Jacqui Russell
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29 March 2022

Paul Hutchings
Managing Director
Arriva Rail London Ltd
By Email

Dear Paul,

Approval of Arriva Rail London Limited's Accessible Travel Policy (Condition 5 of the Station Licence and GB Statement of National Regulatory Conditions: Passenger)

Thank you for submitting Arriva Rail London's (ARL) Accessible Travel Policy (ATP) for approval.

We have reviewed the ATP against the September 2020 "Accessible Travel Policy Guidance for Train and Station Operators" (ATP Guidance). I can confirm ARL's ATP now meets the requirements of Condition 5 of its station and GB Statement of National Regulatory Conditions: Passenger (SNRP).

As part of this process, we discussed the provision of disability awareness / equality training to staff. We have been monitoring the progress of ARL's delivery of training to all its frontline staff and are pleased with the progress made.

We also discussed ARL's process for providing passenger assistance, which differs from the 'handover protocol' mandated in the ORR ATP Guidance. These discussions focused on the specific features of ARL services, and the alternative processes that ARL has implemented to ensure reliability. I have provided further detail on these areas below.

Passenger assistance

ORR requirements and approval process

Section A.1.2.e of the ATP Guidance specifies requirements for operators on the provision of assistance for passengers, stating that:

> "Where assistance is to be provided by station-based staff, in order that staff at the boarding station are able to ensure that the passenger will be met by a member of staff at the alighting station, operators must provide a dedicated

telephone number and a member of staff responsible for receiving calls from staff, for every station that the operator manages; assistance staff must also follow the handover protocol where it applies. In meeting these requirements all operators must follow the passenger assistance handover protocol technical guidance set out at Appendix C; this technical guidance does not apply where ORR has agreed an alternative process or technology, with equivalent functionality and effectiveness, may be used by the operator."

ORR's ATP Guidance document provides further detail about these requirements under Annex C: Passenger assistance handover protocol technical guidance.[1] These requirements are designed to improve clarity about responsibilities and consistency of process across the industry, and (in doing so) improve reliability. The three key elements are:

1) A dedicated assistance telephone number for each station.
2) A Responsible Person for assistance-related communications for every station.
3) A handover protocol for the communication of assistance information between stations.

I have provided a detailed breakdown of these requirements, and how ARL has either directly complied with them, or shown evidence of equivalent functionality and effectiveness, in an annex to this letter.

You made a request for ORR to consider and approve a different, ARL-specific operational model as an alternative process of equivalent functionality and effectiveness. We have discussed your proposals with you at length. On 21 April 2021 we met with you to discuss how assistance is communicated between origin and destination station. This initial meeting was followed by a subsequent meeting on 17 May 2021, when you gave a presentation of how the ARL process works in practice. We met again on 5 July 2021 to follow-up on some remaining questions, and to discuss usage data, which you provided. This engagement culminated in a site visit to the ARL control centre on 2 November 2021.

The ARL process

The current process used by ARL differs from the handover protocol technical guidance in several respects. Most importantly, rather than staff calling directly from origin to destination (or connection) stations, staff at the origin station call Passenger Assistance Control (PAC) team at Arriva Rail London control centre, which is then responsible for calling the destination station(s) to inform them of the journey and the assistance requirements. There are some distinctive features of the ARL passenger assistance model that, taken together and with consideration of the characteristics of ARL routes and services, mean that this is a proportionate and effective approach. I have listed these below.

- **Compared to other operators, ARL services operate at a high frequency, and passenger journeys are generally shorter in distance and duration.** This effectively reduces the significance for passengers of catching a specific timetabled service, and subsequently increases the importance of ARL providing assistance in

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[1] ORR ATP guidance: Accessible Travel Policy (orr.gov.uk), pages 50-52.

a flexible and agile manner that can adapt quickly to the circumstance and preference of passengers. There are certain circumstances, such as for short journeys, where this will also allow ARL to 'hold' a passenger at the origin station to allow the information to be communicated in sufficient time for assistance to be arranged at the destination station.

