Improving Assisted Travel:
a consultation

Contents

Executive summary

1. Access to public transport is for many a necessity of everyday life. We recognise the importance of the rail network being open to everyone. Our vision is to empower confident use of the railway by all. Whilst our core responsibility is to ensure that the law is met and standards adhered to, we believe the commitment to accessibility is wider than this narrow remit.

2. This vision is good for the rail industry and good for rail businesses. Nevertheless, we recognise that in some instances there will be business costs and these costs must be proportionate in order that the change which is achieved is sustainable.

3. The demand from passengers for Assisted Travel[1] is increasing. In 2016-17, 1.2 million requests for assistance were booked by passengers to help them complete their journeys, a rise of 4.4% compared to 2015-16 (1.1 million booked assists)[2]. The overall number of passengers seeking travel assistance will be considerably higher than this figure;

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[1] Those using booked assistance Passenger Assist, and spontaneous travel 'Turn up and go'.

[2] We define assists as the number of assists which have been requested through the Passenger Assist system. Passenger bookings relate to the number of bookings made through the Passenger Assist system. For each booking there can be several assists requested.

many passengers will have travelled without booking assistance in advance but will have received assistance.

4. It is important that we understand the quality of service given to passengers who are making use of Assisted Travel in increasing numbers. Our large-scale programme of consumer research found that:

Awareness of Assisted Travel is low; 70% of potential Passenger Assist, and 80% of potential 'Turn up and go' users said they knew nothing about it. Of those who did know about it, the most common ways they became informed was in person via rail staff and through 'word of mouth'. Two-thirds of those who had not used Passenger Assist, and almost half of those who had not travelled via 'Turn up and go' said that now they were aware of it they would be likely to use the service in the future.

User experience & reliability. 71% of 'Turn up and go' mystery shoppers said they would recommend the service to other people with the same disability as them. Satisfaction amongst users of Passenger Assist was high with 85% saying they were satisfied or very satisfied. However, confidence that all the requirements they had booked will be met falls to 72%, and around one in five users did not actually receive all aspects of the assistance they had booked.

Staff helpfulness. Most 'Turn up and go' mystery shoppers in our research, 78%, said staff were positive and happy to assist. However, whilst satisfaction from Passenger Assist users with aspects of a staff member's performance ranged from 76%-81%, staff were sometimes unable to spot those passengers with hidden disabilities[3] and were generally perceived to be less adept at assisting passengers with these types of impairment. The Passenger Assist research showed that one in four of those with hidden disabilities were less likely to receive the assistance they had booked, compared to the average (81%).

Monitoring. Some Assisted Travel users felt, mainly expressed through their qualitative feedback, that the problems they experienced with the reliability of assistance or staff helpfulness were not helped by an apparent lack of accountability for assistance failures.

5. This large-scale research exercise has provided us with a robust evidence base to draw upon in identifying where arrangements for Assisted Travel can be strengthened. In this document we seek views on potential improvements in the following areas:

   ■ The research findings demonstrate that there is a lack of **awareness of Assisted Travel** and a significant untapped demand for the services. We have set out how

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[3] Passengers whose disability is not immediately apparent.

awareness might be improved. This could include making written material achieve crystal mark standard, widening the age profile of users for example better targeting of certain age groups through the use of social media, proactively engaging and partnership with third party advice agencies to promote the services, and targeted awareness raising of particular services. We seek views on how improvements might be achieved.

- The results of the research highlight the importance users place on Assisted Travel and the vital role it plays in making the railway accessible. We have explored how the **reliability of Assisted Travel** could be improved. This could include developing a cross-industry protocol to achieve a seamless end-to-end journey, and the introduction of redress where the service fails. We ask how the reliability of Assisted Travel might be improved.

- The research results highlight the importance of ensuring that company staff are equipped with the necessary skills to identify those who may need assistance and to offer that assistance in the right way. We explore some of the options for how **staff training could be strengthened**. This could include mandatory adherence to the DPTAC training framework and independently verifying the quality of training. We seek views on how training for staff could be improved.

- The research has highlighted the case for **enhancing our existing monitoring** activity. We set out how we will broaden our data collection, and our intention to continue with our Passenger Assist performance tracker survey for the next year at least. We ask how we might further strengthen our monitoring of how well licensees are meeting their obligations.

- Finally, we set out arrangements for updating the DPPP guidance particularly in the areas of terminology and language, and our approach to future annual reviews of DPPPs where there have been no material changes to the rail operator's DPPP.

Background

ORR's role

6. ORR's role in this area is to approve, and monitor compliance with, mainline train and station operators' policies on accessibility. We can also require operators to review their policies and to make changes to these or the manner in which they are implemented. More widely, we collect, monitor and publish information on rail industry performance on accessibility. We also have duties under the Equality Act 2010. These include a duty to have regard to the need to eliminate unlawful discrimination and advance equality of opportunity (among other things).

7. We publish guidance for rail operators on how they should write their Disabled People's Protection Policy[4] (DPPP). The guidance (which is summarised where relevant in the following chapters of this document) sets out what commitments are expected from them, and the information they need to provide in the DPPP. It sets out the minimum requirements for rail operators which we would expect they will seek to exceed. We approve rail operators' DPPP policies against this guidance. We also carry out annual reviews of rail operators' DPPP, most recently in 2016. Where we have identified good practices in the last review, we have shared these in this document.

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[4] http://orr.gov.uk/__data/assets/pdf_file/0015/5604/how-to-write-your-dppp.pdf

8. We use our monitoring data and carry out research to develop a clear evidence base on accessibility, taking forward our findings with stakeholders, identifying areas for improvement and addressing weaknesses.

9. Where licensees are not complying with their obligations, we have powers to take enforcement action. Our strong evidence base drawn from our monitoring data and research allows us to consider taking action where we deem it proportionate to do so. To provide clarity to licence holders, and others, we have in place an economic enforcement policy and penalties statement[5] which provides an overview on how we will monitor and investigate possible breaches, as well as the options available to us when taking enforcement action. Our approach to enforcement is guided by the principles in this statement.

10. We publish and promote the findings of our work in our annual consumer report, Measuring Up[6], so that progress and weaknesses in accessibility are transparent. Providing transparency in performance provides an opportunity for rail operators to demonstrate how they are helping people with

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[5] http://orr.gov.uk/__data/assets/pdf_file/0018/4716/economic-enforcement-statement.pdf

[6] http://orr.gov.uk/__data/assets/pdf_file/0007/25297/measuring-up-annual-rail-consumer-report-july-2017.pdf

a disability or impairment and strengthens the incentives on them to deliver better outcomes.

Statutory obligations on rail operators

11.   Train and station operators are required by their operating licences to establish and comply with a DPPP which must be approved by ORR. Amongst other things, a DPPP sets out the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use.

12.   Rail operators are required to set out in their DPPP arrangements for providing assistance to passengers; both those passengers who book assistance in advance, and where reasonably practicable, those who want to travel at short notice without pre-planning (often referred to as spontaneous travel or 'Turn up and go').

Roles of other statutory bodies

13.   The Department for Transport (DfT) and Transport Scotland also set accessibility requirements in rail franchise contracts and publish a joint code of practice on accessibility, Design Standards for Accessibility Railway Stations[7] . ORR is responsible for enforcement of the code. The DfT has recently published a draft Accessibility Action

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[7]

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/425977/design-standards-accessible-stations.pdf

Plan[8] consultation document which seeks to address the gaps in existing accessibility provision, and outlines how it intends to build on the progress made to date.

14.   Transport Focus is the independent, statutory body established to represent the users and potential users of the railways. It produces advice and information about Assisted Travel, and facilitates a national accessibility forum[9] to discuss research and best practice. London TravelWatch is the independent, statutory watchdog for transport users in and around London. Both Transport Focus, and where appropriate, London TravelWatch must be consulted when DPPPs are being established or material changes are made.

15.   The Disabled Persons Transport Advisory Committee (DPTAC) advises the government on transport legislation, regulations and guidance and on the transport needs of disabled people, ensuring disabled people have the same access to transport as everyone else. In 2008, DPTAC produced a Framework for Disability Equality and

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/638404/accessibility-action-plan-consultation.pdf

9 https://www.transportfocus.org.uk/advice-and-complaints/faq/passenger-focus-and-accessibility/

Awareness Training for Transport Staff[10]. The DPPP guidance document suggests that rail operators may wish to refer to the Framework for guidance and good practice on staff training.

16. The Rail Safety and Standards Board (RSSB) brings together members (infrastructure managers, train operators, rolling stock leasers and suppliers) from across the mainline railway to support shared decisions, products and services with the aim of driving out unnecessary cost, improving business and safety performance and developing long-term strategy. Its primary objective is to support its members to achieve their objectives of improving safety and performance and value for money across the industry.

