Audit Review

Passenger Assist Audit
for the Office of Rail and Road

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Glossary

ATP	Accessible Travel Policy; see Accessible Travel Policy, Guidance for Train and Station TOCs, September 2020 edition (includes March 2021 clarification)	
BPG	Best Practice Group	
EIA	Equality Impact Assessment	
EMR	East Midlands Railway	
GTR	Govia Thameslink Railway	
HP	Handover Protocol; see Accessible Travel Policy, page 50: Appendix C: Passenger assistance handover protocol technical guidance	
LNER	London North Eastern Railway	
ORR	Office of Rail & Road	
PA	Passenger Assist – industry system for logging assistance, including advanced bookings. It supports an application with a customer interface, a staff mobile interface which records bookings, logs assistance and allows station to communicate, and a staff desktop interface	
PA Staff App	The mobile Staff App that interfaces to Passenger Assist	
RDG	Rail Delivery Group	
Station Connect	The application that supports connectivity e-mail and voice to all British stations	
TOC	Train Operating Company	
TUAG	Turn Up and Go – in relation to customers not pre-booking assistance	
IR	Industrial Relations	

Overview

Purpose of Document

The Office of Rail and Road (ORR) commissioned Best Practice Group (BPG) to undertake an audit of passenger assistance at five Train Operating Companies (TOCs). This document briefly summarises the audit's objectives and methodology, and provides the individual audit summary report for each TOC – including areas for improvement and of good practice.

BPG would like to thank East Midlands Railway (EMR), Govia Thameslink Railway (GTR), Greater Anglia, London North Eastern Railway (LNER), and Northern Trains for their cooperation with this audit. They have all been honest, open, and helpful.

Audit Scope and Objectives

ORR commissioned BPG to look at how TOCs comply with regulatory requirements associated with three aspects of assistance:

1. Use of the industry-wide Passenger Assist system.

2. Implementation of the Handover Protocol.

3. The overall management system used by TOCs, including monitoring and assurance processes.

The requirements relating to these aspects are set out in ORR's ATP Guidance, which ORR monitors and enforces under licence.

This is not an audit of the wider accessibility requirements set out in the ATP guidance, or elsewhere.

Use of the Passenger Assist system and Handover Protocol

Part one of the audit centred on questions of process, including compliance with use of the Passenger Assist (PA) system and Handover Protocol.

The PA system is an industry-wide software system used by all TOCs for logging customer bookings and generating a TOC's daily list of assistances. Use of the PA system is a regulatory requirement. Pre-booked assistance is requested by customers at least two hours before travel. After this period customers are considered 'Turn-up-and-go' (TUAG).

The PA Staff App sits on top of the PA system and enables frontline staff to use their smartphones to register the arrival and assistance of booked passengers, and to register unbooked TUAG passengers onto the system. The PA Staff App is not a regulatory requirement and therefore the adoption and use of the Staff App is different across each TOC. Some TOCs have already rolled out the technology and training for the Staff App, while others are currently going through the roll-out and training process.

Part one of the audit also assessed TOC compliance with the Handover Protocol – a mandatory operational process, except on services where assistance at the destination station is provided by onboard staff.

One of the main risks to the reliable operation of assistance is clear and timely communication between departure and destination stations. To mitigate this risk ORR developed a Handover Protocol that TOCs must follow when assistance at the destination station is not delivered by

onboard staff. The Handover Protocol was developed with input from TOCs and disabled passengers, and is set out fully in ORR's ATP Guidance. The key requirements are for each station to have a dedicated phone number and rostered responsible person for assistance communications, and for staff at the departure station to contact the destination station to communicate the specific information necessary to ensure that the passenger receives the assistance when they arrive.

Part one of the questionnaire consisted of 15 questions on compliance with regulatory requirements associated with the provision of assistance, focusing on use of the PA system and Handover Protocol. TOCs self-assessed themselves against the questionnaire: whether they are compliant, partially compliant, or not compliant with the relevant sections of the ATP Guidance and Handover Protocol. They answered the corresponding questions and provided relevant supporting evidence. This supporting evidence was reviewed by BPG and challenged where necessary.

Overall management system, including monitoring and assurance processes.

Part two of the audit focused on TOCs' management systems, including the processes and structures that they have in place to monitor performance. All TOCs are required to commit to continuous improvement in accessibility, and to ensure that adequate resource, expertise and management oversight is in place to deliver assistance and monitor performance.

The aim was to understand the procedures, systems, training, governance, and improvement plans that TOCs have in place to manage the provision of assistance. The objective was to assess compliance with the high-level ATP requirements in this area, to help identify areas of good practice which can be shared across TOCs, and to identify risk areas which can then be improved upon.

In assessing the management systems that TOCs have in place, the audit adopted a *Soft Systems* methodology, which focused on whether the systems and processes that TOCs described were a *viable* method of ensuring effective management.

The TOCs' answers and evidence submitted for part two of the questionnaire were reviewed by BPG with respect to the viability within the operational context that the TOC works in. The varied nature of the TOCs' different networks, structures and investments means that they could have different answers to the same question, and workable solutions to support compliance with the ATP requirements could vary significantly. Viability in this section can be summarised as "Does the TOC understand its issues? Does it have processes, plans and the capacity to address them?" It was not within the scope of the audit to find improvements or to comment on each specific area but to identify if the TOC had the systems in place to effectively manage the process.

