

## Consultation response

### **1. What are your views on replacing ‘Disabled People’s Protection Policy’ with ‘Inclusive Travel Policy’ or ‘Accessible Travel Policy’?**

We agree that current terminology is outdated and needs to be replaced. In this respect, we would deem ‘Inclusive Travel Policy’ to be a much more appropriate term and one that is more in keeping with current trends. We would add that ‘Accessible Travel Policy’ is perhaps more suggestive of *physical* accessibility alone, whereas ‘inclusive’ is a broader term that encapsulates a much wider set of accessibility issues.

### **2. What are your views on our proposal to replace the current passenger-facing document ‘Making Rail Accessible: helping older and disabled people’ with a more concise, passenger-friendly document as set out in the draft revised guidance?**

We agree that the existing passenger-facing document is too long and should be consolidated in order to make it more accessible and user-friendly.

### **3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?**

We have no specific views on this, but given the detail in some existing rolling stock accessibility information it seems sensible that this form part of the policy document.

### **4. What are your views on the proposed changes to the approval and review process? Do you have any additional suggestions for improvement?**

We are strongly in favour of co-production as a model of policy design, and support proposals for operators to involve local disability and user groups in the development of a DPPP, and to incorporate their feedback subsequently. Local Disabled cyclists and inclusive cycling hubs/groups should also be involved in this process to ensure a plurality of views.

### **5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?**

We welcome proposals for more detailed step-free access classifications at train stations, which will have the benefit of allowing Disabled passengers to make clearer distinctions as to the extent to which a station is truly ‘step-free’.

It is crucial, however, that the way in which these classifications are understood and communicated by operators is done so in a way that is both clear and consistent, and applied universally across the UK.

**6. What are your views on the proposed introduction of mandatory checks on station accessibility information at the assistance booking stage?**

We welcome this proposal which, if implemented correctly and consistency, has the potential to greatly improve the information available to Disabled passengers, giving them a more complete picture of the levels of accessibility at a given station.

**7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?**

We are broadly supportive of this measure.

**8. What are your views on the proposed introduction of an assistance handover protocol for all GB mainline stations to improve the quality and consistency of information communicated between boarding and alighting stations?**

An assistance handover protocol that is used across all mainline stations would be helpful in ensuring a greater level of consistency in the way in which passenger assistance queries are handled. In order to ensure this protocol is being deployed in a consistent manner, we suggest that it is incorporated into regular staff training.

**9. What are your views on the proposed introduction of a dedicated assistance line for all GB mainline stations to improve the reliability of communication between stations during assistance handovers?**

We are broadly supportive of this measure.

**10. What are your views on our training proposals? Do you agree with the proposed outline content?**

We are broadly supportive of the package of measures being proposed for staff training. It is important that this is always based on the social model of disability, and we would also recommend that training is carried out on an annual, as opposed to biannual, basis as has been proposed. We would also recommend that rather than being entirely classroom-based, staff training

should also include a practical element and involve Disabled people as part of the process (e.g. this could include staff going on a train journey with a Disabled passenger).

Furthermore, we would like to see the following elements included:

- Mandatory training on the rights and needs of Disabled people as *cyclists*, including the fact that:
  - (a) Many Disabled people find cycling easier than walking, use their cycle as a mobility aid and are physically unable to dismount and walk/wheel their cycle (e.g. when asked to dismount on a train concourse)
  - (b) Many Disabled cyclists use non-standard cycles to get around (e.g. handcycles, recumbents, tricycles), which are typically longer, wider and heavier than standard bicycles. Disabled cyclists may therefore not have the option to park their cycle at their departure station or hire another at their destination, and may need to store such a cycle onboard a train as part of an integrated journey involving multiple modes of transport

**11. Do you agree that operators should be permitted no more than two years to update and revise their training packages and provide refresher training to all their staff?**

Yes, though ideally this should be limited to one year.

**- The refresher training should focus on priority areas for improvement for the industry as a whole, or should it be tailored to the priority areas for improvement for each individual operator?**

A mixture of the two might be the most optimum approach, with an emphasis on the former.

**12. What are your views on our recommendations for RDG regarding the promotion of assisted travel via Passenger Assist publicity and the issuing of Disabled Persons Railcards?**

Given the fact that the majority of potential Passenger Assist users have never heard of the scheme, it is important that efforts are stepped up to improve awareness around this, including information campaigns carried out by train operators, as well as a general public awareness campaign.

We also welcome proposals to provide a short information leaflet about the Passenger Assist scheme upon issuance of a Disabled Person's Railcard,

which will help improve awareness amongst Disabled people about what forms of assistance they can expect.

**13. What are your views on our proposal to require operators to work with local authorities, service providers and disabled access groups to promote and improve the Passenger Assist service?**

We welcome this proposal and suggest that this be extended to Disabled cyclist groups, so that they are similarly aware of the options that may/may not be available when attempting to use rail services with a non-standard cycle as a mobility aid.

**14. What are your views on the proposal for more prescriptive website requirements?**

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**15. What are your views on the three options we have identified for reducing the notice period for booked assistance?**

Ideally we would like Disabled passengers to be able to book assistance up to a minimum of two hours before travel and for this to be the default setting for train operators. However, we also recognise the challenges this presents for train operators logistically and practically, and so although a two hour minimum is our strong preference, it would also not be desirable to jump into a system that would prove unworkable and leave Disabled passengers worse off in the long run.

**16. Do you consider that any reduction should be phased in? If so, how might this be implemented?**

We would support the phasing in of shorter notice periods incrementally in order to achieve a consistent and reliable booking service in the medium-term, whilst working towards a universally-applied two hour notice period in the long-term.

