ORR Accessible Travel Policy review form

Stakeholder	DPTAC
Train Operator	South Western Railway
Review end date	4/3/2020

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?	The tone was generally appropriate, but, in general, the leaflet would benefit from a thorough edit to make it more succinct. Consider putting the second paragraph, starting 'It is important…' as the first paragraph to make a more welcoming feel to the leaflet. Consider other ways to make the leaflet feel more welcoming and friendly. The introductory section needs to make clear that as well as providing information on assistance, the leaflet also provides more general information on the accessibility of SWR's stations and services. The leaflet would benefit from being made more visually engaging by the use of photographs and other graphics.
Motivational impact: Does the leaflet provide positive encouragement for disabled people to travel by train as a result of reading the leaflet?	The leaflet was reasonably motivational. The motivational content could be improved by placing greater emphasis on the fact that the leaflet provided information to people with any kind of disability whether visible or non-visible. In this context it would be helpful to include some examples in the leaflet of how the SWR network had been made accessible for people with non-visible disabilities,
Ease of use: Does the content of the leaflet provide clarity both in terms of the language used and	The language of this leaflet was much too difficult in places. Some instances of language were fairly advanced, and so we would recommend reviewing language for those with lower reading and comprehension abilities.

explanatory text? Does the leaflet have a logical and easy to follow structure?	The use of overly-complex language was, in places, exacerbated by poor and convoluted English.

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.

Consider putting the section 'When travel is being arranged in advance' before the section 'For immediate travel'.

It wasn't clear why the section on wheelchairs and mobility scooters was in the section on 'Before you travel', when logically it fitted better with 'Help on the train'? |
| **Good practice:** Please highlight areas which are particularly strong and/or innovative. | - The ability to request immediate assistance via the SWR App;
- Video vending machines, with staff support via video at unmanned stations;
- Travel Assistance Card scheme. |
| **Other specific points**: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions. | Slightly odd wording in the third paragraph of the introduction beginning 'If you do not travel by train very often…'. The leaflet will be of interest to all disabled travellers irrespective of the frequency of their travel

Under Introduction, fifth paragraph, give examples of formats leaflet and policy are available in.

Under 'For immediate travel', first paragraph, how are passengers supposed to find the guard to ask for assistance?

Under 'The levels of assistance we are able to provide', second paragraph, replace 'hidden disabilities' with non-visible disabilities. Provide some examples of non-visible disabilities (see comments on policy document).

In the 'buying your ticket' sections the information on video ticket vending machines is unnecessarily repeated. Passengers can also purchase tickets through the stations/websites of other train companies and from 'third party' retailers such as the Trainline.

Under the section 'Discounts and railcards some of the information is incorrect or misleading: the visually impaired and wheelchair discounts are available to those disabled people that meet the required criteria |

irrespective of whether they have a Railcard; and the discounts also apply to a companion travelling with the disabled person (the language describing the latter is particularly poor…'the same discount will apply if you have one companion (?)'.

The title 'Loading your railcard onto your Oyster card'. We don't think it will be obvious to everyone what 'loading' in this context means. Maybe 'linking your railcard to your Oyster card'? Same comment in the paragraph below title. Also, the leaflet should explain what a 'Freedom Pass' is, and the fact that it is available to people under 60-65 with a disability and who meet the relevant qualifying criteria.

Under heading 'Wheelchairs and mobility scooters', fourth paragraph, why can't SWR take larger scooter weights on trains other than the Island Line? It seems completely illogical to base the maximum weight for scooters across the whole SWR network on the limitations applying to rolling stock on just one, very small element of it. Some of the information in this section is repeated such as the need to have scooter permit.

Under heading 'Wheelchairs and mobility scooters', why are there different sizes for 3 wheeled scooters and 4 wheeled scooters? Maybe explain this?

Under heading 'At a staffed station', fourth paragraph, why is there a reference to 'free of charge'? Surely there is no charge for any luggage provided that it does not exceed the maxima set out in the National Rail Conditions of Carriage?

Under heading 'seat reservations', third paragraph, what if a wheelchair user wanted to travel first class?