Audit process

ORR commissioned BPG to undertake the audit in April 2023. The TOCs were selected to represent a range of service types (commuter, long-distance, regional), staffing models, and levels of maturity in usage of the Staff App.

BPG started with stakeholder interviews – with ORR, each TOC and the Rail Delivery Group. Questionnaires were then developed by BPG, taking inspiration from the ORR ATP Guidance, the Handover Protocol requirements and BPG's understanding of the tactical management functions required to support the Handover Protocol and provision of assistance. These were shared with ORR

for review and then with the TOCs for their input and agreement. Their comments and queries were considered, and the questionnaires updated accordingly. The final questionnaires were sent to the TOCs in June 2023.

To ensure that TOCs had the necessary capacity to carry out the work, the return of the questionnaires from the TOCs was deferred until September 2023.

On return of the completed questionnaires and supporting evidence, an initial review was conducted by BPG. These initial findings and clarification questions were shared with each TOC separately. BPG and each TOC jointly reviewed the findings and queries which resulted in the findings being further updated. Items considered good practice were highlighted.

In seeking evidence of compliance with mandatory processes the requirement was, typically, for examples rather than detail for each station in a TOC. For example, where it relates to station level protocols on the responsibility for handovers, the audit looked for examples covering staffed, unstaffed and partially staffed stations. The audit also looked at staffed and driver-only services where they interact with PA processes and the handover protocol, where relevant.

The individual analysis by BPG for each TOC's response was shared with the TOC to check accuracy and compliance. The analysis was then updated with ORR input and again shared with the TOCs. Summary audit reports for each TOC are appended below, which highlight the key audit findings for each TOC, and identify areas for them to strengthen their compliance.

Individual TOC reviews

Summaries of the findings for each of the TOCs is available in the Appendices A-E. Each report summarises the particular characteristics of the TOC, then identifies the key areas for improvement, and good practice. Fully detailed reports will be shared with each TOC separately.

- East Midlands Railway (EMR): Appendix A
- Govia Thameslink Railway (GTR): Appendix B
- Greater Anglia: Appendix C
- London North Eastern Railway (LNER): Appendix D
- Northern Trains: Appendix E

A blank copy of the questionnaire that was shared with TOCs is at Appendix F, with a description of the criteria used for assessment of Part Two of the audit.

ORR audit of East Midlands Railway's delivery of Passenger Assistance

Introduction

This is the summary report on East Midlands Railway's (EMR) response to the Passenger Assistance audit, conducted by Best Practice Group for the ORR in September 2023. The audit focused on how five Train Operating Companies (TOCs) meet regulatory requirements associated with three aspects of assistance for disabled passengers:

1. Use of the industry-wide Passenger Assist (PA) system.
2. Implementation of the handover protocol.
3. The overall management system used by TOCs, including monitoring and assurance processes.

The full report has been shared with EMR, who have had a chance to respond. This summary includes key findings and areas for improvement, and will be published by ORR.

Service characteristics and performance

EMR operates intercity services from London to Nottingham and Sheffield, regional services across the Midlands, and local commuter services between London and Northamptonshire. It is responsible for delivering assistance to passengers at the 102 stations that it manages. This includes some large busy stations like Sheffield and Nottingham (where it is also responsible for providing assistance for the services of other TOCs), and also 76 unstaffed stations where assistance is provided by onboard staff. EMR services also call at stations managed by other TOCs and Network Rail.

In 2022-23 there were 66,669 assistance bookings – more than ever before - at stations managed by EMR (not including unbooked or 'Turn-Up-and-Go' assists). ORR's annual survey of booked assistance for 2022-23 shows that 7% of the 204 EMR passengers surveyed did not receive any of the assistance that they had booked (compared with an industry average of 8%), with a Net Satisfaction score of 92% (industry average 95%). While there is room for improvement, both of these measures show a year-on-year improvement for EMR.

Key findings and areas for improvement

In its self-assessment, EMR stated that it was partially compliant with some elements, mainly relating to the requirement to use the Handover Protocol for communication between stations. However, it should be noted that the Handover Protocol is not required where assistance at the alighting stations will be delivered by onboard staff. EMR manage 76 stations where assistance is provided by on-board colleagues.

EMR also noted that not all on-train staff were equipped with the Passenger Assist Staff App, but were in discussions with colleagues to advance this.

The audit found some areas of good practice and innovation, noting several examples of how EMR sought to improve its performance. These include a dedicated WhatsApp contact for deaf customers

with a QR code placed on help points, and stickers on the back of colleagues' phones with a summary of passenger assistance requirements to help ensure staff awareness.

The audit found the following areas for EMR to address:

- **EMR should take appropriate steps to improve the reliability of communications between stations.** To ensure communication between stations the ATP Guidance requires TOCs to ensure that the contact details for each of its stations are entered correctly within the relevant industry directories. EMR has identified that the Station Connect digital directory, which holds telephone numbers for all stations, does not function reliably due to incorrect information. EMR has already implemented six-monthly checks for contact information at its own stations. In 2024 it plans to introduce automatic call-diversion to a central call centre if phones are not answered. EMR should carry this work forward, implement and review performance.

