

**Annette Egginton**

Head of Competition and Consumer Policy  
Directorate of Railway Markets & Economics

Email: [annette.egginton@orr.gsi.gov.uk](mailto:annette.egginton@orr.gsi.gov.uk)

25 July 2016

Karl Watts  
Managing Director  
Rail Operations Group

Dear Karl,

**Approval of Rail Operations Group Disabled People's Protection Policy (Condition 5 of the GB Passenger Statement of National Regulatory Conditions)**

Thank you for submitting your draft Disabled People's Protection Policy (DPPP) for approval. A copy of your approved DPPP is attached to this letter, and will be published on our website along with a copy of this letter.

We note that, as a charter operator, Rail Operations Group (ROG) differs from a franchised operator in the following areas:

- ROG will not be selling tickets or advertising tours directly, this will be done via a booking agent, who will be the main passenger interface for both the booking of tours and booking any required assistance;
- The passenger facing website will be that of the booking agent and not ROG's own website;
- ROG do not participate in Passenger Assist as they will be running only pre-booked charter services and will instead deal with station operators directly in order to request the required assistance;
- ROG do not accept railcards;
- The rolling stock used by ROG will vary from tour to tour.

I confirm that we have reviewed your DPPP against the key areas of the 2009 Guidance "How to write your Disabled People's Protection Policy: A guide for Train and Station Operators" (the guidance), which we identified as being relevant to ROG's operations given the differences above, and can confirm that your DPPP meets the requirements of Condition 5 of your GB Passenger Statement of National Regulatory Conditions (SNRP). We also sought views on your draft DPPP from Transport Focus, London TravelWatch and the Disabled Persons Transport Advisory Committee (DPTAC).

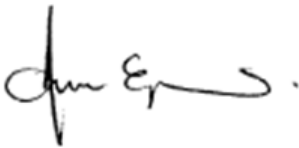
We particularly welcome your decision to review performance against the commitments of your DPPP after the completion of each charter operation, with a view to identifying and making relevant improvements in the service you provide to disabled passengers.



You have confirmed that the website of your booking agent, Vintage Trains, will be amended to ensure that information on your DPPP is clear for passengers. Please could you update us when this work has been completed, and in any case no later than 1 month from the date of this letter.

As you are aware, ORR intends to undertake a wider review of policy with regard to charter and heritage operators and following this review there may be a need to revisit your policy. We will be in touch with more detail later this year. Please note this review may result in a requirement for some changes to your DPPP.

Yours sincerely,



**Annette Egginton**



## **Rail Operations Group Disabled Peoples Protection Policy**

### ***Policy Statement***

Rail Operations Group (ROG) acknowledges that it has both a statutory and a moral duty to seek to improve services for people with disabilities on its Charter Train Operations.

ROG is committed to maintaining and where practicable, improving the accessibility for people with disabilities on any Charter Services we operate.

The company will actively liaise with Charter Tour Operators, Station Operators, other mainline Train Operating Companies, Network Rail and Ticket retailers/Booking Agents to ensure that the needs of passengers with disabilities are met and that appropriate access can be gained to our train services. We will actively support this with appropriately trained personnel and equipment such as wheelchair ramps.

When sourcing rolling stock for use in our charter services, wherever possible, we will use Rolling stock that is compliant with Disabled Persons needs and are committed to meeting full accessibility on all our services by 2020.

Where fully compliant stock is not available, we will source the most accessible vehicles available and we will ensure that information is clearly available at the point of ticket sales explaining clearly what the accessibility restrictions are and why we are unable to meet all needs.

Karl Watts

Managing Director

Rail Operations Group

***May 2016***

## **1. Management of Charter Services**

### **1.1 Background to Operations**

Rail Operations Group (ROG) is applying for [*has been granted*] a license by the Office of Rail & Road (ORR) for the operation of Passenger Charter Services over Network Rail controlled infrastructure. The majority of Passenger Charters we operate will be [*are*] non-stopping day-trips from point A to Point B and return, with no interim calling points, organised and arranged 'in-house' with Vintage Trains acting as booking agents and main point of contact for passengers.

We will also offer existing Charter Tour Operators the service of providing locomotive traction in a 'Hook and Haul' arrangement, where the Charter Tour Operator may specify or supply rolling stock and will undertake the passenger facing and booking arrangements.

All Charter Services generally allocate specific seating to passengers. More accessible seats close to toilet facilities will be 'held back' for mobility impaired passengers until the train is filling up

ROG do not plan to undertake any 'heritage' steam operations.

