OFFICE OF RAIL AND ROAD

Annette Egginton Head of Competition and Consumer Policy Directorate of Railway Markets & Economics

Email: <u>annette.egginton@orr.gsi.gov.uk</u>

28 November 2016

Phil Wittingham Managing Director Virgin Trains

Dear Phil

Review of West Coast Trains Limited (Trading as Virgin Trains) Disabled People's Protection Policy (Condition 5 of your Station Licence and GB Statement of National Regulatory Provisions: Passenger)

Thank you for providing updated versions of your Disabled People's Protection Policy (DPPP) documents for review. A copy of your revised DPPP is attached to this letter, and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your DPPP against the 2009 Guidance "*How to write your Disabled People's Protection Policy: A guide for Train and Station Operators*" (the Guidance) and can confirm that your revised DPPP meets the requirements of Condition 5 of your station licence and GB Passenger Statement of National Regulatory Conditions (SNRP).

We welcome the following commitment, which we believe will have a positive impact for passengers:

• Your cross-functional Journey Care Group which meets regularly to review feedback from frontline teams, customer research and customer correspondence.

Since your DPPP was originally submitted to ORR we have had several exchanges in the intervening period in order to bring about the changes required to make it fully compliant with the Guidance. We also sought views on your policies from Transport Focus, London TravelWatch and the Disabled Persons Transport Advisory Committee (DPTAC).

The main areas where you clarified your policies during our review were:

- **Passenger assistance:** The guidance states that operators are not expected to require passengers to give more than 24 hours' notice for booking assistance. You have now clarified that passengers are not required to give more than 24 hours' notice for assistance bookings.
- Booking assistance for travel on 27 December: Your assisted travel booking service is closed 25 and 26 December, meaning that passengers wishing to book assistance for travel on 27 December must give more than 24 hours' notice. This



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does not meet the requirements of the guidance. You have therefore amended your document to advise passengers to contact the National Rail Enquiries booking line on these dates. They will transfer calls to an open call centre in order that passengers are able to make arrangements.

- Online booking: The guidance states that operators are expected to provide passengers with an electronic means to book assistance. You have now created an online booking form allowing passengers to book assistance through your website and added details of this to your document. We note that you state customers may prefer to call rather than using the online facility because you might need to contact them in order to finalise the booking, for example if a wheelchair space is not available on the chosen train. We understand what you are seeking to achieve, however, we may consider revisiting this aspect of your DPPP if we receive information that indicates that this discretion is being exercised in a way that is undermining the objective of the commitment.
- Provide assistance when booked in advance: The guidance states that operators are expected to provide assistance, when booked in advance, at any station during the hours that trains are scheduled to serve that station. The assistance that TOCs provide will be dependent upon the needs of the passenger, and may include alternatives to providing staff (such as accessible taxis), if this is acceptable to the passenger but TOCs should be mindful of allowing passengers to make as much of their journey by rail as possible. You have clarified that in the case that your trains call at a station managed by another operator, and this station is unstaffed when a passenger requiring assistance wishes to use it, you will discuss with the passenger what help they require and make the appropriate arrangements. We note that it is the responsibility of Virgin Trains to ensure that the assistance requested by your passengers is provided.
- **Luggage:** The guidance states that operators must ensure that luggage assistance is provided when booked in advance. You have clarified that assistance with luggage will be provided where it has been booked in advance. You have asked passengers to be mindful of the luggage allowance set out in the National Rail Conditions of Travel and ensure the weight does not exceed 23kg.
- Alternative formats: The guidance states that operators must commit to providing copies of all documents comprising their DPPP, including those in alternative formats, to passengers on request within seven working days. You have now provided this commitment in your document.
- **Contacting passengers during disruption:** The guidance states that operators must commit to contacting passengers who have booked assistance during disruption to inform them and, if necessary, make alternative arrangements (such as re-booking assistance). You have strengthened your commitment in this area. However, we draw attention to the requirements of the guidance in this area and we may consider revisiting this aspect of your DPPP if we receive information that indicates the objective of this requirement is being undermined.



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In addition to this, please note that we expect all supporting information, such as that provided on your website and printed documents, to be consistent with the information provided in your DPPP.

