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

**Final Report**

**May 2015**

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

## Executive Summary

This Report was commissioned by the Association of Train Operating Companies (ATOC) to consider how accessible Britain's railway network will be to older and disabled people by 1st January 2020 (the date by which all rolling stock must meet legal accessibility requirements). The Report is written in the context of the country's changing demographics and the growing number of older people who need and want to continue to travel independently by rail.

The strong correlation between age and disability means that there is a growing need both for physical accessibility across all aspects of rail travel and for practices and policies that give people the confidence to travel. This includes the wide range of ancillary services and facilities (such as ticket purchase and information provision) which are an integral part of rail travel. It also includes current and potential future policies at Government and operational levels which may have an impact on accessibility.

The Report finds that there is strong and consistent progress towards rolling stock compliance with accessibility requirements with Government, the Rolling Stock Operating Companies (ROSCOs) and the Train Operating Companies (TOCs) all working to meet that goal. A number of factors including changes to the refranchising timetable and the electrification programme have caused some delays which put full compliance by the deadline at risk.

The greatest risk factor is posed by the inbuilt disincentive in the franchising process for TOCs to invest beyond the franchise horizon. It is clear that the ROSCOs have the means to complete the process but if the deadline is to be met, there needs to be urgent action from Government and the TOCs to release stock for upgrade.

A comprehensive analysis of station accessibility shows that significant challenges remain. Substantial investment has been made since the launch of the Government's Access for All scheme in 2005: between 2005 and 2020 the percentage of passengers using step-free stations will have risen from 55% to 81%. There is a wide variation across the network in the proportion of accessible stations, with some parts of the country still poorly served. And of course accessibility is only of value if both end of the journey are manageable.

Historical issues at many stations also make access improvements more costly and difficult and a significant proportion of stations fall below new-build standards.

One key issue for station accessibility is whether facilities could be improved for more people by using available resources to bring a greater number of stations up to a reasonable (but not optimal) level of accessibility rather than focussing on achieving "new build" standards of step-free access at fewer stations.

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The Report points to station design issues that can significantly impact on the confidence and safety with which older and disabled passengers can travel and highlights the need for comprehensive policies and plans to ensure that older and disabled people's needs continue to be met at times of delay or disruption. It is important to note that improvements will benefit a much wider population including, for example, those travelling with small children or with luggage.

The accessibility of stations is also affected by the availability of staff either on the train or the platform. 89% of stations are without staff at some or all times of the day even though trains are operating. Given the near universal vertical and horizontal gaps between train and platform, the availability of assistance for boarding and alighting is essential for many older and disabled people.

Policies to reduce staff numbers at stations and on trains risk undermining the levels of accessibility that improvements to rolling stock and stations have delivered in recent years.

There are significant differences between TOCs in the level and frequency of training for customer facing staff. There is a vital need for high quality training to be delivered consistently across the network.

Journey planning and information are also critical factors. The Report identifies the growing use by train operators of internet and social media both for ticket purchase and for updates and information. This risks excluding people whose internet usage remains low, and older people in particular. Closure of ticket offices increasingly mean no alternative to use of ticket vending machines. Current designs are inaccessible to many older and disabled people.

The Report also considers the issue of monitoring and compliance to ensure that accessibility is delivered in accordance with the law and best practice. The Office of Rail and Road (ORR) has the leading role and needs to follow up its proactive stance with regular assessment of the quality of delivery and enforcement of requirements where necessary.

There are clearly many variable factors in the coming years that can affect the progress towards accessibility including franchise changes, electrification programmes and changes in Government policy.

However, the overall assessment of this Report remains an optimistic one provided that commitments to accessibility are not overridden or overlooked as other economic or operational policies are introduced.

# 1 Context

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.

ATOC has commissioned this Report to take a comprehensive look at how accessible rail travel in Britain is today for disabled and older people and at how accessible it will be by 1st January 2020 (the deadline for all rolling stock to be compliant with accessibility Regulations).

# 2. Setting the Scene

This Chapter looks at the factors that establish the broad policy and practical context within which this Report is written, including the demographic picture, current trends in rail travel, the legal background which underpins accessibility and at what we mean by the term "accessibility".

## 2.1 Demographic trends

The population of the UK, in common with much of the world, is ageing. From 1971 to 2012 the proportion of people aged 65 and over increased from 13% to 17% of the total UK population[1]. There are now 11 million people in the UK aged 65 or over[2].

By 2037 it is expected that the number of people aged over 65 will be around 1 in 4 of the total UK population[3]. There is also a significant increase predicted in the numbers of the oldest old. See Chart 1 below.

### Chart 1: UK Demographic Trends



The ageing UK
Percentage of population aged 65 and above
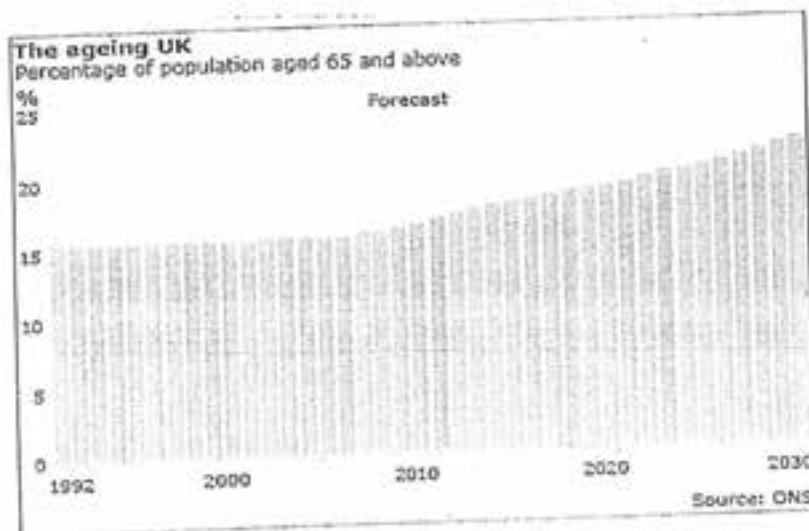
Many older people retain high levels of fitness and mobility into old age. However, there is a strong correlation between age and disability. Over 5 million disabled people are over the state pension age[4]. 18% of adults aged 60-69 have a mobility difficulty, as do 38% of adults aged 70 and over. This is compared with 12% of everyone aged 16 and over[5].

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[1] ONS Mid-Year Population Estimates
[2] \mid-2013 Population Estimates UK Office for National Statistics 2014
[3] ONS UK Principal Population Projections 2012 variant
[4] Gov.UK Disability Facts and Figures, January 2014
[5] National Travel Survey 2010, Department for Transport 2011

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

Data on the prevalence of disability[6] indicates that, across the disability age spectrum, mobility impairments are the most common problem, affecting some 6.5 million people. Another major factor is difficulty with lifting and carrying. Poor manual dexterity affects around 3 million people and problems with communication and with memory concentration each affect around 2.5 million people.

Disability as a consequence of ageing can take many forms but will often bring a combination of factors including some loss of visual and hearing acuity, stiffness of joints and reduction in the ability to walk long distances.

Increasing levels of obesity also have a significant impact on people's mobility and are another important factor in planning for accessibility.

Short term memory loss and more acute forms of dementia are also growing trends. Dementia and related neurological conditions affect 10% of people aged over 65. For those over 85, around 50% have some form of cognitive impairment.

There is always debate about whether future generations of older people will continue to experience the same levels of disability or whether improved healthcare will see people living longer in better health. A report from the Organisation for Economic Co-operation and Development (OECD)[7] based on a study of 12 countries, including the UK, concluded that:

> "Even though disability prevalence rates have declined to some extent in recent years in some countries, the ageing of the population and the greater longevity of individuals can be expected to lead to increasing numbers of people at older ages with a severe disability."

It is important to note that, for the majority of older and disabled people, it is the environment around them that creates the difficulty. Many will not have any problems in environments that are designed without barriers to access. This "social model" of disability is fundamental to an understanding of what needs to be done to make travel accessible to disabled and older people.

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[6] Gov.UK Disability Facts and Figures, January 2014

[7] http://www.oecd.org/els/soc/38343783.pdf

## 2.2 Economic and social factors

Among both disabled and older people, the demand for accessible travel and the expectations of being able to continue travelling are very much higher than in previous generations. The introduction of anti-discrimination and rights legislation has encouraged people to believe that they are *entitled* to find the level of provision that they need to meet their personal requirements.



Figure 1: Disability rights campaigners from 'Transport for All'
(Source: Transport for All website)

Against this trend, however, we also see clear evidence that a loss of confidence among older and disabled people can lead to a loss of mobility. This can often be triggered by one bad experience – a near miss with a bike on the pavement or a rude and unhelpful bus driver, for example - or by a perception of risk. The Royal Voluntary Service Report "Falls: Measuring the Impact on Older People"[8] shows the clear correlation between falling – or a fear of falling – and a loss of mobility.

A loss of mobility very often triggers a decline in both physical and mental health and wellbeing. It also has an impact on the quality of health care that older people receive (when they are no longer able to get out to see a GP or visit a clinic) and on their nutrition if they become dependent on others to do their basic food shopping for them.

30% of older people say that they would like to go out more often.[9]

In parallel with the increased numbers of older people, we will see a stagnation of the numbers of people of working age (a predicted increase of just 4%

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[8]
http://www.royalvoluntaryservice.org.uk/Uploads/Documents/Reports%20and%20Reviews/Falls%20report_web_v2.pdf
[9] TNS Loneliness Survey for Age UK, April 2014

between 2014 and 2037)[10]. This means that there will be fewer working age people to support the large and growing population of older people. This will lead to a shortfall in taxation income to pay for essential services as well as an increased demand on services such as healthcare. For these reasons, continued independence and self-sufficiency into old age is going to be essential both in economic and social terms.

Another key factor is that the current generation moving into older age, the post-war baby boomers, have predominantly not been great public transport users. They are from the generation which had easy access to private and often to company cars and as a result they are less familiar with how public transport works and less confident in trying it out in retirement. This will affect their willingness to travel by train as well as by bus.

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"[11] 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.

It is also important to note that access improvements to stations and rolling stock benefit a much wider population than those who have reduced mobility due to age or disability.



**Lift** to way out & platforms 3, 4, 5, 6

**Luggage trolleys**

Figure 2: Station sign – giving information for: disabled people, parents with buggies, other people wishing to use the lift, and people with luggage

[10] International Longevity Centre-UK "Mapping Demographic Change" July 2014
[11] http://www.royalvoluntaryservice.org.uk/Uploads/Documents/gold_age_report_2011.pdf

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Anyone travelling with luggage or small children will struggle with steps and stairs. So too will people who are obese and pregnant women. To give one illustration, there are currently some 4 million children under 5 in the UK[12]. Parents travelling with small children and infants are much less likely to choose rail as an option in the absence of lifts at stations. The website "My Train Ticket", in a section intended to encourage parents to travel with small children concedes:

*"It can be overwhelming arriving at a train station and facing stairs, platforms and gaps; do you keep the baby in, take the baby out, collapse the pram? Can you ask for help down the stairs or will health and safety rules mean they can't?"*

The concept of Inclusive Design is increasingly widely understood and regarded as the most effective and cost effective approach to design in both the built environment and in transport related infrastructure and vehicles.



The basic principle of Inclusive Design is that it makes things safer, easier and more convenient for everyone. One example is the ticket machines in the Barcelona Metro system which have been designed by blind people. This means that they are intuitive to use and everyone is now able to get their tickets faster and with less stress. As a by-product the operator no longer has to employ staff to stand next to the machines to help tourists and many others understand how to use them.

Figure 3: Barcelona Metro ticket machines – intuitive by design

A second example comes from the Metro system in Boston in the USA.



Here they have discovered that the wide ticket gates, designed for wheelchair users and people with small children or luggage are preferred by all their passengers because they provide more space and more time to get through.

Figure 4: Boston Metro wide-aisle ticket gate

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[12] 2011 Census: Population and Household Estimates for the United Kingdom, Published 17 December 2012

In the context of rail services in Britain it is important to remember the very large numbers of passengers who now have wheeled luggage and whose access needs are therefore similar to those of a wheelchair user or parent with a baby buggy for smooth level surfaces, gentle gradients, automatic doors and lifts as an alternative to stairs.

## 2.3 Current trends in rail travel

Rail travel is a vital component of both local and long distance public transport. Yet the National Travel Survey statistics indicate that older people are the least likely age group to travel by train. See Chart 2 below.

Chart 2: Rail Trips per year by age, GB



Source: National Travel Survey, DfT 2013
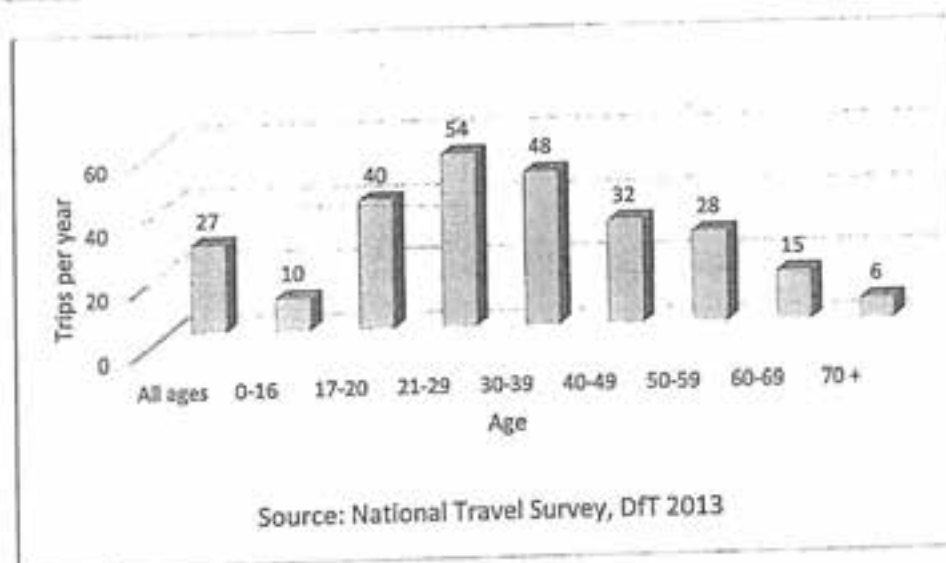
Of course the predominant use of rail travel for commuting and other business purposes explains this fall in usage with age to some extent (although with rising retirement age this position may well change). However, there are other factors that need to be taken into account.

A recently published report for the Office of Rail and Road "Disabled Travellers - Awareness of Rights"[13] 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.

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[13] http://orr.gov.uk/__data/assets/pdf_file/0010/11710/disabled-travellers-rights-awareness.pdf

In contrast, however, we see that train journeys by Disabled Persons Railcard (DPRC) holders have more than doubled in the past 15 years. There are now over 142,000 cardholders across Great Britain who are making more than 4 million train journeys a year (see also 6.2).

