

# On Track for 2020? The Future of Accessible Rail Travel

## Final Report, May 2015

This Report was commissioned by the Association of Train Operating Companies (now the Rail Delivery Group) to consider how accessible Britain's railway network will be to older and disabled people by 1<sup>st</sup> January 2020 (the date by which all rolling stock must meet legal accessibility requirements).

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### **1 Context (Page 7)**

The Report looks at the physical accessibility of rolling stock and stations and also considers all the other facilities, services, policies and practices (actual and potential) that can affect the ability of older and disabled people to travel.

The Report also identifies current and future barriers to accessibility.

The Report has been written primarily for policy makers and practitioners concerned with the mobility of disabled and older people. It should also, of course, be highly relevant to those working in the rail industry.

### **2 Setting the Scene (Page 8)**

#### **2.1 Demographic Trends**

...There are now 11 million people in the UK aged 65 or over<sup>1</sup>.

By 2037 it is expected that the number of people aged over 65 will be around 1 in 4 of the total UK population<sup>2</sup>. There is also a significant increase predicted in the numbers of the oldest old...

...In addition, there are some 5.7 million disabled adults of working age, and 0.8 million children

Data on the prevalence of disability<sup>3</sup> indicates that, across the disability age spectrum, mobility impairments are the most common problem, affecting some 6.5 million people...

#### **2.2 Economic and social factors**

...It is also important to recognise the enormous contribution that older people make, directly and indirectly, to the economy. A 2011 report from the Royal Voluntary Service: "Gold Age Pensioners: Valuing the Socio-Economic Contribution of Older People in the UK"<sup>4</sup> noted:

*"Our research finds that older people made a positive net contribution of £40 billion to the UK economy in 2010. Furthermore, as the overall number of people over 65 increases and people remain healthier for longer, opportunities to make a positive contribution through work or volunteering will grow. As a result, by 2030, the positive net contribution of over 65s will rise to an estimated £77 billion."*

Much of the activity of older people which contributes to the economy is possible only because of their continued ability to travel, often by public transport...

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<sup>1</sup> ONS Mid-Year Population Estimates

<sup>2</sup> ONS UK Principal Population Projections 2012 variant

<sup>3</sup> Gov.UK Disability Facts and Figures, January 2014

<sup>4</sup> [http://www.royalvoluntaryservice.org.uk/Uploads/Documents/gold\\_age\\_report\\_2011.pdf](http://www.royalvoluntaryservice.org.uk/Uploads/Documents/gold_age_report_2011.pdf)

## 2.3 Current trends in rail travel (Page 13)

...A recently published report for the Office of Rail and Road “Disabled Travellers – Awareness of Rights”<sup>5</sup> indicates that a lack of confidence in service provision is the biggest single deterrent factor among the disabled and older people surveyed. Lack of access to stations and ticket prices were also quoted as reasons for not using public transport.

The research also indicated that, of the 350 disabled people surveyed, only 10% had seen, heard or read information from train operators about disabled passengers’ rights to assistance. 70% of respondents were unaware of any help available and only 9% had heard of the Passenger Assist service.

In contrast, however, we see that train journeys by Disabled Persons Railcard (DPRC) holders have more than doubled in the past 15 years...

...This suggests that for those who are aware of what is available – both in terms of reduced fares and assistance – train travel is attractive and of growing importance. However, for many older and disabled people there appears to be a major information and/or confidence gap preventing or deterring them from travelling.

## 6. Travelling with Confidence (Page 39)

### 6.1 Staffing

#### 6.1.1. Current situation

Outside the major conurbations, there is a universal trend to reduce the hours during which stations are staffed, including the availability of staffed ticket offices. Currently some 44% of all stations are completely unstaffed and a further 45% are unstaffed at some times of the day (staffing times vary widely). This means that 89% of stations will be without staff at some parts of the day even though trains are operating. It is also worth noting that at least one TOC states explicitly in its DPPP that ticket office staff are not able to provide assistance.

It is easy to understand the economic driving force behind these policies, but it is important to take a broader look at the impact that reduced staffing has on the numbers of people willing or able to travel to or from a given station.

