

Response to the Transport Select Committee's Inquiry Effectiveness of legislation relating to transport for disabled people

Introduction and Background

1. Passenger Focus welcomes the opportunity to present evidence to the Committee as we and our predecessor bodies have long been concerned with many aspects of transport accessibility. We undertake the (rail) National Passenger Survey (NPS) and the Bus Passenger Survey (BPS) to gauge passengers' views during the journey being made at that time. The results of recent waves are discussed below.

2. We acknowledge the huge strides made in enhancing accessibility of the public transport network in recent years; this improvement is borne out by our research findings, yet parts of the network remain inaccessible to some people – or those people believe it to be so. Even where it is technically accessible, potential passengers may not be able to obtain sufficient details to assure them that the journey is possible. Some disabled people have attempted to make journeys by public transport but found the experience too difficult to repeat, or the expected assistance has proven ineffective or has failed entirely. Demand for accessible public transport can only increase as the population ages and people still wish to retain their ability to travel, especially if age, disability or resources prevent them from using private transport. The general increase in population will fuel further demand for public transport.

3. We welcome the publication late in December 2012 of the Department for Transport's (DfT's) report *Transport for Everyone: an action plan to improve accessibility for all*. It echoes many of the points which we make in this response

4. We are convinced of the benefits which sound guidance, specialist advice and knowledge can bring to disability matters in the field of transport. DPTAC currently performs this function but Government is consulting on future arrangements. Whatever the decision we believe there is a need for a forum which can harness collective expertise and knowledge on disability matters and give advice based on that experience. Such a body must have an over-arching concern with all forms of transport and interchange arrangements.

What passengers tell us

5. We undertake the twice-yearly National Passenger Survey (NPS), seeking rail passengers' views on train services and facilities. We have extended this work to buses and undertake the Bus Passenger Survey (BPS) to obtain the views of bus passengers. As part of both surveys respondents are asked to indicate if they have a disability or long-term condition affecting their ability to use public transport. Two reports (one each for rail and bus) based on these responses from disabled passengers were drawn up in autumn 2012 – copies are enclosed with this submission.

6. **Rail** (based on an analysis of 6,730 disabled respondents' views from the autumn 2010-autumn 2012 NPS)

- Around 5% of passengers surveyed considered that they have a disability or long-term illness with half of these journeys being made by those with impaired mobility
- While the majority of trips were for leisure purposes around 40% of journeys were in peak time (30% commuting and 10% for business)
- Almost 75% of disabled passengers travel alone, although this figure drops to 36% for passengers with wheelchairs. More than half of passengers with wheelchairs travel with other adults
- Only 43% of respondents used a Railcard although 62% travelled at a time when a Railcard discount would have applied.

7. **Bus** (based on an analysis of 5,506 disabled respondents' views from the autumn 2011 wave of BPS)

- Around 20% of journeys are made by passengers with a disability of which 37% were being made by passengers with impaired mobility
- Passengers with mobility issues were most likely to be retired and using the bus for a shopping trip while passengers with a speech or learning impediment were more likely to be younger and in full-time work
- disabled bus users are less likely to have access to another means of transport
- particular concerns apply to bus driver behaviour: e.g. facing passengers as they board; not pulling away from the stop until older/disabled passengers can sit; stopping adjacent to the kerb; general driving style, avoiding jerks.

8. In both surveys the levels of satisfaction were similar between those with disabilities and those without, with the obvious exception of the ease of getting on and off trains and buses.

9. While these views are highly informative it must be noted that they do not reflect the views of all disabled people since many cannot use public transport at all. We know that some potential passengers cannot reach bus stops or stations because, for instance, path or pavement conditions do not permit.

Question 1: The effectiveness of legislation relating to transport for disabled people: is it working? Is it sufficiently comprehensive? How effectively is it enforced?

