

Improving the reliability of passenger assistance

Findings of cross-industry relevance arising from ORRcommissioned audits of five train operators



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Executive summary

Many disabled passengers need assistance from staff to travel by rail – this may include. for example, assistance with getting on and off trains (including deployment of ramps), moving around the station, or carrying luggage. Responses to our ongoing survey of passengers on their experiences of booked assistance show that overall satisfaction levels are high. However, assistance failures remain too common.

We commissioned audits of five operators focused on regulatory requirements related to the delivery of assistance. These audits looked at the use of the shared industry Passenger Assist system that operators must use for logging and managing assistance bookings, the use of the handover protocol that sets out communication procedures between staff at departure and destination stations, and processes for management oversight and continuous improvement.

The key findings for each individual operator are published alongside this document. The audits revealed some areas of good practice but also areas that operators need to address. We have asked each operator to respond to the key areas that have been identified for them.

This document draws together key findings that are of broader relevance across the industry as a whole and that we expect all operators to consider:

- Operators should adopt the Passenger Assist staff app, supported by appropriate staff training. The staff app enables improved reliability of assistance through enabling better communication between frontline staff, better resource planning, and more informed continuous improvement activities.
- Operators must comply with the handover protocol, including planning for how they will manage peaks in demand for assistance. Reliable delivery of assistance depends on clear and timely communication between departure and destination stations; the handover protocol sets out communications procedures that all operators must follow unless we have approved an alternative.
- Operators that depend on onboard staff to deliver assistance at stations should identify the particular risks associated with this approach and ensure mitigations are in place. This includes ensuring that staff are able to identify passengers who need assistance at stations, are aware of passengers that have been assisted onto the train by others, and that operational constraints are checked when assistance bookings are taken.

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- Operators bear a collective governance responsibility, as members of the Rail Delivery Group (RDG), to ensure that shared industry systems such as Passenger Assist and National Rail Enquiries enable them to meet the needs of their passengers. They must be proactive in engaging with RDG, and with each other, to establish clear and effective governance systems to discuss priorities and issues. And they must be proactive and committed to maintaining information accuracy and completeness on industry systems, including engaging with RDG where it is identified that system issues are causing challenges.
- Operators should review their internal accessibility risk-management processes and consider whether these need to be improved to ensure that risks to the delivery of assistance are managed proportionately and effectively.

We ask all operators to prioritise the key areas of focus set out in this report to secure better reliability in the provision of passenger assistance. More specific next steps are set out below, and we provide an update on progress in our Annual Consumer Report in July 2024.

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1. Introduction

- 1.1 We want disabled passengers to feel confident that the assistance they need to travel by rail will be available and reliable. We have been surveying passengers on their experiences of booked assistance on an ongoing basis since 2017, with findings published annually. Our research suggests that satisfaction levels are high, with over 90% satisfaction with the end-to-end assistance process, building on progress made over the last five years. However, assistance failures remain too common, with some operators consistently appearing to be less reliable than others. When assistance fails it significantly impacts on the well-being of passengers and their overall travel experience. To enable us to hold operators to account for their performance, we commissioned audits of how five operators are meeting the regulatory requirements related to the delivery of assistance. We focused on three specific areas (described further below):
 - The use of the shared industry Passenger Assist system that operators must use for logging and managing assistance bookings;
 - The handover protocol that sets out communication procedures between staff at departure and destination stations; and
 - Operators' processes for management oversight and continuous improvement.

The regulatory framework

1.2 All train and station operators must establish and comply with an Accessible Travel Policy (ATP) as a condition of their licence, setting out what they will do to help disabled people use the railway. Operators must secure ORR approval for their ATP, and we have issued guidance that defines minimum requirements, covering areas such as provision of assistance, staff training and passenger information. Passengers may either book assistance in advance (up to two hours ahead of the journey) or 'turn-up-and-go' (TUAG).

Shared industry systems that support assistance delivery, including Passenger Assist

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Passenger Assist is the shared industry software system for logging and managing 1.3 assistance requests, which all operators are required to use when passengers book assistance. It should facilitate both a good passenger experience when

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booking assistance and the reliable delivery of assistance by operators. The Rail Delivery Group (RDG) manages Passenger Assist on behalf of operators.

