

Response to the Department for Transport's Accessibility Action Plan Consultation

November 2017

Introduction

Transport Focus is the independent consumer watchdog for Britain's rail passengers, for bus, coach and tram passengers in England (outside London) 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 strive to give all transport users as powerful a voice as those that provide their services. We do this through 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), (<https://www.transportfocus.org.uk/research-publications/research/national-passenger-survey-introduction/>), the Bus Passenger Survey (BPS) (<https://www.transportfocus.org.uk/research-publications/research/bus-passenger-survey/>) and the Tram Passenger Survey (TPS) (<https://www.transportfocus.org.uk/research-publications/research/tram-passenger-survey/>) and have used the results of these to drill down further for additional information on disabled passengers' views. We undertake other research which has helped inform our views, as has our postbag.

We welcome the opportunity to respond to this DfT consultation. Our responses are based on the evidence gathered over a number of years, through research and other direct feedback from users and from our own experience of using the public transport system.

We are somewhat surprised that the consultation makes no reference to the roads network. Many disabled people cannot (or prefer not to) use public transport and are reliant on their cars, which can provide not only door-to-door journeys but also inter-modal travel, to reach rail stations or airport, for instance. Transport Focus is initiating research into this sphere; this research project constitutes a wider commitment in this year's Work Plan to focus on the needs of transport users with a cognitive or physical disability. Our aim is to understand the experiences of disabled motorists and to represent their interest. Disabled drivers form some 5% of the driving population (2 million).

We will consider:

- Willingness to use the Strategic Road Network (SRN)

- Confidence when using it
- Wish/need to travel with a companion
- Journey time and management of delays
- Planning
- Roadside services/facilities
- Breakdowns
- Traffic information
- Road-sign clarity and siting
- Usability of service stations

Research is due to begin in November, lasting until February. Publication is scheduled for April, with a launch in May.

Responses to the Consultation's Questions and Actions

For ease of reference, our responses follow the Action and Question order of the original document. We have limited our responses to those areas over which we have a remit.

Action 4: We will work with disabled people, the bus industry and the devolved administrations, on the Regulations and guidance which will implement the Accessible Information Requirement on local bus services throughout Great Britain, helping disabled passengers to travel by bus with confidence.

Transport Focus welcomes this work and agrees with the action proposed, which will make bus travel more straightforward for visually-impaired passengers and for everyone unfamiliar with the route or area. For the future, better means of recognising approaching buses at stops, especially where the stop is served by more than one route, would be a major improvement as would fully-accessible (i.e. audio and visual) real-time arrival information at principal bus stops.

This presupposes that passengers can actually board the bus at the stop. Many factors may preclude this: ease of access reaching the stop; whether it is on a pavement or preferably has a raised Kassel kerb; whether local car-parking arrangements enable the bus to pull against the kerb; whether it has a seat or shelter and so on. A quarter of England's surveyed bus passengers last year were dissatisfied with bus stop accessibility. Much improvement has been made in railway accessibility in recent years but the provision of even basic amenities, such as an up-to-date timetable or indication of the services due to call there, is often lacking at bus stops.

Consultation Question 1:

How well do you feel the national bus concession in England succeeds in supporting the local transport needs of disabled people, and how might it be improved? Please be as specific as possible in your response

The national bus concession is a valuable means of enabling older and disabled people to travel. It allows passholders access to key services and promotes social inclusion and independent living as well as reducing reliance on car use. It has several limitations:

In many areas, especially rural but increasingly so in urban areas, the continuing reduction in bus services is severely eroding the value of the concessionary ticket and reducing passholders' ability to travel. In many places, no bus service is provided at all, so the concession has no benefit. We welcome the initiative in some areas to enable concession pass holders to use rail services. Where no practicable bus service is provided, the concession should be available on schemes such as community transport.

In many areas time restrictions apply in the morning which can cause a surge in demand on the first permitted services. In some areas a ban on use later at night is also in force, at a time when services are generally less busy. Disabled people are just as disabled either side of these time bands; older people are just as old. The time restriction denies them the benefit of attending early-morning health appointments, for instance. A review of the necessity for such time limits would be welcomed.

Not all local authorities interpret the eligibility criteria identically, with the result that some people are denied in one area what they would receive in another. It is unclear why such diverse interpretation persists. We are keen that those who qualify in one area should do so elsewhere, but we are concerned lest current beneficiaries should lose out if national standards were imposed.

We welcome the facility in some areas where features such as including carers'/companion travel at no extra cost is provided, though these are often bus companies' own initiatives.

Action 6: *We will seek to increase the number of accessible vehicles through appropriate recommendations to taxi and PHV licensing authorities in our draft revised best practice guidance.*

Transport Focus has no remit to consider taxi and public hire vehicle issues. However, the availability of such vehicles has a major impact on disabled passengers at times of service disruption on the railway, when alternative accessible transport is sought. It is equally important for passengers who are unable to use specific stations and who need alternative transport to or from an accessible railhead; in most cases, taxis or private-hire vehicles are used.

In instances where a passenger needs to remain in a wheelchair for the journey, a fully accessible vehicle is required. In many parts of the country such vehicles currently are scarce.

An increasing number of bus companies also arranges taxis for wheelchair users who cannot be accommodated aboard their vehicles, so that market too will benefit. We welcome this action.

Action 8: *We will continue to roll out station access improvements for which funding has been allocated and deliver the Access for All programme in full, building on the significant progress that the programme has already made. We will continue to seek to extend the Access for All programme further in the future.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

Transport Focus recognises the transformation in accessibility at many stations over the last decade. This has made the railway much more accessible not only for disabled and older passengers but also has made rail travel much more attractive for other passengers too, such as those with luggage or small children. The Access for All programme should indeed be delivered in full. Whilst most major stations have seen improvements, there remains a large number of other stations where improvements would be of immense benefit. We are concerned that the future of further accessibility programmes is uncertain: the use of *continue to seek to extend* does not instil confidence that the programme will be maintained.

We appreciate that funding will never be sufficient to make all stations accessible but concentration must be kept up to ensure a reasonable geographic spread of accessible stations across the country. It is vital to ensure that when accessibility features have been installed (such as lifts, universal toilet cubicles or ramped access to waiting rooms) that these are available at all times when trains call. Too often accessibility still relies on a staff presence; reductions in staff at stations must not reduce their accessibility. We welcome the apparent recognition of more recent franchisees from the wording of their Disabled People's Protection Policies, that staffing is seen as an important element in accessibility matters – only properly trained staff can provide the correct assistance.

Consultation Questions 2 and 3: [re. air travel]

Transport Focus's remit does not extend to air travel and for that reason we cannot respond to the set questions.

We would stress, however, the importance of ensuring seamless transfer of disabled passengers between rail and air services at interchange points served directly by rail. Feedback from various channels suggests that such transfers of responsibility generally work well at airports such as Gatwick, Birmingham International, Manchester International and Heathrow.

Airports are also served by the strategic road network and suitable interchange facilities, with assistance where required, for disabled motorists must be maintained.

Action 9: *Subject to the finalisation of the Statement of Funds Available (in October this year), Government will allocate funding to provide additional accessible toilet facilities at stations as part of the next rail funding period (from 2019 onwards).*

We trust that adequate funding will be forthcoming. Ensuring accessible toilets at stations is vital for many passengers, especially as many trains do not have toilets aboard them or their availability cannot be guaranteed. At many larger stations, standard toilets can be accessed only by stairs, so the introduction of more accessible toilets with step-free access will be a major improvement.