Similarly if the trains themselves have no one to give assistance this acts as the other half of that equation and is important for similar reasons because, whether on station or train, there is clear evidence that older and/or disabled people value staff presence and face to face contact during their journey...

...There is however an indication that there will be an increase in initiatives to reduce staffing (Driver Only Operation (DOO)) which does have significant accessibility implications. The McNulty report in 2011: “Realising the potential of GB Rail”<sup>6</sup> states the case as follows:

*“The default position for all services on GB Rail network should be DOO with a second member of train crew only being provided when there is a commercial, technical or other imperative.”*

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<sup>5</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0010/11710/disabled-travellers-rights-awareness.pdf](http://orr.gov.uk/_data/assets/pdf_file/0010/11710/disabled-travellers-rights-awareness.pdf)

<sup>6</sup> <https://www.gov.uk/government/publications/realising-the-potential-of-gb-rail>

The bulk of services presently meeting the McNulty requirement are in areas where the stations are short distances apart, the services frequent and the stations staffed. The majority are in the London Suburban area.

### 6.1.2 The Challenges for 2020

On current trends, and given the clear steer in the McNulty report, it seems highly likely that by 2020 there will have been a significant increase in Driver Only Operation. If this is applied to services beyond the London commuter belt there will inevitably be considerable implications for the general confidence of older and disabled people to travel by train and for the provision of assisted travel.

There has been ample research evidence in the last decade that the presence of staff on stations is an important and much valued resource for passengers needing help to find information or buy tickets. It is also a major factor in making passengers feel safe<sup>7</sup>.

Transport Focus research in 2009<sup>8</sup> commented, for example;

*“All our research indicates passengers really like the reassurance only the presence of staff can bring. Taking staff away from stations would represent a very short-term, short-sighted saving.”*

While these concerns are voiced by passengers across the age spectrum, they are particularly strongly felt by older people who are least likely to be able to cope comfortably with ticket machines and other automated systems and who are often most in need of the reassurance that uniformed staff presence can bring.

Disabled people are also significantly affected. The Department for Transport’s accessibility strategy “Railways for All”<sup>9</sup> notes that:

*“Staff are seen by many passengers, and by disabled passengers in particular, as important at times of disruption, especially unplanned engineering works or delayed trains and in improving personal security, all of which increase confidence to travel by rail.”*

They also note that:

*“Staff play a key role in providing assistance particularly on the station concourse and platforms.”*

The ‘other imperatives’ referred to in the McNulty report include the ability of older and disabled people “to contribute to and participate in society and the economy”. Given the growing number of older passengers and the clear evidence of their need for the presence of staff both for reassurance and for assistance, it is hard to see how these further economies meet this imperative.

It is difficult too, in legal terms, to see how trains with no staff to provide assistance running through unstaffed stations cannot come under the heading of a “provision, criterion or practice” that discriminates. (Section 20 of the Equality Act 2010<sup>10</sup>).

It is clearly not possible to obtain unbooked assisted travel to or from an unstaffed station unless there is some member of staff there to assist with the boarding or alighting.

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<sup>7</sup> Passenger Perceptions of Personal Security on Public Transport, Independent Social Research 2009

<sup>8</sup> Passenger perceptions of personal security on the railways, Passenger Focus 2009

<sup>9</sup> Railways for All: The Accessibility Strategy for Great Britain’s Railways, 2006

<sup>10</sup> [http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga\\_20100015\\_en.pdf](http://www.legislation.gov.uk/ukpga/2010/15/pdfs/ukpga_20100015_en.pdf)

Critically, it is Conductors who are in the front line in providing assisted boarding and alighting, including platform-train ramps where appropriate, at the majority of platforms which are not staffed. It is Conductors who are best placed to ensure that assistance is delivered effectively and in accordance with the law. A key risk area is availability of help in getting off the train.

During disruption and in the event of an emergency, Conductors can also deliver the railway's duty of care to assisted passengers and other older and disabled people. This is further developed in Chapter 6.8.