  EMR should also continue to work with other TOCs and the Rail Delivery Group to ensure that these issues are escalated and addressed on an industry level. Where it has concerns about correct contact information being available for specific stations then it should flag the issue for the relevant industry colleagues, as appropriate.

- **EMR should develop a solution for recording and reporting numbers for unbooked assistance.** Currently EMR does not have a robust system in place for recording the quantity of unbooked assistance delivered, or reporting this to ORR as part of its monthly core data returns. This is important for helping to understand passenger demand, and managing the service that it provides for disabled passengers accordingly. EMR is facing difficulties with implementation of the Passenger Assist Staff App (which could potentially resolve this issue). EMR should therefore consider potential alternative solutions for generating usable data on the numbers of unbooked assistances that it delivers, both for its own internal monitoring, and for reporting to ORR.

- **EMR should consider rolling out the related improvements it has gained or implemented for various aspects of accessibility.** EMR has various accreditations across its stations and services;
  - Autism accreditation on the Poacher Line
  - Autism support packs for the EMR Assistance Lounge in Nottingham
  - Working toward achieving the Communication Access Accreditation at Derby Station and Customer Service Centre.

  There may be the potential for broader rollout of these programmes, resource permitting.

- **EMR should consider applying the principles of its safety management system as part of the drive for service improvement.** Using an existing process could help to embed in the culture that accessibility is an integral part of the business, rather than a special service. It could also help to ensure systematic monitoring and management of accessibility risks, with appropriate governance for decision-making, and escalation thresholds.

- **EMR should consider development and implementation of an Accessible Travel Risk Register, given the interconnectedness of EMR's network.** This would enable the service to document and track issues of different scopes and impacts that it encounters. It would allow it to follow up, in a structured manner, issues not directly the responsibility of EMR but which impact the service its customers receive. In the future this could potentially integrate into the previous item.

[name redacted]   [name redacted]

ORR audit of Govia Thameslink Railway's delivery of Passenger Assistance

Introduction

This is the summary report on Govia Thameslink Railway's (GTR's) response to the Passenger Assistance audit, conducted by Best Practice Group (BPG) for ORR in September 2023. The audit focused on how five Train Operating Companies (TOCs) meet regulatory requirements associated with three aspects of assistance for disabled passengers:

1. Use of the industry-wide Passenger Assist (PA) system.
2. Implementation of the Handover Protocol.
3. The overall management system used by TOCs, including monitoring and assurance processes.

The full report has been shared with GTR, who had a chance to respond. This summary report includes key findings and areas for improvement, and will be published by ORR.

Service characteristics and performance

GTR operates local and commuter rail to the regions north and south of London, including Southern services to the South Coast, Great Northern services into Hertfordshire and East Anglia, Thameslink services that run through London, and the Gatwick Express airport service. GTR is responsible for delivering assistance to passengers at the 235 stations that it manages. This includes some large stations like Brighton, but also unstaffed stations where assistance is provided by either onboard staff or Mobile Assistance Teams.

In 2022-23 there were 88,374 assistance bookings – more than ever before – at stations managed by GTR (not including unbooked or 'Turn-Up-and-Go' assists – which GTR consider to make up the majority of the assistance it delivers). ORR's annual survey of booked assistance for 2022-23 shows that 8% of passengers did not receive any of the assistance that they had booked (the same as the industry average of 8%), with a Net Satisfaction score of 97% (industry average 95%). While there is room for improvement on the percentage of passengers not receiving assistance, both of these measures show a year-on-year improvement for GTR.

Key findings and areas for improvement

In its self-assessment GTR stated that it is fully compliant in all operational aspects relating to its use of industry systems and processes, and presented evidence to support this. GTR also reported that staff are equipped with the PA Staff App, and trained in its use. However, it expressed concerns with some aspects of functionality with industry systems.

The audit found some areas of **good practice and innovation**, particularly in terms of GTR's management systems, including the use of monitoring and risk assessment tools. GTR makes good use of its 'zero harm' safety management system to help identify and remedy root-cause issues that contribute to any accessibility issues.

GTR also runs regular revalidation exercises, to help ensure that contact details for customer-facing station staff are accurate and functioning for all GTR-managed stations, and that where details have changed the relevant content of internal and industry-wide directories is updated.

The audit found the following areas for GTR to address:

- **GTR should assess the potential risk of communication failure due to missed telephone calls, and take proportionate steps to address any issues.** Although GTR stated that it makes full use of the Handover Protocol, it stated that it is not able to identify the number of Handover Protocol calls that are diverted to answer machines, and that there may be a potential issue at unstaffed stations without digital connection.

  The Handover Protocol states that the relevant contact number for arranging assistance to an unstaffed station may actually be at a location remote from the station in question; either a central call centre or neighbouring station, from where the appropriate assistance can be arranged. GTR should review whether there is a material risk of communication failure due to a lack of technology to manage call diversion to answer machines and, if so, take appropriate steps to remedy.

[name redacted]			[name redacted]

APPENDIX C– Greater Anglia

ORR audit of Greater Anglia's delivery of Passenger Assistance

Introduction

This is the summary report on Greater Anglia's response to the Passenger Assistance audit, conducted by Best Practice Group (BPG) for the ORR in September 2023. The audit focused on how five Train Operating Companies (TOCs) meet regulatory requirements associated with three aspects of assistance for disabled passengers:

1. Use of the industry-wide Passenger Assist system.
2. Implementation of the handover protocol.
3. The overall management system used by TOCs, including monitoring and assurance processes.

