such as "Newcastle Vision Support", "Gateshead and South Tyneside Sight Service", "Northumberland Low Vision Action Group", "RNIB", "Guide Dogs for the Blind" and "Nexus". The aim of the group is to make public transport accessible for all visually impaired people within the Tyne & Wear and Northumberland regions by collaborating together between individuals - the transport users - and organisations and ensuring that a range of transport issues can be made accessible and beneficial for all visually impaired people and other disadvantaged groups.

The operations of NEAT are of an informal nature. The group holds meetings on a regular basis – usually bi-monthly – where every member is given an opportunity to have a voice in key decisions around what they want out of their public transport system. NEAT is currently overseen by representatives from two local organisations: These are "Newcastle Vision Support" and "Gateshead and South Tyneside Sight Service". These representatives act as chairs in group meetings and take responsibility engaging with transport bodies and local authorities, working in partnership with other charities and organisations and encouraging NEAT members to be involved in all discussions and activities. What makes NEAT stand out from other groups is the people that get involved with it: They are visually impaired people that come from different parts of the North East; bring a vast range of knowledge and experience of using transport through their visual impairment; or through the different methods of transport group members use on a daily basis and as means to get to group meetings. It truly is a group for all. They also give up their time to be able to represent the interests of visually impaired transport users in Tyne & Wear and Northumberland whenever they attend meetings or events.

NEAT has been honoured in participating in transport consultations previously. This has included a campaign by the "RNIB" on providing better access on buses; a government consultation on access to transport as a whole; and a campaign on shared public spaces and reducing barriers and obstacles for visually impaired people. NEAT wishes to contribute to this consultation as many of our members - as well as many other visually impaired people according to the research - use rail as a regular form of transport. Using trains, trams, light rail and subway networks are a vital link for visually impaired people to get around and helps to be as independent as possible, whether they use it to get to work or a hospital appointment, see family

and friends or as a transport connection, for instance using a train to travel to an airport so they can take a flight to a holiday destination. As part of travelling by rail, many visually impaired passengers will request assistance in some way as their restricted vision can make it a challenge to get on or off a train, find the right platform, find the right seat or purchasing a ticket as examples. The way in which passenger assistance is provided to visually impaired people helps to make their journey run smoothly and to avoid confusion and stress. Therefore it is important for this consultation to look at how passenger assistance is provided and ensure that any improvements recommended can cater for all visually impaired people at every stage of a rail journey. Our response to the consultation will look at each question which has been asked, giving recommendations for each section while also using research to highlight key points that should be addressed.

2. Raising Passenger Awareness

Summary of research findings:

The North East Action on Transport understands that for a disabled passenger, awareness of assistance that is available to them can make a huge difference in whether they travel by rail or not and it can also affect a person's confidence in being able to make a rail journey. Having reviewed the consultation document, we can clearly see that the ORR has outlined areas for improvement in raising awareness of the service, which in general we are in agreement with. The research indicates awareness from station staff or word of mouth is the main source of information. From a visually impaired person's point of view, it is one of the main ways of obtaining information due to the fact that written information will not always be accessible to them.

Of course, there does indeed need to be other ways to provide information on passenger assistance, particularly the provision of "alternative formats" for those who cannot read standard leaflets. For example, Easy Read leaflets, stripping out any unnecessary details or images, Large print text documents, braille leaflets or even audio formats such as CD or MP3. NEAT also believes that the ORR should consider whether the locations of the DPPP leaflets are indeed that accessible to visually impaired passengers and whether there should be a more accessible location they can put them instead of an information point or a ticket office. The ORR should also take care when considering the provision of passenger assistance information on the internet. Not all visually impaired people will have access to the computers, tablets and other technological devices which many of us take for granted, nor will they be able to see the information shown on screen. NEAT recommends working alongside organisations such as the Royal National Institute for the Blind (RNIB) in enhancing rail operating websites so that information on

passenger assistance can be read by visually impaired people using accessibility tools such as screen readers. Additionally, the ORR should consider the method in which the information should be presented. Our group members have found that using PDF files from the computer cannot be fully read or accessed by screen readers and therefore would be better presented as a “Microsoft Word” document or even a simple audio file which preferably should be freely available on the web page.

Answers to consultation questions:

1. Rail operators should consider two main factors which ORR could ensure they are addressed: Firstly, suitable locations in which visually impaired passengers can easily access them, for instance near the front entrance of a station. Secondly the variety of formats in which both DPPP documents and having them widely available in all staffed stations. This should include easy read documents, large print, braille and audio. These should be made available at all times alongside the standard size leaflets on racks on given on passenger request.
2. NEAT is in fact for the passenger facing documents to have the “Crystal Mark” or an equivalent standard because simple, concise information is highly beneficial to disabled passengers who struggle to read print or may not fully understand them. NEAT would also recommend that the documents also aim for an Equality Standard as to ensure your policies can be accessed by all disabled people.
3. The ORR and Rail operators should continue to engage with organisations that support disabled people so that they a better understanding as to making their websites accessible for visually impaired and other disabled people, particularly when booking tickets and passenger assistance. NEAT recommends avoiding the use of PDF files as sources of information and focus on having information directly on the web page or as a “Microsoft Word” document or in an “alternative format” like large print.
4. Using social media is a good idea but rail operators should take care not to overemphasise its use. Not all visually impaired people will understand the structure of social media sites and may prefer finding information directly through the operator’s website or in person.
5. NEAT welcomes the focus for having passenger assistance being “no more than a click away” and advises that the use of “drop down menus” and multiple web pages should be avoided so that it does not become a challenge for visually impaired people to book passenger assistance on the internet.
6. NEAT would welcome a case for having the assistance booking process alongside the ticket booking process as a way of simplifying the web page and booking experience for visually impaired people. The main barrier is that many people only notice about the passenger assistance at the end of

the booking when they have purchased the tickets. Therefore perhaps it can be incorporated when a person selects the appropriate rail card option on the booking process and then asks whether they require assistance for their journey.

7. While NEAT doesn't see a big issue in distributing assisted rail travel information to third party organisations, we advise the ORR to take care as to which organisations to contact. Public services like libraries and health services, GPs and hospitals (including eye clinics) would be ideal organisations to attract the attention of disabled people. Additionally working alongside organisations that work with disabled people can help to share the information while also advising on making it accessible.
8. In order to provide the assistance and service for a disabled passenger, it is important to understand the disability itself. NEAT recommends that rail operators should undergo disability awareness training from disability organisations to help them do this while also understanding how they can adapt to situations such as travelling and accessing information on the internet so then they can provide concise information on assisted travel in a variety of formats.

3. User Experiences and Improving Reliability of Communications

Summary of research findings:

The research conducted by the ORR clearly indicates that many disabled passengers – including visually impaired – that have used passenger assistance for rail journeys were satisfied with the service they were given. Providing this level of satisfaction not only means that a visually impaired person is more confident in travelling by rail but also opens a whole World of possibilities. They may depend on some form of assistance when travelling by rail, but in a way it makes them less dependent simply because it allows them to use trains like anyone else.

However, the research also indicates that there are significant gaps in the provision of passenger assistance. Providing information of what exactly a visually impaired person requires when travelling by rail is key in providing an efficient service. The Assisted Travel Service and station staff must have clear plans in place to ensure that all aspects of the service can be carried out. Failure to do so can be chaotic for a visually impaired person and have a big impact on their confidence. It also brings difficulties in finding the right platform, getting on and off a train (especially judging a gap between the train and platform) and finding the right seat, all of which many visually impaired people will find hard to do on their own. Staff at stations will also find it beneficial to undergo disability awareness training so they understand what

kind of challenges visually impaired people will face at a station and what are the best methods in providing assistance.

There will also come a time where problems will occur at the very beginning of the service when passengers enquire about booking tickets and assistance for their journey. Many of our NEAT members tend to book train journeys by telephone, mainly because they do not have the skills and equipment to allow them to use website to make rail bookings. However, for them, the telephone booking process is often complicated by the fact that it isn't possible to book a ticket, seat reservation and passenger assistance all within a single phone operation. Therefore in order for a train journey to be booked, a visually impaired passenger may have to make at least 2 or 3 separate telephone calls to different parts of the rail network, causing stress and confusion for the passenger. While NEAT has noticed this problem with some rail operators, we have started seeing examples of good practice. According to our members, "Virgin Trains" who operate both the east and west coast mainlines are able to assist visually impaired passengers with tickets, reservations and passenger assistance all under one telephone booking showing that a passenger's needs and requirements can be arranged within one convenient service. This is something which NEAT would like to see rolled out across the rail network and hopes that the ORR can communicate with rail operators to ensure all matters of a train journey – including passenger assistance – can be booked under one phone call while also helping them to deliver a robust and user friendly service where visually impaired passengers may have not been able to access elsewhere.

Because of the errors that are evident within providing assisted rail travel, more should be done to enforce strategies to delivering on all passenger assistance requirements. The North East Action on Transport would support an industry protocol to help address the gaps within the system and also recommend requirements in the provision of information and deliver training on assisting visually impaired people. The protocol should also ensure that every rail operator and the assisted rail travel service should have regular contact to ensure a better flow of information from the booking or enquiring to the actual journey made. NEAT also feels that measures should be in place for all incidents where assistance is not provided and the staff responsible is held accountable and disciplined appropriately.

Answers to consultation questions:

9. The ORR should encourage all rail operators to communicate with each other and the assisted rail travel service and regularly check this to ensure that a disabled passenger's journey requirements is met at all stages of the journey by all relevant staff, especially at the station. This could mean requesting rail operators to assign a member of staff to be responsible for delivering and monitoring the assistance provided for passengers.

10. NEAT believes that it is certainly worth the ORR considering a cross industry protocol because it would ensure communication between all parties involved with passenger assistance and making sure that all assistance requested can be delivered. If a cross-industry protocol were to be put in place, NEAT recommends having mandatory disability awareness training being implemented; minimum requirements on accessible information provision and strengthening disciplinary protocol when passenger assistance is not provided to the satisfaction of a disabled passenger.
11. NEAT certainly believes that some form of redress is needed when passenger assistance is not provided. It would be difficult to see all rail operators to commit to offering a full refund if such an incident occurred, so it may be a better idea to have more adequate mobility assistance in place during a delay, cancellation or removal of a train. Providing such a service must include meeting the visually impaired passenger at the station, guiding them from first train to the second train, ensuring the passenger is comfortably seated on the train and ensuring a fellow assistant will meet the passenger at the destination or interchange point.
12. If a cross industry protocol were to be enforced – which NEAT would support – the ORR can then set minimum requirements for redress policies for all rail operators to adhere to such as partial refund on tickets or the cost of onward travel. They can then advise rail operators on setting up their own redress policies.

4. Strengthening Staff Training

Summary of research findings:

In order for rail operators to provide an efficient assisted travel service for its customers, its staff must show their understanding on disabilities and the difficulties one could face when travelling by train and that this must be evident through the service they provide. Delivering quality training is key for this happen and is something NEAT regards very highly. Our group members strongly believe that the best way to learn how to deliver support and assistance to a visually impaired person is to learn from them themselves because, as a visually impaired person, they know first hand what their condition is, how it affects their daily routine and how they can overcome it, including when travelling.

The research conducted by the ORR clearly indicates that they and the rail operators are taking appropriate steps in ensuring their staff and managers undergo training in order to help them deliver reliable passenger assistance to disabled travellers. Having said this there are also several challenges which are highlighted around staff

training which may partly explain why passenger assistance is not always provided in full. The research shows that rail operators conduct training which covers as many disabilities and conditions as possible. That's good, but the problem they seem to face through the training is identifying certain disabilities, particularly those that are classed as "hidden" or "invisible". NEAT believes the problem lies in the way society perceives a disabled person, especially by the way they see them. For instance, it's easy to spot someone with a physical impairment as they would regularly use mobility equipment such as crutches or a wheelchair. But when you meet someone with a learning impairment, you would often struggle to recognise that unless you'd interact with them in some way, otherwise they will look like an ordinary person to you. This is also the case for those who are blind or visually impaired. Some people will use aids such as canes or guide dogs to help them get about and so gives us evidence that they have a sight impairment. But not every visually impaired person will use these aids, nor will all of them have the same range of vision – there are many sight conditions which affects people differently. That's why having a first hand understanding of disabilities and interacting with a disabled person themselves is vital within staff training so rail staff can use that knowledge within the service they provide. This then ultimately allows visually impaired and other disabled travellers to use the rail network without having to worry about being perceived wrongly by staff.

While NEAT understands that staff training can take a variety of forms and that rail operators have the flexibility of choosing what is ideal for their staff, we wish to express our concern of the use of e-learning within awareness training. E-learning may seem to be an easy and simple way to deliver training where staff can learn in their own time and pace, but the big disadvantage is that there is only so much you can learn in this way. Because disability is such a broad topic, it will be easy to miss certain aspects of this through e-learning. The other disadvantage is that staff will not be able to see for themselves how a disabled person finds rail travel a challenge or the physical barriers they face. This would be difficult to present through a PC screen.

Therefore NEAT strongly believes that the ORR makes recommendations to all rail operators to minimise the use of e-learning within awareness training and take a more practical or classroom based learning approach instead. In this way staff and managers can learn together and support their colleagues when required. It may also even encourage communication between teams when it comes to organising and delivering the right assistance for a disabled passenger. The practical learning will also allow companies to engage directly with visually impaired passengers and disability organisations to provide a more first hand learning experience.

Answers to consultation questions:

13. The research has indicated that the type of training around disability awareness and what they learn from them varies between rail operators

and staff teams. NEAT recommends that all rail operators follow a single standard training procedure for all staff to follow, regardless if they have direct involvement with disabled passengers or not. This training should more of a class based learning style where they are able to gain an in depth understanding of the different disabilities and have the opportunity to engage in practical sessions from disabled trainers. The use of e-learning should be avoided. Training should also be conducted in a regular time frame recommended by the Rail Delivery Group and form part of rail staffs' work routine so that knowledge on disabilities remains fresh in the minds of the staff providing passenger assistance. The ORR could be responsible for monitoring these factors and ensure rail operators conduct training that is relevant and regular.

14. Having consulted the report provided by the Rail Delivery Group. NEAT believes that its recommendation of refresher training every two years is reasonable. This then ensures that rail staff providing passenger assistance have the appropriate knowledge and skills to deliver the right support for a visually impaired passenger and also helps to keep a high quality standard of service which, undoubtedly, is what rail operators require.
15. The Disabled People's Protection Policy Guidance should undoubtedly include a mandatory disability training framework which then helps all staff that work with disabled people the chance to obtain the knowledge and understanding required to deliver the assisted rail travel service. The proposed training framework should make requirement that all major disability types should be covered – including physical, learning, hearing, visual and hidden – and that rail operators should undergo training from a disabled trainer or disability organisation at the initial training process and consider it for the refresher stage.
16. Once again, the issue arising here is the fact that disability is a complex and broad subject. So a benchmarking exercise, while certainly plausible, wouldn't be highly beneficial in ensuring disability awareness training is of a sufficient standard. It may be better for the ORR to consult with inter-government departments like the DPTAC or national organisations that work on specific disabilities to understand how a quality standard could be reached and also have an idea as to how training should be run, what it should cover and how it's quality should be monitored.

5. Strengthening Monitoring

Summary of key findings:

Delivering the assisted rail travel service is vital not only to disabled passengers but the entire rail network as a whole. That's why it is important for organisations like the

ORR to monitor and evaluate all aspects of it: from training up staff to the booking and delivery procedure to the way which they receive feedback.

The ORR's report indicates that the Disabled People's Protection Policy outlines the areas of the assisted rail travel service which should be covered during the monitoring and evaluation process. NEAT believes that the ORR and the rail operators are taking the right steps to monitor the delivery of assisted rail travel. We are also pleased to see that all rail companies – where applicable – contribute to the ORR's monitoring by providing adequate data from their own accounts when providing passenger assistance, particularly when it comes to how many of their staff have undergone training, how many passengers they have served and the quality of the service. NEAT does question however why different companies are taking different approaches within monitoring the quality of their service and why they are not all looking at this. Surely this is something that all rail companies and governing bodies can work on together to ensure all operators can provide the best travel experience out of the service for disabled passengers. NEAT recommends that an organisation like the ORR be responsible for ensuring that all rail companies are accountable for presenting qualitative data and encourage operators to work and communicate with each other to ensure this can be made possible.

Of course, if a passenger assistance goes wrong or if a problem occurs, it can be a nuisance for a disabled passenger and they will be more than likely to complain. So it is good to see that the ORR is constantly monitoring the various complaints that are made and asks rail operators to regularly send report on this. The types of complaints they monitor cover most aspects of a passengers journey which shows the ORR is indeed considering how the whole passenger assistance can be improved rather than just the journey itself. It is also pleasing to see how they are willing to broaden and strengthen how they obtain data in this area. NEAT suggests looking at these additional complaint areas:

- Accessing the train station including entering and exit and accessing local transport
- How a staff member greets and communicates with disabled passengers, both on a verbal and physical scale
- Making connections and accessing assistance at interchanging points – particularly when at big stations when passenger may have to change between trains from different operators
- Providing assistance during a delay or train cancellation

Answers to consultation questions:

17. NEAT is unsure of what other data is collected apart from those specified in the report and believes that both the ORR and rail operators are collecting relevant data from visually impaired and other disabled passengers to assess how well passenger assistance is being provided and how they could improve for each disability if problems occurred.
18. In order for accurate, succinct data to be recorded and monitored, all governing bodies and operators need to be working in sync. The ORR should make a requirement that all rail operators should provide data on all aspects of the assisted rail travel process to be used for monitoring. This should include the level or type of disability they served, what training has been provided and what disabilities have been covered, what support has been provided and the level of satisfaction for each disability.
19. NEAT believes the way in which the ORR complies monitoring on assisted rail travel and collects data is more than sufficient. Looking at using other methods such as technological programs or initiatives for example will only make things more complicated and may bring more issues or problems for the service rather than solving those problems. Furthermore it may be one reason why the rail operators are using different methods to collect their own qualitative data where they should be working together in order to provide the same quality of passenger assistance across the entire rail network.

6. Reviewing DPPPs

Summary of key findings:

Assisted Rail travel forms a major part of the Disabled People's Protection Policy, making it a highly important document for rail operators. With the advancement of technology, travel equipment and a better understanding of disability, the report makes clear that the policies need reviewing regularly so that it will help in shaping how assisted rail travel is provided, which NEAT agrees with. To ensure that these policies are being reviewed and the right material changes are made to benefit the passenger assistance service, there needs to be a monitoring system in place to make sure rail licensing bodies are following the right procedures in their reviews and report changes on time. The fact that the ORR wishes to share responsibility with the rail operators in reviewing the policies may help to relieve pressure on the rail network and also give the operators the freedom to focus on delivering a full satisfactory service for its disabled passengers.

Answers to consultation questions:

20. It is surprising to see that the guidance document for the Disabled People's Protection Policies have not been adapted for many years, nor have they been fully acquired by the ORR. NEAT does agree that an update on the guidance document is needed with great importance. The updated version should make clear that it now reflects the views and standards of the ORR; make clear the requirements and expectations for any new rail operators or change of licenses and refer to the "Equality Act" as its basis. Having said this, it is worth considering maintaining the guidance set out by the "Department for Transport", not only because most of the standards will be relevant but due to their governance status.
21. NEAT does agree to an extent with the ORR's reviewing proposals for the DPPP's although we do recommend considering the following. If the rail operators were to be given the power to review their own policies, the ORR will need to ensure they do this on a regular basis – a period of every 1 or 2 years is recommended. If an operator chooses to make material changes to the policy, the ORR will need to set out a plan as to how they will approve it and give a reasonable period of time for the operator to complete these changes.

7. Key Points & Summary:

Below is a summary of the main comments and suggestions NEAT have raised which we wish the Office for the Road and Rail to consider as they continue with the consultation:

- **Passenger awareness & information** – It is important that you can engage with as many disabled passengers as possible, especially those with a visual impairment. Any important documents such as the Disabled People's Protection Policy or passenger assistance information should be available in a variety of accessible formats and be made widely available at the station on request as well as online. Any electronic versions of documents should be made in a Word document format instead of a PDF. NEAT suggests contacting individual passengers directly to understand the preferred documents formats they would like and would be able to read.
- **Booking passenger assistance** – Disabled passengers should have the freedom to book assistance for their train journey without any challenges. They should be able to book the assistance at the station or on the internet through the proposed "One click from the homepage" system on a rail

operator's website. It would be good to see all rail operators being able to offer rail tickets and passenger assistance in the same booking.

- **Use of technology & apps** – NEAT urges the ORR to take care when considering using apps or technological devices to provide information on or as part of the assisted rail travel service. Not all of our group members are able to use mobile devices as they struggle to see the information on the screen. So while this may sound like a good idea. We recommend considering the use of alternative formats such as large print, braille or audio CD to provide information on the service.
- **Training of Staff** – NEAT suggests that training on disability awareness – especially around physical, visual, hearing, learning and hidden impairments – should be undertaken by all staff and managers of all rail operators, regardless of the amount of customer interaction they will receive. The training should be the form of a class learning based environment and undertaken as part of an employee's work schedule. We also recommend undergoing training from a national organisation that works with a particular disability and engaging with disabled passengers to understand the difficulties they face when travelling by rail.
- **Monitoring collection of data and service performance** – NEAT is mainly for the ORR's proposals in monitoring how data is collected from rail operators and licenses and agrees that there should be more work sharing between operators and governing bodies. The ORR should also encourage operators to ensure their staff communicate with each other so that a consistency in quality can be maintained through the assisted rail travel process, all the way through the initial booking to accessing the station and staff member and boarding and alighting the train. This will then help to increase strengthen the quality of service that is provided to disabled passengers and also help staff to understand how they overcome challenges and complaints which disabled people face when travelling by rail.

Overall, the consultation report shows that when it comes to disabled rail passengers, there have been good and bad practices used when providing passenger assistance. The Office for Road and Rail has proved through vigorous research that many disabled people are satisfied with the assistance received. Of course there has also been no shortage of problems that have occurred. We find that the main problems tend to be inconsistency of the delivery of passenger assistance between rail operators and the perceptions some staff have around disabilities, especially those that are difficult to define. Therefore there needs to be a focus on delivering appropriate, regular training on disability awareness and enforcement on ensuring rail companies provide information available to everyone, all staff have the knowledge to provide the service and reporting to the ORR on the satisfaction of service they have received. This can only be achieved by the rail operators and governing bodies working in unison since they are all working towards a similar goal.

NEAT has made our comments and suggestions in this report with a view that we can support the “Office for Road and Rail” and its many partners in understanding what it is like to travel by rail with a disability and how it can be better by working together and understanding the issue at hand. We are confident that the ORR will consider our findings going ahead so that a better rail experience can be provided for visually impaired and other disabled people on a local and national scale which is what we hope to see. By working together, we can ultimately give more visually impaired people in the UK the chance to travel more confidently by rail and give them a vital part of their independent lives.

**THE NORTH EAST ACTION ON TRANSPORT
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29 January 2018

Network Rail's response to ORR's consultation on improving assisted travel

31 January 2018

1: How can rail operators improve the availability and promotion of assisted travel information in stations?

Network Rail agrees with ORR that information about assisted travel should, as a minimum, be available at staffed stations. We also suggest that passengers should be able to access this information from a similar location within each station to provide consistency across the network. We therefore propose that the industry should agree whether passenger facing assisted travel information will be made available in leaflet stands, at ticket offices, or elsewhere.

We also support the promotion of assisted travel information via other mediums in stations, such as posters or customer information screens to provide brief information and direct passengers to where they can find more detailed information about the available services. In order to provide network-wide consistency of information included in posters, we propose that these are developed as part of a nationally co-ordinated programme.

Network Rail also believes it is important to more clearly and consistently highlight the location of mobility assistance meeting points, particularly in busy stations. This would help passengers who are already intending to use passenger assistance (booked or unbooked) to meet a member of staff, and would promote awareness of the availability of assisted travel in the station. Network Rail is currently in the process of developing clear, consistent signage for our managed stations.

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

Network Rail agrees that it is important that passengers are provided with high quality communication. We also believe that the quality and language of communications should be consistent across the network. Network Rail supports the principle of all rail operators making documents as accessible as possible. It is important to highlight that much of the language relating to rail travel, even in passenger facing documents, is industry specific and therefore it will be important that rail companies are able to maintain the meaning and accuracy of documents. We suggest that Easy Read or similar would be more appropriate than Crystal Mark, as Crystal Mark standard may require the replacement of words and phrases that are integral to the meaning of the document. Notwithstanding this, we believe that mandating the achievement of any particular standard would not be a proportionate response unless there is clear evidence of industry failure to provide accessible information.

Network Rail would also like to highlight that the application of a standard may create a lengthy editing and approval process. It will be important that passengers are provided with the most up to date information when it is available, and an extended approval process may impact rail companies' ability to quickly update passenger facing documents as policy and information evolves. Rail companies should maintain control of their own documents, with passenger feedback driving continuous improvements.

3: What steps can be taken to increase website accessibility?

Network Rail agrees that passengers or potential passengers should be able to access high quality information relating to their rail journey. Network Rail has applied World Wide Web Consortium (WC3) web content accessibility guidelines to achieve AA standard on its website. We recommend that the industry agrees on a minimum standard of WC3 website accessibility (A, AA or AAA) to be consistently applied to all rail companies' websites. This will help rail companies to address website accessibility issues such as graphic and text colours and introduce alternative tools such as 'read me'. We believe that ORR should use its position as the industry's regulatory body to highlight the achievement, or exceedance of such standards as good practice. This will allow rail companies to recognise, share and continue to improve on best practice.

We recognise that it could be useful to adopt the auditing and testing of websites by charities (such as RNIB as mentioned by ORR in its consultation) or user groups. We believe it is important to consider the outcomes of such testing alongside other guidance, so that rail companies can consider a wide variety of accessibility challenges when making any improvements to the accessibility of websites, not just those of a specific user group.

4: How can rail operators use social media to increase awareness of assisted travel?

Network Rail supports the use of social media to increase awareness of assisted travel. As with written communication, we believe that it is important to provide passengers with clear and consistent communication. We therefore propose that promotion of assisted travel via social media should be co-ordinated nationally. This would provide each rail company with consistent content to include in social media promotions alongside links to the relevant (company specific and national) webpages.

5: Are there any obstacles to providing assisted travel information no more than ‘one-click’ from rail operators’ website home pages?

Network Rail agrees that information about assisted travel should be easy to find on rail companies’ webpages. We believe that an intuitive, easy to use website is more important to improving accessibility than making lots of information available from the home page, therefore we do not support the proposal to require assisted travel information to be available in no more than one-click from website home pages. In some cases, making assisted travel information available within one click of the home page could lead to a busier, more confusing webpage. For example, too busy a home page may compromise the user’s ability to zoom in and still see the whole menu bar without scrolling, which is considered good practice in accessible web design. It may also require smaller font sizes to be used to fit all the required information on the home page, creating a less accessible website. We therefore support ORR’s suggestion of making assisted travel information accessible via an easily understandable term. Where practical, we recommend that rail companies should seek to include the information under the same section of their websites, for example within the ‘Travelling with us’ section.

6: Should the ticket buying process be intrinsically linked to assisted travel booking? Are there any barriers to doing so?

Network Rail believes that an appropriate technological solution would be required to successfully integrate the ticket buying process and assisted travel booking.

Linking assisted travel bookings to the ticket buying process could create a complex decision matrix which technology would need to be able to consider. For example:

- A wheelchair user should be able to book both a wheelchair space and a seat for use under one ticket. However, currently the ticket buying process would require two tickets to be purchased to allow a passenger to book both.
- The amount of time between booking tickets and travelling may impact the assistance options that are available for the journey, particularly at stations with no staff, where notice would be required to re-locate assistance employees.

Any such technological solution would need to be industry wide. Specifically, ticket selling agents aside from rail companies themselves (for example, the Trainline) would need to be able to access the same booking system. If passengers could only book tickets with assisted travel via the rail companies’ websites, this would restrict disabled passengers’ ability to obtain the same discounted travel as other passengers.

We also highlight the risk that intrinsically linking the two could compromise the integrity of the assisted travel booking system. If the assisted travel booking process were linked to the ticket buying process, it may increase the likelihood of misuse of assisted travel bookings. This could potentially divert assistance resources from those passengers that genuinely need it.

7: How can rail operators improve the availability and promotion of assisted travel information to third-party agencies?

Network Rail believes that the promotion of assisted travel services should be done alongside the industry’s wider promotion of rail travel, and should be delivered clearly and consistently. We would also support additional promotion via some of the mediums suggested in ORR’s consultation (such as written material

available in local shops) where this would be beneficial in increasing awareness for passengers. As with other forms of promotion of assisted travel, we would support a national approach.

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

While Network Rail supports the principle of rail companies engaging with third party agencies, we would like to highlight that the development of partnerships may only provide rail companies with a narrow understanding of the types of accessibility challenges faced by the wide variety of passengers we serve.

Alternatively, we propose that third party agencies are engaged through wider industry forums. This would allow rail companies to seek an understanding from a wide range of disability interest groups, and would allow the development of policy and service standards to be consistent across the industry, rather than one rail company focusing on the needs of a single, or a small number of, specific groups.

9: How might the reliability of communications be improved?

Network Rail agrees that the reliability of communications is important to give passengers assurance that they will be able to make their journey successfully. We believe that bi-lateral communication would provide passengers with more reliable information, and more confidence in assisted travel services. The continued development and introduction of technological solutions such as apps could provide this functionality. For example, bi-lateral communication could allow station employees to notify passengers that they are aware of their arrival, and the expected wait time for assistance in disembarking the train. In order for such technological solutions to be successful, connectivity issues in stations will need to be addressed.

Network Rail recognises that a technological solution will need to be supported by improved processes and training to maximise the potential of any system that is introduced. While technology is being developed, we believe that rail companies should continue to improve their processes and training through the sharing of best practice. We also believe that forms of communication around and within the station can be improved, such as signage and information points, to clearly indicate areas such as meeting and information points.

10: Would a cross-industry protocol overcome the difficulties experienced by assisted travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Network Rail understands that the industry is already working to develop a protocol for passenger assist on Driver Only Operation train services. We propose that the scope of this protocol could be expanded to address the challenges experienced by assisted travel users. We believe that a protocol would be beneficial in setting out the fundamental arrangements around assisted travel services, and that rail companies should retain the flexibility to continue to improve the level of service that is provided to passengers. For example, a protocol might set out *what* key steps should be delivered through the assistance provision process, and a rail company should be able to determine *how* it delivers those steps.

Network Rail supports the proposal for RDG to play a leadership role in this area, to provide national consistency in the arrangements that are included in a protocol.

11: Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

As Network Rail does not have a direct financial contractual relationship with passengers, we would not be in a position to provide a refund. As a public sector organisation we have obligations in respect of Managing Public Money which constrain our ability to make non-contractual ex gratia payments. We currently have arrangements in place with train operating companies to provide assistance at our managed stations, and review these arrangements when required to ensure that they remain fit for purpose and provide passengers with required assistance. We also suggest that the consistency and completeness of national records,

particularly relating to unbooked passenger assistance, would need to be improved across the network for rail companies to be able to fully assess claims made for refunds.

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

Network Rail believes that rail companies should have the flexibility to continue to improve service levels for their passengers, and that ORR should use its position as industry regulator to highlight examples of best practice. If operators introduce their own redress policy that proves to be of benefit to passengers, we suggest that ORR highlights this good practice. This is likely to continue to improve overall industry service levels.

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

Network Rail can see the benefit in agreeing a set of industry training standards for assisted travel services. While each rail company needs to train employees in accordance with their own policy, we believe that alongside a cross-industry protocol (discussed above), training employees in a consistent way could provide employees with key skills, such as listening and understanding and enhanced customer focus, to continue to improve service levels nationally. We suggest that the industry seeks to agree on a core set of training standards, and rail companies are able to integrate this into their own training programmes. For those elements that all rail companies are committed to include in training programmes. We suggest that a bank of trainers is created and used to provide a further level of consistency.

Network Rail recognises that Disabled Persons Transport Advisory Committee (DPTAC) has produced a training framework, however we believe that it requires further development if it is to remain fit for purpose. We believe that any framework adopted by the industry should reflect current legislation, modern applications of inclusive service, and provide flexibility for continuous improvement of training programmes.

14: How frequently should disabilities training take place and its content be refreshed?

Network Rail provides inclusive service training for all new station employees. After the initial training, employees can refresh their training either voluntarily or by nomination. As we regularly review the content of our training programme, employees regularly receive additional training on the introduction of any new content, for example British Sign Language, lip reading and dementia training.

Network Rail proposes that the content of training programmes should be reviewed and, where necessary, updated every two years. We believe that this is an appropriate amount of time to allow training practices to embed and to gain insight on the success of the training. In addition to regular reviews, we believe that any emerging best practice should be incorporated into training as soon as it is appropriate.

We also believe that rail companies should set out the arrangements for identifying a need for refresher training for any specific employee. We suggest that minimum standards for this should be agreed across the industry, for example where behaviour has been reported as a safety risk or where there have been an increased number of complaints within a certain station.

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

Network Rail believes that if there were a framework in place which reflects the modern rail industry and provides rail companies with flexibility to continue to improve their own training programmes, it would be appropriate to refer to it within DPPP guidance. We suggest that any framework is subject to a regular review process, and that it is efficiently updated to reflect new legislation, standards and industry best practice. Without this, there would be a risk that the framework becomes out of date, and therefore requiring compliance within the DPPP guidance would be counter-productive to improving service levels for passengers. We do not believe that rail companies should be penalised for continuing to be innovative in training standards, therefore we suggest that the framework is considered guidance and not a mandatory element of the DPPP guidance.

16: Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this e.g. ORR, DPTAC etc.?

Network Rail believes that it would be useful for ORR to observe current training across the industry and identify best practice, as it does with other commitments within DPPP. Areas of good practice could then be incorporated into an agreed industry training framework. We believe that ORR is best placed to fulfil this role, either directly or by appointing a specialist organisation. We would also support ORR highlighting areas of good practice in publications as it does with other DPPP commitments. Network Rail would welcome ORR's attendance at a company training session to observe our current programme.

17: We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on assisted travel. What further data is currently collected?

ORR already receives data from across the industry relating to activities on assisted travel. We recognise that the development of a technological solution by RDG is likely to enable the industry to collect more detailed data in a consistent way, and Network Rail supports this. As well as the quantitative data shared with ORR, Network Rail receives qualitative feedback from the Built Environment Accessibility Panel on the overall delivery of assisted travel service across the industry. We have found that this qualitative data complements other data that we assess performance against. This data is also used by HS2.

18: Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to assisted travel?

Network Rail proposes that ORR's existing monitoring should allow it to undertake a risk based assessment of how well licence holders are meeting obligations in relation to assisted travel. We would propose that ORR's resources are focused on addressing any identified shortcomings which are highlighted through the existing monitoring arrangements. This could be achieved by understanding the reasons for an identified shortcoming against DPPP commitments, for example through focus groups or providing passengers the opportunity to communicate with ORR directly. Alongside national data analysis, we believe that this will allow ORR to focus its resources on regulating the highest risk areas.

19: Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our assisted travel or DPPP compliance monitoring in the long-term?

The proposals described in ORR's consultation and responses from the industry will provide an extensive forward programme of improvement initiatives alongside the ongoing work by RDG to develop a technological solution. Network Rail believes that this will help the industry to deliver improvements to processes and service levels and does not have any further proposals at this time. We suggest that as the programme is developed and delivered, it would be useful for ORR to maintain regular communication with passengers and the industry so that any further proposals can be considered.

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

We agree with the approach set out by ORR in its consultation to update DPPP guidance to:

- Ensure that it refers to current legislation and best enables operators to comply with their equality duties
- Update on any areas where technology has changed, for example the use of social media or apps
- Restructure the document to more clearly set out minimum requirements
- Reflect changes arising from responses to the issues raised in the earlier chapters of ORR's consultation
- Highlight good practices that go over and above the requirements of these minimum standards.

21: Do you agree with our proposed approach to reviewing DPPPs?

We agree with ORR's proposed approach to reviewing DPPPs only where there is a material change to the content. We support the proposed targeted and proportionate approach.

We also suggest that it might be useful for ORR to share examples of 'material changes' to DPPPs across the industry to help provide clearer guidance to rail companies on what would be considered material.



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Office of Rail and Road
One Kemble Street
London
WC2B 4AN
25 January 2018

Dear Office of Rail and Road,

Assisted Travel Consultation

This submission is made on behalf of the National Pensioners Convention (NPC); Britain's largest pensioner organisation representing around 1m older people, active in over 1000 affiliated groups across the UK. The NPC is run by and for pensioners and campaigns for improvements to the income, health and welfare of both today's and tomorrow's pensioners. We welcome the opportunity to set out our views in this consultation and are very supportive of your statement "to empower confident use of the railway by all". Our responses are laid out below.

Chapter one - Raising passenger awareness

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

A simple way to do so would be to display. Large posters in prominent positions telling people they are legally entitled to free assistance when travelling, at all times trains are running. This could be backed up by a TV advertising campaign or information given to older groups, local forums and other places where vulnerable people might be. No doubt local press and local radio are good mediums if one wishes to contact older people.

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

Whilst the DPPP which has to contain specific complex commitments, is usually worded very carefully in order to minimise the legal and compliance risk on the operator it is true to say The DPPP Guidance needs updating. Older people appreciate clear and concise communication and Crystal Mark may well be a good way forward.

Q3. What steps can be taken to increase website accessibility?

There is of course an obligation on all TOCs to meet website standards. The needs of older users with regard to simplicity of layout and speed of response time is very relevant. Complex websites are confusing to older users. Allowing adequate time for people to respond without being "timed out" is also important.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

By use of Twitter: Simply pin a tweet to their Twitter feed which says 'Did you know you are legally entitled to free assistance when travelling, at all times trains are running, including

luggage assistance, including at unstaffed stations?' Social media is important, but should never be used as the sole means of communication. Many older people have neither the means nor the wish to use Twitter or other social media platforms. Nonetheless they are important tools if used in an easily understood way.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'oneclick' from rail operators' website home pages?

Many people have not embraced IT sufficiently to make full use of this. In any event train companies cannot deliver accessibility now with any degree of reliability.

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

There are many barriers through no fault of Train Operators but created as technology in various aspects proceeded at different speeds and without reference to each other. For example, people travelling in central London do not buy a ticket as they are using contactless payment - or a Freedom Pass. Basically without knowledge of technological changes proposed it appears there are many barriers.

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

Quite simply, by the printing of more leaflets, by sending more staff to events etc. As stated earlier by use of local radio and other outlets, free papers etc which are widely used by older people.

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

Like many obstacles only adequate staffing will overcome problems. Staff that is with time and knowledge to engage re accessibility issues. Some operators do, but many do not simply because there is no requirement in Franchise Agreement to demand the liaison.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

For older people, communication through the presence of staff – at the station and on the train – is the best and most effective means – and the one most trusted by older travellers. Much research exists that proves older and disabled people value the presence of uniformed staff above all else. The industry has no difficulty at all in providing 100% reliable communications between locations and/or trains - it does so with signalling and train movement generally and is indeed one of the assumptions made in the prognosis that Guards are not needed to protect the Train itself when halted for whatever reason. Therefore, if that same fail-safe approach could be implemented re Assisted Travel extraordinary levels of reliability could be achieved.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

It is certainly possible for RDG along with the RSSB to produce an industry wide protocol. Continuity and consistency across the TOCs is vital to the confidence of older and indeed vulnerable disabled people to travel. However, any such arrangement must be from the point of view it is good for the industry and not that this is the minimum requirement to discharge the obligations. There is the danger of what might be described as a lowest common denominator approach.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating

their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes.

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

There are no legal obstacles; it is a matter of judgement as to whether different redress policies help when the emphasis in this exercise is about industry wide standards. Common and straightforward policies across TOCs are important to give older people the confidence to pursue redress where necessary.

Chapter three – Strengthening staff training

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

A common template or standard setting out the basic components of training is a key requirement. This must include awareness of issues affecting older people. Local older people's groups, forums and meetings could be asked to help with the training sessions.

Q14. How frequently should disabilities training take place and its content be refreshed?

On a regular basis, depending on the role of different staff groups, either annually or biennially would seem appropriate. For those in direct contact with disabled travellers, initial training must take place before they start work and be refreshed on an annual basis.

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

Without knowing detail of DIPTAC standards it is not possible to give a detailed answer as noted above, a mandatory requirement for training which can be monitored and assessed is highly desirable.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

As noted above, consistency and continuity are particularly important to older travellers. Anything that promotes this is to be welcomed. Independent verification of the quality of training would be welcome – consistency across different operators is of paramount importance to disabled and older travellers.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

It is a regrettable fact that very little record is kept of Assisted Travel, be that journey successfully assisted or not. Improve the present arrangements so that people can come to rely upon their delivery.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Frequent and consistent monitoring and enforcement will help to give older people the confidence to travel. In other responses to consultation NPC has pointed out that there is often a failure to regulate the performance of Train companies. The ORR should start taking action against operators who breach their DPPP -there are no examples available to indicate whether the ORR has taken any enforcement action against operators. Examples have been given of RIVAR Regulated trains running under Driver only operation calling at Unstaffed

stations. If no action is taken it calls into question the need for monitoring? Special reports have been submitted based upon the experiences of three travellers. Copies can be provided of the report which highlights this point.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term? Chapter five – Reviewing DPPPs

As stated earlier, there should never be over reliance on technology as a substitute for human interaction. One approach that might succeed would be for the ORR to test proactively the robustness of an operator's DPPP, when anecdotal evidence or complaints are available that the operator is unable or unwilling to comply with regulatory or legal obligations.

Q20. Do you agree with our proposed approach to updating the guidance?
Please ensure that older people are an integral part of the process.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

It is essential that the review process is not simply a tick box exercise and that it involves people with disabilities. DPTAC has a key role to play here and their involvement should carry weight with ORR. Please ensure that older people are an integral part of the process.