Accessibility research

17. In 2016-17, 1.2 million separate assistances were booked by passengers to help them complete their journey, a 4.4% increase compared to 2015-16. There is limited information available to demonstrate the level of service that these passengers receive. Therefore, over the past year we engaged external agencies to undertake a large-scale programme of consumer research. Through this we have sought to assess:

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[10]
http://webarchive.nationalarchives.gov.uk/20080731162545/http://www.dptac.gov.uk/education/stafftraining/pdf/trainingframework-nontabular.pdf

i) *Passenger awareness of Passenger Assist and Turn-up-and-go services.* Telephone and online surveys were carried out with 1000 people, both users and non-users of rail but who would require support when travelling by train.

ii) *Fulfilment of and satisfaction with the Passenger Assist Service[11].* Over 4000 recent users of Passenger Assist were surveyed to understand more about typical users of the service, their experiences, needs and preferences.

iii) *Passenger experiences of Turn-up-and-go services across GB.* 59 members of the public were asked to act as mystery shoppers by seeking assistance to travel without having booked this in advance. This resulted in 318 mystery shops, covering all operators and the majority of Network Rail managed stations.

18. The results of this research have been published alongside this consultation. High-level findings, where relevant, are summarised in this consultation document.

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[11] It should also be noted that we have extended this research to include a qualitative phase that is currently underway. This involves in-depth interviews with 20 Passenger Assist users and 20 rail staff who are responsible for providing assistance in stations to allow us to probe more deeply some of the issues we identified in the quantitative phase. This qualitative research is planned to be published in December 2017.

19. This year we also carried out a review of the information provided online by train operators to ensure it is accessible and clear in promoting the assistance available, and communicates effectively with passengers who may have different communication needs. We assessed:

   i) The technical accessibility of websites using both screen reader and magnification technology; and

   ii) The navigability, readability and content of websites with a particular focus on the provision of information for those with cognitive impairments.

20. The results of these website reviews were published in our annual consumer report, Measuring Up, in July 2017.

21. We are aware that there has been considerable research in this area over a number of years. This has provided a lot of valuable and interesting information. We are unable to cover every research publication here but some recent examples include: Transport Focus "Passenger Assist 2014"[12]; RSSB "How data sources could be used to

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[12] https://www.transportfocus.org.uk/research-publications/publications/passenger-assist-summary-report/

assist passengers with special needs and/or disabilities"[13]; RDG "The Future of Accessible Rail"[14]; and Papworth Trust "Improving rail travel for disabled passengers"[15].

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[13] https://www.rssb.co.uk/research-development-and-innovation/research-and-development/research-project-catalogue/COF-ICE-04

[14] https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981

[15]

http://www.papworthtrust.org.uk/sites/default/files/Improving%20rail%20travel%20for%20disabled%20passengers%20in%20Britain.pdf

Scope of the document

22.   In this consultation we seek views on the four key areas we have identified for improving Assisted Travel and the possible options for how each might be taken forward. Our proposals support ORR's strategic objective of Better Customer Service. In particular:

- Chapter 1 - we ask for views on how passenger awareness of Assisted Travel might be increased;

- Chapter 2 - we highlight the user experience of Assisted Travel and ask what action could be taken to improve the reliability of assistance for passengers;

- Chapter 3 - we seek views on how training for company staff could be strengthened;

- Chapter 4 - we highlight how we are strengthening monitoring of Assisted Travel and seek views on how this may be improved further; and

- Chapter 5 - we set out our approach to reviewing the DPPP guidance and future reviews of train companies DPPP's.

23.   This consultation seeks views on potential improvements to Assisted Travel for which we have a robust evidence base. It does not include matters which are longer-

term improvements dealt with by franchise agreements such as reducing the notice required for booking assistance or investment in infrastructure.

24.   Notwithstanding that chapter 5 sets out our intention to bring the DPPP guidance up to date, this is not intended to serve as a wider review of the guidance. We are also cognisant of the proposals in DfT's draft Accessibility Action Plan and will seek to avoid any overlap in proposals.

Next steps

25.   Responses to this consultation are invited by 31 January 2018 and should be sent in writing or by email to:

Consumer Policy Team
2nd Floor
Office of Rail and Road
One Kemble Street
London
WC2B 4AN

Email: DPPP@orr.gsi.gov.uk

26.   We plan to publish all responses to this consultation on our website.

27.   Should you wish any information that you provide, including personal data, to be treated as confidential, please be aware that this may be subject to publication, or release to other parties or to disclosure, in accordance with the access to information regimes. These regimes are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004). Under the FOIA, there is a statutory code of practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

28.   In view of this, if you are seeking confidentiality for information you are providing, please explain why. If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on ORR.

29.   If you are seeking to make a response in confidence, we would also be grateful if you would annex any confidential information, or provide a non-confidential summary, so that we can publish the non-confidential aspects of your response.

30.   Following consideration of the responses we will publish a document setting out the way forward for improving Assisted Travel.

31.   The Office of Rail and Road (ORR) has actively considered the needs of blind and partially sighted people in accessing this document in PDF format. The text is available in full on the ORR website, and may be freely downloaded. Individuals and organisations can use free Adobe Reader accessibility features (such as Read Out Loud) to read the contents of this document. If you need conversion into any other accessible formats please contact us at cct@orr.gov.uk.

1. Chapter 1- Raising passenger awareness

Summary

1.1 In this chapter we set out our initial thinking on how passenger awareness of Assisted Travel might be increased. We seek views on whether and how the options we present could be taken forward as well as asking what other ways may be available to increase awareness.

Introduction

1.2 There are a number of obligations with which rail operators have to comply to ensure that disabled passengers are provided with any information that is likely to be of direct relevance to them.

1.3 The DPPP guidance[16] requires each rail operator to produce a customer-facing leaflet (the "passenger document") titled "Making rail accessible: helping older and disabled people". This document should provide passengers with details of services and facilities, how they can get these services and the standards of service they can reasonably expect, as well as what happens when services are disrupted. Rail operators must also produce a general policy document (the "policy document") titled "Making rail accessible: guide to

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[16] http://orr.gov.uk/__data/assets/pdf_file/0015/5604/how-to-write-your-dppp.pdf

policies and practices". When designing these documents operators have to consider issues such as font size, typeface, layout, colour contrast and use of images and branding to ensure that they are accessible to the widest range of people.

1.4 Once the DPPP is approved, copies of the passenger document must be provided on leaflet racks and at ticket offices at all staffed stations called at by their services. They also have to make this available on their website in Word and PDF. They also have to make their policy document available on request, free of charge.

1.5 Within the passenger document rail operators should set out clearly what assistance they can and cannot offer.

1.6 Rail operators are expected to actively promote the availability of their DPPP, with a particular focus on the passenger-facing document. As well as those requirements noted above, this includes promoting the passenger document via station advertising, on trains, and giving copies to public sources of information such libraries, travel information centres, and Citizens Advice Bureaux.

1.7 In 2014 ORR carried out targeted research[17] of 350 people, 63% with a disability and 37% carers, via an

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[17] http://orr.gov.uk/__data/assets/pdf_file/0010/11710/disabled-travellers-rights-awareness.pdf

online and telephone survey including 10 in-depth interviews. The results showed that fewer that one in 10 respondents had heard of Passenger Assist. Of those who had not heard of it before, 88% said they would or probably would use it in future.

1.8 As noted earlier in this document, we have repeated this research on a larger scale with a robust methodology and quotas to ensure a good spread of disabled adults and carers by age, gender, impairment type, and region.

Research highlights - awareness

1.9 Our latest research found that awareness of Passenger Assist remained low. 70% of respondents said they knew nothing about it and 54% said they had never heard of it.

Awareness of Passenger Assist

- ■ Heard of and know a lot
- ■ Heard of and know a little

■ Heard of but know nothing
- ■ Never heard of
- ■ Don't know

NET: Know something (27%)	NET: Know nothing (70%)	NET: Heard of (43%)
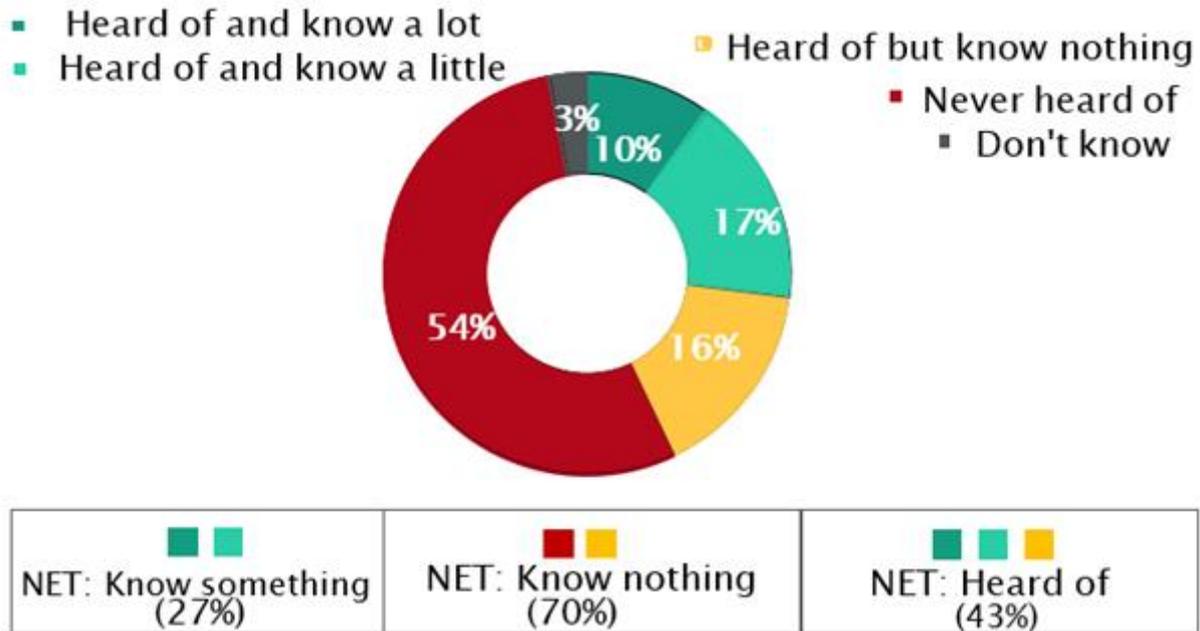
1.10 The awareness amongst respondents of being able to spontaneously travel (where reasonably practicable) via 'Turn up and go', was lower than for Passenger Assist. 86% said they knew nothing about it and 81% said they had never heard of it.