The report has been shared with Greater Anglia, who have had a chance to respond. This summary report includes key findings and areas for improvement, and will be published by ORR.

Service characteristics and performance

Greater Anglia operates regional train services across East Anglia and into London. It is responsible for delivering assistance to passengers at the 134 stations that it manages. This includes some large busy stations like Cambridge and Norwich (where it is also responsible for providing assistance for the services of other TOCs) and also a wide network of unstaffed stations, some of them in remote locations. At some of these stations, assistance is provided by onboard staff, while at others, assistance is provided by mobile assistance teams, based at 'hub' stations. Greater Anglia also calls at stations managed by other TOCs and Network Rail.

In 2022-23 there were 41,446 assistance bookings at stations managed by Greater Anglia – more than any previous year (this figure does not include unbooked or 'Turn-Up-and-Go' assists). ORR's annual survey of booked assistance for 2022-23 shows that 9% of passengers did not receive any of the assistance that they had booked (compared with an industry average of 8%), with a Net Satisfaction score of 94% (industry average 95%). Both of these measures show a year-on-year improvement for Greater Anglia, although there is still some room for improvement.

Key findings and areas for improvement

In its self-assessment, Greater Anglia stated that it is fully compliant in operational aspects of the audit, relating to its use of industry systems and processes. It reported that staff are fully equipped with the PA Staff App, and trained in its use. However, Greater Anglia expressed concerns with some areas of implementation, and poorly functioning industry systems.

The audit found some areas of good practice and innovation, particularly in terms of how Greater Anglia has rolled-out the PA Staff App, and utilised the app's reporting and monitoring functionality to help assess demand levels and performance – with steps taken as a result to improve the provision of assistance.

The audit found the following areas for Greater Anglia to address:

- **Greater Anglia should continue to work with other TOCs and the Rail Delivery Group to facilitate continuous improvement of Passenger Assist, staff and passenger apps.** Greater Anglia also noted that, while it made good use of the apps, there were some key areas where it could be improved further to provide a more reliable and responsive service. This included the functionality for staff to be able to contact customers that used the passenger app, to inform them of unplanned disruption. As a member of the Rail Delivery Group, Greater Anglia should continue to engage with the relevant TOC colleagues and support teams to ensure that the system issues are identified, appropriately prioritised, resourced and addressed.

- **Greater Anglia should work with the Rail Delivery Group to identify issues with other industry systems, and to facilitate any necessary improvements to these systems.** Greater Anglia reported some issues with the usability of the Station Connect voice recognition software, which limited its usefulness and reliability. Greater Anglia also noted some difficulties – since resolved – with making accessibility and contact information for a new station available on industry directories.

- **Greater Anglia should consider applying the principles of its safety management system as part of the drive for service improvement.** Using an existing process could help to embed in the culture that accessibility is an integral part of the business, rather than a special service. It could also help to ensure that systematic monitoring and management of accessibility risks, with appropriate governance for decision-making, and escalation thresholds.

[name redacted]   [name redacted]

ORR audit of LNER's delivery of Passenger Assistance

Introduction

This is the report on London North Eastern Railway's (LNER's) response to the Passenger Assistance audit, conducted by Best Practice Group for the ORR in September 2023. The audit focused on how five Train Operating Companies (TOCs) meet regulatory requirements associated with three aspects of assistance for disabled passengers:

1. Use of the industry-wide Passenger Assist (PA) system.
2. Implementation of the Handover Protocol.
3. The overall management system used by TOCs, including monitoring and assurance processes.

The full report has been shared with LNER, who have had the chance to respond. This summary report includes key findings and areas for improvement, and will be published by ORR.

Service characteristics and performance

LNER operates long-distance services along the East Coast Mainline between London, Leeds and Edinburgh, with extensions including Inverness and Aberdeen. LNER is responsible for delivering assistance to passengers on LNER trains, as well as those of other TOCs, at the 11 stations that it manages, including large busy stations like York and Newcastle, and smaller stations such as Grantham and Newark. LNER also provides assistance on behalf of Network Rail at London Kings Cross (for long-distance passengers) and at Edinburgh Waverley. All of LNER's stations and train services are staffed.

In 2022-23 there were 101,266 instances of assistance provided at stations managed by LNER (not including unbooked or Turn-up-and-Go assists, or assistance delivered by LNER at King's Cross and Edinburgh Waverley). ORR's annual survey of booked assistance for 2022-23 shows that 5% of passengers did not receive any of the assistance that they had booked (compared with an industry average of 8%), with a Net Satisfaction score of 96% (industry average 95%). Both of these measures show a small year-on-year improvement.

Key findings and areas for improvement

In its self-assessment LNER stated that it is compliant with the operational requirements relating to use of the PA system and implementation of the Handover Protocol, with two exceptions. These areas of non-compliance stem from difficulty with the Handover Protocol, relating to a lack of sufficient resource to implement the protocol fully.

