

Rail Delivery Group

Response to DFT's Draft Accessibility Action Plan

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Rail Delivery Group response to consultation: Draft Accessibility Action Plan

Organisation: Rail Delivery Group

Address: 200 Aldersgate Street, London EC1A 4HD

Business representative organisation

Introduction: The Rail Delivery Group (RDG) brings together passenger train operators, freight train operators, as well as Network Rail; and together with the rail supply industry, the rail industry – a partnership of the public and private sectors - is working with a plan *In Partnership for Britain's Prosperity*¹ to change, improve and secure prosperity in Britain now and in the future. The RDG provides services to enable its members to succeed in transforming and delivering a successful railway to the benefit of customers, the taxpayer and the UK's economy. In addition, the RDG provides support and gives a voice to passenger and freight operators, as well as delivering important national ticketing, information and reservation services for customers and staff. taxpayers and the economy. We aim to meet the needs of:

- Our Members, by enabling them to deliver better outcomes for customers and the country;
- Government and regulators, by developing strategy, informing policy and confronting difficult decisions on choices, and
- Rail and non-rail users, by improving customer experience and building public trust

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¹ *In Partnership for Britain's Prosperity*, RDG (October 2017):
<http://www.britainrunsonrail.co.uk/files/docs/one-plan.pdf>

Overview

Addressing the needs of disabled and vulnerable people is a key part of mainstream railways policy. Future investment in new infrastructure, trains, ticketing and information technology will take full account of *all* customers and their specific, individual needs.

Significant investment has already been made over the last few years and access to the Railway for *all* our customers has improved as a result;

- Over 9,500 accessible rail vehicles now in circulation (circa 75% of all rail vehicles)²;
- over £500m in station improvements through combination of Access for All funds, and minor works (not including new stations funds)
- in journey terms over 70+³ of rail journeys taken in the UK today are through stations who provide step free access to platform

As well as improving infrastructure, train companies employ almost 50% more people than they did 20 years ago and this includes staff to help customers. The introduction of Driver Controlled Operations (DCO) for example, allows the staff on board the train to focus more time purely on supporting customers.

However, compared with an estimated 16% of the adult population having some form of disability, only 9%⁴ are currently using Rail, and we recognise spontaneous travel remains difficult or impossible for many disabled people.

What are we doing about this?


Rail companies recently set out their plan "*In Partnership for Britain's Prosperity*", to work together to change and improve the railway, now and for the long term. Under this plan, £50+ billion of investment will be made to transform our railway over the next 10 years giving us the opportunity to place 'Access and Inclusion' at the center of that investment, not on its fringes.

Our customers want and deserve easy travel from door-to-door and our aim is to enable that for all, irrespective of need. To do that we must offer a personalised service based upon a comprehensive understanding of our customers. Our Customer Promises, shown below, demonstrate our commitment to transformational change. They apply to all customers and not specifically to those requiring support through the journey.

² <https://www.gov.uk/government/publications/list-of-rail-vehicles-built-or-refurbished-to-modern-accessibility-standards>.

³ Based on footfall figures through stations.

⁴ Based on proportion who identified themselves with a Disability in 2016 NRPS survey.

Put the Customer IN CONTROL	Let the Customer TRAVEL MY WAY	Enable the customer to be ALWAYS ON	Give the Customer CLEAR VALUE	Ensure that the customer is always FEELING LOVED
				
<p>"I always know what's happening before, during, after my journey so I can make informed choices & decisions"</p>	<p>"The train company understands and appreciates me, offering me services that meet my individual needs"</p>	<p>"My train journey keeps me connected from one part of my life so that it's not interrupted"</p>	<p>"It's clear what I'm getting from my money and I feel that pricing is straightforward"</p>	<p>"I feel the train company values my custom and recognises my loyalty"</p>

Our Accessibility and Inclusion vision for the industry, endorsed by RDG Board, sets out 4 key aims and objectives:

- To move progressively towards a fully inclusive railway, with well-defined and appropriate interventions that support customers through their end to end journey, tailored to meet their specific needs.
- To promote greater confidence in rail as a mode of travel, enabling more spontaneous travel.
- To remove the "label" of accessibility by delivering on our Customer Promises and by ensuring requirements for all customers are considered from the inception of all projects & programmes.
- To ensure our organisation and our culture embraces diversity and inclusion

And we are well underway with this agenda:

