ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	Northern
Review start date	
Review end date	9/12/19

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?	Overall, DPTAC believe the current ATP Passenger Leaflet offers scope for improvement in terms of tone. In places, the information provided is rather vague. Much of the detail provided in this appears to be a direct duplication of information provided in the ATP policy document and as such, this makes 'heavy' reading (the policy document is 24 pages long and the ATP passenger document is 11 pages long).
	A suggestion is therefore made that Northern summarise their 'offer' to disabled passengers via the ATP Passenger Leaflet in a way that is succinct and to the point, and use the policy document to provide the in-depth detail disabled passengers may require in terms of forward planning and undertaking a journey.
	One point Northern may wish to consider to address this is to ask the Plain English Campaign to review the ATP document to make it more user-friendly. Alternatively, Northern may wish to consider consulting with the Northern Accessibility User Group to help establish a means to make this leaflet more user-friendly.
	In places, the language of the ATP document refers to disabled passengers in a segregational context. For example, in the introductory paragraph, there is a statement which states "This leaflet, 'Making Rail Accessible' provides a practical guide to travelling with Northern, explaining what we do to assist older and disabled customers and the standards of service <i>they</i> can reasonably expect". This needs to be amended to make it more inclusive by referring to disabled passengers in a more personal manner, i.e.,

	use the phrase you as opposed to 'they'.
Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	In general, the ATP passenger document offers a positive, customer-facing tone however, DPTAC believe this document needs to be shorter and more succinct, taking into account feedback provided elsewhere in this review form.
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?	There is scope for improvement here. Please refer to feedback provided in the "other specific points" section below. It is also questionable whether certain sections need to be included in this customer- facing document: for example, the section on disability awareness training. A point could be made that this would be better placed in the ATP Policy Document. The current ATP Passenger Leaflet document would benefit from further proof reading. For example, in the Senior Railcard section, the following statement is used: "Further details of eligibility criteria and how to apply for a <i>get</i> a railcard can be found at…" One suggestion for consideration may be for Northern to consider testing this ease of use aspect on a group of disabled users of Northern services to help inform potential practical improvements, then discuss outcomes of any testing exercise with their Northern Accessibility User Group to further reinforce proposed improvements.
Good practice: Please highlight areas which are particularly strong and/or innovative.	

Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.	 Additional comments ORR may wish to consider relate to the following: It would be useful to consider adding a short section about what support a disabled passenger can expect in terms of onward travel at the destination station. Ensure the font size follows guidance (RNIB) designed to meet the requirements of partially sighted people (it is currently published in font size 11). Whilst it is recognised that the passenger ATP document [and the policy document] can be offered in large print on request, it is good practice to provide public facing printed information in point 14 as a matter of standard. It would be useful to use terminology along the lines of "supporting" or "assisting" rather than "helping". "Assisting" disabled customers would be consistent with the language of Passenger Assist terminology. Northern need to avoid use of terminology which includes the words "truly" and "fully" accessible. In terms of replacement rail services it would be helpful to suggest ORR consider putting the onus on Northern to procure compliant alternative transport (buses, coaches and wheelchair accessible taxis), when required. It is suggested that Northern add a statement that alternative transport arrangements will be offered to disabled passengers at no extra cost, should this be required / necessary. In the opening paragraph, it might be useful to offer an example of the type of assistance available; at the end of the paragraph, it might also be worth adding something about what options exist to make contact with the conductor; and it might be wasfut to assist a disabled passenger to purchase a ticket from a ticket machine at stations. It would be helpful to elaborate on what support is available via staff to assist a disabled passenger at non-PRM-TSI compliant, and elaborating in the ATP Policy Document the measures that will be put in place to mitigate this non-compliance.

Overall comments on the leaflet.	Please see above.

ATP: Policy Document

Question	Comments
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. [NB. The document should still avoid excessive use of legal or technical language, and jargon.]	Overall, DPTAC believe the current ATP Policy Document offers scope for improvement in terms of tone. In places, the information provided is rather vague. As there is a good deal of overlap between the Passenger and Policy documents, it would be useful for the two documents to cross-reference each other where it would be helpful to do this. For instance, where the Policy document provides additional detail, it would be useful for the Passenger leaflet to signpost this.

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 useof the train operator's services.]	In general, the ATP Policy Document offers a positive, customer-facing tone. However, DPTAC believe this document needs to be further reviewed, taking into account overall feedback provided in this review form to add value to the current approach.	
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?	Please see comments in the ATP Passenger Leaflet feedback above. It may be useful to suggest to Northern that they commission the Plain English Campaign to review the ATP Policy Document to make it more user-riendly. Northern may also wish to consider a consultation exercise with disabled users of Northern services to help inform a means to make this policy document more user-friendly.	
Good practice: Please highlight areas which are particularly strong and/or innovative.		

Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.	 Comments ORR may wish to consider relate to the following: Add 'Text Relay' prefix against all telephone numbers provided to assist hearing impaired people to access services. It would be useful to provide further detail about how a disabled passenger, especially a visually impaired person, would recognise and make use of a help point. It would be useful to consider highlighting in the ATP Policy document any Northern services that use rolling stock that is non-PRM-TSI compliant, and describing the measures that will be put in place to mitigate this non-compliance.
Overall comments on the document.	It is suggested that ORR seek feedback on whether the Northern Accessibility User Group will be further involved in reviewing this ATP Policy Document (and the ATP Passenger Leaflet) to ensure that it remains a living document, and subject to continuous improvement over time.

ORR suggested areas for further review

Document	Guidance Element	ORR Comment	Stakeholder Comment