- 1.4 The Passenger Assist system can be used in a number of ways. Operators can make bookings on behalf of passengers (for example, when taking bookings over the phone), and can view and manage bookings through a desktop interface and a staff app. Passengers can also make and manage assistance bookings through either a customer app or a web form. This means, for example, that operators can monitor assistance requirements at each station throughout the day and allocate tasks to staff, regardless of how the passenger booked their assistance. The staff app is designed to help frontline staff support passengers better and, for example, enables staff to see assistance tasks that have been allocated to them, and to register when assistance has been delivered, whether booked or TUAG. The use of the staff app is not currently a regulatory requirement, and adoption and use vary between operators.
- 1.5 As well as development and maintenance of the Passenger Assist system, RDG also manages other shared industry systems that are needed for the reliable delivery of assistance. These include:
 - Stations Connect, an electronic directory of station contact details, which enables frontline staff to contact colleagues at other stations, and so comply with the handover protocol;
 - Knowledgebase, a database where accessibility information about each station is recorded for publication via the National Rail Enquiries website and other sites. This enables call centre staff to access relevant information when booking assistance for passengers, and passengers themselves to plan their journeys; and
 - A shared call centre for taking assistance bookings out of hours.

Handover protocol

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1.6 Reliable delivery of assistance depends on clear and timely communication between departure and destination stations, to ensure that staff are expecting the passenger at the destination and are aware of relevant information such as assistance needs or location on the train. To mitigate the risk of failed communication, ORR developed a handover protocol that operators must follow when assistance at the destination station will be provided by staff who are not onboard the train itself. The key requirements are for each station to have a

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dedicated phone number for assistance communications, and for staff at the departure station to call the destination station to communicate the information necessary to ensure that the passenger receives the assistance when they arrive. The handover protocol was developed with input from operators and disabled passengers, and is set out fully in ORR's ATP Guidance.

Management systems

- 1.7 As part of their ATP all operators 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.
- 1.8 This must include senior-level sponsorship for accessibility, and appropriate systems to ensure that the views and requirements of disabled passengers are taken into account as part of day-to-day operations and longer-term planning. Operators must also ensure that there are processes to monitor performance, including the investigation of complaints related to accessibility and assistance provision.

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2. **Methodology**

- 2.1 ORR selected five train operators that represent a range of different characteristics relevant to assistance provision, including:
 - Service type (long-distance, commuter or regional);
 - Staffing model (assistance provided by onboard staff, station staff or mobile assistance teams);
 - Level of maturity in implementation of the Passenger Assist staff app; and •
 - A range of prior performance in ORR's annual survey of the passenger experience of booked assistance.
- The five operators were East Midlands Railway (EMR), Govia Thameslink Railway 2.2 (GTR), Greater Anglia, London North Eastern Railway (LNER) and Northern.
- 2.3 ORR commissioned Best Practice Group (BPG) to conduct audits focused on the regulatory requirements related to the delivery of assistance. The audits used focused interviews with management personnel and a detailed self-assessment questionnaire, completed by operators and supported by evidence. The scope of the audits did not include operational compliance checks at stations, nor did it include an in-depth review of training materials or of the accessibility information available to staff or passengers (which are both areas monitored separately by ORR). The audits sought evidence of compliance through documented examples rather than specific detail for each individual station.
- 2.4 The operators were given the opportunity to comment on the draft self-assessment guestionnaire prior to completing it. BPG's initial analysis of the operators' submissions was shared back with operators to verify and clarify responses, and to challenge where there were any areas that were incomplete or inconsistent. BPG's final reports were also shared with operators prior to being finalised. Further detail on the audit process is included in the separate audit report summaries for each operator.

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Findings of cross-industry 3. relevance

- 3.1 The audit findings for each operator are set out in the BPG report, which is published alongside this document. We have asked each operator to respond to the key areas that have been identified for them, setting out the next steps planned or already taken - to improve the delivery of assistance. ORR will review individual responses from audited operators, and follow-up as necessary to secure the right outcomes for passengers.
- 3.2 The audits identify some key areas of broader relevance across the industry as a whole. We have identified these cross-cutting findings here:

Finding 1: Rollout of the Passenger Assist staff app.