- By January 1st 2020, our rolling stock will be fully accessible. New Trains will have more intelligent on board 2-way information systems; real time reservations and real time access to the condition of facilities to better inform customers
- Our planned new Passenger Assistance system due towards the end of 2018 will offer a more integrated end to end service, including shorter booking times, integrated online ticket purchase, and information alerts to support customers and staff during disruption.
- Our widely publicised 10-point Action Plan for Information on Rail Fares and Ticketing will tackle complexity of information associated with fares/tickets and will actively engage with DPTAC
- And recent announcements by the Secretary of State regarding his Statements of Funds Available (SOFA) Network Rail will hopefully ensure the desire to extend Access for All funding can be realised.
- The industry is working with the ORR to develop policy for the staffing of stations and trains. The aim is to ensure we deliver the best experience for our customers

balanced by a pragmatic approach to staffing both at stations and on-board. The policy will recognise that on many of our trains, the operation of the doors is best conducted by the driver meaning that where a second crew member is deployed they can focus, rightly, on customer service. This is important, especially for customers with accessibility requirements, who should feel confident to travel independently.

Taking this more inclusive approach, we believe can benefit ALL customers and working as ONE Railway, we believe we can get there faster.

The consultation response

The Rail Delivery Group (RDG) welcomes the opportunity to contribute to the DfT's Draft Accessibility Action Plan and our detailed responses are outlined below, representing the views of RDG and its members. Some owning groups will supplement this wider industry response to ensure specific issues relating to their operating environment and challenges are given the necessary focus.

Our response primarily concerns the rail elements of the plan so does not include actions relating to other areas or consultation questions directed at customers or groups representing users.

Paul Plummer

Response to Specific Consultation Questions and Actions

Section 4 Consistency in Accessing Transport Services

Tactile Paving

Action 1: *We will commission a research project to scope the updating of the 'Inclusive Mobility' guidance by the end of summer 2017. As part of this project we will also examine updating our guidance on the use of tactile paving surfaces. We will then consider the recommendations and determine a way forward.*

We would welcome this action given the guidance was last published in 2005, but recommend this goes beyond guidance on just tactile paving at the same time as using it as an opportunity to cross reference with other relevant guidance DfT produces, to ensure the various guidance documents are consistent and aligned.

In terms of tactile paving specification, within the scope of the new guidance it would be prudent to confirm at what point the requirement to install platform tactile applies, given there has been challenge to the Network Rail standard on this issue. By way of example, if major building works take place on a platform, is it appropriate to only install tactile on that platform or should it be all platforms at a station. Creating inconsistencies for customers with a visual impairment is potentially more problematic than having no tactile at all.

It would also be sensible to harmonise or standardise how such paving is used as the role of such paving is different between highways (where it is used to denote a safe crossing point) and on railways where it often used to denote a change (dropped curb, platform edge etc.).

As above, we welcome this action, but wish to stress that any recommendations or

Action 2: *We will continue our involvement with CIHT on their work on shared space. After we receive their report by the end of 2017, we will consider the recommendations and announce how we will take them forward.*

guidance that is produced, is part of a bigger and wider ranging document that tackles the *whole* environment in which stations sit, not seeing them in isolation. It has been a challenge to scale back on the demands of local councils for shared space schemes around stations particularly because they themselves have not engaged meaningfully with local disabled people.

There should also be an ongoing and watching brief at the DfT to monitor other such innovative developments in public space which can clearly lead to disabled people being left isolated and marginalized. Recent introduction of 'art installations' on pelican crossings in Southwark Street London are an example of a new approach being introduced overnight with no consideration of the impact on disabled people.

Action 3: *We will refresh our guidance in Local Transport Note 2/08: Cycle Infrastructure Design to ensure that local authorities can continue to design good, safe and inclusive schemes that work for everyone in accordance with legislation.*

Given the demand for more sustainable transport this is welcome, and reference should be made to the following RDG guidance:

https://www.raildeliverygroup.com/files/Publications/2016-04_cycle_rail_toolkit_2.pdf

What needs to be carefully considered, however is the additional demand this can place on space in the train. Customers wishing to travel with bikes often take room up in the wheelchair space on a train, potentially impacting on the safe transport of wheelchair users. Even Brompton style bikes in their *folded* state can be impossible to store in the overhead luggage are or in luggage racks on trains if they have any. They are also often too big to store behind seats etc. and can frequently be found 'chained' onto grab rails in door vestibules making them a hazard for all other train users but especially disabled people, those with visual impairments being particularly vulnerable to walking into them.

Although we would support promotion of cycling to stations we feel that the expectation that these can continue to be absorbed onto trains, especially in the peak, is unrealistic and innovative ways should be found to both increase secure storage at stations but also to look at how people can make onward journeys from their destination station without needing to take their bike with them like a free lend scheme for bike owners at the other end of their journey (mainly major terminals)

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.*

We believe that the DfT should go further than buses and should review all options for "first and last mile" travel. The approach, at the very least, must consider the interchange part of their journey between rail and bus/mode so that this works more fluidly. Customers are increasingly exposed to multi-modal options for door-to-door travel and RDG are keen to work with the DfT and lead the industry to enable this service.