Similarly, the Senior Railcard is available throughout the network to anyone aged over 60. By 2013 there were over 1 million Senior Railcards on issue with ATOC records showing that over 25 million journeys were taken in 2012 by Senior Railcard holders. There is also evidence that the average journey length of those travelling on the train is increasing.[14]



Figure 5: Disabled Persons, and Senior, Railcard

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.

## 2.4 What does "accessible" mean?

Accessibility is not and never can be an absolute measure. Everyone with a disability or mobility problem of any kind (permanent or temporary) will have their own perceptions and preferences of what works for them.

In addition, there are many external factors that can affect the accessibility of a station, train or facility. These include:

- Crowding: services and routes which have regular overcrowding at peak times will affect the ability of many disabled and older people to get on board and to travel in comfort at those times;

- Availability of seats: for those people unable to stand on a moving train, there may be difficulties, even outside peak hours, to find a seat on

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[14] http://www.atoc.org/media-centre/previous-press-releases/2013/03/22/grandparents-go-the-extra-mile-to-give-parents-a-break-100815/

services (such as London Overground) which have reduced the number of seats in order to increase overall carrying capacity;



Figure 6: London Overground train with reduced seating capacity

o  Availability of wheelchair spaces: as train travel becomes more accessible and more wheelchair users have the confidence to use the train, one inevitable consequence from time to time will be that all available wheelchair spaces are taken. This applies particularly on trains with only small vestibules at the end of the carriage and therefore lacking the flexibility to accommodate additional wheelchair users. The problem can also be exacerbated by luggage, pushchairs and bicycles stowed in the wheelchair space;

o  On board information: for those people dependent on either visual or audible on-board information, the absence of this facility (because it is out of order or has not been switched on or correctly programmed) can be distressing and stressful. A lack of on-board staff can add to the anxiety this causes;
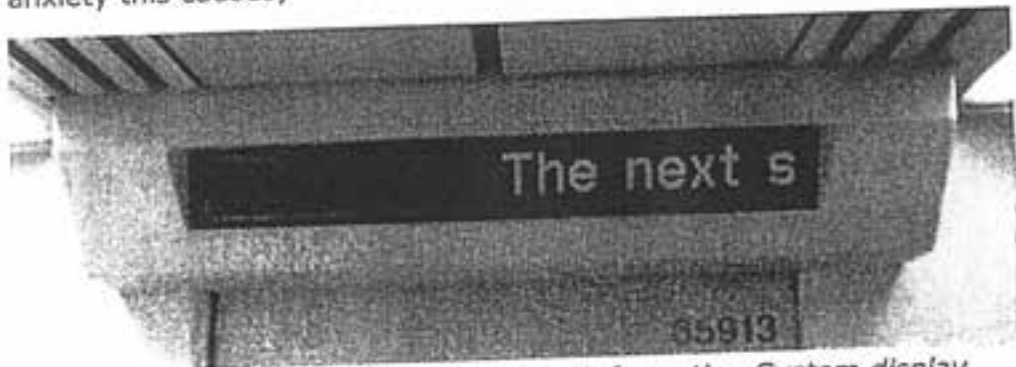


Figure 7: Scrolling on-board Passenger Information System display

o  Time of day: at stations with restricted staffing hours, assistance (and so, for example access to lifts) may only be available at limited times;



Figure 8: Station poster re limited lift operation times (Hazel Grove)

o  Weather: poor weather conditions can affect a disabled or older person's ability to walk any distance or to wait on a station platform, for example;

o  Badly placed equipment: a frequent problem for those people who need an accessible toilet is the careless placement of rubbish bins and other equipment which can make it impossible to manoeuvre or transfer successfully;

o  Availability of toilets both at stations and on trains;

o  Platform slopes: can be a problem for older people with mobility difficulties and are potentially dangerous both for wheelchair users and those travelling with baby buggies. Two such incidents have featured in the press in the last 18 months, one involving a wheelchair user and the other a baby buggy. Both the wheelchair user and the baby rolled off the platform edge on to the track with potentially fatal consequences;

o  Boarding and alighting: a number of design and operational factors can affect the ability of many disabled and older people to board and alight from trains. These include: absence of a ramp, short platforms and big vertical and/or horizontal gaps between platform and train;

o  Availability of staff (on the train and on the station) both to give physical assistance and information/reassurance.

All of these factors need to be taken into account by disabled and older people and others with mobility problems who are planning to travel.

It is also important to recognise the invisible issues that affect many older and disabled people and which become particularly important in the often stressful environment of travel.

For example, emotional and psychological issues cited by many older people include:

- Being easily upset and offended;
- Misunderstanding acronyms;
- Mis-hearing what is said to them;
- Being less maneuverable;
- Preferring not to multi task or consider two things at once;
- Often being single minded on that and that alone;
- Experiencing short term memory loss: "Where did I put my ticket?" "What did I do with my case?" These become big problems with age;
- Valuing their dignity and finding being patronised infuriating;
- Preferring not to hurry or run;
- Being unable to walk long distances without a rest;
- Fearing crowds;
- Feeling unsafe or believing they are unsafe without some reassurance;
- Not all being happy with using e-mail or not connected to email;
- Those who are connected sometimes struggle with IT which should be simple.

Many of these issues, and what they mean for older people's ability to travel by train are explored in more detail in other Chapters of the Report.

There can never be an absolute guarantee of accessibility. However, the standards and definitions used in this report are based on legal and best practice requirements and provide the best possible objective assessment of accessibility of the rail system and infrastructure.

# 3. Making it Happen

There is no single neat piece of legislation that defines accessibility to the rail system and determines how it should be delivered. Instead, the legal requirements for accessibility in the railways are a collection of UK and European based statutes which have appeared at different times over the past twenty years and which affect different accessibility issues in different ways. Details of the legislation applying to rolling stock, stations and passenger rights, is set out in Appendix 1.

This Chapter considers whether the legal and other frameworks currently in place are adequate and appropriate to deliver a consistent high level of accessibility and customer service to older and disabled people in the coming years.

The contractual framework is equally complex, and arguably as significant as the underpinning legislation in determining the approach of Network Rail and Train Operators.

## 3.1 Are the legal and contractual frameworks fit for purpose?

The logic of the Government of the day in introducing the transport requirements of the Disability Discrimination Act 1995, was that access to rail rolling stock (and indeed to buses) could only properly be determined by setting clear technical standards which had to be met and which would be checked and inspected before new stock went into service. They took the view that there was no point in requiring accessibility to a confined space like a vehicle unless you spelt out very clearly what accessibility looked like.

That logic, translated into the Rail Vehicle Accessibility Regulations of 1998 and now encapsulated in large part in the PRM-TSI, has, on the whole, served its purpose well in setting clear minimum standards.

The decision to set an "end date" by which all rolling stock must be compliant was taken after the Regulations came into effect and after considerable debate. Disability organisations were calling for a deadline of 2010 and the industry was pushing for 2030! The choice of 2020 was felt to address both the impatience of disabled people to see progress and the legitimate concerns of industry about cost and feasibility.

The contractual framework (through the Franchise agreement) is also key in determining the accessibility of rolling stock and services. However, without thorough and systematic enforcement of contractual conditions, intended benefits are often lost. There is also a significant issue that the current contractual framework does not support making investment decisions within the necessary planning horizons.

The requirement that physical features that inhibit access be removed has also clearly been a major challenge at many stations and although the Access for All

Fund is gradually tackling the large number of stations without step free access to or between platforms, there is still some long way to go.

On top of these domestic requirements we have seen more recently the introduction of the European Passenger Rights Regulations (Rail Passengers' Rights and Obligations (Regulation (EC) 1371/2007). The provisions dealing with the rights of disabled passengers are lifted almost entirely from the Air Passenger Rights Regulations (Regulation EC 1107/2006). Similar provisions have been made for bus, coach and maritime services.

While the concept of Passenger Rights is welcome, there is evidence that there are very low levels of awareness among older and disabled people that those rights exist (not only in the rail sector but also across other transport modes).

## 3.2 Responsibilities

The European Regulation places responsibility on *"railway undertakings and station managers"* to work with organisations representing disabled people and people with reduced mobility to *"establish or have in place non-discriminatory access rules"*.

The same Regulation also places responsibility on railway undertakings and station managers to provide assistance (but only at staffed stations). At unstaffed stations the requirement is limited to a clear information about the nearest staffed stations and available assistance.

Assistance on board is also stipulated in the Regulation but with the proviso that 48 hours' notice must be given. Without this notice period, the operator must make "all reasonable efforts" to provide the assistance. This requirement is copied from the Air Passenger Rights Regulations (Regulation (EC) 1107/2006) although it could certainly be argued that the need for spontaneous travel is more important in the context of rail than air travel.

The Disabled People's Protection Policy (DPPP) which every TOC has to produce requires train operators to ensure assistance is available to disabled passengers and they have the resources and management expertise to deliver this assistance. These requirements are now monitored and enforced by the ORR.

Specific requirements include:

- o Explaining how to use Passenger Assist, where disabled passengers can book ahead for travel assistance to board or disembark from a train;
- o The additional information about station access and staffing to help manage the journey, this includes providing alternative transport to take disabled passengers to the nearest or most convenient accessible station from where they can continue their journey;
- o Promptly updating information on planned engineering, rail replacement or work on stations that may affect access or use of rail by disabled

people; and;

○ Advice for helping disabled passengers during disruption, for example where a short-notice change of platform is announced.



Figure 9: Each TOC produces a Disabled People's Protection Policy (DPPP)

## 3.3 Staff Training

The European Passenger Rights Regulation covers both rolling stock and station access but, unlike the other modes, does not include staff training in accessibility issues as a fundamental requirement.

However, the PRM-TSI does require professional training of:

- Staff accompanying trains, delivering help to passengers at a station and selling tickets;
- Engineers and managers responsible for maintaining and operating trains.

The DPPP Guidance also mandates that all staff will receive relevant disability awareness training or disability equality training, including senior and key managers to ensure that they are aware of their responsibilities to disabled passengers. Frontline staff are also required to have appropriate training in the use of equipment such as ramps, wheelchairs and induction loops.

However, although many TOCs do provide training in Disability Awareness and Disability Equality, at least to front line staff, the quality and duration of training (initial and refresher) varies considerably.

It is essential that consistent levels of training (both in terms of quality and frequency) are delivered across the network. It is of no help to disabled and older passengers to find well trained staff at one point of their journey and not

at another. This is another example of the absolute necessity of a coherent and joined up approach across all the TOCs and Network Rail.

The type of training and its duration will depend critically on the role of the person being trained. For example, it is common to use e-learning programmes to give staff who are not in the front line of customer service a good feel for both legal requirements and best practice. E-learning has the benefit that it can be done with minimum loss of time away from other work.

The PRM-TSI requirement for training to extend to engineers and managers is extremely welcome and should be delivered systematically and thoroughly. For engineers it should be a fundamental part of basic training and one that should be regularly updated and refreshed.

For staff who work directly with the public including drivers, ticket office or other information staff and, of course, any whose specific role is assisting disabled people, the training must be much more detailed. For these staff, e-learning may be a useful way of refreshing or reminding them about key issues but it is not an acceptable or suitable medium for detailed learning.

For front line staff, training should include a significant element of learning about different disabilities and the right way to interact and communicate with disabled people. Engaging both disabled and older people to help with the delivery of training is important – provided that those involved are experienced trainers and able to provide a broad perspective on key issues and not just anecdotal evidence based on personal experience.

A clear emphasis on understanding the customer experience is also valuable. For example, spending a day travelling on the system with an older or disabled person can be a very enlightening experience. A clear emphasis on understanding the customer experience is also valuable.

In addition for those staff providing physical assistance to disabled people, hands-on training in how to push a wheelchair user or escort a blind person etc. is equally important. Those who may be handling mobility equipment (such as folding wheelchairs) also need a clear understanding of the correct way to do so without damaging the equipment or themselves.

Training also needs to cover procedural issues such as what kind of information and assistance needs to be provided at a time of delay or disruption to people who are blind or deaf, for example, or those with learning disabilities. There also need to be established procedures (covered by training) for evacuation of the train by wheelchair users and older people who may be unable to climb down to track level, for example.

The Chartered Institute of Logistics and Transport (CILT)[1] note "Empowering Staff; Enabling Passengers" provides some useful guidance.

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[1] http://www.ciltuk.org.uk/Portals/0/Documents/ProSectors/AccInc/empowering_enabling.pdf

## 3.4 Satisfaction Levels and Complaints

The Report from Transport Focus "The Experiences of Disabled Rail Travellers: National Rail Passenger Survey 2013" [2] noted that passengers with a disability were significantly less satisfied than passengers generally with:

- o Provision of information about train times and platforms
- o Personal security
- o Provision of shelter facilities
- o Ease of getting off the train.

However, overall, satisfaction levels among disabled people who are currently travelling are high (79% of respondents said that they were satisfied).

The ORR's 2014 Rail Passenger Experience Report [3] notes that:

*"Disabled passengers share many of the same concerns as passengers overall with punctuality and reliability of trains a key concern. There is some evidence that rail services are not serving disabled passengers well on every occasion: additional assistance is not always working smoothly on the day, facilities such as ticket vending machines are not always accessible to disabled passengers and disabled people feel slightly less safe compared to passengers overall",*

The ORR report also indicates that many passengers are unaware of their rights for redress and compensation for poor performance and notes that disabled people are less satisfied than other passengers about how their claim for compensation was handled by the train operator.

National Rail's website Disability On Board [4] encourages disabled people to complain about bad service and gives advice on how to do so.

The Transport Select Committee's review of transport accessibility [5] concluded that disabled people were not currently well enough informed about their rights and recommended that:

*"The Office of Rail Regulation [6] should work with the train operating companies and launch a widespread campaign to ensure that disabled people are aware of their rights regarding accessibility to the rail network, including receiving a taxi to the nearest available accessible station if necessary."*

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[2] http://www.passengerfocus.org.uk/research/publications/nrps-and-bps-accessibility-analysis-2013
[3] http://orr.gov.uk/__data/assets/pdf_file/0003/11748/rail-passenger-experience-report.pdf
[4] http://www.disability-onboard.co.uk/train-travel-tips/make-a-complaint/
[5] http://www.publications.parliament.uk/pa/cm201314/cmselect/cmtran/116/116.pdf
[6] Now the Office of Rail and Road

# 4. Progress towards Rail Accessibility

This Chapter gives a brief overview of the accessibility of rolling stock and stations now and by 1st January 2020.

A detailed analysis of both rolling stock and stations is found in Appendices A & B to the Report.

## 4.1 Summary of rolling stock accessibility

Rolling stock is made up of vehicles which are put together to form a unit. The number of vehicles forming a unit vary. In some cases a number of units are put together to form a train (e.g. 3 units of 3 vehicles each forming a 9 vehicle train).

