

# Response to the Office of Rail and Road's November 2017 consultation on improving assisted travel

January 2018



## Introduction

Transport Focus is the independent consumer watchdog for Britain's rail, bus, coach and tram (outside London) passengers in England; and for users of England's motorways and major 'A' roads (the Strategic Road Network). We aim to make a difference in various ways, but always with the user at the heart of our work.

We aim to give all transport users as powerful a voice, as well as those that provide their services. We do this by gathering evidence of the user experience and presenting it to those who can make a difference, whether from the industry or government. We undertake the National Rail Passenger Survey ([NRPS](#)), the Bus Passenger Survey ([BPS](#)) and the Tram Passenger Survey ([TPS](#)) and have used the results of these to drill down further for additional information on disabled passengers' views. We undertake other research and our response is based on the evidence gathered over a number of years, and other direct feedback from users, including our postbag, and from our own experience of using the railway. The compiler of this response has impaired mobility and is a frequent user of the assistance system and thus has first-hand practical experience of many facets of the system.

We welcome the opportunity to respond to this Office of Rail and Road (ORR) consultation. We believe that despite infrastructure and on-train facility improvements over the last two decades, the level of the assistance provision service has failed to register such a significant improvement over the same period. Transport Focus's predecessor bodies undertook a series of mystery shop surveys over a number of years to assess the efficiency of passenger assistance. We have noted some improvements during the course of these, but it seems from ORR's own research that several aspects of assistance need significant improvement. We trust that the outcome of this consultation will contribute to resolving such issues.

Transport Focus, and its predecessors, has a role in reviewing each operator's proposed Disabled People's Protection Policy (DPPP) and in reporting its views on the conformity of the document to ORR.

We work with the Department for Transport in various areas concerning accessibility matters, including the content of new franchise awards.

We also run an Accessibility Forum twice a year which brings together the rail and bus industries, road user organisations and disability representative bodies and individuals to consider matters of mutual interest in the transport sphere.

## Responses to the consultation questions

### 1. How can rail operators improve the availability and promotion of Assisted Travel information at stations?

Poster sites at prominent points on stations and other areas of railway property would no doubt be the most helpful areas to exploit, though demand for such positions for other publicity needs for various types of passenger information (engineering work timetable changes, Railcard promotions etc.) means that such spaces can be at a premium. Racked leaflets, distinct from the DPPP, may be another option. Announcements are probably not a helpful means as this medium is already heavily used for train information, security warnings, and disruption details for example. CIS information screens (though not those used for departure information) might also be exploited for this purpose. At stations, staff could actively offer a leaflet to likely beneficiaries when they are seen on the station or when renewing a Senior Railcard for instance.

It seems that too little advantage is taken of other methods to advise passengers before they reach the station. Details could be sent with new issues of Disabled Persons Railcards or with postal issues of Senior Railcards. More imaginative use could be made of the Railcards websites and operators' own websites could brand assistance in a more prominent and uniform manner.

#### **Social media offers another immediate outlet**

The extent to which the industry has sought to engage with disability representative organisations in the past is unclear. Working alongside them may enable details to be included in those organisations' newsletters and other publications and on their websites. Partnering with these organisations provides a real opportunity to widen awareness of assisted travel.

### 2. Are there any reasons why passenger-facing documents should not be required to achieve the Crystal Mark?

It would be a major benefit if all such documents *did* achieve the Crystal Mark. However, rendering them into Plain English (and Plain Welsh, where appropriate) must not obscure the meaning of any specific terms relating to assistance schemes. Particular care must be given to ensuring that jargon can be overcome but that the intended meaning remains clear. It will also serve to ensure that train companies' policies are made much more obvious to readers, which is not always the case at present.

Such rendition needs to be made before drafts are submitted to ORR and beyond for comment. However, allowing for the possibility of misinterpretation,

any changes would need to be 'translated' and referred back for checking for accuracy.

### **3. What steps can be taken to increase website accessibility?**

Transport Focus is not best placed to comment on how this might be achieved. Initially, however, advice from users on their needs must be obtained.

The current DPPP Guidance sets a minimum level of accessibility. The rapid advancement of technology requires the Guidance to be as up to date as possible with realistic targets for operators to achieve.

