

## ORR Accessible Travel Policy review form

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| <b>Stakeholder</b>       | DPTAC                |
| <b>Train Operator</b>    | Cross Country Trains |
| <b>Review start date</b> |                      |
| <b>Review end date</b>   |                      |

### ATP: Passenger Leaflet

| <b>Question</b>  | <b>Comments</b>   |
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| <b>Tone:</b> Does the leaflet have an appropriate tone? Is it friendly and welcoming in tone or is there too much reliance on legal or technical language and jargon?                      | DPTAC feels that the leaflet has an appropriate tone. It is relatively easy to read, and generally inspires confidence. We suggest that the layout of the leaflet is improved to make it more visually engaging.  |
| <b>Motivational impact:</b> Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?                                     | DPTAC feels that the leaflet will inspire confidence that a traveller's support and assistance needs will be met, but improvements could be made in terms of positively encouraging and motivating disabled people to travel.   |
| <b>Ease of use:</b> Does the content of the leaflet provide clarity both in terms of the language used and explanatory text? Does the leaflet have a logical and easy to follow structure? | DPTAC is happy with the logical flow of the leaflet and feels that it is easy to follow.<br><br>Some instances of language are fairly complex, and so DPTAC recommends reviewing the language for those with lower reading and comprehension abilities. Some sentences are very long. It may be useful to ask the Plain English Campaign to review the leaflet. |
| <b>Good practice:</b> Please highlight areas which are   | DPTAC is pleased to see that the following are mentioned: <ul style="list-style-type: none"> <li>• Trains stopping at unstaffed station</li> </ul>  |

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| <p>particularly strong and/or innovative.</p>  | <ul style="list-style-type: none"> <li>• The Arriva 'Helping Hand' priority seating card scheme</li> <li>• The Rail Ombudsman</li> </ul>   |
| <p><b>Other specific points:</b> Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.</p> | <ul style="list-style-type: none"> <li>• On page 4, in the section entitled 'Ticket Machines at stations', it would be helpful to explain why first class tickets cannot be used on Turbostar trains (i.e. because the two wheelchair spaces are in standard class).</li> <li>• Under Senior Railcard, it would be clearer if it said 'aged 60 or over' rather than 'over the age of 60'.</li> <li>• In the subsection on 'Mobility Scooters' on page 6-7, the paragraph starting 'Please seek the advice', should not have a full stop after the brackets.</li> <li>• On the first page it says, 'We appreciate that not all disabilities are visible so CrossCountry strives to provide rail services that are truly accessible to all.....'. DPTAC recommends the use of the term 'non-visible disabilities'. Both the leaflet and policy document feel weak in terms of acknowledging people with non-visible disabilities and stating how these people will be supported. Directly acknowledging the range of non-visible disabilities might give passengers increased confidence to travel. A list of possible examples would be useful, such as: <ul style="list-style-type: none"> <li>• mental health conditions, e.g. anxiety, depression, OCD, schizophrenia, personality disorders</li> <li>• Autism and Asperger Syndrome</li> <li>• sensory processing difficulties</li> <li>• cognitive impairment, e.g. dementia, traumatic brain injury, learning disabilities</li> <li>• 'non-visible' physical health conditions, e.g. chronic pain, respiratory and heart conditions, diabetes, cancer</li> <li>• hearing loss</li> <li>• low or restricted vision.</li> </ul> <p>There should be further information on how the travel needs of these people are addressed by CrossCountry. For example, someone with autism may feel reassured by knowing that CrossCountry directly recognise the needs of a person with Autism, and will have a better understanding as to how they may be helped in the various circumstances, e.g. assistance at times of disruption and understanding and appropriate communication from the train managers, etc.</p> </li> </ul> |

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|   | <ul style="list-style-type: none"> <li>• There is no mention as to whether these leaflets will be produced in different languages, and if so, how a different version could be obtained.</li> </ul>   |
| <b>Overall comments on the leaflet.</b> | Overall, this is an informative and reassuring leaflet, which would benefit from some amendments, and being made visually more appealing, encouraging and motivating. In particular, DPTAC suggest some thought is given to how the leaflet can be updated to read more inclusively for all disabilities, in particular non-visible disabilities. |