Under heading 'Audio and visual information', second paragraph, how do passengers find a member of the on board crew in order to seek clarification?

Under 'Assistance on arrival' it is saying that when you get to your destination (which may not be the train's final destination) you may have to wait five minutes before you get helped off. Won't the train have left by then?

Under 'Delays and disruptions', first paragraph, consider putting some examples about how a journey may be disrupted.

Under heading 'Redress and compensation', first paragraph, rephrase final sentence.

Overall comments on the leaflet.	Overall the leaflet would benefit from a thorough edit to simply the language used, improve the quality and clarity of the English, and avoid unnecessary repetition. It would also benefit from the use of imagery to make it more visually engaging. The motivational content of the leaflet could also be increased/improved. Greater reference to non-visible disabilities would also improve the leaflet.

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 tone was generally appropriate but the language used is generally overly-wordy and complex. This together with poor English and repetition contributes to the excessive length of the Document. There were a number of examples of jargon – 'handover protocol', 'ORR', 'DfT', 'step-free access category', 'drill holes', 'step-plates', and so on
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 Document is reasonably motivational in terms of the language used but its sheer length and complexity undermine this, and render it significantly less motivational than it might be.

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?	The sheer length of the Document (23 pages) makes it very difficult to use, and it would benefit from a thorough edit to reduce its length, but also to employ a more succinct approach with less use of complex language and simpler sentence structures, Given its length the document needs to begin with a 'contents' section.
Good practice: Please highlight areas which are particularly strong and/or innovative.	The seat warning card for Assistance dogs Customers being able to request assistance via app (although it is not easy to find in the app) Plus the examples given above in the feedback on the Passenger Leaflet.
Other specific points: Please raise any other points that you think are relevant including any areas of inaccuracy and/or omissions	Under 'Commitments to providing assistance' 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 - dementia - 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. In general the list of passengers who might qualify for assistance needs to be re-drafted – for instance arthritis is only one of many conditions that can lead to mobility impairments. There are inconsistencies in terminology between leaflet and policy. Sometimes there is mention of non-

visible disabilities, and sometimes mention of hidden disabilities. DPTAC favours 'non-visible disabilities'.

Under heading 'A1.1 Passenger Assist System', it talks about being able to book assistance on the SWR app. We found it difficult to find this on the app.

Under heading 'A1.1 Passenger Assist System' it talks about being helped off the train within five minutes of the train's arrival time, and this not only being at the final destination station. Surely at stations before the final destination the train is likely to have left within the five minutes?

Under heading 'Assistance without having pre-booked', first paragraph, it talks about 'security checks'. We don't think passengers will know what this is about. Needs further explanation or a different example?

Under heading 'Assistance with luggage', second paragraph, it says 'one small item free of charge', which seems to imply you may get charged for help with other luggage? Presumably 'free of charge' should be deleted?

Under heading 'Assistance with luggage' there is a list of maximum sizes of luggage. These are not in the leaflet, so not all passengers will be aware of these. Are these sizes important? If so they should be in leaflet as well. Would it not be better to just put a maximum weight? (In both leaflet and policy) Is there a maximum weight?

Under heading 'Seats on trains', first paragraph, it says 'and better facilities in order to help get in and out of them'. What are these better facilities?

Under heading 'Seats on trains', second paragraph, it talks about the Transport for London scheme. Maybe mention could also be made of the Sunflower Lanyard scheme which is becoming more widespread. Perhaps mention of both these schemes could go in the leaflet?

Under heading 'A2.4 Information points, help points and contact centres', first paragraph, it talks about 'these information posters' as though they have been mentioned beforehand, but we don't think they have.

Under heading 'A2.4 Information points, help points and contact centres', second paragraph, it talks

about 'Assisted Boarding points', but doesn't say how to find them/recognise them, or what they are.

Under heading 'A2.4 Information points, help points and contact centres', third paragraph, it talks about 'a dedicated meeting point for booked assistance'. Is this the same as the 'Assisted Boarding Point'? Needs better explanation.