### **6.1.3 The challenges that remain**

Services operating without staff to assist running through unstaffed stations will clearly be unable to provide the assistance that many older and disabled people need. This, in turn, will undermine the excellent reputation that many TOCs and Network Rail have built up in this area.

Staff visibility on the platform and the ability of on-train staff to hold departure at unstaffed stations to enable a disabled passenger to board or alight are vital for both access and safety reasons.

Before decisions are taken about routes and services on which further economies of staffing are envisaged, a full assessment of the likely impact on disabled and older travellers needs to be undertaken together with consideration of how legal and contractual obligations to provide assistance can continue to be met.

### **6.3 Passenger Assistance**

...ATOC figures indicate that around 1 million booked "assists" are delivered each year, and this is rising by about 5% a year.

However, a majority of "assisted" passengers do not book. Data is not kept systematically, but anecdotal evidence from Network Rail suggests that the split between booked and unbooked assistance at major stations is about 50/50. Anecdotal evidence suggests that at most other stations around 75% of assistance is unbooked. This percentage varies according to journey type, TOC policy and station size.

The most common types of assistance delivered are: provision of platform-train ramps; other boarding/alighting assistance; assistance with luggage; navigation assistance around stations; and provision of a replacement accessible taxi, either due to station accessibility barriers, or during engineering works.

There is a variation in the level of service promised by different train and station operators in their DPPP, for example, whether assistance can be booked at unstaffed stations, or whether mobility scooters can be taken on trains. In some cases wording is ambiguous, e.g. whether 'assistance' actually means that a member of staff will attend, or an accessible taxi will be provided instead.

Research by Transport Focus has highlighted the inconsistency of Assisted Travel delivery<sup>11</sup>. For example, only 79% of surveyed passengers who had booked assistance received help alighting from their train. 75% of passengers were satisfied with the assistance provided overall...

...There is a significant variation in levels of train and station staffing across the network, which affects the ability of operators to respond to short notice changes to assistance requirements, or to unbooked assistance. The company ethos of TOCs and attitudes of their workforce (including the

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<sup>11</sup> Passenger Assist, Passenger Focus, March 2014

scope and depth of training) may also have an impact on the ability of passengers to get unbooked assistance.

As noted earlier, where there are no staff to assist on trains calling at unstaffed stations, it is not possible to provide unbooked boarding and alighting assistance.

According to a recent ORR survey<sup>12</sup>, only 9% of a sample of disabled people, and those assisting them, had heard of the Passenger Assist system. The huge majority of disabled rail travellers, and non-rail travellers, do not know that they can get assistance free of charge. It would seem likely that this suppresses demand to a significant degree.

## **6.6 Station Design**

...Good design standards and regular monitoring of all access features is vital. It is essential for disabled and older people to be confident that the toilets will be working and that the lift will not be out of service or unavailable. They cannot afford to take a chance.

Vulnerability and a fear for one's own safety increases with age and loss of agility. This means that older people are often put off by things that would not concern others such as poor lighting, no obvious security, an absence of staff. Closed Circuit Television (CCTV), while it is useful, does not always give older people the assurance it may give younger travellers, perhaps as older people will often have less trust in technology. So real or imagined safety in a public place is important. See also 6.7 below...

...It should be recognised that many Station Facility Owners are, in fact, tenants, not owners. This means that they have few incentives to improve station conditions, although many small scale improvements will be mandated by the Franchise Agreement, as will co-operation with third party improvements from, for example, Network Rail.

It is essential that the ORR is adequately resourced to audit and enforce existing standards.

A further question to consider is how the Department for Transport, through the franchising process can incentivise long term capital investment focussed on system wide and external benefits.

## **6.7 Personal Security**

While stations and trains are generally safe environments, for many older and disabled people, a perception of risk for their personal security is a very real deterrent factor. Poor lighting, presence of undergrowth or other potential hiding places alongside platforms, the area around the station car park or bus stop area all affect the confidence people feel in travelling.