Awareness of Turn-up-and-go

- Heard of and know a lot
- Heard of and know a little
- Heard of but know nothing
- Never heard of
- Don't know

Total

| 4% | 7% | 5% | 81% | 3% |

0%   20%   40%   60%   80%   100%
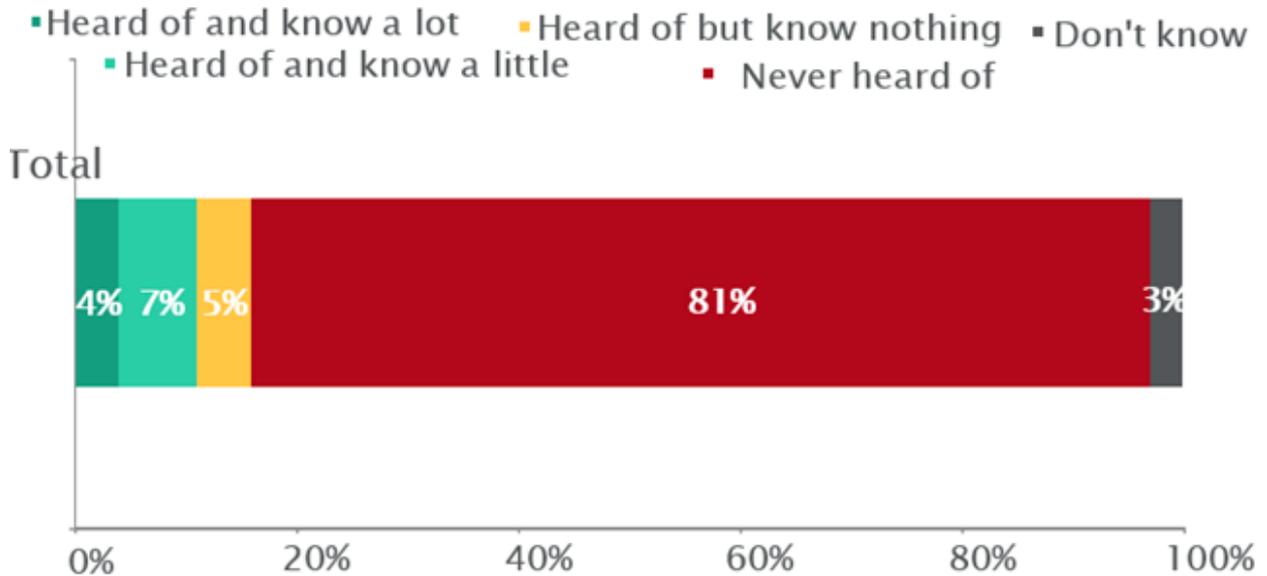
1.11 Of those respondents who said they were aware of Assisted Travel, the main ways in which they found out about it was in person via rail staff or friends, family, and carers.

How those 'aware' of Assisted Travel became informed

Information sources for Passenger Assist   **Information sources for 'Turn up and go'**

Information source	Passenger Assist	Turn up and go
A member of train or station staff in person	31%	27%
A friend, family member or carer	30%	22%
Train company or Network Rail website	29%	20%
A member of train or station staff over the phone	24%	18%
A leaflet or information booklet	17%	16%
Online publication (e.g. blog, online article)	13%	10%
Social media (e.g. Facebook, Twitter)	9%	19%
TV	9%	16%
Newspapers or magazines	9%	12%
Other	9%	6%
None of the above	11%	20%

1.12 Two-thirds of those who had not used Passenger Assist, and almost half of those who had not travelled via 'Turn-up-and-go', said they would be likely to consider it in the future now they had been made aware of it.

Likelihood of using Passenger Assist in future

	TOTAL (All respondents) – n=1,000	All respondents who have used Passenger Assist – n=140	All respondents who have <u>not</u> used Passenger Assist – n=860
NET: Likely	65%	96%	60%
NET: Unlikely	25%	1%	28%

NET: Don't know	10%	2%	12%

Likelihood of using Turn-up-and-go in future

	TOTAL (All respondents) – n=1,000	All respondents who have used TUAG[18] – n=57	All respondents who have not used TUAG – n=943
NET: Likely	52%	96%*	49%
NET: Unlikely	34%	4%*	36%
NET: Don't know	14%	–	15%

1.13 These research findings demonstrate that there is a lack of awareness of Assisted Travel and a large untapped demand for the services. Improving awareness of, and access to, information allows passengers to make informed decisions about their journeys and to

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[18] *Denotes low base size

travel with greater confidence. User satisfaction, which we explore further in chapter two, is relatively high for both Passenger Assist and 'Turn up and go'. Taken together, the results provide a robust evidence base from which to recommend that action be taken to increase awareness of Assisted Travel. We consider below some areas where improvements might be targeted.

Possible areas for improvement – written material

1.14 Whilst the research showed that passengers would like to receive information via a range of channels, the preferred method for receiving information about Assisted Travel was via a leaflet or booklet. As noted above, rail operators are required to make their passenger-facing document available on leaflet racks and at staffed stations. However, less than one in five respondents in the research said that this was how they found out about Assisted Travel. This suggests that either this information is not being consistently provided or displayed or that it is not sufficiently prominent or accessible to passengers.

1.15 At a basic level, there is a need to ensure that the DPPP passenger-facing booklet is consistently available at ticket offices and staffed stations. Thereafter, it is important that the quality of these communications is high. We note that some rail operators already provide

an easy read version of their booklet. Some others have also had their passenger document assessed by The Plain English Campaign in order to receive Crystal Mark standard. The Plain English Campaign reviews the document with the purpose of making the text clearer and easier to access, whilst retaining all the required information. The Crystal Mark is awarded as a mark of the document's clarity when the required standard is met.

1.16 Placing booklets in leaflet racks at staffed stations requires passengers to know that information that might be of use to them is available. It may therefore be helpful if other promotional material is also used. For example, placing posters in stations and on platforms in clear and understandable language highlighting the availability of Assisted Travel may be a successful way of bringing the service to the attention of passengers. Clear written material also has a role to play in the wider dissemination of information with third-party agencies which we explore later in this chapter.

Consultation questions

Q1. How can rail operators improve the availability and promotion of Assisted Travel information in stations?

Q2. Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

Possible areas for improvement – on-line material

1.17 We have explored above how written material might be improved and this information should be readily available on rail operators' websites. We have also conducted two independent reviews this year of the information provided online to ensure it is accessible and clear in promoting the assistance available, and communicates effectively with passengers who may have different communication needs. These results were shared with rail operators and published in our annual consumer report, Measuring Up, in July 2017.

1.18 The DPPP guidance requires rail operators to work towards achieving W3C website accessibility standards. In order to improve the accessibility of websites for customers with visual impairments, we understand that some operators have added tools such as 'Recite Me' and 'Speak Me' to their websites. The use of these applications could support awareness raising of the assistance available by ensuring that users of screen reader technology or those with visual impairments can access the information available online.

1.19 Some operators have also adopted the auditing and testing of websites by charities such as the RNIB or The Shaw Trust or by user groups as a way to improve website accessibility.

1.20 The age profile of users of Assisted Travel is largely older, with 53% in our research sample of actual users of assistance services being 65 years or older and 54% being retired. Only 10% of the research sample of actual users of assistance services were 34 years of age or less. There is an opportunity to consider how the age profile of users can be widened. The latest Office of National Statistics social networking data[19] published in August 2017 showed that in the last three months 96% of 16-24 year olds and 88% of 25-34 year olds had used social media. This demonstrates that traditional methods of engaging with this age group may not be successful. The proactive use of blogs and social media such as Twitter and Facebook may be a way of increasing awareness and widening the age profile of Assisted Travel users.

1.21 The opportunity to book Assisted Travel should be easily available on rail operator's websites. Providing information on the home page or within no more than

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[19]

https://www.ons.gov.uk/peoplepopulationandcommunity/householdcharacteristics/homein ternetandsocialmediausage/adhocs/007401socialnetworkingbyagegroup2011to2017

one-click of it either directly or via an easily understandable term would appear to be appropriate. Whilst some rail operators already do this for example having Assisted Travel on the homepage or drop down menus from terms such as 'Help and support' or 'Travelling with us', not all rail operators make this information easy to find.

