

## Improving Assisted Travel

### A consultation on changed to guidance for train and station operators on Disabled People's Protection Policy (DPPP): pro forma

This pro forma is available to those that wish to use it to respond to our DPPP Guidance Review consultation. Other forms of response (e.g. letter format) are equally welcome, though we would be grateful if these could be structured broadly in line with the areas listed below (where you wish to comment), to aid our review of responses.

Please send your response to [DPPP@orr.gov.uk](mailto:DPPP@orr.gov.uk) by **18 January 2019**.

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#### Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

##### Q1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?

We support the need to change the policy title but would prefer 'Assisted Travel Policy'. 'Accessible Travel Policy' seems to be too strongly linked only to the needs of disabled persons and 'Inclusive Travel Policy' seems too broad in its scope. But nevertheless, if we had to choose between two alternatives offered, we would prefer 'Accessible Travel Policy'.

#### Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

##### Q2. What are your views on our proposal to replace the current passenger-facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?

- a) Is there anything you consider is missing from the required content?
- b) Is this still a meaningful title for this leaflet?

- a) The content seems comprehensive and commendably shorter than the existing leaflet; it would be difficult to say more without going into specific station details. The leaflet should also be on the operator's website and have links to it from the National Rail Enquiries, Network Rail and Passenger Focus websites.
- b) It does seem a bit too long-winded. How about 'Getting Help with Your Journey'? (should the term 'Passenger Assist' also appear in the leaflet to make it clear that this is a term that operators' staff will immediately understand?)

### Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

#### Q3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?

This seems a sensible step, which will also help to shorten the length of the passenger leaflet. The web version of the leaflet should have a link to this information in the web version of the policy document. **Accessibility at major stations should be shown prominently or highlighted.**

### Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

#### Q4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?

We fully support the proposed changes, which will ensure that the operators' policy documents are more relevant to passengers' needs and kept up to date. In order to ensure feedback from user groups has been taken into account, we suggest that operators are asked to **demonstrate** that they have consulted such groups, rather than simply **confirming** they have consulted them. We would be happy to take part in any broader consultations, or in more detailed ones via our Branch network or our affiliated Rail User Groups.

### Updating the Disabled People's Protection Policy (DPPP) guidance for operators (Chapter 2)

**Q5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?**

There is clearly a need for a form of classification, but there is a risk that making it too complicated could cause confusion to staff who have to use it. There may also be particular stations which do not fall neatly into the proposed categories. **The requirement to ensure that the National Rail Enquiries station pages contain the up-to-date information on accessibility is paramount (Section 4 A1 k refers).**

### Reliability (Chapter 3)

**Q6. What are your views on the introduction of mandatory checks on station accessibility information at the assistance booking stage?**

We fully support these checks, but it is not clear how they will be carried out or at what frequency.

### Reliability (Chapter 3)

**Q7. What are your views on the development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?**

This is an important requirement and essential for first time users. Good communication about how their journey will be handled is very important. This information should be on the NRE website and each operator's website and provided as part of the booking confirmation. It should be offered in printed form to first time users who book in person at stations and don't have internet access.

### Reliability (Chapter 3)

**Q8. What are your views on the introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?**

We welcome the introduction of this protocol, which should improve assistance failures.

### **Reliability (Chapter 3)**

**Q9. What are your view on the introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?**

This seems a very helpful improvement. The definition of 'GB mainline stations' needs to be clear and agreed with the Rail Delivery Group, NRE and operators.

### **Staff Training (Chapter 4)**

**Q10. What are your views on our training proposals? Do you agree with the proposed content?**

Yes and agreed it is important to include temporary and contract staff.

### **Staff Training (Chapter 4)**

**Q11. Do you agree that:**

- **operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**
- **the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

a) Yes

b) Given the large variation between operator's stations and their rolling stock, it should be tailored to the priority areas for each individual operator.

### Passenger Awareness of Assisted Travel (Chapter 5)

**Q12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?**

We fully support these recommendations. We also suggest that Passenger Assist information is included when issuing Senior Railcards and on the Senior Railcard homepage.

### Passenger Awareness of Assisted Travel (Chapter 5)

**Q13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?**

We fully support this proposal, which should also help to encourage greater use of rail services. We would be happy to take part in any broader consultations, or in more detailed ones via our Branch network or our affiliated Rail User Groups.

