

ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	GTR
Review start date	
Review end date	24.1.20

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?	Yes, it is friendly and welcoming. It is evident that the operator understands the social model of disability – the primary focus is on the delivery of an accessible service, not on people’s impairments.
Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	Yes. The leaflet is factual but tries to give reassurance regarding the steps the operator is taking to ensure disabled people can travel.
Ease of use: Does the content of the leaflet provide clarity both in	Yes, the leaflet is clear and logical. In terms of language, we suggest using the term ‘vision impaired’ rather than ‘visually impaired’ as this increasingly is being adopted as most appropriate – the latter can

<p>terms of the language used and explanatory text? Does the leaflet have a logical and easy to follow structure?</p>	<p>be taken to imply facial disfigurement. We also suggest the use of ‘non-visible disabilities’ rather than ‘hidden disabilities.</p> <p>On page 6/7 the phrases ‘Dedicated Support Team’, ‘Assisted Travel Support Team’, and ‘Off-site Support Team’ are used in the same section. Are these in fact the same thing? If so perhaps the language could be clarified? If not, then perhaps it could be explained what the different roles are?</p>
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<ul style="list-style-type: none"> - Focus on passenger accessibility, not just on disabled people, making journeys accessible to all; - Access Advisory Panel, enabling direct input regarding the experiences of disabled people.
<p>Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.</p>	<p>Whilst we very much welcome the intention, we feel that the phrase ‘<i>Booking assistance is very much a choice</i>’ is misleading. The latest GTR route map (https://www.nationalrail.co.uk/static/documents/content/Thameslink_route_map.pdf) indicates, via the key, that the overwhelming majority of stations are in the ‘<i>On-train or station staff available at certain times only</i>’ category – with only 10 stations annotated as ‘<i>Assisted Travel Support Trial Station</i>’, and less than 15% of stations annotated as having staff available at all times. The implication is that at certain times GTR is not able to provide assistance if un-booked, and as such booking is in effect mandatory, not a choice (we assume the operator will always provide staff when booked, but perhaps this could also be made explicit).</p> <p>The ATP Passenger Document adds later ‘<i>Should you choose not to book your assistance from an unstaffed station, by arriving and letting us know that you require assistance 20 minutes before your train is scheduled to depart, there will be enough time to provide your assistance and ensure it is not rushed</i>’. It is not explained how staff assistance will be provided in these circumstances, and the commitment made to assist includes the phrase ‘<i>if necessary, by providing alternative transport</i>’. This does not give the reader sufficient confidence that where staff are needed to provide an auxiliary aid (e.g. ramp), or assistance to board a train, this will be provided. Whilst taxis are an acceptable temporary solution to avoiding physical barriers to access at stations, they are not in DPTAC’s view an acceptable alternative</p>

	<p>to staff assistance, or the operator’s obligation to provide an auxiliary aid.</p> <p>We would emphasise that the Thameslink programme has cost £6bn – including a new fleet of ‘accessible’ trains. Disabled people are entitled to take full advantage of the opportunities to access employment and leisure that this provides – which in addition provide a return to Government via taxation receipts, reduced social welfare spending and improved health outcomes. GTR needs to be clearer in explaining how access to trains will be provided at stations indicated on its map/ stations appendix as having neither on-train or station staff to provide assistance, on both a booked an un-booked basis.</p> <p>The document (and the ‘Policy’ document) indicates that assistance dogs are welcome but there is nothing regarding what provision can or would be made for them. Would there be the option of finding two seats so that the dog is not obstructing the corridor and is next to the VI or hearing-impaired passenger? Disabled passengers need to know what to expect if travelling on GTR’s services with an assistance dog. Only saying they are welcome does not give passengers the confidence to know what that means in terms of space. This is particularly important in that you cannot book seats.</p> <p>The section regarding ticketing refers to the discounts available and talks about VI passengers needing supportive documentation from various organisations but doesn’t say “or Disabled Persons Railcard”. This could give the impression that VI passengers need both – we assume this is not the case?</p>
<p>Overall comments on the leaflet.</p>	<p>The leaflet reads as well-meaning and positive, and we do not doubt the commitment of the operator to improving accessibility. However, a major question remains regarding the ability of GTR to provide an accessible train service where unstaffed trains run to unstaffed stations. As such, the leaflet does not give sufficient confidence that the operator will fulfil its obligations towards disabled passengers.</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 regards to accessibility. [NB. The document should still avoid excessive use of legal or technical language, and jargon.]</p>	<p>Yes, it has an appropriate tone. It is evident that the operator understands the social model of disability – the primary focus is on the delivery of an accessible service, not on people's impairments.</p>
<p>Motivational impact: Does the content of the policy document provide positive encouragement for disabled people to travel by rail? [NB. The policy document is inherently less focussed on motivational content, but should nevertheless be written in a way that encourages of the train operator's services.]</p>	<p>Yes, the Policy Document encourages passengers to be confident their access needs will be met.</p> <p>There is no mention of passengers with non-visible disabilities – this is an area where perhaps the operator could revisit the text.</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</p>	<p>The language is at time necessarily complex, but the operator has endeavoured to make this as easy to understand as possible. The structure is logical and easy to follow. The information on the provision of assistance lacks some detail – as set out below in 'other specific points'.</p> <p>There appear to be a significant number of typos.</p>

