ORR Accessible Travel Policy review form

Stakeholder	Disabled Persons Transport Advisory Committee
Train Operator	East Midlands Railway
Review start date	21st June 2019
Review end date	19th July 2019

ATP: Passenger Leaflet

Question	Comments
Tone: Does the document carry an appropriate tone?	The passenger leaflet was reviewed by five members of DPTAC, and the majority view was that the tone of the leaflet was appropriate.
Motivational content: Does the content provide positive encouragement to disabled people to make journeys on the operator's service?	The majority view was that the leaflet did provide positive encouragement to disabled people to use EMR services. In this context the inclusion of the Text Relay number and the support available for journey planning were thought to be particularly helpful. It was also felt that the leaflet conveyed a sense of fairly comprehensive arrangements for disabled passengers being in place, including back-up arrangements for dealing with those occasions when things went wrong or stations/trains becoming inaccessible. However, there was some concern around the extent to which the leaflet adequately explained or encouraged 'turn up and go travel'. It was also suggested that inclusion of a section on 'Travel Training' would help provide positive encouragement to travel.

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? .	In general the language used in the leaflet was thought to be clear and accessible. Three reviewers felt the leaflet to be user friendly. However, there were fairly strong concerns from two reviewers about the length of the leaflet, which, for various reasons, it was felt could act as a deterrent to some potential users. Although it was acknowledged that the length of the leaflet was partly the result of ORR-mandated text and content, both reviewers felt that the leaflet would benefit from being shorter if this could be achieved without loss of meaning. One reviewer had very strong concerns about the structure of the leaflet, which seemed to stem from a lack of clarity about its purpose; in particular the extent to which the leaflet aimed to provide a general guide to the use of EMR services by disabled people (irrespective of whether they needed assistance or not) or whether it was focussed on just those disabled people that needed assistance. For instance section A1 'making rail travel accessible for all' seem to largely focus just on assisted travel, whereas later parts of the leaflet provided more general information on non-assistance related features designed to facilitate travel by disabled people. Even in terms of assistance there seemed to be a degree of confusion between Passenger Assist and the more general assistance available to disabled passengers. This confusion was exacerbated by the fact that Passenger Assist was not mentioned at all in section on A2, which specifically dealt with assistance, but was then introduced much later in the leaflet, but only in the context of the Passenger Assist app. Overall, for this reviewer the leaflet did not follow a logical structure, was muddled and confusing in terms of content, and lacked clarity in terms of what it was trying to communicate.
Good practice: Please highlight areas which are	The sections on 'where to get more information and how to get in touch' and on Railcard discounts were thought to be particularly helpful. The user-friendliness of the leaflet, and that it

particularly strong and/or innovative	was written in clear, plain English were also highlighted.
Recommendations or other specific points: Please specify any areas which may be inaccurate or require further consideration.	A number of specific points/suggestions were made: • The wheelchair size specified as acceptable by EMR is 700mm x 1000mm, which does not conform to the reference size dimensions for wheelchairs. Can EMR confirm that by 1/1/20 all their trains will be able to accept reference size wheelchairs? • The only services where it is currently possible to book a wheelchair space are those serving Skegness. Is it planned to extend the ability to reserve a wheelchair space to other services? • An attractive and clear layout of the leaflet will be important for those disabled passengers with dyslexia or neuro-diverse impairments. • Reference is made to 'St Dunstans', which changed its name some months ago and is now called 'Blind Veterans UK'. • Reference to the 'Blue Badge' scheme should be included in the section on disabled parking. • It would be useful for EMR to consider creating a BSL film clip to enable BSL users to better understand what is available. • it would be useful to include a section on onwards travel in terms of what EMR can offer in terms of supporting disabled passengers to reach destination from station. • References to 'hidden disabilities' should be replaced by references to 'non-visible disabilities'. • Some additional, specific comments have been shown as 'marked-up' text in a copy of the passenger leaflet document sent with this review form.
Overall comments	Whilst overall it was felt that the tone and clarity of the leaflet were good, and that it was user-friendly and provided positive encouragement to disabled passengers, there were concerns around the length of the leaflet, and stronger concerns around its structure and some of its content, in particular the extent to which it was focussed on assisted travel or intended to provide a more general guide to disabled passengers.