P.G.Rayner FCILT FIRO Assoc IRSE MCIM
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January 2018

Rail Delivery Group

Response to ORR's *Improving Assisted Travel: a consultation*

Date: 30th January 2018

Rail Delivery Group response to consultation: Improving Assisted Travel: a consultation

Organisation: Rail Delivery Group

Address: 200 Aldersgate Street, London EC1A 4HD

Business representative organisation

Introduction: The Rail Delivery Group (RDG) brings together passenger train operators, freight train operators, as well as Network Rail; and together with the rail supply industry, the rail industry – a partnership of the public and private sectors - is working with a plan *In Partnership for Britain's Prosperity*¹ to change, improve and secure prosperity in Britain now and in the future. The RDG provides services to enable its members to succeed in transforming and delivering a successful railway to the benefit of customers, the taxpayer and the UK's economy. In addition, the RDG provides support and gives a voice to passenger and freight operators, as well as delivering important national ticketing, information and reservation services for customers and staff. taxpayers and the economy. We aim to meet the needs of:

Our Members, by enabling them to deliver better outcomes for customers and the country;

Government and regulators, by developing strategy, informing policy and confronting difficult decisions on choices, and

Rail and non-rail users, by improving customer experience and building public trust

For enquiries regarding this consultation response, please contact:

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¹ *In Partnership for Britain's Prosperity*, RDG (October 2017):
<http://www.britainrunsonrail.co.uk/files/docs/one-plan.pdf>

The consultation response

Increasing access to the railway and supporting more people to travel by train is one of our key commitments. Our customers have different needs and we know that small changes can be the difference between being able to travel by train or not. The industry's preference is always to remove barriers to independent travel so customers can travel without having to rely on manual interventions. We recognise that this is not always possible but can be improved through key funding streams such as Access for All and elements of the minor works fund.

In 2016-17, the Railway carried 1,7311 million passenger journeys, and of these, 1.2 million² journeys had pre-booked Passenger Assistance, an increase of 4.4% from the previous year. Many more journeys are completed without pre-booked assistance, where customers do not request assistance formally in advance before travel.

The Rail Delivery Group is committing to the delivery of a better experience for all of our customers. The vision is a railway which has the customer at the heart of every interaction and the capability to provide consistent and relevant experiences making it great for Britain, the Industry and customers.

Through the evolution of our insights model, the Customer Heartbeat, we know that Customers want, and deserve, easy travel from door-to-door. They want to plan, book and pay for journeys across different modes simply and without the need to understand complex rules about tickets, pricing or travel restrictions. They want to be kept informed during their journey and given timely, helpful advice on what to do when things go wrong. Some customers, however, require specific support to complete their journey and the RDG is striving to ensure this support is delivered consistently across the network to those who need it.

Jacqueline Starr, Managing Director Customer Portfolio Directorate

¹ http://orr.gov.uk/data/assets/pdf_file/0019/24832/passenger-rail-usage-2016-17-q4.pdf

² http://orr.gov.uk/data/assets/pdf_file/0005/24935/assists-factsheet-2016-17.pdf

Response to Specific Consultation Questions

Chapter 1 Raising passenger Awareness

The RDG understands, through independent research and through focus group discussion, that the current level of customer knowledge is low. Currently, the service is “advertised” primarily on-line via both the Disabled Persons Railcard website and individual TOC websites. Written information is also available. In addition, RDG works closely with Disability Action Groups to further promote assisted travel.

The service, currently provided nationally with our partners Northgate, is called Passenger Assist. This service is being redesigned, using insight from customers to deliver a transformed experience. We expect to pilot the new service later this year, in advance of a full deployment. In line with that launch we will rebrand the service and promote it nationally to ensure universal understanding. We will also use this as an opportunity to ensure consistency of branding – some operators use a different term which is unhelpful in terms of driving better customer understanding. RDG would support an industry standard label of Passenger Assistance to replace the numerous terms in use. The ORR’s title of this consultation, *Assisted Travel* could be one such suggestion.

We know that many of our customers, where possible, would rather travel without pre-booked assistance. The common term in use is “turn up and go”. RDG and its members think this term unhelpful as it creates a level of expectation in customers that might not be achievable. The industry would rather use the term “Unbooked Assistance” and then communicate what that means to customers. The RDG, with the support from its members, is now advertising where Unbooked Assistance can be guaranteed (with certain caveats). This information is published on station pages on the National Rail Enquiries (NRE) website.

Question 1: How can rail operators improve the availability and promotion of Assisted Travel information in stations?

The Disabled People’s Protection Policy (DPPP) ensures that all Train Operating Companies (TOCs) and Network Rail (NR) provide a Passenger Document entitled “Making rail accessible: helping disabled and older people.” This document is available on each TOC website and at their managed stations and it explains the service, called Passenger Assist, that is available to customers who need specific support to complete their journey. The information can be found on TOC websites and at the website for the Disabled Persons Railcard (DPRC). Many TOCs also produce a small card or leaflet with the details of Passenger Assistance attached to help promote the service. We know this isn’t particularly effective as it expects

customers to be aware of the service and to know where to look. In late 2018, the industry will pilot a new assistance service in advance of a full deployment. The RDG intends to market the service nationally and better promote through traditional and digital means. The industry works closely with a number of Action groups who will enable us to better promote the service to those that need it. The marketing campaign will be starting well in advance of the launch and will expect members to support the promotion.

Question 2: Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

The RDG sees merit in printing materials to the Crystal Mark standard but acknowledges that many TOCs prefer to use their own branding and tone of voice, and should still be allowed to do so. Customer information produced in written form should be compliant with appropriate standards which must not be compromised by branding.

Question 3: What steps can be taken to increase website accessibility?

The RDG plans to re-design the National Rail Enquiries (NRE) website and is in the process of creating the Business Case for that project. The desired outcome of the new site will be a “best in class information service” for all its customers. The website will be designed “around the customer”, accessibility requirements will therefore be captured through that process. At the very least our internal assurance processes will ensure compliance with agreed standards, however the nature of a design-led project may well mean that the site exceeds the standards in some areas. The new website will be delivered using Agile methodology and will be regularly tested on customer and user groups to ensure a first-class experience.

Question 4: How can rail operators use social media to increase awareness of Assisted Travel?

All TOCs and operators have active Twitter and Facebook feeds, as do RDG, and National Rail Enquiries. The RDG account is used primarily to promote and discuss wider industry policy and information, and NRE is used primarily to assist customers during disruption. That said, both are useful channels for the promotion of products and services and the RDG will be using Social Media as one of the channels to market the new Passenger Assist service.

The RDG recognises that although Social Media is an effective tool for the promotion of products and services it is not the panacea and therefore cannot be used in

isolation. A comprehensive campaign requires the use of all channels available to be effective across all customer segments – noting that a significant customer segment (older customers) are not regular users of social media.

Question 5: Are there any obstacles to providing Assisted Travel information no more than ‘one-click’ from rail operators’ website home pages?

Customer insight shows that a well-designed website (and app) presents information early in the user-journey. Good user experience (UX) will prioritise information so customers do not have to hunt around for what they want to see or do, this means that essential and/or common services are surfaced “earlier” than less well used services. Having a target of “one-click away” is a worthy ambition, however, not everything can be “one click away” as this may well compromise design and lead to a poor experience; the design process will strike the best balance in terms of the experience we offer all our customers – note that the teams are cognisant of the importance of Passenger Assist. TOCs will face a similar challenge when designing websites and apps.

Question 6: Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

Customer insights show that the separation of “assistance booking” and “buying a ticket” is a cause of huge frustration, as is the long lead time required to book in advance of travel. The new Passenger Assist Service will join these two customer journeys together enabling customers to do both in one single transaction. There are two significant barriers preventing this happening right now: first we need to integrate the Ticket Issuing Supplier (TIS) system with the assistance booking system; and second, we need to automate the processes supporting the allocation of assistance bookings to front-line colleagues across the network. Both barriers will be removed across the network as part of the new Passenger Assist project later this year and into next year. A number of TOCs have already reduced the lead time down to around 2 hours through automation but this is not consistent across the industry and requires significant investment from the operators to enable.

Question 7: How can rail operators improve the availability and promotion of Assisted Travel information to third-party agencies?

Many TOCs have relationships with local organisations but a concerted effort must be made on a national level to complement this local-level relationship. The RDG has a role to play, on behalf of its members, to better promote Assisted Travel. Much has

been done already. RDG has developed close working relationships with a number of Advocacy Groups, a number of whom are members of an Industry Governance group. However, a key challenge remains with regard to the identification and targeting of potential customers – those who, for whatever reason, choose not to travel by train. The Industry would welcome support from the ORR to identify these potential customer segments.

Question 8: How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be over-come?

The industry can reach out to its Disability and Advocacy Groups to enlist their help in advertising with third-party agencies. However, some third-party agencies may feel bombarded by other industries so the added value of advertising Assisted Travel in these third-party agencies should be established.

Chapter 2 User experience; improving the reliability of communications

Question 9: How might the reliability of communications be improved?

The RDG is confident that the introduction of the new Passenger Assist system can cover most of the points raised in this section. The new system will allow customers and staff to better communicate with and between each other, enabling TOCs and NR to better meet the needs and requirements of the customers. Disruption messaging will be as automated as possible with the various different internal communication channels in the industry feeding into the new system. RDG has led initiatives to improve Customer Information and is utilising this with trials across a number of TOCs, including Toilet Status Information on Customer Information Screens (CIS) at selected stations. The RDG is working on a project to make staff communication between stations more robust. This will be delivered later in 2018. It is important to involve users in the language that is used and RDG would support greater involvement from customer groups to ensure that the Real-Time Information language used throughout the industry is consistent and coherent.

Question 10: Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

The RDG aims to ensure a consistent experience for all customers across the entire network. It does this in a number of ways: by ensuring all members agree to a target vision, through the delivery of national/industry level projects, through oversight of industry activity and through collaborative governance. In the case of assisted travel, RDG plays a key role in ensuring systems and services are fit for purpose. RDG also brings members together to ensure, where appropriate, consistent delivery. Where the customer experience is inconsistent across the network, RDG work with members to overcome the barriers. In this instance, a cross-industry protocol may help however, of greater significance will be the automation of manual processes which currently drive inconsistency.

The RDG, with support from its members, is currently developing a new model to better measure and report on customer experience. The new model, called the Customer Heartbeat, will measure operational activity and customer sentiment against expectation and commitment (our Customer Promise) . The reports will better enable the industry to ensure consistency in experience.

Question 11: Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

The RDG, with the support of its members, believes that it would be appropriate to have a cross-industry policy regarding appropriate compensation should booked assistance fail to be delivered to the customer. Currently, it is unclear to customers what, if any, compensation would be awarded should the booked assistance fail to be delivered. Although the introduction of the Consumer Rights Act 2015 (CRA) has laid the foundations for possible compensation, dependent on circumstances, it is still unclear what the customer would be entitled to. The RDG is happy to lead industry discussions on this matter.

Question 12: Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?

Please refer to our answer above for Question 11.

Chapter 3 Strengthening staff training

The industry understands the importance of appropriate training for every customer facing role. The industry's own research suggests that staff continue to be a key driver in customer confidence and satisfaction, especially around those requiring assistance to travel. In 2014, the RDG, formerly as the Association of Train Operating Companies (ATOC) issued a detailed guidance structure for Disability Awareness Training for staff. This was intended as a minimum standard for staff training and TOCs were free to amend and support this training material with their own supplementary works. The ORR research rightly highlights the weaker nature of training for customers with hidden disabilities. The industry recognises this and has reached out to organisations which support people with various hidden disabilities in being able to train staff appropriately. It must be noted that although DPTAC provided guidance from 2008, this was often not concise enough to be used practically and is now in need of updating. The ORR should consider, with DfT support, having a single entity to monitor and support industry Disability Awareness Training. The RDG is working on creating an Accredited Training Programme for Disability Awareness, ensuring a standardisation of training across TOCs and staff. The RDG would welcome the support of publicly appointed bodies such as the DfT's DPTAC (Disabled Persons Transport Advisory Committee), Network Rail's BEAP (Built Environment Accessibility Panel) and Transport Scotland's MACS (Mobility and Access Committee for Scotland) to name a few.

Question 13: How can consistency in training for company staff across the industry on disabilities be achieved?

In support of ATOC's 2014 training materials, the RDG is working towards creating an Accredited Training Programme for Disability Awareness with the support and engagement of all training managers from TOCs. However, it must be noted that some TOCs have already completed rigorous training programmes for staff and this should be taken into account, especially considering Franchise Obligations when looking at introducing such a training package in the future. We would be expecting a mystery shopping programme to be put in place by the regulator to ensure the quality of the training provided to staff.

Question 14: How frequently should disabilities training take place and its content be refreshed?

The RDG supports its members' view that disabilities training needs to be relevant and up-to-date as far as practicably possible. Of course, TOCs would wish to train and refresh their staff's knowledge as often as possible. The industry would support

guidance from Disability and Advocacy Groups, as well as DPTAC and other bodies on how often this should be.

Question 15: Should adherence to the DPTAC training framework become a mandatory element to the DPPP guidance?

The DPTAC training framework was written and published about 10 years ago so would need updating before a decision is made regarding mandatory inclusion. In addition to a refreshed publication the Industry would need to have confidence that the content of the framework would develop in line with emerging customer expectation.

As well as DPTAC, it must be remembered that there are other public bodies advising government, such as MACS whose guidance can reach beyond their own borders and jurisdiction in the spirit of sharing of best practice for all customers on the National Rail network (England, Scotland and Wales.)

Question 16: Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this e.g. ORR, DPTAC, etc.?

The RDG would support an independent benchmarker and think that appropriate combination of the public bodies would be best. Perhaps an OFSTED style approach, as used in the Education sector, could be a blueprint for this.

Chapter 4 Strengthening monitoring

The RDG is pleased to support more robust reporting procedures regarding Passenger Assist and the quality of service received by customers in order to better help its members improve the Customer Experience for all customers. However, RDG must impress on the ORR the need to ensure that any new reporting mechanisms are robust and as automated as possible, and that the quality of the data received can be assured, especially regarding staff noting assistance provided. The current process is very manual and susceptible to changeable conditions on the ground with the potential to receive very skewed data, especially in regard to Unbooked Assistance.

The data would need to input into the new Customer Heartbeat measurement platform to ensure a consistent and comprehensive view of the entire journey. Any future monitoring conditions should therefore be discussed with RDG and licence holders to ensure the best possible outcomes for all parties involved.

Question 17: We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

The RDG does not currently collect other data regarding Passenger Assist apart from that which it sends every period to the ORR for DPPP licencing monitoring. Some TOCs do conduct mystery shopping and the RDG would support consumer bodies in collating data regarding this. This will not place an additional burden on TOC staff as the research will be carried out independently.

Question 18: Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licencees are meeting their obligations in relation to Assisted Travel?

The RDG, with support from its members is developing a model to better record, measure and report customer experience across the entire journey. The model will measure operational results and sentiment against customer expectation and industry commitment (Customer Promises). Understanding the relationship between this model and ORR activities will be important to ensure a consistent and comprehensive review. RDG will engage with the ORR throughout the project lifecycle.

Question 19: Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

See the answer to Question 18. In addition:

The new Passenger Assist system, being introduced later in 2018, will help to ensure that data collection is as automated as possible. As mentioned in the consultation document, it could be possible for the ORR to have read-only access to the system, subject to further discussions with RDG and its members. As some members have pointed out, the vast majority of our disabled and older customers who travel with us do not require any assistance and their feedback is currently not captured. The RDG would support an open dialogue with the ORR to find a way to capture this data which will help the industry to improve as a whole. Additionally, customers who do not use smartphones or email should be given opportunity to feedback their thoughts on the service received, and RDG would support further open dialogue with the ORR in this respect to find a solution.

Chapter 5 Reviewing DPPP's

The RDG is pleased to see the ORR's appetite in reviewing current guidance to DPPP's as the current guidance could be perceived as being out of date and does not reflect recent introductions in legislation, most notably the Equality Act 2010. Changing customer expectation is also not captured. RDG and our members would be very keen to be involved in helping to develop the new DPPP guidance which will help support its members and customers as fully as possible.

RDG would be keen to explore how the Heartbeat model could be used to ensure the DPPP remain relevant, in other words, regularly closing the loop between the DPPP, customer expectation and experience.

Question 20: Do you agree with our proposed approach to updating the guidance?

The RDG welcomes the proposed approach however, it believes that the guidance should become much more of a template and resource. There is very little to no standardisation in the way in which DPPP's are produced currently and having a templated version and a 'best practice' example would help in this regard. The current guidance also leaves the TOCs with little support in how they can deliver the customer facing leaflet, almost duplicating the process. The SLAs within the current DPPP need to be discussed as in many cases these are not practical for TOCs to deliver, leading to unnecessary friction between what is practical and what is expected. Should new SLAs be introduced in future after the new guidance is issued, the RDG believes that this should be discussed with the industry as one unit together as these could potentially impact current working practices and commitments made in franchises.

Question 21: Do you agree with our proposed approach to reviewing DPPP's?

The RDG welcomes the ORR's relaxation of submitting DPPP's for annual review, however, it does not see any additional value in an internal annual review. The RDG and its members would need to understand why the ORR is suggesting a need for an annual internal review of DPPP's. We would also support a much more streamlined consultation and review process in terms of duration. Any changes to a DPPP should be reflected in the current franchise obligations and it should be made clearer to customers what changes and improvements have been made, especially between the former and new franchise, irrespective of a change in franchisee.

Improving Assisted Travel: ORR Consultation

Response from Railfuture Passenger Committee

Chapter One - Raising Passenger Awareness

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

A1. Posters and leaflets in prominent positions in booking offices, waiting rooms and other station locations; Network Rail (NR) should assist in the display of publicity at those stations which they control. Much greater publicity on operators' and other rail ticket booking websites. Assisted Travel should be an option when booking online and on ticket vending machines (see also A6).

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

A2. They should certainly be written in plain English with no jargon and any technical terms explained. They also need to be focussed and to the point i.e. as short as possible.

Q3. What steps can be taken to increase website accessibility?

A3. Websites need to be more clearly structured and easier to navigate. Regular consultation with DPTAC and disabled persons' organisations should be undertaken, to ensure that they cater for disabled persons' needs.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

A4. Regular tweets, Facebook postings etc. need to be issued reminding passengers and relatives or friends of passengers of the Assisted Travel facility. These should be increased prior to popular travel periods e.g. Christmas/New Year.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

A5. There doesn't appear to be any reason why a prominent button could not be put on the home page which would take the user into an assisted travel booking form (see also A9). Current practice seems to be to discourage use of assisted travel by hiding the information away! For example, on the VTEC site, assisted travel comes under 'Journey Care', which is hidden away at the bottom of the page under 'Customer Services'. There is then another link to click before you reach a form.

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

A6. It should form an integral part of the booking process – whether online, through a ticket vending machine or in person. Some work is needed on websites and ticket machines to make this an automatic option, plus improving staff training (see also A13).

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

A7. The Rail Delivery Group (RDG) should help rail operators by producing and promulgating central guidance – either through operators or direct to third-party agencies - on the operation of the Assisted Travel Scheme and the importance of including prominent information on their websites.

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

A8. By keeping third-party agencies fully informed about timetable changes and changes to fares; these should include changes to disabled facilities at their stations; the RDG should also play a role here (see also A7). Contracts with third-party agencies need to build in the requirement to include an assisted travel option as part of the ticket booking process.

Chapter Two - User Experience; Improving the Reliability of Communications

Q9. How might the reliability of communications be improved?

A9. The booking process needs to be reviewed with the aim of streamlining it and reducing the number of questions. Telephone bookings under the present system can be lengthy and off-putting. People often make the same journey on a regular basis, so the information needs to be captured (subject to Data Protection requirements) to avoid having to repeat a lot of the information for subsequent journeys. The system needs to recognise that the assistance request may be submitted by someone else - a relative or friend – and that the person travelling may not be disabled, but simply elderly and carrying heavy luggage. Operators need to ensure good communication between each other where connecting and/or other transport services are being used e.g. by passengers crossing London as part of a through journey. All large stations should have a designated, well signposted, point at which Assisted Travel Users should wait for a member of staff to meet them. This is a particular issue where the user is escorted to the main line station concourse from the London Underground, Tram or Metro platforms or arrives independently e.g. by taxi or by a friend or relative dropping them off. The requirement to designate a suitable point on the station and the procedure to be followed should form part of the RDG guidance to operators and NR (see A10).

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

A10. Yes, this would certainly help. But direct communication between users and operators while on their journey would help to mitigate problems. Users should be provided with a telephone number they could call or text if their booked assistance does not arrive at the station; this is very important at unstaffed stations. The use of text messaging could be explored to warn passengers of any potential difficulties en route. RDG should play a key role in promulgating guidance and publicity to NR, operators and third-party agencies about the scheme. It should require NR and operators to put in place ongoing monitoring procedures and to publish regular reports on successes and failures.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

A11. Yes, fully support this approach.

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

A12. Not as far as we are aware, but central guidance from the RDG should ensure a consistent approach. There may be a need to link this with the operators' normal approach to refunds, which can vary.

Chapter Three – Strengthening Staff Training

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

A13. The RDG (in conjunction with DPTAC) needs to lead on a standard approach to training that all operators are obliged to follow. This should include emphasising that disabled passengers may have other types of disability, including autism, dementia or other mental health issues, instead of or as well as, physical disabilities. Users of the assistance scheme may not be disabled, but simply elderly and carrying heavy luggage.

Q14. How frequently should disabilities training take place and its content be refreshed?

A14. DPTAC advice should be sought, with recommendations drafted in conjunction with RDG and NR.

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

A15. The DPTAC Training Framework says that it is “designed to be used by all those involved in the delivery or commissioning of training for transport staff within the UK”. Unit 1 is entitled “Recognise Disabled Passengers and Assess Their Needs”. Adherence should therefore be a mandatory element of the DPPP guidance. However, since the guidance appears to have been prepared in 2008, it may need to be refreshed to take account of changes in legislation etc. since.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

A16. Yes. DPTAC or a professional body e.g. CILT should carry out the verification role. Performance is probably best measured by comparing results of the delivery of assistance.

Chapter Four – Strengthening Monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

A17. We are not aware of other data sources.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

A18. A small number of licensees currently have a franchise obligation to assess the quality of assistance they are providing to passengers. This obligation needs to be extended to all franchises and to NR; Open Access operators should also be encouraged to carry out such assessments. The results of the assessments should be made available to both DPTAC and Transport Focus.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

A19. The new Rail Availability Reservation Service (RARS) – once it includes assisted travel bookings as a part of ticket bookings - should enable improved compliance monitoring.

Chapter Five – Reviewing DPPPs

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

A20. We agree with your proposed approach, given the importance of taking into account legislative, technological and other changes since 2009.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

A21. We agree your proposed changes to the current review system for DPPPs.

Submitted on 30 January 2018 by Graham Collett, Joint Vice-Chair, Railfuture Yorkshire on behalf of the Railfuture Passenger Committee.



National Union of Rail, Maritime & Transport Workers

Response to the
Office for Rail and Road
Assisted Travel Consultation 2018

The National Union of Rail, Maritime and Transport Workers (RMT) welcomes the opportunity to respond to the Office of Rail and Road (ORR) consultation into Improving Assisted Travel. RMT represents over 80,000 members in all sectors of the transport industry. We are the largest union in the rail industry.

Executive Summary

If the intention of this consultation is to drive improvements then all actions or proposals by train operating companies that result in detrimental changes to Disabled Peoples Protection Policies have to be of concern to the regulators. The removal of staff from Stations and Trains can only increase the likelihood that disabled people will not have the same access to transport as everyone else enjoys, be able to go where everyone else goes and to do so easily. RMT believes the specific obligations in the Equality Act in relation to discrimination against disabled people must therefore be understood by the railway industry with the objective of ensuring the disabled person is provided with a service which is as close as it is reasonably possible to get to the standard normally offered to the public at large.

Background

Twenty one per cent (13.3 million) people reported a disability in 2015/16¹. A person is considered to have a disability if they report a long standing illness, disability or impairment which causes substantial difficulty with day to day activities. This is the core definition of disability in the Equality Act.

In each of the three years to 2015/16 mobility was the most prevalent impairment reported.

In mid-2017, just under half of working-age disabled people were in employment, compared with 81 per cent of working-age non-disabled people.

The Government will be publishing plans shortly to achieve their stated ambition to see one million more disabled people in employment in the UK by 2027².

More and more disabled and older people want independence. The demand for accessible travel and the expectation of always being able to continue travelling is much higher than in previous generations. Although the railways have traditionally been geared up to offer "assisted travel", with help from railway staff at stations or conductors/Guards on-board trains, the introduction of human rights legislation, equality law and anti-discrimination provisions have meant people are more aware of their rights. Whilst BR and then the privatised rail companies have encouraged disabled passengers to book this assistance in advance by ringing a dedicated helpline, or by alerting the operator that they will need assistance when booking tickets on-line, many passengers still do prefer to travel without assistance, valuing their independence and freedom to do so.

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/600465/family-resources-survey-2015-16.pdf page 7

² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/664563/industrial-strategy-white-paper-web-ready-version.pdf page 123

RMT strongly believes the opportunity and right to 'turn up and go' is a good thing and the industry has got to adapt to this societal change, provide help when requested, but also strive to be easily and fully accessible for all without any notice.

To put it simply people with disabilities are not expected to ring the supermarket in advance if they need assistance with their shopping. Why should they always be expected to book assistance when travelling by train?

Driving Improvements?

The ORR states in its 'Measuring Up' Annual Consumer report for 2017 that it is working to ensure

- "Passenger assistance - the ability for passengers with a disability to make their journeys easily and confidently, whether those journeys are made on a 'turn up and go' basis or where travel assistance has been booked in advance".³

Measuring Up also goes on to say "Train companies and Network Rail need to comply with an operating licence condition which supports improvements in the accessibility of rail travel.....A number of improvements to policies have been made following our discussions with companies during this process of approval. Our focus is now on ensuring that these written policies are consistently carried out in practice and that passengers receive the services that are outlined by train companies and Network Rail in this area. In line with our commitments to monitor performance and develop a clear evidence base, we continue to:

- Engage with train companies and Network Rail to provide clarity on what is required and to drive improvements where needed."

Whilst no one would disagree with the sentiment of ensuring the agreed policies are carried out, especially where "they drive improvements where needed" the RMT is concerned how this will continue to play out in the future.

Disabled Peoples Protection Policies (DPPP) and changes to them

Recent decisions by the ORR in respect of Train Operating Companies DPPP's do not in our opinion meet the aspirations of that vision and would appear to allow standards to be lessened as opposed to ones which "supports improvements in the accessibility of rail travel".

In the consultation document it states that DPPP's "must be approved by the ORR"⁴. It says the 2009 DfT Guidance "sets minimum standards that train operators have to meet, and which we would expect they will seek to exceed"⁵.

The ORR make clear your intention to review and update the guidance and to move away from a full annual review of DPPP's "when the changes are not material"⁶

³ http://orr.gov.uk/_data/assets/pdf_file/0007/25297/measuring-up-annual-rail-consumer-report-july-2017.pdf

⁴ http://orr.gov.uk/_data/assets/pdf_file/0007/25981/improving-assisted-travel-consultation-november-2017.pdf page 40 5.2

⁵ ibid page 41 5.9

⁶ ibid page 42 5.12

Material changes are described as “Changes would be classed as material where they constitute a substantive change to the policy itself and would impact on the assistance provided to passengers”.

This raises a number of concerns as it is clear that the Guidance is a minimum and whilst you are clear you would not expect licence holders to suggest any changes to their policies “which are not compliant with the requirements of the guidance” where the guidance is silent a change appears to have no material or significant difference.

For example Stagecoach South West Trains DPPP previously agreed on 20/09/16 has in the section headed On the Train a unique section called On Train Staff which states: *For your safety we have guards on all of our trains. Our guards are trained in the use of the on-board wheelchair ramps and station wheelchair ramps and they will provide the assistance on or off the train where there is no station staff available. Our guards provide train service updates and they will move through the train to check tickets and answer enquiries, when they are able to. If you need help in any way, such as getting on and off the train or receiving information, please let the guard know as soon as you can*⁷.

That is a provision in excess of the minimum required in the current guidance but was put in by the company as it reflected their existing policy and they were clearly proud of it. The policy can clearly be seen to have a significant advantage to older, vulnerable and disabled people, especially those who may be wary or nervous about travelling for the first time.

The new First MTR South Western trains DPPP agreed by the ORR on the 9th August 2017 has no section dedicated to on train staff. There is no requirement in the guidance for them to do so. The only sections that are included in the new version mirror the basic minimums in the guidance on how to write a DPPP. One such section Aural and Visual Information does mention that *“We also provide on-train announcements. These are made in sufficient time for passengers, especially those with reduced mobility, to prepare to alight. Where it is necessary to make a manual public announcement, conductors will make every effort to ensure that clear, informative announcements are made”*.

That implies there may be a Conductor on board but the critical factor of the guarantee of a safety trained guard has been removed. It is hard for the RMT to understand how such a change to a DPPP could not be regarded as significant?

There are other sections where staff are mentioned. In Seats and Wheelchair Spaces on Trains it says *“If you are unable to find seating, you should bring this to the attention of our on-train staff, who will help you to find a seat”* and in Walking frames/rollators the only other mention of staff is to explain *“Our staff cannot assist with folding walking frames or rollators, but will help you to store them safely*⁸”

What is of concern to the RMT is that these changes are clearly significant and will bring about a material change in that it is important enough to notice or to have an effect. An effect which appears to be in complete contradiction to the stated desire in Measuring

⁷ http://orr.gov.uk/data/assets/pdf_file/0020/22871/swt-dppp-letter.pdf page 12

⁸ http://orr.gov.uk/data/assets/pdf_file/0006/25386/first-mtr-swt-dppp-approval-letter.pdf page 13

Up to “Engage with train companies and Network Rail to provide clarity on what is required and to drive improvements where needed”⁹.

Both these DPPP’s have been signed off by the ORR but the first one is clearly at a level which means any disabled person can easily travel on a train, safe in the knowledge that a member of staff will be available to help them if necessary. That guarantee of an on board safety trained member of staff is an assurance that their journey will be an experience with little anxiety or stress.

A process that allows the easy removal of such staff sits oddly with the statement made by Keith Richards, Chair of the Disabled Persons Transport Advisory Committee, who recently said: “DPTAC welcomes the launch of this accessibility action plan consultation. It supports our vision that disabled people must have the same access to transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and without extra cost”.¹⁰

It is clear to the RMT that the removal of safety trained staff from trains cannot assist the passengers or the ORR, who open this consultation by stating “Our vision is to empower confident use of the railway by all”¹¹.

The real agenda

The Government and the ORR have both pursued the strategy that has created the disadvantage now being imposed on disabled people and their right to travel.

In 2011 the DfT and Transport for Scotland proudly stated:

“There are over 10 million people in Great Britain with a disability. The Government is committed to transport for all; and improving the accessibility of railway stations and passenger trains will encourage more disabled people to use the railway network – and to do so more regularly”¹²

The link between accessibility on railway stations and passenger trains was clearly recognised.

However at the same time the DfT and the Office of Rail Regulation (as ORR was then known) commissioned a report by Roy McNulty which said “The study recommends that the default position for all services on the GB rail network should be Driver Only Operation (DOO), with a second member of traincrew only being provided where there is a commercial, technical or other imperative”.

⁹ http://orr.gov.uk/_data/assets/pdf_file/0007/25297/measuring-up-annual-rail-consumer-report-july-2017.pdf page 13

¹⁰ <https://www.gov.uk/government/news/action-plan-to-improve-accessibility-in-transport-unveiled-by-the-government> 24th August 2017

¹¹ http://orr.gov.uk/_data/assets/pdf_file/0007/25981/improving-assisted-travel-consultation-november-2017.pdf page 4 point 1

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3191/accessible-train-station-design-cop.pdf

It would appear the needs of the disabled are not a commercial, technical or other imperative.

The link between stations and trains that ensured disabled people would not be discriminated against was broken in 2015 when a new Code of Practice 'Design Standards for Accessible Railway Stations' was issued with the 2011 version (quoted above) withdrawn.

The new Code of Practice completely removes any reference to passenger trains: "There are over 10 million people in Great Britain with a disability and we are committed to improving their access to work and leisure. This includes improving access to the UK's railway stations, and this publication will help those delivering station infrastructure improvements to contribute to that aim"¹³.

Turn Up and Go?

Even after the removal of the reference to improving accessibility on trains, RMT is unclear why the ORR currently accept they are powerless to ensure passengers with a disability are not discriminated against and able to make their journeys easily and confidently, whether those journeys are made on a 'turn up and go' basis or where travel assistance has been booked in advance. Even the ORR themselves recognise within their role that "*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)*"¹⁴.

Having safety and disability aware trained staff on-board would mean that unstaffed stations can still be used by disabled people. Whilst the RMT believe all stations should be staffed, with 90% of stations currently unstaffed at some times during the day, or not at all, how can anyone believe disabled passengers will just decide to 'turn up and go'? The only way to ensure this becoming a possibility in the future is to guarantee a member of trained staff on every station and every train. Given it is unlikely every station will get trained staff it is the trained on board staff who are an essential safety net to ensure a disabled person can board or alight at an unstaffed station. Only the constant presence of a guard/Conductor on the train can ensure disabled people are not discriminated against in their desire to travel like everyone else.

RMT would like to see the importance of staffing levels acknowledged in binding national agreements negotiated with unions and the industry. Without such protection, the discussion of improving accessibility for older, vulnerable or disabled people is without foundation.

Maintaining and increasing staffing levels where appropriate is the essential part of securing and improving accessibility. Trade union representatives should also have a protected role in advising the minimum level of staffing required to ensure that transport is genuinely fully accessible.

¹³ <file:///R:/Disabled%20Issues/design-standards-accessible-stations.pdf> page 9

¹⁴ http://orr.gov.uk/data/assets/pdf_file/0007/25981/improving-assisted-travel-consultation-november-2017.pdf page 7

To book or not to book?

RMT is unclear what the implications of the statement made in 'Measuring Up' in relation to unbooked assists means, especially in relation to this consultation and would seek further clarification:

"We have now reached an agreement with RDG and its members that they will provide us with data on unbooked assists. This will include RDG collating data from a central webform which train companies and Network Rail will be able to update for their respective stations. In the longer-term, the solution we have agreed with industry to address the compliance reporting gap is for it to be met by the new Rail Accessibility Reservation System, which is due to replace the current Passenger Assist system in September 2018. The new system should record both booked and unbooked assistance requests, assistance completions, and will automatically request passenger feedback on the quality of the assistance they received."

Whilst the collection of such data may be useful, RMT would want more details on what thresholds are being used with it? The first question in the 'Improving Assisted Travel Consultation' is "how can rail operators improve the availability and promotion of Assisted Travel in stations".

That seems to imply the option for promoting unbooked assistance is not on the current agenda and the intention here is to show numbers decreasing as passengers are further pushed towards booking assistance.

RMT believes this is because the option for turn up and go will become less and less with time.

In relation to the role of a DPPP, instead of hiding the fact that staff are being removed from stations and trains with minimalist DPPP's obliquely referencing on-board staff, DPPP's should be explicit about staff absence, especially in the case of safety trained Guards/Conductors which many passengers still assume will be on-board.

For those companies committed to ensuring there are staff on board then simple, clear posters at stations and on trains stressing the fact that all trains have a guaranteed safety trained member of staff on board will be sufficient to give passengers the confidence to travel. That was what South West trains did successfully under the previous franchise operator with prominent posters proclaiming the Guard as a 'hero' and the fact that one would always be on the train. Such an approach, along with the times at which staff are available at stations would transform the confidence of all older, disabled and vulnerable passengers to use the railway.

The ORR 'Disabled Peoples Protection Policies – a Regulatory Statement July 2014', clearly says the ORR policy objective is to *"Empower confident use of the railway by disabled passengers and promote awareness of the advice and help available"*.

That fits with the ORR's duty under the 'public sector equality duty' in The Equality Act (S.149) which includes the obligation to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

RMT therefore believes that simple and clear announcements made regularly at stations, the use of posters and through the use of social media/websites would do more than just a printed pamphlet, which is usually hidden away on a bad display, somewhere in a station.

Pamphlets should still be available for reference and there is no reason why they cannot be in plain English, but a simple advertising campaign stating that there will always be safety qualified assistance on the train would be many times more powerful.

Staff Training

You state that a report commissioned by the Association of Train Operators (now the Rail Delivery Group) in 2015 and published in July this year made a number of helpful findings and recommendations around staff training¹⁵. RMT would not disagree that the report does make a number of excellent recommendations.

It may have been published in July last year but that was only reluctantly after it was leaked to the press. The report was presented to the RDG in May 2015 but effectively buried.

ORR selectively quotes from the report only some of the comments about staff and training. For example you fail to mention that in recommendation 11 on page 57 it states: "There should always be on-board staff available to assist passengers at unstaffed stations. These staff should have appropriate training in Rules and professional competence in this area. Urgent consideration should be given to how current policies on staffing levels can be modified to ensure that greater progress towards accessibility is maintained".

Surely that recommendation is just as important as recommendation 14 on training which is quoted in full.

Notwithstanding there are 21 important recommendations the most salient point you raise in the current consultation is at 3.12 which says "it is not clear at this stage how RDG plan to take forward the recommendations they have put forward". It would be extremely useful if the ORR could ask the RDG to provide clarity as to how all of the recommendations will be addressed.

The authors of the report make it clear in recommendation 15 that "The ORR should continue to take a proactive role in ensuring that the DPPP is of real value to disabled and older passengers. The ORR open letter to TOCs dated 18th December 2014 is a welcome step in this direction"¹⁶

The RMT agrees that the letter was a real opportunity to improve the service across the board, especially with your request to the TOCs:

"For example, we will want to understand:

- The arrangements in place (and the robustness of these) for:

¹⁵ <https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981>

¹⁶ http://orr.gov.uk/_data/assets/pdf_file/0006/16377/dppp-compliance-and-approval-process.pdf

- delivering assistance, promoting awareness of the assistance available and facilitating travel by those with disabilities (including those with less visible disabilities);
- monitoring and evaluating performance in respect of the above (for which we will want to understand the operator's own benchmarks for what it considers to be successful performance), and the processes in place for acting on this to drive continuous improvement;
- capturing and responding to feedback from customers and making improvements as a result of this;
- how the organisation is structured to deliver these arrangements; and
- The extent to which the operator has the right organisational values and behaviours towards disability. This includes the extent to which its senior management team is engaged with and provides leadership and support to the frontline staff that deliver assistance, and ensures that the right processes and systems are in place”.

We have seen nothing since that letter to believe any of this is happening and nothing to identify whether this question raised by the authors of the report ‘On Track for 2020’ has been answered by the RDG?

“It is difficult too, in legal terms, to see how trains with no staff to provide assistance running through unstaffed stations cannot come under the heading of a “provision, criterion or practice” that discriminates. (Section 20 of the Equality Act 201029)”

Driver Controlled Operation

The authors of ‘On Track for 2020’ also raise another serious point about the implications of the rush towards more Driver Only Operation. “There is however an indication that there will be an increase in initiatives to reduce staffing (Driver Only Operation (DOO)) which does have significant accessibility implications¹⁷”

That echoes the comments also made in March 2015 from the now suppressed Rail Safety Standards Board (RSSB) report ‘Evaluating technological solutions to support driver only operation train dispatch’¹⁸

Funded by the Train Companies the RSSB produced the report in 2015 but it was subsequently removed when a number of controversial aspects of DOO came to light.

One such section entitled “Assisted access to travel” said that:

“Assistance for disabled access to trains is typically provided by platform staff, or by the guard at unstaffed stations. With DOO(P) in operation, assisted access requires a member of platform staff to be available to help the passenger. TOCs interviewed revealed that they generally prefer passengers requiring assistance to book in advance, although one operator stated that if a passenger does book in advance, if no staff are present the passenger may be forced to travel to an alternative station and arrange onward travel from there.

Another operator stated that drivers may provide assistance, but that this was not universal and was essentially at the driver's discretion. Under DOO(P) passengers

¹⁷ Ibid Page 30

¹⁸ Hard copy available from the RMT

would face greater requirements to book in advance, possibly facing additional travel restrictions, which would represent a move away from the current goal of making the railway more accessible for all. If DOO(P) is to be employed across the network it would be preferable to have systems in place to ensure that passengers requiring assistance are not excluded. Such measures would need to be determined in discussions with TOCs prior to implementation of DOO(P) and should be standardised across the railway Network.”

Additionally, a Parliamentary motion tabled by MPs has warned that:

“...train guards currently provide a safety critical role, which gives a guarantee of a second person on a train to provide assistance to passengers who require it...proposal to remove a second safety critical member of staff on Southern Rail services would be detrimental to access especially at unstaffed stations; calls on the Government and Southern Rail to ensure passengers retain this guarantee at all times; and further calls on the Government to undertake an equality impact assessment of DOO, if it has not yet done so, and to publish this and any other relevant work it has carried out.”¹⁹

The ‘On Track for 2020’ report also expands on this subject “It is clearly not possible to obtain unbooked assisted travel to or from an unstaffed station unless there is some member of staff there to assist with the boarding or alighting. Critically, it is Conductors who are in the front line in providing assisted boarding and alighting, including deploying platform-train ramps where appropriate, at the majority of platforms which are not staffed. It is Conductors who are best placed to ensure that assistance is delivered effectively and in accordance with the law. A key risk area is availability of help in getting off the train. During disruption and in the event of an emergency, Conductors can also deliver the railway’s duty of care to assisted passengers and other older and disabled people”

Although the ORR has stated in April 2017 that “Where driver controlled operation is planned to be used, the implementation should be planned”²⁰ this has not been the case or satisfactory in the opinion of RMT members affected in a number of companies to date. It is clear that the RDG has not taken consideration of any of the concerns referred to in reports it has paid for above.

The RMT would also welcome clarification as to what this statement from Measuring Up below means, given the ORR’s previous statements claiming that DOO is safe? “In addition to this we are working to understand more around the systems and process being employed in relation to Driver Controlled Operation services and will be returning to this in the autumn, once we have finalised and published the results of our research, detailed above”²¹.

The Transport Select Committee ‘Improving the Rail Passenger Experience’ said in October 2016. “We are concerned that no official impact assessment has been made of

¹⁹ <https://www.parliament.uk/edm/2016-17/514>

²⁰ http://orr.gov.uk/data/assets/pdf_file/0004/24574/Railway-safety-principles-and-guidance-on-driver-controlled-operation.pdf section 5

²¹ http://orr.gov.uk/data/assets/pdf_file/0007/25297/measuring-up-annual-rail-consumer-report-july-2017.pdf page 35

the potential effects of DOO on disabled people's access to the railway.²² and yet GTR Southern unilaterally served notice of the introduction of a massive increase in DOO in December 2015.

It was also only in 2017 April that ORR established a principle that where:
"Driver controlled operation is planned to be used, the implementation should be planned"

It goes on to say "Before a driver controlled operation is introduced or changed at a location, there are a number of factors that need to be taken into consideration to ensure that the method of operation being considered is suitable and that any safety issues have been identified and suitable controls put in place. It is important to ensure that once it has been decided to implement any new or extended scheme, a robust process is agreed by all affected parties and put into place to ensure successful implementation"²³.