Yours sincerely,

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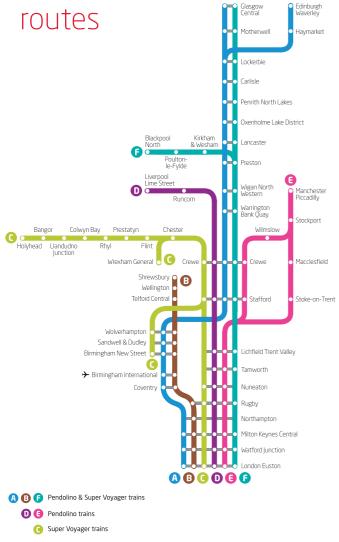
Annette Egginton



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Virgin Trains West Coast routes

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Making rail accessible

Helping older and disabled passengers

alid from November 2016



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1. Policy summary

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West Coast Trains Limited, trading as Virgin Trains, is a wholly owned subsidiary of Virgin Rail Group Limited.

This document gives details of our services and facilities, how we provide them and the standards of service that can be expected, as well as how we help if services are disrupted.

It forms part of our overall Disabled People's Protection Policy that helps us meet the needs of customers who are disabled or whose mobility is impaired. Our trains are for everyone and we'll do everything we can to make each journey relaxing and enjoyable.

Our routes link London Euston with the West Midlands, North Wales, Manchester, Liverpool, and Glasgow, and the West Midlands with the North West, Glasgow and Edinburgh. These provide for a range of long-distance journeys by direct, through-trains, which are a significant benefit to people with disabilities.

We manage 17 stations:

Carlisle, Penrith North Lakes, Oxenholme Lake District, Lancaster, Preston, Wigan North Western, Warrington Bank Quay, Runcorn, Crewe, Stockport, Macclesfield, Stoke-on-Trent, Stafford, Wolverhampton, Birmingham International, Coventry and Rugby.

The rest of the stations on our routes are managed by other Train Operating Companies and Network Rail and are shown on our route map at the end of this document.

We have ticket offices and customer service teams at London Euston, Birmingham New Street, Manchester Piccadilly and Glasgow Central as well as customer service teams at Milton Keynes Central and Liverpool Lime Street to help you and answer any questions.

We use Voyager and Pendolino trains, which first entered service during 2001-2004, and they comply with laid down accessibility standards. If you'd like to know more about these please have a look in section 7.4.

2. Assistance for customers

2.1 Booking assistance

a) For information about our services, including any changes due to engineering work, and the services available at the stations at which they stop, please call our JourneyCare service on 08000 158 123 (08000 158 124 textphone) between 0800 and 2200 daily, except Christmas Day and Boxing Day. If you'd like to make an assistance booking on Boxing Day just give National Rail Enquiries a call on 03457 48 49 50 and you'll be directed to available call centres.

b) JourneyCare also offers travel information and advice about the most convenient and accessible stations for you to use, lets you buy a ticket for your whole journey, and can arrange help through the national Passenger Assist computer system. This includes reserving appropriate seats and wheelchair spaces onboard, as well as help with getting on and off trains.

c) If possible, please book assistance 24 hours before your journey, or further ahead if you can, and let us know any specific requirements you may have.

d) You can request assistance at

virgintrains.co.uk/experience/assisted-travel. In this case, we may need to contact you before finalising the booking if there are any difficulties in fulfilling your request such as a wheelchair space not being available on your chosen train. For this reason you may prefer to call us instead of using the online facility so we can discuss your individual requirements, along with ticket booking, with you directly at the outset.

e) As well as our 17 managed stations we call at 32 others and levels of accessibility and assistance available can vary a lot from one to another. With this in mind we and others in the rail industry give information to Knowledgebase, a national database which has details of accessibility at stations and helpline numbers for you to use. This database is available through National Rail Enquiries, JourneyCare, virgintrains.com, rail travel telesales centres, travel assistance contact points, and at stations.

f) Knowledgebase is constantly refreshed so that information on the Station Journey Planner is up-to-date, and you can be made aware of any limitations or temporary restrictions. This covers:

i. Stations which have a physical constraint that prevents some disabled people from using it.
ii. Significant temporary work being carried out that affects station accessibility.
iii. Changes to stations that would make them temporarily inaccessible (e.g. when facilities such as lifts and toilets at stations are out of order).

iv. Facilities on trains for disabled customers that are unavailable, as far as this is reasonably practicable.

g) All our onboard staff will look out for customers with specific needs and offer help if necessary, including getting off the train, whether you've booked assistance or not.

h) If your hearing, vision or mobility is impaired, please tell the Train Manager as soon as you can - for example when tickets are checked. If you need assistance to use the train's facilities, or if particular help would be needed in an emergency, please tell us this when you call our JourneyCare call centre before you travel.

i) Our trains serve both staffed and unstaffed stations and levels of accessibility can vary a lot. When you call our JourneyCare team they will advise on the facilities available at the stations we serve, help you plan your journey, explain how we can help you and also book assistance or make arrangements so that you can complete your journey.

j) If you've booked assistance at a station we manage, we will provide assistance off the train when the train arrives. At terminal stations we aim to help you within 5 minutes of the train's arrival.