The broad picture that emerges from the analysis of rolling stock (as at January 2015) is that, currently, around 51% of units and 56% of vehicles are compliant with accessibility standards. Appendix A sets out the accessibility position by route and by TOC.

A number of factors set out below put full compliance by the deadline of 1st January 2020 at risk. We estimate that 95% of the fleet could be compliant. In the end it will depend on new trains coming into service and on electrification programmes.

In addition, some train units will be withdrawn before 2020 and possible franchise changes due to take place before 2020 will also need to be factored in.

There is clear evidence that the industry, with the help of the Department for Transport and the Rolling Stock Operating Companies (ROSCOs), is doing its best to tackle the basic upgrades that are needed to achieve compliance by the deadline of 2020.

However, the impact of delays to the refranchising programme and uncertainty over electrification have had a significant effect on the available time and resources to meet the deadline. ROSCOs estimate that there can be 9 – 12 months design work needed before some types of refurbishment work can be started and that the necessary technical expertise is also in short supply. There is also a lack of available drawings for some of the older stock, the ownership of which has changed hands as companies have been sold on, which may cause further delays.

Nonetheless, work is in progress and there is a clear focus on the deadline. For example, the Class 317s and Class 321s each have a refurbished unit in service currently to test the viability of moving to full compliance. It is also noted that not all compliance upgrades need to be scheduled as part of heavy maintenance, for example Passenger Information Systems (PIS) and push buttons can be done on depot. The major work on wheelchair spaces and toilets does, however, require significant operational downtime as part of the heavy maintenance

schedule.

Some technical challenges also remain. For example, the PIS fitted in different types of stock is not always compatible so where units are joined together, although each may have a compliant PIS system they cannot talk to each other to provide a compliant service to passengers.

Other units which are life expired although serviceable are likely to be scrapped. Pacers (the class 140s) will probably go before 2020, not because they are life expired but because they have become unacceptable. Many have old fashioned bench seating and their inward opening doors have steps which make access difficult. However, where refurbishment is an option we may continue to see Pacers beyond this deadline.
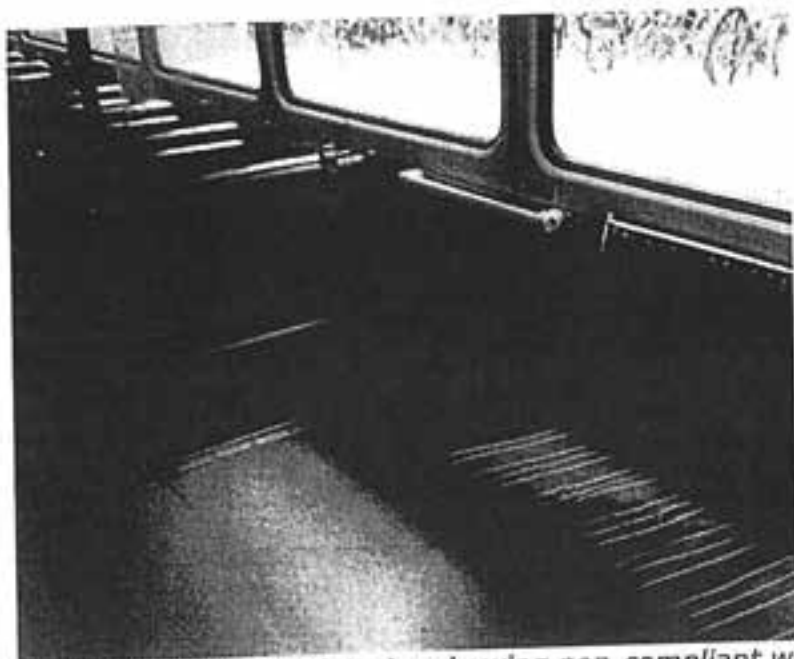


Figure 10: Class 142 interior showing non-compliant wheelchair space

It is difficult to be precise at this stage about other changes which may take place as a result, for example, of electrification programmes which could release some compliant Diesel Units to replace others that are non-compliant.

While there is satisfactory evidence that compliance issues for the most part will be addressed by 2020, there is a range of other items which have a negative impact on accessibility. These are listed in Appendix A (sections A2, A4). For example, Class 375 trains have open/close door buttons in the opposite position to the almost identical Class 377s.

There are other issues which appear illogical – for example a train with a non-accessible toilet is not compliant, but a train with no toilet may be, even though for many older and disabled people a non-accessible toilet is far more useful than no toilet at all.

In addition, there are stations with step-free access to platforms which are served by "compliant" rail vehicles, and yet have no staff on the train and no staff on the station to provide assistance and so are not accessible to many older and disabled people.



*Figure 11: Bayford station – this platform has step-free access, but the station is unstaffed, and all trains calling here operate without a Conductor*

There needs to be clarification of features which are helpful to older and disabled passengers but which are strictly outside compliance legislation.

## 4.2 Summary of station accessibility

For new and refurbished stations, mandatory design standards apply covering a wide range of accessibility issues (including the PRM-TSI[1] and the Department for Transport Code of Practice[2]). However, these standards are not retrospective, and many stations were built when accessibility was not a consideration, in some cases over 150 years ago. There is no 'end date' as with rolling stock, obliging operators to bring stations up to new-build standards. As a result, there is, and will continue to be, a very wide range in the quality of station design and accessibility.

To provide a comprehensive picture of station accessibility, analysis was undertaken of published sources of information such as ATOC's 'Stations Made Easy' website pages. Data was cross-checked with station operators. In addition, site visits were made to a random sample of 40 stations and detailed data collected.

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[1] http://ec.europa.eu/transport/modes/rail/news/doc/tsi/regulation_en.pdf
[2] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/3191/accessible-train-station-design-cop.pdf

A key issue is step-free access between street and platform. Substantial investment has been made since the launch of the Access for All scheme in 2005: between 2005 and 2020 the percentage of passengers using step-free stations will have risen from 55%-81%. Full details are available in Appendix B.



*Figure 12: Access for All lift scheme under construction at Thornton Heath*

Despite the progress, there remains a wide variation across the network. For example, Arriva Trains Wales has 61% of stations with step-free access to all platforms, but Thameslink/Great Northern has only 28%.

The interface between platform and train is another significant accessibility issue, and not only for passengers needing step-free access.



There is a wide variation in platform dimensions across the network, and therefore the height of the step up to the train, and the horizontal 'gap'. A 40cm (15.7 inch) step up is not uncommon, which represents a major barrier to access. The degree of variation in platform height is understood to be a constraint on improvements to train design. The Rail Delivery Group is currently focussing on the platform-train interface issue.

*Figure 13: A large step up to trains at Shrewsbury*

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

Appendix B gives details of a range of other accessibility features. In many cases a significant percentage of stations fall below new-build standards. For example, only 37% of stations in the sample have tactile warning strips on the top and bottom of all stairs. To address these historical issues, station operators have invested in many improvements through Minor Works programmes (in most cases mandated by Franchise Agreements) and sourcing of third party funding. Where new facilities are installed, these are required to meet the applicable standards.

The overall picture is very much one of continuous improvement. Nevertheless, substantial barriers to access at stations still exist, as set out in detail in Appendix B.

Table 1 below summarises the current and likely future position.

### Table 1: Station Step-Free Access 2005 - 2020

|  | 2005 | 2015 | 2020 |
|---|---|---|---|
| Percentage of stations which meet new build access standards (Category A as described in Appendix B) | 14% | 20% | 24% |
| Percentage of stations with step free access but not meeting new build standards (Category B stations as described in Appendix B which are useable by most PRMs but do not meet new build standards) | 30% | 31% | 31% |
| Percentage of stations in both categories above | 44% | 51% | 55% |
| Percentage of total passenger numbers using stations as above | 55% | 73% | 81% |

# 5. Bridging the Gaps

This Chapter tackles the vitally important issues of access to platforms and bridging the gap between platform and train.

Unless workable solutions are found to both these concerns, the numbers of older and disabled passengers able to travel by rail will be significantly curtailed. For many, getting across to platforms and on to trains is a struggle. For others, including wheelchair users it is simply impossible.

This is also an issue that affects many people travelling with small children and baby buggies or with luggage.

## 5.1 Step Free Access to Platforms

Much of the network dates from an era when accessibility was not considered, and this historic legacy creates many problems.



Figure 14: Drayton Park (adjacent to Arsenal Football Club's Emirates Stadium) – access to platforms is via steps only

There has been significant investment since 2005, with the launch of the Government's Access for All fund. TOCs have also invested in step-free access through their 'Accessibility Minor Works Fund' where applicable, and many have been able to obtain additional third party funding.

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

Despite recent investment, out of 2,537 stations, only 509 (20%) have step-free access between street and platform to a 'new-build' standard (i.e. level, short ramps or lifts). The network falls well behind what might be expected in other sectors, e.g. retail or entertainment.

To understand this better, for the purposes of this Report, all stations have been allocated into one of 5 categories. Full details are contained in Appendix B but in brief these are:

- A – New build standard
- B – Considered useable
- C – Sub-optimal access to all platforms
- D – Step-free to some platforms only
- E – No step-free access

The inclusion of Category B is a matter of judgement. At these stations, access conditions do not meet current standards, but for many people with reduced mobility the station will be usable. Barriers to access will still exist at these stations for some passengers.
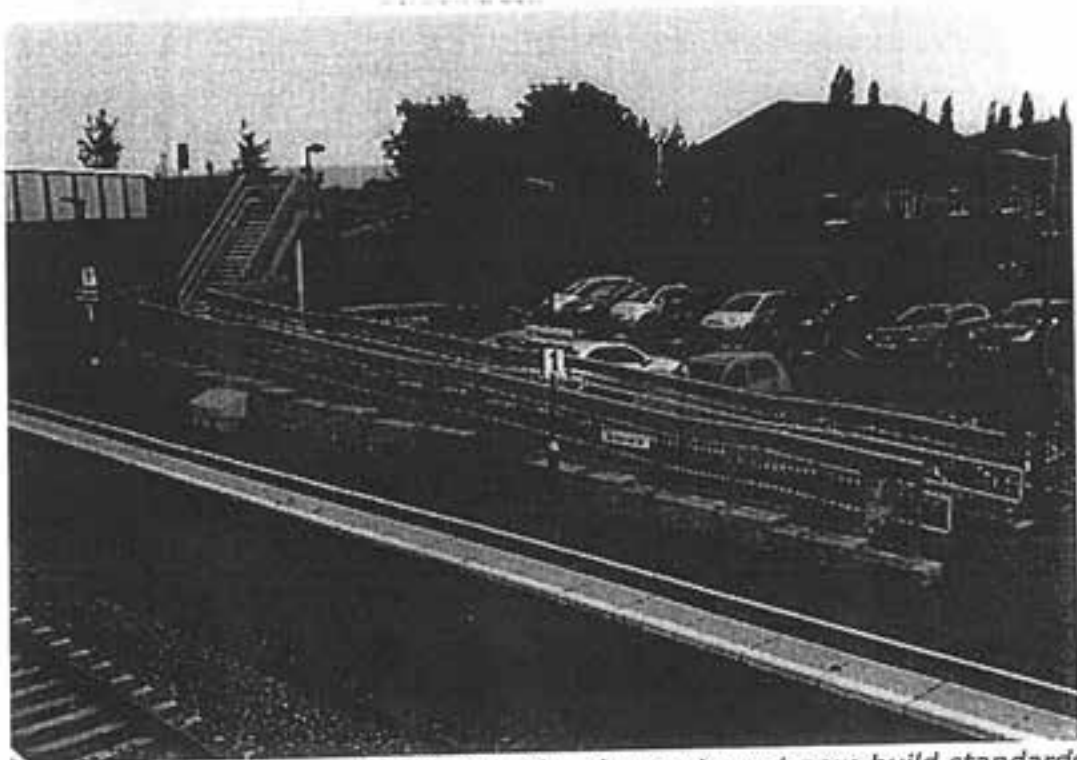


Figure 15: Honeybourne (Category B) – does not meet new-build standards, but the station is considered usable by many people who need step-free access

Typically, Category B stations are already advertised as 'step-free' by TOCs. 786 stations (31%) are in Category B, so 51% of all stations are usable by most people who require step-free access. These stations account for 73% of all passenger numbers.

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

Significant progress has been made since 2005, and will continue to be made between now and 2020. Many improvement schemes are either underway or funded during the period 2014 – 2019 (described as Control Period 5 in Network Rail's Delivery Plans). Tables 2 & 3 below show improvements over time for the percentage of stations, and the passenger numbers affected.

**Table 2: Step-free access: % of stations by Category 2005-2020**
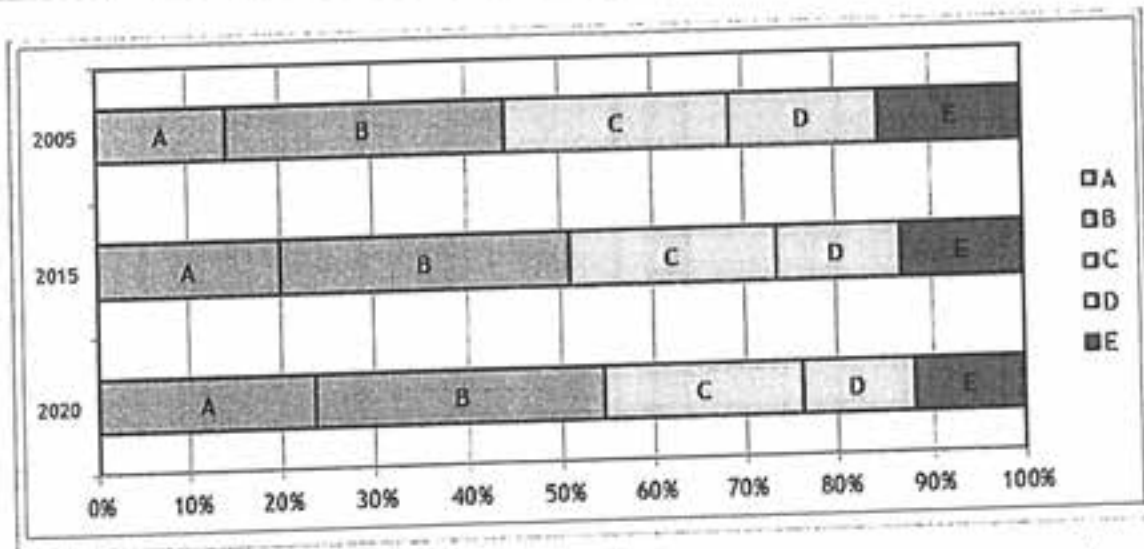


**Table 3: Step-free access: % of passenger numbers at stations by Category 2005 - 2020**
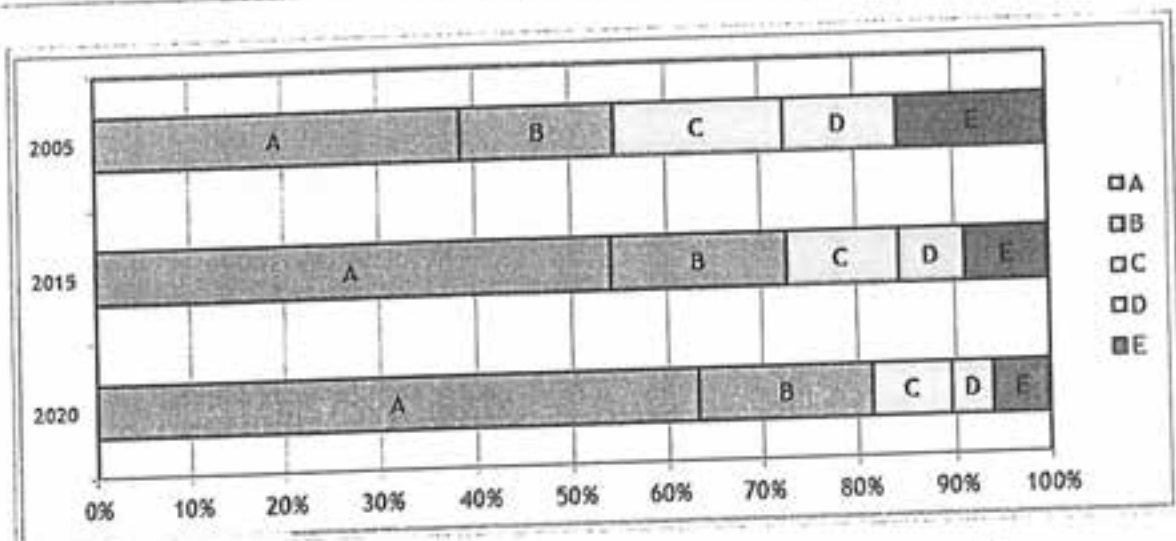