10. The effectiveness of legislation is difficult to establish as it is hardly measured. Use of Disabled Persons Railcards and concessionary bus passes for disabled people gives a slight indication of the numbers of people travelling; holders of these travel documents form an excellent base for future research. As we mention above, our own on-train and on-bus research can be used to analyse feedback from disabled passengers.

11. Effective enforcement is equally difficult to assess. For instance, it seems to us that no records are kept of the frequency of bus ramp breakdown; neither are details of car-parking restrictions at bus stops maintained. It is unclear what checks are made on rail's recently-introduced Passenger Assistance booking service. We have pressed for train operators to contact at least a percentage of booked passengers within 48 hours of the journey for feedback on the effectiveness of the assistance arrangements. We also want the rail industry to publish figures for the number of bookings taken and the number delivered. Perception of accessibility is important; were the industry to publish what we believe would

be a favourable score it could well act as a spur to persuade others to trust the system. Satisfaction measures alone, however, do not tell the whole story as we know that some disabled passengers' expectations are low and they are grateful simply to have been able to undertake the journey irrespective of the level of service provided.

12. The design of buses, trams and trains is strictly specified to ensure a compromise satisfying, as far as possible, the mutually incompatible needs of different categories of passenger within a single vehicle. Operators are abiding by the requirements of the law as far as vehicle layout and facilities are concerned, seeking legal exemptions where layouts cannot comply. However, even where the letter of the regulations is scrupulously observed, the spirit of them can be missed. The outcome for the disabled passenger may be worse than it might have been if more sympathetic consideration had been applied at design stage: e.g. the height of door controls varies between trains; controls may be on different sides of doorways from one vehicle type to another; over-complex toilet-door locking mechanisms; a wheelchair space may be provided, but without any provision of room within it for a companion, with the result that the wheelchair user travels in total isolation – which may be tolerable on a 15-minute bus ride but not on a long train journey. Not all trains and relatively few buses have both aural and visual information facilities.

13. One particular area that needs addressing is the application of the legislation regarding wheelchair spaces aboard buses. There is a clear requirement for buses to have such spaces and for signs to be displayed indicating this, but little clarity regarding who has priority and how to enforce this. Signage must comply with the regulations and the intended purpose of specifically marked areas within vehicles should be clear, as should those categories of passenger who have first call upon such accommodation. Applicable signage must be visible at all times – not obscured once a seat is occupied – and explain entitlement, which it often fails to do.

14. We welcome the fact that adapting the system to simplify travel for disabled passengers also benefits the wider travelling public. Use of an empty wheelchair space by a push-chair must be permitted. What order of precedence applies, however, should a wheelchair user seek to board that vehicle later in its journey? Conflict is arising over the priority of allocation of space, especially aboard buses where space is at a greater premium. Bus staff and passengers require clarity and guidance. In the rail domain, a wheelchair user has automatic priority in the dedicated space; on trains “pushchairs/carrycots” are carried free of charge but must be “capable of folding”¹.

15. The differing interpretation of the law by some bus companies, some operators' failure to enforce the apparent intention behind the legislation and some passengers' failure to understand and observe the arrangements to ease travel for disabled people are combining to cause difficulties. This inconsistency has led to a situation whereby wheelchair users in Swindon, for instance, face the diametrically opposed policies of the two operators which provide the vast majority of services in the town, often on overlapping sections of route:

¹ National Rail Conditions of Carriage, May 2012 edition: Appendix B, page 29.
Full details are available at: http://nationalrail.co.uk/times_fares/nrcc/NRCOC.pdf

- Thamesdown Transport: wheelchair spaces are provided on a first-come, first-served basis; a wheelchair user can only occupy it if passengers already in it can be accommodated elsewhere aboard the vehicle according to its Conditions of Carriage².
- Stagecoach Bus (which operates many routes in Swindon): by way of contrast, its Conditions of Carriage, Section 5, show the exact opposite³.