### **1.2 How we plan a Passenger Charter Tour**

All ROG services are planned using our Traffic Acceptance Process (TAP). This process is designed to ensure that our train planners have considered all aspects of operating the train service and includes:

- Locomotive and Rolling Stock requirements (including accessibility considerations)
- Route of Tour
- Station Access (Including accessibility considerations)
- Staffing level requirements

The plan is then reviewed by high-level Managers and undergoes a review, risk assessment and approvals process to ensure that due consideration has been given to all aspects of operating that particular service.

## **1.3 Stations**

ROG does not own or operate any stations themselves. Station access for our Charter train services are arranged with the appropriate Station operator or Network Rail during the planning stages of organising each charter tour through our Traffic Acceptance Process.

This planning process prompts the Managers planning the Tour to have specific consideration of the needs of disabled passengers when determining origin and destination stations or interim calling points, particularly Station access facilities and assistance available at all calling points.

## **1.4 Rolling Stock**

Many carriages available to the Charter Train market were built in the 1950s and 1960s and were not designed with the needs of disabled passengers in mind, however ROG are committed to sourcing Rolling Stock that is suitable for the needs of people with disabilities where possible, including more modern stock when available and specially modified vehicles (where possible or practicable).

We will also seek to influence any third party Charter Tour Operators of the need to consider accessibility, where they are contracting us to haul their own Rolling Stock on their behalf, of the need to be working towards full compliance by 2020.

Where there are limitations in terms of access for disabled passengers, we will ensure that information is clearly available to passengers on any promotional material or websites for the tour, whether provided by our Booking Agents or Charter Tour Operator. (See next section)

Carriages used in the Charter Train Market rarely have passenger information screens fitted, however they will all have on-board PA systems and announcements will be made to provide customers with any information required as to the running of the train and approximate times of arrival. Charter Tours are generally operated from Point A to Point B and return, and therefore there are rarely requirements for passengers to be made aware of intermediate station stops. On-board staff will be advised if any passengers may need assistance in receiving this type of information and will ensure that those passengers are kept similarly informed.

## 1.5 Passenger Information prior to booking

The management of promoting tours and facilitating ticket sales or taking bookings will be undertaken either by Vintage Trains (acting as our booking agent) or by the Charter Tour Operator and therefore these organisations will have prime responsibility for communication with Passengers and providing appropriate information.

ROG will ensure during Charter Tour planning stages, that all involved organisations are fully aware of their obligations under the requirements of this policy and under the Equality Act 2010, through our contractual arrangements and service level agreements.

Whilst we cannot fully dictate or control third party Charter Tour Operators procedures for communicating with Passengers, we will actively seek to influence them in taking the needs of disabled passengers into account when designing their promotional and booking materials for their tour at contract negotiation stage and will provide copies of ROG **Guidance for Disabled Passengers** (See Page 8) for inclusion on websites/booking materials.

Most ROG operated charters however will be promoted by Vintage Trains, our booking agents, and will be available to book through their office or website. Promotional material for each Tour will provide clear details about the Tour, the origin and destination stations, the rolling stock, contact details and also sources of advice for disabled passengers such as the **Guidance for Disabled Passengers** which details what type of assistance is usually available. Clear information about any restrictions there might be and why, in terms of accessibility or assistance at stations or on-board trains, will also be provided in relation to each Tour.

This guidance will also be available on the ROG Website on a link from the Contact Us Page.

## 1.6 Passenger Information during booking

When our booking agents receive a booking for any ROG operated services a copy of our General Guidance for Disabled Passengers will be included with tickets and forwarded to the passenger prior to their journey. If there are any specific restrictions on that particular Charter due to the type of rolling stock available, this will also be included.

Where booking and promotional arrangements are provided by another chartering or Tour Operating company, ROG will use its influence to ensure that similar information for disabled passengers is made easily available at the time of booking. Service Level Agreements will detail specific arrangements in line with this Policy and the Guidance for Disabled Passengers (Appendix A) will be adjusted to reflect appropriate Booking Agents contact details.

The General Guidance for Disabled Passengers advises passengers to contact our Booking Agent to discuss accessibility/assistance requirements at least 48 hours prior to the tour. This is due to the nature of Charter Operations which, unlike timetabled services, have Tour-specific multiple interfaces with other organisations, many of whom require 24hour notice to book assistance. Bookings for all passengers on our Charters will normally close 7 days prior to the tour taking place. This enables a robust planning process for each tour and ample time to make any arrangements for Disabled Passenger assistance with station operators and on-board staff. In the unlikely event that this cut-off date is not imposed, this will be clearly indicated on promotional material and we will arrange with our booking agents to man/monitor their booking facilities over the weekend prior to the tour in order to promptly communicate any additional requirements to us.

