

Office of Rail and Road
One Kemble Street
London
WC2B 4AN
25 January 2018

Dear ORR

Assisted Travel Consultation

This submission is made on behalf of the National Pensioners Convention (NPC); Britain's largest pensioner organisation representing around 1m older people, active in over 1000 affiliated groups across the UK. The NPC is run by and for pensioners and campaigns for improvements to the income, health and welfare of both today's and tomorrow's pensioners. We welcome the opportunity to set out our views in this consultation and are very supportive of your statement "to empower confident use of the railway by all". Our responses are laid out below.

Chapter one - Raising passenger awareness

Q1. How can rail operators' improve the availability and promotion of Assisted Travel information in stations?

A simple way to do so would be to display. Large posters in prominent positions telling people they are legally entitled to free assistance when travelling, at all times trains are running. This could be backed up by a TV advertising campaign or information given to older groups, local forums and other places where vulnerable people might be. No doubt local press and local radio are good mediums if one wishes to contact older people.

Q2. Are there any reasons why passenger-facing documents should not be required to achieve Crystal Mark standard?

Whilst the DPPP which has to contain specific complex commitments, is usually worded very carefully in order to minimise the legal and compliance risk on the operator it is true to say The DPPP Guidance needs updating. Older people appreciate clear and concise communication and Crystal Mark may we'll be a good way forward.

Q3. What steps can be taken to increase website accessibility?

There is of course an obligation on all TOCs to meet website standards. The needs of older users with regard to simplicity of layout and speed of response time is very relevant. Complex websites are confusing to older users. Allowing adequate time for people to respond without being "timed out" is also important.

Q4. How can rail operators use social media to increase awareness of Assisted Travel?

By use of Twitter: Simply pin a tweet to their Twitter feed which says 'Did you know you are legally entitled to free assistance when travelling, at all times trains are running, including luggage assistance, including at unstaffed stations?' Social media is important, but should never be used as the sole means of communication. Many older people have neither the means nor the wish to use Twitter or other social media platforms. Nonetheless they are important tools if used in an easily understood way.

Q5. Are there any obstacles to providing Assisted Travel information no more than 'oneclick' from rail operators' website home pages?

Many people have not embraced IT sufficiently to make full use of this In any event train companies cannot deliver accessibility now with any degree of reliability

Q6. Should the ticket buying process be intrinsically linked to Assisted Travel booking? Are there any barriers to doing so?

There are many barriers through no fault of Train Operators but created as technology in various aspects proceeded at different speeds and without reference to each other. For example, people travelling in central London do not buy a ticket as they are using contactless payment - or a Freedom Pass. Basically without knowledge of technological changes proposed it appears there are many barriers.

Q7. How can rail operators' improve the availability and promotion of Assisted Travel information to third-party agencies?

Quite simply, by the printing of more leaflets, by sending more staff to events etc. As stated earlier by use of local radio and other outlets, free papers etc which are widely used by older people.

Q8. How can rail operators engage productively with third-party agencies? If there are particular obstacles to doing so, how can these be overcome?

Like many obstacles only adequate staffing will overcome problems Staff that is with time and knowledge to engage re accessibility issues. Some operators do, but many do not simply because there is no requirement in Franchise Agreement to demand the liaison.

Chapter two - User experience; improving the reliability of communications

Q9. How might the reliability of communications be improved?

For older people, communication through the presence of staff – at the station and on the train – is the best and most effective means – and the one most trusted by older travellers. Much research exists that proves older and disabled people value the presence of uniformed staff above all else. The industry has no difficulty at all in proving 100% reliable communications between locations and/or trains - it does so with signalling and train movement generally and is indeed one of the assumptions made in the prognosis that Guards are not needed to protect the Train itself when halted for whatever reason. Therefore, if that same fail-safe approach could be implemented re Assisted Travel extraordinary levels of reliability could be achieved

Q10. Would a cross-industry protocol overcome the difficulties experienced by Assisted Travel users? Can RDG play a leadership role in this area and deliver near-term improvement to the reliability of assistance provision?