We recommend that future accessible toilets should be unisex cubicles. Locating accessible cubicles within gender-specific toilets prevents a spouse or carer of the opposite sex from entering it to assist. Also, where possible, baby-changing facilities should be located elsewhere so that the toilet is likely to be available to those who need for its principal purpose.

Consideration needs also to be given to lone passengers with luggage, or children or a pram, who need to use toilets. If these items cannot be stored safely elsewhere on the station, provision has to be made for toilets to be usable with them.

It would be welcome to see more Changing Place toilets added to more stations on the network. It is disappointing not to see specific mention of this within the document.

Action 10: *From October 2017, DfT will fund a pilot to explore opportunities to improve train tanking facilities and increase the availability of train toilets. Building on the learning from this and industry-led research in this area, we will consider how best to allocate further investment, beginning with upcoming franchising opportunities.*

Transport Focus welcomes any proposal that can extend the usage time of on-train toilets. Especially in areas where station toilets are not provided or are not open at all times when trains call, on-train toilets become more important still. It is vital to ensure that toilet tanks are emptied when they should be to prevent the cubicles locking themselves out of use when retention-tank capacity has been reached. This is of great importance to those passengers reliant on accessible toilets who have no means of seeking an alternative cubicle (if provided) elsewhere on the train.

In addition, we welcome the industry's own proposals to indicate on station CIS screens if an incoming train's accessible toilet is out of action. However, if the station has no available accessible toilet and/or there is no means of getting off the train at an intermediate station because staff will not be expecting the passenger the passenger has little alternative but to travel as planned. Otherwise, the booked journey will be vitiated, so this warning is of limited benefit, and could well mean a disrupted journey with considerable potential delay in any case: an hour's wait for the next train is not at all unusual.

Where a passenger has to leave a booked train en route or declines to board it in the first place, in accordance with its DPPP, the operator's staff must rebook that passenger's assistance to ensure that the journey can be made with the minimum delay and inconvenience. Such delay should qualify for compensation at least under Delay Repay but probably also some additional benefit should be provided for the failure by the company whose train has brought this situation about.

Given their overlapping areas of interest, we have answered both 10 and 12 in this section.

Action 11: *ORR will publish the results of its large programme of research, looking in depth at accessibility and assistance, in 2017. It is expected that the results will provide a snapshot of industry performance and include industry level recommendations to take forward (further information on the research is provided in Section 7 on Spontaneous Travel).*

ORR's findings are awaited with keen interest. Any good practice should be noted and other operators encourage to emulate this achievement. Where poor performance is concerned, operators need to take immediate action to remedy the shortcomings. ORR needs to ensure that any recommendations made are acted upon without delay.

However, a disabled person's travel options are not solely rail-based. All passengers, disabled or otherwise, have to reach the station in the first place and be able to travel onwards from the destination station. It may be a simple matter to find out about bus accessibility or taxi provision close to home, but at other destinations it is harder to do, even in the internet age.

We welcome recent developments in reduced booking times for assistance by some operators and in Turn Up and Go travel with five operators, but these still have their limitations in that many of the principal destinations fall outside the scheme. We are impatient for TUAG schemes to be extended to other operators to allow longer-distance journeys, but it is important that the terms of use are uniform and that the system will actually work. We appreciate that current DPPP arrangements for all operators allow for unbooked assistance recognising that disabled people also need to make spontaneous journeys, but not all are trouble-free.

Current evidence is that awareness of the assistance-booking arrangements amongst disabled and older people is relatively low. Encouragement to more people to use it will make further demands on the industry which it is often struggling to meet assistance requirements now.

Action 12: *DfT is exploring with the Rail Delivery Group (RDG) the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.*

We have responded to this under point 10 - the two are closely allied – and also under Action 28.

Action 13: *We are exploring with RDG the possibility of placing dynamic notifications on the Stations Made Easy web pages, of the availability of accessibility features on trains.*

The theory behind this is welcome, though depending on the nature of the train journey, it may only give very short notice. We are perturbed by our experience under existing DPPP arrangements whereby facility failures at stations should be shown within 24 hours; we know of countless incidences where this has not been the case.

We worry that if the system cannot cope with a 24-hour timescale now it will find it hard to manage in addition the much shorter times necessary for specific trains. It has to be absolutely reliable or passengers will have no trust in it. The mechanisms for achieving this level of improvement in information dissemination are not obvious. It would be a welcome benefit if it can be achieved.

Action 14: *We are also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.*

Similarly we welcome such a move and no doubt a phone app, use of social media or similar will provide the technological means to do so. Again, however, we worry that passengers will not be alerted of any change. Under current arrangements, although the DPPP expects operators to warn passengers if their booked arrangements are known to be disrupted; very often no such notification is received until passengers are underway – if any such notification is received at all.

The success of this will depend on the format of the information supplied. Sending out a general message about disruption on a specific line may not grab the passenger's attention but a message relating to his particular journey would. Details of individual journeys are held by Passenger Assist but it is unclear to us how this database can interact with other industry systems to generate such warnings.

Action 15: *We are working with the Rail Safety and Standards Board (RSSB) to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements aimed at those with hidden disabilities.*

Transport Focus welcomes any means of reducing the cost of a service, always providing that service delivery does not suffer as a result.

Our fuller response is given at Action 42 which, it appears, is virtually identical with this Action.

Action 16: *We are also investing in a new rail innovation accelerator which will look at how the availability of facilities can be improved.*

Is this not also repeated as Action 43, except that here only 'facilities' is mentioned whereas 43 mentions specifically 'accessible facilities'?

We have responded under Action 43.

Action 17: *We will commission research, which will be published by 2018, to measure the impact for passengers of work to improve rail vehicle accessibility since the introduction of Rail Vehicle Accessibility Regulations (RVAR) and the introduction of the Persons of Reduced Mobility Technical Specification for Interoperability (PRM TSI).*

Rail vehicle accessibility has improved considerably since the introduction of RVAR/PRM TSI. New vehicles entering service since 1999 and those refurbished since then have offered far higher levels of accessibility, such as: wheelchair spaces; accessible on-train toilet cubicles; priority seating; hand rails, grab poles; lighting and contrasting and non-slip floor surfaces. Of interest will be the improvement to stock which entered service as inaccessible and which has been refurbished to make it compliant, with 2020 in view.

Action 18: *By the end of 2017, we will publish performance data on accessible features on trains, and details of any remedial action necessary to improve both the quality of the data reported and any areas of poor performance.*

It is not immediately clear to us what is meant by 'performance data on accessible features' as most accessible features are static: priority seats, wheelchair spaces, handholds, seat-back grips and so on. It is hard to see how data about these could be kept. We would expect at-seat electronic reservations to be covered, but these include all categories of passenger; there is no bespoke accessibility element to them.

Accessible toilet cubicles is one area where closer attention would be of benefit, especially given how a non-functioning accessible toilet can seriously affect disabled people's journeys if they cannot move to another carriage. (This matter is covered further elsewhere in this response.) In some cases, the train has only one such cubicle, which can lead to the passenger having to make alternative travel arrangements and experience delay. Data which could highlight poor work at one depot where a disproportionate number of non-functioning toilets originate would be of great benefit.