We would like to see far wider availability of wheelchair accessible taxis outside of London. Often for inaccessible stations this is the only way we can get a wheelchair customer to an

Action 5: *We will review and consult on best practice guidance for taxi and PHV licensing authorities, which will include strengthened recommendations on supporting accessible services, including on the action that licensing authorities should take in response to reports of assistance dog refusal. This guidance is expected to be published in 2017.*

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.*

accessible station yet this can result in lengthy waits for the customer as it can be particularly hard to find accessible taxis especially during the evening/night and over the weekend (we can also need taxis when we have engineering works on so this causes additional delays for disabled customers who are not able to use a replacement bus).

If the availability of wheelchair accessible taxis cannot be improved through legislation then perhaps other incentives should be considered, like free taxi permits, relaxed picking up rules etc. to increase the availability.

Railway Station Improvements

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.*

The Access for All programme has delivered considerable benefits for disabled rail users across the UK. It has enabled disabled customers to travel more confidently, with improved access to services. With that said we would welcome some much-needed clarity on when the schemes which were deferred from CP5 into CP6 will now be delivered. In addition, the reintroduction of the Small Schemes Fund (C£500K) would enable the industry to utilize technologies to overcome accessibility issues that might otherwise require building works.

We would also encourage transparency into the selection of stations and proposed upgrades to provide confidence to disabled customers around the country that the targeted areas of investment will deliver the greatest impact.

We would ask for consideration into improving the access level at a potentially greater number of stations to a standard which might fall short of full Access for All, but nonetheless significantly improving the number of people able to access the railway as a result. We would suggest at the same time, the Department considers a review of the current accessible design standards for stations to ensure they factor in any lessons learned from previous Access for All developments and any current thinking on usability design to ensure future Access for All Station development factor in this latest thinking

Truly improving the independence of mobility impaired customers, given the number of stations which are unstaffed for either the whole of, or part of, the day, requires us to also mitigate issues which continue to make *boarding* our trains difficult, an issue which exists regardless of how accessible the station itself is. While we agree network wide level boarding is an unrealistic goal, we would nonetheless ask the DfT to consider within the scope of any future Access for All funding, specific station improvements which ease the ability of customers to board the trains from the platform. For example, improving signage and platform markings which indicate the best point to board the train – this has related performance benefits as less delay is introduced boarding the customers.

RDG is also championing the development and pilot of a 'near-to universal' ramp which will go some way towards mitigating the issue of having the *right* ramp available at stations, and we will also review the feasibility of automatically deployed ramps. This latter point obviously presents a much longer-term opportunity but would still require the right investment and signage on platforms which we could start to tackle now as part of the proposed extension to Access for All.

We would also want to take the opportunity to add that the scope for the Minor Works Budget, specified in rail franchise agreements, is unduly limiting and can result in sub-optimal initiatives being delivered. We therefore propose that the scope of activities this

budget can be used for, is broadened to address the hole left by the removal of the Small Schemes budget in recent years. As an example, that fund could be invested in new technologies rather than just in physical building works. See the use that could be made of Small Schemes fund to support and accelerate the improvements identified in **Actions 9-16**.

Section 5 Monitoring Impact of Regulatory Compliance

Improving accessibility and customers experience on board trains

We are committed as an industry to improving the travelling experience of people with disabilities using facilities on our trains and stations and have considered all the below actions in our response to this section of the consultation

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).*

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.*

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 info on the research is provided in Section 7 Spontaneous Travel).*

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 – e.g., if the only accessible toilet on a train goes out of use*

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.*

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

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.*

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

In terms of **Action 9 (Funding accessible toilets at stations)** we support any activities that

will bring additional investment to our train stations but would want customer insights and data to drive the selection of those locations.

In terms of **Action 10 (Pilot of Improved CET Tanking)** we have conducted an initial study across a substantial portion of the UK network and different fleet types and understand in aggregate the key issues contributing to the availability of toilets on-board trains. Some emerging best practice has been identified including some possible opportunities to improve the performance of CET toilets which represent now almost 90% of the toilet types fitted on board and subject to confirmation of any potential DfT pilot funds available, RDG has identified some possible sites for deployment of additional mobile tanking facilities, to supplement the current fixed install base.

It is worth noting that the time to tank a train is as important a consideration as having the physical capabilities; while we may have the facilities, we may not have the capacity in the timetable to tank a train. Virgin Trains East Coast (VTEC) has carried out a lot of work on this issue at Edinburgh Waverley in recent months as the Highland services (Aberdeen/Inverness to King's Cross) often had issues with water supplies being exhausted before the end of the journey. There will be learnings here to factor into the pilot study which VTEC are happy to share.