2.2 Assistance which has not been booked

If you have a disability, improved accessibility at our stations and on trains may mean that you do not require any staff assistance to travel. However, if you do require assistance, (e.g. on and off the train and/or around the station) you can just turn up and we will always do our very best to help you just as soon as staff and equipment are available. If you would like the reassurance of prebooking your assistance and knowing that staff are expecting you, then we recommend booking assistance 24 hours in advance (you can also book further in advance if you wish).

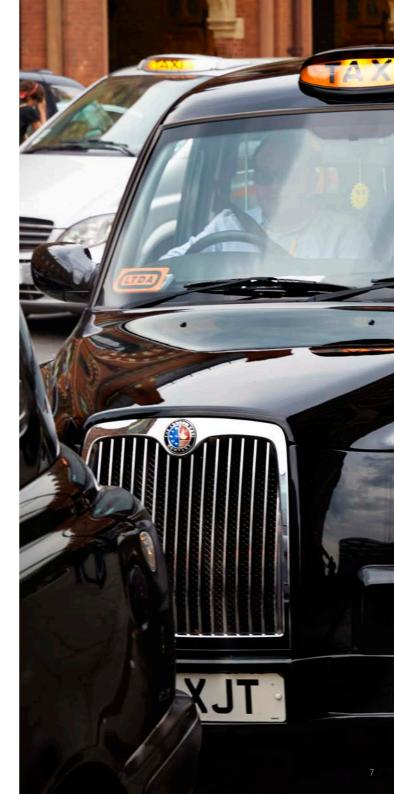
For the few stations which we serve but which are unstaffed, welcome posters will be displayed at the station containing the telephone number for the relevant Assisted Travel team. This team can arrange alternative transport to the nearest accessible station or advise on alternative options if you are able to get to the platform.

3. Alternative accessible transport

If you can't travel from one of our stations because it's inaccessible to you (e.g. because of a physical constraint), we'll provide an appropriate alternative accessible service to take you to the nearest or most convenient accessible station from where you can continue your journey. Our JourneyCare call centre will be happy to discuss these arrangements to meet your specific needs.

Very occasionally our trains are replaced by buses and if this is the case for you, we'll do everything we can to make sure accessible vehicles are available to keep you on the move. We can't always guarantee this so if we can't alternative arrangements will be made (eg arranging a suitable taxi) at no extra cost to you.

If getting in to or around one of our stations is affected by temporary lack of a facility, like a lift, we'll organise ways to take you to an alternative accessible entrance, such as an accessible taxi, or to the nearest appropriate accessible station, at no extra charge.



4. Passenger information

All of our ticket sales staff have information about station accessibility, meeting customers who have pre-arranged assistance, and details of the availability of facilities such as hearing loops and help points. We constantly review this information with staff at our stations to ensure the best possible pre-travel advice is available to you. You can also find all this information on the National Rail website at nationalrail.co.uk/stations

Our database is updated by our Retail Support Managers to reflect any changes to accessibility, temporary or otherwise, at our 17 managed stations within 24 hours of notification.

Details of the normal accessibility of our 17 stations can be found in the appendix. A list of the different types of trains and routes we use is available in section 7.4.

This information is updated as part of the annual review of this DPPP.

5. Tickets and fares

You can use a Disabled Persons Railcard to get more affordable travel on our trains. This Railcard gives discounts to the holder and an accompanying adult on a wide range of our tickets.

Disabled customers who, due to their disability, haven't been able to buy a ticket before boarding the train, are entitled to buy one during the journey with any relevant reduction, including by a Railcard, without any restriction.

If you don't have a Railcard and are blind or partially sighted and travelling with a companion, or if you use a wheelchair, you can get a discount on Anytime tickets, which may be a cheaper option than other ticket types available for the journey. These discounts range from 34% to 50% off the price. Full details can be found through nationalrail.co.uk.



6. At the station

6.1 Station entrances

We will not permanently close any entrance at our stations if this leads to a reduction in accessibility for disabled customers to any platform or facility, without having first consulted Transport Focus, London TravelWatch (as applicable) and disability groups, and without having obtained the consent of the Department for Transport.