We would expect the at-seat alarm systems at wheelchair spaces to be investigated and reported upon. Too often these are not unlocked when passengers board. There needs to be a means of checking back that the system was made available, not merely that it works if unlocked.

Many passengers rely on features such as audio/visual customer information screens. Too many trains still lack visual information systems and few have systems where staff can intervene during disruption to amend recorded information. It is important that staff are trained how to make announcements during disruptions. It is equally important that all passengers have access to the same information. Provision needs to be made for hearing-impaired passengers on driver-only trains, for instance.

Other equipment such as lighting and door controls do not, in our view, constitute accessibility features, per se.

The most important accessibility feature aboard any train is the staff. Too often staff fail to appear in passenger saloons; a disembodied voice over the public address system giving details of where they can be found is of no use to many disabled people who simply cannot get to that point of the train at all, or only with considerable effort. What means is there of checking that staff do circulate in public areas at frequent intervals?

Action 19: *We will also share the performance data reported to us with ORR, to inform any action they take to ensure operators are meeting their legal and requirements to comply with accessible rail vehicle standards.*

We would welcome your feedback. Do you agree or disagree with the actions proposed? Are there any other areas which require further attention? Please explain why.

It is important that all such data is passed to regulators to enable them to take these matters up with operators. It is ORR's responsibility to ensure that improvements are effected as a result.

Action 20: *We will support the DVSA in its activities to communicate with operators on, and incentivise prompt compliance with, PSVAR, and to take decisive action where this does not happen. We will expect the DVSA to report annually on the action taken.*

We welcome this action to ensure prompt compliance and to take suitable action if this does not apply. Annual reporting is welcome to give a good overview of provision.

Bus Passenger Survey 2016 results (in England) show satisfaction with accessibility through a number of aspects:

- Provision of grab rails ranges from 77% to 94% for all passengers – which changes to 64% to 91% for passengers with a disability
- Getting on the bus ranges from 81% to 97% for all passengers – which changes to 80% to 98% for passengers with a disability
- This goes alongside accessibility of the bus stop, which ranges from 82% to 93% for all passengers and 76% to 94% for passengers with a disability.
- In the majority of authority areas, 'boarding the bus' is one of the set of key drivers of satisfaction – in some areas it is the third highest factor.

In addition, accessibility of information needs to include audio-visual information on board to provide passengers with the quality of support they need for their journey. Currently, satisfaction with on-board information ranges from 51% to 86% for all passengers and 43% to 86% for passengers with a disability.

Clearly there are areas of good practice. However, the extent of these ranges shows how different the experience is from one area to another, especially for passengers with a disability. This not only highlights the need for decisive action, but for compliance to provide a consistently high-quality experience across all areas and passengers, which is measured and benchmarked at the point of experience.

The Welsh Government introduced a voluntary quality bus standard, to ensure that the quality of local bus services is consistently and universally available throughout Wales and local bus operators are encouraged to improve the quality of service provision. The standard includes core elements that must be achieved to be eligible for public funding through Bus Services Support Grant (BSSG). An enhanced standard then attracts a premium payment, with points-based assessment of additional requirements such as information about unplanned changes, real-time systems, participation in ticketing schemes, audio-visual next-stop information and completion of disability awareness and equality driver CPC modules.

Action 21: *We will review, with Government partners and stakeholders, the reasons why some taxi and PHV drivers refuse to transport assistance dogs, and identify key actions for local or central government to improve compliance with drivers' legal duties.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

Transport Focus has no remit to cover taxi and private-hire vehicles. However, our remit covers disabled passengers who are often obliged to use taxis during engineering works when train services are suspended, or if using stations inaccessible to them. We expect rail companies to ensure that any such passengers with assistance animals are carried without question. The railway's duty to assist passengers breaks down if this is not the case.

Action 22: *We have begun publishing enforcement newsletters aimed at local authorities (i.e. all Blue Badge teams and parking teams) to promote enforcement success stories and good practice, in order to help encourage better enforcement of disabled parking spaces. We will also continue our regional engagement workshops with local authorities and will work with DPTAC on both initiatives.*

Rail operators' DPPPs require them to ensure that no abuse of blue-badge spaces occurs on their premises. No word is ever heard that this is being effectively undertaken. It would be reassuring if this were reported from time to time.

On the question of blue-badge station parking, which seems not to be covered elsewhere, it is often the case that the prescribed amount of such parking as shown in the DfT's *Design Standards for Accessible Railway Stations* is not provided.

Action 23: *We will work with the bus industry, DPTAC, Driver Certificate of Professional Competence (Driver CPC) training creditors and the DVSA to seek to ensure that the training of bus drivers in disability awareness and equality reflects the Department's recently developed best practice guidance, and that appropriate arrangements are in place before such training becomes mandatory in March 2018.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

We would find it difficult to understand why any bus driver would refuse to carry an assistance dog under normal circumstances. Driver training should cover such eventualities so there is no reason for them to be ignorant of the rules.

Results of the Bus Passenger Survey from autumn 2016 can be seen at <http://d3cez36w5wymxi.cloudfront.net/wp-content/uploads/2017/03/04160441/Bus-Passenger-Survey-Autumn-2016.pdf> and from our report *Bus driver training: What works? What next* (July 2015) <http://d3cez36w5wymxi.cloudfront.net/migrated/Bus%20Driver%20Training%20What%20works%20What%20next%203%20July%202015.pdf> shows the impact which drivers have on bus passenger satisfaction.

We welcome this action to ensure driver training in accessibility and equality in line with the DfT's best practice guidelines. Bus Passenger Survey 2016 results (in England) again give insight to passengers' satisfaction with the driver:

- Nearness to the kerb ranges from 86% to 97% for all passengers and 83% to 98% for passengers with a disability. This point also needs to sit alongside good enforcement of parking restrictions, to ensure bus drivers can access bus stops effectively
- Greeting and welcome ranges from 60% to 92% for all passengers and 56% to 91% for passengers with a disability
- Helpfulness and attitude ranges from 65% to 92% for all passengers and 58% to 87% for passengers with a disability
- Time to get to a seat ranges from 66% to 91% for all passengers and 59% to 92% for passengers with a disability

These ranges again show the disparity and variation in customer service from one area to another and for passengers with a disability.

Our work on bus user satisfaction also shows that the single most important factor that promotes passengers from just 'fairly satisfied' to 'very satisfied' is the customer service they receive from the driver. Other aspects go hand-in-hand, including drivers deploying ramps – so these must be in working order and deployed when requested – and also engaging with passengers on space for wheelchairs and buggies.

Our research into driver training (2015) showed that whilst the driving test is a benchmark for technical skill, there is no benchmark for customer service; however, the quality of this aspect is crucial to the passenger experience. Our research found that training rests on four fundamental pillars:

- recruitment and driver development
- development of training and training materials
- development of trainers
- development of a customer service focused organisation (systems, programmes and policies that support bus driver training objectives).

Whilst training has developed a long way in the past few years, it is the consistent quality of delivery and measuring the impact on behaviour that makes a difference. The best training will be delivered by those who have a sound process for continuous improvement. The better the feedback loop providing management with the outcome of interventions, the greater the ability to improve training.