- **All stations that are managed or served by ARL are staffed from first-to-last train:** This ensures that there will always be somebody at the departure station (to receive the passenger, assist them onto the train, record relevant information and communicate it to the control centre). Similarly, there will always be somebody at the destination station (to receive the call from the PAC, assist the passenger off the train and, where necessary, onto a connecting service). All frontline station staff are trained in providing assistance, and it will typically be arranged by a member of staff at the entrance of the origin station. There is a dedicated responsible person, with primary responsibility for providing assistance. Each station has a single contact number, which will be routed automatically to relevant staff.

- **Assistance is provided on a 'Turn-Up-and-Go' basis, with no need to pre-book:** 95% of assistance is provided on an unbooked Turn-Up-and-Go basis. There are no seat reservations on ARL trains (although there are spaces throughout the train designed for passengers with accessibility needs). Where passengers do want to book in advance then this information will be held on the system in advance.

- **A dedicated Passenger Assist Control (PAC) team** that sits within the control centre to communicate assistance requirements, and to monitor all assistance across the ARL network, This team is trained in, and focused solely on, the provision of assistance. It has access to:
  - An accessibility database for all stations on the network[2].
  - Live information on any accessibility issues affecting the network[3].
  - A list of phone numbers for all stations, including back-up numbers in case they are unable to get through to the primary number for any reason
  - Train mapping systems to see the real-time location of trains, and a database of arrival and departure times.
  - A live spreadsheet to record all assisted journeys which is visible in real-time to all members of the PAC team.
  - Live CCTV footage for most stations, allowing the PAC team, where necessary, to observe passengers requiring assistance in real-time.

- **A consistent and well-understood standard-operating-procedure for communicating information.** The origin station will call the PAC, who will ensure that they have all relevant information including relevant details about any mobility or sensory impairments. Notes are made and readback is used to ensure understanding. Service information is provided, including departure time, train headcode and the passenger's position on the train. This information is entered into the system and relayed to the destination station, using a phone number that will automatically transfer to staff devices at the destination station. The information categories correspond to those required under the ORR ATP handover protocol guidance.

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[2] It contains detailed information on the accessibility characteristics and facilities at every station on the ARL network.
[3] For example, where a station lift may be temporarily out of use and thus render that station non-step free.

- **Connections on ARL services.** If the passenger is travelling on a connecting service, then the interchange station will be informed first, and future stations given advance warning. The staff at the interchange station will meet the customer as though they were the destination station and then phone PAC for the second leg of the journey, as a new origin station.
- **Connections with other operators.** PAC staff are familiar with the protocols for other interfacing train operators, and will communicate directly with relevant station staff for journeys where passengers will travel on other operators' trains, or to their stations. Similarly, other operators are familiar and satisfied with ARL's systems and processes, and will call PAC directly for any journeys to ARL's stations. This has been confirmed to ORR directly by all relevant operators who interface with ARL in the delivery of passenger assistance.

During our visit to the PAC control centre we probed the resilience of ARL's system, including live monitoring, risk-management and response. We noted how the use of databases (the Train Movement Information System and Darwin) helped to track assistance users in real-time between stations. This can help assuage passenger concerns about the lack of onboard staff on ARL services. PAC also has access to CCTV to track assistance for users boarding and alighting at all its managed stations.

We also noted how, if there were known issues (such as lift outages) at specific stations, then these were recorded and communicated. This ensured that all PAC staff were aware and able, if necessary, to re-route requests for assistance to ensure that passengers were informed and able to complete their journey without being stranded. We also noted the processes that were in place for managing incidents in real time where the passenger is already on the train, allowing staff to take quick and proportionate action where necessary to, for example, take the passenger to another station and book them a taxi for onward travel.

We also saw how the use of call-recording and central spreadsheets allowed the PAC to keep an accurate record of all assisted journeys. This information is aggregated and allows ARL to monitor its performance, and report accurate data to ORR. We were informed that, in the 4 months from 1 November 2019 – 29 February 2020, the PAC dealt with 8,383 passenger assistances.