16. Inconsistency and lack of clarity on priority has led to a court case, currently underway, in north-eastern England. We await the outcome of this case with interest, as it could set a legal precedent. (Although beyond our remit, we note the campaign begun recently by London Buses to highlight that wheelchair spaces are intended for wheelchair users - not for prams, luggage, standing passengers etc.)

17. A similarly blurred arrangement applies in the enforcement of priority seating; the law requires that it be provided, and specifies the ratio of such seats in regulated road and rail vehicles. Yet no mechanism exists to evict from such seating those whose need is less than those for whom it was installed. Staff need to be empowered and trained to deal with such situations. We understand the difficulties of proving greater need – especially if “hidden” disabilities are involved. An innovation intended to reduce such friction, introduced by Southern Railway several years ago and since adopted by some other train operators, is the Priority Seat Card⁴. A major component of the scheme is the much-enhanced identification of priority seating, both within the carriage and from the exterior. Prominent station posters further support the scheme.

18. We encourage all transport undertakings to introduce schemes such as travel support cards which, for instance, passengers with learning or communication difficulties can use to indicate their needs to drivers. These are particularly helpful in the case of ‘hidden’ disabilities. Several larger operators, e.g. First Bus, offer such help⁵.

19. Increasing use of mobility scooters further confuses the picture. We recognise that they are a major mobility boon to many people, but the size and weight of some scooters deny them access to trains and buses. The rail industry has now almost fully resolved the issue of which scooter models can be carried on which types of train, with various schemes in place. However, many journeys cross franchise boundaries and clarity is needed to help scooter users to travel without incident if their machines conform to the various rail companies’ regulations. It is less clear to us how bus operators deal with carriage of mobility scooters.

² Thamesdown Transport’s Condition of Carriage 65 states: “A wheelchair user does not have any priority over any other passenger on the bus and the space designated to accommodate wheelchair is available on a first come, first served basis.” The full Thamesdown Transport Conditions of Carriage can be found at:

<http://www.thamesdown-transport.co.uk/index.asp?m=207&s=231&c=1473&t=CONDITIONS+OF+CARRIAGE>.

³ Stagecoach’s Conditions of Carriage (Section 5, paragraphs 4 and 5) state: “You are, however, required by law to ensure that the designated wheelchair space is made available if a customer wishes to board with a wheelchair or approved mobility scooter” and “You are required to co-operate in allowing proper use of the designated wheelchair space by vacating this space if it is required by a customer in a wheelchair or approved mobility scooter including repositioning small prams, folding any buggies and storing them in the luggage space.”

The full Stagecoach bus Conditions of Carriage can be found at <http://www.stagecoachbus.com/conditionsofcarriage.aspx>

⁴ Fuller details can be found at <http://www.southernrailway.com/your-journey/accessibility/priority-seat-card/>.

⁵ Fuller details can be found at <http://www.firstgroup.com/safejourney>.

20. The law calls only for 'reasonable adjustments' to be made to ensure the disabled passengers' needs can be addressed. In the rail sphere, much has been achieved in recent years, a good deal as a result of the Department of Transport's *Railways for All* funding, to ensure a step-free network of hub stations. Unlike in many countries, rail-service companies in Britain must provide a taxi to/from an inaccessible station at no additional cost to the passenger. While not ideal, it does at least make the rail system as accessible as possible as not all stations have yet been adapted and not all stations will be. Such facilities and schemes offered by rail companies are largely not available to bus passengers. We commend those bus companies who provide a taxi for wheelchair users if an advertised low-floor bus is unavailable and recommend that other operators follow such good practice.

21. For bus passengers, the law requires reasonable adjustments to the 'road landscape' and that the driver does not discriminate against a person on the grounds of disability. The situation for bus users is further hindered as 'streetscape and furniture' are generally dealt with by council highways departments not transport departments and therefore can suffer from a lack of co-ordination. Furthermore, while legislation requires buses to be fully accessible by 2017, no such requirements apply to the accessibility of bus stops.