1.22 The ticket buying process provides the chance to offer Assisted Travel. Some passengers go through the process without considering whether the rail operator is able to meet their needs. Linking ticket buying with an option to book Assisted Travel may help in raising awareness of the service.

1.23 We note that there is commonality across many of the rail operators with regard to the type of information sought on websites when a passenger is making an assistance booking. However, it is not clear whether this has been tested with passengers to ensure that it is easily understood. For example, the assistance request form asks for the type of assistance required but the drop down menu options the passenger then selects from refers to the type of disability such as visually, hearing, or verbally impaired, or learning difficulties. This may be confusing and could potentially be a barrier to engagement. Respondents to the research also

suggested that a database which remembers the details if the passenger has booked before would be helpful.

Consultation questions

Q3. What steps can be taken to increase website accessibility?

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Q6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

Possible areas for improvement – working with third-party agencies

1.24 The users of Assisted Travel are likely to access information about the service in different ways to other rail users. The Office of National Statistics internet access report[20] shows that across all age groups the proportion of adults who were recent internet users was lower for those who are disabled compared to those who

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[20]
https://www.ons.gov.uk/businessindustryandtrade/itandinternetindustry/bulletins/internetusers/2017#internet-use-by-disabled-adults

are not. 34% of disabled adults aged 75+ had used the internet in the last three months compared with 50% who are not disabled. There is therefore a need to use new and inventive ways to distribute printed information to older and disabled passengers who may not either have access to or use the internet.

1.25 As noted above, the DPPP requires that the passenger-facing booklet is actively promoted and copies are given to public sources of information. However, our research shows that no respondents become aware of Assisted Travel in this way. Using more local, non-rail sources to provide information could reach these passengers including those who may not currently be rail users. For example, this could take the form of making information such as leaflets, posters, etc. available in GP surgeries, shops, local support groups and pharmacies. Such an approach could present an opportunity to clarify and reassert the intent of Passenger Assist and eligibility for assistance.

1.26 Rail operators are expected to provide in their DPPP policy document a list of key organisations they consult with about accessibility issues, such as options for and prioritisation of access improvements. There is an opportunity to consider how both the scope of the agencies rail operators consult with and the range of issues they discuss can be expanded. For example,

proactively engaging and partnering with disability interest groups, charities, and recognised representative bodies to promote the availability of Assisted Travel schemes might be one way of increasing awareness.

Consultation questions

Q7. How can rail operators improve the availability and promotion of Assisted Travel information to third-party agencies?

Q8. How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?

2. Chapter 2 – User experience; improving the reliability of communications

Summary

2.1 In this chapter we highlight the experience of users of Assisted Travel and consider how communication can be improved to ensure that passengers receive all of the assistance they have requested. We seek views on these areas.

Introduction

2.2 Passenger Assist is a free service provided by rail operators to passengers who require assistance with their train journey. This service has to be booked in advance, giving no more than 24 hours' notice. A lower notice period for example three hours, is necessary for some of the recently awarded rail franchises where the winning bidder has offered a level of service over and above the minimised level. When booked in advance, assistance should be provided at all stations during the hours in which trains are scheduled to serve the station.

2.3 Rail operators should also provide assistance to passengers where this has not been arranged in advance, a 'Turn up and go' service, where this is reasonably practicable.

2.4 There is a range of services available to Assisted Travel users. These are set out in DPPP guidance[21] and rail operators' own passenger-facing booklets.

Research highlights

2.5 Our research highlighted the importance of Passenger Assist to users. Nearly two- thirds of users said that they could not have completed their journey without Passenger Assist.

Importance of Passenger Assist

I / My companion could have completed my journey without Passenger Assist, 1%

I / My companion could have completed my journey but it would have been more difficult, 35%

Don't know, 1%

I / My companion could not have completed this journey without Passenger Assist, 63%

D20. We are keen to know how helpful you found Passenger Assist in terms of making the train journey possible or simply more convenient. Which of the following best describes your experience? Base: All able to continue journey (3,586)

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[21] http://orr.gov.uk/__data/assets/pdf_file/0015/5604/how-to-write-your-dppp.pdf

2.6 Satisfaction with Passenger Assist was high, with 85% of users saying they were either very satisfied or satisfied. Overall satisfaction varied by disability type; there was a statistically significant difference in the level of satisfaction for passengers with a visual impairment (81%) or hidden disability (also 81%) versus the average (85%).

Overall satisfaction with Passenger Assist by disability type or condition

■ Very satisfied ■ Satisfied ■ Neither satisfied nor dissatisfied ■ Dissatisfied ■ Very dissatisfied ■ Don't know

Disability type	Very satisfied	Satisfied	Neither	Dissatisfied	Very dissatisfied	Don't know
Vision (688)	61%	20%	9%	4%	5%	
Hearing (512)	69%	18%	4%	4%	4%	
Physical (2479)	64%	20%	7%	4%	4%	
Learning or concentrating or remembering (308)	59%	23%	9%		5%	
Mental health problems (176)	59%	18%	10%	5%	7%	
Social or behavioural issues (66)	53%	23%	12%		8%	
Another long-term health condition (889)	65%	19%	7%		4%	
None of these conditions (480)	73%	15%	5%		4%	
I would prefer not to say (135)	65%	21%	4%	4%		
NET: Hidden condition (436)	60%	21%	9%	4%	6%	

E1. Overall, on a scale of 1 to 5, where 1 is vey dissatisfied and 5 is very satisfied, how satisfied are you with Passenger Assist? Base: All passengers (4,060)

2.7 Whilst satisfaction with the overall Passenger Assist booking process was high at 92%, passenger confidence that all of the requirements they have booked will be met falls to 72%. Their concerns were somewhat borne out as 19% said they did not receive <u>all</u>[22] the assistance of which 12% said they did not receive any.

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[22] When booking assistance, a record is created in the Passenger Assist database for each assist rather than for each journey, journey leg or each passenger. Each station a passenger is travelling through where they require assistance has a record created for each type of assistance they have booked. Return journeys are also treated as separate records. For example, a passenger travelling from London Euston to Birmingham New Street who wanted help with luggage plus assistance boarding and alighting the train would have a record created for each of the assistance types requested at each station (so there would be four records created for the outbound journey – two at London Euston and two at Birmingham New Street and a further four for any return journey – two at Birmingham New Street and two at London Euston). At least one additional field for each journey leg is created showing any disability type, e.g. visually impaired, learning disability, etc.

Was all the assistance booked received?

No assistance booked was received 12%

Some assistance booked was received 7%

All assistance booked was received 81%

D5. And did you actually receive the following assistance? Base: All passengers (4,060)
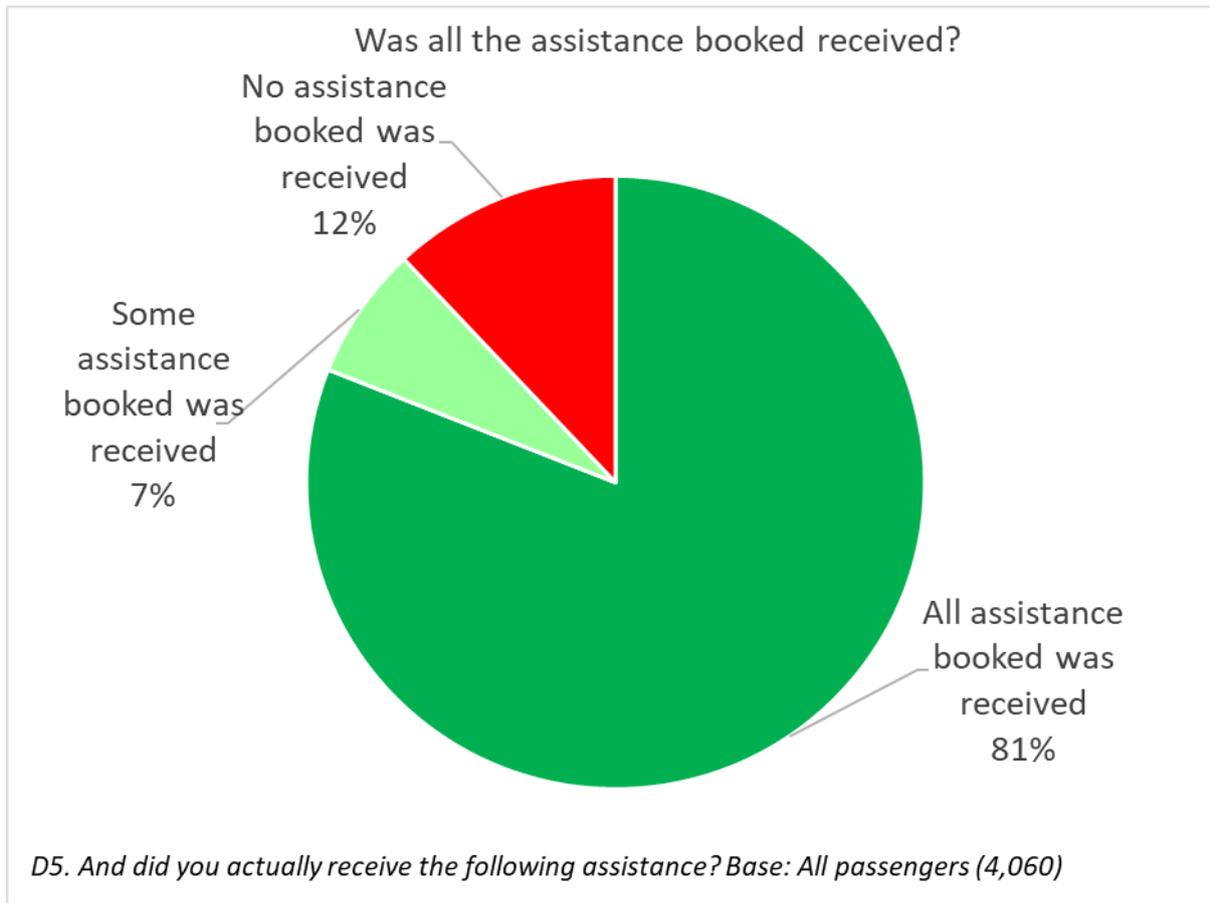
2.8 The chart below shows that, for Passenger Assist users, the reliability of the assistance seems to depend on the type of assistance that was requested.