The audit found the following areas for LNER to address:

- **LNER should develop an alternative process to the Handover Protocol and, subject to approval from ORR, trial this alternative process for assistance at its stations.** LNER describes the resource issues that it has encountered with implementing the Handover Protocol at its stations during peaks of call volumes and service frequency at through stations. LNER states that it cannot ensure compliance in this area. Having deployed the Passenger Assist Staff App to all staff, and trained them in its use, LNER is well-placed to trial its use in place of the phone-based Handover Protocol, for journeys between stations where LNER provide assistance. Following a specified trial period, LNER should report back to ORR and industry colleagues on the app's efficacy, and whether its use has improved reliability of **communication** and alleviated pressure on resource.

APPENDIX D – London North Eastern Railway

- **LNER should consider applying the principles of its safety management system as part of the drive for service improvement.** Using an existing process could help to embed in the culture that accessibility is an integral part of the business, rather than a special service. It could also help to ensure that systematic monitoring and management of accessibility risks, with appropriate governance for decision-making, and escalation thresholds.

- **LNER should explore solutions to technical limitations of telephones, that inhibit LNER's compliance with the Handover Protocol.** LNER states that its phone technology does not record the number of unanswered calls that have been diverted. This creates potential risks for Handover Protocol communication between stations. LNER should assess the risk that this creates, including investigation of any incomplete assistances where communication failure has been identified, and take appropriate steps to explore potential operational or technical solutions to this issue. While LNER will use the Staff App for booked assistance communications between stations where it manages assistance, it will still need to use the phone Handover Protocol for unbooked assistance, and journeys to or from stations managed by other TOCs.

[name redacted]   [name redacted]

ORR audit of Northern Trains' delivery of Passenger Assistance

Introduction

This is the summary report on the Northern Trains response to the Passenger Assistance audit, conducted by Best Practice Group (BPG) for the Office of Rail on Road (ORR) in September 2023. The audit focused on how five Train Operating Companies (TOCs) meet regulatory requirements associated with three aspects of assistance for disabled passengers:

1. Use of the industry-wide Passenger Assist system.
2. Implementation of the Handover Protocol.
3. The overall management system used by TOCs, including monitoring and assurance processes.

The full report has been shared with Northern Trains, who have had a chance to respond. This summary report identifies key findings and areas for improvement, and will be published by ORR.

Service characteristics and performance

Northern Trains operates regional train services across the North of England and parts of Southern Scotland. It is responsible for delivering assistance to passengers at the 465 stations that it manages (more than any other TOC). This includes some very large busy stations like Leeds (where Northern is also responsible for providing assistance for the services of other TOCs), but also a wide network of unstaffed stations where assistance is provided by onboard staff. Northern services also call at stations managed by other TOCs and Network Rail.

In 2022-23 there were 50,688 assistance bookings at stations managed by Northern (not including unbooked or 'Turn-Up-and-Go' assists). ORR's annual survey of booked assistance for 2022-23 shows that 11% of passengers did not receive any of the assistance that they had booked (compared with an industry average of 8%), with a Net Satisfaction score of 94% (industry average 95%). Both of these measures show a year-on-year improvement for Northern, although there is still room for improvement.

Key findings and areas for improvement

In its self-assessment, Northern stated that there were several elements where it was only partially compliant, mainly relating to the requirement to use the Handover Protocol for communication between stations. However, it should be noted that the Handover Protocol is not required where assistance at the alighting station will be delivered by onboard staff, as is the case at many Northern-managed stations.

Implementation of the PA Staff App was limited to a trial at Leeds, Manchester Victoria and Blackpool stations. This trial will soon be extended to three further stations.

The audit found some areas of good practice and innovation, particularly in terms of how Northern sought to improve its performance. Customer engagement via several channels, including post-journey and post-call surveys of passengers and call centre users, mystery shopping exercises, and engagement with disabled passengers through an accessibility user group and ad-hoc focus groups.

The audit found the following areas for Northern to address:

- **Northern should establish processes that enable conductors who are responsible for assisting passengers at unstaffed stations to receive information about advance assistance bookings.** The industry PA system exists to log assistance bookings and inform frontline staff about the assistance that they will need to provide. Onboard staff should have full information at the start of their shift about any advance assistance bookings that have been made for that service. Northern's audit response did not

provide assurance that this was the case, and we recommend that it prioritises remedying this. This is likely to require significant analysis, planning and effort from Northern, but is the minimum needed to deliver against the Accessible Travel Policy requirements.

- **Northern should continue to explore solutions to ensure that relevant information is communicated to frontline staff, for short-notice bookings that are made after the beginning of a conductor's shift, and for Turn-Up-and-Go assistance.** Noting the difficulties with rolling-out the Passenger Assist app to frontline staff who will be delivering assistance, Northern will need to consider alternative viable solutions to meet the ATP requirements for communication of short-notice assistance requests to frontline staff (both for bookings made after the beginning of a conductor's shift, and for unbooked Turn-Up-and-Go assistance requests). Booked assistance can be requested up to two hours before the journey, which may be after the relevant onboard staff has begun their shift, while unbooked Turn-Up-and-Go assistance can be requested at the station itself, often through use of a Help Point. Relevant staff need to be informed about assistance that passengers will be expecting them to provide. We note that Northern are trialling alternative systems for communicating with frontline staff. ORR would like these trials to be expedited, and the proposals put forward to them for review.