22. We recognise the enormity of the task in relation to bus stops. In rural areas especially, bus stops may not be on pavements, requiring a higher step up/down between the vehicle and road level than would otherwise be necessary and which may be too steep for a wheelchair ramp to be deployed. Even where Kassel-style raised humps have been installed, failure to create and/or enforce parking restrictions around bus stops often means that vehicles cannot pull up against the kerb which hampers or even prevents access.

Question 2: The accessibility of information: including the provision of information about routes, connections, timetables, delays and service alterations, and fares.

23. The law requires information about services and facilities to be available in many formats. It is vital that such information in accessible formats is available to enable disabled passengers to plan their journeys. They need details, not only of timings and perhaps of fares, but also of the accessibility of the stations, bus stops and vehicles which they will use. Also important to many are details of suitable toilets en route. This latter information is usually readily available for rail journeys but less obviously so for bus journeys.

24. Such advance information is available to rail passengers in print, Braille, audio or other format and online. Bus information tends to be less readily available; leaflets can be obtained from bus-station travel offices but at bus stops, by their nature unstaffed, usually little beyond theoretical timetable information is offered. Information is not available generally about bus-stop accessibility: is the pavement to reach the stop usable?; is the footway surface on which to wait paved?; does it have a shelter?; is the shelter accessible by a wheelchair user?; is a seat provided?; is real-time running information provided?; and, perhaps most important of all, will the bus stop for me if I cannot distinguish it amongst other traffic, or recognise its route number, as it approaches? Some local authorities (e.g. Cheshire for passengers with impaired vision and Devon for all disabled passengers)

provide fluorescent bus-pass wallets for pass holders to show as they wait at the stop, alerting drivers to their needs.

25. The rail industry is required to produce detailed descriptions of the arrangements and the level of assistance which can be given to passengers travelling by train. Each rail company's website gives details of train times and fares. So does the National Rail Enquiries website, its telephone information line and an ever-expanding range of new options and "apps" for checking theoretical and/or actual timings. In addition, the National Rail Enquiries website's *Stations Made Easy* database⁶ illustrates the layout of each station, indicating the features and facilities available there, complemented by photographs to enable potential passengers to better assess whether the station will be accessible for them. Text panels offer additional information about features such as ticket-office opening times; the times when staff are available to assist; if blue-badge parking spaces are provided, etc. This is welcome but must be kept up to date – we have found a number of instances when this has not been the case. If passengers are relying on the information it must be accurate.

26. The bus industry cannot provide the same uniform level of detail as the railway. Some individual operators are better than others at providing information. Planned timetables are usually quite easy to find, but details of point-to-point fares are quite difficult to come by⁷, a point reinforced recently by regional representatives of the Youth Council, whose ability to access all sources of information – printed, telephonic and digital – failed to enable them to find fares. Information for journeys involving more than one operator can be even more complex to find unless the enquirer is referred to Transport Direct.

27. Information at many bus stops consists only of a printed timetable or a telephone number to contact (usually by text) for details of planned next services, at best. Many bus stops lack even this basic level of information. Many urban bus stops have no means of advising passengers of delays to services. Even where information is provided, virtually none at bus stops is aural, only visual, putting passengers with sight loss at an immediate disadvantage. In saying this we do recognise and appreciate the challenge and scale of attempting to improve the quality of, and facilities at, bus stops. Manchester alone, for instance, has considerably more bus stops than there are railway stations in whole of Great Britain.

28. Details about service alterations and delays, especially where short-notice changes due to unforeseen circumstances occur, can be difficult to obtain by all passengers, but especially so by disabled passengers. A wider problem for disabled passengers is the format in which such information is given. Aural announcements alone are of no benefit to passengers with hearing loss, who may be wholly unaware that any disruption has occurred. Passengers with learning difficulties may need assistance in continuing their journey if their intended arrangements are interrupted. Bus passengers are in a worse predicament as, unless at a bus station, no staff are available to advise of an alternative means of travel.