It is certainly possible for RDG along with the RSSB to produce an industry wide protocol. Continuity and consistency across the TOCs is vital to the confidence of older and indeed vulnerable disabled people to travel. However, any such arrangement must be from the point of view it is good for the industry and not that this is the minimum requirement to discharge the obligations. There is the danger of what might be described as a lowest common denominator approach.

Q11. Would a commitment from rail operators to refund the cost of the journey if booked assistance was not provided as requested be of benefit to both operators in demonstrating their commitment to providing a reliable service and give passengers a form of remedy when failures occur?

Yes.

Q12. Are there any obstacles to individual rail operators introducing their own redress policy when the service for these passengers fails?

There are no legal obstacles; it is a matter of judgement as to whether different redress policies help when the emphasis in this exercise is about industry wide standards. Common and straightforward policies across TOCs are important to give older people the confidence to pursue redress where necessary.

Chapter three – Strengthening staff training

Q13. How can consistency in training for company staff across the industry on disabilities be achieved?

A common template or standard setting out the basic components of training is a key requirement. This must include awareness of issues affecting older people. Local older people's groups, forums and meetings could be asked to help with the training sessions.

Q14. How frequently should disabilities training take place and its content be refreshed?

On a regular basis, depending on the role of different staff groups, either annually or biennially would seem appropriate. For those in direct contact with disabled travellers, initial training must take place before they start work and be refreshed on an annual basis.

Q15. Should adherence to the DPTAC training framework become a mandatory element of the DPPP guidance?

Without knowing detail of DIPTAC standards it is not possible to give a detailed answer as noted above, a mandatory requirement for training which can be monitored and assessed is highly desirable.

Q16. Is there a role for annual independent verification of the quality of training? If so, who could do this; ORR/DPTAC/ANother? Could the results be used to rank performance to highlight good performers and require improvements of those who are struggling?

As noted above, consistency and continuity are particularly important to older travellers. Anything that promotes this is to be welcomed. Independent verification of the quality of training would be welcome – consistency across different operators is of paramount importance to disabled and older travellers.

Chapter four – Strengthening monitoring

Q17. We are particularly interested to hear about any pre-existing data collected within the rail industry, or beyond, which has the potential to be included in our monitoring to strengthen our oversight of licensees' activities on Assisted Travel. What further data is currently collected?

It is a regrettable fact that very little record is kept of Assisted Travel, be that journey successfully assisted or not. Improve the present arrangements so that people can come to rely upon their delivery.

Q18. Beyond our current or planned activities, are there any further suggestions as to how we might strengthen our monitoring of how well licensees are meeting their obligations in relation to Assisted Travel?

Frequent and consistent monitoring and enforcement will help to give older people the confidence to travel. In other responses to consultation NPC has pointed out that there is often a failure to regulate the performance of Train companies. The ORR should start taking action against operators who breach their DPPP -there are no examples available to indicate whether the ORR has taken any enforcement action against operators. Examples have been given of RIVAR Regulated trains running under Driver only operation calling at Unstaffed stations. If no action is taken it calls into question the need for monitoring? Special reports have been submitted based upon the experiences of three travellers. Copies can be provided of the report which highlights this point.

Q19. Are there any technological innovations, programmes or initiatives, beyond those described above, which could further bolster our Assisted Travel or DPPP compliance monitoring in the long-term? Chapter five – Reviewing DPPPs

As stated earlier, there should never be over reliance on technology as a substitute for human interaction. One approach that might succeed would be for the ORR to test proactively the robustness of an operator's DPPP, when anecdotal evidence or complaints are available that the operator is unable or unwilling to comply with regulatory or legal obligations.

Q20. Do you agree with our proposed approach to updating the guidance?

Please ensure that older people are an integral part of the process.

Q21. Do you agree with our proposed approach to reviewing DPPPs?

It is essential that the review process is not simply a tick box exercise and that it involves people with disabilities. DPTAC has a key role to play here and their involvement should carry weight with ORR. Please ensure that older people are an integral part of the process.

**P.G.Rayner FCILT FIRO Assoc IRSE MCIM
Vice President
National Pensioners Convention
Marchmont Community Centre
62 Marchmont Street
London
WC1N 1AB
January 2018**