Automatic recordings or disembodied voices do not in any way provide the reassurance required by older people. Uniformed staff presence, backed by good lighting and CCTV and clear signage especially at interchange points are basic essentials along with audible and visual information.

The Transport Focus Report "The Experiences of Disabled Rail Travellers – National Rail Passenger Survey 2013"<sup>13</sup> asked respondents if they had cause to worry about personal security when travelling by train in the last 6 months.

18% of disabled passengers expressed concern for their personal security compared with 11% of non-disabled passengers. Lack of staff and anti-social behaviour by other passengers were rated as

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<sup>12</sup> Disabled Passengers Awareness of Assistance from Train Operators, ORR, March 2014

<sup>13</sup> <http://www.passengerfocus.org.uk/research/publications/nrps-and-bps-accessibility-analysis-2013>

the areas of greatest concern both at the station and on the train. There are also growing numbers of reports of hate crime against disabled people which is adding to many people's concern for their personal safety.

## **6.8 Delays, disruptions and emergencies**

It is very important that all plans and policies for dealing with emergency situations, including evacuation of stations or trains, deal specifically with how to communicate with and assist appropriately those passengers who cannot see, cannot hear, cannot understand what is happening or cannot move independently. This needs to be incorporated both in procedures and in training.

It is also important, in times of delay and in the event of an incident, to have plans in place for back up staff – those not directly involved in dealing with the incident – to be deployed to assist directly with the travelling public and for them to be equipped to deal sensitively with the most vulnerable passengers...

...In circumstances such as these there needs to be a robust system in place to:

- Inform people who need to know what the access implications of any rerouting or disruption are;
- Ensure that the Journey Planner can cope with step free journey enquiries during disruption;
- Put accessibility high on the criteria to be considered where alternative routes for diverted trains are planned. At holiday periods in particular, the planned use of a non-step-free station as an alternative to a major station is unacceptable;
- Base negotiations between TOCs on ticket acceptance together with the need to maintain an accessible railway.

## **7. Getting Smart (Page 55)**

This Chapter looks at the information currently provided by the rail industry to passengers and at its ease of use and accessibility to older and disabled passengers.

Trying to decipher timetables can be a major source of stress and anxiety for many disabled and older people. The simpler the train frequencies and service patterns, the less need for complex timetabling and the easier it becomes.

However, even where timetabling is straightforward, the complexity of the fare structure, which penalises those who don't book in advance, often means that use of the internet becomes almost compulsory.

### **7.1 Pre-journey information and planning**

Across all transport modes, use of the internet is now the predominant source of information and guidance on planning and booking a journey. Increasingly operators are cutting back on paper based information and expecting travellers to do the necessary research and booking on-line.

...data produced in 2013 by the Office for National Statistics<sup>14</sup>, indicates the significant drop in internet availability and usage by those aged over 65 – and even among those aged 45 to 64 only just over half use the internet for travel bookings..

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<sup>14</sup> Internet Access: Households and Individual, ONS 2013

...While the usage of the internet by older people will undoubtedly rise in the coming years, it is a mistake to believe that there is no longer a need for more conventional forms of information and communication to meet the needs of the large and growing population of older people, many of whom have both the time and the income to travel.

## **8. External Factors (Page 62)**

### **8.1 Franchise Policy**

#### **8.1.3 An “outcome” based approach**

DfT take the view that operators are clear on their legal obligations under the Equality Act 2010 and the PRM TSI. They feel that the Government should move away from a compliance based approach and focus instead on outcomes. They do recognise, however, that contracts must include a range of specific and measurable outputs as well as broader outcomes.

As part of this new focus, there is a new franchise requirement for TOCs to produce a customer strategy and an annual report on customer feedback which must be published. The hope is that this will promote a greater sense of ownership among passengers and a recognition that they are valued. It would clearly be helpful if these reports could also be extended to those who are not using trains because they have lost confidence or do not feel their needs are being met. This wider community outreach could highlight some of the key concerns that disabled and older people feel.

#### **8.1.4 Investment**

A key objective for the franchise process is to even out investment across the franchise period and to break the perverse investment incentives that currently distort the pattern of improvements and upgrades during the 7 year cycle. In future investment plans which have a payback outside the franchise period will be scored in the bidding process.