Improving step-free access is not cheap, at an average cost per station understood to be around £2.8m for schemes including lifts. Stations improved through the 'Access for All' fund have been selected on the basis of passenger numbers, census data on disability, 'reasonable geographic spread', scheme practicality, and to some extent scheme cost.

It is clearly unrealistic to plan to spend many millions of pounds bringing every station up to standard. It would take an enormous number of years at present rates and many of them – by nature of their footfall and existing physical features - would not justify such expenditure.

### 5.1.1 Access for All Fund

At present the Access for All Fund is used almost exclusively to achieve Category A status. There are also benefits in moving stations from E to D, D to C, and in particular from E/D or C to B. In some cases the benefits in moving from B to A are marginal when considered alongside scheme cost.

However, the relative scale of such benefits has not been assessed, and the Transport Select Committee[1] recently highlighted the lack of a quantitative methodology for evaluating accessibility investment decisions. If such a methodology could be devised, one option would be to consider whether there are greater benefits in a more flexible approach.

In particular, the costs of moving a station into Category B may be significantly lower than a Category A scheme. Given limited resources, there may be a trade-off between the number of stations which can be improved, and the quality of those improvements. It might be possible to move 5-10 stations from C/D/E into Category B, for the same cost as moving one station into Category A, and this may deliver greater accessibility benefits. This will not always be the case, but opportunities may exist.

The old adage "don't let the best be the enemy of the good" may be worth remembering here.

### 5.1.2 Other options

Some improvements can be made at low cost, particularly when moving stations from Category E to D, or D to C. There are still benefits in such improvements, journey opportunities are created, and where the cost is low this might be considered a 'reasonable adjustment' – for example where a fence has to be removed; a gate made available; or a short ramp built.

Many stations provide possible opportunities for low-cost step-free access improvements[2]. As an example, a short ramp to Platform 4 at Tulse Hill would enable return step-free journeys to London Bridge (in one direction via West Norwood and a same-platform interchange).

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[1] http://www.publications.parliament.uk/pa/cm201314/cmselect/cmtran/116/116.pdf
[2] For example Achnashellach; Addiewell; Ashwell and Morden; Bushey; Bynea; Castle Bar Park; Cheshunt; Chessington South; Cuffley; Cynghordy; Deganwy; Dockyard; Eccles Road; Hale; Harling Road; Hindley; Honley; Lapford; Mouldsworth; North Road; Radlett; St Margaret's; Totton; Tulse Hill; Waddon; Wandsworth Road; and Woodgrange Park.
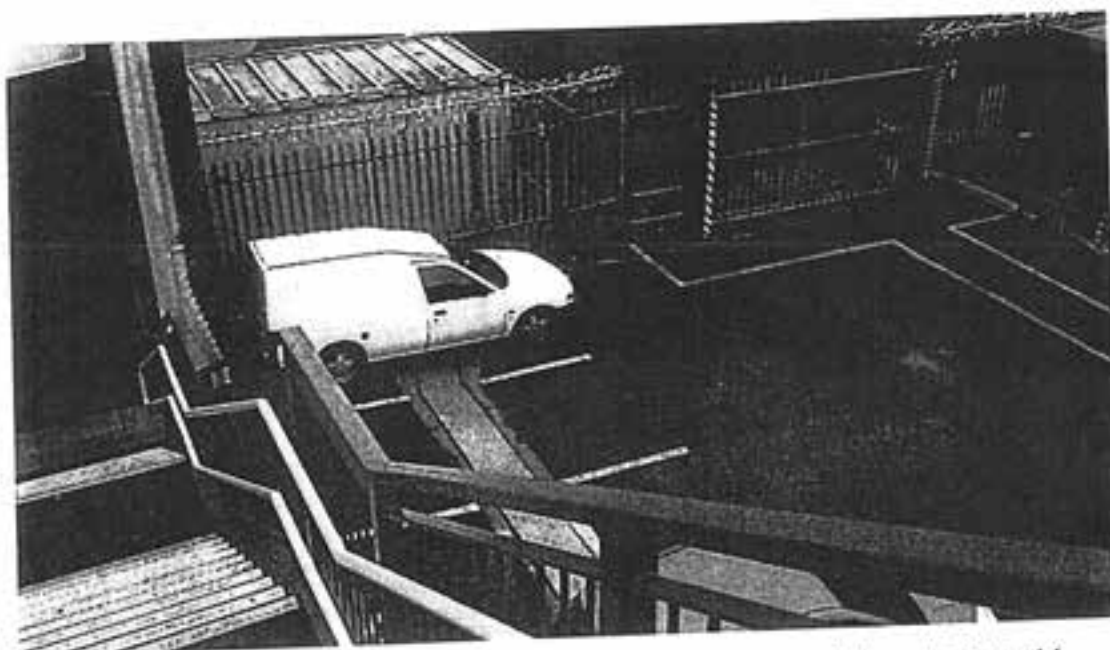
Figure 16: Tulse Hill – a short ramp where the white van is located would provide step-free journey opportunities to and from central London

In some cases, lifts provided under the Access for All fund are not available when the station is unstaffed but when trains are running. As all Access for All lifts are capable of remote operation, it would seem that extending the operating hours, to cover all times trains are running, is possible and relatively easy to achieve.

Some lifts are released by staff on request. There may also be benefits in enabling passengers to operate the lift themselves.



Figure 17: Maidenhead – passengers must wait for the lift to be released

At 134 stations (5%) there are pedestrian foot crossings (also known as 'barrow crossings') available for use. In most cases these are at stations with low passenger numbers, and are the only method of gaining step-free access to one or more platforms. These crossings vary in quality and accessibility. Some have full barriers, some warning lights, but many are ungated and have no visual or audible warning of an approaching train.
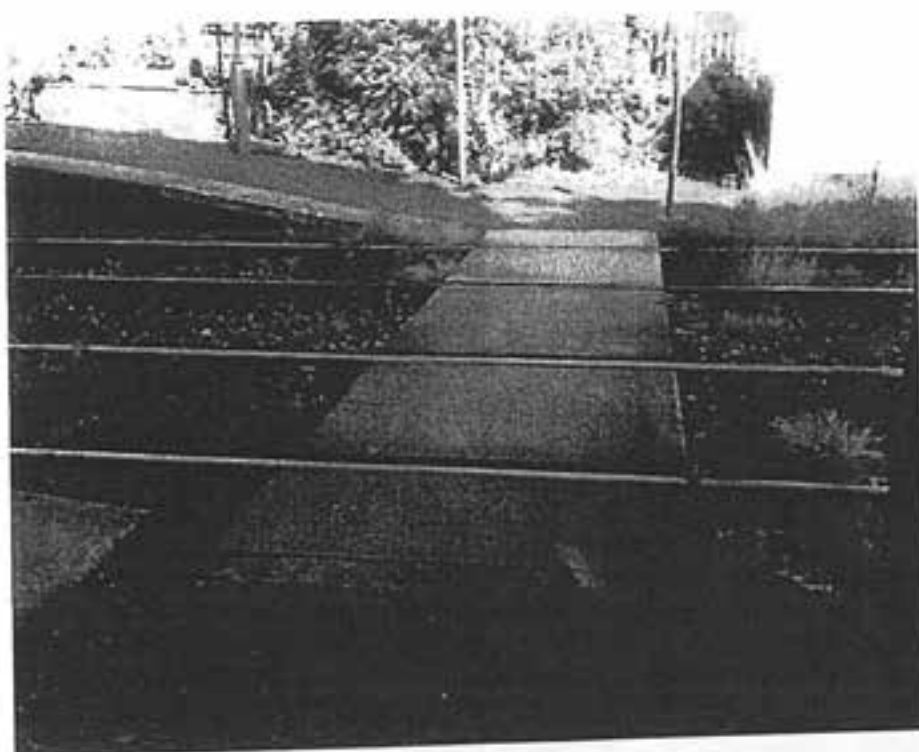
*Figure 18: Llanwrtyd – pedestrian foot crossing providing step-free access between platforms – but without warning lights or barriers*

Fitting audible warnings and red flashing lights to barrow crossings, where they already exist, would provide an accessible route between platforms where there is a relatively poor case for lift installation.

## 5.2 The Gap between Platform and Train

Equally important is the gap between train and platform which can be challenging for many passengers and, in particular those with limited mobility or poor vision.

There is always a vertical (step) and horizontal (gap) between the train and the platform in mainline rail services. This is inevitable at all stations with curved platforms, those served by trains with different stock types with a range of floor/step heights etc. and those with through trains passing at speed. The gap is needed to allow for the sway of the train as it passes through the station. Without it both train and platform would be damaged.

At a very small number of platforms (fewer than 30) the distances are small enough to permit step-free access, as defined in legislation (no more than 75mm horizontal and 50mm vertical). However, at over 99% of stations, a portable ramp must be used, deployed by trained staff. At present, no train in Britain has an automatic ramp, and there are significant technical and cost barriers preventing the development of this potential solution. In any case, under the

Rail Vehicle Accessibility Regulations (RVAR), contractual arrangements, and arguably for safety, equality and customer service reasons, staff are required to provide assistance to wheelchair users when using a ramp (in the case of RVAR when the ramp is at more than an 8% gradient).



Figure 19: Platform-train ramp stored at York

In general, ramps are carried on-board trains, and are available at many stations (55% of surveyed stations). Ramps may be deployed by station staff or by roving or on-train staff. 13% of surveyed stations are unstaffed at times while also being served by trains with no member of staff on board to assist. The issues of staff availability to provide assistance are discussed in full in Chapter 6.1.

To meet the requirements of the PRM-TSI, as well as for safety and manual handling reasons, the gradient of a ramp must be no more than 18%. This means the minimum length of the ramp will be determined by the vertical distance (step) between the platform and the train (see below). However, there is also a requirement for a minimum turning circle for wheelchair users between the bottom of the ramp and the fence/ nearest obstruction on the platform (1.5m), which may limit ramp length. And it is not practical to carry on-board trains a large selection of ramp lengths. Given typical platform characteristics, it is therefore often not possible to meet these minimum standards, and this may impact on the ability of some people to travel.
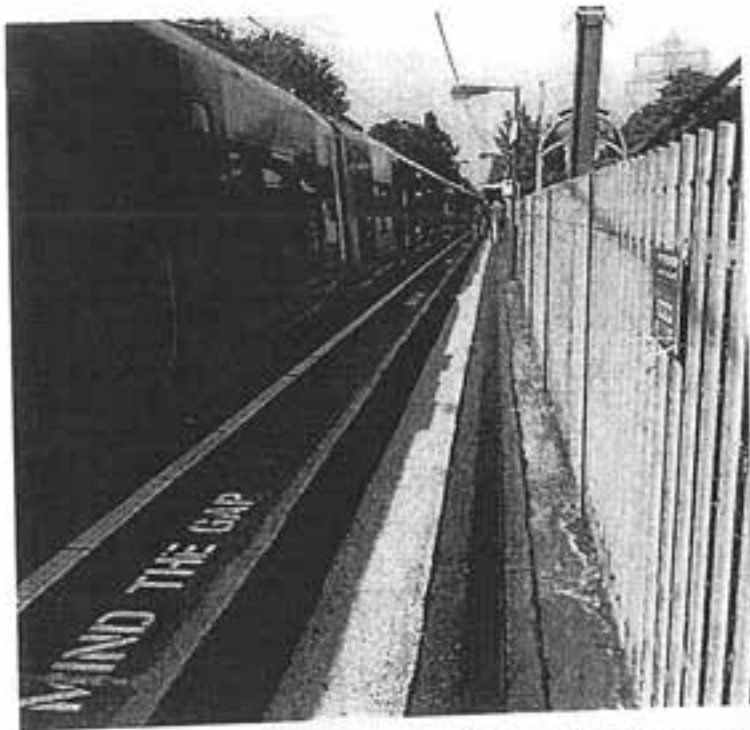
*Figure 20: Narrow section of platform at Bournville*

At only 33% of surveyed stations were all platforms wide enough/ unobstructed to meet the minimum new-build ramp gradient and turning circle requirements. It should also be noted that Network Rail is still building new platforms to an inadequate width of 2.5m (as set in its own Group Standard).

## 5.2.1 Stepping distance

Many older and disabled people have no difficulty with an ordinary step. However, at many platforms the step and/or the gap between the platform and the train is very large. This issue affects all passengers and also has an impact on station dwell times and safety.

At 33% of surveyed stations, the step and/or the gap between the platform and the train was estimated at greater than 25cm in places. At some platforms, vertical distances in excess of 40cm have been observed. This is likely to be a significant barrier to access for many older and disabled people, and other people with reduced mobility, for example those travelling with small children.

There has not been significant investment in reducing full-length platform-train stepping distances, although there are some examples, such as Elephant and Castle, where prefabricated sections have been laid to raise the platform height.