<p>comprehensive and, where necessary, sufficiently detailed?</p>	
<p>Good practice: Please highlight areas which are particularly strong and/or innovative.</p>	<ul style="list-style-type: none"> - The document's emphasis is on passenger accessibility, not impairments, and as such has an inclusive appeal; - The reference to the height of signage as this is also of help to those with a vision impairment (although this was not mentioned); - Dedicated accessibility management team - Access Advisory Panel; - Try a Train days; - Use of mystery shopping; - Commitment to providing redress.
<p>Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions</p>	<p>Whilst we very much welcome the intention, we feel that the phrase '<i>Booking assistance is very much a choice</i>' is misleading. The latest GTR route map (https://www.nationalrail.co.uk/static/documents/content/Thameslink_route_map.pdf) indicates, via the key, that the overwhelming majority of stations are in the '<i>On-train or station staff available at certain times only</i>' category – with only 10 stations annotated as '<i>Assisted Travel Support Trial Station</i>', and less than 15% of stations annotated as having staff available at all times. The implication is that at certain times GTR is not able to provide assistance if un-booked, and as such booking is in effect mandatory, not a choice (we assume the operator will always provide staff when booked, but perhaps this could also be made explicit).</p> <p>The ATP Passenger Document adds later '<i>Should you choose not to book your assistance from an</i></p>

	<p><i>unstaffed station, by arriving and letting us know that you require assistance 20 minutes before your train is scheduled to depart, there will be enough time to provide your assistance and ensure it is not rushed</i>. It is not explained how staff assistance will be provided in these circumstances, and the commitment made to assist includes the phrase <i>‘if necessary, by providing alternative transport’</i>. This does not give the reader sufficient confidence that where staff are needed to provide an auxiliary aid (e.g. ramp), or assistance to board a train, this will be provided. Whilst taxis are an acceptable temporary solution to avoiding physical barriers to access at stations, they are not in DPTAC’s view an acceptable alternative to staff assistance, or the operator’s obligation to provide an auxiliary aid.</p> <p>We would emphasise that the Thameslink programme has cost £6bn – including a new fleet of ‘accessible’ trains. Disabled people are entitled to take full advantage of the opportunities to access employment and leisure that this provides – which in addition provide a return to Government via taxation receipts, reduced social welfare spending and improved health outcomes. GTR needs to be clearer in explaining how access to trains will be provided at stations indicated on its map/ stations appendix as having neither on-train or station staff to provide assistance, on both a booked and un-booked basis.</p> <p>[Station Appendix] Station step-free access classifications – a quick glance suggests several stations classified as ‘A’ do not meet the ORR criteria for this category. For example East Croydon, City Thameslink, Hove, Oxted, Bedford etc. We would encourage the operator to re-visit this issue.</p>
<p>Overall comments on the document.</p>	<p>The leaflet provides much useful information, and we do not doubt the commitment of the operator to improving accessibility. However, a major question remains regarding the ability of GTR to provide an accessible train service where unstaffed trains run to unstaffed stations. The leaflet does not give sufficient confidence that the operator will fulfil its obligations towards disabled passengers. Further details are required as to how the operator’s staffing model is consistent with the provision of an accessible railway.</p>

[ORR suggested areas for further review](#)

Document	Guidance Element	ORR Comment	Stakeholder Comment