RMT is extremely concerned that older, vulnerable and disabled people are not seen as an 'affected' party and have not been consulted or the risks assessed in relation to their ability to travel safely, as a result of these changes.

Changes which at the end of the day, as the suppressed RSSB report so eloquently expressed, mean:

"By far the biggest financial benefits arise from a reduction in staff salaries. This can arise from employing fewer staff, and from replacing guards with cheaper non-safety critical on-train staff (NSCOS).²⁴

RMT and four other signatories (Age Concern EU, Disability Rights UK, National Pensioners Convention and Disabled People Against Cuts) have made their concerns known to the ORR in respect of DOO in a letter from Thompsons solicitors and it is hoped that the issues identified in that letter and this consultation are fully explored by the ORR.

Conclusion

RMT believe safety, accessibility and security are more important than cheaper non-safety critical on-train staff which mean bigger profits for private companies.

Thankfully the Scottish and Welsh governments also agree with these sentiments.

The Welsh Government recently recognised the concerns of disabled passengers when on 29th September 2017 the First Minister said in a press release regarding the next Wales and Borders Franchise to begin in October 2018 that,

"The Welsh Government wishes to improve safety, security, service and also accessibility for passengers who require assistance. The Welsh Government therefore

²² <https://www.parliament.uk/business/committees/committees-a-z/commons-select/transport-committee/inquiries/parliament-2015/improving-the-rail-passenger-experience/>

²³ http://orr.gov.uk/data/assets/pdf_file/0004/24574/Railway-safety-principles-and-guidance-on-driver-controlled-operation.pdf page 7

²⁴ 7.2 page 50 Copy available on request from the RMT

commit to keep a safety critical conductor (guard) on all of the Wales & Borders trains and services including heavy rail Metro services and the trains will require this second person to operate. This commitment builds on a clear public response in our consultations, where over 90% of respondents said that a second member of staff was either quite important or essential in the Wales and Borders region, something Age Cymru said was 'essential'. Disability Wales estimates that disabled people make up more than 20% of the population in Wales."

It is only Chris Grayling and the Department of Transport who appear to disagree and refuse to allow train operating companies to negotiate deals that ensure the "right to a standard of living in line with equality and human rights law, as well as access to transport for disabled people". Those are the words of the Equality and Human Rights Commission in its Business plan for this year.

The EHRC are clear that the question for an organisation is "whether:

- the way it does things
- any physical feature of its premises, or
- the absence of an auxiliary aid or service

puts disabled people at a substantial disadvantage compared with people who are not disabled²⁵."

RMT believes the ORR has a clear duty to ensure that all equality issues relating to the expansion of DOO services and by default, changes to Assisted Travel arrangements, are fully explored. Failure to act on the part of the ORR may also bring you in breach of your own Public Sector Duty under the Equality Act.

The Disability Discrimination Act, the predecessor to the Equality Act 2010, has an overarching policy and purpose "to place the disabled person as far as reasonably practical in a similar position to the ambulant user" of the relevant service or more simply put to provide a service "as close as it is reasonably possible to get to the standard normally offered to the public at large"²⁶

RMT believes the specific obligations in the Equality Act in relation to discrimination against disabled people must be understood and acted upon with this objective in mind.

²⁵ <https://www.equalityhumanrights.com/en/multipage-guide/are-disabled-people-substantial-disadvantage>

²⁶ https://www.bindmans.com/uploads/files/documents/E7_Judgement.pdf para 59

RNIB Response to Office of Rail and Road 'Improving Assisted Travel' Consultation

About us

RNIB are the largest organisation of blind and partially sighted people in the UK and welcomes this opportunity to respond to the consultation.

With blind and partially sighted people at the heart of everything we do, our community of over 33,000 people brings together anyone affected by sight loss. More than three quarters of our Board of Trustees are blind or partially sighted. We support, empower and involve thousands of people affected by sight loss to improve lives and challenge inequalities. We engage with a wide range of politicians, organisations and professionals to achieve full inclusion through improvements to services, incomes, rights and opportunities.

We campaign for the rights of blind and partially sighted people in each of the UK's countries. Our priorities are to:

1. Be there for people losing their sight.
2. Support independent living for blind and partially sighted people.
3. Create a society that is inclusive of blind and partially sighted people's interests and needs.
4. Stop people losing their sight unnecessarily.

We are pleased to be able to respond to this consultation. Effective Assisted Travel is absolutely vital for our community to be able to get out and about using the rail system and live independent lives. In a survey representative of people registered as blind and partially across the UK, one quarter were not able to travel by train as much as they would like (rnib.org.uk/myvoice). Assistance is a requirement of the Equality Act, and rail operators who fail to provide assistance and related accessible services risk a claim under the act.

What we would like to see is:

- Accessible booking systems for passenger assistance;
- A shift towards “turn up and go” assistance;
- Emergency phone numbers for people when assistance doesn’t arrive;
- End to end arrangements for journey assistance across rail companies;
- Station assistance staff who provide impairment sensitive support.

To achieve this:

- ORR should ensure that booking Assisted Travel is easy and fully accessible to blind and partially sighted people in whatever format they use to access.
- Communication between rail companies should be improved to ensure that users of the scheme receive a high quality end to end service, as too often blind and partially sighted people experience problems where their journey involves communication between companies.
- ORR needs to ensure that consistent, regular, high quality disability awareness training for all staff is in place across all rail companies. Blind and partially people tell us that they have experienced some excellent practice but also some appalling service.

We answer individual, or groups of, questions posed in the consultation here in turn. We would be willing to discuss our response in more detail.

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

Standard print leaflets in stations may reach friends and family of people with sight loss, but need to be in accessible formats to be readable by blind and partially sighted people. Large font, clear print posters might work for some. Promoting the scheme through audio announcements could reach others. Station or train staff must be equipped to readily share information about the scheme with blind and partially sighted passengers.

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

We welcome application of the Crystal Mark standard but documents must also be made accessible to blind and partially sighted people. Large print, audio, braille and electronic formats should be available.

Q3. What steps can be taken to increase website accessibility?

RNIB receives regular complaints about the accessibility of rail operator and ticket buying websites. Websites must be designed with blind and partially customers in mind from the outset, for example giving alt text descriptors for images, enabling the reader to resize text and alter contrast (<https://help.rnib.org.uk/help/daily-living/technology/accessible-website> gives guidance). Websites must be compatible with screen readers. Tools such as 'Speak me' will help some individuals.

Some blind and partially sighted people find apps on smart phones an effective way to access services, so accessibility must be extended to these.

We recommend ORR undertake an audit of train operating company websites, and apps, and penalise those which are not accessible.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We encourage use of social media as one way to look to increase awareness, particularly among younger people. However, the fact that sight loss is more common among older people who are less likely to use social media will mean that it is not a way to reach everyone.

Q5. Are there any obstacles to providing Assisted Travel information no more than ‘one-click’ from rail operators’ website home pages?

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

Linking ticket buying, whether online, by phone or in person, with the option to book Assisted Travel is welcome, but should not be the only opportunity. Booking Assisted Travel also needs to be easily accessible from home pages of operators’ websites. Consultation with blind and partially people tells us that they want easier ways to book, for example being able to book assistance the evening before a journey at midday the following day. The existing phone line often has very long waiting times, resulting in people giving up. Booking a seat with space for a guide dog, is much harder than booking space for a bicycle.

Q7. How can rail operators’ improve the availability and promotion of Assisted Travel information to third-party agencies?

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

Local and national sight loss organisations can promote Assisted Travel to their members, for instance the scheme is regularly advertised on RNIB’s Connect Radio. Information could be included in materials given to people if their sight loss decreases to the point of being certified and/or registered as blind and partially sighted, for example sight loss advisors in eye clinics could include it as information about how to maintain independence.

A user forum could enable people with a range of disabilities to inform improvements.

Q9. How might the reliability of communications be improved?

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can

RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Passenger Assist, when it works, does support blind and partially sighted passengers to travel and many rely on assistance and find that largely the service is good. But many don't want to take the risk of assistance not turning up and so rely on friends or family to travel with them, which means their independence and spontaneity is severely restricted. Uncertainty over whether assistance is going to be good or bad adds to the anxiety of travelling for many people.

In our survey of 600 people with sight loss, a third said that booked assistance not turning up was a difficulty they faced when travelling by train. One survey respondent reported:

“I've been left on the platform five times in the last six months at Birmingham New Street because assistance hasn't turned up.”

In recent consultation workshops, blind and partially sighted people told us assistance often breaks down at points of interchange between one rail company and another. We heard examples of people being distressingly left on trains and missing connections due to the fact that although one operator had provided assistance at the start of the journey, a different operator at an interchange station had not provided their portion of the assistance.

Our workshop participants noted that it is often difficult to locate the assistance point within busy stations; they are often poorly sign posted. This challenge is escalated in stations under renovation. The suggestion is that blind and partially sighted people could be issued with a number they could call or text to indicate they had arrived at the station, and so be met by a member of staff rather than struggling to navigate around a station.

Please also note that RNIB's legal services have recently dealt with a number of cases involving the failure/inadequacy of passenger assistance. In one case the failure to provide appropriate assistance led to a guide dog user falling between the train and the platform. In another case, passenger assistance failed to turn up and the passenger was locked inside a train at a station and then returned to her original destination. An emergency phone number should be available for when assistance doesn't arrive.

Improved communications between, and within, rail companies needs to be a priority for urgent action: a cross-industry protocol could make a strong contribution to this.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

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

A commitment to refund the cost of the journey is welcome; however, the priority should be to make the much needed improvements to the scheme to enable people to be confident they will receive the service they are relying on. In turn, many book assistance because they cannot rely on what's in place in stations e.g. poor platform announcements, poor signage, lack of tactile strips on platforms; with improvements some individuals would not require assistance. As one individual reported:

“At one station I always have to book assistance because their platform audio announcements come so late I don't have a chance to get to the platform in time. If the announcements were made earlier or there was a more accessible way for me to get that information accurately I wouldn't need assistance.”

A system for making complaints and claiming refunds must be fully accessible, and should be audited for accessibility. The redress policy needs to be clearly advertised to reach all scheme users. Rail operators who fail to provide assistance risk a claim under the Equality Act.

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

Q14. How frequently should disabilities training take place and its content be refreshed?

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

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Staff training should be mandatory for new staff and staff changing role, and refreshed at least annually. In RNIB's recent survey of over 600 blind and partially sighted people, one in five said that staff not being helpful was a difficulty they faced when travelling by rail. It was universally felt, in both our survey and consultation groups, that railway staff need better training especially around guiding, and assisting people with a visual impairment in general. Some of the poor experiences discussed included:

- A member of staff shouting "blind person coming through!" to a packed train platform.
- A member of staff guiding a person by grabbing hold of the bottom of their white cane and leading them about by it.
- Staff wandering off and not explaining why they are leaving.

Many said that not knowing whether staff would be helpful caused them stress and anxiety when travelling.

We concur that rail staff need to receive regular disability-awareness training, including visual awareness and guiding training. This training needs to be for all, but more detailed for those in front line roles. It also needs to be independently verified. A plan to support and penalise companies who are not meeting the requirement needs to be in place. Likewise opportunities to celebrate and disseminate good practice should be embraced.

Blind and partially sighted people tell us that the quality of assistance differs from the really good to the appalling. Consistency in training for company staff could be achieved by engaging the same providers or

mandating use of a particular framework. We need people with disabilities to continue to be involved in delivering this training. Training needs to include understanding the support needs of those with hidden, and multiple, disabilities.

In addition to training, ORR need to ensure that there are sufficient assistance staff available at stations, including in ticket offices and onboard trains. More stations should offer 'turn-up-and-go', with adequate staffing in place to support this. In addition, staff must be more visible at train stations and onboard trains. Where a policy of 'driver only operation' trains is implemented there is a need to address how assistance can be offered, and the safety of passengers assured, on board and at unmanned stations.

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

We welcome the development of RARS, including it's potential to reduce the necessary booking notice period.

In relation to monitoring we would encourage ORR to continue with mystery shopping and research capturing the experience of scheme users. We encourage ORR to look at current practice by the Civil Aviation Authority who has done extensive work on passenger assistance in airports to see whether lessons can be learnt around monitoring and holding providers to account.

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

The approach to updating the guidance sounds appropriate. We would encourage ORR to require that rail operators increase flexibility for passengers using the Assisted Travel Scheme, shortening the notice period. We would remind ORR that the Equality Act applies here.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

The shift from annual review of DPPPs to review when material change has been made will be acceptable as long as there is a robust system in place to alert ORR to changes in services provided.

ORR should ensure that DPPPs are accessible to blind and partially sighted people.

For further information or to discuss our response further, please contact:

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Improving assisted travel consultation

Scope response

January 2018

Summary

Assisted travel is vital to many disabled people using the rail network. However, it is still not performing at the levels needed to ensure that all disabled people can use the rail network as they would like.

In addition to the proposals laid out in the consultation, we have proposed some actions that could be taken to improve the assisted travel system.

Recommendations

Raising passenger awareness

- The ORR work with train operating companies to promote Passenger Assist across a range of platforms, targeting disabled people who do not currently use the rail network
- Train operating companies (TOCs) establish systems that prompt customers to book assistance, if needed, at the point of sale of tickets. At present, this should consist of signposting towards the existing RDG portal

User experience

- The ORR and RDG work with disabled people to co-produce a standardised process for complaints around assisted travel, and this be adopted by all TOCs

Staff training

- DPTAC work with ORR to update their training framework
- All TOCs update their DPPP to ensure their staff training adheres to the DPTAC training framework
- DPTAC be given the role of verifying the quality of disability awareness training, and be able to direct ORR to require improvements from providers found to not be meeting the required standards

Disabled people's protection policies

- Where significant changes are being made to a DPPP, the TOC in question be required to demonstrate broad engagement with disabled people

Enforcement of standards

- The ORR 'Health and safety compliance and enforcement policy statement' be updated to ensure that all potential breaches of RVAR be investigated, and that where a breach is found it will result in an improvement notice or material sanction

Spontaneous travel

- The ORR work with the RDG and TOCs to promote the existing 'turn up and go' schemes, and any expansions of these schemes

About Scope

Our mission is to drive social change so that disabled people have the same opportunities as everyone else. We want to achieve Everyday equality and support disabled people to get the best start in life, live the life they choose and be financially secure.

We do this by running a range of services, raising awareness of the issues that disabled people face and influencing change across society. We provide support, advice and information for more than a quarter of a million disabled people and their family members every year.

Introduction

The ability to travel freely is crucial to living an independent life for all people. However, previous research has shown that up to 75 percent of disabled people face barriers to using transport.¹ This means that disabled people make noticeably fewer journeys than non-disabled people.

On the rail network, assisted travel is crucial to ensuring that many disabled people are able to travel at all. However, we know that the current system is far from perfect. Anecdotally, only around half of disabled passengers requiring assistance book it in advance, with the other half simply turning up and relying on station staff.² One in five people who do book support through the Passenger Assist service do not then receive help alighting from their train.³

This consultation from the Office of Rail and Road (ORR) on improving the assisted travel system is welcome. We are supportive of the ambitions outlined, but there are areas where we feel the plan could go further. We have ordered our observations along the same lines as the consultation document, with two additional sections we feel should be addressed:

1. Raising passenger awareness
2. User experience
3. Staff training
4. Monitoring
5. Disabled people's protection policies (DPPPs)
6. Enforcement of standards
7. Spontaneous travel

In writing this submission we have consulted with a diverse group of disabled people, covering a range of impairments, regions and transport use patterns. Anonymous quotes from these individuals are included.

¹ Office for Disability Issues (2011) Life Opportunities Survey Wave one results https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/180891/los_wave_one_200911.pdf

² Rail Delivery Group (2015a) On track for 2020? <https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981>

³ Ibid

Section 1: Raising passenger awareness

1.0.1 It is concerning that only one in four disabled people are aware of Passenger Assist.⁴ This suggests that a large number of disabled people who could use the rail network are not currently doing so.

1.1 Assisted travel information - Question 1

1.1.1 Given the low levels of awareness of Passenger Assist, more work needs to be done to alert disabled people to the schemes existence. We agree with the proposals in the consultation to encourage a wider range of promotional materials for the scheme to be available in stations, ensuring all travellers are aware of its existence.

1.1.2 However, for disabled people who are not aware of Passenger Assist, this may prove to be too late. Material in train stations would, by its nature, only been seen by those people who are already using the rail network. With 75% of those who already use trains on a regular basis being aware of Passenger Assist,⁵ increasing the visibility of the scheme in stations may not be the most effective way of closing the awareness gap.

1.1.3 Instead, improved information in stations should form part of a broader programme of awareness raising. A multi-platform approach, specifically targeting disabled people who currently do not use the rail network at the moment, is likely to significantly improve knowledge of Passenger Assist.

Recommendation: The ORR work with train operating companies to promote Passenger Assist across a range of platforms, targeting disabled people who do not currently use the rail network.

1.1.4 Social media and online advertising will rightly play a major role in any future promotion of Passenger Assist. However, disabled people have notably lower levels of use of many digital technologies than non-disabled people.⁶ As such, we would suggest that information about the scheme is integrated with existing physical advertising campaigns carried out by train operating companies.

1.2 Passenger facing documents - Question 2

1.2.1 We are supportive of the principle that documents for public consumption should be as accessible as possible. To this end, the ambition of all passenger facing documents being written in plain English is a welcome one.

1.2.2 We believe that train operating companies (TOCs) should dedicate resources towards developing documents that meet the Crystal Mark guidelines – including those covering areas other than accessibility. This should include

⁴ Office for Rail and Road (2017a) Research into passenger awareness of assisted travel services. http://orr.gov.uk/__data/assets/pdf_file/0008/25982/research-into-passenger-awareness-of-assisted-travel-services-april-2017.pdf

⁵ Office of Rail and Road (2017a) Op. Cit.

⁶ Ofcom (2017) Access and Inclusion in 2016.

https://www.ofcom.org.uk/__data/assets/pdf_file/0030/98508/access-inclusion-report-2016.pdf

both quality assurance of documents, and ensuring that all staff involved in writing public facing documents are trained to writer to the Crystal Mark standard.

- 1.2.3 The current guidance for writing disabled people's protection policies (DPPPs) requires TOCs to produce alternative formats of the policies within 7 days of a request. This means that some customers will be unable to access information at the point they need it. We do not believe that it would be reasonable to require TOCs to produce literature in every conceivable format without any passengers requesting it. However, some accessible formats, such as easy-read and screen reader friendly digital files, are sufficiently widely used that TOCs should have copies of their accessibility documents available in these formats without a time delay.

1.3 Ticket buying process - Question 6

- 1.3.1 The current process entails disabled people navigating several different systems in the process of buying a ticket and booking assistance. With knowledge of assisted travel low, this presents an excessive barrier to disabled people accessing assistance.
- 1.3.2 At the moment, buying train tickets involves going through the purchasing platform of a given TOC. Given that TOCs also manage stations in their franchise area in most cases, this means they are also responsible for providing assistance. It is thus in the interests of the TOCs to promote the current system for booking assistance to all individuals booking tickets on their services.
- 1.3.3 With the Rail Availability Reservation Service (RARS) in development, we feel this would currently be best served by improved signposting. On the point of sale of a ticket, TOCs should be required to ask customers if they will require assistance and, if so, signpost towards the portal for booking this. As well as significantly simplifying the process of booking assistance, this would serve to increase awareness of Passenger Assist.

Recommendation: Train operating companies establish systems that prompt customers to book assistance, if needed, at the point of sale of tickets. At present, this should consist of signposting towards the existing Rail Delivery Group (RDG) portal.

- 1.3.4 We would also caution against a digital only system being developed. Awareness of Passenger Assist currently decreases with age⁷, and older disabled people are notably less likely to use digital technology than other demographics.⁸ As such, the development of such a system should also ensure that those booking trains in person or over the phone are likewise prompted to book assistance.

Section 2: User experience

⁷ Office of Rail and Road (2017a) Op. Cit.

⁸ Ofcom (2017) Op. Cit.

2.0.1 As has been noted, the experiences of Passenger Assist users are not as positive as the should be. One in five people who do book support through the Passenger Assist service do not then receive help alighting from their train⁹, an unacceptably high rate for such a system.

[The assisted travel system could be improved by] better communication between all involved.

2.1 Cross-industry protocol - Question 10

2.1.1 The difficulties faced by users of Passenger Assist are not simply a case of information not always being transmitted efficiently. There are a variety of issues, ranging from staff training to the upkeep of accessibility equipment. All of these need to be addressed in order to ensure that assisted travel works for disabled passengers.

2.1.2 That notwithstanding, it is clear that communication around assisted travel could be improved. This is particularly evident when looking at the difference in assist completion rates between departure and arrival stations.¹⁰ This is particularly an issue for those passengers attempting to travel via 'turn up and go', rather than by booking assistance in advance.

An online customer account [should be created] where disabled users could detail their issues and needs.

2.1.3 A cross-industry protocol would be a major undertaking, and would potentially be made redundant by the introduction of RARS in late 2018. However, the ORR should produce enforceable guidelines on the process by which stations communicate with one another regarding passengers in need of assistance.

2.1.4 In order to ensure that RARS is an effective product, it is vital that it is shaped around the experiences of disabled people. The RDG should work with the Disabled Persons Transport Advisory Committee (DPTAC), the ORR and disabled passengers to gather their views and co-produce the new RARS system.

2.2 Refunds for disabled passengers - Question 11

2.2.1 As with all consumers, it is important that disabled people have the opportunity to seek redress if a service is not provided. By failing to provide assistance as booked, operators are effectively denying service to disabled passengers. As well as a failure of the contract between the operator and the passenger, such events are also a potential breach of the Equality Act 2010. With 12% of passengers who book assistance then not receiving it,¹¹ this is an issue that needs to be addressed.

⁹ Rail Delivery Group (2015a) Op. Cit.

¹⁰ Office of Rail and Road (2017b) A mystery shop of turn-up-and-go services.
http://orr.gov.uk/_data/assets/pdf_file/0006/25980/a-mystery-shop-of-turn-up-and-go-services-report-november-2017.pdf

¹¹ Office of Rail and Road (2017c) Research into passenger experiences of Passenger Assist
http://orr.gov.uk/_data/assets/pdf_file/0009/25983/research-into-passenger-experiences-of-passenger-assist-november-2017.pdf

- 2.2.2 It should be routine that, where assistance is booked but not provided in full, the fare for that journey be refunded to the passenger. The ORR should work with the RDG to develop a straightforward process by which this can be achieved. Such a form of redress should not be considered as an alternative to any obligation on the TOC to provide alternative transport for a disabled person where the support booked is not available.
- 2.2.3 The process to recoup money in such an event should be communicated to disabled passengers at the point they book assistance, rather than relying on complaints being made after the event.

2.3 Independent redress policies - Question 12

- 2.3.1 Establishing a form of redress for disabled passengers is crucial to ensuring they have confidence in their rights as consumers. However, if all TOCs develop their own policies, then there is a danger that not only the forms of redress available but also the methods for claiming this will diverge.
- 2.3.2 To avoid a situation in which disabled consumers are unclear on their rights due to variation between TOCs, we recommend that the ORR and RDG take a lead in creating a standardised process by which redress can be sought. This should then be adopted by all TOCs as a condition of their franchise.
- 2.3.3 This is particularly important where train journeys may involve different stages provided by different TOCs, or Network Rail. In these situations, a unified redress policy would avoid disputes arising over which jurisdiction a given incident occurred under. It would also help reduce uncertainty caused when a consumer purchases a ticket through one TOC's platform, but the service is provided in its entirety by a different TOC.
- 2.3.4 We know from other areas that some disabled people have difficulties accessing traditional complaints procedures. This may be due to explicit accessibility concerns, such as poor web design, but also due to uncertainty navigating the complaints system. To rectify this, any standardised complaints process should be co-produced by disabled people, and meet the same accessibility benchmarks as DPPP's.

Recommendation: The ORR and RDG work with disabled people to co-produce a standardised process for complaints around assisted travel, and this be adopted by all TOCs.

Section 3: Staff training

- 3.0.1 We know from the experiences of disabled people that the attitudes and behaviour of staff can make a major difference to their experiences of public transport. For example, the recent Supreme Court judgement in *FirstGroup vs Paulley* highlighted the limited level of support given by some transport staff in assisting disabled passengers, albeit in relation to buses rather than trains.

[There] always seems to be a huge debate between station and train staff about which ramp to use.

- 3.0.2 With new developments such as the Supreme Court case mentioned above, it is important that transport staff are kept aware of any changes to their responsibilities. While training in the duties contained in the Equality Act 2010 is positive, both legal requirements and best practice now go further than this. As such, training should not be limited to the Equality Act.
- 3.0.3 It has been particularly noted that some members of staff do not appear to be aware of the full range of 'invisible' disabilities that exist. While it cannot be expected that every member of staff is fully aware of every possible form of disability – and how to engage with a disabled person with each condition – understanding of a wider range of conditions and impairments would be desirable.
- 3.0.4 For training to have a meaningful impact on staff knowledge and behaviour, it is of course necessary for it to meet certain standards. Failure to monitor and ensure that training remains at a high standard would undermine its intention.
- 3.0.5 It is our belief that, in this area, disabled people are best placed to assess whether training is likely to result in staff understanding their needs. The co-production of disability awareness training is a widespread standard, and this area should be no different.

Everything's geared for wheelchair users and I'm not a wheelchair user.

3.1 Consistent disability awareness training - Questions 13 & 15

- 3.1.1 It is important that disabled people have confidence they will receive the same levels of service regardless of where they are travelling, in the same way as has become expected by non-disabled passengers. To ensure this, harmonisation of training across different TOCs is needed.
- 3.1.2 The DPTAC training framework has been produced by disabled people, and is specific to this area. In order to ensure consistency in training across different TOCs and areas of operation, it is important that all organisations involved are required to adhere to the same standards.
- 3.1.3 It is our view that, by making this a mandatory element of the DPPP guidance, sufficient uniformity of training can be ensured.
- 3.1.4 However, given that the DPTAC framework was created in 2008, there are elements of it which are now out of date. Before it becomes a mandatory part of all DPPPs, it should be updated to reflect both the Equality Act 2010, and changes in best practice.

Recommendation: DPTAC work with ORR to update their training framework.

Recommendation: All TOCs update their DPPP to ensure their staff training adheres to updated DPTAC training framework.

3.2 Quality assurance of training - Question 16

- 3.2.1 For disability awareness training to have an effect it is necessary for quality assurance to be carried out. Not only will this allow consistency across the

network and TOCs to evaluate their performance, but will also give the travelling public confidence that high standards are being maintained.

- 3.2.2 We have recommended that the DPTAC training framework should be used by all TOCs in the development of their staff training. As such, it follows that DPTAC themselves will be best placed to evaluate whether this standard is met.
- 3.2.3 As DPTAC have no regulatory role themselves, they would have to be able to work with the ORR to ensure that providers falling below required standards improve their training.

Recommendation: DPTAC be given the role of verifying the quality of disability awareness training, and be able to direct ORR to require improvements from providers found to not be meeting the required standards.

Section 4: Monitoring

- 4.1 The recent studies from the ORR represent the major dataset on accessible travel and assistance currently available¹². However, we have some concerns about this dataset due to the over-representation of older people within it. Partially this is because there are more disabled people under 65 than over 65¹³, and younger people use the rail network more than older people.¹⁴
- 4.2 This leaves open the possibility that the sample for this study was not representative of disabled people attempting to use assisted travel. This is particularly concerning given the lower prevalence of ‘hidden’ impairments among older respondents¹⁵, when we know from disabled people that one of the main areas of difficulty is that many staff do not anticipate the needs of disabled people whose impairments are less visible.
- 4.3 As such, future studies in this area need to ensure they reach a large sample of working age disabled people, including those with invisible disabilities. This would ensure the findings reflect the reality experienced by many disabled people attempting to use assisted travel.

Section 5: Disabled People’s Protection Policies

5.1 Guidance on writing DPPPs - Question 20

- 5.1.1 There have been significant changes in transport policy over the last eight years. As such, it is appropriate that the guidance on writing DPPPs be updated to reflect these changes. We feel that the outlined approach

Accessible information is patchy to non-existent and simply concentrates on mobility impairment and some simplistic stuff around sensory impairment.

¹² Office of Rail and Road (2017c) Op. Cit.

¹³ Department for Work and Pensions (2017), Family Resources Survey: financial year 2015/16, <https://www.gov.uk/government/statistics/family-resources-survey-financial-year-201516>

¹⁴ Department of Transport (2017) Rail Passengers Factsheet https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590562/rail-passengers-factsheet-2016-revised.pdf

¹⁵ Office of Rail and Road (2017c) Op. Cit.

to updating the guidance covers a number of valuable points.

- 5.1.2 However, we also feel that this should be an opportunity to strengthen the involvement of disabled people throughout the transport system. The current guidance requires that DPTAC be consulted on any changes, alongside Transport Focus. While this oversight is valuable, it has shortcomings. DPTAC are, by their very nature, a nationwide group who may lack local expertise. Transport Focus, while experts, are a group of non-disabled people who can only consult with disabled people.
- 5.1.3 Disabled people are experts in their lives and experiences. In making changes that affect this group, it is essential that they are involved at every step. To ensure this, TOCs should consult with organisations of disabled people local to the areas they serve. This will ensure that their services are built around the experiences and needs of disabled passengers. It will also give TOCs the opportunity to increase knowledge of Passenger Assist.

5.2 Reviews of DPPP's - Question 21

- 5.2.1 It remains welcome that TOCs are required to consult with DPTAC and/or London TravelWatch if they are making significant material changes to their DPPP, or if a new DPPP is being produced.
- 5.2.2 However, it is likely they have more expertise in navigating the transport system than can be expected of disabled people generally. We are aware that DPTAC work to minimise the effect of this, but we remain of the opinion that broader consultation would be beneficial. As such, we recommend that where a TOC proposes a significant change to their DPPP, they should have to demonstrate significant engagement with disabled people who are not already familiar with the document.

Recommendation: Where significant changes are being made to a DPPP, the TOC in question be required to demonstrate broad engagement with disabled people.

- 5.2.3 This engagement should be carried out at a sufficiently early stage that disabled people are able to be involved in shaping the policy, rather than simply being consulted on a change.

Section 6: Enforcement of standards

- 6.1 The changes proposed in this consultation have the potential to significantly improve disabled people's experiences of assisted travel. However, the majority of proposed changes relate to guidance or direction from the ORR. These changes need to be enforceable in order for improvements to be made.
- 6.2 While existing ORR frameworks allow significant action to be taken against TOCs who fail to meet accessibility criteria, these powers are rarely used. From 2020, once all rail services are required to be accessible, the ORR should adjust their guidance to ensure that issues of inaccessibility are examined in all cases, and that failings are met with a requirement to improve as a minimum.

Recommendation: The ORR ‘Health and safety compliance and enforcement policy statement’ be updated to ensure that all potential breaches of RVAR be investigated, and that where a breach is found it will result in an improvement notice or material sanction.

Section 7: Spontaneous Travel

7.1 The ability to travel without making prior arrangements, or to change plans at short notice, is a crucial element of living independently for many disabled people. While services such as Passenger Assist can be invaluable in assisting disabled people using public transport, they should not be seen as a sufficient alternative to having provision in place for spontaneous travel.

7.2 Three quarters of disabled people responding to a recent Muscular Dystrophy UK survey said that they would prefer to be able to ‘turn up and go’, rather than rely on the current system of pre-booking.¹⁶ This ability to travel on demand is reliant on having staff available at stations or on trains to facilitate any adjustments that a disabled person may require.

I would really like to be able to travel on all trains as I used to that is, to be able to decide when and where I travel at short notice.

7.3 At the moment, the entire London Underground operates on a ‘turn up and go’ basis. In 2015, this service was trialled at 34 National Rail stations across London.¹⁷ An evaluation of this trial has still not been published, and there are no signs whether it will be continued.

7.4 At current, there is a ‘turn up and go’ system in operation across the rail network. This ensures that where disabled people have not booked assistance in advance, staff will ‘where reasonably practicable’ provide assistance to them.¹⁸ While valuable, this is significantly less expansive than the TfL scheme, which guarantees assistance regardless of booking.¹⁹ This ensures disabled people have both independence and confidence that their needs will be met.

7.5 We have previously recommended that the RDG work with TOCs to introduce trials of TfL-style ‘turn up and go’ schemes to other major transport corridors, with a view to expanding this to a nationwide scheme.

7.6 Alongside this, an awareness raising campaign will be needed to instil confidence in the availability and consistency of support. Many disabled people know from experience that travelling spontaneously is often impossible, and as such will not attempt it without significant guarantees that

¹⁶ Muscular Dystrophy UK (2015) End of the Line, http://www.musculardystrophyuk.org/app/uploads/2015/04/End_of_the_line_2016_FINAL.pdf

¹⁷ Rail Delivery Group (2015b) London Turn Up and Go trial for disabled passengers. <https://www.raildeliverygroup.com/media-centre/press-releases/2015/190-2015-05-11.html>

¹⁸ Office of Rail and Road. (2009) How to write your disabled people’s protection policy. http://orr.gov.uk/_data/assets/pdf_file/0015/5604/how-to-write-your-dppp.pdf

¹⁹ TfL. Help from staff. [Web page] <https://tfl.gov.uk/transport-accessibility/help-from-staff>

the turn up and go system will work. This awareness raising should be supported by the ORR.

Recommendation: The ORR work with the RDG and TOCs to promote the existing 'turn up and go' schemes, and any expansions of these schemes.

For more information please contact:

Simon Dixon, Policy Adviser

Please find below my responses to the consultation on Improving Assisted Travel

Chapter one - Raising passenger awareness

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

- The DPPP can be advertised on posters in Stations, and also on trains.
- Use of stands to advertise Assisted Travel at key stations – a rotational roadshow. This could be advertised in local CABs, Doctors surgeries, churches, schools, libraries etc

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

From a customer perspective, there is no reason. Sufficient lead time needs to be built in for budgeting purposes.

Q3. What steps can be taken to increase website accessibility?

Audio

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We could have question time slots for Assisted Travel. We are also considering getting video blogs done by users of the service to explain how to use the service and what to expect.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Our Accessible Travel page is currently one click from the home page. This then has subpages for the user to select the area that they wish to read about in more detail.

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

The whole process should be simplified and more connected – so yes. There may be challenges with the technology of the booking app/desktop website but these should be overcome to instantly populate the assisted travel request.

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

- Develop a targeted campaign.
- The RDG could also play a role in promoting all TOCs accessible travel policies and services across the country as customers may often use more than one service to travel from A to B

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

- Invite agencies to participate in stakeholder groups
- The list of third party agencies can be huge covering a whole country and therefore it is important to prioritise given the limited resources available to do the engagement both in the rail franchise and also the third party agency.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

- Use of customer focus groups to provide feedback on the effectiveness of the communications. We use a Stakeholder Equality group to review communications and provide feedback on how to improve awareness of the services offered.

- Regular review of data being provided to ensure there have been no material changes in station accessibility.
- The current NRE website does not facilitate easy communication to customers on step free access at stations. The language used should be simplified and standardised across the network.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

- Yes, a minimum standard across the industry should be in force for service provided, language (terminology) used. Problems can occur when passengers transfer between services and expectations are not met.
- Yes, the RDG should drive an industry protocol.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

- This should be an industry wide approach as it could lead to issues if refunds are given by one operator and not another.
- Consideration will need to be given to the practicalities when using more than one service, and ensuring that the delayed service notifies onward connections for assisted travel bookings. This could impact on resources at the final station.

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

- As a new policy, this would have financial implications from a budgetary perspective.

Chapter three – Strengthening staff training

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

- Potentially a common supplier that delivers training to each TOC to ensure a consistent standard. The training can then be rolled out by each TOC
- An e learning module supplemented by classroom training
- An industry App for smartphones detailing key facts and tips, maybe also video clips

Q14. How frequently should disabilities training take place and its content be refreshed?

- Annual refresher – could be elearning or broken down into short sharp classroom sessions
- Initial training on key disabilities, including hidden, should be carried out upon appointment to any customer facing role

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

- How often would DPTAC be reviewed and updated? It has not been updated since 2008.
- I believe that a review should be carried out with operators to see if they using this framework or not before deciding on making it mandatory. If it is not being widely used, the reasons should be looked into before coming up with a solution in case there is a more effective solution.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

- Whilst verification demonstrates the quality of the training delivered, it does not, I believe, demonstrate good performance or quality of service delivered to the customer. The results of such verification would have to be taken in context alongside other data on customer satisfaction for the operator. I think there is a danger that the results would produce a league table that adds little value.
- Verification could be carried out by the ORR or RDG

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

- We carry out mystery shopping research for our assisted travel across our network each year.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Not to my knowledge

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

- Consideration should be given to how audible smart devices such as Alexa, Google etc can be used to get information on booking assisted travel

Chapter five – Reviewing DPPPs

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

Agreed. It is important that the DPPP is an output based document written for the customer.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

Agreed

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Improving Assisted Travel: a consultation

Response from the Scottish Accessible Transport Alliance (SATA)

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Annex one

Summary of consultation questions

Chapter one - Raising passenger awareness

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

A1. The Passenger Document needs to be available in places where passengers loiter – waiting rooms, booking/ticket places which are ‘enclosed’ indoor places where they may have to wait. A quick ‘pass-through’ environment is no use.

For the more than 50% who have never heard of it, the term ‘Passenger Assist’ needs to be prominent and strongly promoted.

Posters and leaflets in themselves do not attract the attention of the visually impaired (and probably not of those with a learning disability or some mental health problems) and the help of other people is required to promote and publicise the services offered. Word of mouth is always the best way of highlighting services, this is where the operators could be enhancing their liaison with SATA and other agencies such as the Access Panels at a local level to raise and promote assistance awareness.

A free phone number for further information should be available. A weakness of the Consultation Document is that it completely ignores the issue of unstaffed stations (of which there are far too many in Scotland). A passenger waiting for a train at an unstaffed station is in a vulnerable position and although it may be possible for the passenger to make a telephone call to a contact centre, such a call may be answered by an operator many miles from where the passenger is waiting. ORR needs to take seriously the issue of vulnerability of passengers (including assisted passengers) at unstaffed stations.

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

A2. It should certainly be expected. There should be no need have to legislate for it.

Q3. What steps can be taken to increase website accessibility?

A3. While all the ones we have checked do have the DPPP guidance and policy document on their websites, finding them is not easy. Some are 4 or 5 levels down in menus, and you need to know what you are looking for. Fortunately, most give useful information before referring to the formal documents as a last resort.

It is important to have websites tested by groups of disabled people such as for example the local Access Panel to ensure that websites are accessible to people experiencing a widely different range of disabilities.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

A4. Post case studies and good examples Use the term 'Passenger Assist'. Expose the range of the service. But not all use social media, so full use of other media channels is important.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

A5. Now that most sites are designed to be mobile-friendly it's not possible to show everything on the home page. The question is where to put PA, some have it in 'travel information', some 'the experience',

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

A6. It is a help if it can be. You need to know that tickets (at the price you want) are available AND that assistance will be available before you book either.

On-line booking of assistance is currently problematical with some companies. Options for 'type of assistance' which offer 'visual impairment', 'learning disability' etc as 'types of assistance' are misleading. The type of impairment does not indicate what help is needed! Also, if phoning, once you have identified yourself and have used the system previously the agent pulls up your details and knows what you require. With the on-line system you have to go through everything each time. It needs to be remodelled to do client identification first, then pull out and pre-fill the form with your standard requirements.

Visually-impaired travelers have been unable to use the on-line system due to the anti-spam security system (being required to type in something they could not see).

It must be made as simple as possible both to buy a ticket and to book assisted travel whether through a website, by telephone, at stations or through a third party such as a tour operator.

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

- A7. Even promoting through DPULO's does not work. Many who could use the service are not members of these organisations, and many are not regular users of trains and so would not see posters in stations. Promotion needs to be done through through libraries, health centres, surgeries, pharmacies, social clubs, day care and community centres where the people are. For example, in Midlothian, all the libraries have a carousel with travel information stocked through the Council's Travel Team.
- Q8. How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?
- Q8. No answer.

Chapter two - User experience; improving the reliability of communications

- Q9. How might the reliability of communications be improved?
- A9. In general, it's good, e.g. with 'turn up and go' phoning the destination station; dealing with changes (e.g. platforms or times) not so good.
- The document seems to be concerned with the communications between various train operating companies but largely ignores the need for train operating companies to improve communications to assisted passengers. For example a telephone call to a passenger the day before a booked passenger assist to check that the passenger still intended to travel and there had been no change to the timing of the journey would be helpful to the assisted passenger.
- Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?
- A10. In view of the obligations already undertaken by train operators to assisted persons under their Disabled Persons Protection Policies it is thought that such a protocol could only relate to co-operation amongst the train operating companies themselves. For example, where a passenger is leaving from a station operated by one train operating company and arriving at a station operated by a different train operating company. It is unlikely that many assisted passengers would be aware of the existence of such a protocol but anything that will improve the service to passengers will be welcomed. Equally the leadership of the RDG in this area would be very welcome.
- Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?
- A11. This would seem reasonable, but is less well-defined than, say, lateness. If the

assistance required were a ramp and no staff appeared to set up the ramp, that is clear; but if the assistance were to get a mobility-impaired person with luggage from platform to train and another passenger facilitated this, would there still be justification for compensation? Probably, not a good example, but illustrates the point.

In principle this is a good idea, but it has to be borne in mind that, from the point of view of the passenger, the loss sustained by the passenger may be a lot more than the price of the ticket. For example, taxi fares from home to the departure station. There is also an opportunity cost which may be quite significant (for example loss of opportunity to attend a one-off event such as a funeral or a wedding or a sports event (for which the passenger may have bought a ticket.) Equally if the failure means that the passenger is unable to attend an event or go on a holiday for which the passenger has booked accommodation the loss may be quite significant. A compensation scheme needs to provide redress for such losses where they can be established.

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

A12. No.

Chapter three – Strengthening staff training

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

A13. Ensure the DPTAC framework is up-to-date and appropriate. Training needs to be more than just completing online training materials, it needs to involve disability led organisations (of which SATA is one) and should have as part of it a session involving training by disabled people. Organisations such as DPTAC, MACS and DES (Disability Equality Scotland) should be involved in devising training programmes.

Q14. How frequently should disabilities training take place and its content be refreshed?

