

**Mobility and Access Committee for
Scotland (MACS)**

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Office of Road and Rail
Disabled People's Protection Policy (DPPP)

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2019/02

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Dear Sir or Madam,

Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP)

Please see below a response to your consultation provided by the Mobility and Access Committee for Scotland(MACS).

Yours sincerely,

Aga Lysak
MACS Secretary

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

MACS supports this proposal, because replacing the word ‘disabled’ with ‘inclusive’ will encompass a greater variety of people. Using this new terminology would now include people who have an impairment but do not consider themselves to be disabled, as well as disabled people with hidden disabilities who choose not to declare their disability. People who might not be defined as disabled but who need assistance, such as people who are temporarily impaired due to surgery or an accident, as well as older people, and people travelling with young children, would now be included.

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

MACS suggests using the wording ‘making rail travel accessible and inclusive’. MACS welcomes the simplified structure of the proposed document, but would prefer to see a branding which is consistent across all publications, on Meeting Places, on the uniforms/id of staff and on booking pages etc. This also has the benefit of making information related to using the railway more understandable to those who have learning difficulties or for whom English is not their first language. We would however also suggest the creation of a dedicated easy-read document using language and formatting guidelines specifically for this purpose.

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?

MACS recommends that the passenger leaflet ought to be concise and consistent across the network to give travellers, who require assistance, the confidence that they will receive a consistent service, irrespective of where they travel. Therefore MACS supports use of the terms must and may which will underpin this aspiration. MACS supports the proposed inclusion of information on accessibility of stations and rolling stock in operator’s policy documents so long as information is provided in the passenger leaflet highlighting where this information can be accessed. That said it should be possible for disabled people to find out information about the accessibility of stations and rolling stock easily online without having to delve through a lengthy policy document. The operator’s policy should be readily available on request in accessible formats e.g. large print, Braille, Easy Read, online in accessible PDF format complying to WC3 standards for web accessibility, enabled for mobile as well as desktop devices, and these formats should be kept up-to-date by the rail providers. It is also vital that passengers retain the ability to find information directly from staff either via phone or at a station.

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

MACS welcomes the proposed requirement that disabled people and their organisations are involved in the production of inclusive travel policies and leaflets and is of the opinion that the timescales proposed are realistic. MACS suggests that proposed timescales applying to the publication of leaflets should be extended to allow publication of information in accessible formats and online.

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?

MACS welcomes the proposal to classify the level of accessibility of stations, however there are several caveats which we would encourage ORR to consider. We suggest there should be a definition of what is meant by 'step free'. This is because 'step free' could potentially encompass platforms accessed by escalators, which would be satisfactory for people who are mobile and can walk for a short distance, but which would constitute a barrier for a wheelchair user, unless a lift was also present. Furthermore, stations being described as 'step free' can be problematic for people using assistance dogs, because the term suggests that escalators may be present, and in most circumstances assistance dogs are prohibited from using moving escalators. Many London Underground stations provide escalator only access to platforms and it may be difficult for a visually impaired guide dog owner to identify stations which are accessible and have fixed stairs or a lift all the way from street level to the platform. MACS advocates for greater access information about stations to be published to inform passengers about the means by which platforms are to be accessed and this should highlight whether fixed steps, escalators, and lifts are available. We would advocate the use of a classification system based on a matrix of several different factors including the level of station staffing and its geographical size. This is because a step free station with no staffing may be just as inaccessible to, for example, a visually impaired person as a station without level access which is small and has full-time staffing. Additionally MACS believes the guidance and classification should be as simple as possible without relying on external regulations such as the new Build regulations, because this is terminology that many people are likely to be unfamiliar with.

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

There are so many discrepancies in the information available to call handlers that MACS is of the opinion that mandatory checks are essential to ensure a successful assisted journey. This needs to be at the earliest stage in the booking / reservation process.

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?

MACS welcomes this proposal because it should empower disabled people to travel by rail because they will know what their rights are, what assistance to expect and know what to do to receive assistance. Statistics show that many people do not use rail travel because they believe it is inaccessible, even if this is not actually the case.

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?

MACS welcomes the introduction of the proposed protocol in facilitating a more reliable service which can be depended upon. MACS notes that the proposed protocol appears to only refer to major station. Some stations are not classified as mainline but are the transition station to an Island, and therefore form part of the lifeline service for a community. MACS therefore suggests the term mainline and transition stations is adopted with a description of what constitutes a transition station. In addition, we would suggest a consistent definition of the term mainline, for example, whether this includes smaller staffed stations or those used as a point of intermodal change such as airports.

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?

MACS welcomes this development, as it should give travellers more confidence in the system. We would highlight though a dedicated assistance telephone line is only beneficial if there are staff available to answer it. The provision of a helpline with a text relay service should also be facilitated to support those with hearing difficulties who are unable to use a regular telephone. In addition, please see our comment regarding the definition of a mainline station in question 8 above.

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

MACS welcomes the intention that rail staff should receive mandatory training and refresher training. Scotland's Accessible Travel Framework has a high level action plan which has a theme of Information and customer service, in addition DPTAC has advisory notes on training of staff. If the Rail industry continues to work with strategic organisations and policy makers there is an opportunity for structure training, which could be certified by an awarding body. Employees, irrespective of their industry would then have a baseline qualification in assisting disabled people. This could then be enhanced for the specific details relating to the rail industry. MACS also strongly recommends that any training be co-produced and delivered by disabled people with a wide range of disabilities and requirements.

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, and the refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?

MACS agrees with the proposed timescales and recommends standardised training components which should comprise the major element of training for all operators. Operators, however, could add complimentary good practice training in addition to the standard modules.