## **1.7 Finalising DPPP arrangements prior to Charter Tour Operation**

Whenever our booking agents or Charter Tour Operators are made aware of any assistance requirements for a Disabled Passenger, they will immediately advise ROG by email/phone and ROG will take each individual passengers needs into account when finalising Charter Arrangements, such as:

- liaison with Station Operators to arrange specific assistance requirements within the station or in making connections with other mainline operators
- Arranging additional On-Board Staff if necessary
- Briefing on-board staff in regard to specific assistance arrangements, such as help with Boarding and alighting, seating arrangements, additional assistance in terms of accessing any on-board catering (whether that be providing a 'fetch and carry' service, or assistance to access the catering vehicle)
- Specific arrangements and briefing of staff in relation to caring for any vulnerable passengers in an emergency etc.
- Understanding possible alternative transport requirements in the event of train failure

24 hours prior to the operation of any ROG Charter Tour, ROG Control will contact start and destination stations to establish if there are any issues which may impact accessibility for passengers. If problems such as lift breakdown are reported, ROG Control and station operators will establish whether alternative arrangements are available and advise any affected passengers of agreed arrangements or, if necessary the need to cancel their booking with appropriate compensation, via the booking agents.

## **1.8 Staff Training**

ROG will ensure that all staff involved in or on ROG operated Charter Trains have received suitable formal training on disability awareness. For ROG Employees and On-board or booking staff provided by Vintage Trains, this training shall be provided by a leading disability charity. Refresher briefings will be provided to ROG staff every two years, as part of our RMS002: Management of Information, and Vintage Trains will be required to provide similar ongoing training via a contractual obligation.

For Third Party Charterer Tour Operators, evidence of similar suitable training of their employees acting as booking or on-board staff, will be required at Contract and Traffic Acceptance stages.

Specific training for individual roles will also be provided to ROG employees, or required as part of Contract Acceptance with Vintage Trains or Charter Tour Operators, such as:

- Management and Planning Staff – Disability and equality awareness training to ensure they are made aware of their responsibilities to disabled passengers.
- Booking /Customer facing staff - how to communicate clearly with disabled people (including those with speech impairment or learning difficulties)
- On-Board staff - the operation and use of Wheelchair Ramps (this activity will be limited to ROG employees only.)

In addition, On-board staff will receive a pre-job briefing prior to the commencement of each Charter which will include details of any Disabled Passengers requiring assistance, allocating responsibilities and additional guidance if required.

## **1.9 Service Disruption or Emergencies**

In the event of an emergency or the failure of any of our services, on-board staff will take into particular account the requirements of any disabled passengers on board the train, having been fully briefed on these arrangements prior to the charter. Depending on the nature of the event, if necessary they will discretely discuss with the person whether they have any additional needs, for example in the event of an emergency evacuation.

ROG on-board staff will make contact with ROG Control who will ensure:

- suitably accessible onwards transport will be available if required
- Any booked assistance for connecting services/at stations is advised and kept informed of any changes to plans.
- That any emergency response teams attending are aware of potentially vulnerable passengers with disabilities on our service.

Should passengers have any concerns they are encouraged to discuss these with the on-board staff who will be able to offer guidance and assistance.



## **1.10 Monitoring and Review**

On the completion of each charter, senior management will review the operation with the charterer as part of the Contract Review process. Performance against this DPPP and the ROG Complaints Handling Policy will form part of this review and any lessons learned will be incorporated into future planning processes. This will be undertaken around 10-20 days following the charter, to allow time for customer feedback to be received and reviewed.

Pre-planned Service Level Agreement Review Meetings will take place at 8-weekly intervals with Booking Agents and any complaints from charter customers – whether disabled or not – will be reviewed as a regular Agenda Item, along with any associated investigations and responses.

Performance of the ROG DPPP and any issues arising from either of these review meetings will be reported to the ROG Safety & Performance Review Group, chaired by the Operations & Compliance Director, who has overall responsibility for the ROG DPPP.

## ***Making Rail Accessible***

### ***Guidance for Passengers Requiring Assistance on ROG Operated Charter Trains***

This Guidance forms part of the Rail Operations Group 'Disabled Persons Protection Policy'.

We will always do our best to help disabled passengers that need assistance, but if you think you may need help when travelling on any of our Charters it is best to book assistance in advance so that we can ensure that any help you need is provided.

You can do this by contacting our Booking Agents and we recommend that you do this at least 48 hours prior to the Charter Journey. This is because each Charter is a 'one-off' so we may need to make arrangements with a number of other organisations to make sure that any help you need is provided and your journey is as comfortable and enjoyable as possible.