Clarity is vital if passengers are not to be confused, especially where bookings are concerned. Display of fares information varies from one operator's website to another and can be misleading. Not all websites it seems use the same algorithms and thus different fares for identical journeys can be generated by some systems, which is a source of nuisance and incomprehension for all passengers, not only those with a disability.

Whichever format is adopted, it is important that the website can reproduce its contents in speech by conventional reading machines for visually-impaired people.

The Guidance currently specifies a certain level of website accessibility, especially for those with visual impairment. It is probable that this needs revision to match current standards.

### **4. How can rail operators use social media to increase awareness of Assisted Travel?**

Many passengers 'follow' one operator or more on Twitter as it gives them access to live information on disruption. A more concerted effort to promote awareness of Assisted Travel with periodic tweets such as 'Did you know that you can book travel assistance for yourself or someone you know who needs it? Follow this link for details...' is appropriate.

A similar campaign could exist on other social media, for example Facebook. Hopefully, even if those who could make use of Assisted Travel do not see these messages on social media, friends or family may, which in turn would raise general awareness.

On a related issue, we suggest that an addition be made to the National Rail app for Assisted Travel, so that a passenger seeking to make a journey could

find a link to the correct Assisted Travel contact information for the appropriate operator(s) and/or a brief explanation of what is available.

**5. Are there any obstacles to providing Assisted Travel information no more than “one click” from rail operators’ website home pages?**

The greatest obstacle it seems is persuading operators that it would be helpful if they would indicate access to assistance details in the same place on all websites, and that the layout is capable of ensuring that accessibility details for that operator can be reached by a single click. Desk research undertaken on 4 December 2017 established that all train operators’ websites (franchises, Merseyrail, TfL, London Overground) are all reachable in at least two clicks except for two (both franchisees) which require three clicks.

If operators can ensure that ticket purchase pages can be reached by only one click, the technology must be identical to reach the assistance pages. Perhaps if ticket sales and assistance booking can be co-ordinated, as discussed elsewhere in this paper, the problem is largely resolved, although not all those booking assistance need to buy a ticket.

In a number of cases, though, the ‘one click away’ problem is not the only issue which needs resolving. Regardless of the number of clicks involved, it is important that operators make clear where to click to reach the access details and assistance-booking service. The introduction of a clear (and uncontroversial) logo for assistance details might help. Currently clarity is hindered by the range of different titles used by operators and behind which assistance details are available: ‘Journeycare’, ‘Assisted Travel’, ‘Help & Contact’, ‘The Experience’. Perhaps ORR/Rail Delivery Group (RDG) could recommend, or even insist upon, a single term to indicate where details about accessibility and assistance can be found and a single location on the homepage where the suitably evident button to reach it is placed.

In a related matter, some of the online assistance booking pages are less helpful and easier to use than others. The fact that companies have adopted their own layout and order adds to the confusion to passengers familiar with other operators’ sites. We accept that not all operators offer the same facilities, but the booking procedure is common to all. Again, perhaps ORR/RDG could investigate/suggest a standardised version which all operators might offer – though some would need to omit certain elements which are not relevant to their services. Many operators’ website forms are poorly arranged for journeys that do not involve just one train by a single operator but where a change of train is necessary.

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

Transport Focus believes that ticket-buying could well be linked to assistance booking to ensure that the passenger gets the best deal with the least effort, especially where Advance tickets are concerned. It is relatively simple to arrange assistance separately if an ambulant passenger has bought an Advance ticket – though it means another often long-winded transaction. In the case of a wheelchair user, however, the wheelchair space(s) on the chosen train may already be allocated so the problem of trying to amend an Advance booking is complicated. This, in theory, requires the payment of a fee in addition to any difference in fare if dearer than that already bought. Most passengers would prefer only one transaction in any case.

If a train company already maintains its own telesales facility and ticket website it is difficult to see the barriers that would prevent this ‘one-stop shop’ facility from being implemented. For ease, it would appear that bringing the retail facility to the assistance-booking side would solve the problem most simply.