- **Northern should develop a solution for recording and reporting numbers for unbooked assistance.** Currently Northern does not have a robust system in place for recording the quantity of unbooked assistance delivered, or reporting this to ORR as part of its monthly core data returns. This is important for helping to understand passenger demand, and managing the service that it provides for disabled passengers accordingly. Northern are facing difficulties with implementation of the PA Staff App (which could potentially resolve this issue). Northern should therefore consider alternative solutions for generating usable data on the numbers of unbooked assistances that are delivered, both for its own internal monitoring, and for reporting to ORR.

- **Northern should consider applying the principles of its safety management system** as part of the drive for service improvement. Using an existing process could help to embed in the culture that Accessibility is an integral part of the business, rather than a special service. It could also help to ensure that systematic monitoring and management of accessibility risks, with appropriate governance for decision-making, and escalation thresholds.

[name redacted]   [name redacted]

APPENDIX F – Questionnaire and criteria

Introduction

This Appendix provides the information on criteria and methodology that was provided to all TOCs, with a copy of the self-assessment questionnaire that they were required to complete and return.

Part One: use of industry systems and processes.

Part One of the audit focuses on use of the industry-wide Passenger Assist system, and implementation of the Handover Protocol.

The Passenger Assist (PA) system is an industry-wide system and software used by all TOCs for logging customer bookings and generating a TOC's daily list of assistances. Use of the Passenger Assist system is a regulatory requirement. Pre-booked assistance is requested by customers at least two hours before travel. After this period customers are considered 'Turn up and go' (TUAG).

The Handover Protocol is a mandatory operational process, designed to ensure communication between stations where assistance is required. It sets out the information that must be communicated, and how, between station-based staff at origin and destination stations, and it is an ATP requirement for all TOCs.

In summary, TOCs must ensure that there is a dedicated telephone number and rostered 'Responsible Person' for each of its managed stations during hours of operation. The Handover Protocol also prescribes the information that must be communicated about the assistance, including: train service details, the assistance required, and relevant information about the passenger.

It should be noted that the scope of the Handover Protocol includes journeys where assistance at the destination station will be provided by station staff. This does not cover services, where assistance will be delivered by onboard staff.

APPENDIX F – Questionnaire and criteria

The table below outlines the compliance part of the audit. ORR have outlined the relevant parts of the ATP guidance. Using the response template, appended to this document, The TOC (a) self-assessed themselves as to whether it is compliant, partially compliant, or not compliant, (b) answered the corresponding question(s) and (c) provided relevant supporting evidence as appropriate. If the TOC believe it is partially or not compliant, it must state why this is the case and if it has plans in place to become fully compliant.

Question No.	ATP Section	Extract	Question	[TOC response]
1.	A1.2	c. [The TOC must] provide assistance, when booked in advance through Passenger Assist, at any station during the hours that trains are scheduled to serve that station	Please outline any exceptions that mean the TOC is not compliant including any issues with specific stations.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
2.	A1.2	d. ensure that, where assistance has been arranged in advance, TOCs assist passengers off a train at its final destination as quickly as possible, and within a maximum of 5 minutes, wherever reasonably practicable; passengers booking such assistance must be informed of this as part of the booking process (e.g. in a booking confirmation).	How does the TOC monitor compliance with the requirement to assist passengers off a train at their destination as quickly as possible? What factors does the TOC consider when determining whether it is reasonably practicable to meet the 5 minute requirement?	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
3.	A1.2	e. where assistance is to be provided by station-based staff, in order that staff at the boarding station are able to ensure that the passenger will be met by a member of staff at the alighting station, TOCs must provide a dedicated telephone number	What systems does the TOC use to ensure that this number is available to colleagues and industry partners? Is there a process in place if the number changes? Is there a dedicated number for each of the TOC's stations? Please provide a full list of numbers for the TOC's managed stations.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
4.	A1.2	e. and a member of staff responsible for receiving calls from staff	Who assigns responsibility and ensures that staff know? What is the process to manage when the staff member changes? Please provide evidence e.g. staff rotas or protocols.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]

Question No.	ATP Section	Extract	Question	[TOC response]
5.	A1.2	e. for every station that the TOC manages; assistance staff must also follow the handover protocol where it applies. In meeting these requirements all TOCs must follow the passenger assistance handover protocol technical guidance set out at Appendix C; this technical guidance does not apply where ORR has agreed an alternative process or technology, with equivalent functionality and effectiveness, may be used by the TOC.	How does the TOC monitor compliance with the handover protocol. Are there particular reasons or challenges that lead to (partial) non-compliance? What action does the TOC take if it finds a non-compliance?	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
6.	A1.2	f. provide assistance to disabled and older people who arrive at a station and require assistance to allow them to travel, but where assistance has not been arranged in advance, where reasonably practicable	How does the TOC monitor un-booked assistance? Please provide any analysis available.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
7.	A1.2	f. TOCs must provide clear and reasonable justification to passengers where assistance cannot be provided for any reason	Over the past 12 months, what circumstances have arisen where the TOC has said that it cannot provide assistance, and what were the reasons? Please provide examples of passenger communications as accompanying evidence. Generic issues and responses, not related to Passenger Assist, need not be reported, e.g. strikes. Issues that impede Passenger Assist and responses should be reported. The report wishes to find examples of good practice in this area. The query includes issues whilst the booking is still unconfirmed.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
8.	A1.2	f. where an TOC may be considering a change to train or station staffing levels, they must have clear measures in place to ensure that passengers who have not booked assistance in advance can still receive it in a safe manner. Within the context of the facilities available at stations, they must submit to the ORR an assessment of where passengers are most at risk	What is the process for assessing the passenger impact of change in staffing levels, with regards to assistance? What steps has the TOC taken, in the context of any previous staffing changes, to ensure that passengers can still receive unbooked assistance?	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]