Action 24: *We will support the Office of Rail and Road (ORR) in its monitoring of disability equality and awareness training undertaken by train and station operators.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

In drawing up our comments on new franchise submissions, Transport Focus always stresses the importance of such training. Under their DPPP requirements, station and train operators must supply details of training undertaken to ORR every year and to list as fully as possible the type of training given to staff at various levels. We welcome the apparent increasing awareness of the importance of such training to staff at all levels and while the practicalities of ramp deployment may be left only to those who need to undertake such work on a daily basis, the general training in accessibility matters at all levels is vital. It helps management appreciate the necessity and importance of accessibility expenditure.

Part of the DPPP procedure is that ORR consults Transport Focus on the content of new operators' drafts and to any significant proposed amendments. We give detailed responses to each.

Action 25: *We will encourage taxi and private hire licensing authorities to promote disability awareness and equality training to licensed taxi and private hire drivers and recommend, in our best practice guidance, that such training be mandated in their licensing policies.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

As pointed out earlier, Transport Focus's remit does not cover taxis and private hire. However, such vehicles are hired by rail operators to carry disabled passengers in a number of circumstances. For that reason it is vital that drivers have suitable training. We trust that rail companies give this adequate consideration when arranging contracts with the companies whose vehicles they hire.

Consultation Question 7:

What additional action could Government, regulators or transport bodies take to ensure that transport providers and staff have a better understanding and awareness of the access and information needs and requirements of passengers or transport users with less visible disabilities (i.e. those with sensory or cognitive impairments including dementia, autism or mental health conditions)?

It is vital that staff training involves all types of disability, how to recognise various conditions and how best to assist. While this is improving in general, it is not at all

clear that all hidden disabilities, for instance, are being covered. Passengers should not have to disclose the nature of their disability to staff at the station.

This is especially important due to the ageing population and the likelihood that the incidence of such disabilities will increase.

Deeper analysis of the National Rail Passenger Survey reveals that respondents with mental-health and cognitive-impairment issues expressed greater personal security concerns, requiring rail companies to give this area particular emphasis.

If such passengers are booking assistance it is important that their exact requirements are made clear to staff making the booking. For the avoidance of doubt and misunderstanding, it may in some cases be necessary for a carer to make the initial contact and give the relevant back ground details; in theory then the passenger need then only give each journey's details as the nature of the assistance required can be recorded in the system to avoid repetition of identical items.

Regulators need to ensure that company systems are equipped to record such information. Any failures of assistance for such passengers need special handling to prevent a recurrence.

Action 26: *ORR will publish the results of its large programme of research looking in depth at accessibility and assistance in 2017.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

We look forward to seeing the results of this research. From research which we have undertaken in the past it is clear that in some cases assistance is extremely good, less so elsewhere. Not infrequent cases of significant failure in providing assistance were recorded. We trust that the overall picture will have improved, though we have worries that it will not have done so across the board.

If trends are seen at certain stations or with certain operators, we trust that ORR will raise the matter with them quickly so that improvement can be effected without delay.

Transport Focus has undertaken a good deal of research in this area also, not only the passenger surveys mentioned in the introduction, but also mystery-shop research into assistance provision, which is covered in a later section of this document.

Action 27: *We will report on the progress of the joint research with Transport Focus to clarify the challenges inhibiting passengers from travelling, by the end of 2017.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

This will broaden our knowledge of passengers' needs when travelling by public transport.

Consultation Question 8:

As a passenger or organisation representing disabled people, what is your experience of trying to travel spontaneously?

- *What steps could transport providers and operators take to promote or reduce restrictions to spontaneous travel?*
- *What action could Government, regulators, transport operators or providers take to increase spontaneous travel?*

Several key areas, depending on the disability:

- Information: about when services run the facilities provided during the journey; catering; toilet availability en route; known engineering work and road replacement vehicles
- Whether necessary assistance will be available, as advertised; whether lifts, for instance, are working
- Bus availability/accessibility.

Transport operators need to ensure that their information services are absolutely up to date; a single broken-down lift can ruin an entire journey or make it pointless if heavily delayed as a result. If known about before setting off, passengers can often make alternative arrangements or simply choose to travel another day, although that prevents spontaneity.

Staff must be provided in suitable numbers at key points on the journey. Without doubt, staff are the most important element in assistance, whether for booked or spontaneous travel.

To increase spontaneous travel, staff need to be available and they need to be well trained. Information systems need to be absolutely accurate as to functioning lifts and toilets at stations (and, in due course, on trains).

We welcome the Turn-up-and-go assistance operated by a number of train companies, but this applies only at the operators' own stations and by their own trains. It does not apply to connecting journeys and not necessarily at interchange points either, depending on the routes involved, so the benefit is reduced. We welcome also the under-24-hours' notice required by some other operators, but again this is usually only for their own services, and while that makes travel easier for those who are only making journeys between that operator's stations by its own trains, it denies inter-franchise journeys, which might be quite short. ScotRail, though, requires only 4 hours' notice for any journey on its trains or between any stations in Scotland (regardless of operator); while this is hardly spontaneous travel, it beats the offer of many other operators.

Regulators could encourage operators to improve their DPPP provisions generally to emulate best practice elsewhere; TUAG is just one aspect.

Passengers also need to travel by other means: information about bus travel and accessibility is far less easy to find than rail. Traveline can give timings, but not necessarily that buses are low-floor and accessible. It is impossible to predict with

buses whether the wheelchair space is free or not and on routes with limited frequency, this can be a major drawback. Inability to complete the journey by bus may vitiate the point of travelling. Many companies do not offer a taxi option if the wheelchair space is full. In many parts of the country, fully accessible taxis are few.

Action 28: *DfT is exploring with RDG the ability for train operators to provide 'alternative journey options' if the journey becomes unsuitable – for example, if the only accessible toilet on a train goes out of use unexpectedly.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

We have covered some areas of this already in our response to Action 10.

We trust that this will not require extensive exploration with RDG. Under current DPPP arrangements, a passenger whose itinerary is disrupted for whatever reason should have their journey/assistance rebooked as a matter of course. (Guidance on DPPPs - *How to write your DPPP: A Guide for Train and Station Operators*, published by DfT in November 2009 - surely covers this matter already.)

It would be welcome if the industry would reveal the number of unprompted calls made to passengers to warn them of disruption affecting booked assistance. Section C, paragraph 4 of DfT's DPPP Guidance makes this a commitment: "Where passengers have booked assistance in advance through APRS that, because of service disruption, is no longer valid, operators must give a commitment to contacting the passengers to inform them and, if necessary, make alternative arrangements (such as rebooking assistance)". Information available to us suggests that observance of this is very much the exception rather than the rule.

While the failure of an accessible on-train toilet should be communicated to a passenger reliant on that facility, so should the cancellation of or delay to a booked train.

Action 29: *DfT is also exploring with RDG how notifications of such incidents can be provided to passengers as early as possible.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

When making an assistance reservation, passengers are usually asked for a mobile telephone number or other means of contact to meet just such an eventuality if services are disrupted. More detailed investigation of journeys is necessary to ascertain which particular train/unit or specific station is involved to ensure that affected passengers are contacted in good time. It is unclear whether scrutiny of the Passenger Assist database alone is capable of providing this level of information. Equally unclear is whether existing staffing could encompass such additional work.

Better use could be made of social media, if the passenger has given this option and has such a means of contact. Certainly an improvement in the use of text messaging, emails (depending on the amount of notice possible) or even just the telephone (landline or mobile).