A14. Require that all staff receive training appropriate to their role within a specified time of taking up that role, and refresher/update training at specified intervals (5 years? 2 years is too frequent unless there are major legislation changes).

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

A15. Yes. Absolutely because of the amount of time and effort in producing the DPTAC training framework in the first place.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who

are struggling?

A16. Yes. It is suggested that DPTAC would be ideally placed to carry out this task with the involvement of MACS regarding training provided in Scotland.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

A17. No knowledge in this area.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

A18. No knowledge in this area.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

A19. No knowledge in this area.

Chapter five – Reviewing DPPPs

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

A20. Yes. The proposed approach seems reasonable in particular the emphasis on reviewing material changes

Q21. Do you agree with our proposed approach to reviewing DPPPs?

A21. Yes. The proposed approach seems reasonable in particular the emphasis on reviewing material changes

General comment

There is a lot in the Consultation Document to be welcomed especially the emphasis on providing the passengers with a seamless end-to-end journey. Nevertheless, the document has significant weaknesses. It is too focused on the internal working of the rail industry and is not presented in a style that makes it easy for assisted passengers to know to which questions they are expected to respond.

It is thought that train operators should be encouraged to move from a system of

pre-booked assistance to one of Turn up and Go assistance as this would be particularly beneficial to disabled passengers, though it is recognized that it is reasonable to expect assistance to be pre-booked on the small number of long-distance journeys for which tickets need to be purchased in advance and seat reservations made.

Shaw Trust Response to ORR Consultation on Assisted Rail Travel

1 February 2018

1. About Shaw Trust

Shaw Trust is a national charity with a thirty year history of supporting people to achieve their full potential. Helping 50,000 people a year from over 100 locations across the UK, Shaw Trust supports people to enter work and to lead independent and inclusive lives. Shaw Trust delivers a range of Department for Work and Pensions (DWP) funded employment services provision for disabled people and those with health problems, including Work Choice, Work Programme and has just started delivering the new Work and Health Programme.

In 2014 Shaw Trust merged with the Disabled Living Foundation (DLF) which provides impartial advice, equipment and training on assistive technology to enable which enables people to live independently. DLF also runs the Youreable website, supporting 60,000 disabled service users a year with advice on benefits, travel and health.

In this submission we have included results from Shaw Trust focus groups with our disabled employees to capture their experiences of using rail transport (19% of Shaw Trust's staff members have disclosed a disability) as well as results from a survey completed by both users of the DLF *Youreable* forum and participants in our employment services provision (these results were originally included in our response to the DfT's consultation on its draft accessibility action plan in November last year, but are also very relevant to this consultation). This response also draws on Office of Rail and Road (ORR) and Disabled People's Transport Advisory Committee's (DPTAC) passenger research.

2. Summary

- This submission draws on our user surveys and focus groups results which reinforce the ORR's findings about a serious lack of awareness of assisted travel and a significant untapped demand for these services. Despite public transport being the single most prominent local concern for disabled people, they make a third fewer journeys than non-disabled people.
- On top of this lack of awareness and use of assistance services, our surveys found that implementation of assistance schemes are inconsistent. Many of our survey respondents reported numerous experiences of companies and staff not delivering services they are obliged to provide.
- We have therefore made recommendations on improving advertising and marketing, internal communications and performance metrics. These recommendations are aimed at increasing the use, awareness and effectiveness of the Passenger Assist and 'Turn Up and Go' schemes, and DPPPs more generally. We have also reiterated the related recommendations submitted to Department for Transport's (DfT) consultation on DPTAC's latest Accessibility Action Plan in November 2017.

3. Introduction – the additional transport barriers facing disabled people

Although there has been investment in improving the accessibility of public transport, particularly rail, Shaw Trust research shows much more needs to be done to ensure that it is accessible and inclusive for disabled people.

Over the past fifteen years, the DfT (via DPTAC) has produced several Accessibility Actions Plans. Both in 2002 and 2017, the DfT found that transport issues are the single most prominent concern for disabled people at local level. Despite this, in both 2002 and 2017, disabled people still made a third fewer journeys than non-disabled people.¹ Action is therefore needed to swiftly change this picture in time for the next Accessibility Plan.

Tackling barriers to the accessibility of rail, means more than just adapting trains and stations. It also means ensuring that all elements of the system (e.g. infrastructure, operating systems, network designs, planning and investment strategies, advertising and public information material, staff information and training resources) are all accessible and inclusive for disabled people. We therefore very much welcome the ORR's proposal to introduce a cross industry protocol on disability access. This needs to cover Passenger Assist, 'Turn Up and Go' and the development and implantation of Disabled People's Protection Policies more generally.

4. Lack of information and inconsistent implementation

The ORR's findings about lack of awareness amongst disabled people of Passenger Assist and, particularly, 'Turn Up and Go' (i.e. 86% of people having never heard of this scheme) are extremely concerning. Other passenger research very much reinforces these results, and the overall finding in the ORR's assisted rail travel consultation document that *"there is a lack of awareness of Assisted Travel and a significant untapped demand for the services"* (pg 5).

For example, 70% of disabled people are unaware about any type of specific scheme to help them with travel by train. More importantly, only 10% have seen information from train operators about disabled passengers' right to assistance.² Shaw Trust's own focus group and survey work also reinforces this. Many of our respondents commented that they don't know how to book assistance because *"they had never seen information at stations"*. Of disabled people who feel that trains are currently inaccessible, 46% of these stated that they would use public transport at least once a week if more support was available.³

On top of the lack of awareness of services that the rail industry should provide to disabled people, our survey found that the implementation of passenger assistance schemes is inconsistent. Too many individuals in our surveys and focus groups said they had significant experiences of rail companies and staff not delivering passenger assistance services they are obliged to provide. While 75% of train carriages are now accessible⁴, too many individuals with disabilities still cannot access the improved train service. Fewer than 50% of passengers receive the service they have booked through Passenger Assist.⁵ The following examples from our research highlight the challenges that many disabled face when travelling by train.

¹ *Attitudes of Disabled People to Public Transport*, DPTAC, 2002

² *Disability in the United Kingdom*, Papworth Trust, 2017.

³ *Disabled People's Awareness of Assistance from Train Operators*, Office of Rail Regulation, 2014

⁴ *Accessibility Action Plan Consultation*, Department for Transport, 2017.

⁵ *Disabled People's Awareness of Assistance from Train Operators*, Office of Rail Regulation, 2014.

“It’s almost impossible to spontaneously travel by train. Despite having a wheelchair ramp booked at least 24 hours prior, I have been refused access to trains in spite of making reservation. One example was simply because the operator ‘forgot’ to include a carriage C with sufficient accommodation for pre-booked disabled customers who use wheelchairs. I don’t choose to use my wheelchair, I have to. It isn’t a lifestyle choice.”

“Assistance very rarely appears at destination.”

“The main problem travelling on trains is, as a wheelchair user, the lack of assistance, even if it is already booked. My local station is run by one train operating company who only staff the station in the morning peak. The rest of the day the station is unmanned. Traveling is bad, as the driver cannot leave his cab to deploy the ramp – and even if he did help the train would run late which is not allowed I am told – and I am left at the platform. I know London has the spontaneous ‘Turn Up and Go’ at major stations which is great. Unfortunately it doesn’t work out in the sticks at unstaffed stations with driver only operated trains.”

“I have twice been left on the train until it got to the nearest station, 23 miles away. This was despite assistance being booked which often just doesn’t materialise.”

“There is often no assistance or excessively late support at stations to assist with ramp access off of the train when I have arrived at my destination station even though it has been booked prior to journey. I travel on my own without an assistant or a carer. I find myself leaning from my wheelchair out of the door hanging onto the side handle so I do not slip, reliant on a member of the public who I am stopping getting onto their train, to get someone to get me off the train.”

A significant proportion of people we surveyed also shared stories of harassment by other passengers on public transport, including trains. Sadly, this is not surprising. External research surrounding disabled people’s lived experiences of using public transport demonstrates that discrimination by passengers against disabled people remains a key barrier to access.⁶ 58% of disabled people say that using public transportation is a “horrid experience.”⁷ As one of our survey respondents explained:

“I have been called a [deleted] cripple as I held the train up whilst the ramps were being deployed. My wheelchair has been knocked about by people passing me. When the train has been busy I have had people standing all around me deliberately punching me in the side because I have a large wheelchair taking up the wheelchair space. I have not been able to get help as there was no guard on the train and the ‘disabled passenger alarm’ thing often doesn’t work or is ignored by the driver – as often children set it off I am told. Or the driver cannot see me in my wheelchair on the CCTV when the train is full and standing.”

5. Policy Recommendations

⁶ *Disability in the United Kingdom*, Papworth Trust, 2017.

⁷ *Disability Discrimination on Public Transportation in the UK*, Transport for All, 2012.

Given this lack of awareness and inconsistent implementation of passenger assistance schemes, we very much support the ORR's consultation recommendations on a cross industry protocol, improved staff training, enhancing of existing monitoring mechanisms, updating DPPP guidance and reviewing them annually.

We would like to put forward the following policy recommendations, particularly in response to **consultation question 1** on *"How can rail operators improve the availability and promotion of Assisted Travel information in stations?"*, and also to support the development and implementation of DPPPs more generally:

- **Advertising and marketing of the Passenger Assist and 'Turn Up and Go' schemes** to increase awareness and use of it by passengers. The very successful multi-channel approach taken for the anti-terrorism *"See it. Say it. Sorted"* campaign could provide a good model for an effective campaign on the Passenger Assist scheme.
- Increase awareness of the Passenger Assist and 'Turn Up and Go' scheme, amongst staff at stations and on trains and train them in their roles and responsibilities under DPPPs through **disability equality training and comprehensive internal communications campaign**, which should be properly co-ordinated and joined up across the rail the industry.
- As with other aspects of performance on the rail network, particularly in relation to passenger service and satisfaction, we believe metrics should be introduced to **measure awareness, satisfaction and performance of Passenger Assist and 'Turn Up and Go' schemes**, especially in the light of the very worrying survey results set out in the ORR's consultation document regarding lack of awareness, and the often poor performance, of these schemes (we note that the ORR has asked the rail industry what data they currently gather, and we look forward to seeing those results).
- By **identifying and spreading best practice**, the ORR can show what excellent performance looks like – e.g. through its *'Shaping up'* consumer report - with regards to Passenger Assist, 'Turn Up and Go', and rail accessibility through DPPPs more generally. In Shaw Trust's experience, the work being done on train and station accessibility by High Speed 2 is a good example of best practice for the rest of the industry to follow.
- The ORR and other organisations and companies across the rail industry should also strive to join the government's **Disability Confident scheme**⁸, if they are not already.

- **Relevant DfT accessibility action plan recommendations**

In our response to the DfT's draft accessibility action plan consultation, in November last year, we made the following recommendations which are also relevant to this ORR consultation on assisted rail travel, and our recommendations above:

Policy recommendation 1: DPTAC should recommend to the Department for Transport that they require all train operating companies to update their Disabled People's Protection Policies - **DPPPs - to include provision about how they will fully advertise support services for disabled people.**

⁸ Disability Confident aims to get more disabled people into employment, and reduce the employment gap between disabled and non-disabled people, by providing employers with the skills, examples and confidence they need to recruit, retain and develop disabled employees. More information and resources can be found at: www.gov.uk/government/collections/disability-confident-campaign

Policy recommendation 2: The Draft Accessibility Action Plan should ensure that train operators are fully adhering to their DPPP. This should include the Department for Transport updating statutory regulations to **improve performance management frameworks that monitor implementation of DPPP**. New performance management frameworks should also include disabled people's experience of traveller assistance to enable performance to be effectively monitored.

Policy recommendation 3: The Draft Accessibility Action Plan should include a new plan to **measure the impact of future financial investments in accessibility**. Previous financial investments from government are not tackling key barriers disabled people face, and any future financial investments should demonstrate how they are addressing key barriers.

Policy recommendation 6: The Draft Accessibility Action Plan should include recommendations on how the Department for Transport can launch a **public campaign to tackle the discrimination** disabled people experience when using public transport.

Policy recommendation 7: The Draft Accessibility Action Plan should outline how the government can introduce legislation to require all staff working on public transport to **undertake disability equality training**.

Shaw Trust accessibility and training services

Shaw Trust is committed to helping businesses become more accessible and inclusive to disabled people.

As discussed, when we met with ORR to discuss this consultation, we can offer the following equality, accessibility and training related services to the ORR, and the rail industry more broadly;

- We are able to offer businesses that are recruiting disabled people into their organisations, a **range of training packages** – such as Disability Equality Training – for new and existing staff.
- We are pleased to be referenced in the consultation document, as an organisation that can advise on improving website accessibility (pg 18). With regards to the ORR's consultation questions on plain language of customer facing material, as well as website, social media, online booking and the ORR's long term aim to develop a reliable Rail Availability Reservation Service, **Shaw Trust's Accessibility Services team** can offer rail organisations expert advice to improve the accessibility of their websites and digital footprints. We can offer an initial online audit and consultation free of charge to rail industry organisations.
- As we did to inform our submission to DfT regarding their accessibility plan, we can arrange **focus groups and surveys of disabled people**, in order for rail industry organisations to test their policies and procedures.

For more information on this submission contact:

Mark Hoda, Policy and Public Affairs Manager

Sheffield Transport 4 All proposals to improve Customer Assistance:

This response is submitted on behalf of the Sheffield Transport 4 All group, a group comprised of people with a variety of physical, sensory, and communication difficulties, which was set up with the following aims:

- To promote the adoption of a social model of disability by the Passenger Transport Executive (the PTE), local transport service providers and the Sheffield City Council, in all their transport activities.
- To act as a pool of expertise to advise the Passenger Transport Executive (the PTE), local "public" transport service providers and Sheffield City Council on all aspects of transport provision and transport infrastructure for people with disabilities.
- To champion the interests of people with disabilities in gaining equal access to transport and transport services in Sheffield.
- To implement such access by:
 - Consulting with, and advising, the City Council, PTE and transport providers.
 - Having input into the plans of the above organizations.
 - Identifying key issues and drawing up work plans.
 - Evaluating audits and monitoring reports conducted by or on behalf of the Group.

This also includes seeking to influence national standards, consultations, and protocols which often significantly define the successes and failures of our local transport experience.

Chapter one - Raising passenger awareness

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

Passengers booking tickets at stations where there is clearly the potential for the customer needing assistance should either be offered the ability to make a booking there and then, or staff should be supplied with cards specifically for advising how to make a booking, and how to apply for a Disabled Persons Railcard.

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

All TOCs DPPPs should start with the same nationwide standards that can be expected and are the minimum standards. TOCs can then state how they will exceed this later in the document. Compare this with the National Rail Conditions of Travel which now has a great short summary of key points. Crystal Marking this nationwide standard summary is a great idea. If TOC specific items prevent standardisation, then one or two variants should be broken out into a reference table. E.g. If one TOC has no staff other than a driver on-board, but most others use a train manager to facilitate assistance in disruption then providing information to passengers of that TOC, and what to do on other train companies. A national number to reach out to where

disruption or other assistance failures occurs is vital as it is unreasonable for passengers to need to have the numbers for all TOCs on a multi-TOC trip.

Q3. What steps can be taken to increase website accessibility?

Compact, clear, advert free websites make the world of difference for people with Visual Impairments, but who still have some vision and do not use screen readers. National Rail Enquires (NRE) and Rail Delivery Group (RDG) should remove or provide ad free sites or formally commit to supporting traintimes.org.uk. This is the rail journey planner for many VIPs as it is clear and only provides the information I need. As NRE are providers of impartial and legal information this remains with these entities and not TOCs. Does NRE/RDG have a DPPP?

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Please consider carefully which disabled communities you are aiming to reach and the outlets you use. Some might well opt out of some forms of social media. E.g. visually impaired people can be saturated with just e-mail and text messages and so only use them - without bringing more information flow from social media channels.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

No obstacles surely, if TOCs have concerns about too many assistance requests then it might be appropriate to have an "accessible booking engine button" in a prime site such as the top bar of the website. This could provide for ticket purchase, but also lead to a book assistance only area. It must be clear on how to book for multi-TOC journeys.

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

This depends on your intention using the word intrinsically; there should be no requirement to buy tickets in a particular way to book assistance as is currently the case.

However, we wholeheartedly support the ability to buy tickets and reserve the wheelchair zone, and book assistance in one transaction as an essential provision. Anything else forces people to take 2-3 times longer as a disabled person to use the rail services and makes it unclear how to access the Advance fare products if you are a wheelchair user.

Such a mechanism should also allow booking of all other forms of assistance and allow seat reservations for VIPs etc. This should not restrict people to only airline seating however, (most priority seats are of this category) and should provide the ability to choose a table etc. This is important because when travelling for work, time should not be lost because of not having the

space to use a laptop, be able to eat and drink etc, which are important, particularly for longer journeys.

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

See Q8 as this could lead to broadening contacts for rail companies and enhancing their community engagement. Taking the opportunity to share what's possible, some interesting accessible locations etc. can make a big difference. As an example I am a visually impaired person, I encouraged my friend who is a wheelchair user to give it a whirl and join me on a trip to Edale. Train travel was never really contemplated for him, but this opened him up to the possibilities and he now uses the railways for some leisure and day trips. Therefore, engaging once a quarter with a selection of groups such as Transport 4 All in cities the size of Sheffield could have a big impact for a moderate investment.

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

As a pan-disability group in the Sheffield area we are surprised at the low engagement of rail operators in our quarterly meetings. We would like to see some presence particularly from the station operator, but also potentially other TOCs. The opportunity to consult on changes, fore-warn about upcoming changes etc. would assist passengers in being ready for change and increase community engagement and patronage. The station manager does engage with us in terms of site visits for improvement suggestions to the building, but it seems another individual would be the person for T4A meetings for the journey experience and industry wide changes to ticketing, assistance mechanisms etc. The roll out of RARS in particular should see all TOCs seeking to reach out to local user groups, especially ones such as ours which are directly linked with the City Council. Clearly a fall-back on to e-mailing everyone who has used PA is an option but the opportunity to ask questions can be invaluable.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

Passenger able to read the RARS system themselves on the day, if they are a regular traveller, could massively aid confidence. This assumes that the plans include message passing or confirmation of arrival, despatch on to a particular service etc are being provided in the system for staff. Knowing messages have gone out allows the passenger to know communication has happened and be at ease. During delay or disruption this should also aid communication of the new service a passenger is on and allow the passenger to know that information has been done. Finally, we hope the system considers how to alert staff at any station or unplanned change location because such

situations have a high impact on passengers if they are unfamiliar with the station and staff location to seek help.¹

Passengers also need the ability to be able to cancel assistance requests on the day to assist staff who can often be chasing ghost jobs which harms motivation. In reality this also means passengers being able to notify the origin station that they will need to take a later service because of overrunning meetings, or other unplanned circumstances. Passengers ideally should have a lightweight process that allows them to do this online as well as over the phone.

For staff benefit please ensure the sort order of incoming passengers for rail assistance staff is linked to actual train arrival times so that it is a useful tool to duty managers and staff. Please also consider on board staff as they could assist in successful assistance off the train where this helps to maintain the timetable.

The industry wider protocol could consider the following:

- Multiple passengers can be located throughout the train, how are on-board and station staff to best work together on these occasions? We suggest that this protocol considers:
 - Whether certain classes of assistance are the priority of station staff (e.g. Ramp deployment).
 - Assistance in alighting for able bodied passengers can be provided by on-board staff who can confirm platform staff are either aware or on their way.
 - Alternatively, on busy services considering whether station staff prioritise for example the front of the train, and on board staff the rear of the train.
 - and to maintain the timetable whilst successfully assisting passengers

It is essential that the relevant rail information systems accurately communicate to staff the orientation of the train before arriving at the station, so staff can be in the correct place. This is not for RARS, but needs to be part of good TOC operations to benefit all passengers. In Sheffield XC services are often in reverse formation and this is not communicated for inclusion in the CIS and audio announcements. XC in particular really needs to understand how it can co-operate with other TOCs to pass on the necessary information, if necessary with NR systems being invested in to share such details efficiently. **We would welcome RDG/ORR rolling such considerations in to DPPP guidance, and identifying how to implement this across TOCs. As passengers we feel this is feasible as within TOCs they have a protocol for reporting trains in reverse formation so that this is corrected for future stations on the line.**

¹ For example, travelling from Euston to Tamworth to change for Sheffield (this was the cheapest fare at the time). When the service was terminated at Milton Keynes Central because of an 'incident' (an unscheduled stop) there was no mechanism to support one of our members to resume their journey.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

YES - ORR/DfT should ensure that the new DPPP standard mandates full adoption of new systems, recommendations of this and the DfT's Accessibility Action Plan (AAP) on all TOCs as half of my trips are multi-TOC and it is vital that this area improves. Please see some suggestions of issues to consider when writing the protocol in the previous question. This protocol of course does not preclude TOCs from having enhanced systems etc where a journey is single operator and the results should be shared with RDG.

Whilst we are not in a position to categorically comment on who is best to facilitate this, we are open to RDG being the best implementation body. However, if this is not effective we would like the ORR to be in a position to take over implementation and charge TOCs for what it costs to effectively implement these essential changes for social inclusion and productivity of disabled persons in society. Challenging but achievable goals should be set and monitored to enable this.

Whoever implements such systemic changes must understand that it is vital that users are integrated into the development team, and/or have a robust consultation process to ensure the most effective results. This will help gain better results both for the rail industry and the full breadth of disabled passengers.

The gaping hole in this consultation is not acknowledging the impact of disruption and trains stopping short of the planned station and ensuring how passengers are not abandoned in this situation. We believe a rolling programme is required to implement such information and message passing rather than the implied single iteration approach. The architects of RARS should be aware of these issues at conception even if implementation is performed at a later phase. Example data would need to include train passenger is on, which train that becomes during disruption, or even whether transferred to Accessible Alternative Transport (AAT).

We would also like to highlight that a rolling programme of development for RARS is required. In particular as we highlighted earlier, this consultation leaves a large gap in considering how to fundamentally fix the massive breakdown in assistance provision that delays and cancellations cause. This is clearly a second phase of development which is required so that those are completely reliant on assistance can have confidence to travel. In reality there will be a few phases to test and refine such a development of support systems and protocols and it would be a well-received commitment to see a this over an extended period. Particularly as we anticipate the cost and delivery of both day-to-day running and development and improvement until all systems are brought up to the level which the DfT/ORR/Ministers are aspiring to.

In terms of implementation, it may assist passengers and the wider industry to have RARS use a different letter combination in reference numbers for on the

day requests. This would enable passengers and staff to understand prioritisation, service levels, and refund arrangements and incentivise booking ahead. It is vital however, that passengers who have to amend a journey time but pre-booked a trip retain a pre-booked reference code (so a PA number in today's system)

Passengers need a standard process for all TOCs to make it clear what the TOC will do to be aware of pre-booked passengers and their needs when the itinerary is forced to change by delay or cancellation. RARS is probably the best long-term solution even if a several phases of development is required to implement message transfers or live itinerary modification. However, TOCs and passengers should identify a process and publicly publish this now, and a national summary provided. Additionally, a national fall back number that passengers can call is essential to allow passengers to access assistance where it does not arrive and can facilitate disruption assistance. This will require good linking with TOC control centres or stations. This is required as if trains are cancelled at stations operated by another TOC then there will be no expectation of assistance provision from that stations staff and the passengers should never be expected to have every TOCs number to reach out.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes – however, it is important that all operators are signed up for this to be effective. Otherwise this could introduce an ulterior motive to apportioning fault between TOCs where one refunds and the other does not, thus harming the improvements needed by passengers.

Particular consideration however should be given to the fact that more significant failures could cause a much greater cost to disabled passengers. Eg. Missed ferry connections where other passengers would have made it, later calls for home carers which are charged for etc. Therefore, a policy which acknowledges that a higher compensation level may be available would help the industry to demonstrate that it understands the greater impact such issues can have on disabled people compared with ordinary delay claims.

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

A very clear assistance provision process that is publicly available will be vital to aid passenger detail in reporting issues. A passenger should still get the refund but if passengers can provide evidence from experience on the day this might aid TOC managers in their work to improve and deal with issues.

Surely at a minimum delay-repay compensation should apply for late arrival due to lack of pre-booked assistance? DPPP's at a minimum should draw all disabled passengers to this scheme even if no other improvements can be

pushed to TOCs. We would prefer to see the implementation of our suggestions stated in Q11 however. More generous refund would give greater accountability, but delay-repay would provide a useful minimum standard which maybe could be pushed in via DPPP rewrites. Additionally, ORR should enhance its statement about on-the-day assistance to quantify minimum standards (at least for larger stations) such as providing assistance on to the next service if assistance cannot be provided for the immediate service available, or within (half an) hour. This is partly because there appears to be a significant mismatch in staffing and assistance provision between different TOCs at larger stations and a system which fails with pre-booked assistance clearly has no capacity for on-the-day provision. This is vital for short-distance trips where stations have an urban or short hop network.

Chapter three – Strengthening staff training

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

Multi-TOC training events where practicable? Link this to which TOC is good, and which is 'still learning' to empower the right aspirations? Our more widely travelled members have tended to find that Stagecoach operated businesses are much more highly regarded for assistance provision.

Q14. How frequently should disabilities training take place and its content be refreshed?

Annually, as a minimum, this would provide for new skills, advice, and protocols. The opportunity for staff to select an area of specialism/interest to supplement standard items might help increase staff engagement?

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

Note: We did not have time to read this and advise.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Yes, could be ORR and/or DPTAC.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

We have asked South Yorkshire Passenger Transport Executive if they have any contacts or data in this area relating to rail - which they do not. However, it would be useful if PA/RARS captured how assistance was requested as recording this information would help operators determine the effectiveness of a service and compare against their peers.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Passengers need to know how to report good or bad experiences of turn-up-and-go travel to ORR. Having a central point to track journeys and forward praise/grumble details to the relevant TOC would seem most efficient and mean that no assumed knowledge of how the railway works is required. This is particularly relevant for long distance multi-TOC journeys where you don't know who dropped the ball if someone was lovely and helpful at the start of the journey but 3 hours later and no sign of the assistance. This always makes it difficult to travel in an emergency and the issue gets lost in terms of investigation because the TOCs/their staff see booking ahead as their only commitment rather than understanding travelling in an emergency will happen to people requiring assistance. Our suggested approach would mean that an impartial body is aware of how this is working and tracking this not only with mystery shoppers but empowering regular and occasional travellers making trips at potentially un-surveyed times to feed in a more complete picture.

We have a slight concern that RARS might inadvertently create a strict 24 hours pre-booking rule for some operators. In practise all operators operate to a "by 18:00 the day before" currently, which is much more passenger friendly. A new automated system should not cause a detrimental booking window to come in to place.

A monitoring/reporting regime would be very useful for the industry to understand what the biggest issues are, and identify any process or training needs that arise in the future. In particular if any reported issues/complaints were all fed in to a standard system by whichever TOC received a complaint them this could facilitate understanding and analysis for ORR. This could also aid inter-TOC investigation and communication. Such a system would require a document similar to the "Delay Attribution Principles and Rules"² that the industry already uses for delays in train operations. However, it would be a separate (smaller!) and specific process for monitoring and resolving assistance provision issues in an inter-TOC environment. Why not call it Passenger Assistance Failure Attribution Principles and Rules (PAFAPaR) the key feature being a standardised set of reasons to which failures can be attributed and then later analysed. This would have to be tightly coupled to the cross-industry protocol detailed earlier and a similar level of diligence to DAPaR in defining both of these would be beneficial in the long run.

2

http://delayattributionboard.co.uk/documents/dag_pdac/Delay%20Attribution%20Principles%20and%20Rules%20December%202017.pdf

It is abundantly unclear how Network Rail (NR) managed stations are monitored or measured in assistance provision. As generally large flagship stations, they require special attention and clarity for passengers in how they raise their complaint with them.

Currently there seems to be no mechanism to enable organisers of events which might have a large number of disabled people attending to warn the local station(s) about this and TOCs actually analysing demand spikes to redeploy staff and we would like to see more attention being taken in this area in how to contact TOCs and that they will act on such information rather than creating an unsustainable work-load for staff.

Additional observations made by us to the East Midlands Franchise Consultation:

- Train and refresh staff with disability awareness training and practical skills to be competent, sensitive, and effective. This could be a KPI specified by the DfT which helps pro-actively manage and raise standards and could inform all future agreements and potentially transfer best-practise improvements across TOCs.
- Monitor performance of assistance provision on their network **and view this as a KPI at senior management level. Publication of this KPI alongside punctuality statistics in national data would help give equal significance to high quality assistance provision.**
- Ensure assistance bookings entered in to Passenger Assist are accurate and reflect actual needs not merely “Luggage assistance” then that is not what the customer needs. **Surveys should ask “Were your assistance requirements accurately logged in PA/RARS?” and ask what went wrong where this was not the case.**

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

Some of our group could use a mobile app to log when a journey is taking place and the experience, if this ties in to RARS then that is even better. Please make sure the app uses large fonts from system settings and works with screen readers. The benefit of using an App is that it can be linked to a mobile number and PA account

Chapter five – Reviewing DPPPs

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

Key issues which we as a group wish to emphasise or feel are not covered for DPPPs:

- Customer assistance staff to wear hi-vis clothing to make it easier for VIPs to identify who can help.
- Commitments to guide passengers to seats who have booked this, luggage to luggage racks where assistance was requested and not allow this to be neglected. We are concerned that a potential conflict between good assistance and other commercial/regulatory pressures is on the horizon with schemes such as Delay Repay 15 and other stricter performance monitoring. We feel this must be mitigated by using DPPP minimum standards, and where necessary other documents and contracts for new Franchises.
- Commitment to pro-actively consider the impact of changes to disabled passengers and move away from complaints based improvements as this ultimately lacks dignity for people who are often already struggling. This includes ATOC/RDG developments such as the wonderful new style small print tickets where any consultation would have shown them to be unfit for Visually Impaired persons, and for staff doing inspections.
- Commitment to support and implement future RARS and any subsequent phases or refinements become necessary.
- Commitment to standardised reporting of assistance provision complaints and to using the cross-industry assistance provision protocol. We would like our concluding paragraph in Q18 to be considered carefully for how it might help ORR and the industry as a whole.
- Highlight the availability of AAT and that this does not apply only to wheelchair users.
- Highlight Delay Repay provision and that this applies to assistance that is not provided or is delayed. A higher compensation level should be instigated in the future to emphasise this.
- Highlights that TOCs should identify their highest risk stations for situations where assistance does not arrive in a timely manner for disembarkation and where injury might occur (as you can't rely on someone to do this generally in the current system). Heightened risks include large or unusual platform heights and sharply curved platforms. Ensuring a high response standard is set at such station would show proactive concern.³
- See observations in Q2 about standard initial pages for all DPPPs to reflect a summary of national minimum standards which will guide all multi-TOC trips.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

Whilst we agree with TOCs internally reviewing and confirming minor updates on an annual basis as good internal practise, we are concerned as a group that if the ORR does not maintain some form of compulsory refresh window

³ The nearest miss in terms of potential injury that one of our members has encountered was at Vauxhall station. A large drop was present between train and platform and other passengers helping did not know to advise this. Station staff were not even bothered or attempting to provide the pre-booked assistance.

then it will lose the ability to influence and roll through industry wide improvements. We would like to see local disabled user groups informed and updated about changes to a DPPP pro-actively by rail operators and consider how they might consult prior to changing working practises or commissioning new rolling stock. We understand that a yearly refresh might be excessive, but a 2-3 year cycle which will take account of mystery shop and other monitoring efforts is essential to achieve the goals of more accessible public transport. This could be linked to the staff training refresher intervals to roll updates through in an organised manner.

In addition to the above responses we feel the following background material might be of use. These points were submitted for the East Midlands Rail Franchise Consultation regarding **Sheffield station and which might reflect on other major urban station issues**

The Customer Service Desk at major stations such as Sheffield Midland should always be staffed: this is not currently always the case. If there is a particular reason that it cannot be staffed for short periods of time, then there should be an ability to 'hail' the staff that are on duty. This is particularly critical for those who have booked Customer Assistance as it is the meeting point for this.

Many disabled users have had issues with staff attitude to not booking ahead, even on local journeys which is unacceptable. A commitment to turn-up-and-go assistance particularly for these trips is vital as it is impractical to name your train if you are doing meetings around the city and there should not be extra pressure on disabled people to meet the railways mechanisms which over restrict such short distance trips. It is therefore important that the station is adequately staffed so that disabled passengers have sufficient and comparable access to other passengers.

It is also important that Customer Assistance staff to wear hi-vis clothing so they can be identified.

Customer assistance if arrive by tram (no staff there): a big yellow 'help' button was installed at the tram stop to provide access to a person to talk to, but has never been operational. Even if this facility was working it is ineffective for severely visually-impaired passengers unfamiliar with a station. National standards for tactile markings to lead to a information desk or help request button is a key development area to assist passengers to connect with customer assistance. This requires a unique tactile for information points, accompanied with directional indication tactile.

A clearer process for customer assistance is needed: currently, the passenger is required to turn up 20 mins early: s/he will then be seated by the Customer Assistant (CA) who then goes away and returns nearer the train departure time. This can cause worry to passengers who may feel they have been forgotten: there is no way to contact the Customer Assistant.

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2 February 2018

Southeasterns response to the ORR Improving Assisted Travel : a consultation dated 15 November 2017

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

As an industry we are trying to move away from printed information as we enter a digital age. We do of course appreciate there will always be some demand for printed information at source but we try and ensure this is in a downloadable format so that people can print it off at home or staff at stations can print it off for passengers on demand.

We are also looking at developing apps, like the current 'My Southeastern' journey planning app, so it is more interactive and intuitive and users will be able to plan accessible journey options as well as buy tickets and explore stations. We will obviously look to use this technology to understand users needs and so will be able to direct information to passengers in a more direct and targeted way – which would include information to people who may need assistance.

We see this as a more effective way of getting information to people rather than the blanket approach at stations, which is often through leaflet displays or posters. We do also use the Network Rail installed OIS screens in stations to display important information or changes to train times as these changing images and messages are often more effective at gaining peoples notice than static displays.

In preparation for the Thameslink changes we have used people to hand out leaflets which again can be an effective way of getting the information across to passengers and



Let's talk

especially during the last major closedown, ensured that passengers were aware of changes and made alternative arrangements. However this is an expensive and still a broadbrush approach which would not be appropriate to engage with even a sizeable minority/niche group of people.

We have produced an on line commercial that included a wheelchair user as we feel that positive reinforcements help drive the message across. We also hosted the AToC/RDG produced journey's involving a wheelchair user and travelling by train as we believe these help disabled people look again at the possibilities open to them.

Also there is the added issue, covered by a later question, where we are often trying to get the message to people who are not using the railway at the moment.

So in conclusion we would agree that more could be done to promote assisted travel but feel that alternatives to leaflets and posters need to be sought.

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

Although there is much merit in the Crystal mark for making information clear, we, as with a lot of other companies have developed our own branding through the way that we communicate with passengers and feel that having to adhere to a crystal mark will affect this branding.

Q3. What steps can be taken to increase website accessibility?

We have added accessibility onto our checklist for when we design new features. In terms of testing, we have started to engage real users to seek their feedback, and are planning to prioritise and implement their suggestions, before further usability research.

Accessibility is also always taken into consideration when adding content to the website, in design, imagery and copy. We also ask our technical support agency to provide regular accessibility reviews of the site to highlight any issues.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We currently have an active Twitter team and a number of regular disabled users who do prefer this method of communication. We use it to both broadcast news and information about our services, including that related and of interest to disabled people, but we will often use it to answer personal queries and questions from users.

We also maintain a Facebook page and use this to promote services and especially destinations on our network. As above with our web page, this is where we hope to direct users, however it isn't just about having these services available, it is about generating the traffic. Unfortunately for the rail industry, it is usually the negative that we attract and it is hard to see how there is an easy way to do this, especially when the demographic of many disabled people is that they are not generally that social media savvy, with over 40% of disabled people being over 65.



Let's talk

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Since our new site launched in November 2016, there has always been a direct link from our homepage to our accessibility information and Assisted Travel booking form.

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

The retailing of rail tickets takes place through many different channels, including online, through apps and at stations. We also have an active third party market which accounts for many online sales. Assisted travel booking should ideally be able to integrate with the journey planning and ticket purchase process, but it is also important that we bear in mind customers access our services in many different ways. Some may choose to go directly to the station and buy tickets there, having potentially booked assistance in advance. Others may wish to plan a journey online and benefit from integrated assistance booking within that process. Additionally, with new payment methods such as Oyster and Contactless pay-as-you-go in London, the ticket purchase process itself is very different for different types of journeys. No tickets have to be purchased at all with Contactless, so the booking of assistance would be very different here. Because there are various channels through which customers access our services, it is probably not beneficial to intrinsically link ticket buying to assisted travel but instead give the flexibility for this to happen if customers want it, but equally offer other choices (such as a standalone app or website) for those who prefer to book assistance that way.

This would require a functionality change on our booking engine. There are two different suppliers for these functions so it wouldn't be quick, but it is something we could explore in the future if feedback suggested passengers need this. So no doubt entirely possible for this to happen without the person needing to re-enter all their information as it will need systems to handover to each other but it is certainly more complicated than the way that airports handle such a request, which is what it is often being compared to.

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

Are we talking about NGO's, local councils or other businesses? If the former, we already do engage with them on an informal level, often going to cross industry and pan disability events to talk about our service. These can lead to a useful exchange of ideas but it has been found there is little promotion by these agencies of information to their users, to make them aware of the help available to make journey's. They are often keen to partner with ourselves but this usually involves a fee and does seem more like awareness of their brand raising and selling of services than a genuine attempt to help promote our services to their clients.

Smaller, local organisations, we also meet with on an ad hoc basis, and the need here is less money generation as it is to raise some local issues that their members find – it is always useful for us to meet with people, especially those with genuine concerns, however there is little reach beyond those directly involved with running the organisation



Let's talk

as they have little funding to reach out to the people they believe they represent (particular disability types or local areas) and often the information we share with them goes no further than the participants of the , often, small meetings we attend. This can be a lot of effort for little onward promotion of services.

Obviously we do work with local councils in our areas, however this is often on regeneration schemes that are funded through central government. There is little or no money in local councils now to support local groups and even though they have an obligation under the Equalities Act to ensure they have a considered the diversity issues of changes in their locality, there is little or no onward engagement with disability groups sponsored by councils.

As for businesses we do promote travel to local areas on our network and work with local businesses to support this but this is usually on a quid pro quo basis and even though there is a clear business case for businesses to welcome disabled people it isn't one we have found that will generate the interest of businesses.

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

No response

Q9. How might the reliability of communications be improved?

The rail industry, due to its complicated make up and relationships, and also its reliance on centrally maintained systems, can appear to be slow to embrace new technology, especially now in this fast moving , smart phone app world in which we live. Where almost weekly new platforms become available for communicating between people and organisations, the slow uptake by the rail industry , especially in comparison to more agile businesses, can seem like the railway is dragging its feet. But this complicated nature of the railway, compounded in some ways by the franchising system, which although does ensure massive investment in the railway, it can then be weighted towards the beginning of franchises, with plans for the franchise generally agreed before it begins, so when they are of 5 -8 or even 10 years in length, this can then be difficult to find the funding for new initiatives or technology , even halfway through a franchise, where the technology may not have even existed before the franchise begun.

The current Passenger Assist system , with its web access and email capability was brought into being to replace the earlier APRS system as that relied on Fax machines. But, in the last few years this has appeared out dated as smart phones and apps like Whatsapp, FB messenger , Twitter and Snap chat have taken off. To then create and introduce a new system, that will work across all train companies and Network Rail, as well as being available to passengers in their favourite format, will continue to be a challenge that is not easily solved. However RDG are currently looking at a replacement for PA and this may well then be a system that Toc's can use, because undoubtedly, at least where we have passengers making inter Toc journey's it is better to have a system that we all use or at least can easily talk to eachother.

Of course the other benefit of ensuring that the ability to communicate with train and station staff and ultimately with the passenger is available is to assist with the demand for unbooked assistance. Obviously the current system cannot do this and it is clear that this



Let's talk

is what passengers want, certainly as an option, and RDG will be ensuring that this ability is part of the new system.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Although undoubtedly there are issues for disabled people when travelling between Toc's, it isn't a lack of a suitable protocol that stops this happening, but more simply it's a breakdown by staff in following their own internal procedures when they either assist someone onto a train or receive a call/message that someone needs assistance or? The different Toc's all have different policies and procedures for good reason. Usually driven by other factors, like access to a phone, availability of staff, resources at stations, the type of service they run, contractual relationships with fellow Toc's and Network Rail etc. These procedures, although no doubt refined for how they pass messages about assistance or indeed provide that assistance, were not only created for providing assistance, and so are usually an extension to other procedures like lost property, security, performance, etc.

We don't believe it's a lack of protocol that leads to failure to provide assistance, but simply a failure to apply whatever is the established system the Toc already has. And these often reflect the different kinds of service provision each Toc has as well as the different kinds of resources available at the station, which varies greatly between stations (eg a Cat A station compared to a Cat D) as well as the different crewing arrangements on trains (Varying between multiple staff on an inter-city service to Driver Only operation (DOO))

We already have the Passenger Assist system which is already cross industry. However as the system gets used more and more and there is an expectation of delivery of the service through mobile phone apps, the issue isn't so much what it can deliver but the expectations of users that they can easily book this through their phone and make journey's at short notice, from and to, wherever it is they want to travel.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

We do already do this for journey's booked and travelled wholly with us and where the passenger has paid for a ticket. Obviously we do not refund for whole or parts of journey's where the failure occurred on another Tocs service but the assistance was booked by us and the journey involved our services as well. We also do not give refunds if the person was travelling on a 'paid for' pass like a TFL issued Freedom pass.

It is not without its complications because of these issues but we would certainly welcome a way that this was joined up amongst Toc's and Network Rail (who provide much of the assistance and should not be excluded from a compensation to the passenger scheme, even if they should refund this direct to the Toc where it is proved they failed to deliver the



Let's talk

service, as the Toc will have to refund the passenger)

However, perhaps it should wait until a robust system is in place that can verify whether assistance was actually delivered as booked, which didn't involve a lengthy and onerous investigation to establish whether it was. It is certainly much easier for Toc's to check times of trains and especially with smart ticketing, check whether a passenger travelled at a particular time, to verify delay repay claims, and this can now be done with the minimum of investigation. This should be taken into account when considering whether a compensation scheme is going to be introduced as it should also be considered that these schemes should only be introduced before a franchise begins rather than part way through one.