Was the assistance booked received?

■ Yes ■ No ▪ Don't know / can't remember

Category	Yes	No	Don't know
Provision of a ramp (1,153)	89%	11%	
Getting to the wheelchair area...	88%	11%	
Getting to the platform (1,176)	87%	13%	
Getting to a seat (1,010)	87%	12%	
Boarding / alighting the train...	86%	14%	
Help with luggage (1,988)	86%	13%	
Assistance to and from connecting...	85%	14%	
Guidance if visually impaired (248)	85%	14%	
Booking the wheelchair area (431)	83%	14%	
Getting in / out of the station (770)	81%	18%	
A taxi (166)	81%	18%	
Planning the journey (168)	75%	18%	7%
Other (352)	76%	22%	

D5. And did you actually receive the following assistance? Base: All who booked that assistance type (shown in brackets)

2.9 The punctuality and reliability of staff was identified as one of the main reasons for passengers not receiving the assistance they had booked, or receiving it only after waiting an unacceptable length of time.

Was a member of staff available to meet you within an acceptable time frame?

No, I/my companion was not met by staff
9%

No, but I/my companion was eventually met by staff
7%

Don't know
2%

Yes
81%

D4. Was a member of staff available to meet you in an acceptable time frame? Base: All passengers (4,060)
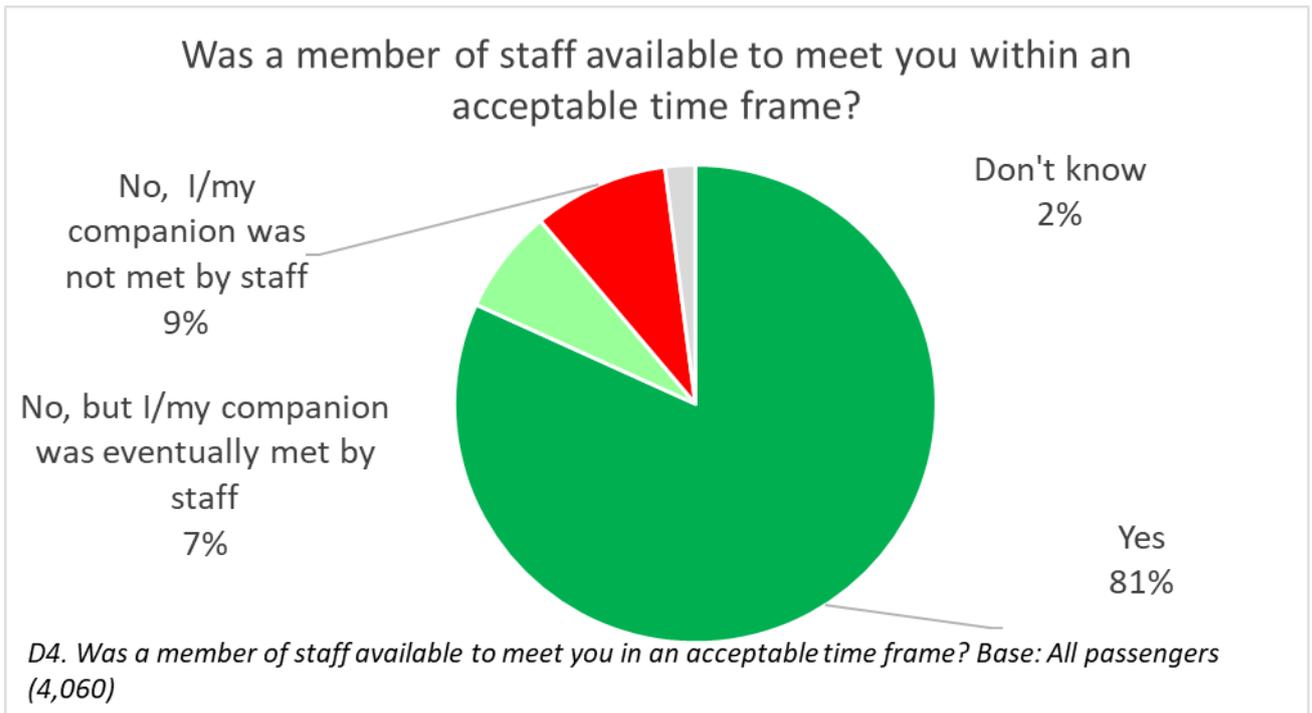
2.10 A key finding from the Turn-up and-go mystery shop was the difference in the reliability of the assistance depending on whether the mystery shopper had requested help to board (93% received it) or alight (78% received it) the train.

Turn-up-and-go mystery shop - difference in reliability of boarding and alighting assistance

Mystery Shoppers required boarding assistance for 196 journeys		Mystery Shoppers required alighting assistance for 161 journeys
⬇	**318 journeys in total**	⬇
Mystery Shoppers received boarding assistance for 183 journeys (93% of those asking for assistance)		Mystery Shoppers received alighting assistance for 125 journeys (78% of those asking for assistance)

2.11 This marked difference concerned us, so in an effort to understand how this might affect a passenger who was entirely dependent on assistance to both board and alight a train service we generated a 'journey completion' score. This revealed fewer than four in five (79%) of passengers would have completed their journey under these circumstances.

Turn-up-and-go mystery shop – assistance with boarding and alighting on same journey leg

149 asked for assistance both with boarding and alighting on same journey leg

117 (79%) asked for and <u>received</u> assistance with both

24 (16%) asked for boarding and alighting assistance but only received it when boarding

8 (5%) received neither assistance with boarding nor alighting

2.12 The research results highlight the importance users place on Assisted Travel and how highly they rate the service. However, it also shows that, broadly, one in five did not receive <u>all</u> aspects of the assistance they had asked for[23]. Much of the qualitative feedback from passengers on both forms of Assisted Travel said that they felt any problems they experienced with reliability related to the flow of information and the accountability of staff for delivery. We explore below how improvements in both areas might be targeted.

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[23] It is important to note that we applied strict criteria around what constituted an assistance 'completion'. We took the view that the assistance had failed if the passenger did not receive the assistance, or if the assistance was eventually provided but later than was deemed acceptable to the passenger.

A seamless end to end journey – improving communications

2.13 Confident use of the rail network for many users of Assisted Travel is predicated on the ability of rail operators to meet all of their needs; 19% of Assisted Travel users state that the rail operator is unable to do so. As noted later in this chapter, the number of people having an unhappy experience with a service makes it more likely that they will tell others and so spread a negative perspective, than someone who is content. Therefore, there is a clear incentive on rail operators to improve their services and encourage further use of the rail network.

2.14 Most of the explanations put forward by Passenger Assist users in the research for the failure of the assistance they had asked for cited frustrations with reliability. In particular, staff not meeting them as previously arranged, staff arriving late, and staff not being available to help them alight the train. 'Turn up and go' passengers reported not dissimilar issues; they were more successful in getting assistance in boarding the train than in receiving the assistance they had asked for in alighting it. In their case, it was often because staff at the destination station were not expecting them because either the destination station had not been informed by

the departure station or they had received the information but did not act upon it.

2.15 Performance across rail operators in providing all aspects of the assistance booked ranged from 87% down to 73%. This suggests that there are differences in how rail operators meet the needs of users of Assisted Travel. We are aware that a number of operators go over and above what is required of them within the DPPP guidance and employ practices which support more flexible and informed travel for those who need assistance. For example, the use of mobile applications for booking which passengers can also use to alert staff that they have arrived at a station. It is also likely that some performance failures may result from passengers not meeting staff at the time or place specified or how staff prioritise their activities, particularly at busy periods when multiple passengers may require assistance or other tasks may require their attention.