This can be done via our Booking Agent – Vintage Trains in the following ways:

General telephone booking/ help-line, available 0930-1630 on weekdays, with answerphone available outside these hours.	<b>0121-708-4960</b>
Email:	<b><a href="mailto:office@vintagetrains.co.uk">office@vintagetrains.co.uk</a></b>
Website 'Contact Us' page	<b><a href="http://www.vintagetrains.co.uk/contact/">http://www.vintagetrains.co.uk/contact/</a></b>
Write to:	<b>Vintage Trains, 670 Warwick Road, Tyseley, Birmingham. B11 2HL</b>

Sometimes we may not be able to offer a fully accessible experience if your Charter Tour is using older-style carriages. Where this is the case we will fully explain any potential restrictions on the Tour details. If you are concerned that you may encounter problems, we recommend you call our Booking Agents to discuss your concerns and they will be happy to advise you further.

Assistance Dogs are welcome on all our services.

## *What Kind Of Assistance Is Available?*

### **Passengers with impaired Hearing**

We can arrange for on-board staff to provide some additional assistance to you if you can't hear announcements through our on-board PA's.

### **Passengers with impaired mobility or vision**

We can arrange the following additional assistance if you have impaired mobility or vision:

- Arrange assistance at start and destination stations with getting on and off our trains.
- Make arrangements with Station Operators to provide assistance for you to get around start or destination stations and make any connections with other train services before or after your tour with us.
- Allocate appropriate seats to you, such as seats that have a bit more room to maneuver or that are close to exit doors or toilet facilities. We reserve our most accessible seats for people requiring additional assistance, but these are limited in number but will be allocated on a first-come, first-served basis so we advise you to let us know as soon as possible if you have difficulty with certain types of seats and we will do our best to accommodate your requirements.
- Arrange to convey collapsible/foldable wheelchairs in another part of the train and return them to your carriage door at each end of the journey.
- Arrange for a wheelchair ramp to be available, if required (we carry ramps in all our brake vans) The safe working load of our ramps is 300kg..
- Our staff are not qualified to provide assistance with physical lifting of people, but will help you to get to your seats in any other way that they can.

## **Non-folding Wheelchairs and mobility scooters**

Many carriages used in the Charter Train market were mostly built in the 1950s and 1960s before disabled access legislation was introduced. This means that access to seating areas and toilets can be very restrictive. ROG are very sorry to advise that it will therefore be unlikely that we will be able to take a non-folding wheelchair or motorised mobility scooter into the main seating areas or vestibules unless the specific charter is using more modern/compliant rolling stock.

Our ability to accommodate these types of wheelchairs or scooters will be clearly advised in promotional material or on the booking agents website for each individual tour so we would advise you to check carefully before booking.

Other important things to check with our booking agents before booking are:

- Depending on the Rolling Stock that has been arranged for the Tour, we may be able to accommodate a limited number of passengers who need this sort of wheelchair or scooter in the brake/guard's van on the train. This cannot be guaranteed, and will be on a first-come first-served basis. Where this is available, we will ensure that the guards van is clean, lit and heated if necessary, and provide you with assistance in getting on and off the train. There will also be a member of staff available to provide you with any other assistance you require during your journey.
- Our wheelchair ramps are designed to accommodate weights up to 300Kg, so you need to ensure that the combined weight of both chair and occupant does not exceed this limit.
- There may also be size restrictions, particularly in width, depending on the type of Rolling Stock used. Please have the dimensions of your chair/scooter available when you talk to our booking agent.
- Any accompanying passengers may be required to travel in the main body of the train for their comfort and safety if there is no additional seating available in the brake/guards van. Our booking agents will be able to advise if this is the case.

## ***Station Facilities and Access***

ROG are not directly responsible for the operation of any passenger stations, which are operated by a variety of Train Operating companies or Network Rail.

ROG will liaise with station operators at the early stages of planning a Charter Tour, to determine the level of facilities available for people with disabilities, for example, step free access to platforms, assistance with getting around the station or connecting to other rail services and the availability of wheelchair ramps and accessible toilets.

We will ensure this accessibility information is made clear in all promotional material for each individual tour.

## **Communication of this DPPP**

A copy of this Policy is [will be] available on the Rail Operations Group website – [www.railopsgroup.co.uk](http://www.railopsgroup.co.uk)

Copies can also be requested by:

Mail to:

General Manager  
Rail Operations Group  
Wyvern House  
Railway Terrace  
Derby  
DE1 2RU

Email: [info@railopsgroup.co.uk](mailto:info@railopsgroup.co.uk)

A Large Print version (.16 Arial) is available on request