The ORR may also need to consider the legal implications of introducing a policy for all Toc's to make these refunds for booked assistance but presumably not unbooked assistance. That is can the distinction be made between the booked and unbooked assistance around compensation bearing in mind say the Consumer Rights Act 2015?

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

As above we do this now.

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

What it needs is some kind of standard of the type of 'modules' that should be included with in the training as it would not be appropriate to specify to each Toc exactly what training they should give and how they should deliver it, but there probably should be some level of what should be in it.

We are introducing a new fundamentals course which will be delivered to all customer facing colleagues by Passenger Services trainers. This means that all colleagues will now have one day dedicated to Assisted Travel; previously Drivers only received half a day of training.

Obviously a measurement is also needed to consider the success of the training although it could be considered that this is already collected through the monitoring the ORR does of complaints data.

Possibly an on line assessment could be hosted on the ORR's website to which both new entrants to Toc's and existing staff could be directed and this could make an actual assessment of how successful the training has been in getting across key information concerning different disabilities.

Q14. How frequently should disabilities training take place and its content be refreshed?

There should be a regular, possibly annual review of any training, to ensure that it meets the current needs of the business. There could also be a requirement to demonstrate what data the training teams regularly review to ensure that the training they deliver is meeting the needs of the business and its passengers.



Let's talk

There should be a variety of ways that refresher training is given and the ORR's monitoring of this should allow for this – whether through on line assessments/modules, briefing documents, disabled people interacting with staff at their workplaces etc.

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

As there has been little from DPTAC over the last few years that has been seen, this training guidance sounds like it could be over 10 years old – in which case it does not seem appropriate for this to be used as the measurement tool for any training. Perhaps if the ORR thinks this is needed then it should help fund this through and in cooperation with RDG, DPTAC and the Toc's/Network Rail.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Perhaps the ORR should consider an OFSTED type inspection (perhaps even done by OFSTED) process for the training being delivered, which also looks behind the training being given to assess the trainers and the impact the training has had on the delegates. We don't in this case think a kind of league table would be appropriate or particularly useful but this OFSTED ranking may help TOC's to tackle poor performance. Any inspection should also consider how disability training/awareness has been integrated into all training so that it actually becomes a fundamental aspect of any training given, which would help to ensure that it is tailored to the particular roles (eg managers, drivers, engineers, cleaners etc.)

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

We don't know of any currently collected data, beyond what the ORR collects for measuring disabled travel. However , a few years ago the NRPS data collection did include asking whether people had a disability and then some questions around assisted travel. These are not now included but perhaps a move should be made to include in the future so that some comparisons can be made across Toc's on the amount of disabled people travel on each network, how many do so either with assistance or independently and how they generally rate their experience . At least this adds no additional burden to data collection, and no additional cost, and it will then be part of something that is collected currently so it could also help with making comparisons.



Let's talk

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Perhaps looking at repeating some of the exercises already undertaken for the Pax Assist and TUAG reports which have just finished , perhaps moving to a 6 monthly review/ pulse check, and ensuring this becomes a regular activity.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

Undoubtedly , once we have an ‘assisted’ travel app that both Toc’s and passengers are using for both booked and unbooked assistance , this will help with both collecting statistics as well as a ready made tool to use for direct feedback on the assistance given. We are not really very far from introducing this ‘app’ as a system , so this kind of direct feedback should also not be very far away.

There should also be a way of capturing the feedback of disabled people who don’t use assistance , as this is undoubtedly the vast majority of disabled people using the network. For them, modern trains and upgraded stations tend to offer the additional changes they needed, like accessible toilets, lifts, priority seating , visual and aural announcements, tactile surfaces, highlighted surfaces and steps etc. so they can make independent journey’s , which must be the ultimate aim. However , unless we find a way to have a regular dialogue with this group of people (disabled people who **don’t** need assistance) we will not be engaging with them and they will literally be the silent majority of disabled people travelling .

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

We feel that the guidance should help Toc’s produce something for passengers that meets their needs rather than the wording heavy tome that it has become. There definitely needs to be some kind of customer leaflet and we would support that this is always available at staffed stations as well as on line although we feel that apart from ensuring it covers some key areas of our policy, and these should only be ‘key’ areas, that the Toc is left to decide on the way that this is delivered, eg the type of language used , the use of pictograms etc. , the size and length of the leaflet to ensure it meets the needs of its own passengers who it should know best.

We also feel that the guidance should be much more focussed on the outputs of the DPPP and less on the inputs – obviously there needs to be some guidance around what it needs to cover but it should seek to improve things during the life of the franchise so it should include commitments to action during the franchise and set out how these will be achieved.

It certainly doesn’t need to include a list of things already achieved other than to illustrate to a potential reader how these changes has made their journey easier.



Let's talk

Q21. Do you agree with our proposed approach to reviewing DPPP's?

We do feel that once the DPPP is approved for the franchise that it shouldn't be reviewed unless a Diversity Impact assessment of a proposed new product or service, being considered, identifies that the service will change for disabled people and that this then might prompt a review of the DPPP. Although the ORR need to be involved here to decide whether indeed a review is warranted.

We do not support an annual internal review of the document with this being confirmed back to the ORR as this just appears to be a tick box exercise as the Policy will not change unless a material change is proposed.

We also believe that a DPPP should reflect all the changes/ improvements that are committed to in the new franchise with dates for completion being part of the DPPP submission – this should then be checked by the ORR at the appropriate time to ensure that the proposed changes have happened.

We also believe that the name of DPPP's should also change as this is little understood by the very people who it is aimed at, which includes those people who come under the wider PRM definition , as well as elderly people. Likewise any new name should not simply be around providing assistance as the document goes way beyond that in its breadth and so the name should reflect that so people are guided to using it for information.

We also believe that the updating of information in the document should be restricted to on line versions only , however, we believe that it is simply more effective to point the enquiry on station facilities to the pages on the National Rail website, which are most likely to be correct and up to date.

Many thanks

Justin Ryan
Southeastern Railway
Accessibility and Inclusion Manager



Let's talk



OFFICE OF RAIL AND ROAD

Improving assisted travel



Questionnaire

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Thank you

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Introduction



This report is about **assisted travel** on railways.



Assisted travel is the help that disabled people can get so they can travel by rail.



This report has been written by the Office of Rail and Road.

The Office of Rail and Road is responsible for:



- Making sure the railways are safe



- Making sure the railways are fair to everyone



- Checking that the railways are run properly



This report is about how we can improve assisted travel on the railways.

We have looked at:



- How we can make sure that people know about the Assisted Travel Schemes

- How we can improve the schemes



- How we can train staff so that they know how to help people and understand about hidden disabilities

- How we can get better at checking that the Assisted Travel Schemes work well



- How can we help railway companies produce better policies for assisting people with disabilities

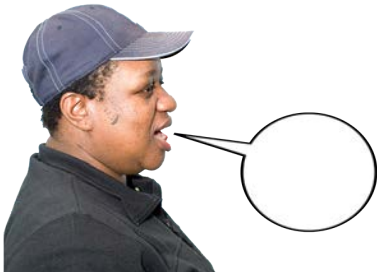


We want to know what you think.

Please read through the report and answer the questions.

Please send your answers back by 31 January 2018.

Assisted Travel



More people are wanting assisted travel. In 2016-17 people asked for assisted travel 1.2 million times.



Assisted travel is where railway staff help you with things like:

- Planning your journey
- Booking tickets
- Moving around the station
- Getting on and off your train
- Finding your seat
- Carrying luggage





Assisted travel is free and available to anyone who needs assistance due to a disability or older age. You don't need to have a railcard.

There are 2 types of assisted travel schemes:



1. Book before you travel. This is where you have made arrangements before you travel.

This is called **Passenger Assist**.



2. **Turn up and go**. This is where you have not booked assistance before you travel (even if you have booked your ticket).

Knowing about the schemes



We asked people if they had heard about the Assisted Travel Schemes.

We found that:

- 7 out of 10 people who might use **Passenger Assist** have never heard of it
- 8 out of 10 people who might use 'Turn up and Go' have never heard of it



Leaflets on assisted travel should be provided in racks at every station with staff.

These should be:

- In plain english
- Available as an easy read version



There should be posters about Assisted Travel Schemes at stations.





Question 1: How can rail companies improve the way information about assisted travel is given?

An information booklet in easy read format should be issued with each relevant railcard.
A dedicated campaign detailing who may be eligible.
Information could also be issued with benefits letters, disabled car parking badges.



Question 2: Are there any reasons why information should not be in plain English?

Some people have difficulty reading even if the information is in plain English - using pictures would help these people and also those who do not have English as their first language.

We also think that:



- Information about the Assisted Travel Schemes should be easy to find on every railway company's website



- The railway company websites should be more accessible to people who find it difficult to use or understand websites



- Railway companies should ask groups of disabled people to check that people can get the information they need



- Railway companies should make it easier to book assisted travel



- Railway companies should involve disabled people in checking that the way you book assisted travel is easy to use



- You should be offered the chance to book assistance when you buy your ticket online



Question 3: What should railway companies do to make their websites more accessible?

Use videos to explain all the options then have a simple click on picture to select service required.



Question 4: How can rail companies use **social media** to tell more people about assisted travel?

Use apps and facebook to give people more choice about how they receive the information - reading, listening to, watching a video or using sign language.

A film of someone booking assisted travel and then using it would be good, lots of people like to watch films on you tube.



Social media is new ways to share information online using apps like Facebook, Twitter or Instagram.



Question 5: Should rail companies give information about assisted travel with one click from their website's home page?

Yes, one click is much more straightforward.



Question 6: Should people be able to book assisted travel at the same time that they book their ticket?

Yes, it would make them feel more confident about their journey and they could print out a confirmation.

We also think that:



- Rail companies should put information about assisted travel in places like:

- Doctor's surgeries



- Shops



- Local support groups



- Pharmacies



- Rail companies should work more closely with organisations that work with disabled people



Question 7: How can rail companies make more people aware about Assisted Travel Schemes?

Television campaigns.
Radio campaigns
Advocacy groups



Question 8: How can rail companies work more closely with organisations that work with disabled people?

Attend travel network meetings.
Offer information sessions to self-advocacy groups.
Give groups of disabled people an opportunity to have a trial experience of assisted travel.
Have disabled representatives act as advisors to the rail companies.
Have a presence at conferences for disabled people
Work with disabled drama groups to produce information film.

Improving the schemes



We talked to lots of people who booked their assistance in advance using **Passenger Assist**.



We also asked people to test the **Turn Up and Go** scheme and to tell us how they found them.



Most people said they were either satisfied or very satisfied with the way the schemes work.



But one in five people said that they did not get all the assistance they booked.

One in eight people did not get any of the assistance they had booked.



People had problems with:

- Staff turning up late



- Information about the passenger who needed help not being passed on from one station to the next



- Some railway companies performing better than others



- Getting off the train. One in five people who asked for help getting off the train did not receive it.



Question 9: How might we improve the way information is passed from one station to another?

Have a team at each station responsible for assisted travel so someone is always available to help. Information should be passed orally, then checked that it has been understood. Relying on e-mails and answer phone messages isn't efficient.



Question 10: Would new rules for rail companies make the service better passengers who need the Assisted Travel Schemes?

Yes.



What should happen when Assisted Travel Schemes don't work?

We thought about how the passenger should get compensation when Assisted Travel Schemes don't work.



Question 11: Should rail companies refund the cost of the journey if assistance does not work properly?

Yes



Question 12: Should rail companies write their own policies for giving passengers compensation when Assisted Travel Schemes don't work?

No, it should be the same policy for compensation for all the rail companies.

Staff training



Most people say that the staff who assist people were very good.



But staff do not always find people with hidden disabilities.



Occasionally, staff are not always as helpful as they could be and get annoyed with people asking for assistance.



Different railway companies give different amounts of training to their staff.



Question 13: How can different railway companies give the same good training to their staff?

The different railway companies should use the same training information and this should have contributions from a wide variety of people across a wide range of disabilities.



Question 14: How often should disabilities training take place?

Two or three times a year as a refresher course and discussed during staff supervisions.



Question 15: Should there be rules about including disabilities training in staff training programmes?

Yes, all staff at the station should be trained - this would include cleaners and shop assistants as they can be seen as more approachable.



Question 16: Should there be agreed standards of disability training for railway staff?

Yes

Better checking



We want railway companies to get better at checking that their Assisted Travel Schemes are working properly.

We think that railway companies should:



- Include more information about accessibility when they collect information about complaints



- Check that the right staff training takes place



- Provide more information about how the Assisted Travel Schemes are working



Question 17: What information should be collected about how the Assisted Travel Schemes are working?

The experiences of the disabled passenger and that of their carer or family if they have also travelled.
Ease of access to book the assisted travel.
How they were spoken to upon booking and during the journey.
Were they made to feel equal or different.
Was the assistance waiting for them and did the assistance have the correct information.



Question 18: How should we get better at checking that Assisted Travel Schemes are working well?

Random follow ups with customers.
Have surveys available at stations and on trains - including easy read format and provide pre-paid envelopes.
Have regional focus groups.



Question 19: Are there any ways that we could use new computer systems to check how Assisted Travel Schemes are working?

Have an app where people could report on their journey as it happens.

Disabled People's Protection Policy



A Disabled People's Protection Policy is a plan about how a rail company should make sure that disabled people can use their railway safely.



Each railway company has to write a Disabled People's Protection Policy and make it available to its customers.



The Office of Rail and Road has to check each company's Disabled People's Protection Policy.



We are thinking about the best way to help rail companies write their policies, so that they provide a better service and people understand what is on offer.



We will take account of the ideas that come from people answering the questions in this document.

Thank you



Thank you for your ideas.



Please now post your answers back to:

**Consumer Policy Team
2nd Floor
Office of Rail and Road
One Kemble Street
London
WC2B 4AN**



or email them to:

DPPP@orr.gsi.gov.uk



Please send them back by:

31 January 2018

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Improving Assisted Travel ORR Consultation Response

Improving Assisted Travel ORR Consultation Response



TransPennine Express (TPE) welcomes the opportunity to respond to this consultation by the ORR, and is passionate about working collaboratively to improve the assisted travel service to enable more customers to access the rail network.

As a member of the Rail Delivery Group (RDG), we are supportive of the response submitted by them on behalf of all Train Operating Companies (TOCs), but are providing additional responses.

The findings of the research conducted by the ORR tell a clear story of the significant untapped demand for rail by older and disabled customers who may not be aware of the assistance which is available to them.

It also shows that the main failing in the current service offering is the reliability of staff being available to provide the assistance, which can often be as a result of communication issues between the system and the member of staff, or through the system being oversubscribed at the time when the customer is making their journey, seeing the responsibility for multiple assistance bookings on one train falling to a single member of staff.

With this in mind, it is our belief that priority should be given to ensuring that the system supporting the service is fit for purpose and can cope with increased demand, and clearly communicates to customers the levels of assistance available at a station at a given time, so as to set their expectations.

We hope that the ORR finds the responses made by TransPennine Express within this consultation of use, and considers the suggestions which have been made for improvements to the current systems and methods of working. We would welcome further discussion with the ORR on all subject areas where comments have been made, and hope to work closely on the implementation of the resulting changes within this area of the rail industry.

Chapter One

Raising passenger awareness

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

In line with the requirements of the DPPP guidance, printed versions of our Making Rail Accessible: Helping Older and Disabled Customers document is available in all staffed stations where our services call. These are presented in the leaflet racks at the stations, often within the booking office.

We agree, opportunities exist to promote the Assisted Travel service, however we would question whether the station is the correct location for this activity. We feel more emphasis should be placed on informing customers of the assistance which is available to them before they commence their journey. We see the step free route maps which are currently produced by some TOCs as a good example of this, and would like to see a national step free access map produced.

The introduction of 'how to book assistance' leaflets, which extract key information from the DPPP, or links on booking confirmation emails would also help with raising awareness of the Assistance service. These leaflets could also be sent to any customers receiving a Disabled Persons or Senior Railcard. TOCs could also distribute these when tickets are purchased in advance via the Booking Office, however care should be taken in this case as some customers may interpret this as the station team inadvertently commenting upon their abilities.

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

We would be supportive of introducing the requirement to achieve Crystal Mark Standard or a similar accreditation for DPPPs, however we feel that the current imposed structure of the document is a hindrance to achieving any such standard.

We would be supportive of the ORR seeking to review the requirements set out in the DPPP guidance, paying particular attention to its structure to determine whether a single document is the correct approach. We would like to see consideration given to a leaflet specifically focusing upon 'how to book assistance'.

We would be happy to be involved in discussions around changes to the structure, and any trials which may result from this.

Q3. What steps can be taken to increase website accessibility?

Great strides have been taken to improve the accessibility of TPEs website in recent months, and the commitment to have accessibility information available via a link from the homepage aids the navigation (this is detailed further in response to Question 5). We also recognise that website tools such as Recite Me offer increased levels of accessibility through various functions, however we do not feel that it would be appropriate for a single provider to be stipulated for all TOCs to adopt.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

We are seeing an increasing trend in customers with disabilities making use of our social media feeds to communicate their needs and seek advice, guidance and assistance whilst travelling on our services.

We are supportive of this trend, and feel that it provides an opportunity to provide a greater level of real-time response and engage in dialogue with customers.

Promoting the assisted travel service through social media channels would undoubtedly have a benefit, however we feel a targeted and coordinated campaign, as suggested by RDG, would prove more effective than a TOC by TOC approach.

We also recognise the approach of some groups in London who make use of specific social media accounts to communicate the status of accessibility features. This could be considered on a larger scale, again with the greatest impact coming through a joined up approach.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

TPEs website currently offers a link to 'Assisted Travel' from a drop-down menu on the homepage, under the tab 'travelling with us'. We feel this is a logical route to finding this information.

We would be supportive of introducing consistent terminology with regards information about assistance for customers. Our website and DPPP use the term 'Assisted Travel', where other TOCs have branded their assistance service and use alternative terminology such as 'Journey Care'. To help with the raising of awareness and a consistent understanding, we would be supportive of a common term being defined.

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

TPE are extremely supportive of RDGs work on Passenger Assist which should allow it to integrate with ticket purchasing systems. Currently the Passenger Assist system acts as a barrier to TOCs offering this joined up service.

The current approach whereby customers requiring assistance cannot specify this at the time of purchasing their tickets creates issues, which can often affect the consistency of the assistance service at delivery stage.

This segregated process also acts as a barrier, with the customer essentially completing two transactions with the TOC, one for purchase, and one for assistance. Whilst tickets can be purchased at the time of booking assistance through telesales, an online alternative would be greatly received by customers.

An improved link between the ticket purchase system and the assisted travel system would carry many benefits:

- **Improved awareness and usage of Priority Seating**

Priority seating is obvious when on board the train, but many infrequent rail users may not be aware of its existence, and the benefits it may offer them. By requesting assistance as part of the ticket purchasing process, priority seats could be booked in advance without the need for additional phone calls or requests.

- **Standard Class vs First Class Tickets**

There are a number of operators whose trains either do not have first class saloons, or these saloons are not accessible by wheelchair users. Linking the assisted travel system to the ticket purchase system could present the opportunity to remove the potential for customers to purchase a class of ticket which they cannot use.

- **Time Savings**

Call waiting times when booking assistance are minimal, however the total time taken to make a booking can be significant, especially where they may be multiple journey legs. Much of the time on the call is spent relaying to the advisor which services the customer is travelling on, and so linking the two systems would remove this duplicative activity.

- **Booking Notice Periods**

Currently, customers requesting assistance are advised to book this in advance of travel. Many will not book assistance at the same time as purchasing the ticket, and will wait to book closer to their date of travel. Combining the processes would see assistance being booked earlier in many cases, or, where a train is already fully booked, customers can select an alternative train without the need for tickets to be altered.

It should also be considered that linking the assistance booking process with the ticket purchase process delivers numerous benefits, it also presents a potential issue.

Placing this process online may see some customers booking assistance who may have mistaken it for a porter service, or see the ability to book the wheelchair user space as an opportunity to reserve this for excess luggage, pushchairs or other items. Consideration should be given as to how this could be managed to avoid misuse or conflict.

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

As with the approach to social media, a coordinated campaign to raise awareness of assisted travel would carry greater benefits than a TOC by TOC approach, however we recognise the benefits of establishing links with key local organisations to make potential users aware of any specific access features relevant to the TOCs and stations operating in their area. This would have particular benefit where a station is inaccessible, or specific policies apply, such as scooter carriage.

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

We actively engage with key accessibility groups in our region to promote our services, and discuss the accessibility of our stations and services. We also hold a Joint Inclusivity Forum with Arriva Rail Northern and Hull Trains, attended by key customers and representatives of disability organisations where we discuss issues and test our approach to ensure any changes we are making cater for the needs of disabled customers.

Chapter Two

User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

TransPennine Express are one of a number of TOCs who have adopted the use of the PA Staff app as a means of communicating booked assistance to our station teams. This adoption of this app allows TransPennine Express to offer customers the option to book assistance with a reduced period of notice.

Whilst this app is a step forward from the email/print-out based approach previously used to communicate assistance bookings to the station teams, it is still not fit for purpose, with several features lacking. We are working with RDG to ensure that any new system meets the needs of both customers and staff to create a seamless and reliable system for communicating assistance bookings.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

The issues experienced with the current Passenger Assistance system are deep rooted, and cannot be overcome through manual interventions without significant additional resources being deployed at stations.

TPE has identified a number of improvements which could be made to the current system which would assist us in the delivery of a reliable assistance service, and these have been proposed to RDG, however it is our understanding that due to the current position of the Northgate contract, these changes will not be made, and instead will be considered within the scope of the replacement system.

An operational change which could be considered as a cross industry protocol is the approach to seat reservations, whereby any customers booking passenger assistance who is not a wheelchair user, must be provided with a priority seat reservation. This would enable staff to more readily identify those customers needing assistance when the train arrives.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

TPE already commit to refunding customers where booked assistance has not been provided. We would welcome other TOCs adopting this stance.

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

TPE would be supportive of a consistent redress policy being adopted across the industry.

Chapter Three Strengthening staff training

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

Two types of training are required in this area. TPE distinguishes between the practical elements of assisting disabled customers, such as how to use a ramp, and the softer elements of how best to meet the needs of a disabled customer, through disability awareness training.

Through working in collaboration with various charities, TransPennine Express has delivered a comprehensive Disability Awareness Training Course to all customer facing staff. This was well received, and the approach taken involved E-Learning modules, experiential learning, and classroom based activities, looking at:

- The attitudes of society towards disabled people, and the prejudices they face
- Recognising hidden disabilities
- Assistance for blind and partially sighted customers
- Assistance for deaf and hard of hearing customers
- How to effectively communicate with disabled customers to best understand their needs and how staff can be of assistance

The structure of the course allowed the trainers to be reactive to the attitudes of the attendees, and for staff members to share their personal experiences of assisting customers with disabilities, and effectively communicated our responsibilities as an operator.

Whilst a level of consistency across the industry in the area of disability awareness is essential, the ability to tailor training so it is aligned to the services offered, the nuances of operations and facilities, and the experiences of the staff attending the course is essential.

An approach whereby specific topics and activities are identified, but where the TOC has control over how these are delivered offers the best approach.

The practical training elements of 'how to assist' are encompassed during induction through station familiarisation training, and offer the best opportunity for hands on training through a train-the-trainer approach.

An area which is being explored is the opportunity to extend disability awareness training beyond customer facing staff, to embed a greater understanding of how decisions elsewhere in the business can impact on the experience for disabled customers using our services.

TransPennine Express believe there is merit in sharing best practice from TOCs approaches to disability awareness training, so as to drive continuous improvement throughout the industry, and would be happy to share the course content and approach with other TOCs, subject to approval by the charities involved in the development of the course.

Q14. How frequently should disabilities training take place and its content be refreshed?

Practical training is refreshed wherever an operational change requires, or where there is evidence that the member of staff is not following the procedures set out, e.g. safe use of the ramp.

Disability awareness training is delivered to all new starters with the business, and as such at any one time, 100% of TPE customer facing staff have received disability awareness training.

We do not feel it is necessary to repeat this training at a frequency greater than once per franchise term unless there are material changes to legislation.

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

Where disability training is committed to within a franchise, the DfT could require TOCs to have the content of the course verified by DPTAC, or could indeed mandate adherence to the DPTAC training framework, however the response to Question 13 should also be considered.

Given the significant investment made by TPE to train all frontline staff in disability awareness since the launch of the new Franchise in April 2016, we would not expect any revised guidance to be implemented as part of the current franchise.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

See response to Question 15.

Chapter Four Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

From Rail Period 5 of 2017, some TOCs began to gather data to demonstrate their ability to deliver against the key indicators set out by the ORR.

The complexities associated with collecting this data, and the demand this places on the frontline teams within the business were communicated to the ORR by TOCs through the Rail Delivery Group, and we understand that some TOCs have since confirmed that they are unable to supply the requested data. We feel that the ORR still do not fully understand the difficulties experienced whilst trying to collect this data.

Nonetheless, to date, the data which has been captured by TransPennine Express has been shared with the ORR, supported by commentary explaining the flaws in the accuracy of this data. This is due to the manual process which has been undertaken in pursuit of this data, which leaves room for human error, in a busy operational environment where safe operations and providing help and support to customers takes precedent.

Given the inaccuracies within the data TPE has been able to collect, we would question the sustainability of this method, and are appreciative of plans which the ORR has to hold an industry workshop to share best practice on data collection methods, however we feel that workshops regarding the method of data collection should have been held prior to the commencement of perioding in Period 5.

Moving forward, once a sustainable method for data collection which can be applied to all TOCs has been developed and embedded, an area which the ORR could seek to explore further is the monitoring of the reliability of accessible features at stations and on trains. Monitoring the number of instances whereby a lift is out of order, or the number of services where the universal toilet is locked out of use may provide greater insight to the ORR, and highlight where issues with assisted travel may occur.

Q18. [Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?](#)

No further suggestions.

Q19. [Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?](#)

The replacement of Passenger Assist with a new system affords an opportunity to improve the service and data available around assisted travel.

The current system has fixed reports, which do not offer the ability to interrogate the data to the levels we would like. For example, it is not currently possible to view the quantity of assistance bookings by train over a period of time, so TOCs do not have sight of which trains are carrying the most disabled customers, and as such, cannot effectively deploy resources in anticipation of this demand.

Discussions between the ORR and RDG could prove beneficial in setting out the reporting requirements of the new system.

The ORR could seek to adopt best practice from other industries, looking at how similar monitoring is conducted in similar operations, and also invest in systems which would allow for fast and effective reporting to take place, with manual processes being removed wherever possible.

Chapter Five Reviewing DPPP's

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

TPE are supportive of the ORR updating the DPPP guidance. In particular we are appreciative of the plans to update the terminology within the document to reflect the changes within law and wider society, and include details about new trends including social media.

We would like to see the ORR make several other changes to the guidance, which we feel would greatly benefit customers who refer to the DPPP for information about accessing services and gaining assistance during their journey.

The current guidance sets out a prescriptive structure for the DPPP to follow. This structure ensures consistency across all TOCs, but we feel that the current structure forces high levels of repetition within the document which could be avoided, therefore making the customer facing documents shorter and more accessible.

In addition to this, we would wish to see the ORR consider the removal of the station matrix. Through station investment and operational changes, this information can quickly become outdated. It is also particularly difficult to ensure that data relating to other TOCs stations is maintained and accurate. Replacing this matrix with information about where to find out about station facilities, including an option to request printed information about station facilities could be considered as an alternative solution.

We have also found during the review process of our pending DPPP, that the ORR require set terminology to be adopted by the TOCs, but this is omitted from the guidance document. TransPennine Express would be supportive of the guidance document transitioning into a framework from which TOCs can then add the specific details about their services. This would reduce the amount of time required for review, and introduce further consistency across all TOCs.

Q21. Do you agree with our proposed approach to reviewing DPPP's?

TransPennine Express appreciates that the current review process for DPPP's is intensive, and limits the ORR's ability to focus on other activities, however, we wish to raise a number of concerns regarding the proposed approach, and seek clarity on these points.

We appreciate the need for the ORR to review and approve material changes, however guidance should make clear the parameters of what is defined as a material change, as interpretation of guidelines could result in a situation where the ORR deems a change to be material, and the TOC does not. We would also request that the guidance provides details of a resolution process for when these situations occur.

As a new franchise, we are investing heavily in our stations, and making significant changes to our services, including the introduction of an intermediate fleet, followed by three brand new fleets of trains in quick succession, each of which presents a change from our current operation, with new routes also being introduced. Each stage of this activity could be construed as a material change. The proposed approach to reviewing DPPP's would require TransPennine Express to submit a revised DPPP for review prior to the introduction of each new fleet of trains, and each timetable change, ultimately requiring the ORR to review our DPPP up to five times within a 12-month period.

With this in mind, we would question whether this approach is sustainable for both the TOCs and the ORR, or whether an alternative method could be employed, whereby DPPP's can be

constructed in such a way as to provide upfront details of what changes are anticipated within a 12-month period, followed by supplementary information to be provided through an alternative document or format to allow specific changes to be communicated more effectively and timely.

If the ORR feel that this is not a suitable approach, we would ask for the guidance to include a commitment from the ORR regarding timescales for review and approval to ensure that revised documents are in place in anticipation of service changes.

Moving away from the concerns relating to material changes, we support the proposal for the ORRs 'right to review', but would request that the ORR sets out within the guidance a clear timeline which would be followed, including a notice period for review, so that the TOC can actively manage the workloads of those involved in the review process. The guidance should also set out a minimum and maximum frequency at which each TOC will be selected for review.



**Response to the
Office of Rail and Road's November 2017 consultation
on
Improving Assisted Travel
January 2018**

Introduction

Transport Focus is the independent consumer watchdog for Britain's rail passengers; for bus, coach and tram passengers in England (outside London); and for users of England's motorways and major 'A' roads (the Strategic Road Network). We aim to make a difference in various ways, but always with the user at the heart of our work.

We strive to give all transport users as powerful a voice as those that provide their services. We do this through gathering evidence of the user experience and presenting it to those who can make a difference, whether from the industry or government. We undertake the National Rail Passenger Survey ([NRPS](#)), the Bus Passenger Survey ([BPS](#)) and the Tram Passenger Survey ([TPS](#)) and have used the results of these to drill down further for additional information on disabled passengers' views. We undertake other research and our response is based on the evidence gathered over a number of years, through research and other direct feedback from users, including our postbag, and from our own experience of using the railway. The compiler of this response has impaired mobility and is a frequent user of the assistance system and thus has first-hand practical experience of many facets of the system.

We welcome the opportunity to respond to this ORR consultation. We believe that despite infrastructure and on-train facility improvements over the last two decades, the level of the assistance-provision service has failed to register such a significant improvement over the same period. Transport Focus's predecessor bodies undertook a series of mystery-shop surveys over a number of years to assess the efficiency of passenger assistance. We have noted some improvements during the course of these, but it seems from ORR's own research that several aspects of assistance still stubbornly refuse to improve significantly. We trust that the outcome of this consultation will contribute to resolving such issues.

Transport Focus, and its predecessors, has a role in reviewing each operator's proposed Disabled People's Protection Policy (DPPP) and in reporting its views on the conformity of the document to ORR.

We work with the Department for Transport in various areas concerning accessibility matters, including the content of new franchise awards.

We also run a twice-yearly accessibility forum which brings together the rail and bus industries, road user organisations and disability representative bodies and individuals to consider matters of mutual interest in the transport sphere.

Responses to the consultation questions

1. How can rail operators improve the availability and promotion of Assisted Travel information at stations?

Poster sites at prominent points on stations and other areas of railway property would no doubt be the most helpful areas to exploit, though demand for such positions for other publicity needs for various types of passenger information (engineering work timetable changes, Railcard promotions etc.) means that such spaces can be at a premium. Racked leaflets, distinct from the DPPP, may be another option. Announcements are probably not a helpful means as this medium is already heavily used for train information, security warnings, disruption details and so on. CIS information screens (though not those used for departure information) might also be exploited for this purpose. At stations, staff could actively offer a leaflet to likely beneficiaries when they are seen on the station or when renewing a Senior Railcard for instance.

It seems that too little advantage is taken of other methods to advise passengers before they reach the station. Details could be sent with new issues of Disabled Persons Railcards or with postal issues of Senior Railcards. More imaginative use could be made of the Railcards websites and operators' own websites could brand assistance in a more prominent and uniform manner.

Social media offer another immediate outlet.

The extent to which the industry has sought to engage with disability representative organisations in the past is unclear. Liaison with them may enable details to be included in those organisations' newsletters and other publications and on their websites. Partnering with these organisations provides a real opportunity to widen awareness of assisted travel.

2. Are there any reasons why passenger-facing documents should not be required to achieve the Crystal mark?

It would be a major benefit if all such documents *did* achieve the Crystal Mark. However, rendering them into Plain English (and Plain Welsh, where appropriate) must not obscure the meaning of any specific terms relating to

assistance schemes. Particular care must be given to ensuring that jargon can be overcome but that the intended meaning remains clear. It will also serve to ensure that train companies' policies are made much more obvious to readers, which is not always the case at present.

Such rendition needs to be made before drafts are submitted to ORR and beyond for comment. However, allowing for the possibility of misinterpretation, any changes would need to be 'translated' and referred back for checking for accuracy.

3. What steps can be taken to increase website accessibility?

Transport Focus is not best placed to comment on how this might be achieved. Initially, however, advice from users on their needs must be obtained.

The current DPPP Guidance sets a minimum level of accessibility. The rapid advancement of technology requires the Guidance to be as up to date as possible with realistic targets for operators to achieve.

Clarity is vital if passengers are not to be confused, especially where bookings are concerned. Display of fares information varies from one operator's website to another and can be misleading. Not all websites it seems use the same algorithms and thus different fares for identical journeys can be generated by some systems, which is a source of nuisance and incomprehension for all passengers, not only those with a disability.

Whichever format is adopted, it is important that the website can reproduce its contents in speech by conventional reading machines for visually-impaired people.

The Guidance currently specifies a certain level of website accessibility, especially for those with visual impairment. It is probable that this needs revision to match current standards.

4. How can rail operators use social media to increase awareness of Assisted Travel?

Many passengers 'follow' one operator or more on Twitter as it gives them access to live information on disruption. A more concerted effort to promote awareness of Assisted Travel with periodic tweets such as 'Did you know that you can book travel assistance for yourself or someone you know who needs it? Follow this link for details...' is appropriate.

A similar campaign could exist on other social media (e.g. Facebook). Hopefully, even if those who could make use of Assisted Travel do not see these messages on social media, friends or family may, which in turn would raise general awareness.

On a related issue, we suggest that an addition be made to the National Rail app for Assisted Travel, so that a passenger seeking to make a journey could find a link to the correct Assisted Travel contact information for the appropriate operator(s) and/or a brief explanation of what is available.

5. Are there any obstacles to providing Assisted Travel information no more than “one click” from rail operators’ website home pages?

The greatest obstacle it seems is persuading operators that it would be helpful if they would indicate access to assistance details in the same place on all websites and that the layout is capable of ensuring that accessibility details for that operator can be reached by a single click. Desk research undertaken on 4th December 2017 established that all train operators’ websites (franchises, Merseyrail, TfL, London Overground) are all reachable in at least two clicks except for two (both franchisees) which require three clicks.

If operators can ensure that ticket purchase pages can be reached by only one click, the technology must be identical to reach the assistance pages. (Perhaps if ticket sales and assistance booking can be co-ordinated, as discussed elsewhere in this paper, the problem is largely resolved, although not all those booking assistance need to buy a ticket.)

In a number of cases, though, the ‘one click away’ problem is not the only issue which needs resolving. Regardless of the number of clicks involved, it is important that operators make clear where to click to reach the access details and assistance-booking service. The introduction of a clear (and uncontroversial) logo for assistance details might help. Currently clarity is hindered by the range of different titles used by operators and behind which assistance details are available: ‘Journeycare’, ‘Assisted Travel’, ‘Help & Contact’, ‘The Experience’ and so on. Perhaps ORR/RDG could recommend, or even insist upon, a single term to indicate where details about accessibility and assistance can be found and a single location on the homepage where the suitably-evident button to reach it is placed.

In a related matter, some of the online assistance booking pages are less helpful and easier to use than others. The fact that companies have adopted their own layout and order adds to the confusion to passengers familiar with other operators’ sites. We accept that not all operators offer the same facilities, but the booking procedure is common to all. Again, perhaps ORR/RDG could investigate/suggest a standardised version which all operators might offer – though some would need to omit certain elements which are not relevant to their services. Many operators’ website forms are poorly arranged for journeys that do not involve just one train by a single operator but where a change of train is necessary.

6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

Transport Focus believes that ticket-buying could well be linked to assistance booking to ensure that the passenger gets the best deal with the least effort, especially where Advance tickets are concerned. It is relatively simply to arrange assistance separately if an ambulant passenger has bought an Advance ticket – though it means another often long-winded transaction. In the case of a wheelchair user, however, the wheelchair space(s) on the chosen train may already be allocated so the problem of trying to amend an Advance booking is involved. This, in theory, requires the payment of a fee in addition to any difference in fare if dearer than that already bought. Most passengers would prefer only one transaction in any case.

If a train company already maintains its own telesales facility and ticket website it is difficult to see the barriers that would prevent this ‘one-stop shop’ facility from being implemented. For ease, it would appear that bringing the retail facility to the assistance-booking side would solve the problem most simply.

Bringing together ticket retailing and assistance booking should make it easier for staff and passengers to ensure that the most suitable ticket is issued for the journey. It will, however, require a major training programme to be undertaken for retailing staff if all are to be able to handle such transactions accurately and professionally; total knowledge of accessibility needs and service provision is necessary. It would be a retrograde step, however, if passengers experience extended waits solely to book assistance if this option is adopted.

More complicated would be the linking of third-party sales outlets with assistance bookings. This is covered under Question 7.

It is not the intention, we trust, to *require* that tickets be bought as part of every assistance booking.

7. How can rail operators improve the availability and promotion of Assisted Travel information to third-party agencies?

An overall arrangement with RDG, perhaps as part of their licensing requirement, rather than ad hoc arrangements with individual train companies, is the most constructive way forward and ensures a standard approach.

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

This is principally an area to which only operators and RDG can respond.

As third-party organisations require a licence issued by RDG to enter the ticket-retailing trade, scope exists within the wording of those contracts to ensure productive engagement.

There is value in third-party websites having similar one-click layout/access as mentioned in Q5 above.

Transport Focus has an interest that this is a vital matter to ensure that disabled passengers' needs are met.

9. How might the reliability of communication be improved?

Many different lines of communication are involved in a journey using assisted travel and each is a vital link in ensuring successful delivery of that assistance. The reliability of each stage has to be assured for the system to function properly.

At least three directions of communication are involved here:

- passenger with the operator when making a booking
- company to itself and/or to another company
- company back to passenger when booked arrangements have altered, due to service revision/breakdown etc.

The last of these three is the one which it appears is least observed and the one which can have a profound effect on the success of the journey; the passenger encounters an unforeseen hurdle during the journey.

Not all links in this chain are immediately consecutive:

- (a) Ensure that the details in DPPPs, on websites etc. relating to assistance provision and booking arrangements are clearly understandable and easily available to all who may need them.
- (b) The physical ability of the passenger to telephone or complete online forms to book the exact assistance that he needs.
- (c) For booking staff to record this accurately.
- (d) For the details of the booked assistance to be confirmed and sent to the passengers by text, email, post etc.
- (e) For this information to be passed to staff at the staffed stations involved.
- (f) For the correct information to be taken by staff at the starting station and supplied to staff meeting the passenger at the destination station.
- (g) Repeat (f) for every change of train
- (h) Call the passenger if subsequent changes to the train services vitiate any part of the assistance already booked
- (i) Contact the passenger after the journey for feedback.

It was our understanding at the time that Passenger Assist was introduced that all front-line assistance staff would be issued with hand-held devices for instant communication. It seems that this has not necessarily evolved in this way. In many cases, staff are still reliant on the telephone or on printed sheets produced much earlier in the day and which fail to carry details of later bookings.

It would be helpful if ORR could ascertain that all operators employ a means of instant check-back when assistance has failed, to investigate where the chain of communication broke down as quickly as possible. Staff at stations where

booked passengers alight often claim not to have received the message despite the passenger being present when the staff at the boarding station made the call. This often appears to be more complex where multiple operators are involved in a journey. Seamless inter-operator communication is vital as is contacting passengers to rearrange assistance when disruption occurs.

10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

It was our understanding that Passenger Assist is provided in largely the same way across the entire rail industry, regardless of train and station operator, within the limits set out in each operator's DPPP. It is unclear what additional 'protocol' is envisaged.

Improvements which we should recommend include:

- RDG and individual operators need to impress upon on-train staff the need to move about the entire train to make themselves known to disabled passengers and assist as the DPPP promises that they will.
- On-train staff should have details of disabled passengers with booked assistance on that service and the accommodation reserved for them, where appropriate.
- On-train staff should also confirm with the alighting station the passengers' location aboard the train and be on hand to assist with alighting if necessary. (On too many journeys, especially on intercity routes, members of staff rarely appear in standard-class passenger saloons. Too many failures to detrain passengers at intermediate stations occur.)

RDG and Network Rail will be required to work together in this leadership role, given the increasing numbers of passengers at Network Rail stations requiring assistance.

11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

We welcome the fact that some train operators already do so and thus best practice has already been established. It seems that other operators should follow suit.

Our experience is that passengers prefer a smooth and uneventful journey to receiving compensation, but where failures occur, this needs to be compensated for. Where assistance failures delay passengers they should qualify not only for Delay Repay but also ticket refunds. It is much more difficult to establish a fixed regime of entitlement in the case of assistance failure compared with clear-cut delay compensation as assistance failure will affect passengers differently. While perhaps a minimum level should apply, a good deal of flexibility should also apply to ensure that any more serious failures are

compensated for appropriately. Any scheme must balance the level of assistance failure and it should always be possible for ex-gratia payments for serious cases.

In saying this we are mindful that consumer protection regulation does give passengers 'rights' in this area. If services are not provided with due care and skill and if a passenger has based his decision to travel on information provided (such as the provision of assistance), then failure to deliver could open the operator up to a claim for redress. There is value in the industry pre-empting the need to bring a civil action by providing an industry-wide scheme of its own.

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

Currently redress policy is dealt with by each train company individually, with a varied result: some offer it for assistance failure, whether other delay occurs or not, while the remainder does not. As a result, some passengers benefit far more than others and some have no redress at all for identical incidents. We feel that this is unacceptable, given the lengths to which passengers have gone to advise operators of their journey plans. Given that Delay Repay has largely been standardised now, following its disintegration from the standardised BR norm, passengers find it bewildering that operator X can provide nothing at all when booked assistance fails whereas operator Y gives up to a full refund.