2.16 However, at a basic level, a better flow of information on booking details within and across rail operators would have a major impact on improving service delivery for Assisted Travel users. We are aware that RDG and its members are currently developing a new IT system, the Rail Availability Reservation Service (RARS), to improve the operation and capability of Passenger Assist. This new system will have the capacity to gather much more

detailed information about passengers, their booking details and assistance provision than the current system permits. This should allow rail staff to use a smartphone app to access real-time information on booking requests and to more accurately track and record assistance completions. However, we understand that RARS will not go live until autumn 2018 assuming that it is not delayed. Therefore, it is important that an interim solution is found to improve the reliability of assistance provision across the industry.

2.17 Improving the flow of information will improve staff accountability for the delivery of the service. Supporting staff through strengthened training will help them to do so. We explore in the following chapter how improvements in staff training might deliver better outcomes and service to Assisted Travel users.

Consultation questions

Q9. How might the reliability of communications be improved?

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

A seamless end to end journey – redress

2.18 As noted above, sometimes things go wrong and the research highlights the number of failures to provide all of the assistance the passenger has requested. Whilst the overwhelming majority of passengers completed their journey, a failure to provide assistance can be distressing, significantly undermine a disabled person's confidence and may deter that person from travelling in future. This might also have a wider impact; various studies have shown that an unhappy customer will tell around 10 people about their experience, three times as many as those a satisfied customer will tell.

2.19 The Consumer Rights Act 2015 (CRA)[24] provides an opportunity for passengers to seek redress. Where passengers are unable to obtain the service they have booked, they may be able to make a claim under the CRA. This provides that services must be provided with reasonable care and skill and in accordance with anything that is said or written to the consumer (by or on behalf of the trader), about the trader or the service, if it is taken into account by the consumer when deciding to enter into the contract, or making any decision about the service after entering into the contract. The CRA provides the consumer with remedies, which include the

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[24] http://www.legislation.gov.uk/ukpga/2015/15/contents/enacted

right to a price reduction, or a refund of money already paid, of up to the price of the service and it is also open to the consumer to seek damages.

2.20 The possible introduction of an Alternative Dispute Resolution (ADR) scheme in the sector that will consider complaints which the rail operator has been unable to resolve to the passenger's satisfaction will also provide a means of redress for these customers. Nonetheless, we are aware of at least one rail operator whose compensation policy includes the provision of a refund of the cost of the journey if the booked assistance is not provided.

Consultation questions

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Q12. Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?

3. Chapter 3 – Strengthening staff training

Summary

3.1 In this chapter we set out some options for strengthening training for company staff. We seek views on these and ask whether there are other improvements which could be considered.

Introduction

3.2 The DPPP guidance requires operators to commit that all staff will receive relevant disability awareness training or disability equality training, including senior and key managers, to ensure that they are made aware of their responsibilities to disabled passengers. Frontline staff who may, at any time, need to assist passengers will receive appropriate training in the use of equipment provided to assist people with disabilities, such as ramps, wheelchairs and induction loops.

3.3 In addition staff who may, at any time, deal directly with passengers will receive appropriate training to help them communicate with people with different disabilities. This encompasses staff who answer telephones to be trained in communicating clearly with people who may have difficulty speaking, hearing or understanding.

3.4 In 2008, DPTAC published a training framework[25] to help identify the needs of disabled people and the training staff require to assist them properly. The training focuses on good customer care for disabled people and is a free resource that has been designed for use across all modes of transport. The DPPP guidance currently refers operators to the training framework but does not mandate its use.

3.5 As part of our role of monitoring compliance with DPPPs, we collect and publish data from licence holders on the numbers of staff undertaking disability awareness training and the kinds of training provided. Our 2017 annual consumer report, Measuring Up[26], included positive examples of training initiatives undertaken by a number of operators e.g. piloting a practice-based approach to training that is intended to make staff more confident when interacting with passengers in real life situations. We have committed to review in depth the information provided by train companies on staff training and will consider how good training practices could be better recognised and disseminated.

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[25] http://www.davidhitchcock.co.uk/HResources/Framework.pdf

[26] http://orr.gov.uk/rail/publications/reports/annual-rail-consumer-report

Research highlights

3.6 The research highlighted that a majority of users of Assisted Travel were highly satisfied with rail staff, including 88% of Passenger Assist users who were met[27] by staff. The chart below shows how satisfied they were with each aspect of the staff member's performance.

Satisfaction with staff

- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied
- Don't know

How well your / your companion's particular needs were understood by the staff who assisted you / them at the station: 78% 14% 3%

The helpfulness and attitude of staff who provided assistance at the station: 81% 13% 3%

D17. Thinking about the journey assistance at <INSERT STATION>, how satisfied were you with...
Base: All passengers met by staff (3,586)

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[27] 9% reported they were not met by staff despite having booked the assistance, 3% of respondents 'didn't know'.

3.7 Just under four in five (78%) mystery shoppers said staff were 'positive and happy to assist' when they requested Turn-up-and-go assistance.

How staff responded to Turn-up-and-go assistance request

	Frequency (n)	Percent (%)
Positive, happy to assist	173	78
Some obstacles to overcome but felt achievable	31	14
Negative, unable to provide assistance to make journey on the day	9	4
Other	8	4
Total	**221**	-

3.8 However, the Passenger Assist research showed that those with hidden disabilities were less likely to receive the assistance they had booked compared to the average (81%). Confirmation that all assistance was received was highest for people with a physical disability (81%), followed by people with a vision or hearing impairment (79% for both), and lowest for people with a hidden condition (75 percent).

Overall satisfaction with assistance at the station by disability type

Legend:
- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied
- Don't know

Disability type	Very satisfied	Satisfied	Neither satisfied nor dissatisfied
Vision (610)	77%	14%	4%
Hearing (452)	81%	12%	3%
Physical (2201)	79%	13%	3%
Learning or…	77%	13%	3%
Mental health…	77%	12%	3%
Social or behavioural…	68%	15%	10%
Another long-term…	80%	13%	2%
None of these…	83%	12%	2%
I would prefer not to…	78%	17%	2%
NET: Hidden…	77%	12%	4%

D7. And how satisfied were you with the overall assistance Base: All with that disability and receiving assistance (shown in brackets)

3.9 When asked about areas for improvement, more than half of 'Turn up and go' mystery shoppers made reference to rail staff. Key areas for improvement they cited included staff attitude, staff training, more staff at stations, better communication between staff, and more staff awareness of 'Turn-up-and-go'.

3.10 The research results highlight the importance of ensuring that company staff are reliable, punctual and equipped with the necessary skills to identify those who may need assistance and to offer that assistance in the right way. We explore these issues further below.

On Track for 2020? The Future of Accessible Rail Travel report

3.11 A report[28] commissioned by the Association of Train Operators (now the Rail Delivery Group) in 2015 and published in July this year made a number of helpful findings and recommendations around staff training. In particular, it found significant differences between train operators in the quality and duration of training (initial and refresher). It found that there is a vital need for high quality training to be delivered consistently across the network. A number of the key findings and recommendations are shown below.

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[28] https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469772981

On Track for 2020? The Future of Accessible Rail Travel

Final Report (May 2015)

It is essential that consistent levels of training (both in terms of quality and frequency) are delivered across the network. It is of no help to disabled and older passengers to find well trained staff at one point of their journey and not at another. This is another example of the absolute necessity of a coherent and joined up approach across all the TOCs and Network Rail.

The type of training and its duration will depend critically on the role of the person being trained. For example, it is common to use e-learning programmes to give staff who are not in the front line of customer service a good feel for both legal requirements and best practice. E-learning has the benefit that it can be done with minimum loss of time away from other work.

For staff who work directly with the public including drivers, ticket office or other information staff and, of course, any whose specific role is assisting disabled people, the training must be much more detailed. For these staff, e-learning may be a useful way of refreshing or reminding them about key issues but it is not an acceptable or suitable medium for detailed learning.

For front line staff, training should include a significant element of learning about different disabilities and the right way to interact and communicate with disabled people. Engaging both disabled and older people to help with the delivery of training is important – provided that those involved are experienced trainers and able to provide a broad perspective on key issues and not just anecdotal evidence based on personal experience.

A clear emphasis on understanding the customer experience is also valuable. For example, spending a day travelling on the system with an older or disabled person can be a very enlightening experience.

Recommendations

Train all staff and customer–facing contractors and refresh training every two years in Disability Awareness/Equality and, where relevant, in delivery of assistance.

Work to develop a common and consistent approach to training comprising both initial and refresher modules based on a common core curriculum which all TOCs should follow.

Ensure that training also extends to managers and engineers (as required by PRM-TSI).

3.12 The RDG report recognises the important role that high quality staff training can play in ensuring that the needs of passengers requiring Assisted Travel are met. This includes providing a consistent high-level service not only within companies but across the industry. However, it is not clear at this stage how RDG plan to take forward the recommendations they have put forward.

Company training initiatives

3.13 We are aware that many individual companies make efforts to ensure that their staff are provided with the training they need. We summarised a number of these in the individual company reports in our annual consumer report, Measuring Up.