There is an ongoing programme of installation of platform humps (also known as 'Harrington Humps'). Typically, these reduce stepping distances at one or two train doors only (but do not provide level access, unlike similar humps on London Underground). Although these humps are relatively inexpensive, there

are concerns about usability and compliance with accessibility regulations, e.g. the inclusion of a steeply sloped ramp around the hump, and the ability of alighting passengers to identify where the hump is located. The humps do not appear to be a solution to the issue of stepping distance at busy stations.



Figure 21: At St Albans Abbey the Hump does not line up with the wheelchair-accessible doorway – passengers may step down onto a sharply-sloped area

## 5.2.2 Platform design and layout

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. This problem can be exacerbated where there is pressure on staff to keep station dwell times to a minimum, either as a matter of course or in response to late running. German Railways (DB) has a simple system which indicates with boards on the platform where each car will stop.

At stations with low passenger numbers, it is not uncommon for platforms to have gravel or uneven surfaces for some or all of the platform length. This may cause difficulties for some passengers boarding and alighting.

Some trains are longer than the platforms they serve. This causes a range of problems, e.g. where wheelchair-accessible doorways stop off the end of the platform, or where passengers may be required to move down the train to alight.
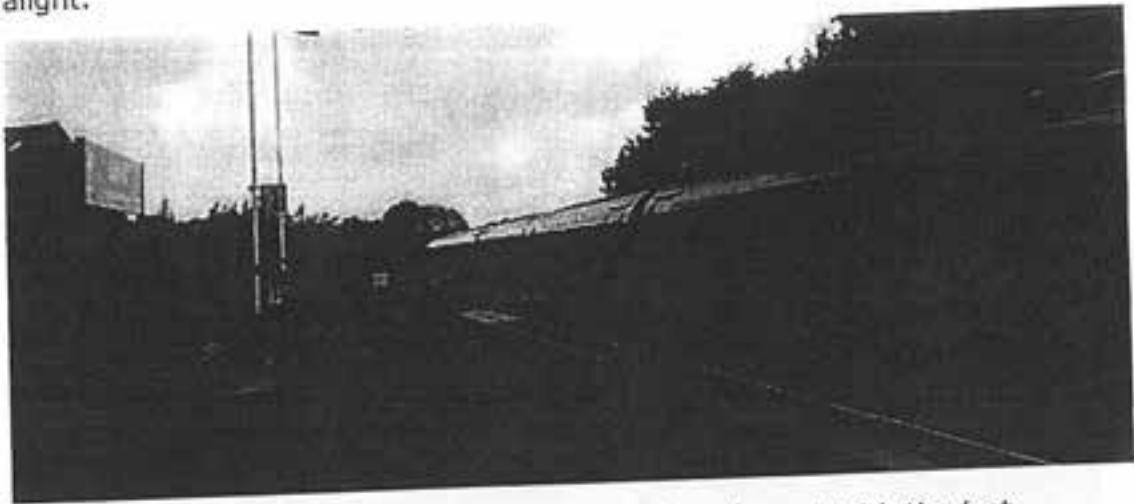


*Figure 22: Mirfield – this Grand Central train has stopped with the last (wheelchair-accessible) carriage off the platform*

There are rules on the marking of the area where passengers may be vulnerable to the slipstream effect of passing trains. This area is marked with a yellow line set back from the edge. 35% of surveyed stations had a tactile strip to warn passengers of the platform edge. However, this was always placed nearer to the platform edge than the yellow line (if present), so that passengers unable to see the yellow line would have to be within the danger area before detecting the strip.
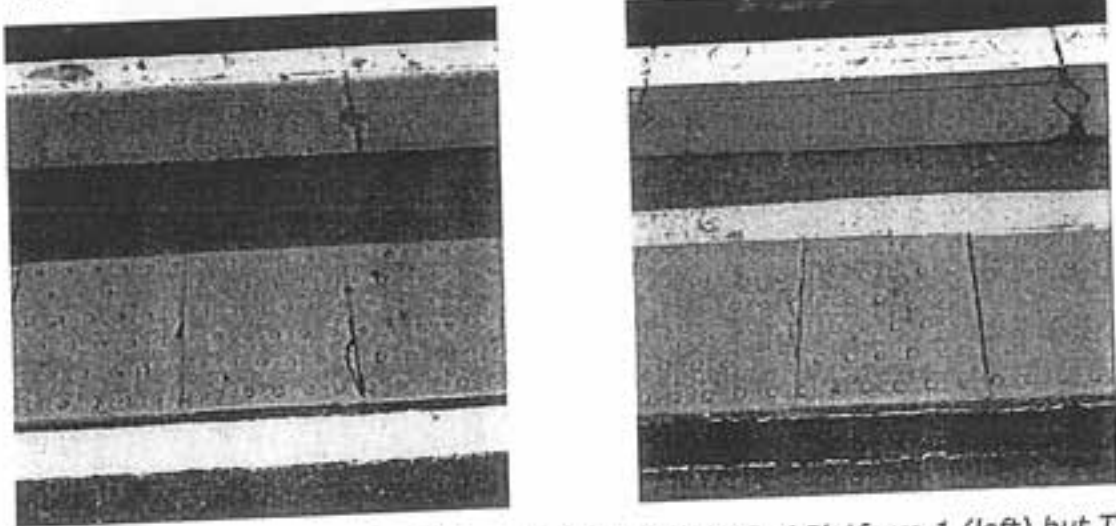


*Figure 23: At West Croydon Network Rail has specified Platform 1 (left) but TfL has specified Platform 3 (right). The two platforms are adjacent sides of the same island, with the obvious potential for confusion*

Only 50% of surveyed stations had audio announcements on platforms. Where announcements are not provided, this means that passengers cannot be warned of the approach of a passing train.



*Figure 24: Llangammarch – this station has a real-time visual display but no audio announcements*

# 6 Travelling with Confidence

This Chapter explores a wide range of actual and potential features of rail travel that can affect both the physical ability and the confidence of older and disabled people to travel on the national rail network.

## 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.



Figure 25: Yoker station is unstaffed at all times

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.
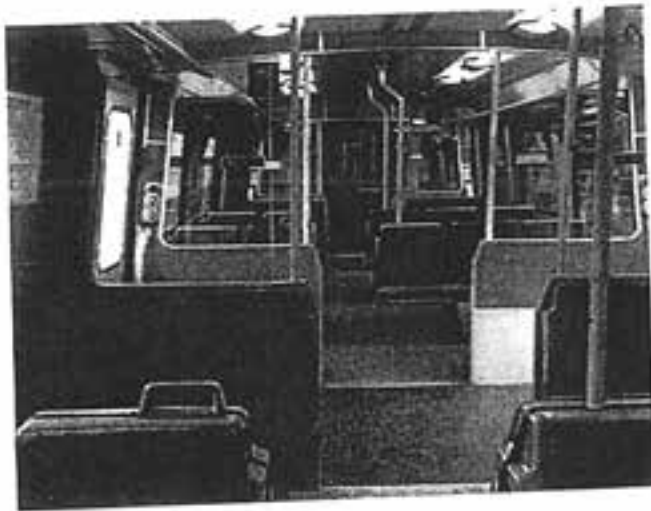
Figure 26: Class 315 Driver-only train as operated by Greater Anglia. No on-board staff are available within the passenger areas

The actual operation of the trains themselves is not affected by this issue as it does not touch on safety aspects which are adequately covered by the Driver and his or her interface with in-cab technology, signalling and with communications systems to Control and Signalling Centres.

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[1]" 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"

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.

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[1] https://www.gov.uk/.../realising-the-potential-of-gb-rail-summary.pdf

# On Track for 2020? The Future of Accessible Rail 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[2].

Transport Focus research in 2009[3] commented, for example;

> "All our research indicates passengers really like the re-assurance 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"[4] 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 meets 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[5]).

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.

[2] Passengers Perceptions of Personal Security on Public Transport, Independent Social Research 2009
[3] Passenger perceptions of personal security on the railways, Passenger Focus 2009
[4] Passenger perceptions of personal security on Great Britain's Railways, 2006
[4] Railways for All : The Accessibility Strategy for Great Britain's Railways, 2006
[5] 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 deploying 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.

## 6.2 Disabled Persons Rail Card (DPRC)

The Disabled Person's Railcard (DPRC) is a much valued incentive to enable and encourage disabled people to travel by train.

Currently 142,000 people hold a DPRC. Passengers may qualify for a Railcard if they meet one of a number of eligibility criteria, for example that they are receiving disability-related benefits.

Not all disabled people (as defined by the Equalities Act 2010) will be eligible for a DPRC. Those outside the scheme include: temporary residents; visitors; people with temporary impairments/injuries etc.; and people not claiming relevant benefits (although people not in receipt of benefits are able to produce alternative evidence of entitlement, this is not widely known).

DPRC holders, and a companion, are entitled to a discount of 1/3 on most fares across the network. However discounted season tickets are not available.

4 million journeys are made by DPRC holders each year (an average of 28 journeys for each cardholder). The card is clearly highly valued by those who make use of it.

Figure 27: DPRC leaflet

Trips and travel patterns by DPRC holders are broadly similar to the population as a whole. DPRC is predominantly a leisure product so there are fewer commuter trips made even though, unlike other Railcards there are no restrictions on use before 09.30.

There is a correlation between disability and income, with disabled adults almost twice as likely to be living in low-income households as non-disabled adults[6].

It is not currently possible for disabled people in receipt of the DPRC to obtain discounted Season Tickets. Given the link between disability and poverty, and the need for disabled people of working age to travel at peak as well as off peak times, it might be useful to review this policy.

The Government has stated its intention to encourage more disabled people into work. Providing discounted season tickets would help support this.

## 6.3 Passenger Assistance

All TOCs provide assistance to older and disabled passengers. This is not only good customer service, but is necessary to meet a range of contractual and legal requirements.

The terms on which assistance is provided are set out in the DPPP of each train and station operator. Each DPPP must meet the DPPP Guidance issued by the Department for Transport, in order to be approved. Thereafter, compliance with the DPPP is a Licence (and where relevant Franchise) obligation for train and station operators. Since October 2013, ORR has been responsible for approving and monitoring DPPPs.

A national assistance booking system, 'Passenger Assist' is used by all train operators and can process bookings throughout the network. Almost all operators request 24 hours' notice for bookings, although London Overground advertises a "Turn Up and Go" assistance service, and Merseyrail requests one hour's notice. Others may be adopting similar polices.

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[6] http://www.jrf.org.uk/publications/monitoring-poverty-and-social-exclusion-2014

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.



Figure 28: poster advertising Passenger Assist service at Darlington

There is a variation in the level of service promised by different train and station operators in their DPPPs, 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[7]. For example, only 79% of surveyed passengers who had booked

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[7] Passenger Assist, Passenger Focus, March 2014

assistance received help alighting from their train. 75% of passengers were satisfied with the assistance provided overall.

When assistance does not arrive to help a passenger off the train, it is essential that a clear, reliable and readily available system is in place to enable the passenger to call for help. A phone number (widely publicised as part of the Passenger Assist system and staffed at all times) should be available. This is particularly important for those passengers without access to social media (see Chapter 7).

ATOC is currently conducting two pieces of research into passenger assistance. The first is a two year longitudinal study into experiences of using Passenger Assist. The second is looking at the London "Turn Up and Go" (L-TUG) project. A 12 month live trial started at Easter 2015. There are currently 37 stations offering "Turn Up and Go" as part of this pilot. There has been considerable interest to see if the L-TUG trial could be extended to other transport corridors e.g. Manchester - Leeds. There is believed to be a variation in the success rate of booked assistance delivery between TOCs, although it has not been possible to quantify this.

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 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[8], 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.

## 6.4 Mobility Scooters

The use of mobility scooters by older and disabled people is growing fast. A recent report by the Research Institute for Consumer Affairs (RICA) for the Department for Transport[9] suggest an annual growth of between 5% and 10%

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[8] Disabled Rail Passengers Awareness of Assistance from Train Operators, ORR, March 2014

[9]
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362989/Rica_Mobility_scooter_market_study_final.pdf

with annual sales for the UK of around 80,000 and total numbers in use in the order of 300,000 to 350,000. For many people mobility scooters provide freedom of movement and mobility in and around their local area. However, more and more people also want to travel with their scooter to enjoy the same freedom at their destination.

The increasing size of some mobility scooters (linked in part to obesity trends) is creating a major problem. Some are simply too big or too heavy to be accepted onto trains (or indeed other forms of public transport). It is also important to note that there is no definition of or standard for a scooter in terms of train and other transport vehicle design. Trains and buses are designed around a conceptual reference wheelchair defined in regulation. There is no equivalent for a reference scooter.

Unfortunately the range of different policies adopted by TOCs on the acceptability of mobility scooters is causing uncertainty and anxiety. Some set clear standards on their websites specifying the maximum dimensions they will permit on-board but there is inconsistency between them (due in part at least to different space availability on different types of train).

A 2013 report from the Research Institute for Consumer Affairs (RICA)[10] sets out the policies for each TOC. Although National Rail Enquiries includes a summary of the policies of each of the TOCs on the dimensions they will accept, it remains a logistical nightmare for anyone planning a journey that involves more than one TOC.

Transport for London now offer a service to assess individual wheelchairs or scooters and to provide evidence for those whose vehicles meet their requirements to demonstrate that they are allowed to board.

While this is a useful and welcome development, there is still an urgent need at national level for some means of identifying at the point of choosing or buying a mobility scooter whether it is likely to be compatible with public transport use. This same point was identified by the Transport Select Committee in its 2013 Report into Transport Accessibility. This could be a valuable initiative for ATOC to lead.

### 6.5 Toilets

The importance to a large and growing part of the travelling public to have available and accessible toilets on the station – without the need to call for assistance – should be recognised more fully by TOCs. For many older people and people with disabilities, access to a toilet is of great importance.

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[10] http://www.rica.org.uk/sites/default/files/documents/pdfs/mobility/mobility-scooters-and-trains.pdf

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

A 2007 report from (then) Help the Aged[11] on incontinence and older people established a link between worries about need to be within easy reach of a toilet and social isolation. Many of those interviewed for the study said that they did not use public transport for fear of not being able to reach a useable toilet quickly enough. The report called for the provision of *"adequate, accessible, well-maintained and equipped toilets...... at all bus, coach and railway stations and facilities on coaches and trains"*.

There is also an established correlation between age and bladder control with older people more likely to need frequent toilet access. Chart 3 below, taken from a Report "The Aging Bladder"[12] clearly shows the pattern.