We'll also take into account the needs of disabled people when restricting or temporarily closing access points at stations, for example during building works.

6.2 Aural and visual information

We'll provide clear and consistent aural and visual information of train departures and other relevant messages through our customer information screens and public address systems available at all our stations, particularly in the event of delays or disruption.

6.3 Information points and displays

At our larger stations, staffed information points are available for providing assistance.

We generally use these information points, or booking offices at smaller stations, for people who have booked assistance to meet our station staff. We tell customers when they book that these places are where they should go when they get to the station. These are detailed within the Appendix.

At our smaller stations our booking offices can provide information for you.

All information on the facilities, services and accessibility of all of our stations will be available to you at information points, station ticket offices, by phone and online.

Information on timetables, fares, connections and confirmation of any help arrangements that have been

made through Passenger Assist will be available at information points.

Timetables, posters, information leaflets and other materials are placed so that both wheelchair users and standing customers can obtain or have access to them.

Staff at our information points will give you the most up-to-date information, including information on the services and facilities provided by other operators, as well as the accessibility of other transport available near the station.

All information about train services on display at stations is also available through our staffed information points.

At stations we provide real-time information about delays, diversions and any other events that may affect your journey as soon as we can.

6.4 Ticket machines

Our self service ticket machines issue tickets for use with the Disabled Persons Railcard, and are accessible to wheelchair users.

6.5 Ticket gates

All stations we manage which have automatic ticket gates, and any associated manual gates, will be kept open if there are no staff available to supervise them.

6.6 Luggage

We can provide assistance with luggage at our stations and when boarding and alighting trains. To book this assistance, please contact our JourneyCare team (see section 2 for contact details). This service is free of charge.

You can take up to three items of luggage onto the train unless there is not enough room for it, your luggage would obstruct doorways, gangways or corridors, or the loading or unloading of your luggage would cause delay to trains. Your luggage should not exceed 23kg in weight.

6.7 Left luggage

We do not operate any left luggage facilities at any of our stations.

Fully accessible facilities are available at some of the larger Network Rail stations we serve such as London Euston, Birmingham New Street, Manchester Piccadilly and Glasgow Central.

6.8 Ramps

Ramps are available at all of the stations we manage to help you and your luggage get on and off our trains, as well as other staffed stations we serve. At unstaffed stations our Train Managers will be pleased to help you between the train and platform using the onboard ramps, as long as arrangements are in place for you to get out of the station. If you do require use of these ramps or assistance at any station, we recommend that you contact our JourneyCare team (see section 2 for contact details).

6.9 Facilities provided by third parties

We do everything we can to make sure that services and facilities provided by third parties at our stations are as accessible as possible, and will highlight to them any deficiencies that have been brought to our attention. We also make accessibility considerations a requirement of their contracts with us.



7. On the train

7.1 Aural and visual information

All of our trains have public address equipment and a visual display in each coach showing the train's destination, and the next stop. Train Managers make clear announcements when delays occur, and before each station stop in plenty of time to enable you to be ready to get off the train comfortably. If you may have difficulty hearing such announcements please advise the Train Manager at the earliest opportunity.

7.2 Seats on trains

Seat reservations are strongly recommended for all journeys on our trains. They're free to make if you have a ticket for the journey. We aim to make seat reservations available around 12 weeks in advance of travel until two hours before the train starts its journey (or the previous evening in the case of trains leaving their starting station early in the morning).

We strongly recommend that wheelchair accommodation, priority seating and assistance onboard our trains or at stations is also booked in advance, as described in section 2.1. Arrangements can normally be made from up to 12 weeks before the date of travel.

All our trains have a wheelchair space and table in Standard Class and also in First Class. All of this accommodation can be reserved through Passenger Assist. Our trains are accessible by wheelchairs with a maximum width of 70 centimetres, and a maximum length of 120cm.

If you'd like to reserve a Standard wheelchair space, and if all Standard spaces have already been booked, we'll upgrade you to the First Class space on the train, if it is available, for free. This upgrade is also available for one travelling companion.

The places on the train where wheelchair spaces can be found are clearly indicated on the outside of the train by the International wheelchair sign by the appropriate door. All our trains have a number of 'priority' seats available for customers who require additional leg room, which may include those with an assistance dog. You can reserve these seats through Passenger Assist but generally they are only available when all other reservable seats are booked.

