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24 November 2023

Charlie Woodhead
Accessibility and Integrated Travel Manager
London North Eastern Railway
By Email

Dear Charlie,

Approval of London North Eastern Railway's proposal to introduce an alternative process for communicating between stations on assistance provision

Thank you for your letter dated 8 August 2023, outlining a proposal for London North Eastern Railway (LNER) to replace the handover protocol with an alternative process. You made this application in view of LNER's resource concerns with handover protocol compliance, and in the context of LNER having made a significant investment in deployment and training for the Passenger Assist (PA) staff app. We have considered your application in the context of the requirements set out in our September 2020 *Accessible Travel Policy Guidance for Train and Station Operators* (ATP Guidance), and outline our decision-making process below.

I am pleased to confirm that ORR accept LNER's proposal to trial use of the PA staff app for booked assists on journeys between stations where LNER is responsible for provision of assistance. For all other assists LNER will continue to use the telephone handover protocol to confirm the details of the journey, alongside the staff app.

ORR requirements

Section A.1.2e of the ATP Guidance specifies requirements for operators on the provision of assistance for passengers, intended to improve clarity about responsibilities and consistency of process across the industry, and (in doing so) improve reliability. Operators are required to follow a 'handover protocol' which sets out consistent industry processes for communication between stations, helping to ensure that staff at the destination station will be there to assist the passenger off the train. The three key elements of the handover protocol are:

1) A dedicated assistance telephone number for each station.
2) A responsible person for assistance-related communications for every station.
3) A handover protocol for the communication of assistance information between stations.

The Guidance, under section A1.2e, also allows an operator and ORR to agree an alternative process provided it has the same functionality and effectiveness as the handover protocol.

You made a request for ORR to consider and approve a different, LNER-specific process.

LNER proposal

Your proposal, and the reasoning behind it, is set out in your letter of 8 August 2023.

You state that the volume of assists being delivered by LNER across its stations, and therefore the required number of handover phone calls, is leading to heightened risk of either assists not being delivered or the handover protocol not being followed, with staff often facing 'a choice between completing the handover protocol and delivering assistance'.

You have therefore proposed an alternative: use of the PA staff app. This tool provides operational staff with live information on their mobile phones, using booking information from the industry PA system. With input from operators and passengers, Rail Delivery Group have coordinated its development, and it has been delivered by TransReport. During 2023 LNER invested in roll-out and training for passenger-facing staff at all 11 of the stations that LNER manages, and also at London King's Cross and Edinburgh Waverley where LNER is responsible for delivery of assistance. You provided data showing that the roll-out has progressed well, with almost all bookings actioned through the PA staff app – 96.8% of bookings during the weeks of 5 June to 24 July 2023. Your audit of this data showed that the reason for this being below 100% is primarily due to staff sometimes not marking a booking as complete after helping someone off a train, rather than the assistance not being delivered, and that you have impressed upon staff the importance of doing so.

You propose that use of the PA staff app can replace the need for a phone call (as required by the handover protocol) between two stations that are making full use of the app. You consider this appropriate for the following reasons:

- All passenger-facing staff are equipped and trained, and usage levels are high.
- All LNER stations are staffed first-to-last service, so there will always be a member of staff picking up messages through the PA staff app.
- The PA system is frequently checked, and any 'turn up and go' or same-day bookings will also trigger an email alert to a monitored inbox at each station – this inbox is monitored from the same phone or the same location as the landline phone where handover protocol calls are required, so you consider it no less likely that the email will be received (although the recipient does not have to be available the moment the calls comes in).

You propose that the app should be used exclusively for handover for booked assistance between stations that use the app. The app process includes confirmation of passenger name, assistance needed, time of arrival, train headcode and location on train. This is consistent with the standard required by the handover protocol.

For ‘turn up and go’ (or unbooked) assistance, the PA staff app will also be used to enter the information, but an additional phone call will be made to confirm this information has been received. In recent engagement you confirmed that this reflected the greater risk surrounding ‘turn up and go’ bookings, noting that because unbooked assists are fewer in number for LNER the additional resource burden and therefore risk to successful delivery of assistance is relatively low. For any journey legs where staff at either station do not use the app the existing handover protocol process will be retained.