Chart 3: Bladder compliance over time
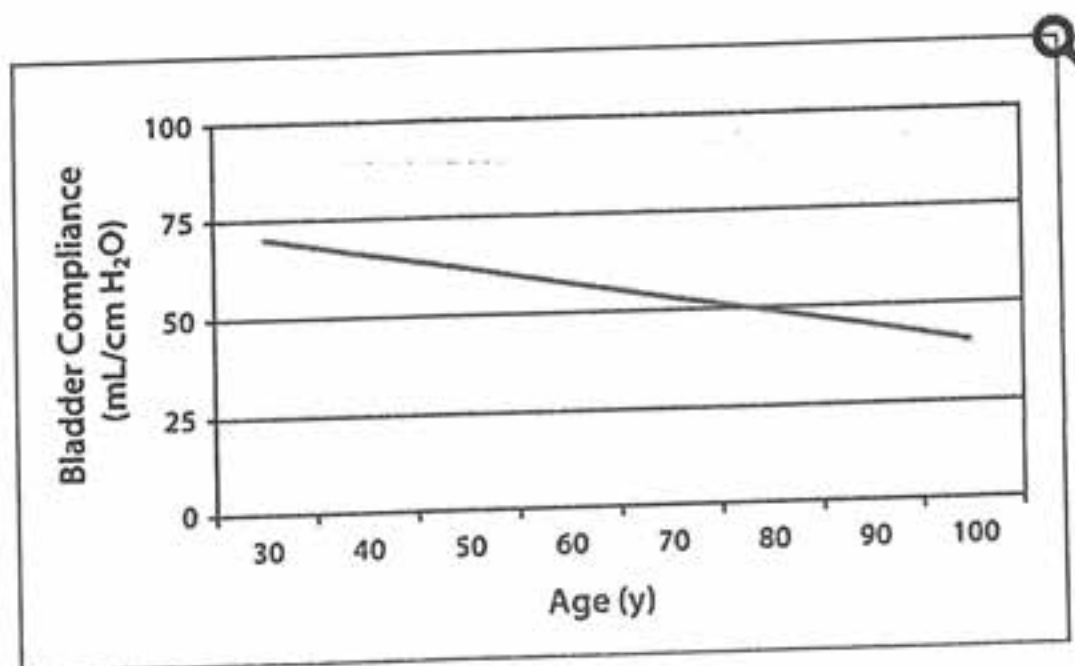


Lack of available – or accessible - toilets is therefore a major deterrent to travel for many older and disabled people. On stations, although toilets are sometimes provided, accessible toilets are normally kept locked with access provided by means of a staff controlled lock – often kept in an office some distance away and, of course, dependent on the availability of staff. A further complication is that toilets are often located in ticket office areas that will be locked when stations are unstaffed.

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[11] http://www.ageuk.org.uk/documents/en-gb/for-professionals/research/incontinence%20and%20older%20people%20(2007)_pro.pdf?dtrk=true
[12] http://www.ncbi.nlm.nih.gov/pmc/articles/PMC1472849/

Figure 29: There is an accessible toilet at Emsworth, but advertised opening hours are limited

Of the 40 stations surveyed for this Report, 38% had a toilet and 35% had an accessible toilet but at only 53% of these were the toilets open at all times trains were running.

On train toilets are also an issue. Keeping the Universal Accessible Toilet (UAT) in operation should be seen as a priority by fleet maintenance staff as this will enable passengers to travel with a greater degree of confidence. For a disabled passenger on a long journey to find the accessible toilet locked and out of order is a major concern.

Overall 85% of trains currently have a toilet. All of what might be termed 'Intercity' and 'Regional Express' trains, and 95% of 'Regional Local' trains have a toilet, but only 40% of 'inner suburban' trains do. Only 50% of trains currently have an accessible toilet but this will be addressed as the 2020 deadline approaches.

The need for toilets on shorter route services is also a priority for many older people. It is interesting to note a recent report (in the December 2014 edition of Modern Railways) that Dutch Railways (NS) is to respond to widespread public and parliamentary criticism by fitting accessible toilets to all 131 of their relatively new Sprinter Light Train EMUs (electrical multiple units). These trains currently have no toilets on board.

Where no toilets are provided on board services consideration needs to be given to better toilet provision at stations. So, for example, stations on the new

Crossrail route should have better toilet provision to compensate for the absence of on-board toilet facilities. Needless to say such facilities will also need to be accessible for disabled passengers.

### 6.6 Station Design

The design and layout of stations can make an enormous difference to the ease and confidence with which they can be used by older and disabled travellers.

Applying Inclusive Design principles is the best way to ensure that all travellers find it easier to move through a station or interchange with confidence. The basis of Inclusive Design is that facilities, equipment - and indeed building layout - are simple and intuitive, provide space for everyone and require low physical effort. This is much more effective – and cost effective – than providing separate, specialist facilities for disabled people. The example of the Barcelona Metro ticket machine quoted in Chapter 2.2 illustrates the concept clearly.

The key document which sets the standards to be followed is the DfT Code of Practice – which draws directly on the PRM-TSI.



Department for Transport

TRANSPORT SCOTLAND

Design Standards for Accessible Railway Stations

Version 04 – Valid from 20 March 2015

A joint Code of Practice by the Department for Transport and Transport Scotland

March 2015

*Figure 30: TOCs and Network Rail are obliged via their DPPPs to adhere to the design standards in the DfT Code of Practice when undertaking works*

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

In parallel, Network Rail, which owns and manages the country's largest stations[13], has adopted the principle of Inclusive Design and is developing an Inclusive Design Strategy. Once this is agreed it could form a useful basis for standards across the network.

The focus of the new strategy is on how to design and manage space effectively to create environments in which everyone can move about with minimal effort and maximum confidence. The strategy will be underpinned with training of Network Rail engineers so that there is clear and common understanding of the Inclusive Design concept. The use of Diversity Impact Assessments is also helping to ensure understanding and continuity of application.

One of the most important design features is an uncluttered layout that makes it immediately apparent which way to go to find key facilities such as ticket offices or machines, access to platforms, toilets etc. This can be achieved by a combination of sensitive layout and good signage.

Signage is particularly important in giving people confidence and minimising risk of missing trains and connections. Some degree of vision loss is common among older people and so it is vital that signs are well sited, clear and use colour contrast to ensure legibility. The PRM-TSI specifies white lettering on dark blue or black for this purpose. Consistent clarity will also help the large number of travellers who are unfamiliar with the station.

The location of signs is another critical issue. They are too often located in places that cause confusion at best and create a safety hazard at worst. One example is placing directional signs at the top of escalators. This causes people to be distracted at the moment they need to concentrate on stepping off the escalator. For some older people this is likely to result in a trip or fall. Placing signage where people can see it at a point from which they can make an informed decision about which way to go is both safer and more reassuring.

Walking distances are already a major barrier to access at stations. For example, at Manchester Piccadilly station, some interchanging passengers have to walk 600m. At Farringdon station in London, 450m is possible when interchanging with the Underground. With longer platforms, walking distances can increase, which may impact on many older and disabled people.

Loss of stamina among older people is also a key factor. Many modern transport facilities – both stations and to an even greater extent airports – involve long walking distances. It is very important to indicate the maximum distance that might have to be walked to get from point of arrival to platform and to ensure that there are seats to provide resting places available on the route. Network Rail is considering the introduction of seats every 50 metres (maximum) at their stations for this purpose.

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[13] Birmingham New Street, Bristol Temple Meads, Edinburgh Waverley, Glasgow Central, Leeds, Liverpool Lime Street, Manchester Piccadilly, Reading, Cannon Street, Charing Cross, Euston, Kings Cross, London Bridge, Liverpool Street, Paddington, St Pancras International, Victoria, Waterloo.

Toilets become increasingly important as you grow older (see also 6.5). Plentiful provision and clear directional signage to toilets is essential.

Good design standards and regular monitoring and maintenance of all access features is also 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

Interchange between one mode and another (for example rail and bus) is often a neglected and therefore worrying area for older people. Key factors such as clear directional signing and consistent good levels of lighting are among the key features. Here again the application of Inclusive Design principles is the most effective route to take.

In addition to developing a new Inclusive Design Strategy, Network Rail has also set up a Built Environment Accessibility Panel[14] which brings together experts both in disability and in access to review and challenge some of the traditional practices adopted by Network Rail.

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.

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[14] https://www.networkrail.co.uk/community/interest-groups/network-rail-built-environment-accessibility-panel/

## 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.



Figure 31: Access subway to Retford station – an environment likely to make many people feel unsafe

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"[15] 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 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.

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[15] http://www.passengerfocus.org.uk/research/publications/nrps-and-bps-accessibility-analysis-2013

## 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.

The problems at Kings Cross over the 2014 Christmas period caused by late running engineering works, threw up some key points. Large numbers of passengers were disrupted including – inevitably - many older passengers and those with disabilities as well as parents travelling with small children. And yet, all passengers were directed to Finsbury Park which does not have step-free access to the Underground nor to the street from most platforms.
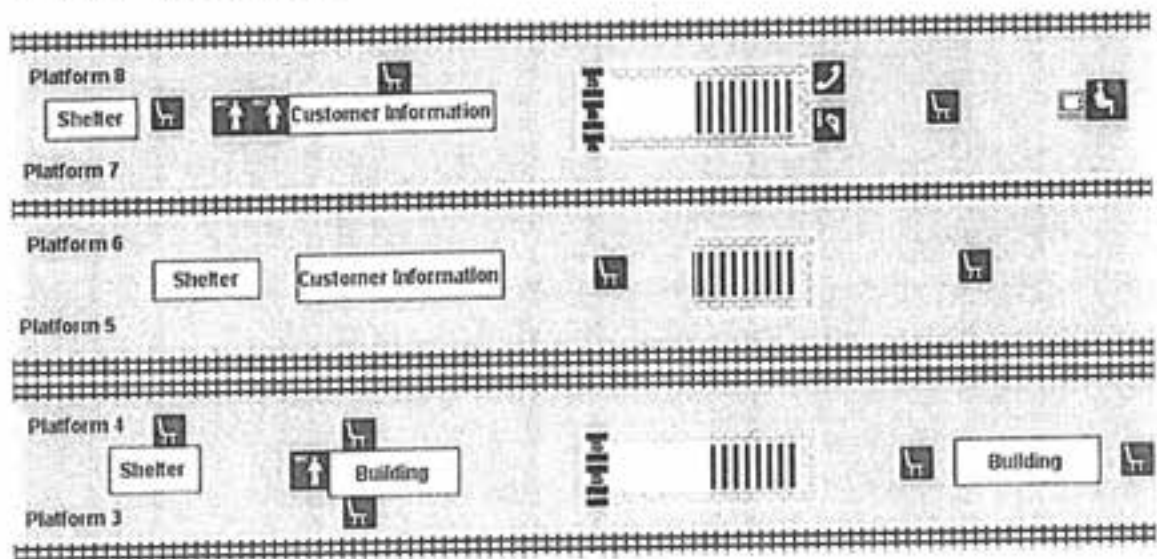


Figure 32: Stations Made Easy shows no step-free access to Platforms 3-8 at Finsbury Park station, but people needing this were still directed there

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 list of 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

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.



Figure 33: East Midlands Trains, advert in DPPP - many TOCs now advertise that their cheapest deals are only available online

Chart 4 below, taken from data produced in 2013 by the Office for National Statistics[1], 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.

### Chart 4: Use of Internet Services by Age



Use of internet services related to travel or travel accomodation
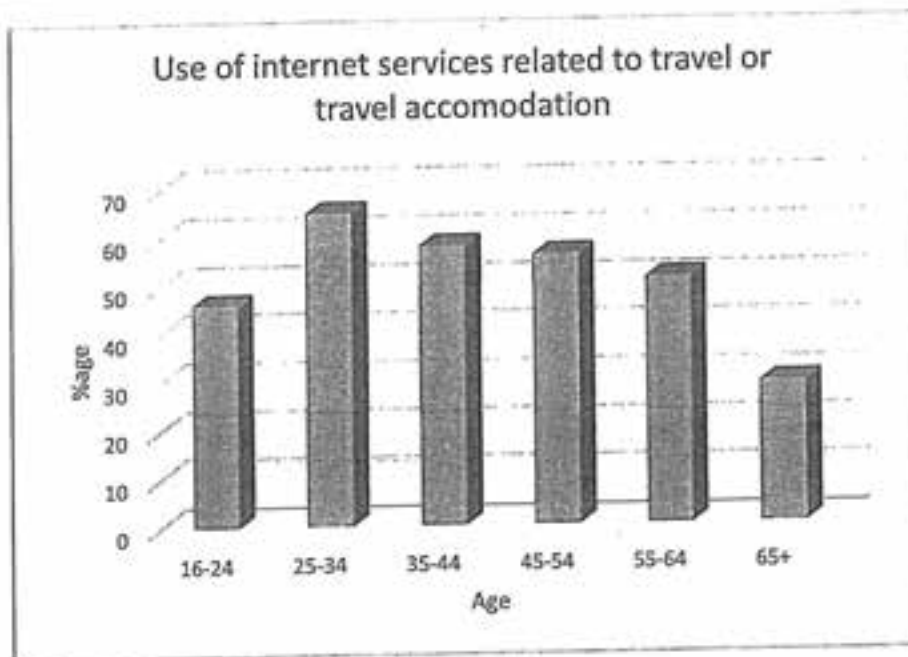
Similarly, OFCOM's report "The Consumer Experience of 2013"[2] states that take-up of smartphones with web access has continued to increase rapidly over the past year, with over half of all adults now claiming to own one (56%). However take-up varies significantly by age; just over four-fifths of those surveyed by OFCOM (82%) aged 16-24 reported having a smartphone, compared with 17% of those aged 65-74 and only 4% of those aged 75 and above.

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. As more of the population have moved to consuming information electronically the amount of printed information produced by Operators has fallen. However TOCs need to have clear strategies for ensuring that printed materials get to the people that need them most. Leaflets sitting in racks at stations seem to be a particularly ineffective way of reaching

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[1] Internet Access: Households and Individual, ONS 2013
[2] http://stakeholders.ofcom.org.uk/binaries/research/consumer-experience/tce-13/TCE_Research_final.pdf

passengers who may not currently be using rail services. Many of these issues are equally relevant for people with learning disabilities or low vision for whom complex internet based information is out of reach.