7.3 Mobility scooters

Unfortunately we can't accommodate many of the larger, outdoor runabout powered scooters, due to problems with their weight, dimensions and manoeuvrability. If your scooter doesn't exceed 70cm wide x 120cm long and can be manoeuvred into the wheelchair space (this is generally achievable for those with a triangular footprint) we should be able to help. Alternatively we can accommodate it, if it can be folded and carried as luggage. Further advice can be obtained from our JourneyCare call centre.

7.4 Information about our trains

All of our trains have dedicated spaces for customers whose mobility is impaired, including a wheelchair space located within passenger accommodation next to an entrance door and near to an accessible toilet and the onboard customer service staff. At least two wheelchair spaces are provided, one in First Class and at least one in Standard.

Wheelchair accessible toilets are provided on all our trains.

All vehicles have powered interior doors.

Most trains include an onboard shop which is open for the majority of the journey. Assistance dogs are allowed in all coaches on all of our trains. Our onboard staff will also be happy to serve disabled customers food and drinks at their seat if they're unable to visit the shop.

	Pendolino	Voyager
Routes	All routes except London - North Wales, London - Blackpool and London - Shrewsbury	Primarily used on London - North Wales, London - Blackpool, London - Shrewsbury and some London - Birmingham - Glasgow/ Edinburgh services
Space for wheelchair	YES	YES
Wheelchair accessible toilet	YES	YES
Fully compliant with Rail Vehicle Accessibility Regulations	YES	YES



8. Making connections

8.1 Connections to other train services

We'll help you make your connections to other trains when requested, whether they're our trains or not.

We'll make sure we give you sufficient notice aurally and visually if platforms change at short notice, and will give any assistance necessary to any disabled customers.

8.2 Intermodal connections

We'll help you between trains and other modes of transport within the boundaries of our stations.

We specify in our contracts with taxi and bus companies that provisions are made for disabled customers whenever possible, and we prioritise companies with accessible vehicles in our negotiations. Staff at our stations can help disabled customers to arrange their own accessible taxi where necessary. We also have information posters at our stations that give details of other transport operators which serve the station.

9. Disruption to facilities and services

Each Train Manager has details of all customers who have reserved accommodation or arranged mobility assistance through Passenger Assist. Our Control office also has this information to refer to if changes have to be made to the train's itinerary in response to operational contingencies, or in case there's an emergency involving the train.

All onboard staff are encouraged to provide the highest levels of customer service and are empowered to resolve appropriate issues on the spot. All our Customer Service teams can make arrangements for individual customers during disruption to journeys, working with the Customer Service Controllers located in our Control office. In the event of serious delay we focus on the requirements of customers with disabilities or impaired mobility. We encourage anyone requiring help or advice and hasn't booked assistance in advance to make themselves known to the onboard staff.

All our onboard crew have mobile phones available and all Train Managers are constantly in touch with our Control office. These communication links mean customer messages are passed on if travel plans are changed for any reason and, if necessary also organise assistance arrangements if they change during the course of a journey.

In the event that facilities on trains which materially affect disabled customers are out of use (eg. accessible toilets), we will do everything we can to let customers know before joining the train.

Where trains are replaced by other transport, we will give aural and visual information to enable disabled people to find the substitute transport, and provide staff assistance where required.

If customers have booked assistance in advance through Passenger Assist and where, due to late alterations to services it is no longer valid, we will aim to advise them of this and, if necessary, make alternative arrangements, such as re-booking assistance.

If a train changes platform after a disabled person has been helped onboard, staff will return to assist them to re-board at the new platform.

Where services or facilities for disabled customers at our stations are altered or removed we'll provide reasonable replacement services or facilities that are accessible.

We have written procedures for our station and onboard staff to follow in the event of an emergency which deal specifically with the arrangements for dealing with disabled customers.

10. Contact us

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Please let us know what you think about any aspect of our service, including information about facilities which are not working. You can get in touch through any member of our station or onboard teams, at virgintrains. com, by phone, email, post, or fax.

WEDSILE.	VII gintrains.com/contact
Telephone:	03331 031 031 (Answerphone outside normal office hours)
Email:	customer.relations@virgintrains.co.uk

virgintrains com/contact

Post: Customer Relations Manager Virgin Trains Victoria Square House, Victoria Square, Birmingham B2 4DN

 Fax:
 01216547500

 Textphone:
 01216547528 (available during normal office hours)

Normally our Customer Relations team will respond to customers in writing, and if requested to do so will reply in alternative formats such as large print, by telephone, or in audio format.