ATP: Policy Document

Question	Comments
Tone: Does the document carry an appropriate tone?	The majority view of the five DPTAC reviewers was that the policy document felt more like a legal compliance document than an informational or motivational document, but confusingly the style of the text fell somewhere between the two. It begged questions about what the purpose of this document was, and which audience it was aimed at. The document again seemed to be unclear about whether it was about assisted travel or a more general statement of the operator's policy around accessibility. As one of our reviewers highlighted '…right at the beginning it states '*this document sets out our policies and approach towards providing assistance for customers with restricted mobility and requiring assistance*', which can be read as if it is only relevant to assisted passengers, followed thereafter by over 2 pages which are indeed only relevant to assisted passengers. If this document is to have a wider appeal, it should make clear early on its relevance to all older and disabled passengers.'
Motivational content: Does the content provide positive encouragement to disabled people to make journeys on the operator's service?	Views were mixed on this. A couple of reviewers felt that it was motivational, particularly in terms of its thorough and comprehensive approach. However, three reviewers felt that the length of the document was an issue, although it was acknowledged that this stemmed partly from the structure and content mandated by the ORR. One reviewer felt strongly that the combination of the documents length, the density of the text, its somewhat ambiguous style, and the lack of clarity around its purpose undermined its use as a motivational document. This again begged questions around its purpose: informational/motivational document or statement of operator policy?
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? .	Views were again very mixed on this. Whilst two reviewers felt that the document was easy to use, with clear and accessible language, two other reviewers were more critical. The length of the document was, in particular, an area of concern. As one reviewer highlighted 'The document has 11,752 words, spread across 24 pages of A4 – or if put into 14 point large-print, 34 pages! If this is aimed at older and disabled passengers then it would benefit from slimming down considerably, where feasible and consistent with ORR's requirements. There doesn't seem to be any evidence that the operator has attempted to minimise the document length/ clarity etc.' Another reviewer felt that the somewhat wordy style and lack of clarity around its purpose of the document made it difficult to use. They also felt that the ambiguity around whether the document was about assisted travel or the accessibility of the operator's services more generally compromised the structure and flow of the document.
Good practice: Please highlight areas which are particularly strong and/or innovative	Comments have been summarised below: • 'I like the section which talks about the commitment to accessibility through the entire company's management structure and the bit about working with local communities and disabled groups'. • The information about discount cards is extremely comprehensive and useful. • 'I very strongly liked the impressive list of planned improvements at EMT inc establishing an Inclusivity Forum, adoption of Blue Assist and additional Passenger Assist survey.' • Staff training looks really good but one question would relate to have / were disabled people involved in the design of the training? • The 'Inclusivity Forum' looks to be a good development (but another reviewer was concerned that the wide-ranging nature of this forum would mean that it would lack the focus on disability issues required to drive improvements to accessibility, particularly given the range of impairments that need to be represented on the forum).
Recommendations or other	• There seemed to be little or any reference to 'turn up and go'?

| **specific points**: Please specify any areas which may be inaccurate or require further consideration.

. | • References to 'Passenger Assis't were patchy and inconsistent.
• It would be useful to ascertain whether EMR recognise Therapy Dogs as a form of assistance dog. NB: This would be of particular relevance to passengers with MH related conditions.
• It would be useful to include a 'Plain English' statement on what PRM-TSI means.
• On p20 there is reference to a 'Fully Accessible' train fleet. This needs to be reworded as there is no such thing as 'fully accessible' (plus EMR cite some of their rolling stock as being non PRM-TSI compliant).
• Do EMR have a mystery shopping approach to check services are working as they should to help mitigate complaint levels?
• A large number of EMR stations are unstaffed or part-staffed. The document states *'When booking your assistance, if your journey is to or from a station which does not have staff there all the time or has no staff we will do our best to ensure you have the help and assistance you need.'* This doesn't seem to provide adequate reassurance that assistance will be provided – even when booked.
• Under 'Assistance with luggage' it states: '*we do not employ staff specifically to carry customers' luggage*'. As luggage assistance is a licence obligation, surely staff duties must specifically include this duty?
• The wheelchair size specified as acceptable by EMR is 700mm x 1000mm, which does not conform to the reference size dimensions for wheelchairs. Can EMR confirm that by 1/1/20 all their trains will be able to accept reference size wheelchairs?
• B1/ B4 – there is no mention of the operator's plans to improve step-free access to station platforms. This is a major issue across this franchise.
• References to the Disability Discrimination Act (B6 for instance) should be removed/amended.
• References to 'hidden disabilities' should be replaced by references to 'non-visible disabilities'
• Some additional, specific comments have been shown as 'marked-up' text in a copy of the policy document sent with this review form. |
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| Overall comments | Views were very mixed on this document. Whilst two reviewers noted that the document was comprehensive and clear with a range of positive features/innovations, two other reviewers were considerably more critical feeling that the document was overly long, too wordy, and ambiguous in purpose. This latter point was shared more widely with a majority view that the document read more like a compliance statement than an informational/motivational text.

In general, we believe that it would make sense to be clearer about what the purpose of the policy document is and the audience at which it's aimed. A key issue within this is the extent to which it is focused on assistance or on accessibility more generally.

It is perhaps finally worth observing that despite its length it doesn't provide a comprehensive list of EMR stations and a description of their accessibility by type of impairment, and that it underplays the extent to which the EMR fleet will be non-Tsi compliant after the expiry of the end-2019 compliance deadline. |
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