For stations, a new requirement will be to provide a 40 year asset management plan which will be independently audited and updated on a rolling basis.

## **8.4 Government policy changes**

The potential for a change in the political complexion of Government will always cause uncertainties for an industry with as high a public profile as rail. Investment and other priorities can change significantly.

While it is highly unlikely that any political party would explicitly decide to scrap or delay accessibility, it is always possible that some of the planned investments on accessibility could become casualties of a broader Government cost cutting strategy.

## **8.5 Public Opinion Changes**

While strong public feelings about major new rail infrastructure investment will continue to be felt, it is, again, unlikely that accessibility would be targeted directly in any negative way.

However, where hard pressed commuters perceive that seats are lost or new rolling stock is delayed in the name of accessibility, there is always the possibility of a backlash in public opinion. All manner of excuses can be used not to improve accessibility!

## **8.6 Legal Precedent**

There have been very few relevant cases brought against the rail industry (as a service provider) under the Equality Act 2010, or its predecessor the Disability Discrimination Act 1995. This means that there is very little case law, which could help the industry understand what is likely to be a 'reasonable adjustment' to prevent discrimination against disabled people. However, it is highly likely that at some point relevant case law will be made.

It is impossible to predict the effect of future legal decisions. However, it is likely that case law will in future have an impact on accessibility. The current legal challenge over the priority for wheelchair users to occupy the designated space on buses is a case in point.

## **9. Summary of recommendations (Page 70)**

It is clear from the evidence presented in this Report that there has been very significant progress in recent years in improving access to Britain's railways for older and disabled people and for many others whose mobility is reduced when travelling (such as parents with prams and buggies). In many cases this goes beyond simply meeting legal requirements and demonstrates innovation and best practice.

Credit for these improvements should be taken by large numbers of organisations and individuals working in the industry, including the Department for Transport, Network Rail, the ORR, the ROSCOs, the TOCs, TfL and, of course ATOC.

However, although the main building blocks for delivering further improvements are in place, there is a risk that other economic and operational driving forces may reduce the benefit that, for example more accessible rolling stock and stations can bring.

This Chapter sets out some key recommendations across a range of policy areas that could help to ensure that the spirit as well as the letter of the law is delivered. It is not an exhaustive list and it is hoped that the Report will provoke discussion across the industry and generate further ideas for change.

The Rail Delivery Group (RDG) will be responsible for taking forward many of the issues that this report and its recommendations deal with. The recommendations set out below have therefore been grouped according to the relevant areas set out in the RDG's current work programme.

### **Communications**

#### **1. Proactive leadership on accessibility**

ATOC is already active in providing a forum for industry discussion and initiatives in the field of accessibility. However, given the wide variation between TOCs in standards and approaches, there is scope for RDG to take a more proactive stance in working with all the TOCs both to raise standards and improve consistency in policies and practices.

#### **2. Turn up and Go**

Continue to promote "Turn up and Go" assistance which is clearly what many disabled and older people would like to see to enable them to travel with greater flexibility and spontaneity.

## **Franchising**

### **3. Incentivising long-term capital investment**

It is clear that the deadline of 1<sup>st</sup> January 2020 for full rolling stock accessibility compliance will not be met unless urgent steps are taken to tackle the in-built disincentive for TOCs to invest beyond the duration of their franchise.

DfT should consider urgently how to use the franchise process to incentivise long term capital investment focussed on system wide and external benefits.

## **Health & Safety**

### **4. Contingency Planning**

Ensure that all plans and policies for dealing with emergency situations, including evacuation of stations or trains, deal specifically with how to communicate with and assist appropriately those passengers who cannot see, cannot hear or cannot follow standard evacuation advice.

Ensure that, where services are diverted because of disruption, step free access at alternative stations, accessible transfers between the two and comprehensive information is available to all passengers including those without access to the internet or social media or unable to follow written or oral station announcements without assistance.