11. Alternative formats

Copies of the full Disabled People's Protection Policy are available for free from our Customer Relations Manager at the above address. The Policy can be obtained in alternative formats on request such as large print and audio within seven days of the request being received. A copy is also available electronically through virgintrains.com.

12. Station accessibility information

The present position regarding access at our own stations can be found in the Appendix of this document. All stations we manage have Secure Stations Accreditation, awarded by the Department for Transport.

A wheelchair is available at all of our stations, for use on or around the station. At some of the larger stations we serve such as Euston, Manchester and Glasgow, buggies are also available for carrying mobility impaired people around the station.



Appendix: Station facilities at stations managed by Virgin Trains

Information Screens and Public Address systems, seating, hearing loops within booking offices and meeting points. They all have a taxi rank and an accessible set down area.

All of the stations we operate are staffed during the times when trains are calling. They have Customer

Station	Step free access	Step free access note	Low level ticket counter	Number of waiting rooms	Refreshment facility	Wheelchair accessible toilet	Car park spaces	Blue Badge spaces
Birmingham International	FULL	Lifts to platforms	YES	3	YES	On concourse	2,124	24
Carlisle	FULL	Lifts to all platforms plus a ramped footbridge Staff available to assist	YES	2	YES	Platforms 4/6	244	10
Coventry	FULL	Lifts to platforms	YES	2	YES	Platform 1	860	18
Crewe	FULL	Lifts to platforms	YES	З	YES	Platforms 5 & 6	775	18
Lancaster	FULL	Lifts to platforms	YES	2	YES	Platforms 3 & 4	163	6
Macclesfield	FULL	Lifts to platforms	YES	2	YES	Platform 1	53	2
Oxenholme Lake District	PART	Access to platforms 2 & 3 via steep ramp Staff available to assist	NO	3	YES	Platform 1	143	2
Penrith	FULL	Lifts to platforms	NO	2	NO	Platform 1	111	4
Preston	FULL	Lifts to platforms	YES	1	YES	Two on platform 3	1,025	18
Rugby	FULL	Lifts to platforms	YES	З	YES	Platforms 2 & 5	723	16
Runcorn	FULL	Lifts to platforms	YES	2	YES	Platform 1	627	16
Stafford	FULL	Lifts to platforms	YES	7	YES	Platform 1	545	14
Stockport	FULL	Lifts to platforms	YES	5	YES	Platforms 2 & 3/4	1,000	10
Stoke-on- Trent	FULL	Lifts to platforms	YES	2	YES	Platform1	489	13
Warrington Bank Quay	FULL	Lifts to platforms	YES	2	YES	Platform 2 & 3	277	10
Wigan North Western	FULL	Lifts to platforms	YES	2	YES	In the subway	418	18
Wolverhampton	FULL	Lifts to platforms	YES	З	YES	Platforms 1 & 4	483	12

Note 1: There is a Changing Places facility at Crewe on Platform 11.

Note 2: A further 400 car park spaces will be available at Wolverhampton station from early 2017.

Note 3: Virgin Trains also operates the ticket offices/ travel centres at London Euston, Birmingham New Street, Manchester Piccadilly and the Travel Centre at Glasgow Central.

Designated Meeting Points at Virgin Trains stations

Station	Meeting Point location
Carlisle	Information kiosk left of main entrance to station
Penrith	Customer service office platform 1
Oxenholme	Customer service office platform 1
Lancaster	Ticket office
Preston	Information kiosk within waiting room on platform 3
Wigan	Ticket office
Warrington	Ticket office
Runcorn	Customer service office in ticket office
Crewe	Ticket office
Stockport	Ticket office
Macclesfield	Customer service office on platform 1
Stoke-on-Trent	Ticket office
Stafford	Ticket office
Wolverhampton	Ticket office
Birmingham International	Ticket office
Coventry	Customer service office on platform 1
Rugby	Ticket office





Making rail accessible

Guide to policies and practices

Valid from November 2016

Contents

- 1. Our strategy
- 2. Management arrangements
- 3. Monitoring and evaluation
- 4. Access improvements
- 5. Working with others
- 6. Staff training
- 7. Emergency procedures
- 8. Communications strategy
- 9. Car parking



1. Our strategy

We'll maintain and improve current standards of accessibility of our services for people with disabilities, or whose mobility is impaired. We continually strive to deliver a high standard of care to all our customers through our staff and our use of the Passenger Assist booking system. We will prioritise plans and policies that improve accessibility according to value for money in terms of customer service benefits to all customers.