Consultation Question 10:

As a passenger or organisation representing disabled people, what is your experience of using Passenger Assist?

We would welcome ideas on what further developments could be made to the Passenger Assist system to make it more attractive to users with accessibility needs: particularly those who currently choose not to travel by train.

Transport Focus's predecessor organisation Passenger Focus undertook three mystery-shop surveys of assistance provided to passengers, both as Passenger Assist and under the previous Assisted Passenger reporting System (APRS) and the even earlier Disabled Passengers Reporting System (DPRS).

Our research into Passenger Assist in 2013 (see: <https://www.transportfocus.org.uk/research-publications/publications/passenger-assist-summary-report/>) showed that staff often deliver excellent service, but it lacks consistency. From the booking stage onward passengers experienced then, and still do now, varying levels of service. Some journeys passed off very well indeed, with the assistance provided as requested at every point. Other journeys were less successful but were able to be made. In some cases no assistance whatever was forthcoming at certain points and in some cases passengers were unable to alight from the train and were carried on to a later station. It was immensely disappointing to find that only 79% of the mystery shoppers were assisted off the train by staff; 5% were helped off by another passenger and 15% had no help at all.

These findings reflect subsequent anecdotal evidence that the greatest failure in the assistance process lies in assisting passengers to get off the train – often with serious results. In cases where reserved seats or wheelchair spaces are concerned, it is hard to see how staff can miss the passengers concerned. We appreciate that difficulties are more likely to arise on unreservable services as to whereabouts on the train the passenger requiring assistance is; this can be overcome to a large extent by ensuring that staff (where available) advise the destination station of passengers' location.

The whole assistance process, however, relies upon a staff presence and the need is for fully-trained staff. The need for staff extends to trains also. In too many cases on-train staff fail to even pass through passenger accommodation during the journey, let alone make themselves known to disabled passengers.

To have greater confidence in assistance being delivered, it is important that operators keep records of assistance bookings and of those successfully delivered. Any instances of assistance failure need to be fully investigated to avoid repetition of the same or similar failures.

The report of this mystery shop (undertaken in 2013 and published in March 2014) is available at: <http://d3cez36w5wymxi.cloudfront.net/migrated/Passenger%20Assist%20summary%20report%20-%20March%202014%20-%20FINAL.pdf>

The Recommendations and Conclusions made in the report are at Appendix A.

In all cases a fall-back contact which passengers can use if they find themselves stranded and assistance has not appeared must be available and it needs to be staffed at all times when trains are running.

Non-users of rail will be encouraged to use the system only when they are sure that their journey will be successful. Still now, too many journeys are not wholly without unfortunate, but avoidable, incidence of assistance failure – either staff are prepared but do not give the sort of assistance that the passenger believes he has asked for when booking, or no staff are available at all. Staff taking assistance requests must ensure that they are clear as to the type of assistance that passengers have asked for.

Assistance needs to be available from all public sources. The use of help points is recommended in DPPPs yet the staff responding to help point messages often are unable or unwilling to assist disabled passengers or even to appreciate the predicament such passengers may find themselves in. We question the level of training which some of these staff have received and their ability to refer passengers to those staff who can help them better. Later in the evening, also, the resources on which help-point staff can draw is unclear, when the usual assistance lines have closed. A permanent fall-back emergency telephone number is needed, available to passengers at all times when trains are running, should they find themselves stranded if an assistance failure has occurred.

Consultation Question 11:

When you purchase a ticket using a vending machine, what was your experience of accessibility?

For example, do ticket machines provide clear information? Are you able to book the correct ticket? Are there any particular issues that we need to consider when designing or delivering smart ticketing programmes?

Transport Focus has undertaken considerable research into passengers' needs when using TVMs. We communicated these findings and the results of our own investigations to the then Minister in 2014: see <http://d3cez36w5wymxi.cloudfront.net/migrated/Improving%20ticket%20vending%20machines%20at%20stations%20-%20letter%20and%20presentation.pdf>

We are concerned that TVMs present problems for all users, not only for disabled passengers, but disabled passengers have further hurdles to obtaining tickets from TVMs. One problem which affects all passengers is that some TVMs do not offer all the appropriate ticket options for a particular journey. Sometimes machines installed by a different rail company may not offer all the same tickets available for journeys from that station. Even where all ticket options for a particular journey are available, the related restrictions may not be available, or may not be reproduced in a readily

understandable format. As a result passengers may pay for a more expensive ticket that they really need.

Beyond those problems, disabled people have the added disadvantage of mobility problems to reach the TVM in the first place or to operate it having got there. Any visual impairment hampers reading the screen and/or buttons easily or at all; dexterity issues can make pressing the buttons or touching the screen difficult or impossible.

We welcome the development of VITA-enabled TVMs (Virtual Ticketing Agent) on which the entire transaction can be taken over remotely by a member of staff with retail training who can speak to and hear the passenger and issue the ticket, much as a clerk in a ticket office would do. This has a multiple benefit: the passenger does not have to try and understand or remember the restrictions and validities of the fares offered on the screen as the options can be explained and the clerk can make the decision based on his expert knowledge of a complex fare structure. The passenger has only to use the card payment buttons. Transport Focus has seen and used one of these machines and found the process of engaging staff to undertake the transaction straightforward.

Of course, we welcome National Rail's recognition of the difficulty for many disabled people in obtaining a ticket before boarding the train. For this reason we ensure that DPPPs repeat the undertaking in the National Rail Conditions of Travel that those passengers whose disability prevents them from easily buying a ticket beforehand, may so without penalty during the journey. Greater emphasis of this facility needs to be made to disabled people. Perhaps a reminder could be dispatched with each DPRC issued. (Greater clarity should also be given to the fact that the reduced-rate tickets for wheelchair users or accompanied visually-impaired passengers without a DPRC cannot be obtained from a ticket machine.)

Smart ticketing: We believe that the introduction of smarter ticketing in public transport could make life easier – and cheaper – for passengers. For this to happen though, it is essential that any smarter ticketing schemes are well designed and properly implemented.

In order to make sure that the passenger is at the heart of the development – that products are designed for ease of use rather than what is convenient to administer – we are working on a wide-ranging smart-ticketing research programme, on behalf of DfT: see <https://www.transportfocus.org.uk/search/?q=smart+ticketing>. While most surveyed found that contactless is suitable for paying fares, many were concerned that, while they were happy to use it for short journeys where costs are likely to be low, they were more reluctant to use it without some indication of the overall cost on longer journeys. We would not condone the withdrawal of conventional paper tickets unless passengers were content with electronic alternatives.

Action 30: *We will work with representative bodies (e.g. the Confederation of Passenger Transport (CPT) and the Rail delivery Group (RDG)), and will support the work of regulators (such as the Office of Rail and Road), to encourage greater promotion of information about the rights of disabled travellers and what they are entitled to expect in terms of services and facilities, as well as developing easier ways to register complaints when things go wrong.*

We would welcome your feedback. Do you agree or disagree with the action proposed? Are there any other areas which require further attention? Please explain why.

Disabled passengers' rights/duties and the assistance available to them on rail journeys are covered in each operator's DPPP, copies of which in various formats are free of charge from the company's customer service centre. Each DPPP comprises two documents. One is a publicly available policy summary informing passengers of the assistance provided and alternative arrangements. This must also be backed up by the operator's strategy, including improvements, monitoring and evaluation and staff training.