You proposed three options for roll-out of this alternative process:

- Option A: New process used for booked assistance between stations where LNER deliver assistance, and existing process for all other journeys.
- Option B: New process used for booked journeys between LNER-managed stations and existing process for all other journeys initially, and following a review period, other operators’ ‘app-compliant’ stations will also be included, subject to agreement from the operator and local teams, with the current process used for unbooked journeys.
- Option C: New process used for booked journeys between LNER-managed stations and other operators’ app compliant stations, subject to agreement from the operator and local teams, with the current process used for unbooked journeys.

You have outlined the process that you have gone through to prepare for the potential implementation of these changes. This included thorough training on the PA staff app for colleagues, extensive internal monitoring of app usage and active engagement with staff where the app has not been used appropriately.

You have also consulted with your customer panel, which includes passengers with lived experience of disability. You note that they were positive about this initiative, although they emphasised the importance of passenger confidence and frontline staff providing appropriate reassurance to passengers, who may be used to the existing process.

<u>ORR decision</u>

We approve use of LNER’s proposed alternative process for booked assistance on journeys between stations where LNER is responsible for provision of assistance (Option A) for a trial period. For all other assists LNER should continue to use a telephone call, as required by the handover protocol.

Stations where LNER are responsible for provision of assistance are those that are managed by LNER, as well as London King’s Cross and Edinburgh Waverley.

We are not approving Options B and C because operators are at varying stages of maturity in implementation of the PA staff app, and the resultant inconsistency in usage could present a risk to the reliable delivery of assistance. Additionally, the networks of LNER and other operators vary, for example in terms of staffing models and service patterns, therefore the alternative process proposed may not be suitable for all. More generally, we do not wish to create a precedent whereby other operators have to follow your approach or adopt it despite it not being most suitable for their individual circumstances.

We have reached this decision after extensive engagement with LNER, including station visits to London King's Cross, Grantham and Newark, where we gained a valuable insight into the delivery of assistance. We used these visits to challenge you and your colleagues on how the PA staff app works in practice, including contingency in the event of train service disruption and app server outages. We were satisfied with the answers that we received. We also requested further information on the process flow-chart, with detail on what will happen at the destination station, which you have provided.

We have engaged with relevant industry colleagues, including Network Rail (for whom you are responsible for delivering assistance at London King's Cross and Edinburgh Waverley), and Rail Delivery Group, who oversee development of the PA staff app.

We have considered the findings from our audit of passenger assistance at five train operators, including LNER. This audit has looked into operators' use of the PA system (including the staff app), implementation of the handover protocol, and the management systems in place to monitor performance and take remedial action. Our audit identified challenges for LNER in complying with the handover protocol at busy times in some locations, as mentioned as part of your proposal, and we welcome your proactive approach to proposing a solution. No other significant concerns were identified by the audit.

We have taken into account LNER's performance in our annual survey of booked assistance where LNER has consistently been among the best-performing operators.

Lastly, we have engaged with ORR's Accessible Travel Stakeholder Forum, a panel of individuals from passenger representative bodies that meets twice a year to discuss ORR's accessibility-related work. They saw value in LNER's implementation of a PA staff app-based approach and the potential for this to act as a pilot for the rest of industry. However, concerns were raised about the impact on passenger confidence of the proposed process's reliance on the app. They felt that this could be mitigated by establishing a suitable evaluation framework, which could also help inform future thinking about how the PA staff app may complement the existing handover protocol process across industry. Subject to this being addressed, the panel were broadly supportive of the proposal.

This provisional approval is for an initial trial period, until 30 April 2024. We require you to provide us with an update by 31 March 2024 to confirm how implementation has progressed and to understand if the change has been effective. This update should include data on the number and percentage of assists that have not been completed due to communication failure, over a time series than enables comparison between before and after implementation of the app. Please also provide any additional relevant evidence of performance including, for example, a summary of qualitative feedback from passenger complaints and information on any disruption to functionality of the app. You also offered us the opportunity to visit your stations again post-implementation, and this is something we would welcome. We will consider the evidence provided in your March submission, and then reach a decision on whether to extend the initial approval.

We note that the PA staff app is subject to further planned improvements, including the development of an 'electronic handover' functionality. RDG is continuing to work with

operators and TransReport to plan and deliver these further improvements, and to agree common operational processes for use of the app. LNER should continue to play a full role in this work: sharing LNER's experience from use of the app during the trial period, and incorporating changes to app functionality and industry processes within LNER's own working practices as appropriate.

Next steps

As outlined above, please provide us with an update on implementation by 31 March 2024. In the meantime, we will publish this decision letter, along with your proposal letter, on our website.

Yours sincerely,

Jacqui Russell

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