It would be counterproductive to some passengers to thwart potentially better provision by some more progressive organisations were a rigid system imposed. The creation of a basis of minimum standards would at least guarantee a certain level of payment, as in the case of Delay Repay.

It may be that RDG/DfT/ORR will need to negotiate terms with train and rail-service companies to ensure standardisation. Any such scheme will have to include all operators. Network Rail will need to feature prominently as a participant in this scheme given the very high number of journeys to, from and via its stations (although we accept that train-company staff undertake assistance duties at some of them).

13. How can consistency in training for company staff across the industry on disabilities be achieved?

All operators' training needs to concentrate on several major aspects:

- assisting passengers with hidden disabilities and ensuring that staff recognise such conditions, especially those with cognitive impairment
- ensuring that organisations representing disabled people feature in the training which staff receive
- special attention to be given to those members of staff who deal with passengers face-to-face or by telephone.

It is important for all operators to ensure that not only induction courses are provided, but also refresher training at frequent intervals.

The only organisation with cross-industry reference in this matter is ORR so it would fall to ORR to specify minimum standards and frequencies which could then be reflected in franchise specifications issued by the relevant authorities. Special notice needs to be taken of the detail submitted by operators in their annual returns of training. Reporting obligations will almost certainly require revision following this consultation.

14. How frequently should disabilities training take place and its content be refreshed?

All new entrants should receive the level of training suitable for that role upon joining the company and at frequent intervals thereafter, especially if their roles change. It seems to us that at least an annual review is necessary, although this may take place after a shorter interval if it appears that staff members are unaware of certain aspects of their role or where significant change in procedure will take place. Training content should be kept under constant review, so as to reflect amendments to company policy, changes to achieve best practice, other amendments due to revised legislation etc.

Best practice ensures that all staff receive some accessibility-awareness training, relevant to their role. Staff dealing with passengers (face-to-face, over the telephone, in writing etc.) will require considerably higher levels of skills. Stations staff will require specific training in access matters.

15. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

It seems sensible for the DPTAC training framework to play a major role here. Whether mandatory or simply recommended is perhaps a matter for ORR to decide. If it were made mandatory, the framework would need constant review to ensure that it remains valid, in line with our response to Q14. If mandatory, checking each operator's performance would be simplified. We welcome the recent consultation by DfT in which the framework was promoted and also the recognition that it may need updating.

16. Is there a role for annual independent verification of the quality of training? If so, who could do this: ORR/DPTAC/another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

It may be difficult to verify the quality of training if operators have differing courses. The wider the divergence the harder it becomes to compare. Some companies, it seems to us, offer better assistance than others which begs the question as to the cause: better training or more motivated and appropriate

staff? It would be unfortunate to impose a standard type of training if this would reduce the level of excellence in some companies' training programme.

Transport Focus is not in a position to know whether ORR could cover this task within existing resources or if additional recruitment would be called for. We would have no objection to ORR undertaking this role if it could do so adequately.

What would be the means of verifying? If based on the outputs achieved, it seems that this would offer a reasonable means for ranking performance. Output is the important goal. Those whose rankings were lower might then investigate how the better-performing companies' training programme differs from theirs. An element of management is also involved here. Effective management must be in place to ensure that staff behave as required.

Perhaps the most important source of verification comes from passengers themselves. A programme of 'call-backs' whereby users of the assistance service are asked to rate the experience will provide direct feedback.

17. We are particularly interested in hearing about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently available?

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18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to assisted travel?

It seems to us that frequent mystery-shop surveys are the best means to quickly see current delivery. ORR could seek to obtain details from operators' own such surveys or commission their own spot checks. Variance between methods of individual operators' own surveys may result in an imbalanced result, however, if an overall view were sought. This can be an expensive option. Perhaps a panel of disabled passengers, representing the widest possible range of disabilities and geographic spread, could be recruited for several years' service at a time; members could report on the effectiveness of the assistance on their journeys.

Again we would recommend the use of surveys amongst users of the assistance service; (see Q16).

19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long term?

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20. Do you agree with our proposed approach to updating the guidance?

Transport Focus agrees that certain aspects of the current guidance, though valuable as a means of defining minimum requirements, are now out of date and require considerable revision. While it was very useful at the time of its inception, it has since then failed to keep pace with technological or legislative changes and with industry best practice. A review is overdue.

Inclusion of industry best practice will be useful in seeking to raise the standard of all DPPPs. It is important that a revised Guidance is in place to ensure that, at the very least, minimum DPPP standards are maintained, though we expect operators to seek to emulate best practice where possible.

We do not disagree with any of the individual bullet points in the document but enquire whether this is to be a wholly ORR-internal exercise. The original guidance document was drawn up on the basis of a panel of representatives from a variety of organisations; we agree that updating should involve a wide range of stakeholders as stated in the consultation and suggest for instance DfT, DPTAC, RDG, several TOCs, Network Rail, Transport Focus, London TravelWatch and perhaps several disability-representative bodies. This will be especially important if aspects such as payment of compensation for poor or absent assistance or amendment to training regimes are included.

For the future it seems more sensible for the guidance to be kept as an electronic document.

21. Do you agree with our proposed approach to reviewing DPPPs?

We should be concerned if standards were allowed to slip in any way. Inclusion of best-practice examples in the revised Guidance will emphasise the need for operators to seek a high level of facility.

It is unnecessarily bureaucratic for operators to submit DPPP documents for annual review when no substantive amendment has been made. It will suffice for a standard confirmation that no substantive changes have been made to the DPPP if this is the case. It would, though, be disappointing if too many operators continually failed to offer any new features.

Perhaps some undertaking should be given for DPPPs to be reviewed independently midway through a franchise or after five years, for instance. Some significant improvement might reasonably be contemplated in most DPPPs during such a timescale.

Additional comments

There are a number of additional points which we should like to make, which affect the delivery of assistance but which are not covered in the Questions in the consultation.

Railhead stations during planned engineering works – road replacement interchange

Operating reasons may indicate a particular station as the intermodal transfer point for passengers, but where this involves an inaccessible station or one where access is awkward, special consideration needs to be given to the additional difficulties which this will impose on disabled passengers and on the staff who must assist them. Wherever possible, no interchange point should be inaccessible.

Examples have occurred where the station operator at such a railhead is not the operator of the trains which are affected. In these cases it has occurred that staffing levels have not been increased to deal with the additional demands and/or that road replacement services do not serve the station itself.

Recent examples of this include:

- West Croydon (managed by London Overground) but when GTR Southern services to Sutton and beyond are replaced by buses: the bus stop is several hundred yards from the station, some distance across the town centre, which means that connection times for passengers with mobility fatigue issues cannot be maintained. No guidance along the unfamiliar route is provided, even for visually-impaired passengers. The station operator would not provide taxis for those who could not walk that distance and who would have missed the connecting service in any case if they had, as it argued that the train-operating company was responsible; station staff would not contact the other operator but expected passengers to do so for themselves
- Selhurst (with a steep and noncompliant ramp to one platform and steps to the other three) is frequently used as the interchange point between train and bus. (It seems that Selhurst will gain step-free access in the next few years.)
- Barnes was selected as the inter-modal transfer point when the route via Richmond was closed. Only one platform has step-free access. Buses were stopping on the overbridge, requiring the use of yet another flight of stairs or a long detour via the narrow road to the station and then up (or down) the slope of the bridge. On this occasion, taxis were provided from Putney for those unable to use the stairs but the traffic conditions outside that station require a walk of several hundred yards, negotiating a major road junction (with pelican crossings), to the nearest point where taxis can pick up.

We accept that at times of unplanned engineering works this type of imperfect intermodal interchange arrangement may be unavoidable.

Exceptional/occasional use of inaccessible platforms

The island platform on the fast line at Balham, for instance, can be reached only by stairs; a lift was installed only on the relief-line island platform. When trains are routed on the fast line the station becomes inaccessible, yet staff at other stations are usually unaware of this and are reluctant to arrange alternative transport even if this change of access is brought to their attention.

In similar circumstances, trains can call at platforms which are not usually served and much greater distances stepping down from or up into the train are experienced than on the relief-line platforms. These distances are beyond the ability of some people, yet no warning is given and so no assistance is sought despite it in reality being needed.

Train operators need to consider the effects on disabled passengers of rerouting trains from the usual platform to little-used platforms, which have fewer or no suitable facilities. Station diagrams on the *Stations Made Easy* database often ignore the occasional use of such platforms and mark them typically as 'not in use', so unsuspecting passengers can be easily caught out. Often attention is not drawn to the fact that a different (inaccessible) platform is to be used, especially if the passenger is unfamiliar with the journey and with the layout of specific stations.

Passenger facilities on such platforms (weatherproof waiting accommodation, compliant seating, step-free access etc.) are, incidentally, often meagre or wholly absent, making it a highly unattractive environment.

Up to five minutes' wait at terminating stations for assistance to alight

It has been a feature of DPPPs for some years that at stations where a train terminates, it is acceptable for passengers to have to wait up to five minutes for staff to arrive to provide assistance. Section C2 (e) of the Guidance allows this. It has never been clear to us why this should be the case. At intermediate stations assistance to alight has to be provided as soon as the train stops to avoid delays. Transport Focus would like to see this proviso removed from the new-style DPPP Guidance if its retention cannot be absolutely justified.

Most London termini have no seats on the platforms where arriving passengers can await assistance and the rapid turn-round times of suburban trains means that waiting for assistance aboard the train is fraught with the danger that the train may depart before the assistance appears.

Use of agency staff

We accept that the presence of agency staff at some stations may be better than no staff at all, but many claim to be untrained in deploying ramps or assisting disabled passengers and thus the accessibility of the station is wholly compromised. As a result, booked assistance effectively fails and no warning is given to the passenger concerned until the last moment – by which time it may be too late. Where assistance has been booked it is unacceptable that no one qualified to provide it is on hand. We urge ORR to seek clear details from operators on the use of agency staff and the ill effects which this has on assistance provision.

Attempts to contact staff when assistance fails

The information provided in a number of DPPPs as to the steps to take when assistance fails to materialise seems to be inaccurate. Where staff do not turn up to provide booked assistance, it has proven impossible to resolve the situation by using either the help point (if provided) at the station or by telephoning the assistance line of the train company who made the booking or provides the service. This leaves the passenger stranded. The person answering the help point often claims to have no telephone numbers to contact the relevant station; the assistance line equally seems to have no telephone numbers to hand. In many cases it takes a long time to reach the assistance service by phone, especially later in the evening. Once the assistance service has closed only the help points remain but on many platforms at Network Rail stations there is no help point and often no staff are visible, even to those who have sight. When travelling alone, a disabled passenger is even more vulnerable in such a situation.

This situation is exacerbated when the train company providing the service does not provide assistance staff at the station (e.g. at many London termini). Help points need to be able to arrange immediate replacement assistance as should assistance-booking lines

Absence of station staff to confirm boarding

Following on from the point above, the system requires staff at the boarding station to contact the alighting point to confirm the booked passenger's presence and location aboard the train. At those stations without staff this role has to be assumed by on-board staff, but on those trains where staff are absent or fail to appear in passenger accommodation, this confirmation cannot be made and the booked assistance will probably not be provided. It is therefore vital to have a fall-back position on which passengers can rely to advise the alighting point that they are in fact travelling. The help points and journey-booking lines, as already mentioned, are generally reluctant and/or apparently ill-equipped to carry out this function.

ORR might want to seek clarification from each operator as to how this matter is dealt with currently and whether a best-practice method emerges. If not, ORR/RDG may need to create such a means of contact. (The same means could be used for emergency assistance, such as when a passenger has been over carried when assistance to alight has failed or a passenger is stranded on a platform.)

Our own research and ORR's more recent research still shows that retrieving passengers from trains remains one of the hardest areas to resolve satisfactorily. Some further research with train companies may well pay dividends.

The matter becomes all the more complicated where the train operator and station-managing company differ. It would be more helpful for the passenger if the fall-back position were identical, regardless of operator.

‘Double booking’ at some stations

At smaller stations where only one member of staff is available, booking systems allow a passenger to be booked to alight on one platform at the same time that another passenger needs to board another train at a different platform. Where only a single member of staff is available this can result in one of the booked passengers being disappointed or the train delayed, if on-train staff cannot step in. At some stations trains call frequently or departures and arrivals in each direction are close together; is it possible for the booking system to recognise when a booking has been made already at a particular time at a certain station so that at least the passenger can be warned or advised to revise his travel plans? Do operators have their own internal guidelines as to how to handle these situations?

Exceptional staffing of otherwise unmanned stations

In some DPPPs, operators undertake to provide staff at otherwise unstaffed stations under certain circumstances, although this detail is rarely clear as to the likelihood of staff provision. ORR may find it enlightening to investigate how often and in which circumstances those companies which supposedly offer such a service actually provide staff exceptionally at stations. The alternative is to provide a taxi; it is unclear how much training in dealing with people with disabilities taxi drivers in various parts of the country have had and in such circumstances it is the taxi driver who is acting as proxy for the train company, all of whose public-facing staff should have had suitable training.

Access to booking services on 26th December

Many operators shun the provision of assistance-booking telephone lines on 26th December, despite trains running on 27th and the need to enable assistance booking with no more than 24 hours’ notice. In many cases they refer callers to the assistance lines of other operators who are open on that day. It is unclear how much additional strain this places on those operators, whose passengers are thus inconvenienced by having other companies’ passengers transferred to them. It seems sensible to ensure that where one owning company has several franchises, at least one of those companies’ assistance-booking services should be available on 26th December and that passengers are transferred at no extra cost on that day.

In other cases it is unclear why certain operators are permitted to avoid providing this basic service. It appears that there is no safeguard to prevent all operators from withdrawing the service on 26th December.

Access on static on-train refreshment outlets

Some DPPPs offer those passengers who cannot easily reach the buffet counter the opportunity to request assistance from on-train staff. It would be helpful if this facility were extended to other services. To that end, inclusion in the Guidance would be a bonus.

Absence of staff on station forecourts when bus replacement services operate

Too often no members of staff are available to passengers (disabled or not) at the point of interchange with road vehicles. The revised Guidance needs to be quite clear about expectations in this regard. It seems to us that the DPPP's intention is that staff should be available to assist disabled passengers to/from buses or taxis on the forecourt, assisting with luggage as necessary.

Waiting times to be connected to telephone assistance helplines

Anecdotal evidence and personal experience, it appears, confirms the belief that answering times in general have lengthened over the last few years. In the case of emergencies, such as assistance failure, it is more important than ever to have much quicker access to assistance staff.

Accuracy of Knowledgebase and other accessibility information sources

Information on the *Stations Made Easy* pages is often inaccurate; on occasions the diagrams and photographs are contradicted by the text. In other cases station descriptions on operators' websites are at odds with this information. The information regarding station accessibility, for instance, in DPPPs may be different yet. We should welcome ORR's efforts in ensuring that all such information is rechecked by people qualified to do so and with good knowledge of the system to ensure accuracy. Passengers and assistance staff have to rely on these sometimes inaccurate or contradictory details to give information and book journeys.



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31st January 2018

Dear Sir/Madam,

Improving Assisted Travel: A Consultation

This letter sets out TfL's responses to the questions raised in the ORR's consultation on improving assisted travel. TfL is content for its responses to be published and shared with Third Parties.

TfL considers that the best approach to meeting the requirements of older and disabled users is "Turn Up and Go" (TUAG). This approach (backed by an appropriate training regime) ensures that the needs of this group are met in an effective and non discriminatory manner by treating them in the same way as a standard passenger, with additional assistance being provided as required without the requirement to book ahead. TfL has adopted this approach on both its National Rail concessions: TfL Rail and London Overground. TfL considers that it should be adopted more widely at National Rail stations in urban areas.

TfL is currently in the process of reviewing and updating the Disabled Persons Protection Policy (DPPP) for London Underground (LU) to incorporate all the services LU offers as well as the accessibility improvements it has implemented. TfL acknowledges LU's obligation to provide pre booked assistance to older and disabled customers at stations on the National Rail network where LU is the Station Facility Operator, covering all services that call at such stations. TfL is currently working with the ORR and the Rail Delivery Group to ensure that LU's updated DPPP meets all the criteria set out by the ORR.

Question 1: How can rail operators' improve the availability and promotion of Assisted Travel information in stations?

Information on Assisted Travel and similar services should be clearly available within stations and advertised on websites to maximise awareness

prior to the commencement of a journey. Staff should be briefed so they understand the system and its processes and can provide clear and concise information on it to passengers whenever this is required. This type of assistance and the provision of printed material is important for meeting the requirements of those who experience difficulty accessing online resources.

Question 2: Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

TfL considers that there are no reasons why passenger facing documents should not be required to achieve the Crystal Mark standard.

Question 3: What steps can be taken to increase website accessibility?

All websites should be evaluated against the Web Content Accessibility Guidelines (WCAG) 2.0 accessibility standard to ensure that they are accessible to persons with disabilities. TfL uses a number of tools to test its website against this standard to ensure that it complies and supports this with regular usability testing and expert reviews. This approach ensures that the TfL website is as accessible as possible.

It is also important that information on services provided for disabled passengers is easily accessible on operator websites. The multi modal Journey Planner on TfL's website is accessible directly from the home page and includes options that allow journeys to be customised to meet the requirements of passengers with disabilities. These options are in the process of being upgraded to include information on walking distances within stations and the number of steps per staircase to enable disabled customers to make more informed decisions regarding their travel options based on their individual requirements. Further information on accessible travel options is available on the "Transport Accessibility" page which includes references to TUAG and the Assisted Travel scheme.

Research conducted in 2016 demonstrated that the Journey Planner is a key resource for planning journeys with accessibility requirements. Awareness of this tool is high and it is widely used. Feedback from users has been proactively utilised to develop the Journey Planner, including the detailed navigation options it offers and the access information it holds for stations.

Question 4: How can rail operators use social media to increase awareness of Assisted Travel?

TfL makes extensive use of social media for its campaigns, including those aimed at passengers with disabilities. TfL primarily uses its Twitter feed to promote its accessible services to customers. This incorporates information on TUAG, step free access, maps and guides, travel mentoring and the

“Please offer me a seat” campaign. The “Please offer me a seat” campaign was also promoted through Facebook and through engagement with charities, advocacy groups and mainstream media outlets who all broadened the reach of the message using their own social media activity. The Twitter feed and other communications media are aligned with TfL’s accessibility customer database. Over 250,000 customers have registered their details with this database and signed up for updates and messages related to network accessibility. It is important that other operators adopt such a broad based approach to increase awareness of Assisted Travel.

TfL currently has 32,700 followers on the “TfLAccess” Twitter feed. A number of customers and stakeholders actively engage with TfL using the feed, demonstrating the success of the approach that TfL has taken to using social media to publicise the services it offers to disabled customers.

Increased use of artificial intelligence technology is also useful in this context as it enables operators to effectively respond to questions whilst customers are planning journeys or travelling on the network. The increased use of push notifications that are based on customers’ personalised preferences would also help to raise awareness of Assisted Travel.

Question 5: Are there any obstacles to providing Assisted Travel information no more than ‘one-click’ from rail operators’ website home pages?

TfL is not aware of any such obstacles. The information that the TfL website holds on accessible travel is available only one click away from the home page.

Question 6: Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

TfL’s preferred approach is TUAG. This permits ticket purchase to be undertaken at the start of the trip as would be the case for a standard journey, with assistance being provided by staff as required.

Question 7: How can rail operators’ improve the availability and promotion of Assisted Travel information to third-party agencies?

This can be improved through proactive, close liaison with groups representing older and disabled customers to ensure that they are aware of the options open to them. This should be a key role for stakeholder relations managers within operators. They can use social media to better promote services, hold community events or attend other forums run by local Boroughs or charities. TfL has taken this approach, running a programme called ‘Come on Board’, visiting around 100 local and grass-roots

organisations across London to help disseminate information about accessible services.

Question 8: How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?

Regular, proactive engagement is key to ensuring a productive relationship that drives improvements to the quality of service offered. As stated above, this should be a key role for stakeholder relations managers within operators.

Operators must ensure there are resources in place for dedicated staff who can undertake this engagement, whether with national organisations or local support groups and forums. Staff need to understand the issues older and disabled people face and come up with solutions that address these.

Question 9: How might the reliability of communications be improved?

TfL and its operators are currently developing mobile apps to improve the reliability and robustness of TUAG communications across the network, particularly once the full Elizabeth line service is in operation. The apps will enable all relevant information about the disabled customer concerned to be captured and transmitted to the station management teams, supporting the telephonic/radio communications used to arrange the assistance. This approach could usefully be adopted elsewhere, to ensure better communication of requirements across the interfaces between operators. It also needs to be backed by standardised mandatory training to ensure that staff have a shared understanding of how to interpret and meet the needs of disabled customers.

Question 10: Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

A cross industry protocol and joint system would undoubtedly be useful in improving the seamlessness of the approach taken, ensuring that passengers moving between services provided by different operators are catered for properly. The Rail Delivery Group could play a role in this area provided that it involved other public transport operators where there are significant flows between National Rail services and other modes. This is particularly pertinent in London where close integration with TfL would be required given the volume of journeys interchanging between National Rail services and those operated by TfL, including London Underground. Any such process would need to recognise the different operating processes used by operators to arrange journeys for disabled customers to ensure a cohesive approach.

Question 11: Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

This would clearly be of value in demonstrating the commitment given by operators and to give passengers a form of remedy when failures occur. Careful consideration would need to be given to how to implement such a system to ensure that it operates in a manner that is both fair and reliable and does not impose significant additional administrative costs on the industry.

Such a system would need to take account of situations where older and disabled persons travel for free, as they do in London when using the Freedom Pass. It is not possible to provide refunds where no charge was originally levied for the journey being undertaken.

Question 12: Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?

It would be preferable to retain a consistent approach to redress across the industry to ensure that older and disabled customers are treated in a consistent manner. Inconsistent treatment would not be justified.

Question 13: How can consistency in training for company staff across the industry on disabilities be achieved?

All training should follow best practice guidance developed through engagement with groups representing the interests of older and disabled passengers and enlightened by experience with the day to day operation of such systems. Training should not just be focused on front line staff but also managers and those responsible for areas such as transport planning to ensure that they are aware of the issues that disabled and older customers face. TfL is giving disability equality training to its senior managers and other staff during the 2017/18 financial year to address this requirement. Also, all new entrants to the London Overground business (regardless of their role) attend a briefing session which includes disability awareness.

The consultation documentation points out that passengers with hidden disabilities are often less likely to receive the assistance that they have requested. This is an issue of which TfL are aware. TfL's induction process for new staff incorporates a module covering the provision of assistance to those with hidden disabilities. Bespoke accompanied journeys are provided for customers with hidden disabilities by TfL Rail's Community Ambassador team to familiarise them with the network and encourage them to use it.

Question 14: How frequently should disabilities training take place and its content be refreshed?

TfL Rail train station staff four times per year. The training programme incorporates the latest information on how to manage passengers with all types of disability, generated through liaison with groups representing these customers. This approach represents a good model for the remainder of the industry to follow.

Disabilities training should be refreshed on a regular basis to ensure it meets evolving customer requirements. TfL Rail liaise with groups representing disabled customers to understand the barriers to travel that they face and use this process to inform regular updates to their training programme, keeping it current and relevant. The groups covered include some representing those with autism and other hidden disabilities and those with hearing impairments. In future TfL Rail will be working with MENCAP to make travel for people with hidden disabilities more accessible.

Question 15: Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

TfL has no comment to make in response to this question.

Question 16: Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/another party? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Such independent verification of the quality of training could provide a useful way of driving improvements and ensuring that a high common standard of training is achieved.

Question 17: We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

TfL is in the process of developing its approach to monitoring how well the services it provides to disabled and older customers are delivered. As part of this process TfL has launched an Accessibility Feedback Tool which collects regular feedback on day to day journeys from a panel of customers who experience barriers to travel. The panel includes disabled people, carers, carer assistants and those who travel with buggies. The approach is multi-modal and assesses a breadth of areas including staff performance, information provision and the built environment. The Tool will permit TfL to

monitor performance in these areas (including the effectiveness and efficiency of TUAG) alongside feedback provided by stakeholders and through TfL's Customer Service Centre.

Question 18: Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

The ORR could draw upon the data provided by tools like the Accessibility Feedback Tool mentioned in the response to question 17 above to gain valuable additional insight into the quality of service received by disabled and older customers, enabling shortcomings to be identified and addressed.

Question 19: Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

Refer to the responses to questions 17 and 18 above.

Question 20: Do you agree with our proposed approach to updating the guidance?

TfL agrees with the approach proposed which reflects changes that have occurred since the guidance was last issued in 2009.

Question 21: Do you agree with our proposed approach to reviewing DPPPs?

TfL agrees with the approach proposed, which would focus reviews by the ORR on occasions where material changes have occurred, whilst also ensuring that the ORR continues to monitor compliance in a proactive and effective manner.

Yours sincerely,

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Rail

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Improving Assisted Travel Consultation Response

Answer to Q1

Operators can improve the availability and promotion of Assisted Travel information in stations in a number of ways such as;

1. Through Customer Engagement Events – Meet the manager events at stations and a stand promoting assisted travel
2. Rail Awareness Open Days at stations with hand-outs
3. Displaying information such as policies at stations in leaflet racks
4. Posters at stations and public events such as Motability Events

Answer to Q2

This depends on the nature of the documents and certainly would be difficult to achieve such a requirement for timetables. Our view is that general documents such as Complaints Handling Procedures, Policies should achieve Crystal Mark standard.

Answer to Q3

A minimum standard should be determined and specified in franchises and be part of the ITT. Regular monitoring will help set high standards and increase website accessibility. The problem of setting one later means operators will choose based on where they are with their franchise and cost. TOCs will not invest large sums of money if they are almost at the end of their franchise.

Answer to Q4.

Proactively prompting customers on availability of Assisted Travel (Regular Tweets and updates on Facebook / other channels). Discussions (exchanges of Tweets) with those who use the system. Operators can Tweet disruption, improvements which are targeted. In Scotland, ScotRail carried out a targeted campaign towards Christmas using RNIB Connect Radio promoting assisted travel by blind and visually impaired

customers. More Assisted Travel articles are required and some of the space is free to use.

Answer to Q5

There is no obstacle in our view. Whilst we understand that operators want to maximise sales, if they care about customers who require assistance, they need to ensure that these same customers need ease of access to information too and not only navigating stations or boarding trains. The provision of the service to these customers should be considered as part of the whole package and a priority. Operators should market to disabled customers as they do to all other customers with caution in mind that disabled people cannot access information that is hidden.

Answer to Q6

It would be good to have tickets linked thereby allowing customers to have peace of mind. However, we are aware that other customers may not be able to pay via websites, over the phone, etc and the current arrangements gives choice whilst meeting equality and inclusion. In Scotland Assisted Travel provides options for customers to visit and ask for their request to be processed at stations too rather than a Call Centre environment. ScotRail and perhaps some TOCs to allow for disabled customers to buy tickets onboard the train because of where facilities are located and barriers posed by access between platforms. Therefore linking this to ticket buying creates problems of equality. It will be a question of where possible and not prescriptive.

Answer to Q7

There should be regular partnership meetings and in Scotland, ScotRail has regular meetings with regional Transport Partnerships (RPTs) whose role is overseeing transport strategies for local authorities within their patch. There are also Rail Awareness Open Days and these are advertised through Third Sector Organisations. Regular consultations build relationships with third parties especially where their views are taken into account.

Answer to Q8

This is the role of engagement and stakeholder management to arrange meaningful meetings with third party agencies where they share ideas and find solutions.

Answer to Q9.

At bigger stations, there is need to establish meeting points so that customers and staff know where they are meeting and this should be in the booking notes that both staff and customers receive. Removing generic confirmation documents promotes good communication. There should be a commitment by TOCs to give frontline staff smart phones so that Apps can be used that give realtime information. We believe that this is possible because most trains now have Wifi and improves connectivity around the geographic networks. With this in mind, operators need to carryout research on phone providers network coverage. Poor network connectivity means poor delivery of information to frontline staff. Another way to improving this is having people with rail knowledge and expertise help deliver the passenger assist. There is need for the industry to outline good practice and use it to benefit customers.

Answer to Q10

To some extend where the protocols are understood. Some of the issues in delivering Assisted Travel can be attributed to outsourcing where the responsibility for training is not with the operator even though its branded that way. The SLAs for outsourcing should be linked to the delivery of Assisted Travel and not number of calls received, time it has taken to convert those calls, etc. Whilst important to have these, it should be known that some calls can take longer to process and operatives will work on things that they are targeted by the outsourcing company rather than the aims of the TOC. Dedicated teams (resourcing) is important and there has to be a recognition that Disability Managers can't do everything in organisations. Yes, we believe RDG can play a vital role after all it is their role to bring their members together by offering guidance and direction but licence holders have the biggest slice of the work. RDG should deal with central issues that provide a platform to booking assistance and TOCs take their responsibilities for ensuring they have operational plans in place that deliver maximum benefit for Assisted Travel customers.

Answer to Q11

We support that idea provided this is not used as a means to cover up failure to deliver what seems to be straightforward requests from customers. We need to be aware that a lot of the customers who book assistance or use Assisted Travel only want to travel and refunding them does not resolve their aims and frustrations. Customers often say they are not looking for anything else other than being assisted. If refunding is preferred to show care, it must be straightforward, understood and detailed whose responsibility it is for interchange from one provider to the next, late running, disruption due to infrastructure problems etc. Otherwise, customers will endure further frustration in trying to get their money back.

Answer to Q12

Once there is industry standard, we don't believe that it will be necessary for individual operators to come up with another policy as redress for failure. Otherwise this will confuse customers and staff alike. There needs to be one option, either industry or leaving it to individual operators.

Answer to Q13

The issue is more that training and see this as attitudes and behaviours. ScotRail has for many years been training staff through third parties, disability organisations delivering Assisted Travel training spending around £1m a year and whilst substantial improvements have been achieved, we can never be satisfied that there are still no gaps. The difficult operators have is reaching out to those who have been in the industry who cannot be released from their duties simply because it cannot be afforded to find replacements. Changing attitude and behaviour courses are what has helped ScotRail achieve better results. However, we see the training being part of the wider Customer Service training. A disabled person is a customer and that is how they should be seen. Perhaps next franchises should be modelled around the ScotRail franchise which aims to achieve Vocational Qualifications in Customer Service. One of ScotRail's success has been the creation of Operations Communication Teams that brief staff all over the network therefore capturing 90% of staff as face to face, online briefings, Q&As and accessibility managers contribute to these briefings and material. Perhaps the industry could benefit by secondments to organisations that deliver high standards of customer service or bring people from these

organisations for staff to shadow. Another important part is recruiting people and the emphasis is on delivering customers service. In order to achieve consistency in training, there has to be industry recognised Customer Service Excellence Modules.

Answer to Q14

It should form part of competence assessments and every year and discussed at time with managers, one to ones, etc. However, there should be regular discussions

Answer to Q15

If the framework is still relevant, then we see no reason why this cannot be adopted. However, how does it differ or how much value does it add to already other frameworks used for Customer Experience Training would need to be assessed.

Answer to Q16

We believe to preserve independence benchmarking, Universities such as Strathclyde, Caledonian, etc who offer Masters Courses in this field are best placed to benchmark quality of training and can help set standards the industry should aspire to.

Answer to Q17

We don't have data to share

Answer to Q18

There is an opportunity to link NRPS with Assisted Travel rather than it being a standalone research and would answer most of the questions like helpfulness of staff etc.

Answer to Q19

There is potential for Passenger Assist Apps to allow for customers to provide feedback without the need for manual input. This would cut cost and give periodic data on satisfaction, completed assists / failures etc.

Answer to Q20

We agree that it needs to be reviewed and updated

Answer to Q21

Yes, we support this proposed approach but there needs to be timescales attached so that operators know when review should be completed if selected. This is for operators to allocate resources

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Improving Assisted Travel: A Consultation

The Welsh Government welcomes the opportunity to contribute to your public consultation about improving assisted travel on Britain's railways. The Welsh Government also recognises the importance of making the railway network a more accessible and inclusive service for passengers.

The Welsh Government makes a significant contribution to improving the accessibility and inclusion on the public transport network in Wales. In December, the Cabinet Secretary for Economy and Transport published a policy position statement about improving access to public transport, which includes six outcome focused objectives underpinned by a series of actions we plan to progress over the next four years in fulfilment of our statutory duty to advance equality of opportunity and the elimination of unlawful discrimination on the grounds of the protected characteristics introduced by the Equality Act 2010. Our statement and objectives can be viewed by visiting <https://beta.gov.wales/accessible-and-inclusive-public-transport-objectives>

These objectives have been developed by groups in Wales representing disabled people and will inform how rail services are developed in Wales. As the Welsh Government is to assume responsibility for rail franchising in Wales following the award of the agreement for the Welsh rail service later this year, we will be working closely with the new Welsh operator to fulfil these objectives in relation to local rail services.

I would also like to take this opportunity to draw your attention to the recommendations made by the Petitions Committee of the National Assembly for Wales in October 2017. <http://www.assembly.wales/laid%20documents/cr-ld11222/cr-ld11222-e.pdf>. The committee made its recommendations following evidence presented to it by the Whizz-Kidz Cardiff Ambassador Group. The petition called on the National Assembly for Wales to urge the Welsh Government "to ensure that [young] disabled people get the right to accessible public transport when required without the need to plan assistance at least 24 hours in advance. This will then give us the ability to be independent, seek employment, travel to work and meet friends at short notice. Whizz-Kidz Ambassadors are also campaigning to get

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Rydym yn croesawu derbyn gohebiaeth yn Gymraeg. Byddwn yn ateb gohebiaeth a dderbynnir yn Gymraeg yn Gymraeg ac ni fydd gohebu yn Gymraeg yn arwain at oedi.

We welcome receiving correspondence in Welsh. Any correspondence received in Welsh will be answered in Welsh and corresponding in Welsh will not lead to a delay in responding.

essential training for taxi and bus drivers as well as train staff in disability awareness and disability support”.

The Welsh Government has accepted the recommendations made by the Petitions Committee. In addressing the concerns expressed by the petitioners, we believe that improvements to the train operators disabled passengers protection policies is overdue and a more co-ordinated approach is required if our railways are to be fully inclusive and accessible.

In response to the specific questions set out in the consultation document, the Welsh Government is submitting the following observations.

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

The availability and promotion of assisted travel needs to be more prominently placed at railway stations with the introduction of passenger assistance points, where people requiring assistance can present themselves on arrival at the station for their travel, and where passengers can be provided information about the services on offer and how to arrange the service. Whilst train operators could improve the availability and placement of published information at stations, on board and on line, more effort to make audible announcements making passengers aware of the support available to them could be a feature of the methods of communication deployed to raise awareness.

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

No. Published information should be clear, concise and easy to understand. Published information should also be assessed by user groups for their effectiveness and any recommendation made by groups representing disabled and older peoples groups, where such recommendations are reasonable, should be adopted by train operators.

Q3. What steps can be taken to increase website accessibility?

As noted in the consultation document, some operators are currently meeting the World Wide Web Consortium (W3C) accessibility standards, as endorsed by the guidance published by the Office of Disability Issues (ODI). All operating companies should be required to achieve and maintain this standard. In addition, operators should be under a duty to consult with groups representing disabled people when developing information published for the benefit of disabled passengers.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Social media can be deployed by train operating companies to provide information to passengers using passenger assistance, but arrangements need to be in place in relation to people who do not have access to social media channels.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

No comment

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

Passengers purchasing a ticket for travel by rail in Britain should be prompted to consider whether assistance for travel is required at any part of the journey. When agreed by passengers, there should be a presumption for passengers booking tickets and benefitting from using a disabled persons rail card that assistance will be required and booked automatically during the booking process unless the disabled person declines assistance for the journey.

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

The arrangements for authorising third party retailing of rail tickets should be subject to a requirement to provide information to passengers about the availability of assisted travel. Within the context of data protection legislation, providing information to third party retailers should be included as a licence condition for train operators - and more importantly - when these services are not available at any given location.

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

Communication and engagement between train operating companies and third party retailers could be improved through reducing the need for each train operator to engage separately with third part retailers. The responsibility to do so should pass to the Rail Delivery Group on behalf of train operating companies.

Q9. How might the reliability of communications be improved?

Train operating companies need to increase the availability of free WIFI to ensure that passengers remain connected without the need to use data capacity provided as part of their smartphone agreements. However, the use of electronic media and smartphone applications should be considered as supplementary communication aids to published materials and audible station announcements.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Removing the duplication of effort by train operating companies would improve consistency of information, raise awareness, better co-ordinate service provision and improve resilience. The RDG is best placed to deliver a consistent passenger assistance programme across Britain on behalf of train operators.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Refunding the cost of travel when train operators have failed to provide the required service should be regarded as a minimum. This does not however take account of the negative impact that failure to provide this very important service has on the travelling passenger. Failure to deliver assisted travel when arranged can have serious implications for the journey being undertaken and can have a serious detrimental effect on the physical and mental health of the passenger needing the service. In some cases, where the train operator is proven to be at fault for the failure of service, compensation above the cost of travel should be considered as a penalty.

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

There is a need to maintain a consistent approach to redress and remedy issues when they arise to ensure that passengers can be made aware of their rights across the network. Adopting distinct and separate policies across the network could result in passengers being treated less favourably in one area when compared to a passenger in another operating area so at least minimum standards need to be consistently applied. It is especially important to maintain consistency in areas where multiple train companies are operating.

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

There are two options possible to improve the consistency of training provided to staff working in the industry. Firstly, adoption of formal accreditation for training programmes provided to staff by train operating companies could ensure that consistency is improved across the network. Operators could be required to develop and deliver training meeting core requirements. An alternative approach would be to require training to be delivered by a single provider to a required standard. Either way, it is important for understanding of the training provided to be assessed to ensure that trainees have understood the training provided and are able to put the learning into practice. Training must be developed in collaboration with groups representing disability groups.

Q14. How frequently should disabilities training take place and its content be refreshed?

Recommendations made by the Welsh Government's Accessible Transport Panel suggests that disability awareness training should be provided to customer facing staff and once provided, be subject to refreshment at intervals not exceeding five years. In the event that a need for further awareness training is identified in a shorter timeframe for some staff, then this training should be provided as a matter of urgency.

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

Yes, on the proviso that the training framework proposed by DPTAC and adopted by the Department for Transport is subject to periodic review and updated when it is appropriate to do so.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/AN other? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

There are two issues here: the quality of training and the impact on passengers. The body responsible for the setting of the standard of training to be provided should also assume responsibility for the assessment of the quality of training provided. The training provided may be delivered to a high standard, but fails to deliver the improved service that disabled

passengers have a right to expect. The independent verification therefore depends on the delivery model chosen, but the primary responsibility would appear to be best placed with the DPTAC as the committee representing the interests of disabled passengers.

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

The Welsh Government is not aware of additional data being collected within the rail industry in relation to the assisted travel programme. As part of the new agreement to deliver the new Welsh Rail service from October 2018, it is expected that monitoring of the assisted passenger programme will form part of the regular monitoring reports provided by the new rail operator. The Welsh Government is committed to ensuring that passenger focused outcome measures are included as part of the performance monitoring regime.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

It is noted that the ORR is proposing to take steps to improve the quality, consistency and comparability of these data by strengthening the data collection guidance documents to help ensure each licensee records Assisted Travel provision data in a consistent way to enable better performance benchmarking. Secondly, it is proposed to hold an industry workshop with licensees in January 2018 to encourage them to share knowledge on best practice about data collection methods. The intention is that by the commencement of the new regulatory reporting year 1 April 2018 – 31 March 2019, the dataset will be sufficiently robust to allow the ORR to begin publishing these data. It is important, however, that any mechanism to improve data recording also includes a requirement to provide information about where services have not been delivered and in, such cases, what action has been taken to remedy the non delivery or the issue that has been recorded. Licensees must be required to take corrective action within a prescribed timescale and assurance must be provided that corrective action has been taken within that timescale.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

The Welsh Government has no further comment to make at this time.

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

It is proposed to update the guidance to

- ensure that it refers to current legislation and best enables operators to comply with their equality duties;
- update on any areas where technology has changed for example the use of social media or smart phone applications;
- restructure the document to more clearly set out the minimum requirements that all DPPPs must comply with;
- reflect changes arising from responses to the issues raised in the earlier chapters of this consultation document; and
- highlight good practices carried out by operators that go over and above the requirements of these minimum standards.

Whilst these changes are a sensible approach to updating this important guidance, the ORR could go further in some areas. For example, restructuring the guidance document to more clearly set out the minimum requirements that all DPPPs must comply with does perhaps not go far enough to observe the purpose of the policy: to improve the ability of passengers to access the railway network to meet their travel needs. The guidance needs to establish the minimum levels of service that need to be in place to enable this, which needs to be clearly set out in the DPPPs. DPPPs must also be drafted and published with the involvement of disabled passengers.

Additionally, the ORR's proposed guidance should not only highlight notable practice. The guidance needs to illustrate the negative impact on disabled passengers when the required services are not delivered. The rail industry needs to be a sector that learns from its mistakes and the impact this has had on passengers who depend on the provision of a service that better meets their needs.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

The Welsh Government agrees with the ORR using its powers through Condition 5 of the licence to require operators to undertake a review of their policies or the way in which they have been implemented at any time. This is particularly important in instances where there is credible evidence suggesting that operators are not performing as expected or where an issue has been identified with how the policy is being implemented in practice. In such a case, operators should be required to carry out a review of their DPPP and its implementation and report the outcomes to ORR, and make changes to their DPPP as required by ORR.

Stephen Chamberlain
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Llywodraeth Cymru / Welsh Government
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Improving Assisted Travel: A Consultation by Office of Rail and Road (2017) Response from West Midlands Trains

Since December 2017, West Midlands Trains has operated West Midlands Railway (WMR) and London Northwestern Railway (LNR) - two new railway brands for and to the Midlands, the North West and London. West Midlands Trains is a joint venture owned by Abellio, Mitsui and East Japan Railway Company (JR East). Each business brings a wealth of knowledge and expertise to the franchise, building on our staff's committed work and experience.

As we are in the first two months of the franchise, many initiatives and projects of our ambitious plans are in early developmental stages. Nevertheless, we welcome the opportunity to respond to this consultation.