29. Greater use of social media would be of benefit, although we recognise that not all passengers rely on, or even have access to, such media - at least at present. Some

⁶ Further details are available at http://nationalrail.co.uk/stations_destinations/

⁷ Passenger Focus has experienced difficulty in finding basic bus fares in England; few are shown online and details of telephone contacts are hard to come by. Conversely, point-to-point rail fares are much easier to find, by telephone or online.

companies “tweet”, but not all. Research⁸ which we have undertaken with rail passengers involved their requirements from such media, especially when services were disrupted.

30. In cases of disruption, rail passengers with booked journey assistance will need to have the arrangements altered to reflect their revised journey plan. Depending on where the disruption occurs, insufficient number of staff may be available to undertake these tasks – or worse still, no staff at all. In areas such as these the new assistance-booking scheme should provide better assistance than was previously the case. Unplanned disruption seriously inconveniences all passengers but disabled people are particularly vulnerable in such situations and have not always been afforded the care and attention they require. Rail has the benefit that most – though not all – trains have on-board staff other than the driver and many stations – though not all – are still staffed for at least part of the day.

31. Where passengers intend to continue their journey by a different mode, the lack of joined-up information presents another obstacle and the potential for passengers to be stranded. At London termini, for instance, liaison arrangements between National/Network Rail and Underground staff are well co-ordinated allowing easy interchange. However, the same smooth intermodal transfer does not often apply at other places where a journey continues by bus, especially if the bus stop is not actually situated on the station forecourt.

Question 3: The provision of assistance by public transport staff and staff awareness of the needs of people with different disabilities.

32. Training of staff is paramount to ensure appropriate assistance. Each company and industry would still need to concentrate on the particular aspects of its own operation and policies, but some universal basics apply across the entire transport industry and also apply to shipping and airlines. Perhaps some basic national standards/NVQ-style training would be appropriate. The amount of time spent on training and its content varies. The development of national guidelines on best practice would be helpful in relation to understanding disabilities and communicating.

33 We stress the need for transport operators to include disabled people and their representative organisations⁹ in drawing up suitable training. It is vital to ensure that transport staff and bus drivers understand the needs of disabled passengers and learn how to best meet them. To a certain extent also, passengers need to understand the extent to which assistance can reasonably be provided.

34. Staff training and attitudes are arguably more important than detailed legislation. Legislation cannot *ensure* that bus drivers pull up against the kerb; or allow passengers to reach a seat before driving away; or advise passengers that the bus is approaching their intended destination if automatic information systems are not in place or unsuitable for the passenger. Circumstances such as these demonstrate the benefits of full training.

⁸ Passenger Focus has undertaken research into rail passengers’ experience of and needs from social media (such as Facebook and Twitter). It looked at social media’s role in communicating with passengers when trains are disrupted, as well as other ways in which train companies use social media. The report from this research, *Short and Tweet*, is available at: <http://www.passengerfocus.org.uk/research/publications/short-and-tweet-how-passengers-want-social-media-during-disruption>

⁹ Some organisations take the initiative - e.g. the Royal National Institute of Blind People’s good practice and standards guides to help the rail and bus industries better understand and meet the needs of passengers with sight loss.

35. We welcome campaigns such as RNIB's "Stop for me, speak to me"¹⁰ to highlight the difficulties faced by passengers affected by sight loss when trying to catch buses. It is disappointing that operators' behaviour still requires such initiatives. We also recognise the support provided by local-authority independent-travel training schemes, such as that in Devon¹¹. We have concerns that increasing pressure on shrinking local authority budgets must raise doubts over the possibility of maintaining such schemes.

