

ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	West Coast
Review start date	8/10/2019
Review end date	28/10/2019

ATP: Passenger Leaflet

Question	Comments
<p>Tone: Does the leaflet have an appropriate tone? Is it friendly and welcoming in tone or is there too much reliance on legal or technical language and jargon?</p>	<p>Overall, DPTAC feel the tone of the leaflet is fine with a 'matter of fact' but generally positive/reassuring tone. The leaflet benefits from the use of fairly straightforward language.</p> <p>DPTAC suggest changing the introductory section on page 3 to make it more upbeat and encouraging. The introduction is informative and factual, but needs to offer much stronger encouragement to disabled people to use West Coast's services. In particular, the introduction needs to make it clear that West Coast: is fully committed to being an accessible train operator; positively welcomes disabled customers; and strongly encourages disabled people to use its services.</p> <p>DPTAC doesn't feel that the leaflet is overly reliant on technical language / jargon.</p>
<p>Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?</p>	<p>DPTAC feels that the leaflet provides a very good level of reassurance that support and assistance will be available, but offers scope for improvement in terms of the positive encouragement offered to disabled passengers. This is particularly so as far as the introductory section of the leaflet is concerned, but could be re-enforced by positive messaging elsewhere in</p>

	<p>the leaflet. The use of positive visual imagery would also help re-inforce this message (and make the document a little less 'text heavy').</p> <p>DPTAC feel there were a number of questions raised on reading the leaflet which would benefit from clarification. For example, it talks about telling the manager on board the train if a disabled passenger needs assistance to alight, or needs assistance with on board catering facilities, but it doesn't advise a disabled passenger about the options for how to contact the train manager to make such requests whilst making a journey. Something that, in a practical sense, can be quite difficult, particularly if the train is crowded.</p>
<p>Ease of use: Does the content of the leaflet provide clarity both in terms of the language used and explanatory text? Does the leaflet have a logical and easy to follow structure?</p>	<p>The leaflet is quite long, but the information is all important and relevant. Might it be possible to create a shortened version, or create 'stand-alone' information leaflets - for example about the passenger assistance offer?</p> <p>The document is generally well-written, but, in places, the English might be overly-complex for some disabled passengers. In this context, it may be useful to ask the Plain English Campaign to review the leaflet. There are a number of sections where the grammar needs to be reviewed: for example on page 4, where the beginning of some of the bullet points doesn't follow from the stem of the introductory sentence. There are some sections where it would be beneficial to further proof read the text.</p> <p>DPTAC feel that the section on page 5, about 'before you travel' is repetitive in some ways of the information on page 4, which also includes an element of journey planning information.</p> <p>On the whole though DPTAC feels that the leaflet has a logical structure, and was fairly straightforward to use.</p>
<p>Good practice: Please highlight areas which are</p>	<p>DPTAC feel the JAM card is a good initiative in terms of improving the journey experience of disabled passengers.</p>

<p>particularly strong and/or innovative.</p>	
<p>Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.</p>	<p>Although the JAM card is a good idea, there doesn't seem to be enough detail provided to help a person with a non-visible disability understand how to identify themselves to staff. This would include, for example, people with a non-visible physical disability, autism (without a communication problem), mental health difficulties, and so on. It may be useful for West Coast to further consider this point. Use of the sunflower lanyard or an assistance card schemes might be options worth considering.</p> <p>The 'Tickets and Fares' section on page 6 also needs to refer to 'third-party' retailers such as the Trainline, from whom many disabled passengers may choose to purchase their rail tickets. The extent to which such retailers can also arrange assistance bookings, either directly or through re-direction, would also be useful.</p> <p>In the same section, it may also be worth considering whether the 'Two Together' Railcard may be a better purchase for some disabled passengers.</p>
<p>Overall comments on the leaflet.</p>	<p>Overall, DPTAC feels the leaflet is well-written, flows logically and provides a comprehensive range of information. The tone is generally positive and reassuring, but would benefit from an opening section that clearly stated the operator's full commitment to operating accessible rail services, and more strongly encouraged disabled people to use its services. The leaflet is also quite lengthy, and would benefit from shortening where possible and/or being complemented by a much shorter, cut-down version(s).</p>