Question No.	ATP Section	Extract	Question	[TOC response]
		of not being able to receive the required assistance, and of the plans to mitigate this risk.	It is understood that TOCs are in the process of working through EIAs for the DfT. The audit does not expect early sight of this work but a) the methodology for assessing such and b) examples where the process has been completed previously.	
9.	A1.2	h. when a passenger wishes to book assistance through Passenger Assist in advance to board from or alight to a part-staffed or unstaffed station, TOCs must consider the needs of the passenger and their intended journey; this must include consideration of the staffing levels on the train and at the station, the level of accessibility of the station to the passenger and the type of assistance being requested. TOCs may wish to use on-board staff, station staff or mobile staff - where such working practices are routinely operated or can be accommodated - to provide the assistance required.	If the TOC has alternative working practices in place for part-staffed or unstaffed stations, what analysis does it do to monitor demand and performance for these stations and services?\n\nIt is understood that TOCs are in the process of working through EIAs for the DfT. The audit does not expect early sight of this work but a) the methodology for assessing such and b) examples where the process has been completed previously.	Fully / Partially / Non-compliant (delete as appropriate)\n\n[Commentary and evidence]
10.	A1.2	i. work with other train and station TOCs, to agreed and established processes, to ensure that, where a disabled passenger's journey involves changes or connections with other TOCs' services, assistance can be arranged through Passenger Assist through a single point of contact. This must ensure that the booking allows the passenger sufficient time to make their connections.\n\nWhere reasonably practicable, assistance must be provided when trains are re-platformed at short notice and where aural and visual announcements are made at short notice. This may include sighted guidance for visually impaired people, for example.	How does the TOC manage the 'single point of contact'' requirement with its partners?\n\nPlease describe any risk factors that present challenges in meeting this requirement.	

Question No.	ATP Section	Extract	Question	[TOC response]
11.	A1.2	m. make every reasonable effort to ensure that disabled passengers can obtain a seat on a train, particularly where these are not reservable, and that wheelchair users are able to use wheelchair spaces. This includes clearly stating their policy on reserving priority seats. This may also include operating a priority seating card scheme. TOCs may also consider how companions and family members (with a particular focus on children when travelling with a parent who has booked assistance) can obtain a specific seat on the train close to the disabled passenger. Where assistance has been booked, but a specific seat or wheelchair space has not been reserved, this must be made clear to the passenger at the time of booking to avoid misunderstanding.	Please describe the steps that the TOC takes to ensure that disabled passengers can obtain a seat, and any specific challenges in this area.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
12.	A6.4	Where passengers have booked assistance in advance through Passenger Assist that, because of service disruption, is no longer valid, TOCs must set out how they will contact those passengers to provide information on the use of rail replacement services, discuss the individual needs and preferences of the passenger and make appropriate alternative arrangements (such as re-booking assistance). TOCs must also provide details of arrangements for assisting disabled people when disruption occurs with no advance warning.	What steps does the TOC take to fulfil this requirement, with regards to planned and unplanned disruption?	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]

Question No.	ATP Section	Extract	Question	[TOC response]
13.	Appendix C	1. Dedicated assistance telephone number for each station; a) All stations must have a dedicated assistance number for receiving calls relating to assistance provision. b) The station's dedicated assistance telephone number may be made available to the public or can be for operational use only. c) The dedicated assistance telephone number for a station must be made widely available to any station or on-train staff who interact with the station for assistance purposes e.g. by ensuring the number is available and accurate in relevant industry systems. d) The telephone line used for the dedicated assistance line must be capable of logging when calls are received to enable the TOC to audit communication as required e.g. can log when calls were received with precise times and dates. e) By exception, in the event no one is available to answer calls made to the dedicated assistance telephone number, the assistance number must either be: (i) temporarily diverted elsewhere or; (ii) have a recorded message in place explaining the assistance arrangements for that station at that time.	Please provide analysis and evidence supporting compliance with the process. How many incidents have there been in relation to item 1e? If any part of the process is not compliant, please explain why.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]

