ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	GWR Trains

ATP: Passenger Leaflet

Question	Comments
Tone: 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?	Overall DPTAC feels that the leaflet has an appropriate tone. It is welcoming and relatively easy to read. However, there are a few improvements we suggest. We trust that before printing the layout of the leaflet could be improved, making it more visually engaging. Perhaps including images. The text feels overly focussed on the needs to passengers with mobility impairments, particularly wheelchair users. While this is to some extent unavoidable because of their particular needs a few more examples of how assistance is provided to passengers with other impairments would help a wider range of disabled passengers identify how they can be assisted to use the railway network. On the first page, under 'Introduction', the second sentence makes reference to the main policy. This main policy is also mentioned towards the end of the leaflet. DPTAC suggest removing this sentence here and joining the first sentence to the second paragraph. This might provide a more welcoming introduction. There are some words such as the use of "impartial" under the Ticketing section which relate to the specific nature of the railway system and how it operates, but not everyone will understand. It would be better to simplify this and say something like, "We are committed to selling tickets at

	a fair price whether the ticket is for our rail network or not."
	Under <u>ticket machines</u>, it does not seem reasonable to expect the average passenger to know what is meant by this: *We've fitted automatic ticket machines at many of our stations over the last few years. All of them are in line with the DfT's 'Accessible train station design for disabled people: a code of practice' (Code of practice) when it comes to accessibility.* Instead the leaflet should say how usable the machines are for people who are blind/partially sighted/deaf/in a wheelchair/learning difficulties etc
	Some language is quite sales based such as "Our staff are trained to anticipate your needs" – what does this actually mean for a passenger?
	Some of the sections are very wordy, for example in <u>Supporting people with a disability in an evacuation</u> the first paragraph in this section seems to repeat information lower down and seems very corporate – does a passenger need to know about what information is in a corporate emergency plan? Surely they should just know what they need to do and what assistance they will be given?
Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	While overall DPTAC felt that the leaflet would be reassuring that a traveller's support and assistance needs would be met there were occasions where the caveats applied undermine the good intentions. We appreciate that there is a balance to be struck, particularly if passengers prefer to turn up and go rather than booking assistance in advance, but the following sections would benefit from some reconsideration.
	<u>Section on 'immediate action'</u> discourages passengers to travel in this way. It is not clear on what a lengthy wait might look like nor how a person knows if a station is staffed or not. There is no advice as to how long in advance of a train departure a person needs to arrive to ensure they will be able to access the service they wish. Also impossible for a disabled person to know if a station is "accessible to them" if they do not know if it is staffed or not. To improve this there needs to be greater clarification on the issues above and access to information on which

stations normally have staff and which do not.

A few pages down under At the station advice is then given about turning up for unbooked support that again makes it seem very hard to obtain this support and discourages passengers from expecting it.

Section on Assistance available needs additional text after the below the following line (italicised) to explain what happens if a station is unstaffed: *This includes help at staffed stations connecting between train services and from the platform to the station entrance.*

The section on mobility scooters is not clear and seems to contradict itself. It seems irrelevant if you have or haven't travelled with your scooter before as you need a permit regardless. The section should focus on how to get this permit, how long it lasts, how long it takes to arrive ahead of travel etc. There is no point confusing passengers further by adding scooter dimensions when a permit is needed anyway. We suggest this additional info is included on the permit site. It is also unclear who a user should let know if they need a wheelchair to get on the train, and at what point in the journey they should be requesting that assistance, e.g. at the station or in advance. It also sounds very discouraging to be asked to remove the luggage from the scooter before the train arrive as practically where will a lone traveller put it? It makes the use of a scooter sound very complicated and off putting.

It also gives no idea on where and how someone is meant to safely store their scooter as the leaflet suggests nor how one is expected to put their foldable scooter in the luggage rack – will they be relying on help from other passengers to do this? These issues again may put nervous travellers off using the train.

Under If things do not go as planned, it is unclear how a passenger can check for themselves if the train is running on time. I am not sure what value there is saying they send information to disability groups and local councils if there is no information on how this will benefit the passenger.

It is potential alarming to say that the operator "we will do everything we can to ensure that you are able to continue your journey and are not left stranded" – surely not being stranded should

	be a guarantee? Under If there is an emergency, it does not say how people who are visually impaired can access the evacuation guidelines that are displayed in the carriages
Ease of use: 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?	On the whole DPTAC were happy with the logical flow of the leaflet and felt it was easy to follow, both when reading in its entirety, and when 'dipping into' it. Some instances of language were fairly advanced, and so we would recommend reviewing language for those with lower reading and comprehension ability. Some sentences were very long. While it is not normally necessary to include page numbering in a leaflet the length of this document is such that it might be helpful. A text box or similar to separate the information about fare discounts might help to allow those who are concerned about practical help to skip this section if it is not relevant to them. Similarly consolidating contact information in a text box could reduce the frequency with which contact details are provided throughout the leaflet. As stated above, in the motivational impact section, it does not seem logical to discuss how to access a station without booked help early on the leaflet, and then describe how that works in practice a few pages later. At the bare minimum the first reference to booking assistance should tell the reader that more information on how this work when someone arrives at the station is provided later in the leaflet. Trains – aural and visual information section seems repetitive and unclear, asks people who cannot hear announcements to let a member of staff know and then later says there is visual information provided Under assistance dogs, what happens if the seat next to you is not reservable as suggested in the use of the text 'wherever possible'