Lastly, we sought feedback on the efficacy and reliability of ARL's call centre process from all other operators who either serve an ARL station station, or who manage a station where ARL services call at. None of them reported any systemic failings or concerns about ARL's arrangements.

Conclusion

In summary, ORR is satisfied that ARL's processes for assisted travel provide at least equivalent functionality and effectiveness to the handover protocol envisaged in the ATP Guidance, and we approve ARL's ATP on this basis.

Please provide a final proofed and branded version of all ATP documents by 26 April 2022. A copy of the approved ATP will then be published on our website along with a copy of this letter.

Yours sincerely,

Jacqui Russell

Jacqui Russell

ANNEX:

This table provides a detailed breakdown of the requirements in ORR's Passenger assistance handover protocol technical guidance [Annex C in the ATP Guidance].

Alongside in the table is shown how we consider that ARL has either complied directly with these requirements, or met the requirements via an alternative process with equivalent functionality and effectiveness

ATP Guidance requirements	ARL provision,
1) Dedicated assistance telephone number for each station:	
a) All stations must have a dedicated assistance number for receiving calls relating to assistance provision.	a) All ARL stations have a number for receiving assistance calls from PAC as a destination station. The PAC will be the point of contact for origin stations, and other operators.
b) The station's dedicated assistance telephone number may be made available to the public or can be for operational use only.	b) Direct compliance. For operational use only
c) The dedicated assistance telephone number for a station must be made widely available to any station or on-train staff who interact with the station for assistance purposes e.g. by ensuring the number is available and accurate in relevant industry systems	c) Direct compliance
d) The telephone line used for the dedicated assistance line must be capable of logging <u>when</u> calls are received to enable the Operator to audit communication as required e.g. can log when calls were received with precise times and dates.	d) PAC database and spreadsheet logs all calls, including times and dates.
e) By exception, in the event no one is available to answer calls made to the dedicated assistance telephone number, the assistance number must either be: (i) temporarily diverted elsewhere or; (ii) have a recorded message in place explaining the assistance arrangements for that station at that time.	e) Station numbers are routed automatically to front-line staff at the station. If all staff are busy, then a message will be left, and the call will be re-tried until confirmation is received.

2) Responsible Person for assistance-related communications for every station;	
a) An operator must ensure there is a rostered Responsible Person for each of its managed stations during hours when services are operating at the station	**a)** All stations staffed from first to last. Each station has a responsible person, and all frontline station staff are responsible and trained for dealing with assistance, including receiving calls.
b) During periods when stations are staffed the Responsible Person for the station must be on-site. During periods when the station is unstaffed the Responsible Person may be in a remote location	b) Direct compliance. All stations staffed first-to-last train.
c) The Responsible Person must have responsibility for ensuring calls to the dedicated assistance number are answered during times when trains are operating at that station. This means the Responsible Person may: answer calls to the dedicated assistance number themselves; delegate responsibility for this function to a colleague at that station; or by exception invoke the arrangements in 1e)	c) Member of station staff that first meets passenger at origin station will typically have responsibility for providing assistance and communicating to PAC. All frontline staff are trained to provide assistance, and are expected to answer call from PAC at destination station if available.There is a designated Responsible Person, accountable for ensuring that this happens.
d) The Responsible Person may or may not have direct responsibility for the <u>delivery</u> of assistance at the station.	d) All frontline ARL station staff are expected to provide assistance, as required.
3) Handover protocol for the communication of assistance information between stations	
a) The handover protocol applies where assistance is to be provided by station-based staff at the passenger's alighting station.	a) All information included within the specified ATP protocol is also used in the ARL / PAC process.
b) Where the handover protocol applies, it must be followed by station-based assistance staff at the passenger's boarding station, with the information pertinent to the passenger's assistance 'scenario' communicated to the passenger's alighting station.	b) ARL process differs. Rather than from station-station, communication is from origin station to PAC, then from PAC to destination station.
c) The handover protocol information must be communicated to the alighting station by calling its dedicated assistance telephone number.	c) Direct compliance