We have also presented the challenge of 'on board toilet availability' at 4 of the recent Innovate UK AiiR5 innovation competition events, outlining the problems with CET toilets. A representative from DfT's Innovation team is a member of the judging panel and we would hope to understand through their involvement what potential funds might be allocated to innovation opportunities in this area. Improving sensor technology and looking at ways to reduce water consumption were 2 areas we would welcome some innovation bids.

Additionally, we have committed as an industry to pilot a standardised way of monitoring and measuring performance of toilets on board our trains and will aim to commence this pilot with 3-4 TOCs in December 2017, running it as a trial for 6 months. This standardisation of performance measurement, which does not exist today, will enable us to establish appropriate benchmarks and associated target performance and SLAs with maintainers. It will be important for teams in the DfT who have an active role in the procurement of and management of certain new rolling stock contracts (the new IEP trains for example) to support this work through those contracts.

In terms of **Action 11 (ORR publication of Accessibility and Assistance Performance)** RDG have been actively involved in supporting the data collection for the ORR study into Assistance provision and look forward to analysing the results and recommendations. As DfT is aware, we have already embarked on a programme to replace the current system that supports the booking of Assistance, both pre-booked *and* un-booked assistance ("turn-up-and-go" or TU&G)), and this research will be invaluable to assuring the improvements we make truly target those areas which represent issues for our customers.

We will work with the ORR research partners to help define a clear customer proposition for TU&G, from benefit statement through to detailed delivery commitments, which will better meet the expectations customer have. Work is already underway on the creation of an industry "charter" for TU&G, which this research will be invaluable in terms of helping us refine. We will provide customers with a reliable and consistent experience whether they

choose to pre-book or not, and setting clear expectations up front of what to expect in either case, is an important part of achieving that ambition.

Action 12 (Alternative Journey Options for Passengers), is an essential outcome we will deliver. The process to inform customers, in advance, of on-board services exists today but the reliability and timeliness of that information is not good enough. Toilets are a specific issue, as is the information on availability of wheelchair spaces on incoming services, which if made available to station staff would be hugely helpful when assisting customers onto trains.

As part of its continued investment in real-time customer information, RDG is in the process of updating Darwin, its real-time train running information feed, to enable the inclusion by TOCs of data relating to the operational status of their on-board toilets. A pilot will commence by the end of this year, which looks at displaying this information via the CIS screens at stations. Longer term this will enable TOCs (and 3rd party developers) to update any relevant Customer Information touchpoints, including the Passenger Information System (PIS) on board trains, journey alert services, and through the new Passenger Assist Staff and Customer Applications (due the end of 2018). These new Apps will also include a facility for both customers and staff to report defects with facilities on board the train and at the station, improving the coverage and timeliness of issues reported.

The inclusion of this data into the industry information feeds will improve understanding by both Staff and Customers of the status of the accessible facilities on our trains in advance of boarding a service. Being part of the industry information feed as opposed to localized to each TOC, will mitigate the issue when staff help customers onto another operator's trains, who may today not be aware of issues being reported to only that operator's staff.

Until all trains and toilets are fitted with remote condition monitoring systems however, it will be difficult to truly *guarantee* that information being made available to all customers (and staff) as soon as a problem occurs.

In terms of **Action 13 (Train Facility Alerts on Station pages)**, we are exploring the possibility of placing dynamic messages regarding the real-time status of facilities at stations on the Stations information pages (Stations Made Easy section as relevant) and our response to Action 12 outlines our approach to the status of on board toilets. We don't believe it is relevant to place the status of on train facilities on the Stations Made Easy page as this specifically relates to the facilities at Stations. We would advocate for the provision of better information regarding accessible facilities on board at the journey planning stage and talk later in the response about plans for a more 'accessible' journey planning service that integrates relevant information in real time about the availability of facilities across the customer's journey, both on board and at station.

Finally, in terms of **Action 15 and 16 (Innovation funding)**, we welcome the results of this (and any other) competition and ways to make use of any associated innovation, when considering improvements being made through our Minor Works, NSIP budgets and some of the investment schemes proposed by this consultation.

We would however welcome a more *coordinated* approach between the various Innovation competitions, and improved transparency into what innovation is being funded. This is to ensure more value can be derived from the various schemes through more people being

aware of them, *and* to ensure we have mitigated the risk of possible duplication in the projects being funded.

Continuously improving the customer experience

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).*

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.*

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 requirements to comply with accessible rail vehicle standards.*

We will feed into the research proposed in **Action 17 (Research into Impact of Rolling Stock Improvements)** and highly recommend the OEMs, ROSCOs and Maintainers are likewise invited to do so. Given the changes have already been made we would see the primary value of any additional research into this area being focused on the rolling stock improvements that remain outstanding and actions needed to address any issues the research identifies.