**17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?**

We are broadly supportive of those measures proposed to mitigate situations where there is an increased risk of assistance not being provided, including the provision of working help points and assistance freephone numbers. However, every effort must be made by operators to ensure that such situations never occur in the first place.

**18. What are your views on the proposal to introduce mandatory redress arrangements for assistance failure?**

We strongly agree with this proposal. It is not acceptable that 1 in 5 train operators either do not provide redress for failed assistance, or do not actively promote this information to passengers. Redress should be available to all Disabled passengers, regardless of train operator. To this end, we support proposals for a universal, mandatory redress requirement for all train operators.

**19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?**

We agree with this proposal.

**20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?**

We welcome the proposals set out in this section, in particular the proposal for all train operators to make efforts to ensure drivers of rail replacement bus services and taxis have received disability awareness training. We recognise that operators are limited in the extent to which they can enforce this; however, we would argue that where access by private hire vehicles to stations is regulated under contract with the station operator, disability equalities training for these drivers should be mandatory.

We also support proposals to require operators to work more closely with third parties to increase available provision of accessible rail replacement services, and to require operators to report to ORR on the accessibility of rail replacement bus services that they use.

It is also important to consider that not all Disabled rail passengers are wheelchair users. For instance, the needs and requirements of Disabled cyclists (who may be using a cycle as a mobility aid) must also be taken into account.

**21. What are your views on our proposal to ensure that at every station passengers are informed how to contact a member of staff that is able to provide assistance and service information?**

We strongly support this proposal and would recommend that, wherever possible, this information be provided in person. Help points and freephone numbers should be a last resort (though we recognise that very small, rural stations have their own unique pressures and challenges in this regard).

**22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?**

As an inclusive cycling charity and the voice of Disabled cyclists in the UK, we know that providing an attractive, whole-journey experience is crucial to encouraging more Disabled people to cycle, who often rely on multiple modes of transport - including trains - to get around. Further, Disabled people are more likely to be adversely affected by a lack of integrated transport modes as they already have to go to considerable lengths to plan a journey. Unfortunately, as our research shows, accessing rail services is all but impossible for many Disabled cyclists who use their cycle as a mobility aid. According to our latest survey of Disabled cyclists, 25% said that they have been refused from boarding a train.

To our knowledge, there are no train operators with an explicit policy permitting the storage of non-standard cycles onboard (with the exception in some cases of tandems). According to an audit we carried out last year, just 1 out of 25 Train Operating Companies made reference to the use of cycles as mobility aids as part of their DPPP. This policy gap (which also highlights a general lack of awareness of the fact that Disabled people can and do cycle) creates a great deal of uncertainty for Disabled cyclists and - for those who decide not to travel by train for fear of being turned away - severely limits the type and length of journey that they are able to make, often forcing Disabled cyclists to use alternative modes of transport and discouraging them from leading physically active lifestyles.

This situation is made even more confusing by the fact that, whilst we know of many Disabled cyclists who have been challenged when attempting to board a train with a non-standard cycle (e.g. a tricycle), we also know of many who have successfully managed to do so without any problems. For instance, as this [blog](#) illustrates, some Disabled people have been able to book assistance with getting their cycle on board via the Passenger Assist scheme. However, despite positive experiences such as these, in practice there remains huge variability and inconsistency in the ways in which different train operators approach this issue, which in turn generates huge uncertainty and anxiety for Disabled cyclists. Below are just a few quotes taken from Disabled cyclists that are evidence of this:

*“I've been challenged when bringing my handcycle on Virgin trains, the Newcastle Metro and the London Underground. In all instances I argued with the people who were challenging me and 'won' the argument, but it is always distressing to be challenged in this way...”*

*“I would love to be able to go to places like Lea Valley... but can't take my trike on the train as it is not viewed as a mobility aid, as a mobility scooter would be”*

*“ScotRail refused to take my tricycle on their trains when I told them it was a trike... When I booked my trike as a bike and took the chance it was found to be absolutely fine to take on board”*

Therefore, in order for Disabled cyclists to feel confident in completing a journey by cycle that involves rail, we have the following recommendations:

1. Where rules exist permitting the storage of wheelchairs and mobility scooters onboard trains, the same rules should apply (where physically and practically possible) to Disabled cyclists who use their cycle as a mobility aid
2. That any information, leaflets or guidance provided by a train operator on the size, weight and types of mobility scooters that may be carried also explicitly outlines its policy on non-standard cycles
3. Disabled cyclists who use their cycle as a mobility aid be exempt from having to dismount on train concourses (our latest survey of Disabled cyclists shows that 1 in 10 have been asked to dismount their cycle on a train concourse, even though they are using it as a mobility aid and despite the fact that for some it might be physically impossible to do so)
4. Where there is scope and it is practically possible for the train operator, scooter permit schemes (like those operated by Great Western Railway) be extended to Disabled cyclists, when using a cycle as a mobility aid
5. Train stations provide adequate facilities for Disabled cyclists, including inclusive cycle parking and cycle hire provision

Wheels for Wellbeing would be happy to participate in any pilots seeking to extend mobility aid permits on trains to Disabled cyclists, and to provide training for train operators on how to meet the needs of Disabled cyclists.

**23. What are your views on our proposals to clarify the guidance to ensure:**

**(a) passengers do not unknowingly purchase tickets they cannot make full use of; and**

We support the proposals laid out in this section.

**(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.**

We support proposals to require operators to consider how they will inform passengers when there is a reduction in the accessibility of train facilities; however, we would like to see this proposal strengthened so that operators are not merely required to 'consider' how they will inform passengers, but have actual, real-time solutions in place.

**24. Do you have any comments on the good practice areas listed? Are there other good practices that should be identified in the revised Guidance?**

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