

Jacqui Russell
Head of Consumer Policy
Email ATP@orr.gov.uk



Gwendoline Cazenave
Chief Executive Officer
Eurostar International Limited
By email

18 November 2024

Dear Gwendoline

Revision of Eurostar International Limited's Accessible Travel Policy

Thank you for submitting a proposal to amend Eurostar International Limited's Accessible Travel Policy (ATP), regarding the provision of assistance for passengers at London St Pancras station. Following engagement with Eurostar and stakeholders, I can confirm that ORR is now able to approve Eurostar's revised policy.

The amendment in question is inclusion of the following new text within the section of the ATP policy document and passenger leaflet referring to assistance at London St Pancras station:

"If you are a wheelchair user customer travelling in your own manual wheelchair without a companion and you need assistance boarding or getting off the train, we will always look to assist you onboard in your own wheelchair.

In order to be able to do this we will need you to arrive with your wheelchair in a good state of repair and working normally.

By this we mean that the tyres are inflated, the brakes work, the footplate (if applicable) and the handlebars are stable and also that there are no broken parts or items hanging at the back of the wheelchair."



In approving this change we followed the process for making material change to an ATP that is set out in ORR's ATP [Guidance](#).

Please update your ATP documents and any relevant website information to include the approved text. You have already confirmed that training is in place to ensure that relevant staff are informed and equipped to implement this policy.

Background and policy development

ORR [approved](#) Eurostar's initial ATP in October 2023, having followed the approval process set out in ORR's ATP Guidance. During this process Eurostar did not refer to any restrictions for passengers travelling in their own manual wheelchairs at London St Pancras or elsewhere.

In April 2024 a complaint was [published](#) in the media, describing a wheelchair-user's experience with Eurostar. They had received assistance at Paris Gare du Nord, but when they requested wheelchair assistance on their arrival at London St Pancras, and later departure from the same station, they were on both occasions asked to transfer to the station wheelchair. The passenger eventually received the requested assistance in their own wheelchair but found the experience distressing and humiliating.

We asked for an explanation from Eurostar, and established that there was an operational policy in effect at London St Pancras that required passengers travelling in their own manual wheelchair to transfer to a station wheelchair if they wanted assistance from staff. Eurostar had not previously made us aware of this policy.

Our ATP Guidance requires any restrictions on the use of wheelchairs to be set out within an operator's ATP. We therefore asked you to review your operational policy and, if deemed to be necessary, to submit a proposal for a revision to your ATP in accordance with the procedure for a material change set out in our guidance. We noted some specific concerns with the operational policy, including the risk of creating barriers to travel for disabled people who could not easily or safely transfer to and from a station wheelchair.

Eurostar submitted an initial proposal for a change to its ATP on 15 July 2024. In this letter you made clear that an interim revision to the operational policy had been implemented and that since 8 May 2024 passengers had been assisted in their own wheelchairs wherever possible. The proposed new ATP text read: "When a wheelchair user customer is travelling in their own manual wheelchair without a companion and they need assistance boarding or getting off the train they are required to ensure that their wheelchair is in a good state of repair and working normally. If assistance is required, and the condition of the wheelchair means that

there is a risk of injury to the wheelchair user or our employees / partners we reserve the right to refuse assistance”.

ORR reviewed this proposal with input from expert stakeholders DPTAC, London TravelWatch and Transport Focus, in line with our standard process for considering material ATP changes. The proposal was considered to be an improvement on the previous operational policy as it would generally enable passengers to be assisted in their own wheelchairs.

However, we had concerns about some aspects, in particular:

- A lack of clarity for passengers about the ‘good state of repair’ requirements
- No clear statement that Eurostar would seek to provide assistance in the passenger’s own wheelchair, as the starting presumption
- Potential mitigations that might help to ensure that a passenger could receive assistance in their own wheelchair
- Assurance about appropriate training for staff, to ensure familiarity with the policy and that a check would be carried out with sensitivity

We therefore wrote to Eurostar on 15 August, with a request to reconsider its proposal. If Eurostar still wanted to propose new text, then we asked for further information to provide a fuller justification. Any subsequent assessment by ORR of new text would look for evidence that Eurostar had addressed these points.

Eurostar submitted the text that is set out on the first page of the letter to us on 2 October 2024. The revised text addresses the first two concerns above directly: it describes what is meant by a good state of repair and states the intent to assist passengers in their own wheelchair. To address the third concern, you confirmed that new processes and mitigations had been implemented to support the new policy, including ‘dual pushing’ where two members of staff push a wheelchair together. You also provided confirmation that staff would be trained to implement the new policy, including assurance that staff would treat any safety check with appropriate sensitivity.

You told us that since May 2024 there had been three instances where a wheelchair had not met the requirement to be in a good state of repair. In all cases this was due to the lack of a footplate and the passengers had received assistance in the station wheelchair. We note the responsibility that Eurostar has to ensure the health and safety of both passengers and staff, and that there may therefore be reasonable requirements relating to the condition of the wheelchair.

We shared the revised text with DPTAC, London TravelWatch and Transport Focus and no new concerns were raised.



Conclusion

In approving Eurostar's amendment to its ATP we recognise the improvement against the previous operational policy: Eurostar will always look to assist passengers onboard in their own wheelchair.

Please update your ATP documents and any relevant website information to include the approved text as soon as possible. Please provide confirmation, with an electronic copy of the revised documents, when you have done this.

Yours sincerely,

Jacqui Russell

Jacqui Russell