Under heading 'A2.5 Websites' it talks about 'WCAG standards' with no explanation of what this means. Perhaps put 'Web Content Accessibility Standards'.

Under heading 'A3 Ticketing', third paragraph, last sentence, should it be '….use your Disabled Persons Railcard and receive the relevant discounts' (and rather than or)?

Under heading 'Disabled Persons Railcard', first paragraph, We believe it should be 'You are entitled to a discount of a third on most rail tickets'? (not 'up to'). This may need checking.

Under heading 'Freedom Pass', first sentence, rather than saying the pass could be available to others under 65 who meet certain qualifying criteria, should this reference being available to disabled people who meet their criteria? It should also be noted that the qualifying age for Freedom Passes is 60, but is progressively being increased to 65 to bring it into line with the new qualifying ages for state pensions.

Under heading 'A4 Alternative accessible transport', first sentence, it should read '…there are some that may be..'

Under heading 'A4 Alternative accessible transport', second and third bullet point. We weren't sure what these had to do with station accessibility. Do they? If they do maybe provide examples to clarify.

Under heading 'A5 Wheelchairs, mobility scooters and mobility aids' there is a table of train types. Not sure how customers know what type each train is?

Under heading 'A5 Wheelchairs, mobility scooters and mobility aids' there are different measurements given for 3 wheeled scooters and 4 wheeled scooters. Why is there a difference? May need explaining.

Under heading 'A5 Wheelchairs, mobility scooters and mobility aids', penultimate paragraph, the first sentence doesn't make sense. A policy can't have been created by rigorous testing.

	Under heading 'A6 Delays, disruption to services, and emergencies', third paragraph, there is mention of 'customer'. Should this be 'passenger'? Check for consistency in policy and leaflet.
	Under heading 'A6 Delays, disruption to services, and emergencies' third paragraph, '… or could not understand….' sounds a little offensive… maybe change to '… or need further help understanding the information…' or something a bit kinder…
	Under heading 'A6 Delays, disruption to services, and emergencies', fifth paragraph, there has been a section inserted starting 'Many bus and coach companies….'. The contents of this section were completely inappropriate in a Document of this kind and should be removed.
	Under heading 'A7.2 Blue Badge Parking Spaces', third paragraph, it talks about the 'International Symbol for Access'. This is terminology that many people won't understand. Maybe just refer to 'these spaces are marked as disabled', or consider talking about the wheelchair symbol.
	Under heading 'A7.4 Replacement facilities', We found this paragraph difficult to understand. We think it needs re-writing. At the end it says '…for example', but no example is given.
	Under heading 'A8 Redress', last paragraph, it talks about an example of a plane ticket, which we found rather odd, consider giving an example to do with rail. Is SWR accepting responsibility for consequential liabilities?
	Under heading 'B1 Strategy', second paragraph, it talks about 'customer pain points'. What are these?
	Under heading 'B2 Management arrangements' We felt there was a lot of detail that wasn't really necessary in this Policy Document.
	Under 'B3 Monitoring and Evaluation', there are references to 'A&I'. Although we appreciate this has been explained in B2, we don't think using initials is helpful, and it would be better to put the full title. People may not have read B2.
	Throughout the policy it would be helpful to put in more references to 'non-visible disabilities' and how passengers with them could be helped in practice. It might help people with disabilities to be able to recognise themselves in the document, and have an idea what help might be available to them at various points. For example, what help might be available for someone with autism? Even just

	mentioning autism might help some people feel more confident that the train companies have an understanding of their difficulties, which will help some. Knowing if you have autism that when there is disruption / platform changes that someone is there to help them, can be reassuring. There was a lack of information in the Document of how to complain, relevant customer contact points for complaints, the Rail Ombudsman and so on. The Document would benefit from a clear statement that expressed the commitment of the Managing-Director of SWR and their leadership team to operating an inclusive and accessible railway.
Overall comments on the document.	The Document is too long and employs language which is overly complex. It would benefit from a thorough edit to reduce its length through the use of clearer, more succinct language, better English, and the avoidance of repetition. Please note that many of the specific comments made with reference to the Passenger Leaflet also apply to the Policy Document.