- 3.3 Across the industry, operators are at different stages in the rollout of the Passenger Assist staff app, and this was reflected in our sample of five operators. GTR and Greater Anglia had completed rollout of the staff app by the time of the audit, along with delivery of relevant training for staff. LNER completed their rollout while the audit was being conducted, and BPG were able to attend a training session and observe first-hand the possibilities and constraints of the staff app's current functionality. EMR and Northern had not implemented the staff app beyond trials at specific stations or ad-hoc uptake by individual staff.
- 3.4 Use of the staff app is not a current regulatory requirement, but its potential benefits were apparent in the audit findings. Where the staff app was fully deployed, the audits identified fewer organisational risks to the delivery of assistance. This was because the staff app:
 - Mitigated risks associated with relying only on phone calls for communications between staff at departure and destination stations;
 - Provided a route for communicating with onboard staff responsible for delivering assistance; and
 - Provided management data that enabled better planning and management of the service, including follow-up on failed assists or passenger complaints.

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3.5 Operators noted that there was scope for further improvements to the functionality of the staff app that would further enhance the benefits, some of which are already

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in hand – including the ability for staff to amend bookings when, for example, passengers take an earlier train, or if assistance requirements have changed. Nonetheless the capability and reliability of the technology has advanced to the point where it is delivering clear benefits. We also note that the operational benefits grow as more operators take up the app because journeys that involve more than one operator can be supported more effectively.

Next steps

- 3.6 We want to see these benefits being realised across the industry, supported by appropriate training for staff, and using the enhanced management data to inform resource planning and continuous improvement activities.
- 3.7 All operators have recently reported to ORR on their progress with rollout of the staff app as part of the annual reporting required under the ATP Guidance. We are in the process of reviewing these responses and will consider whether any further regulatory requirements may be needed.

Finding 2: The handover protocol

- 3.8 Under the ORR ATP Guidance, operators are required to either comply with the handover protocol or agree an alternative process or technology with equivalent functionality and effectiveness with ORR.
- 3.9 Three of the operators we audited (EMR, LNER and Northern) reported challenges in ensuring (and assuring) consistent compliance with the handover protocol, particularly at their busiest stations and, in particular, at the busiest times. This in turn creates the risk that staff at destination stations will not always be aware that a passenger needed assistance.
- 3.10 During the audit process, and building on their rollout of the staff app, LNER proposed an alternative to the handover protocol that sought to mitigate the risks they had identified to compliance. Their proposed alternative used notifications delivered through the staff app instead of phone calls for communications between staff at departure and destination stations. Following a thorough assessment, ORR approved LNER's proposal for booked assistance journeys between stations where LNER is responsible for provision of assistance, for a trial period that ends on 30 April 2024.
- 3.11 This was the second alternative to the handover protocol that we have approved. In 2022 we approved the ATP for Arriva Rail London, who operate London Overground services. This included a proposal for telephone communication

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between stations to be via a central control centre (rather than direct calls from station to station as described in the handover protocol). We sought additional evidence on the effectiveness of this method, including a review of the processes for monitoring performance and a visit to their control centre, and agreed to this alternative approach in <u>our approval</u> of their ATP.

Next steps

- 3.12 The handover protocol is a regulatory requirement: unless an alternative has been approved, we expect all operators to comply, to be actively focused on reducing risks of non-compliance including at times of peak demand for assistance, and to take appropriate action to ensure delivery of reliable assistance.
- 3.13 In response to the audit findings, during 2024-25 ORR will conduct focused assurance work on the operation of the handover protocol at the busiest stations. We plan to focus on those <u>stations</u> that had over 8 million entries and exits in 2022-23 (except those stations where LNER is responsible for assistance delivery, which will be reviewed following their trial of an alternative to the handover protocol).
- 3.14 During April 2024, ORR will review evidence from LNER about the effectiveness of their trial, and determine appropriate next steps.
- 3.15 Where operators identify alternatives to the current handover protocol that could deliver equivalent or greater benefits to passengers who need assistance to travel, they should bring proposals to ORR where there is sound evidence to support the proposals.

Finding 3: Delivery of assistance by onboard staff

- 3.16 ORR's ATP Guidance acknowledges that operators may wish to use onboard staff to provide the assistance required by passengers, particularly at part-staffed and unstaffed stations. As in all aspects of the service that operators commit to in their ATPs, operators must monitor and evaluate their performance and maintain a focus on continuous improvement.
- 3.17 The handover protocol applies only where assistance is provided by station staff. Where operators use onboard staff to deliver assistance, we expect them to establish their own robust communication processes, supported by appropriate training and technology, to ensure that staff have the information necessary to provide passengers with assistance with boarding and alighting when they need it.