36. Rail service operators must provide an assistance service, details of which are set out in its DPPP. While disabled passengers are not obliged to give notice¹² of their journey, and are assisted as well as possible if they present themselves unannounced, better assistance can usually be provided if it has been booked. We welcome the best practice of some operators by reducing the amount of notice required for travel within their own network. Until spring 2012 bookings were made using the *Assisted Passenger Reservation System* (APRS) which was not wholly fit for purpose. Due to the known failings of APRS, in 2008 we undertook field research with volunteer disabled passengers on dozens of journeys covering a wide selection of trains and stations of all franchised operators, of trains of all open-access operators and of all stations managed by Network Rail. The survey results showed that while some journeys passed off smoothly, more progress was necessary as the industry still had some way to go to give disabled passengers confidence about using the railway.

37. In 2010 we undertook another broadly similar survey. This showed some improvements, but inconsistent provision of both information and assistance persisted. A major obstacle was still the failure to inform front-line staff of passengers' needs or the failure of staff to react to such bookings. We recommended and looked forward to a purpose-built booking and communication system to help deliver much-enhanced assistance, especially to cater for the demands of the Olympic Games. We welcomed the industry's *Passenger Assistance* service launched in 2012 in time for the Games. We shall seek details from the rail industry on the performance of Passenger Assistance's operation so far. We would like to undertake our own further mystery-shopping research in 2013 to assess the situation for ourselves – if funding permits. By that time the new system will have been in place for about a year.

Question 4: What can be learnt from transport provision during the Paralympics and how can we build on its successes?

38. The success of transport during the Paralympic (and the Olympic) Games on the railway can be attributed largely to several key factors, some which cannot be reproduced under general operating conditions at other times:

- Overall planning: undertaken in good time; thorough; involved all relevant stakeholders.
- Staff training: trained to assess disabled passengers' needs and how best to help them.

¹⁰ Royal National Institute of Blind People's *Stop for me, speak to me* campaign on bus use. For further details see: <http://www.mib.org.uk/getinvolved/campaign/gettingaround/buscampaign/pages/stop4me.aspx>

¹¹ Further details are available from www.devon.gov.uk/index/transportroads/public_transport/independenttravel.htm. The scheme helps young people develop skills for safe, independent travel. Two accredited Travel Trainers work with students from mainstream and special schools, pupil referral units and colleges of further education.

¹² Most rail companies recommend at least 24 hours' notice for assistance. .

- Availability of staff: the success of the arrangements must be at least partially attributable to the availability of larger-than-usual numbers of staff at stations and for a longer part of the day. This included not only assistance staff but also those providing information and way-finding help. Behind-the-scenes staff also assisted in ensuring that services ran. It should also be borne in mind that the success was also attributable to the large number of volunteer staff.
- Improved assistance-booking service: early indications suggest that the recently-introduced Passenger Assistance service operated by the rail service companies lived up to expectations and no significant failures were reported during these two busy periods.
- Installation of equipment to create step-free environments: facilities were in place to ease disabled passengers' journeys - mainly physical features such as lifts and fixed ramps. Some 90 National Rail stations benefited from access improvements for the Games.
- The total absence of planned engineering works: all booked arrangements should have been unaffected as far as could be predicted. If any unexpected work did take place more staff could concentrate on assisting the passengers affected. The absence of disruption through planned engineering works enabled the system to run with unparalleled ease. This was a unique phenomenon.
- Fewer passengers travelling the peak: many trains were noticeably quieter than usual. ODA's travel demand management scheme to encourage passengers to alter their journey, the time of their journey or not to travel at all was heeded.
- Additional signage: way-finding was made much clearer, reducing the need to ask staff, and thereby releasing those staff to provide fuller assistance where it was most needed.
- The nature of the occasion: all transport operators understood the need to ensure ultra-efficient operation under the glare of worldwide media to avoid the international opprobrium which would arise from any significant failure.
- The sum of the parts: the combination of these factors working in concert.