Bringing together ticket retailing and assistance booking should make it easier for staff and passengers to ensure that the most suitable ticket is issued for the journey. It will, however, require a major training programme to be undertaken for retailing staff if all are to be able to handle such transactions accurately and professionally; total knowledge of accessibility needs and service provision is necessary. It would be a retrograde step, however, if passengers experience extended waits solely to book assistance if this option is adopted.

More complicated would be the linking of third-party sales outlets with assistance bookings. This is covered under Question 7.

It is not the intention, we trust, to *require* that tickets be bought as part of every assistance booking.

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

An overall arrangement with RDG, perhaps as part of their licensing requirement, rather than ad hoc arrangements with individual train companies, is the most constructive way forward and ensures a standard approach.

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

This is principally an area to which only operators and RDG can respond.

As third-party organisations require a licence issued by RDG to enter the ticket-retailing trade, scope exists within the wording of those contracts to ensure productive engagement.

There is value in third-party websites having similar one-click layout/access as mentioned in Q5 above.

Transport Focus views this as a crucial matter to ensure that disabled passengers' needs are met.

## **9. How might the reliability of communication be improved?**

Many different lines of communication are involved in a journey using assisted travel and each is a vital link in ensuring successful delivery of that assistance. The reliability of each stage has to be assured for the system to function properly.

At least three directions of communication are involved here:

- passenger with the operator when making a booking
- company to itself and/or to another company
- company back to passenger when booked arrangements have altered, due to service revision/breakdown for example.

The last of these three, where the passenger encounters an unforeseen hurdle during the journey, is the one which appears the least observed and the one which can have a profound effect on the success of the journey.

Not all links in this chain are immediately consecutive:

- (a) ensure that the details in DPPP's, on websites etc. relating to assistance provision and booking arrangements are clearly understandable and easily available to all who may need them
- (b) the physical ability of the passenger to telephone or complete online forms to book the exact assistance that they need
- (c) for booking staff to record this accurately
- (d) for the details of the booked assistance to be confirmed and sent to the passengers by text, email, post etc.
- (e) for this information to be passed to staff at the staffed stations involved
- (f) for the correct information to be taken by staff at the starting station and supplied to staff meeting the passenger at the destination station
- (g) repeat (f) for every change of train
- (h) call the passenger if subsequent changes to the train services vitiate any part of the assistance already booked
- (i) contact the passenger after the journey for feedback.

It was our understanding at the time that Passenger Assist was introduced that all front-line assistance staff would be issued with hand-held devices for instant communication. It seems that this has not necessarily evolved in this way. In many cases, staff are still reliant on the telephone or on printed sheets produced much earlier in the day and which fail to carry details of later bookings.

It would be helpful if ORR could ascertain that all operators employ a means of instant check-back when assistance has failed, to investigate where the chain of communication broke down as quickly as possible. Staff at stations where booked passengers alight often claim not to have received the message despite the passenger being present when the staff at the boarding station made the call. This often appears to be more complex where multiple operators are involved in a journey. Seamless inter-operator communication is vital as is contacting passengers to rearrange assistance when disruption occurs.

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

It was our understanding that Passenger Assist is provided in largely the same way across the entire rail industry, regardless of train and station operator, within the limits set out in each operator's DPPP. It is unclear what additional 'protocol' is envisaged.

Improvements which we should recommend include:

- RDG and individual operators need to impress upon on-train staff the need to move about the entire train to make themselves known to disabled passengers and assist as the DPPP promises that they will
- on-train staff should have details of disabled passengers with booked assistance on that service and the accommodation reserved for them, where appropriate
- on-train staff should also confirm with the alighting station the passengers' location aboard the train and be on hand to assist with alighting if necessary (on too many journeys, especially on intercity routes, members of staff rarely appear in standard-class passenger saloons).

RDG and Network Rail will be required to work together in this leadership role, given the increasing numbers of passengers at Network Rail stations requiring assistance.



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

We welcome the fact that some train operators already do so and thus best practice has already been established. It seems that other operators should follow suit.