Base negotiations between TOCs on ticket acceptance during planned engineering works on the need to maintain an accessible railway.

### **6. Identifying “compatible” mobility scooters**

Currently different TOCs set different standards and limitations for the scooters they will accept on board. This is confusing and unhelpful to disabled people. There needs to be clear consistent standards and guidance applicable across the network and presented in a consistent format.

## **People**

### **11. Staffing**

There should always be on-board staff available to assist passengers at unstaffed stations. These staff should have appropriate training in Rules and professional competence in this area.

Urgent consideration should be given to how current policies on staffing levels can be modified to ensure that greater progress towards accessibility is maintained.

### **12. Passenger Assist**

A reliable system is needed to enable passengers to call for help if assistance (particularly with getting off a train) does not arrive. For those without access to Social Media in particular a phone number (staffed at all times) should be made available and made known as a point of contact.

### **13. Assisted Journeys**

Re-examine station staffing policies to ensure that there is an acceptable means of delivering assistance to those who need it in accordance with legal and best practice requirements.

Consider the implications for disabled and older passengers of promoting the availability of the Passenger Assist scheme compared with the reality of being able to deliver an effective service to passengers who need assistance.

#### **14. Training**

Train all staff and customer-facing contractors and refresh training every two years in accessibility in Disability Awareness/Equality and, where relevant, in delivery of assistance.

Work to develop a common and consistent approach to training comprising both initial and refresher modules based on a common core curriculum which all TOCs should follow.

Ensure that training also extends to managers and engineers (as required by PRM-TSI).

#### **Performance**

##### **15. Monitoring and enforcement of DPPP**

ORR is responsible for approving and monitoring implementation of DPPPs produced by the TOCs. This is welcome but there remain a number of DPPPs which do not meet the current guidance.

ORR should continue to take a proactive role in ensuring the DPPP is of real value to disabled and older passengers. The ORR open letter to TOCs dated 18<sup>th</sup> December 2014<sup>15</sup> is a welcome step in this direction.

ORR needs to be adequately resourced to discharge this responsibility.

##### **16. Consistency in delivery of policies**

There is currently a lack of consistency between and within TOCs on the extent to which legal and best practice requirements are implemented and delivered. One example is on-board Passenger Information Systems. There is a clear legal requirement for real time audio and visual information to be available to passengers before departure and throughout the journey.

However, it does not take many journeys across the network to find examples of the system being switched off, overridden by staff, or simply giving incorrect information. Part of the solution is clearly more rigorous training of staff responsible for setting the equipment. There is also an issue of technical incompatibility between PIS systems which means that where different stock is linked, the systems may be incapable of linking.

It is important that ORR monitors and enforces the requirement. Without accurate and consistent information across all TOCs, many passengers will simply lose the confidence to travel.

There are many other operational areas in which auditing by ORR could help to raise standards and to keep them consistently higher.

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<sup>15</sup> [http://orr.gov.uk/\\_\\_data/assets/pdf\\_file/0006/16377/dppp-compliance-and-approval-process.pdf](http://orr.gov.uk/__data/assets/pdf_file/0006/16377/dppp-compliance-and-approval-process.pdf)

## **Stations**

### **21. Passenger Information on train location**

Many platforms are served by trains of varying type and/or length. However, there is no standard method of informing passengers which part of the platform the train will stop at, or where to wait to board a particular part of the train. In many cases, no information at all is provided. This can cause difficulties for passengers who may have to move a considerable distance along the platform at short notice.

Consider ways of informing passengers more effectively and consistently of position of different train formations, similar to the “Wagenstandanzeiger” arrangements on the DB in Germany.

This document was posted on [abcommuters.wordpress.com](http://abcommuters.wordpress.com) on 26.06.17. along with jpeg files of the

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Note from the editor: ABC was sent the full paper copy of this report and we have endeavoured to reproduce as much as possible here – with a focus on those areas that are particularly relevant to the failures of access experienced by our disabled members. We will produce a full digital version as soon as our limited resources allow. In the meantime, the entire report has been photocopied and sent on to relevant disability rights campaigns.