In terms of **Action 18 (Performance data of Accessible Features on Trains)**, the scope of the performance data being proposed and the timing of when it would be possible to provide that, will need to be specifically consulted and agreed to as an industry, with the understanding that it is unlikely to be universally available by the proposed December 2017 timescale. Please note, plans in progress including timelines for the reporting of on board toilet data have already been outlined in response to Action 10.

In terms of **Action 19 (Sharing data from Action 18 with ORR)**, we would also expect to see a more detailed consultation regarding the role of the ORR in any wider performance regime reporting. A detailed set of DPPP indicators have already been established with the prior consultation and agreement of the industry. Any proposed change to those should be similarly consulted in and agreed, both in terms of scope and timing however to the extent this adds value, we are happy to work collaboratively with ORR and DfT.

In summary, our response to Actions 17 through 19 inclusive, are supportive of any improvements that enable disabled customers to make independent journeys more easily and confidently. However, we need to highlight that these provisions may bring about additional financial implications for our business and therefore appropriate mitigation should be considered with careful weighing of the costs vs. benefits.

Section 6 Training and Education

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 fully support any steps that help to improve the quality of disability equality and awareness training and recognise the fundamental role this plays to improve access to services for our customers. In particular, any work underway which we can leverage as far as how to best support customers with cognitive and mental health impairments would be very useful, as our understanding in this area is still relatively immature as far as the issues that creates for travelling by train.

Future Policy Development

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)?

As mentioned above, we welcome the role ORR (and DfT) can play in helping to ensure that the disability equality and awareness training we offer is of the highest possible quality, and that it reflects *all* forms of disability. It is important in so doing, that the Department, the ORR and train operators work closely with bodies representing people with 'hidden' disabilities, to improve our understanding of the assistance needs and challenges they face when using our services. This goes hand in hand with a potential role for these same organisations to play, such as training on using trains and working with operators to support 'try a train' days or something similar.

A formal accreditation approach to ensure consistency and quality of the training may be merited and we would be happy in conjunction with our Members to discuss this as a potential idea with DfT and ORR.

Section 7 Spontaneous Travel

Spontaneous Rail Travel

Action 26:

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

Action 27:

We will report on the progress of its joint research with Transport Focus, to identify the challenges inhibiting passengers from travelling, by the end of 2017

In terms of **Action 26 and Action 27 (Research)**, and consistent with our response to Action 11, we support the collation of research, to complement the research we and our TOCs already undertake, and would want to consider any of the recommendations it is reasonable to make. We particularly want to ensure our plans for a new Passenger Assist system adequately reflect this latest piece of research, as well as feed in to the development of our turn up and go offer, leveraging and standardizing as best practice the good work already done by TOCs such as GTR.

From an industry standpoint, it would be helpful to ensure this insight is also used in future to inform more standardized outputs from the franchising process which just helps ensure improvements can be more consistently embedded in.

How the reports are published will also be of huge significance; they should celebrate the good at the same time as highlight the issues, so customers are encouraged to *try* rail rather than being frightened off travelling. If the focus is always on the issues and the negatives, we will not achieve the aim of more people using rail.

Building on this point, we would ask that the research and any findings and recommendations are contextualised to reflect the challenges and constraints of rail operations, especially those that operate in rural areas, so that effective yet appropriate actions can be developed. One solution will not be applicable to all operators or types of operation.

Consultation Question 9:

As a transport operator or provider, what is your experience of enabling spontaneous travel for disabled people?

- What steps have you taken to enable spontaneous travel for disabled passengers?***
- What action could Government, regulators or other bodies take to help support you to provide spontaneous travel for disabled passengers?***

The ability to travel spontaneously and how easy that is, depends on many factors, not just the specific level of accessibility of the rail journey. For many customers', not just those with a disability, the issue pertains more to how easily they can get to and/or from the station, how suitable the location of the station is in relation to their end destination, and how accessible the onward transport is. Improving the integrated nature of our accessible transport network therefore is key, but is a challenge no one operator can tackle, and needs to rely on investment and transport integration policy at a local/regional and national level

In terms of how accessible the rail journey itself is, this again very much depends on the type of disability, what form of assistance is needed and whether it can be provided based on the level of accessibility at the station, by staff if available at the station or on board the train, as well as the layout of the given rolling stock. Many customers do indeed travel successfully every day on our network without any booked assistance, but we acknowledge more needs done in terms of awareness, and reliability of the service to build confidence with customers that we will ensure they can travel and the experience when they do is as seamless and relaxing as possible.