Chapter one - Raising Passenger Awareness

As a general point, in order to improve awareness of passenger assistance services, we would welcome a discussion about the industry agreeing to use one brand name for the service. It would need to be a unique term eg 'Passenger Assist' or 'Assisted Travel' to avoid confusion with general customer service/assistance.

We would also urge careful thought being given to the use of the term 'turn up and go' in customer-facing communications. For example, we are obliged to introduce a 'turn up and go' service from a select number of stations in the future but we also accommodate unbooked assistance requests at present whenever we can. Customers need to understand that there is a difference about where support for spontaneous travel can be guaranteed.

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

We promote the service in our DPPP and on our websites. Copies of our DPPP document "*Making Rail Accessible: Helping Older and Disabled Passengers*" are available within leaflet racks in all our staffed stations. It is valuable to know that this hard copy format is the preferred method of information for most survey respondents in the research study. We have tried to make our booklet attractive in order to maximise the number of people who notice it and pick it up.

We would welcome the opportunity to review how well the industry's current DPPP booklets meet customers' requirements on what they need/want to know. In turn this will enable the DPPP to evolve into palatable, valuable and effective sources of information. For example, is too much information in one leaflet counter-productive? Are people with certain impairments disproportionately disadvantaged by documents with more or less text? Communicating information in the right way (or combined set of ways) will increase awareness of passenger assistance as a service and reduce unnecessary printing volumes

We are also taking the opportunity to remind staff of the different terms that passengers may use to refer to the document (eg 'Making Rail Accessible', 'D triple P', 'DPPP', 'Assistance leaflet') as we suspect this may be a barrier to awareness levels and promotion across the industry. Although the ORR clearly articulates the rationale for the names of the documents, the industry and passengers tend to use a series of terms interchangeably.

We plan to produce cards for station and on-board staff to give to passengers, at their discretion, which provides the contact details for booking assistance (an initiative launched in the previous Franchise). We are mindful that this initiative is less likely to reach passengers with invisible impairments.

We would be interested in exploring the use of posters as a promotional tool for the service but suggest a pilot is launched to test how effective the approach is at increasing awareness. If the results prove that posters do indeed work, then a consistent approach would be valuable to ensure passengers understand that it is an industry-wide approach rather than specific to a train company.

Promotion of 'turn up and go' services need to be carefully considered to manage customer expectations, particularly where the service is formally confined to certain stations, to avoid disappointment and inconvenience to passengers e.g. in the case of turning up at unstaffed stations. Greater awareness of the booking service for passenger assistance needs to go hand in hand with promoting 'turn up and go' so passengers who are not travelling spontaneously are aware of the option to book.

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

In principle, we support this idea but believe it would be best placed to be introduced after a review of DPPP content requirements (minimum and maximum) as explained above. We are mindful that for some people the size of (and level of detail within) our document "*Making Rail Accessible: Helping Older and Disabled Passengers*" might be challenging. Clear and plain English is crucial but it is also important to consider volume of information communicated as well.

We produced in readiness for launch, and continue to make available, an easyread version of both our DPPP documents.

Q3. What steps can be taken to increase website accessibility?

Simple, clear, uncluttered and intuitive websites benefit everyone but particularly some customers who accessibility barriers. Some steps which may be helpful include:

- Ensuring websites are suitable for a range of screenreaders so customers can use their preferred tools;
- Pages and content built with semantic HTML markup;
- Ensuring websites are suitable for a range of browsers (including at least the three most recent versions);

- Code/content organisation for logical screenreader playback;
- Pass A standards and aspire to AA standards, using web accessibility evaluation tool (WAVE) to check markup against AA standards;
- Accessible font size and colour validated with online colour contrast tools to ensure legibility; and
- Ensure that web agencies are abreast of evolving best practice, communicate with accessibility organisations/experts and are part of the WebAim community forum

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

This year we will introduce a 24-hour social media service which will increase our ability for how we can best use social media. This will provide us with opportunities to explore how this can benefit the passenger assistance services, both in terms of general promotion and responding to individual passenger queries and problems. We will consult with our Stakeholder Equality Group¹ throughout the process.

You refer to research which suggests that older disabled people are far less likely to access the internet than older non-disabled people² and that only 10% of actual users under 34 years old³. As only a proportion of passenger assistance customers will access social media, and with age being a relevant factor, social media can only be one of range of channels of communication.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Currently, on the homepage of WMR and LNR websites, 'Accessible Travel' is one-click on the bottom banner and two-clicks on the top banner (via 'Travel Information'). The overriding objective should be to find the information logically, swiftly and intuitively, rather than based on 'number of clicks'.

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

Some customers do not want to book assistance when they book their ticket e.g. they might book open tickets or discounted rates in advance but not be able to commit to identifying specific train times for their assistance until much nearer the date of the journey. Our passenger assistance booking services and ticket sales services are not currently provided by the same supplier, meaning the two services are separate. We are looking to make the process as simple as possible if customers are transitioning between the two booking lines.

¹ Stakeholder Equality Group is a new initiative which will meet quarterly and comprise stakeholders and customers who experience access and inclusion barriers. They will act as a consultee on our plans and projects, provide feedback on their experiences travelling with us, share ideas and help set targets for our passenger assistance services.

² Para 1.24

³ Para 1.20

Our online passenger assistance booking form separately addresses impairments and support needs. We give passengers the option to list *multiple* impairments (rather than a drop-down box requiring one choice) and allow the passenger the option of 'prefer not to say'. We do not require passengers to provide their postal address on the webform as this is time consuming for the customer and collecting this personal data is unnecessary. There is again no reliance on holding a ticket to book assistance.

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

In addition to our own direct requests, we are hoping to benefit from the relationships and contacts of members of our Stakeholder Equality Group to secure the agreement of third parties to stock our DPPPs in their leaflet racks. Some venues are hesitant to take on a commitment and have policies against third party materials but we have already secured the agreement of the Library of Birmingham and several tourist information centres. We would also point out that a large proportion of potential/actual customers in passenger assistance services are not connected with charities or need routine medical support so it would be valuable to conduct some research rather than rely on assumptions about their networks.

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

Our Stakeholder Equality Group will comprise a range of stakeholders, including advocates for passengers who experience access and inclusion barriers. This will enable us to explore and consult on new initiatives, but also work collaboratively on solutions and interventions. We are working hard to achieve a breadth of expertise on the group, with an intersectional approach to disadvantage, and regional-specific knowledge. We are also mindful that we cannot rely on one charity to represent everyone with a specific impairment and that we need to find ways to engage with people who cannot attend traditional daytime workshops e.g. disabled commuters.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

As the industry explores new technology and database solutions, we would welcome an automatic communication channel (via email, SMS and telephone message) to alert passengers who have booked assistance that there may be disruption to their planned journey. Doing this manually is resource-intensive and therefore unreliable for the passenger. An intervention like this might improve trust in and use of passenger assistance services.

Stations Made Easy is a very valuable communication and journey-planning tool. It needs to be easily updated and promoted to customers.

We are working on the trial of an app for passenger assistance. This will let customers know that we are on our way to help them alight and therefore hopefully reduce any unnecessary anxiety and misunderstandings and improve confidence in the system.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Yes, a cross-industry protocol would be welcomed.

Working to agree consistent approaches for passenger assistance is crucial to minimising misunderstandings and false expectations. For example, we are working hard to introduce a significantly reduced booking horizon for passenger assistance but we can only offer this on journeys made wholly between our stations as other station operators will not have access to the technology we will use to achieve this.

A crucial part to delivering passenger assistance is telephoning connection and destination stations to expect the arrival of the passenger. This manual and resource-intensive process sometimes fails and lets the customer down. Whilst we are exploring technology solutions (like other train companies) an industry-wide approach would have a positive impact on cross-TOC journeys.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes. If a passenger books assistance and it is not provided, we commit (and publicise in our DPPP) to investigate the reason for this and pay compensation to the passenger depending on the nature and extent of the failure. In addition, our Stakeholder Equality Group will be empowered to use the feedback gathered through call back surveys to agree Passenger Assistance targets for us in relation to reliability, punctuality, quality and professionalism. Where we fail to meet these targets we will refund the cost of the journey to the passenger. This demonstrates our commitment to the passenger assistance service and strengthens levels of trust in it. It is useful to define and communicate the scope of any refund policies to ensure clarity and transparency. See response to Q12.

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

Our commitment to refunding passengers for failures in delivering booked assistance is set out above. One challenge is agreeing whether the scope should be limited and, if so, defining a suitable policy. We state that the sum paid will depend on “on the nature and extent of the failure”. This provides us with an element of flexibility to set a fair amount based on individual circumstances.

To illustrate the challenges in investigating/resolving issues, here are some hypothetical scenarios as examples:

- A passenger books assistance to include boarding/alighting the train, help with luggage and leaving the station. On alighting the train, the passenger tells the member of staff they are ‘OK from there’. There is no evidence of this conversation. Would a refund be payable because the member of staff did not deliver *all* aspects of the assistance requested on the booking, albeit not wanted on the day?
- A passenger books assistance for a long journey (perhaps even First Class) with one or more connection across several TOCs. There is a failure to provide assistance on the final 15-minute leg of the journey (accounting for 10% of the cost of the whole journey). Is the refund payable for the cost of the whole journey or the aspect that failed?
- A passenger books assistance for himself and books tickets for his support worker, partner, child under 16, child over 16 and a work colleague. Should the refund cover everyone in the passenger’s party or be left to the train company’s discretion?

Other relevant factors in setting the compensation sum would include the timing of the incident and severity of the consequences for the individual passengers (including safety and missed connections). Therefore, refund policies need to allow flexibility to reflect the circumstances rather than adopt an ‘all or nothing’ approach.

Chapter three – Strengthening staff training

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

A consistent approach would require identifying and agreeing a range principles for training e.g., the social or medical model of disability, disability equality or disability awareness training etc. These principles will go on to influence policy, language and internal/external Communications in different ways through the train company and industry.

It might be useful to update the ATOC e-learning package for the industry. We propose that face-to-face training would supplement this and enable each train company to embed its own ethos, values and customer service approach within the training.

The research study in the consultation paper identified that staff were sometimes “unable to spot passengers with hidden disabilities”.⁴ It is disappointing that one in four people with invisible impairments are less likely to receive the assistance they had booked.⁵ In this respect, training can only support staff to be aware that many people who need help may have invisible impairments and to understand the range of barriers/solutions that may apply. Training cannot help staff to identify people with invisible impairments. For this reason, we provide passenger support cards and priority seat cards free of charge for passengers to discreetly show others they need assistance or a seat. In addition, we are exploring pins and badges passengers may choose to wear to indicate they require support and remove the need to physically hold a card if this is challenging.

Q14. How frequently should disabilities training take place and its content be refreshed?

Face-to-face training is logistically challenging so we would suggest disability equality training take place at induction with refreshers every few years. This can be complemented with e-learning, where appropriate.

There is great value in partnering with charities and other organisations to deliver training. However, it can be logistically challenging to deliver sessions via a third party to all staff and so it is important to be mindful of the risks of disseminating inconsistent messages.

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

The DPTAC framework would need to be updated if it were to become mandatory, as the legislation and organisations for further information are out of date. A review would then enable updates to the content where DPTAC considers it necessary. For example, it may be helpful to clarify the recommended scope of ‘simulation’ as a training style as many disabled people are uncomfortable with and query the effectiveness of this approach. In addition, it is important that mandatory training content doesn’t stifle innovative approaches and have the unintended effect of hindering progressive approaches in a competitive commercial environment. We would also be interested to discuss the rationale of placing this training as a mandatory element of the DPPP as training contents (like all types of staff training) are not necessarily customer-facing.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be

⁴ Para 3.16

⁵ Para 4

used to rank performance to highlight good performers and require improvements of those who are struggling?

We are concerned about this proposal. Training takes place in a variety of ways – on induction, via a specific course, on-site technical demonstrations, via internal guidance booklets, via routine Comms updates/briefings, at one-off commissioned workshops etc. It would be practically challenging for a third party to fully assess the quality and breadth of training and resources in this manner and therefore we query whether this would be an effective intervention.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

None.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

All station staff who provide passenger assistance can record details of all instances of assistance they provide via their smartphone. We can therefore monitor levels of assistance provision which has been booked and not booked in advance, not delivered but booked, not delivered and not booked and instances of passenger 'no shows'. We report this data regularly to the ORR.

The Regulator requires data to fulfil its monitoring responsibilities. In turn, that relies on staff manually recording this data so further data collection requirements would not be appropriate until industry-wide technology is in place for efficiency (see Q19).

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

Any industry-wide technological applications which make it easier and more efficient for frontline staff to record assistance provision would be welcomed.

Chapter five – Reviewing DPPPs

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

Yes. In addition we respectfully propose that

- Subject to a review of requirements/scope/detail/word count requested above, a template version is compiled for customisation by the individual TOCs; and

- In relation to highlighting good practice, it would help to identify what are mandatory services/processes and what is discretionary best practice.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

In principle, yes, as we believe it focusses resources more wisely. It would however be helpful to understand the reason for and scope of an internal review and whether this aligns with the rationale of removing the requirement for an external review.

30 January 2018

I would like to comment about services for blind and partially sighted people. The staff my blind partner and I have dealt with have overwhelmingly been helpful and positive, genuinely caring about giving a good service and ensuring she is safe and content.

The rail network passenger infrastructure we have to negotiate is lamentable in comparison to, for example, Eurostar, London Underground or most European rail networks. For example, the step height between platform and train carriage floor varies markedly and in some stations, such as Chester, is so great as to be dangerous. This situation is compounded by the motley collection of old, outdated rolling stock (particularly that of Arriva Trains Wales) where each train type has its own idiosyncratic arrangements for opening doors, steps and grab handles.

The ticket barrier arrangements at most stations need to be staffed because of their unreliability as much as their lack of suitability for purpose. A consistent model across all stations would be much better; again the London Underground is an example of being good enough.

These problems affect everyone with a mobility problem but are made more difficult for blind or partially sighted people who have to guess where the switches, handles, ticket/card swipe, signage or braille might be.

Surely the monies assigned to major infrastructure projects (I'm thinking HS2 etc.) would be best allocated to ensuring that all rolling stock and platforms provide level access and consistent arrangements for opening and closing doors? Let's make what we have fit for an inclusive society before building another variant.

I am a wheelchair user who regularly travels from Edinburgh Waverley to Duke Street in Glasgow via Queen Street and from Edinburgh Waverley to Carntyne direct.

Carntyne and Duke Street stations are both unstaffed, issues can be made worse by the connecting trains being driver only resulting in staff at Queen Street and Waverley stations being unable to permit me to board the respective trains.

This is despite me calling the helpline well in advance and requesting assistance to board and disembark the respective trains.

I specifically choose Duke Street and Carntyne stations as they are the nearest accessible stations to my chosen destination.

It would be easier for all concerned if the ramp was electronic and operated by a card and PIN rather than having to be physically removed from cupboard by Scotrail staff.

This would save the stress of being told that you cannot board the train due to it being driver only and having to make alternative arrangements.

One of the most difficult aspects of travelling by train in a wheelchair for my son has been the complete inability to reserve a space on Northern Rail services.

We have had the ironic situation where they will happily book (and provide) passenger assist on and off a specific train; but without being able to reserve a space there is absolutely no guarantee that the wheelchair user will actually get on the train!

Other train operators manage to book spaces quite happily (Virgin, FTP) but for some reason Northern do not and come up with some fairly dodgy excuses when asked why this is the case. I have been told that it is a health and safety issue, that it is because power chairs cannot fit on the train etc etc ...all nonsense. They have even claimed that as they do not offer ANY seat reservations for anyone they could not do it for wheelchair users...

I have pointed out that if a train is fairly full, a walking person who can stand up can usually get on but a wheelchair user simply needs more space and cannot just squeeze in!

Our local line (Furness between Lancaster and Barrow in Furness) used to be predominantly FTP trains which allowed booking and had decent access.

Now however it is almost all Northern, old rolling stock and no reservations. So a wheelchair user who wants to travel to Manchester airport to catch a flight, for example, cannot be sure that they will actually get onto the train (if the wheelchair space is already full, or there are piles of bags) and therefore in order to ensure that he would get onto the train we had to drive my son and his helpers to Oxenholme

(27 miles away) where they could catch the FTP Edinburgh - Mcr airport service, rather than get on our local connecting Northern rail service

(1 mile)

I am pleased you are doing this detailed research. I have used assistance on a couple of occasions when travelling between Bristol Parkway and Reading with a relative in her 90s who needs a wheelchair in order to go the distance on a large station. It has worked out as planned, and staff have always been very helpful and pleasant. The staff taking bookings on the phone have been excellent, pleasant manner and taking care to get it right.

It's a great service, thank you so much.

For improvement - I agree some staff could be better trained in how you talk to someone with a disability, ie ask them what help they need and how, rather than making an assumption.

As we keep trying to tell you, PDF is not an appropriate file format for this kind of work. I'm having to flip between apps to answer this, and read in a format where I have no navigation whatsoever as a BLIND person. Please stop using PDF for this kind of thing, and present the information and questions as accessible web pages. I don't need braille, large print or anything, I need a more accessible electronic version, IE a simple webpage, which is probably cheaper than a PDF. Here goes anyway.

1. They must advertise it as one of their services, they never mention it in any standard literature. They should tweet about it, mention it in adverts, and not pigeonhole it as a disability thing as most older people don't think of themselves as disabled. I know about it because I know about trains, but many older and less disabled people aren't in the system like I am.

2. Of course everything should be in plain English, and people need to know what they can get help with, and that that help will turn up.

3. Stop using PDF to present such information and have it on a customer service page as a heading, with links to book said assistance and the phone number listed. Actually, most of the sites themselves are pretty good, but the underlying documents are not so much.

4. They don't tweet about it at all, do their Twitter staff even know about it, or how it actually helps people. Do they ever employ anyone who uses it specifically to promote it? No, they probably don't. Maybe it should be a national scheme which can afford to do this stuff, rather than each company's responsibility.

5. I think they should have a how we help passengers link or something of the sort, but an assistance link on the homepage as part of a list of links might get lost, it would need to be under an appropriate heading (yes, I mean HTML heading).

6. That is essential. Not being able to do both at once is a huge problem.

7. Most of the suggestions you make assume that people can read print. Many who need assistance can't, so please think about telling people in ways other than print. It's not just blind people who won't read it, but many who are losing sight due to old age and don't consider themselves blind, and who don't have organisations. TV adverts and radio adverts would probably target more people, and of course work with RNIB.

8. They should work with actual disabled people, not just organisations, specifically, find out the needs of blind people, use services like Describe-online.com, fund their guides of stations which are more

accessible than the National Rail ones as they give blind friendly directions and descriptions, which the website tries to do, but fails badly. Half the time we can't even find assistance points.

9. Whenever somebody gives assistance, they should ask "do you want me to ring through to the next station for you"? If we say yes, they must be clear where we are on the train, taking account of reversals which many staff don't know about, and tell them how to identify us. Further, often we only need partial assistance, so if we say something like yes, can you get them to give me a hand off the platform, that's what they pass on.

10. This question is unclear due to the file format used, no heading to show us when it finishes or anything because it's a stupid PDF.

11. I think that depends why the assistance doesn't work properly, it could be a passenger didn't turn up or something.

12. No, one national policy please.

13. I don't see how you can do this without renationalising the railway.

14. Before the staff do any customer facing work of any description, and probably again annually or something.

15. Yes.

16. Yes

17. I'd rather they concentrate on doing rather than monitoring.

18. Put an accessible survey, (not, under any circumstances, a PDF) on their website, for people to use any time they need to, and not provide the age old answer that if you book it will work, which they do, even if you do book, clearly they don't read complaints.

19. As above, and train social media staff to provide the feedback they get, rather than phobbing people off to an email address.

Further comment: What could be done to improve the actual assistance?

This rather vital question, probably the most fundamental of all is not addressed at all here. I have a few suggestions.

A. Train despatch staff should always check the platform before a train arrives and again when it leaves, and offer assistance themselves to people who are obviously standing waiting, especially if obviously disabled, like people holding a long cane or in a wheelchair. We often just need a hand out of a station rather than total assistance, and could manage without at some stations altogether if staff were more flexible.

B. We often don't get chance to use the station facilities like sighted people.

People need help getting on to trains as I suffer from a disability it would be great to know that I can get help if I need it .

I strongly believe that as well as a Driver, there should be a fully qualified Guard on board every train to assist and provide safety to the travelling public. I have a 93 year old mother and can rest assured that when she travels by train that she gets looked after at the moment. This would not happen if the train was Driver only

All needed for our and passenger safety no more job cuts please!!!!!!

I and my family believe that passengers deserve more than just a guaranteed driver on a train and that as a minimum there should be a fully qualified and safety critical Guard, as well as the driver.

I and my family believe it is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and reassurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

I hope you will take on board our concerns and ensure that these essential staff are retained so that my family and I can have the same access to rail transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and safely.

Thanking you in anticipation

Hi,

I would still like to see rail staff on trains and stations

Please take note of the Disabled passengers on this. We have a disabled son who relies on on train staff to assist him. he already cannot travel on our local southern trains as many trains operate without a guard so cannot get off at fishbourne. Our other train company at havant is SWR Who also want to run trains without guards. We need guards on trains.

I fully support to retain guard operated Trains. It is important to protect our passengers especially late at Night when Trains run often especially near and including weekends with Alcohol fuelled individuals with no respect, or regards to any women or young children who may be Travelling, and I fully support this RMT Stance by its members.

We need to keep trains staffed

It is essential to maintain staffing levels on trains and in stations because;

There was a time when cutting British jobs to favour foreign Governments and Corporations would have been considered treason.

If these organisations need to cut costs then the TOC's should review the 'value for money' they receive from third party businesses that bleed the railway. Train leasing, infrastructure and improvements.

Where one nationalised Railway would have one set of directors, managers, HR, finance etc, multiple TOCS duplicate (many times) the management and logistical costs that do not benefit passengers.

A profit driven railway requires that costs are cut to maximise corporate bonuses and shareholder dividends! How does this benefit the economy, towns and businesses that are dependent on the railways for staffing?

If the TOCS need to be more efficient then they should review and discard the many ineffective, short sighted structures and profiles that make the Railways so difficult to run effectively, ie;

Full Train Working means that a train crew (Driver and Guard) work one train on one route. If that service is delayed then a spare train crew can reinstate a replacement service from the next depot.

Current crew rosters require that both guards and conductors work multiple different trains and routes each day. To achieve a negligible costing efficiency train crew Passenger and Assist (travel between different locations to start working different services. So if one train is delayed longer than the scheduled travel (between services) then those services are instantly delayed, this chain reaction radiates out across multiple services and companies, one delay becomes (by default) multiple delays.

Frequently the situation arises where a train cannot leave a station as its Driver or Guard (sometimes both) are on a train waiting outside that station, this train cannot enter the station until the uncrewed train is moved.

And to take us into the realms of idiocy each TOC and Network Rail are penalised for delays with monetary fines, which have to be accurately attributed to the correct organisation. This is the Blame Game perfected.

A signal fails (infrastructure) so multiple trains are delayed, as previously explained this radiates out effecting the entire Network. So the TOCS blame Network Rail who have to pay costs.

The next day a Driver is taken sick, the delay finding a replacement crew effects multiple services so the other effected companies seek costs. The accumulation of delay attribution effectively creates a situation where multiple companies owe each other monies based on variable reasons.

You could not with any sense devise a more ridiculous or convoluted arrangement.

‘Wasteful, inefficient and against any sensible reason’

The move to reduce a Conductors safety critical role and the role out of DOO has no merit other than reducing delays created by displaced train crew.

‘If we can run trains without a Guard we reduce the costs of delay attribution’.

Currently foreign governments and various parasitic organisations are working to bleed or Railway to subsidise foreign networks and corporate profits. We are paying for Railway Improvements and staffing across Europe, while decimating our own infrastructure and work force to pay for it.

People, communities, businesses and regional economics are dependent on the Railway. Why have we gifted this essential piece of infrastructure to groups and industries who are in every conceivable way set in opposition and competition to our best interests.

The Southern management of a large part of our Network has hobbled and damaged the South East’s economy. The companies involved are owned by governments that have benefited (economically) from these manufactured problems.

Despite this inconceivable travesty this Government and its pet media are singularly determined to blame the front line workforce in their ideological crusade to crush the unions.

Nationalising our Railway is not revolutionary it’s just common sense.

Regards

I work for a Railway company and consider it complete madness to consider introducing D.O.O. Train services. I have witnessed incidents such as a person slashing his wrists on the train and the service being cancelled with no onward transport for the passengers. Also drunks a plenty, disabled people unable to get on/off the trains, vulnerable elderly people and foreigners in confusion with no station staff for assistance or to provide information. Plenty of other episodes over the past 10 years which disgust me as the policy of profit before people is paramount in political and business circles. We have been let down badly by those we choose to make decisions on our behalf. In a rural area where I work the stations are unmanned, People travel without tickets frequently as they are unable to purchase them on the platforms and the trains are often overcrowded so the guard cannot make his checks and stations without barriers staffed. Without a guard no ticket checks would be made at anytime, free travel more so than at present and the T.O.C laughing all the way to the bank as the government are subsidising the routes, paying passengers or not. Coming from a business environment with enormous pressures I understand the need to perform efficiently at the highest level. This is not the way!
Wake up you lot.

Frankly speaking, our stations and trains needs staffs to assist passengers whatever their circumstances, because their presences at all time will be great idea, which will safe jobs, rather than, creates unnecessary unemployments, company image, and as well, will promotes safety/security for all public users!

So, am in support of keeping our colleagues at stations and on board the trains.

Regards;

I have just read your report and feel that as I have disabled relatives that as many staff as possible are provided for assistance at stations and on trains. These people must be trained to a safety critical standard to cover all possible scenarios. Too many stations and trains are currently unmanned and I think vulnerable people should get all the help they can get. Everyone is equal and should be treated as so and should have the right to turn up and travel. Having to book in advance does not cover all situations and discriminatory behaviour should not be accepted in any society.

I think there is a great need for help to get people who need assisted travel on our trains and stations , in my opinion getting rid of this would not only be a travesty But there are so many people that use public transport that need assisted travel If it's removed it must be a infringement of their human rights

We need more staff on stations and trains including more security to make passengers feel safe and deal with any incidents and enquiries they may ask, and do the job more efficiently.

As a technician working on train maintenance I know how important it is to have a guard present to aid maintenance control with basic fault finding, to prevent cancellations and delays.

I have recently read your consultation document "Improving Assisted Travel" and would like to make the following points:

There is currently a nationwide "campaign" from Train Operating Companies, to introduce Driver Operated Only services, thus removing the *safety critical* role of the conductor.

Having a safety critical conductor on board *all* services is vital, to ensure that passengers/customers can travel by rail in the utmost confidence. Should there be an emergency? Only a safety critical member of staff can safely evacuate customers from the train.

In my opinion, it is imperative that the current staffing levels on Trains & Stations is at the very least maintained, if not, increased. It is these very staff that offer & provide invaluable information, advice & security to *all* their customers, not least, disabled, elderly & infirm.

There is already a technological disadvantage to many of these customers, who may find it difficult to purchase train tickets from other sources other than at a station.

I hope you will take these points on board & ensure that it is customers *not* shareholders & owners that benefit from this vital service.

I am in full agreement on your policies to retain staff such as railway guards to help/assist passengers

My name is [REDACTED]. I believe It is vitally important to have staff not only in stations but on trains also and can't understand how this can be overlooked to cut cost. A close family member of mine is in a wheelchair and on entering and leaving train carriages there is no doubt she will suffer badly as a consequence. I feel it's imperative as a union to stand strong and do what's right.

Being a mobility impaired adult I feel more secure with another person besides the driver on board any train that I travel on. Several times I have travelled on my local service into Glasgow where there has been no-one to assist and some of the gaps between the train step and platform leave me very insecure. I have had to rely on fellow passengers to help me off by offering their arm for support due to step being so high.

I also travel South on Virgin Services where I can book assistance which is always there for me, but find this very lacking on other services.

PLEASE KEEP THE GUARD ON THE TRAIN.

In my opinion it is vital for trains and station areas to be kept safe and this can only be achieved with staff to help the disabled and vulnerable and are a visible point of contact and security

Dear Sir/Madam,

Proposals to leave rail passengers with only the driver necessarily on board will deprive many of the assistance and advice crucial to the safe and convenient completion of journeys. As a civilisation we should oppose any changes which make train use less safe or less accessible.

Please retain all safety critical staff on stations and on trains

There should always be staff at stations and on the trains a must for everyone's safety

Hi,

I work at Newcastle central station and have worked within the rail industry for nearly 23years, and we desperately need more staff as the amount of assistance jobs we have for disabled passengers has gone up tenfold, disabled people need our help to travel safely and they should never be discriminated because of any disability they have, I support this petition 100 per cent

Dear Sir, Madam,

I am writing to you in order to request more staff at stations and on board the trains.
The reasons are for a customer service point of view but also for safety reasons. They need to be present at all times.

Dear Sir/Madam

I am writing to you to add my name to the petition against DOO operation at Northern Rail, which would result in active discrimination against disabled people, & would also therefore actually be illegal. This is 21st century Britain, and we are - allegedly - a caring society, with firmly rooted beliefs in social inclusion for all. Heaven forbid that those individuals at DfT that would force this insanity upon the rest of society have disabled relatives and friends who would find themselves similarly discriminated against with such unbelievably draconian and insane legislation. If such faceless individuals really are so sure of their ground (& their own morals), then why not leave it to the great British public at large to decide? Aah, but that's not about to happen though, because as always, HMG knows what's best for us, & we had all just jolly well better get on with it - yes, well shame on the lot of you, I say.

Yours sincerely.

I strongly feel adequate staff should be provided on all stations and trains and the disabled have every right to assistance and go about there daily business as much as anyone else

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

Dear Sir or Madam,

I am writing in response to your consultation on Assisted Travel.

The basic principle of equality for people with disabilities is that they should be able to access public spaces and transport on the same basis as those of us who do not have a disability. As your report points out often the only way assisted travel is available is by booking in advance sometimes up to 24 hours beforehand. Even when assisted travel is booked it is not always available partly or entirely and if it is only available in part then it is as bad as not being available at all.

Having to book in advance is a restriction on the movement of people with disabilities and although rail operators are required to provide assistance for 'Turn up and go' this is only where it is 'reasonably practical' but the lack of staffing particularly in the evening means that 'Turn up and go' is not possible for an important part of the day. I live near a busy commuter station but the booking hall closes at 8pm and there are no staff on the station after that time. This is the time that many people go out for the evening. Those of us who do not need assisted travel might decide to go out on the spur of the moment or in response to a sudden invitation, but that kind of spontaneous decision is not possible for those that do need assistance.

Providing the station platform is accessible that might be ok with the new computer and app system coming in later this year as long as there is a guard on the train. Yet it appears that rail operators are increasingly trying to bring in Driver Only Operated trains so there is no guarantee that there will be someone on the train to help someone onto and off the train or to provide assistance and some safety and security during the journey. With DOO there is also a question as to what staff will be available even if assisted travel is pre-booked as it is obvious that one of the key advantages of DOO for rail operators is the opportunity to reduce the number of guards or eliminate them entirely.

I believe that people with disabilities should have the same rights as everybody else and that includes being able to travel at any time when trains are running without having to pre-book. That requires above all sufficient staff being available to make assisted travel a safe and reliable reality.

Yours sincerely

Dear ORR,

Having read your consultation document on assisted travel I wish to highlight the issue of proposals for Driver Only Operation (DOO). In my opinion passengers are safer with a safety critical guard on board. as well as staion staff. This is also of great importance to to groups such as the elderly, vulnerable or disabled.

Please take on board my concerns and ensure that these staff are retained and that the same access to rail transport can be provided to all groups of society.

I have read the consultation document "Improving - assisted - travel - consultation" and would fully support the aim to "empower confident use of the railway by all".

With this aim in mind I am very concerned at recent trends to increase the number of Driver Only Operational trains. Likewise the cutbacks in staffing levels at stations - and even leaving some totally unmanned.

Fully trained and qualified personnel need to be available at all times in order rail transport can confidently offer a safe service for all citizens, and also be capable of quickly responding to unforeseen situations. Since the reduction in staffing levels I have felt less safe traveling by rail, as have the disabled passengers I have spoken to and I have now discouraged my elderly mother from traveling by train. On one occasion recently, I even had to alert platform staff that there was a disabled passenger using an electric wheel chair in an un-staffed guard's carriage who needed the ramp to exit before the train was dispatched.

I am afraid to say, my confidence in train operators motives have sunk so low that I consider it no coincidence that the availability of the assistance to travel by train scheme is so poorly advertised.

I consider myself fortunate my current state of health is such that I can use the railways unassisted but am always aware my personal state of health is never guaranteed (so that I always will be able to continue to do so).

for security and safety reasons we need guards on trains and staff at stations at all times.

I use bickley station I am against your proposal

Please do not risk my teenage daughter's safety or mine. As a disabled older woman I feel vulnerable enough as it is. My daughter and I want staff on stations and trains.

Regards

I cannot put into words the absolute necessity for Station staff to be available at as many stations as possible and on ALL trains.

I have several close friends who have disabilities, one being blind, who's rail travel would be severely curtailed without staff assistance.

The fear and uncertainty would prevent their ability to travel.

This would be a dreadful situation to over 13 million registered disabled people, and staffing levels must be kept, and in many cases increased, to ease the burden and fear on disabled rail travellers.

I travel on trains everyday and many off the stations along my route are shut or open only part time everyday guards on trains provide people with information, tickets and assist people with disabilities. Keep guards on trains they are essential.

Hi

I would like to express my concern about guards and platform staff being withdrawn from trains.

My family depend on trains on Cornwall and my elderly in laws and my disabled nephew would not be able to use this public service without these people and this assistance. With the current emphasis on lonely people please consider how important it is to have access to these services especially with assistance at ALL stations.

Regards

we Need staff on station platforms.without a helping hand passengers will be left without anyone to help them in a time of need. disabled passengers are most at need

I feel it is essential that no train operates without a dedicated safety train guard. People with disabilities should be allowed to travel whenever they like just as anyone else does. This can only happen if trains and station platforms are always staffed properly with the appropriately trained staff. Please do not continue to undermine the service offered to the people who need it most in our community by extending DOO. It may have been declared safe but it is disingenuous to claim that less safety trained staff equals a better service.

Assistance. Security. Mobility. Comfort. Value. All simple stuff. Common sense and decency must prevail. On train staff and station staff are 100% essential. This is not a third world country. We have the resources. When I buy a ticket I want to be safe and secure in the knowledge that I will be looked after in all eventualities.

I write to you today with regards to the Staff on trains and stations having experienced emergency situations whilst travelling.

Whilst travelling from Scarborough to York back in 2013 our train came to a sudden stop. Minutes later an announcement came over the public address system asking if there was a doctor on board?

It later emerged there wasn't, however, three nurses were travelling for weekend out to Manchester and answered the call.

We were informed that the driver had had a major heart attack and the three nurses saved his life. But if there was no conductor who made the announcement, who would make the call if it was driver only?

My family have also encountered events whilst travelling where passengers have needed immediate medical attention, again the conductor has liaised with the driver to arranged emergency services to in situ at the next stop. Plus where Police assistance is needed due to dangerous or violent passengers.

When I was informed by my local train operating service, Northern Trains that they are going driver only alarm bells rang out. I speak to conductors on a daily basis and would feel reassured whilst travelling that I have a point of contact in an emergency.

I urge to act on these plans in the interest of public safety and also job security over profits.

I was recently informed by my Welsh friends that Arriva Trains Wales have not bid for the new franchise, because the first Minister of Wales, Carwyn Jones has stated that trains in Wales must have a Guard/Conductors. What a sensible politician he is.

I Thank you in anticipation of your efforts and please take my occurrences in to account for the safety and wellbeing of all of the travelling public.

Dear Sir,

I would like in the strongest terms oppose the decision to have Driver Only Trains. This is a clear violation of health and safety without some form of guard present on the train to deal with possible emergencies . I have several friends who are disabled . who rely on this service also.

I would like to see more staff, not less, on trains and at platforms in general.

Sir,

I have recently be made aware of you consultation on assisted travel. I am contacting you on behalf of my 75 year old mother who has mobility issues, using a wheelchair or small mobility scooter, and is a regular user of Southern Trains.

As I am sure you know Southern Trains have scrapped guards from most of their trains, and as a result my mother has on a number of occasions be left to get herself on and off trains, something that is a major struggle with her wheelchair and impossible if using her scooter. Thus far Southern Trains claims that their will be someone, not a guard, on the trains to assist have proven to be false. Recently on a trip from London not only was their no one on the train to assist, but upon arrival in Brighton the assistance that had been booked prior to departure failed to arrive. My mother was assisted from the train by other passengers. When she approached the station manager to complain he just brushed her off with a "Well, that's not very good is it!"

This is just one example of many. Indeed my mother is now reluctant to use the trains as she cannot guarantee she will be able to complete her journey. And heaven knows what would happen should there be a fire or accident on the train. It is all very well our corrupt MP's saying that passengers will get themselves off the train in a fire, but some simply cannot do so.

I don't understand how it can be claimed to be safe to have just a driver, in the event of an accident who is looking after the passengers? And if the driver is looking after the passengers then who is looking after the train? On the rare occasions when there is one of these new people on board what use are they without proper safety training? What will they do, stand and just watch events unfold with the rest of the passengers?

Plus it is not just trains that are being abandoned, you almost never see anyone in the ticket office anymore. What use to a 75 year old is some well intentioned guy from G4S who cannot sell you a ticket, knows nothing of ticket restrictions or even the best routes to get somewhere, but will stop you getting on the platform until you have been ripped off by the ticket computer which offers several fares for the same journey but never tells you which you actually need!

Train tickets are now more expensive then ever, but we are getting less for our money. And to call the removal of provision for elderly, vulnerable, and disabled people 'Modernisation' is gross hypocrisy.

Thank you for your attention,

Dear ORR

Having read your consultation regarding improving assisted travel, I believe that the continued reduction in staffing levels across the rail network whether it be in stations or on trains is to the detriment of those who are most vulnerable in society.

Equality means that everybody in society should have the same opportunities and for those requiring assistance on trains that does not mean having to book in advance or run the gauntlet of hoping you might be able to get on a train in the hope there may be somebody there to help you. Guards and station staff are crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

Regards

As you are no doubt aware there are currently a number of proposals introduce Driver Only Operation on trains.

I believe that passengers deserve more than just a guaranteed driver on a train and that as a minimum there should be a fully qualified and safety critical Guard, as well as the driver.

I believe it is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

I hope you will take on board my concerns and ensure that these essential staff are retained so that my family and I can have the same access to rail transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and safely.

Thanking you in anticipation

I write to say "YES" I think it is VITAL that there are staff on trains, to assist vulnerable people and passengers with disabilities.

We are proud to be an INCLUSIVE company, therefor we HAVE to provide inclusive travel opportunities for EVERYONE, regardless of ability and protect their vulnerability.

It is not ok to discriminate and take away opportunity of rail travel to ANYONE, if we are inclusive, we must include everyone.

Staffed trains offering assistance and platform staff to offer the same principle is vital.

Please, lets keep the Guards on the trains for safty sake and lets use common sense.

I pledge my support for maintenance of staffing on train services and at stations.

Public Safety is paramount as STANDARD REQUIREMENT and oppose any government pressures to reduce

Those accordingly.....

We are in the grip of reductions concerning POLICING, HOUSEING, and healthcare etc,,

Therefore support any and every effort to supress governmental voyeurism.

End of message.

The guard on a train there for a reason.why since railways begun have we had them???.how do we make more profit yes get rid of the guard and station staff.where does the profit go?? Not back into the system into big pockets

My mum is wheelchair bound and having assistance at station is essential

I have elderly parents and I am very concerned train operating companies are using Driver only trains or seriously considering it. Whilst the statistics may say DOO is safe, the reality is that it can be a nightmare for elderly and disabled passengers. I know Driver only has been around for a long time but it's only in recent years that there are less members of station staff. They might be able to start their journey at London Victoria but what happens if they want to go to an unstaffed station.

I also object travelling on GTR Southern and on several occasions have not had my ticket checked. What happens to the fare evaders? They get away with it.

I hope you ensure assisted travel is guaranteed and train companies provide a better service

Must keep guards on trains

I was the last year of British Rail apprenticeships as a cat4ci fitter and I travel regularly for both work and recreation and several times I have helped the gaurd who single handedly is expected to aid any passenger who requires aid on trains of 1 car length to 12 cars. A lady who was assaulted watched as the aggressor was taken away by the BT police at the next station and she thanked us both so another example of a simple train managers worth.

We need staff on stations and on train for Safety issues and human help

Staffing on trains is critical for the H & S of the vehicle, the passengers and quality service delivery! In addition at this time where the UK is facing a severe threat level to national security from terrorism, it is essential that transport and services are monitored. It would be irresponsible and poor management to have drivers lone working, with no physical support

I support keeping conductors and drivers

I frequently travel by train and there are always passenger issues arising, the role of the conductor in managing some times sensitive issues and welfare of passengers, resolving disputes, this role cannot be underestimated

I have read your documentation and very much welcome your vision for equal rights to travel by all ,no matter what disabilities that person may have .

I believe in keeping the Guards on trains.

Dear Office of Rail and Road,

I recently read your consultation document on your website regarding assisted travel and very much welcome that you state that your vision "is to empower confident use of the railway by all".

As you are no doubt aware there are currently a number of proposals introduce Driver Only Operation on trains that I feel will severely impact on this, especially if - as I fear - the long term result will be a majority of trains operating without a second member of staff on board.

I believe that passengers deserve more than just a guaranteed driver on a train and that as a minimum there should be a fully qualified and safety critical Guard, as well as the driver.

I am aware that Train Operating Company's are giving an assurance that most services will retain a second member of staff but do not believe that long term this will continue, as the constant striving to reduce costs and increase efficiencies will lead to a substantial reduction in staffing levels (an operator's biggest financial overhead).

Additionally, unless that member of staff is fully safety qualified he or she will not be able to intervene in an emergency, potentially putting lives at risk.

I believe it is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

I hope you will take on board my concerns and ensure that these essential staff are retained so that my family and I can have the same access to rail transport as everybody else, to be able to go where everyone else goes and to do so easily, confidently and safely.

In closing I would point out that history is littered with short term decisions - especially affecting the railways - that with the benefit of hindsight were found to be at best misguided, and at worst huge mistakes.