39. While the fixtures and fittings remain in situ as a Games legacy, it is less obvious how soon in future, for instance, lifts will be repaired or whether staff will always be available to assist wheelchair users to board or alight at some stations. This is especially of concern where only the ticket office is staffed and where trains operate with no on-board staff but the driver. The proposals to remove ticket-office staff from many stations as a cost-cutting measure will jeopardise current assistance arrangements at these places. While as a last resort a taxi is provided between an inaccessible station and a staffed, accessible station, some journeys can be very long; a taxi does not have the same facilities aboard as a train.

40. The importance of training staff to assist disabled passengers properly was a major element in the success of the arrangements. We cannot emphasise too strongly or too often the need for fully-trained staff at all levels to effectively assist disabled passengers when planning their travel arrangements and throughout their journey.

APPENDIX 1

Best Practice Guidelines from APRS research

As a result of the research which Passenger Focus had undertaken, we proposed the following measures, many of which have been incorporated into the Passenger Assistance system:

Basic functions which the rail industry should undertake

- Fulfil DPPP requirements to train staff in disability assistance, disability equality, use of equipment and clear communication.
- Ensure that NRE gives callers an appropriate number on which to book assistance.
- Monitor the quality of assistance and highlight both good practice as well as shortcomings.
- Consider a freephone number for passengers to book assistance, if not already provided, in line with best practice.
- Provide practical means for staff to share and update station/train facility information between rail service companies.
- Review how the existing booking system can be improved.
- Ensure that any new assistance-booking equipment can create a database of passenger details to accelerate frequent bookings by the same passenger, especially for identical journeys.
- Enable passengers to request assistance and receive confirmation online.
- Ensure any new system can retrieve full journey details from the reference number.
- Provide APRS staff with the means to contact station staff immediately (e.g. in case of journey disruption).
- Share good practice to help in locating 'missing' passengers. Comparison with previous experience.
- Refund the passenger's (and any companion's) fare in full in the case of assistance failure which disrupts or delays their journey.
- Ensure that on-train staff receive booking details, especially in case of:
 - unstaffed stations or
 - trains without reservable accommodation.

APRS Booking staff duties

- Ensure that staff are fully trained: to handle calls effectively; to be familiar with existing systems; and to provide accurate information about facilities at stations and on trains, especially regarding their accessibility.

- Familiarise themselves with how to access other train operators' information about train layout and on-board facilities.
- Quickly ascertain the level of information which passengers need – frequent users will require far less detail as a rule than first-time/infrequent travellers.
- Provide information to passengers on how to alert staff of their arrival at the starting station.
- Ensure that passengers understand when on-train accommodation had been booked in addition to assistance.
- Ensure that passengers understand whether station or on-train staff will assist.
- Provide a booking reference and any other relevant detail for booking retrieval by staff and for passenger confidence.
- Advise passengers of whom to contact and how if assistance is not provided.
- Improve communication between APRS and train/station staff to ensure booking details are available to them.
- Call back at least a percentage of passengers for their feedback after the journey within 48 hours.

Assistance by station or on-train staff

- Staff should be trained to recognise passengers with 'invisible disabilities' and assist them appropriately.
- Check with each passenger the type and level of assistance required.
- Ensure that ramps for boarding/alighting are deployed in accordance with the regulated process.
- Contact the alighting station to confirm that the (named) passenger is travelling and his/her location aboard the train.
- Provide assistance with luggage.
- Assist disabled passengers to the reserved seat/wheelchair space; where not reserved, find them suitable accommodation.
- On-train staff to identify themselves to disabled passengers and ascertain their needs.
- Staff must assist disabled passengers to a point where they can board their onward train or continue their journey by other means.
- Staff to remain alert to disabled passengers' needs, e.g. in the event of disruption, last-minute change of departure platform or train delays once underway.
- On-train staff to be alert to disabled passengers' destinations and to provide assistance should station staff fail to do so.