In terms of rolling stock, we are on track with the support of Members and Government to having all the legacy, NON PRM-TSI compliant rolling stock upgraded or replaced by the end of 2019. The platform to train interface remains a challenge in the absence of level boarding and given the wide range of different rolling stock which runs on our network. To ease this, an innovation project sponsored by RDG for a "near to universal" ramp has passed proof of concept stage and will be entering a Pilot phase by the end of the year, with several operators and Network Rail interested.

In terms of station and platform access, this has greatly improved in recent years due to the investment made through refranchising and schemes such as Access for All. While the total number of stations reported as fully Accessible, is itself relatively low in percentage of total station terms (circa. 21%), that percentage is much higher when considered in total rail journey terms (circa. 70+%). The sector recognises that more stations need to be made more accessible, especially in rural areas, and so we welcome the plans to expand the Access for All scheme. (Please refer to the response to **Action 8** for our more specific feedback in relation to station improvement)

While every TOC has an obligation and a process for providing a means of travel for anyone with a disability, regardless of whether they have pre-booked or not, any level of notice from customers of an intention to travel, does help to ensure the right support is available when required and we can guarantee a seat or space on the train. In the absence of pre-booking, a reasonable endeavors approach tends to be the best a TOC can support in the absence of a booking. Not dissimilar in fact to the advice we give *any* customer who wishes to ensure they have a seat i.e. book in advance and staff already struggle today on some services to safely accommodate the number of wheelchair users who have quite rightly been encouraged to turn up and go.

With the new **Passenger Assistance System**, which we plan to introduce in late 2018, we are working on making pre-booking a much less onerous experience for customers, both in terms of the booking process itself, and how far in advance that booking is required. Many train operators are already committed through recent Franchise awards to shortening the amount of time required to book assistance in advance, bringing that down in some cases to no more than one hour. The new system will also improve the tools and information for customers and the staff supporting them who turn up and go.

Supporting the introduction of the new system, we are also working on a **cross Industry 'blueprint'** for how we assist customers on the day, catering for all operating scenarios, including the more straightforward pre-booked assistance via a fully staffed station and train, through to a turn up and go scenario at unstaffed stations or trains. The intention is to standardise our provision of assistance around identified best practice, knowing that a lack of consistency from one operator to the next can confuse customers. This will include how we support reservations for companions and carers.

We have recently improved the information provision on our Stations Information pages regarding which stations provide a more seamless **"turn up and go service"** due to being staffed from the first to last train and being step free. This saves the customer picking through the detailed facilities listings to work that out. We will work with the ORR and using the research findings from their turn up and Go mystery shop to improve this, outlined earlier in our response to **Action 11**.

Other, slightly longer-term plans in this space, include the introduction of an industry first **Accessible Journey Planner** which integrates the information regarding stations and facilities (in real time) and would allow customers to tailor their journey plans around their specific needs. This takes us to a view of how accessible journeys are, not just how accessible our stations or our trains are. This also mitigates the risk of customers

attempting any 'spontaneous' journeys to and from locations that are simply not suitable without having provided some prior notice of intention to travel.

To enable us to do this "at pace" and with the whole industry acting in concert, we would wish to see the Government re-instate the Small Schemes fund which has enabled RDG in the past to push through investment targeted at information and technology improvement, while minor works and access for all schemes tend to focus on infrastructure and facilities enhancements. A disabled customer's lack of ability to spontaneously travel is often a perception, not a reality and we need to ensure the information on the accessibility levels of our stations and trains is just as easy to access as the stations and trains themselves or that larger investment in making our infrastructure more accessible will fail to achieve its full potential.

Passenger Assist

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.

Action 29:

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

Our earlier response to **Actions 12 and 13** outlines our support for this approach and general feedback in this area. It would be worth re-iterating here, however, while we support this and are happy to confirm that many operators already do this today, it is essential that anything agreed to as an industry, on standardizing this, nonetheless retains the ability for operators to make appropriate decisions about what is a suitable alternative based on their local circumstances, hand in hand with the preference of the individual customer. As already said, there will not be a one size fits all nor a universal definition of what suitable means. If the issue is a lack of a toilet on board the specific train, offering a taxi which also has no toilet, does not solve the problem, unless the next available train with a toilet is going to be an unduly long time etc.

Section 8 Building Confidence and Empowerment

Information on rights

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 service and facilities, as well as developing easier ways to register complaints when things go wrong.

The work on DPPPs, Complaints Handling Procedures and The Consumer Rights Act in recent years by train operators and the ORR will intuitively have increased knowledge of

consumer rights, including by customers with disabilities, and we will continue to support any reasonable recommendations on ways we can further improve this, including any from the afore-mentioned ORR research. It may however also be appropriate to focus on inconsistencies between operators, contracted during the rail franchising process, and address these through future franchise awards. With consistency, customer knowledge will hopefully improve.