Good practice: Please highlight areas which are particularly strong and/or innovative.	There is nothing which stands out. However this is to be expected from a franchise which has limited life remaining.
Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions.	There are just a few minor points not raised above: On the second page, under 'Assistance available', third bullet point, the description of the luggage you can take on board is different to the policy document but seems more reasonable. The two need to be the same though. At the moment it could be read that luggage needs to be at least 15kg and less than 23kg. Under 'Ticketing and fares', it might be helpful to tell passengers that they can pick tickets up bought through Passenger Assist , or online, at any station, rather than just the departure station.
Overall comments on the leaflet.	Overall an informative and fairly reassuring leaflet, which would benefit from some amendments, and being made visually more appealing. It could do with a clear edit that focuses on providing information that directly benefits a passenger. There are a number of occasions where the text seems to throw up as many questions as it answers, and some areas such as mobility scooters and unbooked travel that are potentially demotivating.

ATP: Policy Document

Question	Comments
Tone: 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. [NB. The document should still avoid excessive use of legal or technical language, and jargon.]	The Policy document is well structured and generally does not use legal or technical jargon. The tone is much clearer in the policy document than the leaflet, when it should be the other way around. The information here is much clearer on issues such as how to access ramps and the use of mobility scooters etc. Because of its length it would benefit from a contents section or other guide so that those who are consulting it seeking specific information can find it quickly rather than reading through all 25 pages. The policy document should be useful to rail staff and regulators as well as individual disabled passengers and as such could be written with rather more attention to these additional audiences.
Motivational impact: Does the content of the policy document provide positive encouragement for disabled people to travel by rail? [NB. The policy document is inherently less focussed on motivational content, but should nevertheless be written in a way that encourages of the train operator's services.]	The policy document is reasonably motivating. The additional detail gives those passengers who are looking for precise information about how their needs will be met greater assurance. However, the length of it obviously means that many passengers will not wish to read such a comprehensive document. For this reason it is important that the points of clarity about the leaflet raised above are addressed.

Ease of use: 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?	It is right that the policy is more comprehensive and inevitably included some more complex concepts. However, the document uses complex sentence structure in places, and some of these would benefit from restructuring.
Good practice: Please highlight areas which are particularly strong and/or innovative.	Mobile staff on the Thames Valley lines may address some of the concerns about staff availability on Driver Only Operated services. Obviously there will be trains on which staff are not available and disabled passengers may be forced to wait for a later train if they need assistance so this is far from an ideal solution.
Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions	The policy document, and as noted above the leaflet, are largely silent on non-visible disabilities. There should be more explicit mention of these disabilities. DPTAC's suggestion for the conditions that might be encompassed by 'non-visible disabilities' are: • mental health conditions, eg anxiety, depression, OCD, schizophrenia, personality disorders • Autism and Asperger Syndrome • sensory processing difficulties • cognitive impairment, eg dementia, traumatic brain injury, learning disabilities • 'non-visible' physical health conditions, eg chronic pain, respiratory and heart conditions, diabetes, cancer • hearing loss • low or restricted vision. On the first page, under 'Booking and providing assistance' second sentence, it says 'If you have a disability are elderly or have mobility difficulties,….' It isn't clear why 'mobility difficulties'

has been separated from 'disability'. Consider re-wording, and maybe including non-visible disabilities explicitly here.

On second page, paragraph starting 'If you can't give us 24 hours notice…', consider saying here that you can also just 'turn up and go'. There is a wide distinction between passengers who give 24 hours notice and those who seek to turn up and go. There will also be passengers who have booked assistance but have been delayed on their journey to the station and who need to take a later train. It would be helpful to acknowledge this.

On second page, under 'When you arrive at the station', consider re-phrasing sentence 'When a train arrives at a GWR terminating station, we aim to meet you within 5 minutes'. This won't make sense to everyone.

On page 3, under 'Assistance at part-staffed and unstaffed stations', it says 'GWR is introducing mobile staff on our driver only routes….'. Consider re-wording. This won't make sense to many people.

On page 4, last bullet point at the top, it says '……. and a reasonable number of drivers trained in disability awareness.;   This isn't very clear, and isn't very reassuring.

On page 5, under heading Assistance with luggage', it gives maximum sizes and weights for luggage. The large item is smaller than British Airways checked luggage. These sizes are not given in the leaflet, which manages this section much better. The policy and leaflet need to correspond.

On page 5, under heading 'Priority Seat Cards', if GWR are requesting medical information for a Priority Seat Card, then this should be mentioned here.

On page 8, under heading 'Passenger journey information (online at stations, on trains). There is a sentence that ends '…. Especially if you have mental, intellectual or sensory impairments.' Please consider re-wording. This sentence may offend some people. This also occurs on page 16, under heading 'Disruption', second paragraph.

	On page 19, under heading 'Replacement facilities', we suggest this paragraph is re-written as it is not clear what it is about. Perhaps provide some examples. On page 19, under 'Redress and compensation: Passenger Assist – what to do if our assistance fails', paragraph starting 'Our compensation schemes....', consider making it clear that you can't double claim compensation. On page 23, with regard to customer panels it would be helpful to give information about how passengers can find out about panel meetings so that they may attend if they wish.
Overall comments on the document.	This is a comprehensive document which, by giving more details about services, addresses some of the concerns raised about the leaflet where a shorter summary has sometimes raised questions and concerns. However it could be made easier to follow and should give more recognition to the needs of passengers with non-visible disabilities.