### ATP: Policy Document

| <b>Question</b>   | <b>Comments</b>   |
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| <p><b>Tone:</b> Does the policy document have an appropriate tone, bearing in mind that it is a more formal and comprehensive description of the train operator's policy with regards to accessibility.<br/>[NB. The document should still avoid excessive use of legal or technical language, and jargon.]</p> | The Policy document is well structured and generally does not use very much legal or technical jargon. It would be better to avoid use of the phrase 'modes of transport' and use something like 'methods of travel'. Overall, the tone is appropriate. |
| <p><b>Motivational impact:</b> Does the content of the policy document provide positive encouragement for disabled people to travel by rail?<br/>[NB. The policy document is inherently less focussed on</p>  | Whilst the document is generally reassuring to disabled passengers, it could do more to encourage and motivate passengers to travel, for example, by adding a motivating paragraph near the beginning.  |

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| <p>motivational content, but should nevertheless be written in a way that encourages of the train operator's services.]</p>   |   |
| <p><b>Ease of use:</b> Does the content provide clarity both in terms of language used and explanatory text? Does the document have a logical and easy to follow structure? Is the information provided sufficiently comprehensive and, where necessary, sufficiently detailed?</p> | <p>The document uses complex sentence structure in places. It needs reviewing for use of grammar, and to simplify and shorten some sentences to make it more accessible to people with a low reading or cognition skills. Alternatively, the Plain English Campaign could be asked to review the draft to ensure that it is accessible</p>  |
| <p><b>Good practice:</b> Please highlight areas which are particularly strong and/or innovative.</p>  | <p>DPTAC welcomes the mention of</p> <ul style="list-style-type: none"> <li>• Issues arising out of trains stopping at unstaffed stations</li> <li>• The Arriva Helping Hand scheme</li> </ul>  |
| <p><b>Other specific points:</b> Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions</p>   | <ul style="list-style-type: none"> <li>• The table mentioned near the bottom of page has not been included, but should have been.</li> <li>• On second page, in the paragraph starting 'Even if you have not booked....' it says '.... provide assistance that you request where reasonably practicable'. It should be explained what 'reasonably practicable' means.</li> <li>• On second page, in the paragraph starting 'To book assistance, please contact....', it says 'seven days a week when trains are running'. This may be misunderstood and so should be clarified.</li> <li>• At the end of the sub-section 'Changes and disruption to services' it says that assistance to reach the revised departure platform will be provided if is accessible to the passenger. It should explain what happens if the revised departure platform is not accessible to the passenger.</li> <li>• In the sub-section on 'Seats on trains and assistance on board' the paragraph starting 'we also participate' should be moved so that is precedes the paragraph starting 'Wheelchair spaces'.</li> </ul> |

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|   | <ul style="list-style-type: none"> <li>• In the sub-section ‘Our Accessible Travel Policy...’, it says that the documents are on the website in PDF format which is accessible using screen readers or other software with accessibility feature. Some screenreaders have difficulty with PDFs and but can read Word documents, so it would be useful to include Word versions of the documents on the website.</li> <li>• In the first paragraph of ‘Passenger journey information’ it says ‘... mental, intellectual or sensory considerations’. It would be better to say ‘... a mental, intellectual or sensory disability’.</li> <li>• In the first paragraph of ‘Passenger journey information’ it says it explains how information is conveyed, especially to people who have ‘mental, intellectual or sensory considerations’, but there is no mention in the text of how information is conveyed to such people.</li> <li>• Under ‘Senior Railcard’ it would be better to say ‘...anyone aged 60 years or over’ rather than ‘...over the age of 60’ which might be understood to mean aged 61 and over.</li> <li>• Under heading ‘Emergency procedures at stations’, second paragraph, it says ‘.... And includes the need to identify those who may need assistance ...’. It should be explained how this will be done for passengers with non-visible disabilities e.g. autism, mental health conditions, and medical conditions.</li> <li>• Under Staff Training on page 23, it would be good to have training about assisting people with non-visible disabilities mentioned more explicitly. It might be useful to consult with charities that cover the various non-visible disabilities.</li> </ul> |
| <p><b>Overall comments on the document.</b></p> | <p>DPTAC suggests some thought be given to ways that the policy document can be made to read more inclusively for all disabilities, in particular non-visible disabilities. In particular, it would be useful to consider how non-visible disabilities are described, and how people with non-visible disabilities can be identified and supported in their use of rail.</p>  |