Our experience is that passengers prefer a smooth and uneventful journey as opposed to receiving compensation, but where failures occur, this needs to be compensated for. Where assistance failures delay passengers they should qualify not only for Delay Repay but also ticket refunds. It is much more difficult to establish a fixed regime of entitlement in the case of assistance failure compared with clear-cut delay compensation as assistance failure will affect passengers differently. While perhaps a minimum level should apply, a good deal of flexibility should also apply to ensure that any more serious failures are compensated for appropriately. Any scheme must balance the level of assistance failure and it should always be possible for ex-gratia payments for serious cases.

In saying this we are mindful that consumer protection regulation does give passengers 'rights' in this area. If services are not provided with due care and skill and if a passenger has based his decision to travel on information provided (such as the provision of assistance), then failure to deliver could open the operator up to a claim for redress. There is value in the industry pre-empting the need to bring a civil action by providing an industry-wide scheme of its own.

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

Currently redress policy is dealt with by each train company individually, with a varied result: some offer it for assistance failure, whether other delay occurs or not, while the remainder does not. As a result, some passengers benefit far more than others and some have no redress at all for identical incidents. We feel that this is unacceptable, given the lengths to which passengers have gone to in order to advise operators of their journey plans. Given that Delay Repay has largely been standardised now, following its disintegration from the standardised BR norm, passengers find it bewildering that operator X can provide nothing at all when booked assistance fails whereas operator Y gives up to a full refund.

It would be counterproductive to some passengers to thwart potentially better provision by some more progressive organisations were a rigid system imposed. The creation of a basis of minimum standards would at least guarantee a certain level of payment, as in the case of Delay Repay.

It may be that RDG/DfT/ORR will need to negotiate terms with train and rail-service companies to ensure standardisation. Any such scheme will have to include **all** operators. Network Rail will need to feature prominently as a participant in this scheme given the very high number of journeys to, from and via its stations (although we accept that train-company staff undertake assistance duties at some of them).

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

All operators' training needs to concentrate on several major aspects:

- assisting passengers with hidden disabilities and ensuring that staff recognise such conditions, especially those with cognitive impairment
- ensuring that organisations representing disabled people feature in the training which staff receive
- special attention to be given to those members of staff who deal with passengers face-to-face or by telephone.

It is important for all operators to ensure that not only induction courses are provided, but also refresher training at frequent intervals.

The only organisation with cross-industry reference in this matter is ORR so it would fall to ORR to specify minimum standards and frequencies which could then be reflected in franchise specifications issued by the relevant authorities. Special notice needs to be taken of the detail submitted by operators in their annual returns of training. Reporting obligations will almost certainly require revision following this consultation.

### **14. How frequently should disabilities training take place and its content be refreshed?**

All new entrants should receive the level of training suitable for that role upon joining the company and at frequent intervals thereafter, especially if their roles change. It seems to us that at least an annual review is necessary, although this may take place after a shorter interval if it appears that staff members are unaware of certain aspects of their role or where significant change in procedure will take place. Training content should be kept under constant review, so as to reflect amendments to company policy, changes to achieve best practice, other amendments due to revised legislation etc.

Best practice ensures that all staff receive some accessibility-awareness training, relevant to their role. Staff dealing with passengers (face-to-face, over the telephone, and in writing for example) will require considerably higher levels of skills. Stations staff will require specific training in access matters.

**15. Should adherence to the Disabled Persons Transport Advisory Committee (DPTAC) training framework become a mandatory element of the DPPP guidance?**

It seems sensible for the DPTAC training framework to play a major role here. Whether mandatory or simply recommended is perhaps a matter for ORR to decide. If it were made mandatory, the framework would need constant review to ensure that it remains valid, in line with our response to Q14. If mandatory, checking each operator's performance would be simplified. We welcome the recent consultation by DfT in which the framework was promoted and also the recognition that it may need updating.

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

It may be difficult to verify the quality of training if operators have differing courses. The wider the divergence the harder it becomes to compare. Some companies, it seems to us, offer better assistance than others which begs the question as to the cause: better training or more motivated and appropriate staff? It would be unfortunate to impose a standard type of training if this would reduce the level of excellence in some companies' training programme. Transport Focus is not in a position to know whether ORR could cover this task within existing resources or if additional recruitment would be called for. We would have no objection to ORR undertaking this role if it could do so adequately.