With our new Passenger Assistance System coming in towards the end of 2018, we will have the opportunity to re-promote the availability of Passenger Assistance services, the existence of which, we know from our own research, is not widely known. This goes hand in hand with ensuring it is clear who the Assistance service is intended to benefit, vs. it being confused for a general 'porter' service, as has been the case in the past. With the aim to promote this more widely, we need to ensure that promotion is targeted to the right audience and we can benefit those customers and future customers who really need and would benefit from this.

In terms of making it easier to complain about poor service, between the work that has already taken place with ORR and with the planned introduction of a Rail Ombudsman Service, we feel this is being tackled, and so would need more information in what is specifically intended by DfT in relation to this point before we would feel able to comment any further.

Information on accessibility levels

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.

We welcome this action and see a clear role for the re-introduction of the Small Schemes fund to support developments in this area, working alongside the various infrastructure funds which target enhancement to the infrastructure and assets themselves.

The Small Schemes fund in the past has successfully funded the introduction of the Stations Made Easy service on National Rail Enquiries, which is already in need of being overhauled. Enhancements in technology now support much better online **station navigation and wayfinding** tools, enabling customers to familiarise themselves with the station environment ahead of travel. Being able to provide that level of visual information *ahead* of travel may make the difference between someone feeling confident about travelling or not. As already mentioned, we are also working with TOCs on ways to make relevant accessibility information available in real-time (e.g. if a facility unexpectedly goes out of service), rather than just listing what facilities or services are present, and will be advocating for development of an Accessible Journey planner that could integrate *across* all relevant public transport modes, providing all the necessary and tailored information for customers travelling with some form of disability.

Disabled Persons Railcard

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 it's take up and use.

We fully support further promotion of this Railcard and a refresh of both the website and the leaflet literature is already planned and underway. Disabled people currently travel on average 5 journeys a year whereas Disabled Persons Railcard Holders travel on average 31 times per year (single journeys). While cards in circulation has grown steadily, today we estimate only 21% of Disabled journeys are taken with a Railcard and with improved awareness of the 'offer', we can grow journeys and help more customers take advantage of the financial benefits associated with the discounted travel.

We are also happy to work with DfT on a review of the current qualification criteria for Disabled Persons Railcard (DPRC) which includes an unpublished second level qualification criteria which we would support being made public as part of first level qualification criteria. This includes as one example only, someone living with Dementia. This would make it clearer and more transparent to both customers and staff, regarding who is entitled to what, and eliminate some of the confusion which the 2-tier system has introduced.

Promotion of the DPRC must of course also be balanced with the availability of accessible facilities.

National Assistance Card or other assistance for people with less visible disabilities

Consultation Question 14:

As a transport operator or provider, 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 might find helpful in responding. However, the questions are not exhaustive and you should not feel restricted by them:

- **Do you currently offer an assistance card, badge, lanyard or other tool to enable passengers with hidden disabilities to alert your staff to assistance needs?**
- **Do you have any views on the merit or not of introducing a national, cross-modal assistance card?**
- **Are there any practical or other considerations needed for the introduction of a cross-modal national assistance card?**

We would support the introduction of a national card scheme and see real merit in their use. Customers often travel with one or more other operators/transport modes so would otherwise need more than one card, if not several! This would also simplify things for staff

who already struggle to recognise the numerous existing badges, cards, bands etc. Many TOCs have adopted the Blue Assist card and in Arriva Trains Wales they have adopted the Orange Wallet scheme. The Orange Wallet, originally funded by the Welsh Government, has been in existence since 2014 and is used well across the network. The wallet is a communication tool, which can be used by people who sometimes find it difficult to communicate their needs to staff when using public transport. The wallet contains space for the user to insert written and/or visual prompts to show the conductor, station staff or when buying a ticket at a booking office. This has recently been rebranded to cater for people with all disabilities that may find it useful, not solely for those with hidden disabilities.

The wallet is recognised by staff across the Arriva Trains Wales and Great Western networks, and by major local bus services including First Cymru, Stagecoach, Cardiff Bus, Newport Bus and Arriva Bus so we already have the makings of a national cross-modal card in existence.

The introduction of such a scheme would require agreement with Operators of all modes of transport and local authorities, including a plan to phase out any existing cards to ensure those do not continue and cause confusion for customers.

Travel training, buddying and mentoring schemes

Action 33:

We will continue to identify and support initiatives for promoting and supporting travel training, mentoring and buddying schemes.

We manage these schemes, conscious of the impact on resources, but as an industry, we recognise their value and will continue to support them. As RDG we support Inclusive Journey Experience days and have covered the full range of disabilities to inform our thinking and investment priorities *and* help advocacy groups understand ways to help the customers they represent travel more confidently on the railway.