ATP: Policy Document

Question	Comments
<p>Tone: Does the policy document have an appropriate tone, bearing in mind that it is a more formal and comprehensive description of the train operator's policy with regard to accessibility.</p> <p>[NB. The document should still avoid excessive use of legal or technical language, and jargon.]</p>	<p>The Policy document is positive in tone, and generally does not use legal or technical jargon (with a few exceptions – use of 'ORR' for instance on page 6 for example). It is written in clear language and benefits from addressing disabled people directly in places.</p>
<p>Motivational impact: Does the content of the policy document provide positive encouragement for disabled people to travel by rail?</p> <p>[NB. The policy document is inherently less focussed on motivational content, but should nevertheless be written in a way that encourages use of the train operator's services.]</p>	<p>In some ways, the Policy document is more motivational than the passenger leaflet. The introductory section on page 3 for instance has an excellent opening paragraph, which in shorter and modified form would be a positive addition to the Passenger leaflet.</p> <p>The other points that we made in relation to the Passenger leaflet apply to the Policy document as well.</p>

<p>Ease of use: Does the content provide clarity both in terms of language used and explanatory text? Does the document have a logical and easy to follow structure? Is the information provided sufficiently comprehensive and, where necessary, sufficiently detailed?</p>	<p>DPTAC feel that the Policy document is fairly easy to read. However, it would be useful to consider asking the Plain English Campaign to review the draft to ensure that it is accessible to people with a low reading age / cognitive ability.</p> <p>The explanation in the introductory section on page 3 of the four elements that made up West Coast's Accessible Travel Policy was very useful.</p> <p>On page 4, last paragraph, it talks about 'information fields.' It would be useful to clarify what this means.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>Overall, the comprehensiveness of West Coast's approach was commendable, and there seemed to have been quite a methodical approach to detail.</p> <p>An area of relative weakness was innovation, where only the JAM card stood out as being truly innovative. The operator may want to consider how it might broaden its approach to the development and adoption of innovatory approaches to improving accessibility.</p> <p>DPTAC notes that Pendolino trains will have braille signage. However, it would be useful to clarify where this will be located and how this will be promoted to visually impaired passengers / networks.</p>

Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.

Please see DPTAC comments on the Passenger leaflet, most of which also apply to the Policy document.

DPTAC feel that it would be useful to for West Coast to consider how a non-visible disability is defined, and how people with non-visible disabilities can be 'identified/recognised', and support provided to facilitate their use of West Coast's services.

There is mention of sensory (which DPTAC presumes refers to deaf / hearing impaired or visually impaired people, bearing in mind it also needs to be noted that many people with autism for example have sensory processing difficulties which need to be recognised), 'physical', 'mental', 'cognitive' and other impairments, but it wasn't clear if some conditions were properly recognised or understood – in particular, those disabled passengers with autism (right through the spectrum), people with non-visible physical disabilities, people with medical conditions and so on. This applies throughout the Policy document, and in particular to the training section.

It may be useful to consider whether the upgrade offer for a person with an assistance dog who is unable to find a seat in standard class would be automatically upgraded to first class could also be applied to other disabled passengers under certain circumstances - for example when there are no priority seats available on a particular service.

DPTAC was unclear as to why compliance with the Web content Accessibility Guidelines v2.1 for the website and app needs to wait until the end of 2021 before going live? It seems a long time to wait for something so important.

DPTAC note that on page 16, West Coast say that the provision of Blue Badge car parking spaces will be monitored, but it isn't clear on how this will be undertaken, and doesn't provide details of how passengers can report abuse of Blue Badge parking. It would be useful to provide some clarification around these points.

Page 21 describes the development a journey planning and guidance tool specifically for customers with non-visible disabilities, but it isn't clear what this is for and how it would work in

	<p>terms of supporting a passenger with a non-visible disability to make a journey independently. It would be helpful to provide more detail about this, and also to get a better sense of how this tool might be used more strategically.</p> <p>Section B2 on 'Management and Arrangements' might also make clear the extent to which the whole of West Coast's senior management team are aware of, trained-in, and committed to making the train operator accessible to disabled people. Is there is Board-level 'accessibility champion? Have all the senior team undergone disability awareness training? Does the Managing Director or Chief Executive have a personal commitment to accessibility?</p>
<p>Overall comments on the document.</p>	<p>Overall, DPTAC believes the Policy document to be stronger than the Passenger leaflet, particularly in terms of motivational content. It would be sensible for West Coast to consider how the motivational elements in the Policy document might also be used in the Passenger leaflet, albeit in abridged and modified form. It would also be useful for the two documents to cross-reference each other where appropriate.</p>