3.14 Examples of training initiatives of which we are aware include partnering with agencies such as RNIB or Dementia Friends to deliver training to their staff. These sessions often involve speakers from partner groups talking about their experiences and the assistance they require. Other rail operators engage professional trainers who have a disability to deliver training so that there is no unintended bias toward a particular disability. We also note the practice of some operators who provide in-depth training to a selection of staff who can then in turn support colleagues in the provision of assistance and promote the accessibility assistance available to passengers.

Hidden disabilities

3.15 As identified in the RDG report, there is a need to ensure that training should include a significant element of learning about different disabilities and the right way to interact and communicate with disabled people.

3.16 We know from our research that Assisted Travel users said that staff were often unable to spot passengers with hidden disabilities such as learning difficulties, cognitive impairments, etc. and reacted quizzically or skeptically to assistance requests. These sentiments especially came out in some of the qualitative feedback we received. Complaints about the attitude of staff was also a common theme with some users saying that staff made them feel that they were an inconvenience or had done something wrong by asking whether they had booked assistance or that staff intimated that they were annoyed that they had to help them. Addressing these issues will go a long way to meeting the needs of a group of passengers who reported relatively less satisfactory outcomes.

DPTAC Training framework

3.17 As noted above, DPTAC has produced a Framework for Disability Equality and Awareness Training for Transport Staff. The DPPP guidance document suggests

that rail operators may wish to refer to the Framework for guidance and good practice on staff training.

3.18 The Framework reflects the best practice in place when it was published in 2008. We note the DfT's recently published consultation on its Accessibility Action Plan which states that they will promote this framework to transport providers, and consider, with DPTAC, whether there is a need to update it.

Consultation questions

Q13. How can consistency in training for company staff across the industry on disabilities be achieved?

Q14. How frequently should disabilities training take place and its content be refreshed?

Q15. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

Q16. Is there a role for an independent benchmarking exercise of the quality of existing training? If so, who could do this e.g. ORR, DPTAC etc.?

4. Chapter 4 – Strengthening monitoring

Summary

4.1 In this chapter we set out how we are strengthening our monitoring of Assisted Travel and seek views on how this may be improved further.

Introduction

4.2 Compliance monitoring plays an important role in holding licensees to account for the services they provide to passengers. As noted earlier in this document, we use our monitoring data to develop a clear evidence base on accessibility, taking forward our findings with stakeholders, identifying areas for improvement and addressing weaknesses. This data also provides a strong evidence base on which to consider taking enforcement action where we deem it proportionate to do so.

4.3 Effective monitoring has been a key area of activity for ORR in recent years where we have implemented a 'Core Data' compliance monitoring framework that requires our licensees to routinely report to us on key areas of performance that affect passenger outcomes. The strength of our core data monitoring is that it relies on a blend of data reported by the companies themselves and our own independent primary research. All the core data we collect is published on the ORR

Data Portal[29] and in our annual consumer report, Measuring Up[30].

4.4 Core data has been especially effective in strengthening our ability to monitor that train operators and Network Rail are meeting the commitments they have made to passengers in their DPPPs. To that end, our core data monitoring of DPPPs has until now primarily focused on the following areas:

- **Staff training –** licensees are required to provide us with an annual report setting out the number of staff who have received disability and equality related training in the past year and some explanation of the nature of the training undertaken.

- **Volumes of assisted travel** – ORR currently receives data from RDG (who manages the Passenger Assist system on behalf of its members) on the number of assistance bookings each licensee receives in a Rail Period[31]. Recently ORR has also begun to receive data directly from train operators and Network Rail on the number of booked and

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[29] ORR Data Portal https://dataportal.orr.gov.uk/

[30] 'Measuring Up' 2017 ORR Annual Rail Consumer Report: http://orr.gov.uk/__data/assets/pdf_file/0007/25297/measuring-up-annual-rail-consumer-report-july-2017.pdf

[31] A 'rail period' is normally 28 days, or four weeks, for business reporting purposes (Sunday to Saturday) and there are 13 rail periods in a financial year.

unbooked assists they have actually delivered at their stations within each Rail Period.

- **Quality of assisted travel** – a small number of licensees currently have a franchise obligation to assess the quality of assistance they are providing to passengers. The weakness of this arrangement is that it is only done by a minority of companies and they each tend to measure passenger satisfaction in different ways which makes it hard to compare performance. We have until now partly mitigated this problem by conducting our own primary research and using secondary research commissioned by other organisations to generate the necessary insight.

- **Accessibility-related complaints** – licensees currently report to us on the volume of accessibility-related complaints they receive in a Rail Period. These complaints are also logged against ten different categories of accessibility complaint for example station signage, station facilities, problems booking assistance, quality of assistance, etc. which provides us with more granular detail on what particular aspects of accessibility are generating complaints.

- **Alternative Accessible Transport (AAT)** – we also receive data on the volume of AAT a licensee provides to passengers in a Rail Period. AAT, which is usually in the form of an accessible taxi, is provided as an alternative mode of transport for the passenger in a situation where the station they intended to travel to or from was inaccessible to them[32].

Enhanced monitoring – Accessibility core data

4.5 It is our view that the research findings coupled with our analysis of our existing accessibility Core Data present a case for enhanced monitoring in this area going forward. We consider this should, as a minimum, include:

- **Broadening and strengthening our core data accessibility complaints categories.**

  A review of our current ten different categories of accessibility complaint indicates that we currently do not capture data on some of the topics that play a key role in driving user satisfaction and dissatisfaction, such as: assistance staff punctuality, staff helpfulness and attitude, staff knowledge / ability

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[32] For example, in a scenario where the passenger is a wheelchair user and the station they want to travel to or from has no step-free access to the platform and the station lift is out of order, then AAT could be provided to take the passenger to the next accessible station to allow them to continue their journey.

to use any equipment, etc. We therefore propose to expand the number of accessibility complaint categories to enable us to monitor passenger dissatisfaction expressed via complaints more broadly. This should give us a means to identify issues with greater precision and pursue more targeted remedial action.

- **Strengthening licensees' reporting requirements on staff training**.

  In Chapter 3, we seek views on how staff training could be strengthened. It is therefore likely that licensees' current reporting obligations in this area will change following this period of consultation. Whatever form the new monitoring requirement takes, it would be logical to monitor its implementation via our existing core data framework.

- **Working with licensees to improve the quality of Assisted Travel provision data.**

  Since Rail Period 5 (2017/18), as part of our core data monitoring, we have been receiving both booked and unbooked Assisted Travel provision data from those licensees who operate stations. The quality of the data we have received thus far, in terms

of its accuracy and completeness, has varied significantly between companies due to the challenges associated with gathering this data across all of their stations[33].

Over the next few months we will take steps to improve the quality, consistency and comparability of this data in two ways. Firstly, we will strengthen our data collection guidance documents to help ensure each licensee records Assisted Travel provision data in a consistent way to enable better performance benchmarking. Secondly, we will hold an industry workshop with licensees in January 2018 to encourage them to share knowledge on best practice about data collection methods. The intention is that by the commencement of the new regulatory reporting year 1 April 2018 – 31 March 2019 our dataset will be sufficiently robust to allow us to begin publishing this data.

Enhanced monitoring – continuing the Passenger Assist user experience survey

4.6 The Passenger Assist user research has been very effective at generating a reliable baseline for assessing

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[33] For some licensees this has been especially challenging because it has involved re-training/instructing staff across hundreds of stations on the new data collection requirements and then putting in new processes to centralise and report on the data. This has meant that when licensees have been submitting the data to ORR they have alerted us to some concerns about the data's quality.

how performance on booked assistance varies across the industry. Given the current weaknesses in the Assisted Travel provision data we are receiving from some licensees via their core data reporting, we feel it is essential that we maintain our ability to monitor all licence holders' performance independently. For this reason, we intend to continue with our Passenger Assist performance tracking survey, using the same methodology that generated our baseline, for at least the next 13 Rail Periods (a calendar year) and possibly beyond that until we feel it is no longer required. This will allow us to continually monitor the quality and reliability of booked assistance provided across the industry and, at the same time, equip us with a firm evidence base upon which to challenge and take action on poor performance where it occurs.

Rail Availability Reservation Service (RARS)

4.7 Longer-term it is our expectation that the monitoring of Assisted Travel will become even more accurate, robust and largely automated as technology develops and creates new possibilities. For this reason, we welcome the work RDG and its members are currently doing to develop RARS, which we note in chapter two. These changes could make a material difference in addressing some of the issues we noted in previous chapters

around the reliability of assistance and the accountability of staff who deliver it.

4.8 Beyond this, RARS could also begin to address some of the wider customer service issues about which Passenger Assist users have expressed frustrations. For example, if staff have access to real-time booking data it could allow the minimum notice required to book assistance (currently up to 24 hours) to be reduced significantly. Since the passenger interface will also be more streamlined, it should also allow passengers to book assistance at the same time as buying their tickets and avoid the current two-stage process of buying a ticket and then separately booking assistance.

4.9 RDG has suggested that RARS could also potentially help provide some long-term, enduring solutions to licensees' Assisted Travel compliance reporting by giving ORR some direct, 'read only' access to the system. In theory, this could allow us to monitor Assisted Travel services more closely and in more depth than is currently possible. Until RARS is delivered, however, our proposed continuous tracking survey represents the best means by which to hold individual licensees to account for the quality of assistance they are providing. We therefore encourage RDG and its members to ensure they meet their timetable of implementing RARS before

the end of 2018 to deliver these benefits to passengers as quickly as possible.