### Passenger Awareness of Assisted Travel (Chapter 5)

**Q14. What are your views on the proposal for more prescriptive website requirements?**

An excellent step forward to improve website accessibility and avoid confusion over terminology.

#### **New requirements and updates in DPPP Guidance (Chapter 6)**

##### **Q15. What are your views on the three options for reducing the notice period for booked assistance?**

Option 1 – unless linked to extension of contact centres' opening hours – could cause confusion to those booking assistance. Whilst Option 2 or 3 would be a great step forward, it is clear that it would be impracticable for operators to implement either of these in the short term. A phased approach is clearly needed – see answer to Question 16.

#### **New requirements and updates in DPPP Guidance (Chapter 6)**

##### **Q16. How do you consider any reduction might be phased in? If so, how might this happen?**

Given the planned implementation timetable for the revised guidance (expected to be issued by end of 2019), a phased approach on the following lines (subject to consultation with the Rail Delivery Group and/or operators) could be the best way forward:

Option 1 - 2020; Option 2 – 2021; Option 3 – 2022 or possibly later. It might be worth having a short trial next year of Option 3 with an operator who currently requires a minimum of 24 hours.

#### **New requirements and updates in DPPP Guidance (Chapter 6)**

**Q17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?**

We welcome these proposals. Risk assessments should be carried out as a minimum at all stations which are unstaffed or staffed only at certain times and at all stations where DCO or DOO is currently used or planned. Such assessments could be incorporated into the operators' regular risk assessments in order to save staff time. ORR should seek evidence that all these assessments (which should be repeated at regular intervals) have been completed.

### **New requirements and updates in DPPP Guidance (Chapter 6)**

**Q18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?**

We agree that mandatory redress should be offered in all cases where failures occur and that the form of redress should be left to the operator. It is also essential that ORR monitor the rates of failure and redress offered. The requirement for operators to provide redress should be promoted as proposed, including the option of contacting the Rail Ombudsman if the passenger is unhappy with the redress offered.

### **New requirements and updates in DPPP Guidance (Chapter 6)**

**Q19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?**

It is important the deaf or speech-impaired passengers can contact operators by text relay. Action on Hearing Loss should be consulted on any technical issues.

### **New requirements and updates in DPPP Guidance (Chapter 6)**

**Q20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?**

We fully support these proposals, including the need to work with third parties. Local authorities' transport teams and taxi licensing departments should be able to offer useful information. Regular monitoring by ORR of operators' practices - especially the frequent use of non-accessible coaches on rail replacement work – will be needed.

**New requirements and updates in DPPP Guidance (Chapter 6)**

**Q21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?**

This is essential to avoid passengers being “abandoned” - especially at destination stations or when changing trains or to another travel mode (eg London Underground). A freephone number should be provided in **all** cases and a help point or must be offered at all unstaffed or partially staffed stations.

**New requirements and updates in DPPP Guidance (Chapter 6)**

**Q22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?**

These proposals seem comprehensive, although we are not experts in this topic. The key issue seems to be to avoid different practices by different operators and these proposals seem to address this issue, as well as the importance of making clear to scooter users what the rules are.



## New requirements and updates in DPPP Guidance (Chapter 6)

**Q23. What are your views on our proposals to clarify the guidance to ensure:**

- a) passengers do not purchase tickets they cannot make use of; and**
- b) Operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

(a) We fully support this requirement., which is very important where passengers are alighting or changing at an unstaffed or partially staffed station or planning a journey which involved rolling stock which does not have an accessible toilet. All operators and ticket agents need to be made aware of this requirement , with real-time links provided to ensure the information can be obtained by them, irrespective of the journey routeing or operators' service involved.

(b) We fully support this proposal, with similar publicity and IT links as at (a).

## Good Practice (Chapter 7)

**Q24. Do you have any comments on the good practice areas listed? Are there other good practices that should be referred to in the revised Guidance?**

Good practices should be highlighted to oeprotors as part of the issue of the revised Guidance.

**Q25. Do you have any other comments or views on improving Assisted Travel?**

Your proposals do seem pretty comprehensive. We like the plans to consulting operators, users groups and local authorities on major changes whilst recognising the importance of mandatory checks and ongoing monitoring.

Thank you for taking the time to respond.