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?

MACS welcomes proposals to raise awareness of rail assistance available. The proposals need to be part of a package of awareness raising. We suggest that an additional awareness raising opportunity is linking with Blue Badge enquiries. MACS believes that awareness raising of passenger assist as part of disabled rail card enquiries would be beneficial. This awareness raising should extend to enquiries and applications for concessionary rail travel cards too, for example in Scotland, the Scottish Blind Travel Pass, and elsewhere in the UK, where concessionary rail schemes are offered. We should be aimed at people who may qualify for, but who do not currently make use of concessionary travel or assisted travel services. It is important to note that people who are disabled may not identify as such and thus may needlessly struggle when travelling by rail.

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?

MACS welcomes this proposal and advocates that it should be mandatory to work with the stated groups. Without this mandate, working relations would be haphazard and not comprehensive.

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

MACS supports this proposal and would encourage ORR to require operators' websites meet W3C compliance at level AAA. Technology has moved on considerably over the past decade and with this has come a plethora of different terminology. The current proposals are a once in a decade chance to make travel information and travel inclusive, so prescriptive terminology is essential. Currently essential aspects of many operator's websites are inaccessible for people who use screen readers, such as journey planning, and, in some cases, the form for requesting rail assistance.

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

MACS supports the aspiration to have as minimal a notice period as possible for requesting assistance. It is important, however, to work with the industry and not to place unreasonable demands on it. On this basis, in the first instance we would support a six hours before travel option. However as some operators already offer a two hour minimum period of notice then research should take place with these operators to understand how they facilitate this offer and investigate whether this standard could be replicated across operators. Passengers need to be clearly advised as to whether the notice period applies only within business hours of booking offices operation when booking offices are not 24-hour services, or whether the notice period means booking six hours prior to the journey occurring. MACS would like to reiterate that for disabled people to equitably enjoy their economic, social and cultural rights on the same basis as non-disabled people, operators ought to also support, or investigate the potential for 'spontaneous' travel and requests for assistance that have not been booked. This is provided by London Underground, Glasgow Underground and (informally) Scotrail, and all operators should be able to provide this service.

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

MACS would support implementation by end of 2019 or at the earliest opportunity thereafter. As outlined in the consultation document, a range of notice periods exist and we recommend that shadowing and research is undertaken with the operators that currently offer the most minimal notice periods, so that this service can be replicated.

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?

MACS asserts that the same standard of assistance should be available irrespective of whether the journey relates to one or multiple train operators or modes. If the rail network is to give confidence to a disabled traveller, that person needs to be sure that there is assistance available across the whole of their journey, they need to know if a train has been delayed or if a disabled toilet is not available. This service can only be provided if staff are available to provide it. The Guidance should therefore describe the provision of staffing required to meet a need for inclusive travel and be cognisant that for many disabled people, provision of information about delays and cancellations needs to be offered in various formats, ideally in person by staff, and not just through visual display screens or through help points at unstaffed stations. For example, a help point is only useful for a visually impaired person if they know where it is located, or to a hearing impaired person if there is a visual screen, or to a wheelchair user if it is

not situated at the top of stairs. The presence of rail staff also increases confidence and is likely to deter anti-social behaviour and hate crime.

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

MACS is very supportive of this proposal. All too often assistance failures occur, as outlined in the consultation document. These failures are inconvenient for disabled people, often result in additional costs being incurred whilst completing their journey and do not encourage them to travel by rail. A system of redress could be introduced along the lines of the 'delay and repay' scheme where disabled people would automatically be entitled to compensation if their booked assistance does not materialise. As stated above concessionary rail travel is provided in many parts of the UK, and where this exists operators should be required to financially compensate disabled people when they fail to provide agreed assistance, irrespective of whether the person has had to pay for their travel or not. This right to redress should be highlighted in the passenger leaflet and prominently on operators' websites. To facilitate rail operators with aiding and preventing the need for redress, the advice provided to disabled passengers by the rail booking system needs to be more helpful and specific. For example the online booking system regularly advises the disabled person to make themselves known to rail staff at the station 20 minutes in advance of travel. Identifying rail staff is somewhat challenging for visually impaired people using an unfamiliar station or for people with any impairment visiting a large busy station.

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?

MACS recommends that text relay should be available across the network. The only barrier is where the mobile signal is weak, but a web-based alternative should be made available and accessible via a wide range of devices, including those running older operating systems.

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

MACS very much welcomes consideration in the guidance of replacement alternative travel that is accessible. MACS advocates that if a network is to utilise alternative transport because of planned disruption, that disruption event and the associated measures should have an Equality Impact Assessment (EQIA) undertaken as part of the planning. In this the need for accessible alternative transport should be clearly identified and put in place.

In addition a rail provider should have an Incident Plan, which identifies what is to be done in the event of an incident. Again, this should identify accessible transport providers and a shadow contract should be in place to ensure a business link between the 2 parties.

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?

From both an inclusive travel and safeguarding position, the Guidance should make this mandatory.

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?

MACS supports the recommendations, but would like to see something about carriage of larger scooters in the goods train if available (this must be pre-booked).

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.

MACS would like to highlight that inclusive travel is for everyone and wheelchair users and others that need additional space, for example people travelling with assistance dogs must be catered for in the design and layout of both standard and first class carriages, so the Guidance should reflect this.

If practical, operators should inform disabled travellers of any issue with accessible toilets at the earliest opportunity, should advise them of alternative travel options and should make arrangements to assist passengers to continue their journey as per their choice.

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

MACS believes that the guidance omits including the need for clear announcements and alternative display of the announcement in British Sign Language at either stations or on board.