What would be the means of verifying? If based on the outputs achieved, it seems that this would offer a reasonable means for ranking performance. Output is the important goal. Those whose rankings were lower might then investigate how the better-performing companies' training programme differs from theirs. An element of management is also involved here. Effective management must be in place to ensure that staff behave as required.

Perhaps the most important source of verification comes from passengers themselves. A programme of 'call-backs' whereby users of the assistance service are asked to rate the experience will provide direct feedback.

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

Not applicable

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

It seems to us that frequent mystery-shop surveys are the best means to quickly see current delivery. ORR could seek to obtain details from operators' own such surveys or commission their own spot checks. Variance between methods of individual operators' own surveys may result in an imbalanced result, however, if an overall view were sought. This can be an expensive option. Perhaps a panel of disabled passengers, representing the widest possible range of disabilities and geographic spread, could be recruited for several years' service at a time; members could report on the effectiveness of the assistance on their journeys.

Again we would recommend the use of surveys amongst users of the assistance service, see Q16.

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

Not applicable

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

Transport Focus agrees that certain aspects of the current guidance, though valuable as a means of defining minimum requirements, are now out of date and require considerable revision. While it was very useful at the time of its inception, it has since then failed to keep pace with technological or legislative changes and with industry best practice. A review is overdue.

Inclusion of industry best practice will be useful in seeking to raise the standard of all DPPPs. It is important that a revised Guidance is in place to ensure that, at the very least, minimum DPPP standards are maintained, though we expect operators to seek to emulate best practice where possible.

We do not disagree with any of the individual bullet points in the document but enquire whether this is to be a wholly ORR-internal exercise. The original guidance document was drawn up on the basis of a panel of representatives from a variety of organisations; we agree that updating should involve a wide

range of stakeholders as stated in the consultation and suggest for instance DfT, DPTAC, RDG, several TOCs, Network Rail, Transport Focus, London TravelWatch and perhaps several disability-representative bodies. This will be especially important if aspects such as payment of compensation for poor or absent assistance or amendment to training regimes are included.

For the future it seems more sensible for the guidance to be kept as an electronic document.

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

We should be concerned if standards were allowed to slip in any way. Inclusion of best-practice examples in the revised Guidance will emphasise the need for operators to seek a high level of facility.

It is unnecessarily bureaucratic for operators to submit DPPP documents for annual review when no substantive amendment has been made. It will suffice for a standard confirmation that no substantive changes have been made to the DPPP if this is the case. It would, though, be disappointing if too many operators continually failed to offer any new features.

Perhaps some undertaking should be given for DPPPs to be reviewed independently midway through a franchise or after five years, for instance. Some significant improvement might reasonably be contemplated in most DPPPs during such a timescale.

## **Additional comments**

There are a number of additional points which we should like to make, which affect the delivery of assistance but which are not covered in the questions in the consultation.

### **Railhead stations during planned engineering works – road replacement interchange**

Operating reasons may indicate a particular station as the intermodal transfer point for passengers, but where this involves an inaccessible station or one where access is awkward, special consideration needs to be given to the additional difficulties which this will impose on disabled passengers and on the staff who must assist them. Wherever possible, no interchange point should be inaccessible.

Examples have occurred where the station operator at such a railhead is not the operator of the trains which are affected. In these cases it has occurred that staffing levels have not been increased to deal with the additional demands and/or that road replacement services do not serve the station itself.

Recent examples of this include:

- West Croydon (managed by London Overground) but when GTR Southern services to Sutton and beyond are replaced by buses: the bus stop is several hundred yards from the station, some distance across the town centre, which means that connection times for passengers with mobility/fatigue issues for example cannot be maintained. No guidance along the unfamiliar route is provided, even for visually-impaired passengers. The station operator would not provide taxis for those who could not walk that distance and who would have missed the connecting service in any case if they had, as it argued that the train-operating company was responsible; station staff would not contact the other operator but expected passengers to do so for themselves.
- Selhurst (with a steep and noncompliant ramp to one platform and steps to the other three) is frequently used as the interchange point between train and bus. It seems that Selhurst will gain step-free access in the next few years.
- Barnes was selected as the inter-modal transfer point when the route via Richmond was closed. Only one platform has step-free access. Buses were stopping on the overbridge, requiring the use of yet another flight of stairs or a long detour via the narrow road to the station and then up (or down) the slope of the bridge. On this occasion, taxis were provided from Putney for those unable to use the stairs but the traffic conditions outside

that station require a walk of several hundred yards, negotiating a major road junction (with pelican crossings), to the nearest point where taxis can pick up.