These documents must observe the guidance issued by DfT in 2009, before responsibility transferred to ORR, drawn up by a panel including Transport Focus's predecessor body. We believe that the guidance would benefit from a review and update.

Transport Focus also comments on all draft DPPPs drawn up by new franchisees and on their Passenger's Charters which give details of how to complain.

Much more visible information should be posted on stations and in buses (which do not have the protection of Charters and DPPPs in the same way as rail) and trains, however, so that passengers can see the necessary information without having to hunt for it.

We welcome the offer of compensation for failed assistance from some of the more progressive rail operators and commend this best practice to other operators.

Bus operators are some way behind rail operators in this area. We welcome the voluntary good practice offered by some bus companies and would like to see it extended throughout the industry. However, we question why bus and rail are treated differently. Rail service providers must produce a DPPP as a statement of practices and policies on the arrangements to assist older people and those with reduced mobility to travel by train, which is a condition of the operating licence. In addition, rail operators must publish a Passenger's Charter as a statement of commitment to the safe and high quality service that passengers have the right to expect. It is unclear to us why no equivalent requirement for these documents exists in the bus industry – even where the basis of entitlement is required by law.

The range of representative bodies to be consulted on this action should include disability representative organisations.

It is our experience that many disabled passengers have low expectations of their journey being trouble-free and are less inclined to complain than other categories of passenger. Transport undertakings should actively encourage feedback (good or bad)

on their performance to enable them to take suitable action where necessary or to emulate best practice elsewhere.

Consultation Question 12:

We would welcome views, particularly from disabled passengers, on the current systems for resolving transport disputes, and whether processes could be further improved.

The railway has a long history of complaint handling. Since the advent of franchising, each rail operator must have a Complaints Handling Procedure in which it sets out its policy on dealing with complaints, and the timescales involved. Transport Focus is one of the two appeals bodies which may take up unresolved rail complaints if the passenger contacts us. (We are not the appeals body for complaints about buses.) All rail companies can be contacted by post, email, telephone, textphone and various social media. They undertake to respond in a format specified by the passenger.

Disabled passengers tend to complain less due to initial low expectation. For many, making a complaint requires a major effort. Many transport operators have a response time of up to 20 working days. We are aware of a number of backlogs which are extending even these turn-round times and are working with the operators concerned to reduce these.

It is vital that customer service staff live up to the name and consider the circumstances of the individual complainant when arriving at their judgement. In two similar cases, the effect of a situation on a disabled person may be far more serious than on anyone else and therefore cases should always be dealt with on their merits.

Action 31: We will work with transport authorities and representative bodies (e.g. CPT and RDG) to encourage the provision of better information about levels of accessibility on vehicles and services, so that disabled people can make informed choices about their journeys. This will include issuing guidance concerning the provision of information about the accessibility of bus services.

Rail services have to be described in detail for the benefit of intending passengers – as part of the DPPP – but no such detailed information requirement is made of road vehicles. We therefore welcome this action as it will enable passengers to have a better idea of the facilities available aboard each vehicle.

As far as buses are concerned, it would be helpful if similar information were shown in timetables for each journey, or for routes overall where identical vehicles form the fleet, so that passengers can tell, for instance, if a low-floor vehicle will operate a particular service, for instance. Many operators already offer excellent information on such features. The provision of on-bus information systems announcing routes and next-stop information will be welcomed by many users.

The Transport Act 2000 places a duty on local authorities to ensure local bus service information is provided, including appropriate information about facilities for disabled persons, travel concessions and connections with other services. The output from this duty ought already to be measured and enforced, with prescribed inclusion of facilities

in published information, supported by bus service registration details – for automatic throughput to public information channels, such as bus stop information and Traveline.

The disadvantage with a bus is that never more than one wheelchair space is available and this is provided on a first-come, first-served basis. Some operators, principally in urban areas offer a taxi alternative, but in other areas no such support is available and the bus service may be infrequent. It seems impractical in the shorter term at least to indicate remotely whether the wheelchair-space is already occupied due to the possibility of short-notice vacation and reoccupation en route. We would welcome wider consideration of taxi schemes for wheelchair users who cannot board their chosen service.

The high-profile recent legal case regarding appropriate occupation of bus wheelchair spaces prompted DfT to consider how this matter might be addressed satisfactorily, and a working group, which involved Transport Focus, DPTAC, CPT and others considered that driving training was vital to resolve issues.

In the longer term, some means of alerting intending visually-impaired passengers at a bus stop of the approach of the bus they require will be welcome. In the meantime, driver training must ensure that they stop the vehicle if it seems that a passenger may wish to board and to give details to the passenger of the route number, if required.

The range of representative bodies to be consulted on this action should also include disability representative organisations.

Action 32: *We will support the work of the RDG and ORR to encourage further promotion of the benefits of DPRC in order to further increase its take up and use.*

We would welcome your feedback. Do you agree with the action proposed? Are there any other areas which require further attention? Please explain why.

Transport Focus welcomes action to promote the existence of the DPRC. (Much the same could be done to promote the Senior Railcard.)

We question whether the eligibility criteria for the DPRC may not need review. A recent case referred to us highlights the apparent incongruity whereby some people with seriously impaired mobility due to balance, stamina and energy issues do not qualify for a DPRC, despite holding blue badges, whereas hearing-impaired people, some of whom have no difficulty moving, do qualify. Reliance on state-benefit eligibility, it seems, is limiting take-up and denying a DPRC to some who need it most. If qualification for a blue badge is to be investigated, then also the criteria surrounding DPRC eligibility should be open to new scrutiny.

Greater prominence could also be given to the reduced-rate fares for accompanied visually-impaired passengers and wheelchair users who do not have a DPRC, although it is appreciated that in many instances its range of discount is limited and full-rate off-peak tickets may prove better value.

Insufficient recognition is given of the season-ticket two-for-one scheme for visually-impaired passengers.

Consultation Question 13:

As a person with a hidden or less visible disability, or as an organisation representing people with hidden disabilities, we are keen to receive your views on the desirability and feasibility of introducing a national assistance card.

We have listed some questions below which you may find helpful in responding. However, the questions below are not exhaustive and you should not feel restricted by them.

Transport Focus represents the views of all passengers, including those with disabilities, hidden or otherwise.

We recognise that many organisations (e.g. Blue Assist and many bus/train companies) have issued such cards for use by disabled people. We know from feedback received through a number of channels that these are valuable to many passengers – for instance, those with impaired hearing or those with cognitive-impairment issues.

The benefit of a nationwide scheme would be that the cards could be used throughout the country in the certain knowledge that staff will recognise them instantly, understand their purpose and respond suitably. Hopefully, they can also be used in other spheres of public life – e.g. while shopping or using other public services.

Rather than a single card, a series of identically formatted but variously-worded cards would be necessary to represent the individual needs of each user.

Printed cards could be available for the more usual needs, such as:

- Please face me, I lip read;
- Please offer me a seat;
- Please assist if required;
- Please do not pull away until I am seated

together with semi-blank cards onto which the user can write other needs.

We feel that the proposed title ‘national assistance card’, in the minds of older people and thus many of those likely to benefit from such a card, evokes notions of unemployment benefit payments. Perhaps a more neutral but positive term could be found, but which emphasised the national recognition and applicability of such a card - and beyond simply the narrow realm of transport.