Question No.	ATP Section	Extract	Question	[TOC response]
14.	Appendix C	2. Responsible Person for assistance-related communications for every station; a) An TOC must ensure there is a rostered Responsible Person for each of its managed stations during hours when services are operating at the station. b) During periods when stations are staffed the Responsible Person for the station must be on-site. During periods when the station is unstaffed the Responsible Person may be in a remote location. c) The Responsible Person must have responsibility for ensuring calls to the dedicated assistance number are answered during times when trains are operating at that station. This means the Responsible Person may: answer calls to the dedicated assistance number themselves; delegate responsibility for this function to a colleague at that station; or by exception invoke the arrangements in 1e). d) The Responsible Person may or may not have direct responsibility for the delivery of assistance at the station.	Please provide analysis and evidence supporting compliance with the process e.g. rosters including cover for unmanned stations. If any part of the process is not compliant, please explain why.	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]
15.		3. Handover protocol for the communication of assistance information between stations; a) The handover protocol (see figure 1 overleaf) applies where assistance is to be provided by station-based staff at the passenger's alighting station. b) Where the handover protocol applies, it must be followed by station-based assistance staff at the passenger's boarding station, with the information pertinent to the passenger's assistance 'scenario' communicated to the passenger's alighting station.	How is this part of the service monitored? If any part of the process is not compliant, please explain why. How is the information stored and communicated at the destination station?	Fully / Partially / Non-compliant (delete as appropriate) [Commentary and evidence]

APPENDIX F – Questionnaire and criteria

Question No.	ATP Section	Extract	Question	[TOC response]
		c) The handover protocol information must be communicated to the alighting station by calling its dedicated assistance telephone number.		

APPENDIX F – Questionnaire and criteria

Part Two: Management Systems

The aim of Part Two is to understand more about the TOC's processes, procedures, systems, training, governance, and improvement plans. This will help ORR identify areas of good practice which can be used to share across TOCs and to identify risk areas which can then be improved upon.

This part of the audit included a section on "What Good Looks Like" (see below). This sets out the suggested evidence that TOCs could send us to support the audit. It is not meant to be set criteria that the TOCs must have, merely a view of what good might look like in this respect.

TOC answers and evidence submitted were reviewed by BPG with respect to the viability of the management system within the operational context that the TOC works in. The varied nature of the TOCs' different networks, structures and investments means that they will have different answers to the same question. An intercity service using predominantly mainline stations differs in need from a suburban 'commuter' system which then differs from a mainly county based service. Even within these three categories, workable solutions to support the Handover Protocol in particular can vary significantly. Viability in this section can be summarised as "Does the TOC understand its issues? Does it have processes, plans and the capacity to address them?" It was not within the scope to find improvements or to comment on each specific area but to identify if the TOC had the systems in place to effectively manage the process.

Part Two Management Systems; "What Good Looks Like"

Category	What Good Looks Like
Assistance/ handover/ failures/ near-misses	• Relevant TOC staff get up to date information on assistance requests so they can plan/act accordingly. • Customers are confident that their pre-booked assistance requests will be fulfilled • Handover Protocol obligations are fulfilled • Procedures in place to effectively deal with live issues
Passenger Assist App – Staff App	• Well documented processes for all staff using the app or where the app is not yet rolled out, a well-documented plan for doing so. • Documented design of the Staff PA app, how it will interface within the business, how it will be used by staff
Contact Centre/ Service Desk (or equivalent)	• Incident reporting and management system: A process for reporting and managing incidents related to accessibility and assistance services. This system should enable staff to quickly identify, escalate, and resolve issues that arise. • A Contact Centre/ Service Desk that is running to good industry practice, e.g. an ISO/ITIL/another audited process • The ability for customers to report issues across multiple channels such as phone, email, online chat, and social media, ensuring that these channels are accessible to people with different needs. • [For clarification: ITIL was originally an IT protocol but is now commonly used in Contact Centres to manage non-IT services; e.g. Retail; Local Gov. The ISO standards are much broader than IT services covering environmental standards to Quality Assurance to the vocabulary for tea. • If a TOC used such a standard or similar for Accessibility, then it would significantly increase the level of confidence internally and externally in the processes under scrutiny]
Continuous Improvement	• A continuous improvement plan that outlines the company's goals and strategies for enhancing assistance services, based on feedback, audits, and industry best practices. • Quality objectives that are defined, agreed by senior management and reviewed at least annually • Compliance and audit management: documented procedures for internal audits of the company's compliance with the Accessible Travel Policy. Regularly reviewed and updated policies and procedures based on audit findings.

APPENDIX F – Questionnaire and criteria

Category	What Good Looks Like
	• Feedback collection and analysis: Regular surveys (or interviews/focus groups) to customers with documented procedures to analyse feedback and act upon learnings. • Mystery shopper reviews with documented results, analysis, and improvement plans • Staff training and development: regular training for staff to ensure they are aware of the policy and can effectively assist passengers with disabilities or reduced mobility. Staff training records and annual appraisal training requirements. • Current & future priorities regarding travel assistance • A process for making positive changes in the business • Performance tracking and reporting: Track and report on key performance indicators (KPIs) related to assistance services, such as the number of requests received, fulfilled, and instances where assistance could not be provided. • A documented complaints procedure that outlines a route cause analysis process and links to improvement actions .
Return on Investment	• Management commitment and with a financial budget that allows for the effective delivery of assistance and continuous improvement • Systems are in place for assessing the return on investment of improvements for disabled passengers that follow good industry practice such as ROI Institute
Coordination and communication tools	• Established communication tools and protocols to facilitate effective coordination between different stakeholders (internal and external) involved in providing assistance services.
Governance	• Directors active involvement and accountability • At least an Annual corporate-wide senior management review meeting involving directors, key train managers, station managers etc • Maintaining up-to-date documentation - version control etc

V1.0   Page 27 of 27