We accept that at times of unplanned engineering works this type of imperfect intermodal interchange arrangement may be unavoidable.

### **Exceptional/occasional use of inaccessible platforms**

The island platform on the fast line at Balham, for instance, can be reached only by stairs; a lift was installed only on the relief-line island platform. When trains are routed on the fast line the station becomes inaccessible, yet staff at other stations are usually unaware of this and are reluctant to arrange alternative transport even if this change of access is brought to their attention. In similar circumstances, trains can call at platforms which are not usually served and much greater distances stepping down from or up into the train are experienced than on the relief-line platforms. These distances are beyond the ability of some people, yet no warning is given and so no assistance is sought despite it in reality being needed.

Train operators need to consider the effects on disabled passengers of rerouting trains from the usual platform to little-used platforms, which have fewer or no suitable facilities. Station diagrams on the *Stations Made Easy* database often ignore the occasional use of such platforms and mark them typically as 'not in use', so unsuspecting passengers can be easily caught out. Often attention is not drawn to the fact that a different (inaccessible) platform is to be used, especially if the passenger is unfamiliar with the journey and with the layout of specific stations.

Passenger facilities on such platforms, such as weatherproof waiting accommodation, compliant seating, step-free access for example, are incidentally often meagre or wholly absent, making it a highly unattractive environment.

### **Up to five minutes' wait at terminating stations for assistance to alight**

It has been a feature of DPPPs for some years that at stations where a train terminates, it is acceptable for passengers to have to wait up to five minutes for staff to arrive to provide assistance. Section C2 (e) of the Guidance allows this. It has never been clear to us why this should be the case. At intermediate stations assistance to alight has to be provided as soon as the train stops to avoid delays. Transport Focus would like to see this proviso removed from the new-style DPPP Guidance if its retention cannot be absolutely justified.

Most London termini have no seats on the platforms where arriving passengers can await assistance and the rapid turn-round times of suburban trains means that waiting for assistance aboard the train is fraught with the danger that the train may depart before the assistance appears.

### **Use of agency staff**

We accept that the presence of agency staff at some stations may be better than no staff at all, but many claim to be untrained in deploying ramps or assisting disabled passengers and thus the accessibility of the station is wholly compromised. As a result, booked assistance effectively fails and no warning is given to the passenger concerned until the last moment – by which time it may be too late. Where assistance has been booked it is unacceptable that no one qualified to provide it is on hand. We urge ORR to seek clear details from operators on the use of agency staff and the ill effects which this has on assistance provision.

### **Attempts to contact staff when assistance fails**

The information provided in a number of DPPPs as to the steps to take when assistance fails to materialise seems to be inaccurate. Where staff do not turn up to provide booked assistance, it has proven impossible to resolve the situation by using either the help point (if provided) at the station or by telephoning the assistance line of the train company who made the booking or provides the service. This leaves the passenger stranded. The person answering the help point often claims to have no telephone numbers to contact the relevant station; the assistance line equally seems to have no telephone numbers to hand. In many cases it takes a long time to reach the assistance service by phone, especially later in the evening. Once the assistance service has closed only the help points remain but on many platforms at Network Rail stations there is no help point and often no staff are visible, even to those who have sight. When travelling alone, a disabled passenger is even more vulnerable in such a situation.

This situation is exacerbated when the train company providing the service does not provide assistance staff at the station (e.g. at many London termini). Help points need to be able to arrange immediate replacement assistance as should assistance-booking lines



### **Absence of station staff to confirm boarding**

Following on from the point above, the system requires staff at the boarding station to contact the alighting point to confirm the booked passenger's presence and location aboard the train. At those stations without staff this role has to be assumed by on-board staff, but on those trains where staff are absent or fail to appear in passenger accommodation, this confirmation cannot be made and the booked assistance will probably not be provided. It is therefore vital to have a fall-back position on which passengers can rely to advise the alighting point that they are in fact travelling. The help points and journey-booking lines, as already mentioned, are generally reluctant and/or apparently ill-equipped to carry out this function.

