

TravelWatch NORTHWEST

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Winner of CILT award for best practice in passenger transport (2013)

promoting quality public transport.....

Consumer Policy Team
 Office of Rail and Road
 One Kemble Street
 London
 WC2B 4AN

16th January 2019

Dear Team,

Improving Assisted Travel

Introduction

TravelWatch NorthWest is an independent Community Interest Company representing all public transport users in North West England. We are pleased to give our views on this draft guidance.

The document looks to be fairly comprehensive with a number of welcome new ideas.

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

This is to be commended. Not everyone who needs assistance is disabled. Older people are in more need of assistance, especially if carrying luggage.

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

A more passenger friendly document is the better option. What people need to know is what assistance is on offer, where it is on offer, and how to utilise it.

We believe that every station should have an Access Rating. Big terminal stations, such as those in London, plus Birmingham New Street, Manchester Piccadilly, Glasgow Central and Edinburgh Waverley, should have the motorised buggies that a number of London stations currently have. All stations with an annual usage of over 100,000 passengers should have step free access to all platforms within a specified timescale from now. Any booklet available to the public, regarding assisted travel, should specify those stations where access and/or assistance is not available.

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

Passengers are unlikely to consult a policy document. They do want to know that if they're travelling from A to B, they can access the station and their platform at A, regardless of their circumstances, and with or without assistance as they require, and that they can similarly alight and exit the station at B, again, regardless of their circumstances, and with or without assistance as they require, and that if they cannot use A or B, because of lack of access or assistance, that there is a nearby station that they can use instead.

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

The document described appears to be a general wish list as to how the Train Company will assist passengers without specific detail. As shown above the detail is vital.

Q.5 What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?

In our view, it is not unreasonable that all stations with a reasonable usage should be fully accessible and provide full assistance during the main part of the day, and that those stations that currently fall short of that standard, even though they are reasonably well used, must be made accessible within a limited timescale from now. Others might feel that our figure of 100,000 passengers per year is too high or low, but nevertheless, a figure needs to be set. Where full accessibility at a station is not achieved then a facility must be in place to convey the passenger to the closest alternative station at no additional cost over and above the train fare.

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

In the example quoted of Glynde station, the information provided is woefully incomplete. The line through Glynde runs roughly east-west, therefore Platform 1 will be for those heading west to Lewes and beyond, and platform 2 for those heading east to Eastbourne and beyond. It is insufficient to simply quote platform numbers, each platform should be described as detailed.

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

The examples quoted are reasonable, but probably incomplete, i.e. there are almost certainly other factors passengers need to be aware of.

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

The simple solution to the scenarios given is that the train crew are advised at the boarding station too. On lines that are DOO, the driver should be advised, and on other lines, the guard/train manager. They can then check that the passenger alights at the correct station and receives assistance as required, and are not overcarried in error. They will also know in which carriage the passenger is travelling.

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

A mobile text messaging procedure may be more practical, particularly for smaller staffed stations.

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

Assistance should be available to those with disabilities, yes, but there are several other categories of passenger who may require assistance, including

- The elderly
- Young mothers with walking toddlers and a young child in a pushchair or pram
- Children travelling alone especially at an interchange station.

Q11. Do you agree that: operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff? Should the refresher training focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

Two years seems rather long. This should be treated as a priority for improvement asap.

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

We support this.

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

We agree and recommend that this should also include local bus operators, whose bus stops close to rail stations should be reasonably easy for anyone to access, regardless of their mobility.

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

All the relevant information mentioned thus far should be easily accessed on line by anyone.

Q15. What are your views on the three options we have identified for reducing the notice period for booked assistance?

Reasonable, although all operators should ultimately aim for “Turn up and Go”, even at unstaffed stations. Does the Equalities Act place a requirement on rail operators to accommodate disabled passengers at any time and without advance warning?

Q16. Do you consider that any reduction should be phased in? If so, how might this be implemented?

Yes, and implemented within a finite timescale, the phasing in being used to sort out issues rather than to delay full implementation.

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

Where trains are generally DOO or DCO all the train staff should assist as necessary.

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

We believe that the ORR should specify the minimum redress for assistance failure based on the nature of that failure, giving TOC’s the freedom to redress more at their discretion

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

Passengers should be able to text a designated number or e-mail a designated e-mail address with their requirements. Many passengers will be unfamiliar with the train operator and so the number they should text or the e-

mail address they should use, should apply to all TOC's and be monitored 24/7.

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

We agree that rail replacement services should be made more accessible as far as possible.

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

This is to be commended.

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

We agree with the proposals.

Q23. What are your views on our proposals to clarify the guidance to ensure: (a) passengers do not unknowingly purchase tickets they cannot make full use of; and (b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.

(a) Agree.

(b) Agree – generally speaking there are not enough toilets on trains especially given the failure rate.

Thank you for the opportunity to respond.

Yours sincerely,

John

John Moorhouse
Company Secretary