Details of our plans for improving access and services are explained in section 4

2. Management arrangements

This policy is in compliance with the Passenger Operator's and Station Operator's Licences held by West Coast Trains Ltd. It has been approved by the Office of Rail and Road (ORR) and the Executive Group of Virgin Rail Group Ltd, which is the parent company of Virgin Trains and will be formally reviewed every year by this group and the ORR.

The requirements of this policy are integrated into our Business Plan, and into the planning stage of station and rolling stock projects. This is achieved through briefings and provision of the Code of Practice and this policy to our designers, architects and Project Managers. Where projects are undertaken we will review the impact these have had on our customers.

The Executive Group of Virgin Rail Group Ltd is responsible for setting this policy, and the Executive Director of Operations of Virgin Trains is accountable for its implementation.

Through training and briefing all managers and staff are made aware of their responsibilities to help disabled customers.

Our Franchise Manager will make sure our commitments to this policy are carried out through internal checks and regular review of feedback received from disabled customers. We'll consult with the ORR when we believe that these commitments are not being met.

3. Monitoring and evaluation

We aim to provide easy access and excellent customer service, for all customers. We regularly review our arrangements and services and will continue to introduce improvements as quickly as is reasonably practical. We recognise that sometimes small changes, such as clear signs or the clarity and audibility of announcements, can make a significant improvement to the journey of all customers, especially those with disabilities.

We welcome customer comments and will take these into consideration in reviewing and implementing this policy. We'll consider customer feedback in developing spending plans where this suggests specific enhancements that would improve accessibility of our stations or trains.

Where a customer has made a complaint about the service they have received we'll investigate with the responsible line manager and appropriate action will be taken where necessary. We will also consider appropriate compensation depending on the circumstances.

As well as taking direct feedback from customers, we also conduct market research through an independent agency twice per year with customers who have used the assisted travel service, to assess reliability of delivery and satisfaction with the service. This feedback is reviewed by our cross-functional Journey Care group, which meets regularly. We will also take note of research findings from surveys undertaken by Transport Focus.

We will provide a report to the ORR each year explaining our progress towards meeting the objectives within this policy, and detailing the outcome of market research undertaken in order to understand levels of customer satisfaction with various aspects of the service provided. Any problems with any aspects of the policy will be raised with the ORR as they arise.



4. Access improvements

We'll adopt the services, standards and guidance in the Department for Transport's "Design Standards for Accessible Railway Stations: A Code of Practice" (March 2015) (The Code of Practice), with regard to activities within our direct control, and also take into account requirements within the Equality Act 2010. We will work with other rail industry partners to ensure complementary activities such as station services are supplied under contract. This policy will be reviewed when updates to the Code of Practice are made by the Department for Transport (DfT).

If dispensation from the Code of Practice or PRM/TSI is needed for rolling stock refurbishment, or new, renewed or improved facilities and services on trains or at stations, this will be sought at an early stage in the design process, but only after every effort has been made to meet the standards in the Code of Practice and also the PRM/TSI.

We've made substantial improvements to accessibility at stations we manage. The facilities and arrangements currently provided for disabled customers are detailed in the publication "Making Rail Accessible: Helping Older and Disabled Customers".

We have implemented a programme of minor works to deliver improvements in accessibility at all the stations we manage. This has covered areas such as improved signage, accessible toilet modifications, improving handrails, installation of low-level ticket office counters and improvements to arrangements for meeting customers who have arranged assistance, and will be developed to accommodate further similar projects in the future.

4.1 Improvements Delivered in the Years April 2014 - March 2016

Some examples of accessibility improvements made at our stations during the two years to March 2016 include:

- A "Changing Places" toilet at Crewe station with a changing facility for disabled people who require special facilities such as hoists
- Staircase handrails at Preston Station
- A power-operated door into the booking hall at Oxenholme
- Improved signage to help wayfinding around the station at Wolverhampton
- Improvements to accessible toilets at Birmingham International and Lancaster
- Installation of some automatic doors at Lancaster and Warrington Bank Quay

4.2 Improvements Currently Underway

The list of works which are due to be completed in the year April 2016 – March 2017 includes:

Carlisle	Installation of new auto doors to station entrance. Upgrade surfacing to overbridge to make ramps more accessible. Open out customer services office and install new counter to make it wheelchair accessible. Conversion of a ticket counter to be wheelchair accessible.
Birmingham International	Alter layout of concourse toilets to make Ladies and Gents fully accessible.
Coventry	Resolving level access issues throughout station. Installing new ramps to customer services offices and auto-doors.
Macclesfield	Refurbishment of accessible toilet on platform 1 to be fully accessible for wheelchair users.
Stafford	Platform waiting rooms - automate existing doors. New auto doors to overbridge waiting room.