Not mentioned elsewhere, but closely related to the proposed assistance card, is the now quite well-established Priority Seat Card. Since introduced initially by Southern some years ago, this scheme has been extended to various parts of the country, often as new franchisees assume operation. Those passengers who can prove a need to sit (due, for instance, to disability, age or pregnancy) can apply for such a card from many train companies for use on their services. The new generation of cards is interavailable over many operators’ services. We welcome these cards as they enable passengers to prove a recognised need for a seat without having to explain why; they are particularly helpful to people with hidden disabilities, for use on services where reservation is not possible or where no on-board staff are available to assist. We urge all train companies (and bus companies too) to emulate this best practice.

Consultation Question 15:

How can the Department for Transport support Community Transport Operators further?

The reduction in frequency or total withdrawal of many bus routes in recent years has meant that many people, especially older or disabled and especially in rural areas, are deprived of public transport. For this reason, reliance on community transport projects has increased as in many cases this is the only affordable means of travel for many people to maintain their lifestyle and enable them to shop, make social visits, seek healthcare and so on.

Providing more demand-responsive services seems a sensible way forward where current bus service levels are thin or have been withdrawn. Transport Focus undertook research last summer into three different models of demand-responsive transport: *Demand responsive transport: users' views of pre-booked community buses and shared taxis*, June 2016 at <https://www.transportfocus.org.uk/research-publications/publications/demand-responsive-transport-users-views-pre-booked-community-buses-shared-taxis/>.

Low awareness of these services is disappointing although DRT is welcome in areas where public transport has been lost. The *Overall findings* of the report are at Appendix B.

Especially where no scheduled bus services operate, ensuring that bus concession holders can use Community Transport at no cost to themselves would help.

Action 37: *We will work with Mobility Centres and the British Healthcare Trades Association (BHTA) on promoting the need for training of scooter users and providing facilities for such training.*

Action 38: *We will identify and promote pushchairs, prams and scooters most appropriate for public transport, working closely with the British Healthcare Trades Association and transport providers, by 2018.*

We would welcome your feedback. Do you agree with the action proposed? Are there any other areas which require further attention? Please explain why.

We welcome the intention to identify those scooters which are most appropriate to be carried on public transport. We recall the useful recent work undertaken by RICA in this area. Vital to this also is the need to work with those transport providers which still deny access to their services by users of even 'reference-wheelchair' size scooters.

In some areas this still denies many scooter users, whose machines conform to the length, width and weight requirements for carriage elsewhere, from travel by rail even though the company may use the same types of rolling stock as other operators which do which admit scooter users.

Similar activity to promote push-chairs and prams which are easier to accommodate on public transport, especially on buses where space is at a real premium, will be welcome.

In that regard, some focus needs to be put on the question of occupation of space aboard public transport. Low-floor buses make it easier for prams to be brought aboard but often conflict arises over the use of what is designated the 'wheelchair' space. DfT has recently concluded work on this conflict, drawing on outside bodies such as Transport Focus, DPTAC and CPT; we commend the findings from those deliberations. It is important that drivers are advised how to adjudicate in such disputes and that the company's policy is made clear to passengers.

Action 40: *In 2017 we will commission research to further understand the barriers to travel for individuals with cognitive, behavioural and mental health impairments, to help us develop potential measures to improve accessibility.*

Action 41: *By 2018, we will commission research quantifying the economic, social and commercial benefits of making passenger transport more accessible.*

We would welcome your feedback. Do you agree with the action proposed? Are there any other areas which require further attention? Please explain why.

We welcome these intentions. These disabilities have not hitherto been given sufficient prominence.

Making public transport more accessible could generate additional revenue for operators in addition to stimulating demand for other goods and services from those who currently travel as often as they would like.

It is important for all transport providers to improve staff's recognition of hidden disabilities and their success in assisting passengers.

With regard to Action 41 in particular, data from the Whitehall & Industry Group indicate that in Britain, by 2035, 1 person in 4 will be aged 65 or over and 3 million people will be over 85; this represents huge potential demand by a population which will want to continue travelling much later into older age than previous generations. Action 48 is also relevant here.

Action 42: *DfT is working with the RSSB to launch an innovation competition in September 2017, which will find solutions to reducing the cost of accessibility improvements at stations, including the availability of accessible toilets. This competition will also focus on making improvements for those with hidden disabilities.*

Is this not identical with Action 15?

Transport Focus is taking part in the competition. We trust that it will lead to reduced-cost accessibility features at stations and the provision of additional accessible toilets, though we are concerned that the increasing lack of staff at many stations may reduce the times between which such facilities are available.

We also welcome improvements which will benefit passengers with hidden disabilities.

Action 43: *We are also investing in a new rail innovation accelerator which will look at how the availability of accessible facilities can be improved.*

We would welcome your feedback. Do you agree with the action proposed? Are there any other areas which require further attention? Please explain why.

Is this not almost identical with Action 16?

We welcome all attempts to accelerate the progress of improving accessible facilities.

Action 44: *We will ensure that DfT innovation competitions highlight the need for prospective funding recipients to consider accessibility within their project proposals, where projects impact transport users.*

We would welcome your feedback. Do you agree with the action proposed? Are there any other areas which require further attention? Please explain why.

It was our understanding that disability needs were already included at an early stage in all such projects. Ensuring that this is so has to be a welcome move.

Action 48: *we will develop, in consultation with DPTAC, effective ways of measuring travel patterns and trends among disabled and older people over time as a basis for targeted policy initiatives.*

We would welcome your feedback. Do you agree with the action proposed? Are there any other areas which require further attention? Please explain why.

This is a long-term but welcome move. It is especially important given the ageing population. Disability is a key factor affecting patterns of travel behaviour, and each individual's travel behaviour may well change as a result of ageing and/or of any deterioration in ability.

A P P E N D I C E S

Appendix A: Recommendations and Conclusions to Passenger Assist mystery-shop survey, 2014

Conclusions

The purpose of this research was to understand the passenger's experience of using the new Passenger Assist (PA) system and compare the findings to the research we carried out in 2010, when we made recommendations for improvements. Some of them have been implemented by the industry, at least in part. More passengers are being advised to arrive at the station early, are being given booking reference numbers and told where to meet staff. This is a useful starting point, but greater consistency would offer greater passenger benefits.

In this research we found that the booking process offers a good experience, but it also needs to feed through to a better service consistency for passengers once travelling. Satisfaction with the booking process has moved from 83 per cent in 2010 to 87 per cent in 2013. The overall experience of using the PA service has also risen

slightly to 75 per cent in 2013 from 71 percent in 2010. This shows little improvement in passenger satisfaction from 2010, before the new booking system was introduced. Passengers who require assistance to travel are guaranteed access to rail services by law. They also generally book assistance at least 24 hours in advance. The industry needs to undertake further work to ensure that far greater numbers of disabled passengers receive the full assistance they book.

The research points to current good practice, and also to areas where the industry might usefully focus attention on driving improvements. These points are outlined below, but the need for improved communication and staff training remains high.