Thanking you in anticipation

I understand that there has been a lot of concern about the removal of train guards on trains. In my own personal opinion I feel that it is very important to have a train guard available on ALL trains for the following reasons;

As somebody with a disability I have found it essential to have a train guard on board the trains. For people with limited mobility they need help to get on and off the trains, and as reported a number of times in the papers a lack of train guards means that there is nobody available to assist these people during the journey. This is actually discrimination, and disabled people have just as much right to travel on the trains as anybody else. In my own case, having an anxiety disorder I suffered a panic attack once because of the train getting so crowded and the train guard on duty was fantastic. Without him, I wouldn't have completed my journey.

In light of all the recent terrorist attacks, do you not think that removing train guards would be a serious safety issue? These guards are not just on the trains to check tickets, but to assist the train driver if there has been a report of something having been seen on the train line, act as a safety net for people who may have been for example assaulted on the trains due to drunken behaviour or other reasons. Be there to check luggage if there has been a security alert. A train driver is unable to do these things alone!!!! I sure as hell wouldn't feel safe without a train guard!

Please consider what I have said, because quite frankly I don't think I would ever consider travelling on trains again if this vital safety net is removed all because you want to cut costs.

I think one of the most important things is to keep guards on trains. This is essential for passenger safety and assistance.

I would like to see more staff on the trains , and at platforms because of the difficulties I have encountered whilst traveling on the underground over the last few years in terms of getting help and assistance when needed

Keep the guards.

I write as Attorney on behalf of our daughter, who has learning and physical disabilities - in other words disabled and extremely vulnerable.

Last year, we travelled from Mid Sussex, to see a Sunday matinee performance of the Royal Shakespeare Company at The Barbican .
Our journey to London necessitated a wheelchair, which meant that if the gap between the train and the platform was large, we would require help from the station staff.
This was a no problem on the outward journey, but our return was a very different experience.

We arrived back at The Barbican station and made our way to the platform via the lift, only to find that when our train arrived, there was a huge gap between train and platform - and no-one to help me transfer our daughter on to the train.
No station staff - and certainly no train staff.
There were no other passengers on the platform - and none visible when I called for help into the train.
So we had to let the train go without us.

I then immediately started investigating every room and space in the area, to find a member of staff - there was no-one.
I did locate a telephone on the platform which advised that "customers" requiring a member of staff should telephone the number given.
I did this; the call rang and rang but was not answered.
There were no staff to be found - anywhere on the station premises.
At that point I concluded that we would have to abandon travel by train and return to the street and find a taxi.
To say the least it was a very harassing and unnerving experience - and one I would NEVER risk repeating.

This was a journey like all the others I have made, where Disabled Assistance had been arranged. It has failed us occasionally in the past, but there have always been station or train staff available to assist us.
I do not think any disabled person should contemplate rail travel in future, if trains do not provide a member of staff to ensure safe travel; especially as so many stations now are unmanned for considerable periods of time when trains are still running.

The current service is excellent when the staff are available - without staff, there is undoubtedly discrimination against disabled would-be passengers.
Also, if an incident occurs, even very fit and able passengers are put at risk, if there are no staff available to raise the alarm and/or intervene and assist directly.

At the moment, the train companies are requesting that passengers should talk to anyone looking distressed, in order to try and avert a suicide.
A classic example of where support and intervention by station staff is critical.
How can any passenger, totally alone and unsupported, be expected to make a realistic intervention in such a situation?
It is wholly unreasonable.

Our experience has left me in no doubt.

If train companies wish to run train services - they MUST provide a service to the whole population.. Disabled people are often taxpayers too; they are entitled to the same transport services as the rest of the population.

I work on the P.way as a track quality supervisor for NWR and I strongly feel that driver only trains is a disaster for all passengers traveling on our infrastructure ... passengers should have the assurance that staff are there to help ... I've witnessed frightening scenarios on trains where passengers have needed assistance by guards and staff and they have been looked after and assured in the situations they've been in ... even the smallest assistance from a guard or member of staff helps prevent a bad situation arising ... it's common sense to look after and assist our passengers ... I hope my view on this helps sway us away from a unsafe experience to a safe pleasure to travel on our trains..

Having read the consultation on the future of staff on trains, platforms, etc I have some real concerns at the future lack of staff on Trains and platforms along with the lack of staff within the train stations.

I feel that you should take some time to maybe listen to the paying customers or the public that pay to use the service.

Security should be one of the main concerns along with safety, having someone who walks the trains all the while they are running is very important someone who you can rely on if someone is being a nuisance whilst you are travelling, having staff who you can get information from if your uncertain.

The traveling public deserve so much more than just a driver, the elderly or the disabled should be able to travel without fear, children should be able to travel without fear, the most vulnerable in society should be able to travel without worry or stress.

I would hope that you would be looking at more staff being employed and working within our stations and trains not less, I hope that you will take note of my concerns and send a positive answer back, here to safe travel without any discrimination .

please please could you ensure that we continue to have a guard as well as a driver on trains they are vital to assisting us disabled people on and off the train as well as help whilst on the train if guards are removed that will take away my ability to use the train and affect my human rights as a disabled person my independence taken away further as I use the train on a regular basis may I add the guards are amazing helping me and making me feel safe and secure in my journey as I travel on my own if the removal of guards goes ahead I will stop using the trains and start a petition for the rights of all single travellers who feel vulnerable without a guard and people like myself disabled who will have their right to use the train taken away without assistance which is unacceptable !!!!

I support the use of at least 1 safety critical guard and 1 driver on every train. Thanks,

Dear ORR

Just an e-mail from me to disagree with your view on driver only trains. I believe that there should be guards on all trains at all times. Passengers deserve the reassurance that there is assistance at all times should they require it especially those travelling alone who maybe are a little older or vulnerable or even disabled. I myself as a frequent train user would feel more at ease knowing that help was at hand should I require it especially at night. I hope you will take on board my concerns

I work for GA on the Shenfield to Southend/Southminster area where we have no station staff apart from at Shenfield and Southend only as they were done away with from our previous employers National Express in April 2009.

We do have a station care team who's job is to travel back and forth to deal with MIP's and VIP's and get all the pre booked disabled customers on and off the trains. They do have other jobs to do in between these bookings but they are expected to meet with the disabled customers to get them on and off trains.

Unfortunately other parts of our company does not have this team and rely on conductors where they're employed or other customers to get them on/off trains.

Company council Rep

Dear ORR,

Assisted Travel Consultation

I write with reference to the above consultation and welcome the opportunity, which this review presents, to provide some personal input in the hope that my submission may aid long term improvement regarding assisted travel.

As a wheelchair user who frequently uses the local and national rail network, I find it astonishing that rail operators have been allowed to propose a Driver Only Operated (DOO) system on services they provide.

Not only would this industrial strategy, which appears to aim at increasing the profit margin of train operators rather than improving customer service and satisfaction, indeed such a policy would have a detrimental effect on wheelchair and non-wheelchair users as they attempt to access the rail network to move as quickly and conveniently as possible from one destination to another.

In the Executive Summary you note that there is a substantial increase in the number of requests for assisted travel, up 4.4% in 2016-17 compared to 2015-16. You also note that this figure could be considerably higher given the number of people who do not book assistance.

Using your own figures it makes a mockery of the notion that driver only operated trains would provide an effective service taking into consideration a large number of local train stations are unmanned due to staff shortages, while other local stations are manned infrequently.

This leads to a point concerning the local station that serves the area I live. When the station is unmanned, normally from 9.00 pm midweek, slightly earlier at weekends, the lift allowing access from the station is switched off. Of course, for wheelchair users, this is a restriction; restrictions that may be felt by many members of the community who are elderly, visually impaired or have small infants who still require a buggy.

As a wheelchair user often using the local station into the city centre, there is a problem given the number of people employed by rail network. In Glasgow Central Station, for example, there are four people covering fifteen platforms. Given the broad spectrum of people who require assisted travel, these staffing levels are completely inappropriate, often leading to delays for consumers on the completion of a journey. This is a problem that I'm sure occurs throughout the rail network, particularly, in our larger stations.

Recently, on a return journey from Bonn, I would have had the humiliating experience of missing out on two trains, if not for the assistance of fellow passengers.

Although the journey from Kings Cross to Edinburgh was booked well in advance, when at King's Cross I was told there was no space on the train. This is a capacity problem as rail operators only provide space for which they are legally obliged. Space on old rolling stock, I might add is completely inadequate, yet the rolling stock is still in use. What next will poor Parliamentary legislation allow train operators to get away with, putting wheelchair users in the postal compartment!

I have to agree with the *Monitoring* feedback that surveys have provided regarding 'reliability of assistance or staff helpfulness'. On a number of occasions, I've made a journey from one station to another and found there was no communication between departing and arriving station. Yet, I've been informed on each occasion by a member of rail network staff that they would make arrangements for exiting the train.

Although I have no view on improving awareness to others regarding Assisted Travel, the methods the review suggest will go some way to broadening the awareness of assisted travel rail network users. However, as noted above, if the demand for assisted travel continues to rise, this will not only put pressure on the

number of staff presently employed throughout the rail network; an increase in assisted travel will also lead to an increase in demand for accessible space on trains and no doubt lead to a refusal by train operators to allow passengers to take a journey at a time of their choosing. An experience no other rail network user would have to go through?

If there is no 'cross-industry protocol to achieve a seamless end-to-end journey' why has it took this particular consultation to suggest such a policy?

In terms of improving assisted travel, part of the problem has to do with old and recently purchased rolling stock and the ability of a rail carriage floor to meet the platform.

There are many examples in the UK where recently constructed underground transport provides roll on-roll off ease of access for rail passengers. The same can be found in a number of non-underground stations.

There are many examples in Germany and other mainland European countries of rolling stock meeting the level of the platform for passengers.

In these examples, this improves passenger use on our rail network for many social groups, wheelchair users, elderly and new parents.

One can only suggest that part of the problem lies with the procurement process.

I look forward to further developments during this consultation process.

As a senior citizen and frequent user of the railways I wish to lodge my strongest concern at the possibility of removing guards from the trains. I recently joined in the industrial action at our local station, not only to support them, but as a passenger expressing a view that to take the guards off the trains quite frankly would be insane with a tragedy waiting to happen

The highly trained guards are not just door openers and ticket collectors, they do other tasks with the health and safety of passengers as their top priority on every journey. They work as a team with the drivers whose role is to drive the trains at very high speeds. It is not the responsibility of the drivers to be concerned as to what is going on behind them in the carriages if there isn't a guard on duty. Will it mean the drivers will have to leave their cabs to assist wheelchair passengers and mothers with pushchairs to get on and off a train if they are at an unmanned station? At the moment, the guards will assist with the ramps to enable passengers to alight and embark at the station. There are some stations where there is a large gap between the train and the platform and announcements to "Mind the gap" sound the airwaves.

The guards provide a valuable service to all passengers and the possibility that we could end up with DOO should not even be under discussion. I certainly would not travel without a guard on board at any time of the day or night.

Dear ORR,

I am a wheelchair user and a regular train passenger. My local station at Drifffield (Arriva Northern network) is unmanned for the first train of the day and after 1:30pm. I therefore rely on the guards on the train to be able to get on and off. It is often not possible to be able to plan times ahead and book travel unless I am going long distances.

As you will be aware, Arriva Northern are currently in dispute with the RMT over their plans to move to driver only operation. Arriva are planning to run some services without a second member of staff. I speak to a lot of guards when I am travelling and to a few drivers who are travelling to work. The drivers I have spoken to are not happy about the prospect of being the only person on board as visibility at our stations is poor at times.

As a disabled person, I have had numerous occasions where I have been stuck onboard trains when booked assistance has not arrived or when bookings have gone wrong (they've been put down on the wrong date). I value the guards and knowing they are onboard the train means I can travel. I often have to take early trains to get to business meetings in London and it is essential that I can be certain to have a guard on the train as station offices are often not open for me to book into if I have booked assistance.

Another worry is that some rail companies have said that trains will only run without a second member of staff if they don't turn up at the last minute or get left behind at a stop. Surely this is an admission that drivers operating the doors can't manage to keep track of the platform. If I was on a train and the guard was left behind at a station, I would then be stranded on the train at my destination.

My independence is at stake. I, and other disabled people, need the guards to be able to have the equality of opportunity for travel that everyone else has. Please ensure that driver only operation is halted.

I am registered blind, use a long cane and have very limited visual field. I also have a significant hearing impairment.

I usually book assistance for main-line travel when I buy my ticket.
Telephone booking system usually works well and email confirmation is helpful.

Assistance at departure is usually Ok once I have found where to report.
Not always good feedback on what is happening.

Help on train and arranged help disembarking sometimes doesn't arrive.

Help at stations away from London varies from excellent to non-existent.. It depends entirely on the quality and helpfulness of staff. I wish some of them could be pushed off a train in a station they don't know with a blindfold on- they might get some idea.

Trend seems to be towards destafing- it is sometimes obvious that the assistance is being given by someone who already has a lot to do getting trains in and out safely.

I recently saw an example of assisted travel at my local station - Erdington. A person of some age and I think some cognitive difficulties was being seen off on a journey and was supposed to be assisted at Birmingham New Street to change trains. Those with her were not able to get confirmation that the assistance was in place, which was worrying for them all. It did make me think about the anxieties of travel for people with disability of whatever kind.

I'm pleased that you seem to be intent on increasing awareness and training on this issue, but I do think you need to consider staff numbers, and especially staff on board trains. It's no use having lots of lovely awareness and training and good intentions if there is no-one available to do the actual helping.

There are currently a number of proposals introduce Driver Only Operation on trains. Who can then help passengers? It is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not fewer staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and reassurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

It is essential that all the help required is given

We want staff on stations and trains!

Dear Sir, Madam

Assisted Travel Consultation.

Just to give you a quick idea of the issues I have seen and had. I am registered disabled (mobility impaired) and I am also guide to my husband who is severely sight impaired. I am within the Greater Anglia area but have used other Train Companies around the Country. I have booked assistance every time I travel and to be honest at least 90% of my booked assistance is either ignored or just doesn't materialise, in fact on the local branch lines it is none existent.

I have witnessed a customer with clear learning difficulties and also severely sight impaired poorly treated and forcefully shoved into a rear facing seat which he didn't want. In fact the same evening I went to the same station office to let them know we had booked assistance and was told it was flat enough and should make my way over the overpass to the platform and get myself on! My husband was very angry and we did write in and complain and we did get our ticket refunded for that part of the journey but no apology.

I have also been on the receiving end of a very aggressive conductor. I have had faulty ramps to get off a train (very scary) I was also put on a D.O.O train and had no assistance to get off as the station was unmanned. I also was met at the same station (Three Bridges) on another trip to be met by a member of staff who said I should have been met at Gatwick and put in a taxi to Three Bridges as the lift was out of action. My husband has through poor training of staff, missed his footing on the steps and ended up with his foot going down between the train and platform. At Gt Yarmouth I have seen two severely sight impaired ladies taken to the train and told where the door was, one poor lady had a guide dog. They had to feel her way along the side of the train to find the doorway and try step up the steps to get on, the poor guide dog had to belly flop to get on board and it really struggled. There really has been far too many incidents of this nature I have experienced or seen. I have bitterly complained to the companies but nothing changes. I even witnessed staff rolling coins around the concourse and laughing at a gentleman with clear learning difficulties chasing the coins around. I complained to Management that it wasn't appropriate behaviour but was told it was "ok because the gentleman enjoyed running after the coins".

I must also say that often the language staff use is unacceptable like we've got "A Wheelchair" or "blind assist" or even a "VIP" (not a very important person but visually impaired person) on occasion I have been refused to a "buggy and ramp" we are still human beings with feelings it depersonalise you.

In answer your questions please see below.

1. How can rail companies improve the way assisted travel information is given.

This could be done with good advertising at the station or booking hall, or maybe local radio and tv. To be honest I think at the point of booking staff should be made to ask if the ticket is for a disabled person and the same way they are supposed to ask if the person has a rail card of some kind. Or if they are booking on line something similar. Booking assistance should then be done for them. Even using advertising on social media.

2. Are there any reasons why information should not be in plain English.

No there is no reason why it cannot be in plain English. But do not forget not everyone can read.

3. What should railways do to make thier websites more accessible?

This could be make them easier to enlarge or have a large print ability available. Maybe an easier to understand. But also remember not everyone can read, or opporate a computer.

4. Social Media?

No comment

5. Should Rail companies give information on assisted travel with one click from thier websites?

Yes this is a good idea for those able to read it.

6. Should people be able to book assisted travel at the time of booking their ticket?

Yes they should be able to see above reasons.

7. How can rail companies make more people aware of assisted travel.

See above 1

8. How can rail companies work more closely with organisation who work with disabled people?

Ask their advice and **LISTEN** to the replies. Also unannounced mystery shoppers.

9. How might we improve the way information is passed from one station to another?

Make this mandatory if assistance is booked or asked for it should then be communicated via telephone or computer with this being acknowledged by the next station and fines on the companies when this fails. I must also say that the booking assistance be clearer in what the personal needs of the person are.

10. Would new rules for rail companies make the service better passengers who need the Assisted Travel Schemes?

I think this may be a good idea if this was implemented nation wide and mandatory

11. Should rail companies refund the cost of the journey if assistance does not work properly?

Yes I do think this may be a good idea but I think this should also cover the cost of maybe having to get a taxi from somewhere else if it goes badly wrong. I also think an apology and possibly compensation where their dignity or human rights have been affected, for example a disabled toilet out of action.

12. Should rail companies write their own policies for giving passengers compensation when Assisted Travel Schemes don't work?

No never. This should be a nation wide standard as often many journeys cover more than one rail company.

13. How can different railway companies give the same good training to their staff?

Make the training a standard requirement for all rail companies across the country that every company has to follow with no exceptions.

14. How often should disabilities training take place?

This should be done at the beginning of employment and refreshers 2-3 yearly or if a complaint of disability discrimination has been reported by the customer.

15. Should there be rules about including disabilities training in staff training programmes?

Yes I think it should be mandatory and to be honest I think staff should be encouraged to do things like learn sign language or other special needs training.

16. Should there be agreed standards of disability training for railway staff?

Yes this should be standards across all the companies.

17. What information should be collected about how the Assisted Travel Schemes are working?

This should be the nature of the complaint assistance not being supplied or aggressive staff and most importantly the stations where this happens, that way penalties and fines can be implemented. A little like the league tables much lamented by teachers and hospital staff. Also a reward for stations and companies with excellent assistance records.

18. How should we get better at checking that Assisted Travel Schemes are working well?

Ask disabled people.

19. Are there any ways that we could use new computer systems to check how Assisted Travel Schemes are working?

Maybe if it was a nationwide system for people to access with ease, with independent people running it?

I do hope you are able to change things for those of us who are disabled to travel easier and not made to feel like we are a complete pain. Also a way to change the language of staff, for

example referring to a person in a wheelchair as "we have a wheelchair" Or we have a "Blind Assist" we are still people after all.

Warm regards

Improving Assisted Travel: a consultation

Response of a frequent wheelchair user of trains who books Passenger Assistance.

Whilst some journeys go without problems, the current system is not improving with numerous issues for many journeys particularly those involving a connecting train. Whilst some TOCs are very good at putting their onboard ramps down when this happens, I have only been able to catch the next train by crawling on, and dragging my wheelchair behind. I have had to crawl off several trains in the past 6 months when assistance has not showed up within 10 minutes. There is confusion to whom I should book with as it involves 2 or 3 TOCs trains, 2 different TOCs and Network Rail whose stations I use. There are issues with booking the wheelchair space on one TOCs train, where 6 months ago there were rarely issues with reserving it. The TOC who operates this train responded to a complaint about this by stating I should book with them. It makes the whole PA process longer when the booking is refused. This train has fold down seats for the Wheelchair space, which causes huge issues on peak time trains. I have to leave a public body committee meeting early, often making it non quorate simply to get home without abuse, and being used as a piece of train furniture and hit constantly by bags. There are issues with even the busy earlier one when people are asked to vacate the seats. Others can book seats on this train, why can't the wheelchair space be booked? On complaining to the TOC I was sent a response from a standard template telling me to book the next journey with their passenger assistance rather than that of the first station or first train that I normally use. On the latest journey the one wheelchair space plus half the aisle was full of large luggage, blocking the way to the disabled loo and one exit door. It was like being back to the guards vans of 25 years ago! The TOC was not interested in telling me why it treats wheelchair users as luggage. Often I cannot travel on the train I want due to insufficient wheelchair spaces on the East Coast main line. How can we function in society we cannot use the train service like other passengers? I waste many hours a year booking assistance only for there to be major issues 70% of the time. What shows up on the stations PA list is often not what the PA confirmation sent to me, and originally asked for states.

Your questions

Chapter one - Raising passenger awareness

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

Posters and leaflets in racks. Cards for station assistance staff to hand out to passengers requesting assistance without booking on the day of travel.

Making sure that PA delivers 100% of the time when booked. My recent experiences mean I wonder why I bother wasting my time trying to book wheelchair spaces and assistance that either due to problems with the system between different TOCs mean that the space is not booked, even though other passengers can book seats/ or you are left to crawl on and off trains as the assistance sheet at the station has you down as needing assistance with luggage from a carriage at the other end of the train not ramps for a wheelchair

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

No, but remember to make all literature available in large print and easy read for people with learning disabilities or whose first language is not English.

Q3. What steps can be taken to increase website accessibility?

An Passenger assistance App would be helpful, but make sure it is easy to find PA on your main web site, for many TOCs you have to spend ages searching just for the phone number. I usually have train tickets bought and sent to me by those I travel for, often making it impossible for me to book the assistance online depending on the TOC

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Try and get people who use PA to Tweet etc. It may improve the service if all the missed assistance and availability of wheelchair spaces was broadcast!

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Yes, try to find it! Why as a disabled person should I have to spend large amounts of extra time just navigating pages of often small type looking for a link. It is not even called the same name by all TOCs

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

No it should not have to be linked to buying tickets, apart from Advance tickets.

Wheelchair users can have huge problems in taking advantage of these tickets if the wheelchair space is not available. Even if booked linked to ticket buying there is still no guarantee. Not having the right ticket for another train is expensive.

I get most train tickets sent to me by organisations who I travel to meetings for. If it had to be linked to buying a ticket PA would never get booked. Some disabled people can get discounts on full price tickets with out a railcard on day of travel this discount only seems to be available via ticket offices. If I am buying a non advance ticket myself, there is no point paying in advance. It helps cash flow. Sometimes the decision to travel will not be known until the day before or later and until tickets or if the disabled person is able to use a E ticket on mobile, many may not, there are issues getting the ticket. We cannot all use ticket machines, dexterity and other impairments may rule out this option, so this would mean we could not get assistance booked.

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

Communicate with them. Issues arise when a person buys a ticket for the disabled passenger and tries to book the correct assistance for them, not knowing the issues that the disabled person has.

It is hard enough these days to get them to send the tickets from these agencies rather than a reference number to collect from a station ticket machine that many disabled people cannot use.

Not all wheelchair spaces are suitable for all wheelchairs. When PA is booked not through the disabled person, but a third party errors are more likely to occur. Hence the need to be able to let the disabled person themselves book the assistance.

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

See answers to Q7. Encourage them to forward details on how to book Passenger Assistance to the disabled passenger when they buy or issued with the tickets. Having to give different contact details for each TOC passenger assistance service is very confusing both for the agency and disabled or older passenger.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

Sometimes the confirmation of the PA booking goes to plan and quickly arrives as email. Other times it is lost to cyberspace. When phoning for assistance, it may not be done immediately depending on staffing and what complications the journey throws especially if it requires changes of trains. There needs to be a way for the person to communicate that they have received it, and checked it. No one method will suite all passengers and their impairments. Not all use the internet.

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Hopefully Yes! Currently it is luck. Some TOCs are more reliable but issues with the PA system in booking wheelchair spaces must be overcome. Often I have a PA confirmation of a space being booked, but no reservation on the actual space. Assistance staff at stations also do not check the reservation when it is there and put another wheelchair user in the space! This happens quite often. Some train staff try to stop us boarding a booked space because it has other things placed in it. Wheelchair spaces must be just that!

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes and no. As a disabled person I need to travel like other people. The consequences of things going wrong are usually much worse for us. No compensation makes up for not getting to meetings or appointments on time, or being faced with loss of dignity when having to crawl on and off trains, and station steps when lifts breakdown or being treated as goods going across barrow crossings. There seems to be some that think our journeys do not matter. Yes all passengers face difficulties when trains are late or cancelled, I accept that, but we face the other difficulties on top of that when assistance fails or there are issues with the wheelchair space. Assumptions are frequently made if a disabled loo is broken, and some train managers speak to assistance staff but not the passenger. Many of us can cope, so we should not simply be bumped off the train with no regards how we will get to our connecting train and destination. Many rail operators currently refund the cost of the journey or give train tickets when assistance fails, but this has little effect on reliability. We want a reliable service, not the cost of the ticket. Paying true compensation may improve the service more.

The consequences of not getting to work, meetings, hospital appointments, or catching a plane is huge. Getting the current compensation is interesting. It has only once materialised in 23 years for failed assistance despite numerous promises by different TOCs

over the years. The process of getting it is not forwarded! I am currently trying to get promised tickets from VECT from October.

I will be amazed if it turns up. They are OK with compensation for general train delays, but assistance delays or failures is different.

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

There needs to be one system for all TOC. It is otherwise too complicated, and the failures not recorded. There needs to be a central register of the failures and what went wrong and by whom. it is vital that this is audited, acted on and published. Often it is not the fault of the toc you booked with, making claiming even more complicated. People need compensating for wasted time as well as the journey. We are already expected to turn up 30 minutes early. Being taken beyond your destination, being forced to take a later train and missing connections all cost.

Chapter three – Strengthening staff training

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

Standard training course and manual.

Q14. How frequently should disabilities training take place and its content be refreshed?

It will depend on the individual and how often they are assisting. Some staff are excellent without frequent refresher courses but others appear to need extra guidance. Train staff also need training. Whilst many train managers are excellent, a minority obviously have not grasped the basics and do not like us onboard. An update at least once a year focusing on problems that have arisen and how they can be avoided in the future might help with an earlier refresher after major issues. Disabled people needs are individual. It is vital that training covers different types of wheelchairs, and how they react on ramps, and the need to check with the user, we are likely to know the capabilities and pitfalls of our own chairs, especially if independent. Taking all wheelchairs down backwards is not safe!

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

Yes in general, but as the framework suggests it must be fit for purpose. It needs adapting to meet the needs and challenges of people using stations and trains, and how they arrive and leave.

The numbers of disabled and older passengers is likely to increase. It must be remembered “The needs of disabled travellers must be at the heart of the training framework to ensure that the service fits the passenger, rather than making the passenger fit in with the service”

There is currently a tendency for the Passenger Assist wanting disabled passengers to fit the TOC model of service.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Yes but with a need to keep a central register of complaints and audit this, and a number of "mystery shopper passengers"; with different impairments accessing the system for journeys throughout the country.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

There is a need to keep a central register of complaints and audit this openly publishing the results.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

Develop ways that everyone requesting PA can report back outcomes good and bad . Via an App with alternatives for those who cannot or do not use the internet. One bad experience may put off a disabled person using trains again.

Chapter five – Reviewing DPPPs

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

Yes

Q21. Do you agree with our proposed approach to reviewing DPPPs?

Yes, but a need to involve disabled people with a range of impairments who use each TOC and Network Rail.

I believe that passengers deserve more than just a guaranteed driver on a train and that as a minimum there should be a fully qualified and safety critical Guard, as well as the driver.

I believe it is guards and station staff who are absolutely crucial to ensuring confident safe, secure and accessible rail experience for all, but especially the older, vulnerable or disabled passenger.

I want to see more not less staff at stations and on trains. It is the staff on the railway who assist passengers and provide invaluable information, help, advice, security, safety and re-assurance. They must be retained at stations and on trains if disabled, older and vulnerable passengers are not going to be discriminated against and are free to travel as and when they want, safe in the knowledge that help is close by and they are not alone on the train.

Dear Madam or Sir,

Thank you for your consultation paper on assisted travel. I agree that the railway is not only one of the best forms of travel (being green and social) it is in Birmingham, where I live, one of the quickest ways to travel. I used to travel to and from work into the city centre on the cross city line from gravelly hill station towards new street. My sons travel to and from school to aston station and the other to university station every week day. We often travel as a family into the city centre for shopping or other activities, on the train as it is quicker and there is no hassle or costs of parking.

The staff at the counter (gravelly hill station) are always so helpful and over the years have helped us with numerous difficulties, such as missing train passes (for my sons), which trains for connecting ones, the rules as children get beyond 16 but still in FT education and rules about tickets themselves, such as the times you can return on whichever train. My sons tell me that without the guards, they would have had difficulties. One of them several years ago was frightened coming home late from school and correctly found the guard who made sure he got off at the right stop and re-assured him. They also help them most mornings get on to very packed trains (or advise waiting for the next one) in the rush hour. When I go down onto the platform to meet or take them, the guard is always helping someone, either with verbal advice or with bags/pushchair etc.

I know there are plans to think about driver only trains, and although clearly the driver does a very important job, I never see the driver as clearly they are doing their job. On our cross city line, I could not imagine travelling without the guard. So many pupils travel by car now, but I cannot do this, but also it takes away a young person's growing up to be independent. I chose their schools, knowing that travelling by train which they would need to do, is (relatively) safe and certainly safer than bus travel. They also have at least some exercise as they walk to and from the stations at either end, rather than travel by car. We need to be encouraging more people to travel by train, as it is greener, safer and more empowering for young adults, as well as those who have a disability, whether physical or mental health.

My children do not have disabilities, but my mother when she was elderly (she has now passed away) had to stop driving and therefore could not get out as she was used to. She used to travel on the cross city line (she lives in selly oak) to come to spend the day with me. She was not disabled but quite frail. She so wanted to keep her independence as much as possible and she loved travelling over, talking to other rail users and got to know the guards, who would always keep an eye out for her, to remind her to get off the train (she was probably chatting away!). Many elderly people live alone and would not manage independent travel without the help of the ticket office staff (they are often very reluctant to use new machines for tickets) as well as the friendly guards. This must be even more difficult if train users have additional challenges, such as disabilities. I want everyone to be able to travel about for learning, for work or leisure, as it keeps people healthier physically and mentally.

Please to do not take away the guards as they are very helpful, and I certainly would not let my teenagers travel during the evening without a guard on, and I doubt my Mum would have managed without them, as well as all the ticket office staff.

May I just add that I do not know anyone that works currently on the railway though my grandad used to back in the 1930's!

Many thanks for reading my email and please keep the guards and other staff. I think if Birmingham gets the congestion charge at some point in the future, we will need even more trains, and staff and that is a very good thing for the future!

Yours sincerely

Dear Consultation Team

The problems with Passenger Assistance for those needing assistance, can be narrowed down in summary, to:

The poor culture in the industry, meaning that attitudes are still rooted in the 1950/1960 era. If you doubt it, consider the following example; a member of staff in a Greater Anglia ticket office ran a campaign against a sight impaired colleague including remarking that all the disabled should be got rid of. The GA management dismissed it as "workplace banter".

A further example is that there is new stock on order where the disabled area incorporates the bicycle spaces, this reminds one of the old habits of BR where those in a wheelchair were locked in a cage in a BG/ BCK or BSO(usually not cleaned from one heavy general repair to the next) along with bicycles/parcels and luggage with no access to facilities.

Standards of training are poor, with a reluctance to finance disability awareness training, or treating it with contempt. For example a National Express manager sneered that he could train staff in all aspects of disability awareness in four hours. I viewed that as beneath contempt, thankfully NX are no longer in the industry. You will have, of course, discerned that I have experience of the industry. I would, however, state that I have to pay full fare for any non duty travel I do, as it has become obvious that it is considered that there is no entitlement to passenger assist if a member of staff and would emphasize that my submission should be seen as contribution from a fare paying customer with a disability.

Looking further at the system:

Poor communication, with stations sometimes not receiving notification of booked assistance.

Staff with the experimental app on their mobile devices not bothering to check them.

My wife is disabled and I am sight impaired, on the cusp of severely sight impaired.

Should ticket purchase be linked to the assist system. the problem here is that it is not possible to be sure that a wheelchair space cannot be a certainty and is why it has been discontinued. The answer is for assistance to be booked centrally via a British located bureau; this would ensure that it is booked with all the operators involved in a journey, but also prevent the language barrier currently experienced with those who deal with the National Rail lines.

The first step to improving reliability is for ORR to draw up, in conjunction with DiPTAC, a national DPPP. This would stipulate a high minimum standard in all areas affected; TOCs would be free to exceed the standards, with penalties for falling short. There cannot be statements such as that help is not forthcoming on DOO Trains.

Mention of DOO trains makes it an apposite moment to point out how unsatisfactory these are when you have need of assistance, as the driver will do nothing. Classic example on Southern, when booked assistance was not forthcoming; when my wife came to alight , the driver watched my wife struggle off, asked if she was all right but told her he was not allowed to get out of his cab. DOO is a demonstration of the ugly culture in the industry where TOCs seek to save money and to hell with customer safety. I have been on DOO trains waiting to alight but the diver did not release the doors, the situation being saved by an alert member of staff who spotted the situation. I am unequivocally of the opinion that DOO must be got rid of. If we do have to continue to suffer it then drivers cannot be allowed to refuse to leave their cabs.

How can TOCs improve information provision? The booklet Making Rail Accessible must be put in the racks with the leaflets and timetables, this must be mandatory. If a disabled customer seeks to purchase a ticket, then the clerk must be required to offer the booklet. There must be posters with at least one in prominent position in large print. There is a good case for asking such as GP surgeries being asked to display a poster and have copies of the booklet. An imaginative advertisement on television channels at prime time and on social media would help.

TOCs must be made to have large print copies of timetables and the Making Rail Accessible booklet available, instead of making people wait a fortnight for same.

There should be a large scale LED or similar departures screen at all medium and large sized stations, with TOCs being required to invest in that provision, instead of constantly trying to get funding from another organisation. The same requirement should be laid upon Network Rail.

TOCs must be required to man all reasonably sized stations from first to last train to ensure Passenger Assist and information is available.

Finally, I am happy to be contacted by yourselves should you wish for further information.

Should there be a nationwide protocol? Yes, unequivocally so, run by ORR, not RDG which is in no sense more than a mouthpiece for the TOCs.

Should compensation be paid for assistance failures? This already happens to some degree depending on company and can vary from the derisory to full refund of fare paid, depending on circumstance. There need to be a proper national scheme, which should include the provision of a taxi to get someone to their final destination where failings mean that the final connection is missed, the cost to be borne by the company responsible for the failure.

Another aspect of failure which is totally unsatisfactory is the casual attitude of companies to disabled toilet availability. I have witnessed cases where control have sent a DMU out on a service with a disabled toilet locked out of use, rather than have a few minutes delay whilst the water tank was refilled. That causes humiliation and severe embarrassment to those who have a condition where they may urgently need a toilet. Where this happens the TOC concerned should not only pay compensation for failing to provide a working toilet but be required to pay a sum for the humiliation caused, together with a fine to be paid to ORR.

The premise that all front line staff, including drivers, should receive full disability awareness training is absolutely correct. However, it is also indisputable that all levels of management should also be trained.

The only way to ensure consistency is for ORR to draw up the programme, in conjunction with such as RNID, RNIB and similar. The next step is agree on an outside body to provide a scheduled period of the training which TOCs would not be allowed to curtail to save money. This would ensure consistency of training, with the provider being monitored to ensure quality control.

Training should be part of *ab initio* training with refresher training every two years.

Where there is a complaint about disability provision by a member of staff and it is substantiated the member of staff must be sent for retraining (this to be in addition to any disciplinary action if serious). Should there be a recurrence, after retraining, then dismissal should be considered.

Further to the mention above that that ORR should monitor training, it should also review the effectiveness of the training and if a company is found to be falling short then a heavy financial penalty should be levied.

Regards

Please consider the need for staff on both trains and stations, as a 70 year old widow of an ex-serviceman who served his country for 22years I use trains to visit family and friends, it makes me feel safe to know that at anytime during my journey I have someone to ask for help. Without those staff I would be isolated as I would not travel, I would not visit friends nor would I be able to see my son. Life is lonely enough when we are getting older and live alone, please don't take my connection with the outside world away from me. Or others like me. Remember those with physical disabilities who speak so highly of the help they receive when travelling by train , never have I heard a bad word said for the help from the staff at stations and on board the trains, please don't take this away. And what of the help needed for visitors from other countries they bring in much needed revenue are they not entitled to the help they may need. Please think hard I implore you.

Dear Sir or Madam,

We wish to express our concerns about driver only operated trains.

They pose health and safety issue for the public and the drivers who would have extra stress in their already responsible jobs of transporting passengers safely.

We need more not less assistance for the elderly and those with disabilities.

Please don't allow an uncaring, money driven policy to win in this decision.

We are proud of our rail heritage and wish to see a safe, inclusive system that we and visitors from abroad can use.

as a woman frequently travelling on trains alone late evening, feel much safer knowing that there is a guard on the train should I need help or reassurance.

Dear Office of Road and Rail

I am responding to your recent consultation document on assisted travel.

I am concerned that the current proposals to introduced driver only operation on trains are likely to make the situation of those who need assistance with travel worse. I feel that it is important for this category of passengers to have available the assistance of other train staff in order for them to feel safe to travel and for them to be able to do so with confidence. Train guards and station staff are crucial to ensuring confident safe, secure and accessible rail travel for all, but especially the older, vulnerable or disabled passenger.

Thank you.

I would like to register my full support of the RMT campaign to keep full staffing levels on trains and at railway stations.

This is not just a political viewpoint, it is common sense. People need help and advice, situations need continual monitoring and action taken as events happen, travellers need to feel safe. This requires fully trained staff being present at the right place at the right time.

No short cuts must be taken, even if 90% of the time nothing happens that requires these manning levels. As always, it is the small number of critical situations where the staffing level is justified and when the training of staff is shown at its beneficial best. Too often we have reversed cuts in the wake of tragic events, and then it is too late for the unfortunate victims. Politicians must take a long term view on this. Sometimes costs must not be cut just to increase profits.

Incidentally, I have just come back from Argentina, Brazil and Chile. In these countries, the number of officials in evidence is very noticeable, and really brings home how we have destaffed everything in this country. We are going too far.

Please do not act in haste. Listen to the industry insiders who know the true demands of the industry.

I have need of assistance when I board a train or bus

Sometimes my arthritis is so painful I walk with a stick

Other times I start out without , but if moving about after a long day , the pain kicks in or my knee doesn't want to do what it supposed to and I need help getting aboard a vehicle

Some days is better than others but it's only going to get worse as I get older

I guess it catches all of us eventually , rheumatics or ligament trouble after years of work now I need the help or just sit indoors I guess

Please keep staff on board so I can get about to the shop , doctors , hospital and relatives , thank you

Sir/Madam,

I have read the above document and would like to express my strong views on the matter.

Why are train companies being allowed to continue to cut front line staff at stations irrespective of the effect this is having on passengers especially disabled passengers.

Why should they have to pre book to travel from unstaffed stations?

Disabled people regularly travel from my local station and speak to ticket office staff who assist them and provide information and reassurance. It really isn't fair to leave these people behind with so called technology improvements, elderly people suffer much the same where there are no staff.

Please keep staff at stations so the railway can be safely enjoyed by all.

I hope my thoughts which are shared by everyone I have spoken to are considered.

Keep stations staffed.

Dear Sir

I most protest over the train companies proposals to only have one operator on their trains. My wife is wheelchair bound and we rely on the support and services of the train guard to help us on and off the trains. At weekends and evenings our local station is unmanned. My wife has independence and still goes to work although be it part time.

I would ask you again to rethink your plans and give us the service we pay for.

Dear ORR,

With reference to the above.

I have read the above and generally welcome your statement however, I believe that passengers deserve more than a driver as a minimum and there should at all times be a safety critical guard to deal with any unacceptable/unforeseen incidents that do occur on the Railway System.

Train companies have been for years cutting staff at every opportunity to pay up dividend to shareholders. As staff have dwindled assaults have risen at stations. Take the guard off the train and don't be surprised to see incidents of all crimes rise on board. Passengers travel with some degree of security in the knowledge that if needed there is help in the short term. Take the guard away and that security goes. Travel at night on a train will possibly be a definite "NO" and passenger numbers and revenue will fall as a consequence. How would you feel in something happened to your family member on a train and if a guard had been there then this something may never have happened. The opportunist is always there and so should a Guard.

Please take my concerns on board and "Keep the Guard" as a former Police Officer I can see things happening and I would rather not. Safety first, cost second.

Thank you for your time.

Recently I was on a very congested train it triggered off my [#anxiety](#), no one was around for help. I was once a keen train traveller, I even did a major project design for my degree show back in the day. Now however, now that I have diagnosed 'post traumatic stress disorder', things are very different. Crowded trains in hot conditions especially is dangerous, what if there was an accident? Only then will these questions be answered. Guards for passenger safety is absolutely imperative!
[#KeepTheGuardOnTheTrain](#)

making contact with your department as believe that staffing levels should be maintained of the trains & stations as use the train service each day & see increasing incidents on trains that are not properly staffed up correctly ,

protection of the public should be the most important issue for the government .

I have requested and used Passenger assist for my son with autism 3 times over the last 2 months. I travelled with him to see how the Passenger Assist worked as eventually I hope he can travel on his own with Passenger Assist. Unfortunately I am unimpressed with this service as each time it has failed and on one occasion left my son in a highly stressed and vulnerable situation.

1. November 13th 2017

Journey from Derby to Westbury, changing at Gloucester. At Derby -taken to the platform and left . If I had not been with him he would have missed his train. At Gloucester, nobody to meet the train and no record of Passenger Assist being requested.

2. January 14th 2018

Journey from Derby to Westbury, changing at Bristol Temple Meads. Arrived at Bristol to find bus service between Bristol and Bath. Member of staff took my son from Bath bus station to Bath railway station and then abandoned him on the platform. His train was subsequently cancelled. he never made the journey to Westbury as staff from Farleigh FE College, Frome, where he is a student, had to rescue him from Bath station as he was so stressed. I have logged a formal complaint about this.

3. January 28th 2018

Journey from Derby to Westbury, changing at Birmingham New Street and Bristol Temple Meads.

No one to meet the train at Birmingham. Had to seek assistance from another member of staff.I intend to log another complaint about this.

You need to improve your communication systems between stations and give your staff more training.It is NOT ok to leave vulnerable people unattended on the platform!

Dear ORR

I recently read your consultation report regarding assisted travel. I use the facility myself as I have a chronic back condition. Without guards on our trains this facility could not work. As a female travelling alone on a regular basis the lack of a guard would also stop me travelling at certain times when carriages are least busy.

I am vet much against the current proposals.

we want staff on stations and trains!