4.3 Schemes Involving Third Parties

Where third parties contribute funds towards station improvements we'll make sure that accessibility improvements form part of these schemes. For example our customer reception office has been improved at Stockport with low-level counters.

4.4 Future Plans

Working with the DfT we'll continue to explore more ways to improve our stations through the Railways for All Small Schemes fund.

Through the Rail Industry's Access for All fund, a new footbridge with lift access to both platforms at Penrith station, is due to be completed in Autumn 2016.

5. Working with others

Many of our customers start or finish their journeys with other Train Operating Companies, or at stations operated by other companies. We'll liaise with these operators to review interchange arrangements for all customers and improve them where we can.

We've consulted with the Disabled People's Transport Advisory Committee (DPTAC), Transport Focus and London TravelWatch, and will continue to consult with them and the ORR when proposing changes to this policy. It is a living document, which will be reviewed and updated as necessary. It will be submitted to the ORR annually from the date of approval and no changes will be made without the agreement of the ORR.

We also liaise with national disabled organisations, such as RNIB and Motability, as well as groups of disabled people such as the National Rail Accessibility Forum and Network Rail's Built Environment Accessibility Panel. All suggestions for improvement are reviewed by our cross-functional Journey Care group, which meets regularly to review policy issues and customer feedback.

6. Staff training

Disability awareness is a part of our staff customer service training programmes and includes all definitions of "disability" including, for example, those temporarily disabled through illness, injury or surgery, sufferers from epilepsy, ME, arthritis, or cerebral palsy, and people with learning difficulties, dementia, impaired vision or speech impediments, in addition to wheelchair users.

Other staff, including management, are also briefed to improve disability awareness and we continuously improve the quality of our training programmes through consultation with individual customers and specialist bodies. We also provide training in using accessibility equipment such as ramps and induction loops, and also in communication skills with people who may have difficulty speaking, hearing or understanding. Details of our staff training, including the numbers of people trained, will be provided to the ORR annually or as otherwise requested.

As an example of progress being made, 235 West Coast onboard and station staff underwent disability awareness training during 2015 as part of their orientation course. In addition, all staff in our JourneyCare call centre completed an e-learning training package produced by ATOC. This includes a module on disability awareness and in total over 60 agents and support staff went through this training.

7. Emergency procedures

We recognise that disabled customers may need extra assistance at times of train or station evacuation. We have written procedures for our station and on board staff to follow in such circumstances that deal specifically with assisting disabled customers.

Procedures vary from station to station, and by type of train. As a general principle, disabled people will be assisted along with all other customers at times of evacuation. Where this may not be physically possible, or cannot be achieved safely, disabled customers would be helped to a place of safety to await developments, and in some cases the attendance of the emergency services.

8. Communications strategy

We make our Disabled People's Protection Policy available through our website and advertise its existence on posters at stations. We will also circulate it to disability groups we meet from time to time.

8.1 Telephone

Where provided, such as in our Customer Relations and JourneyCare call centres, our textphones have a dedicated telephone number. Recorded information provides an option to be connected to an operator.

8.2 Websites

Our website takes into consideration the needs of disabled people with a variety of impairments. In developing our new website which was launched in September 2015 we have done our utmost to ensure it adheres to level A of the W3 Web Content Accessibility Guidelines 2.0, and we are now working towards achieving level AA.

We promote the availability of the assistance service to our disabled customers through this website.

8.3 Signage

We work with local authorities to make sure that directions to our stations are clearly signposted and we'll address any deficiencies with the relevant local authority.

Where signage improvements are planned within our stations, we will take account of the good practice guide published by the RSSB into Wayfinding at Stations.

9. Car parking

At our stations the level of legitimate usage of 'blue badge' holder car parking spaces will be monitored regularly, as well as the level of usage by motorists who do not hold these badges. Where misuse of blue badge spaces is discovered, a suitable notice will be placed on the vehicle advising of the relevant byelaw being contravened.

We will review requirements and, if legitimate demand regularly exceeds the available 'blue badge' spaces, we will provide extra spaces if we can. Any new disabled parking spaces or spaces that are re-lined will be compliant with the dimensions specified in the Code of Practice.