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- Most assistance is delivered by staff that are based at stations, but a small 3.18 proportion is delivered by onboard staff. Three of the operators that were audited (EMR, Greater Anglia and Northern) use onboard staff to provide assistance at some stations. Each operator noted that this model of assistance delivery incurs specific risks. In particular, challenges were identified in communicating with onboard staff to ensure they are aware of TUAG assistance requests, or assistance booked after their shift had started.
- As noted above, the staff app can provide a route for communicating with onboard 3.19 staff responsible for delivering assistance. It is notable that it was for the two audited operators that have not yet rolled out the staff app (EMR and Northern) that delivery of assistance by onboard staff was identified as a key area for action.

Next steps

- 3.20 In light of the risks identified on assistance provision by onboard staff, we are currently engaging with operators to assess where the most substantive issues lie and understand the mitigations that operators have in place. ORR has brought together the operators who use onboard staff to deliver assistance (Chiltern, EMR, Greater Anglia, Great Western Railway, Northern, ScotRail, South Western Railway, TransPennine Express, Transport for Wales Rail, and West Midlands Trains). Emerging findings include:
 - The need for onboard staff to be able to identify passengers waiting on the platform who need assistance, including those with non-visible disabilities, which some operators achieve through using marked boarding points on platforms and others by requiring onboard staff to step off the train and check for passengers;
 - The need for onboard staff to be aware of passengers who have been assisted onto the train by others. Some operators provide staff with a printed lists of booked assistance at the start of their shift, some have started to use the Passenger Assist staff app which gives staff access to up to date information as assistance requirements change during their shift; and
 - The need for robust booking processes that check for operational constraints (for example, onboard staff cannot provide assistance around a station). This should already be in place for all operators, supported by appropriate training for staff on the information sources they should check when processing assistance bookings, and robust maintenance of the accuracy of those information sources.

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3.21 We will continue to work with operators to identify risks and understand existing and planned mitigations. We will use our ongoing survey of the passenger experience of booked assistance to monitor industry performance, and to inform consideration of whether any further interventions are necessary.

Finding 4: Management of industry systems

- 3.22 During the audit process, EMR, GTR, Greater Anglia and LNER reported challenges associated with the functionality of shared industry systems maintained by RDG on behalf of operators, and the governance and management of these systems.
- 3.23 This included the Passenger Assist system. Operators noted that priorities for future phases of development of the Passenger Assist system varied across industry, driven by operators' different operating models, and there could be misalignment between their own business needs and joint industry decisions.
- 3.24 Operators also mentioned difficulties with ensuring that there was up-to-date and consistent information on two other industry systems managed by RDG: Stations Connect and Knowledgebase (see introduction for background information).

Next steps

- 3.25 Operators bear a collective responsibility, as members of RDG, to ensure that shared industry systems enable them to meet the needs of their passengers. They must be proactive in engaging with RDG, and with each other, to establish clear and effective governance systems to discuss priorities and issues. Where they have specific issues then they should raise these through the appropriate forum, and take responsibility for follow-up and, where appropriate, escalation.
- 3.26 Operators are responsible for ensuring that information (for passengers and staff) on industry systems is correct. They must be proactive in maintaining information accuracy and completeness, and in engaging with RDG where it is identified that system issues are causing challenges. ORR will increase its focus on driving up the quality of station accessibility information provided by operators in 2024-25.

Finding 5: Operators' risk-management processes

3.27 Where an operator has a good understanding of its risks related to accessibility provision they are better placed to manage them effectively. This is particularly true because risks associated with the provision of assistance in rail are often not

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within the control of a single operator. Operators need to be able to explore these risks with industry colleagues.

3.28 The auditors recognised GTR's tailored use of its 'zero harm' safety risk management system as being an example of good practice and innovation that helped GTR to identify and remedy the root-cause risks that may contribute to accessibility issues.

Next steps

3.29 To facilitate the effective monitoring and management of accessibility risks operators should review their internal accessibility risk-management processes, and consider whether these need to be improved to ensure that risks to the delivery of assistance are managed proportionately and effectively. ORR will require operators to provide an update on their work in this area in their submissions for the January 2025 annual ATP review process.

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4. Next steps

4.1 ORR has shared the individual audit reports with each of the five audited TOCs, requiring them to inform us of the actions that they will take in response. We have identified specific actions in this report that take forward findings of cross-industry relevance. We will provide an update on progress as part of our Annual Consumer Report in July 2024.





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