Nor is reliance on old fashioned printed timetables a good enough alternative. Engaging older people in discussing how they would like information to be presented (in terms of format, font size and content) and asking where they would find it most helpful to receive information (local shops, post offices, etc.) is likely to produce much better results.
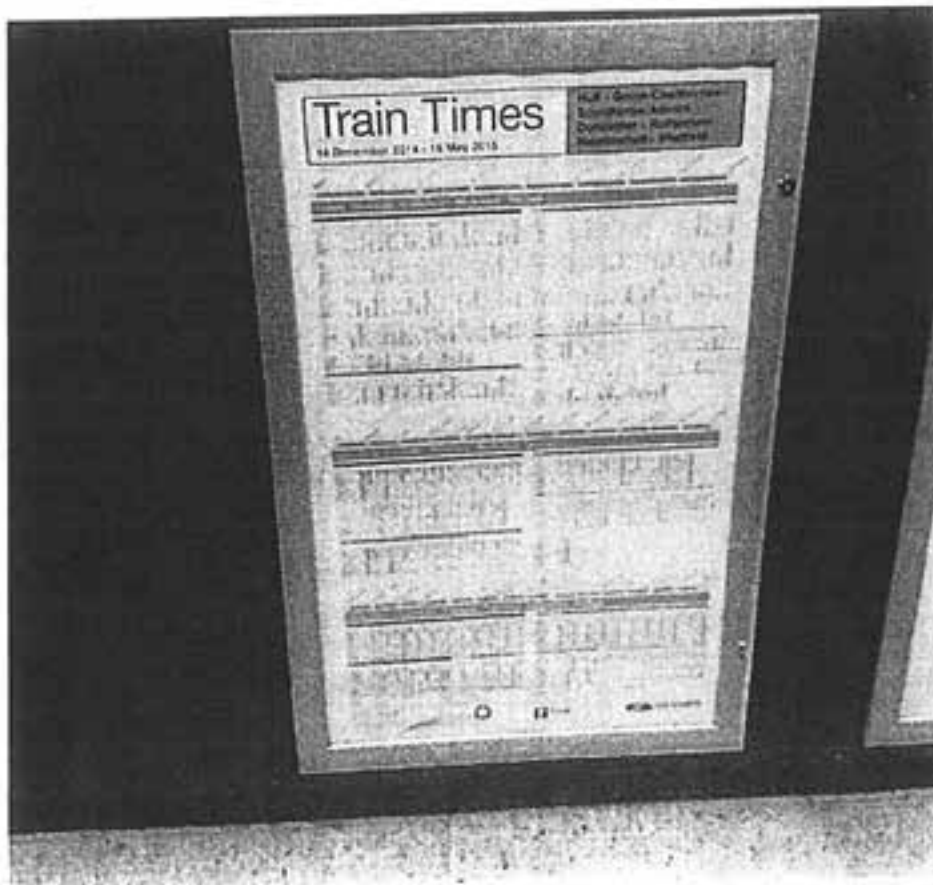


*Figure 34: This timetable poster at Doncaster is located on a platform (only a few cm from the floor, and the text size is tiny) where it is unlikely to be of use*

The 2013 Transport Focus survey of disabled passengers asked respondents what improvements would help them when planning future journeys. The two areas in which importance given by disabled people was much higher than passengers in general were:

- Better information facilities at stations
- Make timetables easier to read.

For disabled people who do have internet access it is vital that train company websites comply with accessibility standards (as required by the Equality Act

2010) so they are available for blind people using screen readers and others who need to modify text in order to use the site. Good examples of web based information include ATOC's "Disability onboard" website[3] which provides reassurance and basic information for disabled people uncertain if train travel will work for them and the Stations Made Easy website[4] which includes information on which stations have step free access (although keeping this information up to date remains a challenge).

## 7.2 Social Media

The use of social media to communicate information about travel disruptions and generally keep travellers up to date is increasing rapidly and train operators are among the many service providers making use of them.

At least one train company, for example, uses its on-board Passenger Information System to invite passengers to follow the company on Facebook or Twitter. No alternative means of communication, such as a phone number for information, is provided.

There is a need for caution to ensure that older people, in particular, are not left behind or excluded as more and more information is disseminated by TOCs and others only using social media sites.

It should be noted, however, that many younger disabled people do use social media for information and communication. There is anecdotal evidence of the value from wheelchair users who rely on Twitter to get help when assistance to get them off a train fails to arrive. In this context there was an observation that Twitter feeds need to be monitored round the clock. There was praise for Virgin which provides 24/7 coverage and criticism of Network Rail which does not.

## 7.3 On-line retail

However much older people may fear the use of on-line retail there will inevitably be an increase in it. In some areas choice is being withdrawn so that internet access is the only means.

Older people are often unsure about on-line purchase itself and many believe it is a route to having their security breached in terms of Bank Details and Credit Cards.

As shown in Chart 4 in Chapter 7.1, internet use among the current generation of older people is still low.

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[3] http://www.disability-onboard.co.uk/
[4] http://www.nationalrail.co.uk/stations_destinations/disabled_passengers.aspx#SME

This means that for many years to come, a significant number of older and disabled people (particularly those with learning or other cognitive impairments) will be deterred from travelling by train and will prefer to use modes of travel that do not require internet use.

Additionally the process itself should be made easier and a backup telephone link in the event of failure to achieve an on-line transaction must be provided. The price incentive of on-line arrangements will not in itself be sufficient to overcome the fears and mistrust that presently exist.

Older people will increasingly become aware they are paying more for travel because all the deals and incentives are on-line. It is imperative that user-friendly alternatives to internet domination remain available.

Although it is suggested that the next generation of older people will be more receptive to on-line retail generally, this is by no means a foregone conclusion. Although they are likely to be more internet savvy than older people are currently, they will still, in older age, seek simpler solutions that do not require such high visual acuity or fine finger movements, for example.

To cater for the online needs of older people it is essential that designers consider the statement that the bigger the step forward in technology by the innovators the bigger the gulf between them and the users.

## 7.4 Ticket Vending Machines

With the large and growing number of stations unstaffed for all or part of the day, people are increasingly reliant on the use of ticket vending machines at stations, either to collect tickets purchased on-line or to buy tickets.

However, both the location and design of the current generation of ticket machines makes them difficult – and in many cases impossible – for disabled and older people to use.

At smaller stations the machines are often placed outside the station in locations that are cold and draughty in winter and subject to bright sunlight making the screen unreadable at other times.

*Figure 35: This Ticket Machine positioned outside at Meadowhall has a touch-screen which is subject to glare in sunlight*

The machines operate on a touch screen system which is unworkable for many people with low vision. There are no audible instructions to guide users and the array of choices of ticket types is daunting, particularly for anyone with any kind of cognitive impairment.

There is some recognition that current ticket machine design is causing problems but instead of rethinking the design to be more easily useable, a current trial project (for example in Sherborne, Dorset) has incorporated a means to call for assistance (remotely) to talk the passenger through which button to press.

It is highly unlikely that the current trend will be reversed. It is therefore vital that greater thought is given to where ticket machines are located in terms of shelter and lighting. It is also vital that technology available elsewhere is used to ensure that the machines are also useable by people who cannot see a touch screen and do not have fine manual dexterity.
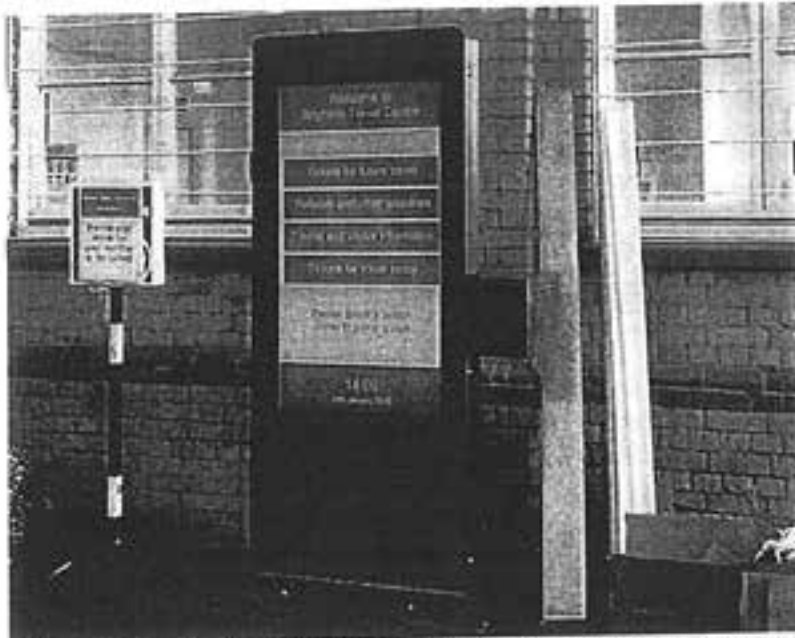
*Figure 36: Touch-screen machines are unusable by many disabled people. Here at Brighton even the Ticket Office has one – as part of a queuing system*

This is an essential corollary to the recent Government ruling that ticket machines must be programmed to offer the cheapest available tickets, not least given the growing number of ticket offices unavailable at times when people would want advice on the right ticket purchase.

There are, however, some trends which will reduce the need to pre-purchase tickets. The introduction of Freedom passes in Greater London and SMART Ticketing mean that passengers are increasingly moving away from traditional ticket formats. In London, for example, contactless bank cards can now be used on almost all trains.

# 8. External Factors

This Chapter explores a range of external factors, some outside the control of the rail industry, which may have an impact on the rate and pace of change towards accessibility.

## 8.1 Franchise Policy

### 8.1.1 A long term and mainstream approach

The Department for Transport is taking an increasingly long term and analytical approach to the franchise process. They are currently focussing on the key issues and changes that will shape the railways between now and 2035. Among the considerations are the demographic trends and what they mean for passenger profiles now and in the future and areas such as the changing modal share of the railways and developments in technology.

Rather than focussing on accessibility in the narrow sense set down in legislation, DfT are thinking in terms of a more inclusive railway that brings benefits for passengers across the board. One obvious example is the benefit of lifts and ramps for people travelling with small children, baby buggies and luggage as well as for wheelchair users.

They are also keen to make accessibility part of the core mainstream business rather than a separate niche subject. This seems in principle to be a desirable and sensible ambition provided that it does not get lost in the bigger business picture and gradually forgotten over time. It will be important to ensure that both the legal and good practice requirements of accessibility remain high on the agenda.

A DfT document to be published shortly on rolling stock will set out the Government's expectations of what future rolling stock will provide. This will include a focus on the passenger environment and – within that – accessibility requirements. There is a vision of more flexible rolling stock that can be re-configured between peak and off-peak requirements.

There is also a move to encourage station operators to think about broadening their use within communities to increase footfall and make them less likely to be unstaffed or unattended.

### 8.1.2 Staffing

DfT are clear that they are not explicitly promoting a reduction in staffing levels on trains or at stations but they are of the view that passenger practices – for example in ticket purchase – are changing and that a change in practices must follow. They are interested in the Transport for London (TfL) move to bring staff

out of ticket offices so that they are more visible and available on the concourses and platforms where people need them. Provided that this is sensitively handled there can be significant benefits for older and disabled passengers.

### 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 that 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.

### 8.1.5 Funding

Available funding pots such as Minor Works, Small Schemes and Access for All will also be under review to ensure that they are being used in the most effective way. Again, the focus in future is likely to move towards outcomes rather than more specific requirements. Provided that there is no loss of funding availability, there may be benefit in a more flexible approach that allow tailored access solutions at individual locations.

## 8.2 Franchise devolution

### 8.2.1 Responsibility for cross border franchising

Responsibility for franchising has already been devolved to the Scottish

Parliament. The new ScotRail 10 year franchise was awarded to Abellio in October 2014 and began operation on 1st April 2015. The Caledonian Sleeper franchise was awarded to Serco. That will run for a period of 15 years from 1st April 2015.

Further devolution (as recommended by the Smith Commission) has been set out in the January 2015 Command Paper[1] "Scotland in the United Kingdom: An Enduring Settlement " and will include the power to allow public sector operators to bid for rail franchises funded and specified by Scottish Ministers. In practice, since the current franchises are newly let, this new power is unlikely to be used for some years, unless either current franchise is terminated early. Nonetheless, it does, in the longer term raise the prospect of significantly different regimes operating North and South of the border.

For Wales, the White Paper "Powers for a Purpose: Towards a Lasting Devolution Settlement for Wales[2]," which draws on the recommendations of the Silk Commission, was published in February 2015. The Silk Commission recommended that Welsh Ministers should become the franchising authority for Wales and the Borders rail franchise. This recommendation is already being implemented.

This means that the Welsh Government will have full responsibility for specifying and procuring a rail franchise to deliver services after the existing Wales and Borders franchise expires in 2018. There is clear recognition of the need to safeguard the interests of rail passengers on cross border routes but no decisions have yet been made about how this will be organised, other than to suggest that services that are in addition serving English markets are likely to remain under the control of the Secretary of State for Transport.

For disabled and older people, there is a huge advantage in being able to travel long distances without the need to change trains. The decision to devolve franchising to the Scottish Parliament and the Welsh Assembly potentially risks losing some of these benefits.

There are many cross border services. For Scotland, both the East and West coast routes Virgin will run into Glasgow, Edinburgh and Aberdeen. The Trans Pennine service from Manchester will also continue to run cross-border. Although there is unlikely to be any change in the next few years, it will be important to keep in mind the significant benefits to older and disabled passengers of continuity and ease of travel.

Similarly for Wales, there are currently good examples of long distance journeys that do not involve transfer. These include Manchester to Milford Haven via

Crewe, Shrewsbury, Hereford, Newport, Cardiff and Carmarthen. Or Aberystwyth to Birmingham International Airport via Shrewsbury and Wolverhampton.

Arriva Trains Wales services cross the boundaries into England. Likewise First Groups services to South Wales from London and Virgin Trains services to Holyhead also cross those borders.

There are also many self-contained services within Wales. The valley lines for one, are totally within Wales. Welsh responsibility for the renegotiation of the Franchise presently held by Arriva Trains Wales will need managing carefully. The vehicles presently operating the services are non-compliant, mostly 150x and Pacers.

The electrification London to Wales which includes the Valley lines is scheduled for completion in 2019. That would allow a cascade of Compliant Rolling Stock onto the Valley Lines. However, if that work is not completed by the 2020 deadline some 200 vehicles will be operating which are not compliant.

The Intercity type services to Cardiff, Holyhead, Glasgow and Edinburgh are operated now and will be in the future by compliant vehicles.

From an accessibility perspective, the greatest concern is that these cross border arrangements may increase the likelihood that journeys are broken and there is a need to change trains. For older and disabled people this can be both physically demanding and a cause of stress and anxiety.

## 8.2.2 Devolving Access for All Funding

For the new round of Access for All funding (extended to 2019) , there has been no separate arrangement for Scotland as they now have their own £30 million stations improvement fund which is not available for England or Wales.

Small Schemes funding is already devolved to Scotland through a grant allocation which is distributed by Transport Scotland.

In Wales, the allocation of the new round of funding is handled as it is for the regions. The Local Delivery Group (comprising Network Rail and the TOC) nominated stations and ranked them against the established criteria (including footfall and levels of disability). Around one third of the funding available has been allocated to Wales to ensure a fair geographical spread. In addition, the Wales Assembly Government are adding matching funding to strengthen the business case for some stations.

For the annual Small Schemes funding, Arriva trains Wales gets a cut of the £7.5 million available to spend on access improvements at their stations – based on numbers of stations and their footfall.

It will be important to ensure that access standards and compatibility are maintained so that seamless journeys can be made with confidence.