Advice on when to stop driving

Action 35

Over the course of the next two years, Mobility Centre 'hubs' will promote the public and private transport options available in each region to those considering giving up driving or those who have been advised to cease driving.

Action 36:

By the end of 2018, Driving Mobility will produce guidance to support families concerned about an older person's driving ability, along with information on alternatives to self-driving

While not the direct audience for **Actions 35 and 36 (Mobility Centre Hubs and Guidance)** we would nonetheless see any development of advice on when to stop driving, an opportunity to promote the existence and benefits of rail travel as a potential suitable alternative, including promotion of the Disabled Persons Railcard to access more *affordable* rail travel, and the availability of Assistance services. RDG can play a role in conjunction with DfT and the providers of Mobility Centre 'hubs' in developing, as one possible idea, a formal 'Suitability for Rail Travel Assessment'. This would relate the person's specific disability and mobility patterns/needs with the availability locally of suitable rail travel facilities to ensure a good 'fit'.

Mobility scooters

Action 37

We will work with Mobility Centre's 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.

Operators are increasingly aware of the challenges of accommodating mobility scooters, especially on heavily loaded services, and frequently find themselves having to balance competing needs for on board space (particularly on occasions when multiple wheelchair/scooter users wish to travel on the same train).

Policies regarding scooters vary widely across TOCS (e.g. the need for permits) and this can cause confusion for customers and staff. The design of scooters also varies widely, which provides a significant challenge for staff/customers understanding which scooters we can accommodate.

We believe as an industry we (through RDG) should be providing clear information to scooter users, so expectations are clear regarding all aspects of their use – safety on platforms, boarding procedures and guidance for space on trains. We therefore welcome both action 37 and action 38 as ultimately any approach which helps to provide clarity to users regarding the suitability of their scooter for rail travel would be welcome.

In terms of **Action 37 (Training for scooter users)**, we support this approach. It may also prove useful to consider some form of registered training which must be completed before hiring scooters to the occasional users who may not be as familiar with their operation.

Finally, in terms of **Action 38 (identifying suitable scooters for public transport)**, we fully support this activity but suggest that it does not go far enough as significant consideration needs to be made of the use of mobility aids on trains which are appropriate for use in small, confined areas and with appropriate maneuverability while not putting other customers or staff safety at risk. Some form of national scheme for rail for example would

bring clarity for users and staff. Alternatively, a national kite mark could achieve the same benefits. RDG would be willing to take the lead in this, however, support from the DfT and the ORR would be paramount for its success.

Section 9 Strengthening our Evidence Base

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 to 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.

Generally, we support any research that helps ensure Government funders, transport operators and policy makers understand the problems and the opportunities better before identifying effective solutions. As RDG we have carried out a series of Inclusive Travel days with customers who suffer from mental health impairments and cognitive disability and they now form part of our wider RDG-AG Governance. We are baking the learnings from those Days into the development of our new Passenger Assist system as well as informing our wider work as an Industry for Ticketing and Information. By solving the typical problems experienced by this group of customers, we can unlock Rail to a much wider audience who find Rail too complex and as a result 'inaccessible'.

In terms of **Actions 40 (research to better understand barriers to travel)** we fully support this study and would see it as a crucial first step in the development of any National Assistance tools targeted at this specific set of disabilities (see response to consultation question 14).

Likewise, **Action 41 (the economic study)** this ought to be timed in such a way as to inform amongst other things, extension of the Access for All programme indicated in Action 8, and used to help secure that vital ongoing investment.

Innovation as a tool for accessibility

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.

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.

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 on transport user:

As already indicated in our response to **Actions 15 and 16 (Innovation funding for Accessibility in Rail)** we support any mechanism that achieves additional funding for improving the accessibility of rail services, whether through specific targeted competitions, or by ensuring any innovation competition includes some form of Disability Impact Assessment. The RDG Programme Standards Office (PSO) is rolling out a new framework which will require all RDG projects and programmes to perform this type of Assessment.

Section 10 Inclusive Policy Making

Action 46:

We will work with the Welsh Government and the Minister for Equalities to understand the impact of the introduction of these new powers in Wales, and their potential applicability to the English jurisdiction.

Action 47:

We will support work with local authorities to raise their awareness of the Public Sector Equality Duty under the Equality Act 2010 in relation to local transport and transport facilities.

We support this approach and are looking forward to working with the Welsh Government and Minister for Equalities in this area, where applicable and appropriate.

Section 11 Measuring the Delivery of Outcomes

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 agree with this approach, on the understanding that the differences between transport

operators and providers, and the complexities of rail operations, are recognised and appropriately incorporated into any measures.