

ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	London North Eastern Railway (LNER)
Review start date	20 th November 2019
Review end date	7 th December 2019

ATP: Passenger Leaflet

Question	Comments
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>The leaflet is positive, friendly and easy to read.</p> <p>DPTAC doesn't feel that the leaflet is overly reliant on technical language / jargon.</p>
Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	<p>The leaflet positively welcomes disabled customers; and strongly encourages disabled people to use its services. It provides very good motivation to travel because of the presence of staff at all LNER stations and onboard all trains. We also welcome the recognition of the sunflower lanyard and the confidence that passengers who wear one will be easily identifiable to staff which enables assistance to be offered and that staff will be trained. However, we would not want passengers to either feel pressurised to wear a lanyard or any other sign in order to get the assistance they may need, nor to feel that if they don't agree to wear one that they assistance will not be available or will not be easy to get.</p>
Ease of use: Does the content of the leaflet provide clarity	<p>The leaflet has a logical structure and follows the passenger journey. The information is all</p>

<p>both in terms of the language used and explanatory text? Does the leaflet have a logical and easy to follow structure?</p>	<p>important and relevant.</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>The Sunflower lanyard is a good example of a discrete way for passengers with non-visible disabilities to signal to LNER staff that they may need assistance.</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>Under heading 2 'Assistance: what is available and how to get it' the confirmation that all LNER stations are staffed and 'all LNER trains have on board train managers' will provide a great deal of comfort and confidence to many disabled people. However, it may not be obvious to passengers which stations are 'managed by another train company' and so which stations the availability of staff is not guaranteed.</p> <p>We suggest you make it clear that staff are available to provide assistance at all times that the station/service is operating, where assistance has not been pre-booked. It needs to be explicit in the ATP that at LNER's fully-staffed stations staff can provide assistance at all times.</p> <p>The implication in the LNER text is that the operator <i>can</i> guarantee unbooked assistance at all times - but perhaps this needs to be made clearer.</p> <p>As far as the other stations go, these include many part / unstaffed stations. All LNER trains have staff, and they commit to looking out for passengers needing assistance, but as their trains are very long it might be worth querying what intending passengers need to do to ensure they can receive boarding assistance - both booked and unbooked.</p>

NRE provides info on station operators - but it's likely many passengers have no idea who operates the stations, or even the trains!

Re NRE station accessibility and staffing info, this is pretty dire in terms of accuracy and consistency. But there are specific ATP obligations relating to this, and ORR is going to audit operators next year. So things should improve (with the exception of Stations Made Easy maps, for which there seems to be no plan...)

No mention of 'help buttons' or 'calling points' onboard. These need to be next to the wheelchair space in particular, to ensure a request for a ramp can be made. I believe LNER have requested a derogation from RVAR/TSI-PRM on this for some trains but you would not know from this ATP.

At each point in the document where the phone number for passengers to call LNER is provided, it would be beneficial to also include the Text Relay number.

Redress – why is there no mention of the Rail Ombudsman Scheme in this section?

The move to reduce the 24 hour pre-notification period is welcome, but we question whether this is clearly explained or whether it could be clarified. For example, if a passenger was to travel on a train at 11pm, they would still be required to book 24 hours ahead (i.e., by 10pm the previous evening). If the system allows booking / pre-notification for later travel the same day then this information would be much more helpful to spell out.

The most appropriate term to describe those disabilities that are not visually identifiable is 'non-visible disabilities', and not 'hidden disabilities', which can be taken to imply that the disabled person in question bears some culpability in deliberately concealing their disability.

The term 'non-visible disabilities' encompasses the following conditions:

- mental health conditions, e.g., anxiety, depression, OCD, schizophrenia, personality disorders
- autism and Asperger's Syndrome
- sensory processing difficulties, e.g., sensitivity to light, noise, touch

	<ul style="list-style-type: none"> - cognitive impairments, e.g., dementia, traumatic brain injury, learning disabilities - 'non-visible' physical health conditions, e.g., chronic pain, respiratory and heart conditions, diabetes, cancer, hearing loss, low or restricted vision. <p>Many disabled people experience a combination of 'visible' and 'non-visible' difficulties, e.g., a disabled person in a wheelchair may also have a mental health difficulty</p>
<p>Overall comments on the leaflet.</p>	<p>An enthusiastic passenger leaflet expressing a strong and clear desire to get things right for older and disabled passengers. Requiring a little more clarity in some areas (see our detailed comments) and some more thought about innovative approaches to avoid over reliance on the sunflower lanyard for less visible disabilities. Evidence of a greater understanding of the broad range of non-visible disabilities in the service approach would be welcome.</p> <p>It is quite a lengthy document. It may not be possible to reduce the length without losing essential information but important to bear this in mind.</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 and avoids as much as possible legal or technical jargon.</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>Under 'changes in arrangements' there is a particularly unhelpful statement that 'at unstaffed stations operated by other train companies, processes will be in place to help adapt your journey. Please see the relevant operator's Accessible Travel Policy for further detail on how this will be done'</p> <p>How does a passenger easily find out (and why should they have to find out) who operates the stations they may well be travelling to?</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>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<p>The approach of LNER is comprehensive, detailed and methodical. DPTAC commends this. There could be more innovation in the approach to improving accessibility.</p> <p>Although of course it is commendable to support the sunflower lanyard scheme it is important that this is not seen as a 'one size fits all' solution. Not everyone will wish to use a lanyard and there are other important innovations around accessibility eg use of phone apps to request assistance. Assurances about Braille signage would also be welcome.</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>Please see DPTAC comments on the Passenger leaflet, most of which also apply to the Policy document.</p> <p>Under the heading 'seats on trains' in Section A1 it would be useful to be clear that 'priority seats' are not just for passengers 'with reduced mobility, who are pregnant or less able to stand'. This limits their availability as priority seats and may well cause anxiety for others who don't fit these categories. What about other disabled people who may need/prefer to sit in these seats?</p> <p>Need for clear accessible call buttons in the wheelchair space. Ideally these need to be next to the wheelchair space to ensure a request for a ramp can be made. This is vitally important and</p>

	<p>must be made clear in this document.</p> <p>DPTAC feel that it would be useful to for LNER to consider how a non-visible disability is defined, and how people with non-visible disabilities can be ‘identified / recognised’ other than by using the sunflower lanyard, and how support is provided to facilitate their use of LNER’s services. There seems to be little recognition that many people with autism for example have sensory processing difficulties which need to be recognised, and 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.</p> <p>It may be useful to explain whether a person with an assistance dog who is unable to find a seat in standard class would be automatically upgraded to first class and whether this could also be applied to other disabled passengers under certain circumstances - for example when there are no priority seats available on a particular service.</p> <p>DPTAC welcomes the development of a website that meets Web Content Accessibility Guidance (WCAG) and that continuing enhancements are continuing.</p> <p>DPTAC note that under ‘Blue Badge Parking Spaces’, LNER 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.</p> <p>Section B2 on ‘Management and Arrangements’ might also make clear the extent to which the whole of LNER’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 management team undergone disability awareness training? Does the Managing Director or Chief Executive have a personal commitment to accessibility?</p>
Overall comments on the	The policy document is quite lengthy, and would benefit from shortening where possible and/or

document.	being complemented by a much shorter, cut-down version(s).
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