The booking system

NRE is directing passengers to TOCs effectively, but sometimes at a greater cost for the caller than if they redial. TOCs normally offer a cheaper call rate than NRE. TOC staff are generally perceived as professional, friendly and helpful. However, passengers are not always given the most complete or helpful information at the time of booking, such as being told booking reference numbers and where to meet staff at the station. PA did not book seats or wheelchair spaces (where reservations are available) in a consistent manner or ask for information on ramp requirements, even to passengers with mobility impairments. There is a lack of uniformity in service delivery – passengers get different information even from the same TOC.

The journey

Passengers' assistance requirements are not always reaching station and on-train staff. The industry fails to consistently provide assistance to board/alight from trains to passengers who have booked. Some passengers are confused about key information such as where to meet staff and who will be providing assistance. TOCs have different trains and reservation systems, so passengers need greater clarity about whether priority seats and wheelchair spaces are available.

Recommendations

The research shows that Passenger Assist is providing a positive service for many passengers. It also indicates where further improvements are likely to improve reliability and enhance the passenger experience.

Booking

1 Passengers would benefit if information provided at the booking stage were standardised both within and across train operating companies. For example:

- What assistance to expect at the station and on the train
- Whether there is a meeting point or where a member of staff will meet them. Each station should have at least one recognised meeting point, such as the ticket office or barrier at smaller stations. This may assist those who find it difficult to locate a member of staff unaided.
- Information about where to sit if a seat cannot be reserved for them. This will only be possible if the industry agrees how to manage the situation. For example, staff at boarding stations should advise staff at interchange and destination stations where in the train the passenger needing assistance is located.
- Information about on-board facilities and availability of staff assistance as promised in the operator's Disabled People's Protection Policy.
- What to do and who to contact if assistance fails.

2 Passengers would benefit from being given a reference number at the time of booking. Offering text confirmation stating the assistance to be provided for the journey would be helpful for some. For others, email confirmation has proved useful. It would improve the passenger experience if everyone booking assistance received confirmation in the form most useful to them. This is especially true in the case of mobility-impaired passengers who are not consistently asked if they require a ramp. Upon receipt of confirmation passengers can check if the details are correct and, if not, can amend them with the TOC.

3 It appears that information is not always being stored on the system, or if it is, staff are not using it consistently. It is important that information is routinely stored and used for booking to avoid passengers having to repeat details, such as the type of assistance required.

The journey

4 Some passengers are still not receiving booked assistance, for example, being assisted to board and alight. A failure rate of 21 per cent in our research for alighting equates to a lot of passengers each year. This figure must be reduced. One option could be for the industry to set targets for reducing failure to deliver assistance as booked. As a starting point, we recommend that the industry audit reports failures and identifies where the process failed. Some TOCs already undertake work in this area, but a nationally-agreed approach would provide TOC managers with information to produce continuous process improvements.

5 Staff, in some cases, are still not receiving information about passengers who have booked assistance. Why? Again, the industry must audit cases where the system has failed to deliver for passengers.

6 Further training on identifying and assisting passengers with hidden disabilities is likely to improve service to this group. This research shows noticeably poorer outcomes for passengers with mobility and cognitive disabilities.

7 Staff on the train need to take a greater interest in disabled passengers. On many of these journeys not only were tickets not checked, but staff either passed through without even acknowledging the disabled passenger's presence, or did not pass through the train at all. Passengers can feel reassured when their booking and their needs are acknowledged and met by staff on trains. This is especially relevant in times of disruption to journeys. It is not clear from the research whether train staff are consistently provided with information about passengers who have booked assistance. The industry might focus on this to improve passenger satisfaction.

8 Further consideration of the following operational issues is likely to lead to improved services to passengers:

- Advising staff at the destination station where a passenger is sitting on the train. Currently this is inconsistent.
- Ensuring that staff assist passengers to the train they are booked on. If staff put passengers on a different train they must advise those providing assistance at the next stage.
- On-board staff are likely to benefit from having a copy of the booking details. This would help them offer a more helpful service.
- Improvements are required to the way passengers are kept informed when disruption occurs as many will not be able to access information via screens or audio announcements. Passengers' specific needs should be asked during the booking process.

Our research shows that staff are often delivering an excellent service. However, it still lacks consistency. From the booking stage onwards passengers receive varied levels of service. Consistency in the information and services provided by those delivering passenger assistance is the key to promoting confidence in the service. Where all else fails, passengers need a back-up plan, a helpline or a way to access help. The industry needs to ensure that this is available and thereby increase the confidence passengers have when they travel.

After the journey

Train companies should commit to undertake PA satisfaction audits and to collect data to show how many booking requests are delivered in full. This service is not always easy to deliver in a rail environment, and there can be concerns that such measures may lead to greater criticism of operators. However, greater transparency can lead to greater understanding and opens the door to improving services.

Looking ahead

Many of these recommendations can be addressed by existing operators. However, some, such as the audit and transparency mechanisms set out above, should form an integral part of new franchise agreements when new contracts are agreed with operators. Building on the foundations of the current service and building in continuous process improvement is the challenge to the industry.

Appendix B: Overall findings – Demand-responsive transport, June 2016

Overall findings

- While there are overall cost savings to be made by introducing demand responsive transport DRT, there can be a significant reduction in the number of passengers when conventional services are withdrawn. However, it may be possible to both save public money and increase passenger numbers if a wider reorganisation is carried out.
- Any DRT service tends to be welcomed where the alternative is loss of public transport.
- Overall, current service users appear to be those who are retired and have no other transport options, as they are more able to accommodate the limitations of the DRT service.
- How a change from conventional bus to DRT is introduced, and how it continues to be communicated, influences how passengers view their particular service.
- Passengers in Suffolk and Hampshire pay roughly the same to use DRT as they did to use conventional services; in Worcestershire they pay more. Concessionary passes can be used at appropriate times, although in Worcestershire pass holders qualify for a reduction, but not free travel. Among the passengers we spoke to, fares were

generally accepted as reasonable and legitimate in order to sustain a public transport service in the area.

- Suffolk Links passengers can travel anywhere anytime, so are not restricted to the routes and times of the conventional bus. Some taxi share users in Hampshire now have a much less frequent service than before, but residents of other villages have gained services. In any case, taxi share was introduced to ensure that at a time of bus cuts everyone had some kind of service available. Unsurprisingly, passengers tend to welcome any kind of service where the alternative is loss of public transport.
- Passengers in each of our three case study areas appreciated the convenience of being dropped off at their front door.
- In Worcestershire and Suffolk the largely elderly and disabled clientele particularly appreciate the company of other regular passengers and the helpfulness of drivers. Similarly, passengers in Hampshire expressed disappointment that taxi journeys are less social than the bus, and noted that the change to taxis has removed the direct, personal connection that they had had with their regular bus driver.
- In Suffolk, passengers appreciated the accessibility of the vehicles. Some users of shared taxis in Hampshire commented that it was easier to get in and out of buses than taxis.
- Passengers in Worcestershire did not generally mind the inconvenience and restriction of having to book in advance. In Hampshire passengers pointed out that the requirement to book the day before rules out spontaneous trips and is out of step with many 'same day' doctor's appointments.
- There was consistently low awareness of DRT services among the potential users we spoke to. When the service is explained, with its accessible vehicles and front door drop-offs, younger people tend to view the services as more geared to the needs of older and disabled people.
- Potential users in Worcestershire may be put off by the shortage of time allowed at their destination in the fixed timetable; limited times and destinations also presented barriers to use in Hampshire.

14 November 2017



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