Consultation questions

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

5. Chapter 5 – Reviewing DPPPs

Summary

5.1 In this chapter we set out our approach to reviewing the DPPP guidance and future reviews of train company DPPPs.

Introduction

5.2 As noted previously, train and station operators are required by their operating licences to establish and comply with a DPPP which must be approved by ORR. Amongst other things, a DPPP sets out the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use.

5.3 ORR reviews and approves DPPPs based on 2009 DfT published guidance '*How to Write Your Disabled People's Protection Policy: A Guide for Train and Station Operators*' (the guidance)[34.] DPPPs are reviewed and approved annually by ORR.

5.4 The DPPP of each licence holder has now been reviewed and meets the minimum standards as set out in the 2009 guidance. This review took place most recently in 2016.

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[34] http://orr.gov.uk/__data/assets/pdf_file/0015/5604/how-to-write-your-dppp.pdf

5.5 In our Regulatory Statement of July 2014, '*Disabled people's protection policies – a regulatory statement*'[35], we set out our intention to look again at the current practice of operators submitting their DPPPs to us for review and re-approval each year where no material changes have been made.

Approach to reviewing the DPPP guidance

5.6 Following consultation in December 2011, the Department for Transport agreed that ORR should take on the role of approving DPPPs, thus bringing the approval and enforcement functions into one place. In autumn 2013, licences and statements of national regulatory provisions were modified to formalise this change in responsibility.

5.7 As noted above, we have continued to review and approve DPPPs against the standards set out in the guidance in place when responsibility for this function was transferred to ORR. The DfT guidance therefore remains unchanged since 2009.

5.8 There have been a number of changes that are not reflected in the 2009 guidance for example the Equality Act 2010. The language and terminology used in some places in the document is also out of date and in need of

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[35] http://orr.gov.uk/__data/assets/pdf_file/0010/13996/dppp-regulatory-statement.pdf

revision, and wider developments such as the use of social media is not covered.

5.9 The DfT guidance sets minimum standards that train operators have to meet, and which we would expect they will seek to exceed; these standards remain relevant. As noted in the guidance, we are conscious of the benefits of stability in the requirements and will only propose substantive changes where there appears to be a good case for them. We will update the guidance to:

- ensure that it refers to current legislation and best enables operators to comply with their equality duties[36];

- update on any areas where technology has changed for example the use of social media or apps;

- restructure the document to more clearly set out the minimum requirements that all DPPPs must comply with;

- reflect changes arising from responses to the issues raised in the earlier chapters of this consultation document; and

- highlight good practices carried out by operators that go over and above the requirements of these minimum standards.

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[36] Compliance with relevant equality legislation remains the rail operators responsibility.

Consultation question

Q20.Do you agree with our proposed approach to updating the guidance?

Next steps

5.10We propose to update the DPPP guidance in the coming months. We will consult with stakeholders on these changes which we will incorporate into guidance. All licence holders will then be required to carry out a one-off review of their DPPP to ensure compliance. **When publishing the updated guidance we will set out a timescale for submission of revised DPPPs for ORR review and approval.**

Approach to annual reviews of DPPP

5.11Our Regulatory Statement of July 2014, noted above, made it clear that we would revise our approach to the annual review of DPPPs. In particular, once we were satisfied that all DPPPs expressed the minimum level of obligations clearly and the policy documents fully describe internal arrangements, we would end the practice of operators submitting their DPPPs to us for review and re-approval each year where no material changes have been made.

Post 2016 DPPP review

5.12 Since our review of all DPPPs in 2016 we have received a number of DPPPs for annual review. Our experience has been that the changes made to these policies relate to aspects such as changing dates and information on improvements, re-wording sections or improving the clarity of certain paragraphs, and updating layouts and images. These changes are not typically material. We are of the view that it is not proportionate to ask licensees to submit their policies to ORR for annual review and approval where routine changes only have been made. It is also not an appropriately targeted use of ORR's resource to conduct a full annual review of DPPPs when the changes are not material.

5.13 All DPPPs were reviewed and approved in 2016 as meeting the standards required in the guidance. Therefore, in accordance with our Regulatory Statement, it is our intention to end the practice of annual reviews of DPPPs. In future, licence holders will be required to submit their DPPP for approval only where they have made a material change. Nevertheless, they will be required to conduct an annual review of their own DPPP and to submit confirmation to ORR both of its completion and that there has been no material change. We will also require licence holders to submit their DPPP for review where evidence emerges that they are not being

implemented appropriately or where we consider a material change has been made. We explore these issues further below. **This new process for annual review will commence after all DPPPs have been reviewed and approved as set out in paragraph 5.10 above.**

5.14 The changes we are making will not affect initial approval of DPPPs for newly licensed operators or those with new franchise awards. In this case, the approval process takes approximately three months to complete and includes a four-week consultation with DPTAC, Transport Focus and/or London TravelWatch.

Material changes

5.15 Where licence holders propose to make material changes to their DPPP it must be submitted to us for approval before being implemented.

5.16 Changes would be classed as material where they constitute a substantive change to the policy itself and would impact on the assistance provided to passengers. We would not expect licence holders to suggest any changes to their policies which are not compliant with the requirements of the guidance. Licence holders must provide a description of and the reasons for the proposed changes along with an explanation of the

impact they expect these changes to have on passengers.

5.17 Material changes might be made in areas where the guidance gives flexibility for licence holders to adopt their own policies. For instance, we would consider a change to a licence holder's policy on the carriage of scooters, which directly impacts on the assistance received by passengers, to be a material change; we would expect licence holders to provide a description of, and the reasons for, the proposed changes along with an explanation of the impact these changes are expected to have on passengers. Updates to information such as dates, rolling stock information or stations information would not be considered as a material change for the purpose of these reviews.

5.18 The above does not constitute an exhaustive definition of material change and we would encourage licence holders to check with us where they are anticipating making a change that they consider may be material.

Licensee reviews of DPPP - confirmation

5.19 Under the revised process, we expect licence holders to continue to review their DPPP on a regular basis, and at least annually, in line with the requirements of section B4.2 of the guidance. As part of this review, we would expect operators to continue to introduce new and

innovative practices to ensure continuous improvement of the assistance provided for disabled passengers travelling by rail.

5.20 Licenced operators must inform ORR when the review has been completed, providing confirmation that there has been no material change. We continue to expect operators to ensure that their DPPP document is available on their websites and at stations, and publicised in line with the requirements of the guidance. This includes the period during which their DPPP is under review until the new DPPP is made available, this ensures that a DPPP is always available at staffed stations and on websites.

5.21 We reserve the right to review DPPPs periodically in order to ensure compliance with the obligation to inform us of any material change and to refuse approval where necessary. We will inform licensees if their DPPP is selected for review.

Evidence based reviews

5.22 Removing the requirement for ORR to review and re-approve DPPPs annually will allow us to focus resource on monitoring operators' compliance with their approved policies to ensure they are providing the required benefits for passengers in practice.

5.23 We will continue to monitor licence holders' implementation of their policies by way of core data, now submitted to us on a regular basis, bespoke research and other insight. This information provides us with a solid evidence base on which to help us to determine whether performance is falling short of expectations and requirements. As noted in this document, we intend to further strengthen our monitoring. We will engage with those licence holders whose delivery and performance in this area falls short of their obligations and will work with them as they move back to compliance, using our enforcement tools as necessary.

5.24 Where necessary we will use our powers through Condition 5 of the licence to require operators to undertake a review of their policies or the way in which they have been implemented at any time. This would include instances where data shows that operators are not performing as expected or where an issue has been identified with how the policy is being implemented in practice. In such a case, operators will be required to carry out a review of their DPPP and report the outcomes to ORR, and make changes to their DPPP as required by ORR.

Consultation question

Q21.Do you agree with our proposed approach to reviewing DPPPs?

Next steps

5.25All licence holders will be required to submit their DPPP for review at the appropriate time in accordance with paragraph 5.10. **It is not necessary for licence holders to seek approval for their annual review in advance of that date unless there has been a material change to their DPPP.**

Summary of consultation questions

Chapter one - Raising passenger awareness

Q1. How can rail operators' improve the availability and promotion of Assisted Travel information in stations?

Q2. Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

Q3. What steps can be taken to increase website accessibility?

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

Q5. Are there any obstacles to providing Assisted Travel information no more than 'one-click' from rail operators' website home pages?

Q6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

Q7. How can rail operators' improve the availability and promotion of Assisted Travel information to third-party agencies?

Q8. How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Q12. Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?

Chapter three – Strengthening staff training

Q13.How can consistency in training for company staff across the industry on disabilities be achieved?

Q14.How frequently should disabilities training take place and its content be refreshed?

Q15.Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

Q16.Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/Another? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

Chapter four – Strengthening monitoring

Q17.We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

Q18.Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Q19.Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term?

Chapter five – Reviewing DPPPs

Q20.Do you agree with our proposed approach to updating the guidance?

Q21.Do you agree with our proposed approach to reviewing DPPPs?