ORR might want to seek clarification from each operator as to how this matter is dealt with currently and whether a best-practice method emerges. If not, ORR/RDG may need to create such a means of contact. The same means could be used for emergency assistance, such as when a passenger has been over carried when assistance to alight has failed or a passenger is stranded on a platform.

Our own research and ORR's more recent research still shows that retrieving passengers from trains remains one of the hardest areas to resolve satisfactorily. Some further research with train companies may well pay dividends.

The matter becomes all the more complicated where the train operator and station-managing company differ. It would be more helpful for the passenger if the fall-back position were identical, regardless of operator.

### **'Double booking' at some stations**

At smaller stations where only one member of staff is available, booking systems allow a passenger to be booked to alight on one platform at the same time that another passenger needs to board another train at a different platform. Where only a single member of staff is available this can result in one of the booked passengers being disappointed or the train delayed, if on-train staff cannot step in. At some stations trains call frequently or departures and arrivals in each direction are close together; is it possible for the booking system to recognise when a booking has been made already at a particular time at a certain station so that at least the passenger can be warned or advised to revise his travel plans? Do operators have their own internal guidelines as to how to handle these situations?

### **Exceptional staffing of otherwise unmanned stations**

In some DPPPs, operators provide staff at otherwise unstaffed stations under certain circumstances, although this detail is rarely clear as to the likelihood of staff provision. ORR may find it enlightening to investigate how often and in which circumstances those companies which supposedly offer such a service actually provide staff at stations. The alternative is to provide a taxi; it is unclear how much training in dealing with people with disabilities taxi drivers in various parts of the country have had and in such circumstances it is the taxi driver who is acting as proxy for the train company, all of whose public-facing staff should have had suitable training.

### **Access to booking services on 26 December**

Many operators shun the provision of assistance-booking telephone lines on 26 December, despite trains running on 27 December and the need to enable assistance booking with no more than 24 hours' notice. In many cases they refer callers to the assistance lines of other operators who are open on that day. It is unclear how much additional strain this places on those operators, whose passengers are thus inconvenienced by having other companies' passengers transferred to them. It seems sensible to ensure that where one owning company has several franchises, at least one of those companies' assistance-booking services should be available on 26 December and that passengers are transferred at no extra cost on that day.

In other cases it is unclear why certain operators are permitted to avoid providing this basic service. It appears that there is no safeguard to prevent all operators from withdrawing the service on 26 December.

### **Access to static on-train refreshment outlets**

Some DPPPs offer those passengers who cannot easily reach the buffet counter the opportunity to request assistance from on-train staff. It would be helpful if this facility were extended to other services. To that end, inclusion in the Guidance would be a bonus.

### **Absence of staff on station forecourts when bus replacement services operate**

Too often no members of staff are available to passengers (disabled or not) at the point of interchange with road vehicles. The revised Guidance needs to be quite clear about expectations in this regard. It seems to us that the DPPP's intention is that staff should be available to assist disabled passengers to/from buses or taxis on the forecourt, assisting with luggage as necessary.

### **Waiting times to be connected to telephone assistance helplines**

Anecdotal evidence and personal experience, it appears, confirm the belief that answering times in general have lengthened over the last few years. In the case of emergencies, such as assistance failure, it is more important than ever to have much quicker access to assistance staff.

### **Accuracy of knowledgebase and other accessibility information sources**

Information on the *Stations Made Easy* pages is often inaccurate; on occasions the diagrams and photographs are contradicted by the text. In other cases station descriptions on operators' websites are at odds with this information. The information regarding station accessibility, for instance, in DPPPs may be different. We should welcome ORR's efforts in ensuring that all such information is rechecked by people qualified to do so and with good knowledge of the system to ensure accuracy. Passengers and assistance staff have to rely on these sometimes inaccurate or contradictory details to give information and book journeys.

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