## 8.3 Electrification

The electrification of the Midland Main line from Bedford to Nottingham, Derby and Sheffield and the Great Western Route to Swansea will mean a new fleet of trains for both routes. In addition an in-fill electrification in the North West and into North Yorkshire will also bring cascaded units released from other areas.

All these initiatives will cause a number of compliant Diesel Units to be available for reallocation and again there is evidence that this is being managed effectively.

The effect of 1,140 extra units introduced into Thames Link Great Northern (TLGN) will have a similar cascading effect, freeing up rolling stock to move elsewhere in the system. The same situation will arise when the East Coast main line is re-franchised.



Figure 37: This ex-Thameslink Class 319 train is being refurbished for use on newly-electrified routes in the North of England (source Northern website)

In spite of these uncertainties, there can be a reasonable degree of confidence that, provided there continues to be sensible overall stewardship of the existing fleet, the target of total compliance by 2020 should be largely (but not totally) achieved.

## 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 in a case in point.

## 8.7 Other Industry initiatives

The rail industry is in a period of significant change, and the following key initiatives/ external events are likely to have an impact on accessibility:

### 8.7.1 Station improvements

A number of initiatives will result in improvements to facilities, accessibility and capacity at stations. These include: National Stations Improvement Programme (NSIP); Access for All (discussed in Chapter 5.1); Station Capacity Enhancements; and commercial developments.

Capacity enhancements may benefit older and disabled passengers by reducing crowding, and may also reduce walking distances. Where additional facilities are provided, these will often provide enhanced accessibility. Major improvements can be associated with commercial developments.

The industry has an excellent safety record when compared with railways across Europe, and continues to explore ways of reducing risk. A key target is the number of 'trips and slips' at stations. This has caused Network Rail and the TOCs to focus on improvements to staircase quality. It is likely by 2020 further improvements in this area will have been made.

Improving staircase quality will often improve accessibility as well as safety, through the provision of features such as visually-contrasting step-edges, non-slip surfaces, handrails and tactile markings. At surveyed stations, 72% have visual contrasting on all stairs, 64% have handrails on both sides of all stairs and ramps, and 37% have tactile warning strips at the top and bottom of all stairs. It has not been possible to estimate the network percentage figures in 2020, but future improvement is highly likely.
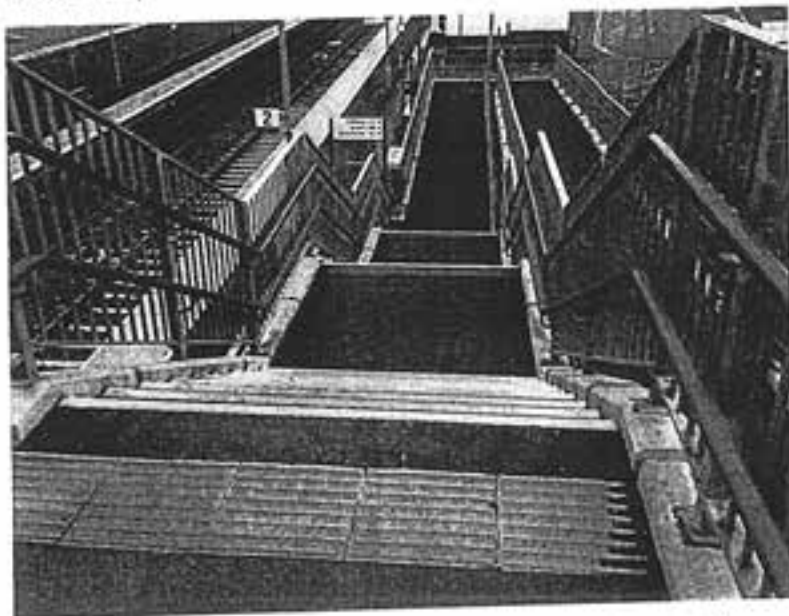


Figure 38: This staircase at Laurencekirk has tactile warning strips, visually-contrasting stair nosings, and dual height handrails on both sides

### 8.7.2 PRM-TSI/ Code of Practice compliance

Network Rail will be carrying out major work across the network on a range of projects, for example Route Clearance work to permit electrification. Where this occurs, opportunities exist to achieve compliance with the PRM-TSI/ Code of Practice at little marginal cost, and this could bring significant accessibility improvements.

Achieving compliance with the PRM-TSI when undertaking works will benefit many passengers, potentially to an even greater extent than dedicated projects to improve accessibility.

# 9. Summary of recommendations

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 discussions 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 pro-active 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 1st 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.

### 4. Devolution

Where rail franchises are devolved, arrangements must be put in place to ensure that cross-border services are not disrupted as a result. The need to break a journey and change trains is a major disincentive and worry to many older and disabled people.

Similarly, where Access for All funding is devolved, arrangements must be in place to ensure that standards are consistent and compatible. Otherwise disabled and older people will be unable to travel with confidence that their needs will be met.

## Health & Safety

### 5. 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 need to be clear consistent standards and guidance applicable across the network and presented in a consistent format.

## Information & Ticketing

### 7. Timetable and access information

Talk to older people about how they would like information to be presented (in terms of format, font size and content) and ask where they would find it most helpful to receive information (local shops, post offices, etc.). This is likely to produce much better results.

Consider introducing a single phone line for information on accessibility (if possible giving real time information). This could be linked to the National Rail Enquiries phone number or provided separately.

The Journey Planner should include a "step free" tick box (as Transport for London's Journey Planner does). Printed posters at stations could also incorporate step free information (on a network-wide basis). Step free information should also be provided on local area rail maps as displayed at stations.

### 8. Internet dependence

Review the user friendliness of internet transactions and ensure that there is a backup telephone link in the event of failure to achieve an on-line transaction.

Older people will increasingly become aware they are paying more for travel because all the deals and incentives are on-line. It is imperative that user-friendly alternatives to internet domination remain available.

### 9. Ticket Vending Machines

Give greater thought to where ticket machines are located in terms of shelter and lighting. Ensure that technology available elsewhere is used to ensure that the machines are also useable by people who cannot see a touch screen and do not have fine manual dexterity.

## 10. DPRC and Discounted Season Tickets

Consider the option of enabling disabled people holding a DPRC to obtain discounted Season Tickets.

## 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 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 DPPPS

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 that the DPPP is of real value to disabled and older passengers. The ORR open letter to TOCs dated 18th December 2014[1] 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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[1] http://orr.gov.uk/__data/assets/pdf_file/0006/16377/dppp-compliance-and-approval-process.pdf

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

## Rolling Stock

### 17. On-Train toilets

Review the need for accessible toilets even on shorter distance routes given the changing demographics and the importance of toilet access and availability.

## Stations

### 18. Step Free Stations

DfT should devise and publish a quantitative methodology for the evolution of potential accessibility improvements, including Access for All schemes, to provide step-free access to stations. This recommendation is consistent with the observations and recommendations made by the Transport Select Committee in 2013[2].

It is worth considering whether greater benefits can be obtained by raising the maximum number of stations to at least Category B (taking account of passenger numbers) rather that insisting that a smaller number of schemes achieve Category A status. The relative benefits of improving less busy stations from B to A may often be low.

### 19. Availability of Lifts

In some cases, lifts provided under the Access for All fund are not available when the station is unstaffed but when trains are running. As all Access for All lifts are capable of remote operation, lift operating hours should be extended to cover all times trains are running.

Availability of lifts for passenger use – whether assisted or remote – should be a condition of Access for All funding.

### 20. Station toilets

In the light of demographics and the established link between availability of toilets and the willingness of older people to travel, ensure that station toilets are available and accessible at all times that trains are running.

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[2] http://www.publications.parliament.uk/pa/cm201314/cmselect/cmtran/116/116.pdf

## 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.

## The Legal Framework

There have been moves to improve the accessibility of rolling stock and stations on a voluntary basis since the 1970s. However, the first legal obligation to deliver accessibility came in the Railways Act 1993[3] which included (Section 71(B)) a requirement that the Secretary of State should produce a code of practice *"protecting the interests of users of railway passenger services or station services who are disabled."*

### 1 Rolling Stock

The Disability Discrimination Act 1995[4] gave Government the power (Section 46) to make regulations to ensure that disabled people, (including those travelling in wheelchairs) can get on and off trains *"without unreasonable difficulty"* and can travel *"in reasonable comfort"*.

In addition the Act specified that Rail Vehicle Accessibility Regulations may, in particular, make provisions *"as to the construction, use and maintenance"* of regulated rail vehicles including the location and space given to wheelchair accommodation, toilet facilities and assistance given to disabled passengers. The Government used these powers to bring the Rail Vehicle Accessibility Regulations 1998 (RVAR) (S.I.1998/2456) into force on 1st November 1998. A small number of amendments were made to the RVAR by the Rail Vehicle Accessibility (Amendment) Regulations 2000 (S.I. 2000/3215).

The Regulations (as amended) applied to all rail vehicles coming into service after 31st December 1998.

At the time the Act was drafted it was recognised that there would be rolling stock already under construction but due for delivery after 31st December 1998 or for which the design was already well advanced before the final RVAR specifications were known. The Act (Section 47) provided for the Secretary of State to grant exemptions which would authorise the use of carriages that were not fully compliant with RVAR. The specifics of these exemptions were set out in the Rail Vehicle (Exemptions Applications) Regulations 1998 (S.I. 1998/2457)[5].

The Disability Discrimination Act 2005 brought in additional powers and required the Secretary of State to make Regulations to ensure that all rail vehicles met the RVAR requirements by 1st January 2020.

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[3] http://www.railwaysarchive.co.uk/documents/HMG_Act001.pdf

[4] http://www.legislation.gov.uk/ukpga/1995/50/contents

[5] http://uk.practicallaw.com/uklegislation/uksi/1998/2457/made#

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

On 1st July 2008, a new European standard came into force - the technical specification for interoperability for persons with reduced mobility (PRM-TSI)[6]. The PRM-TSI applies to all trains used on the interoperable rail system, which comprises the major lines of all Network Rail infrastructure. It sets standards for accessible trains, stations and other facilities. A revised and updated standard was adopted by the European Commission on 18th November 2014 and will apply to the whole European rail network from January 2015[7].

To avoid having two different sets of standards (European and UK), the Rail Vehicle Accessibility (Interoperable Rail System) Regulations 2008[8] removed those trains subject to the PRM-TSI from the scope of RVAR 1998 but ensured that there remained a requirement to maintain and operate them to the standards to which they were built, i.e. RVAR.

The deadline set for compliance with accessibility requirements of all rolling stock in service – 1st January 2020 - remains in force.

## 2 Stations

Access to stations is also covered by the Equality Act 2010 (previously the Disability Discrimination Act 1995). Station access is included in the general anti-discrimination requirements imposed on providers of services to the public. This requires that where there is a *"provision, criterion or practice"* that makes it impossible or unreasonably difficult for a disabled person to make use of that service it is the service provider's duty to take steps to change that provision.

Where access is denied because of a physical feature, the service provider is required to remove it, alter it so that it no longer inhibits access or provide a reasonable alternative means of making the service available to a disabled person. This part of the legislation also contains the concept of "reasonable adjustment" which would be taken into consideration in terms of the cost of removing a barrier to access relative to the value or viability of the whole enterprise.

It should also be noted that Equality Act provisions apply also to a wide range of services, policies and practices carried out by TOCs (for example, customer call centres and staff training).

The Government published a Code of Practice "Accessible Train Station Design for Disabled People"[9] to meet its obligation under the 1993 Act and to give clear guidance on access requirements at stations. This guidance, published in 2011, superseded guidance first produced in 2002 by the then Strategic Rail

[6] https://www.gov.uk/government/collections/background-to-rail-interoperability#technical-specifications-for-interoperability-tsis
[7] http://ec.europa.eu/transport/modes/rail/news/doc/tsi/regulation_en.pdf
[8] http://www.legislation.gov.uk/uksi/2008/1746/pdfs/uksi_20081746_en.pdf
[9] https://www.gov.uk/government/publications/accessible-train-and-station-design-for-disabled-people

Authority. The guidance applies to the whole rail network but for stations subject to the PRM-TSI (those on the Trans European Network (TEN)) the requirements are set out in the Technical Specification of Interoperability: Persons with Reduced Mobility (2008).[10]

The Government published a "Railways for All" Strategy in 2006.[11] As part of this Strategy, the Government launched the "Access for All" funding programme[12]. This is intended to provide an accessible route at more than 150 of the busiest inaccessible stations by 2015. The work is being carried out by Network Rail. The Fund was originally set up to run until 2015 but has since be extended to 2019 with an additional £100 million available.

In addition, every passenger train and station operator must have an operating licence, issued by the Office of Rail and Road. These licences include a condition that requires operators (including Network Rail for the stations it operates) to establish and comply with a Disabled People's Protection Policy. The Department for Transport may also include in Franchise Agreements, other contractual requirements relevant to accessibility – for example on station improvement works and staffing.

The Disabled People's Protection Policy outlines how the operator will protect the interests of disabled users of their trains and stations. The Department for Transport issued guidance in 2009: "How to Write Your Disabled People's Protection Policy: A Guide for Train and Station Operators"[13].

## 3 Rail Passenger Rights

Regulation No. 1371/2007 of the European Parliament and of the Council on Rail Passenger Rights and Obligations[14] became law in the UK on 4th December 2009. The Regulation is intended to strengthen the rights of rail passengers, including those with disabilities. Parallel regulations have been brought into effect covering air travel, maritime and bus and coach services.
The Regulation applies to international and most domestic services (with some exceptions for light rail and heritage services).

The Regulation requires both train and station operators to have rules in place to ensure that there is no discrimination against passengers with disabilities. In the UK this obligation is deemed to have been met through the production of a Disabled Persons' Protection Policy.

[10] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2
008:064:0072:0207: EN:PDF
[11] http://www.wecrail.com/railways-for-all-strategy.pdf
[12] https://www.gov.uk/government/collections/access-for-all-programme
[13] http://webarchive.nationalarchives.gov.uk/20120607140807/http://assets.dft.gov.uk/publications/how-to-write-your-disabled-people-s-protection-policy/peoplesproguide.pdf
[14] http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32007R1371&from=EN

There is a requirement that disabled people should not pay any more than other passengers for tickets or seat reservations and an obligation on train operators to provide information on the accessibility of their services including facilities on board.

The Regulation requires train operators and stations managers to ensure that "stations, platforms, rolling stock and other facilities" are accessible to disabled people through compliance with the PRM TSI.

There is a particular requirement that in the absence of staff on board a train or at a stations, operators must "make all reasonable efforts" to enable disabled people to travel.

There are requirements for assistance to be given, free of charge, both at the station and on board the train. To guarantee assistance, disabled people are required to give 48 hours' notice and Operators must respond either by agreement to deliver the assistance booked or a written explanation as to why the assistance requested cannot be provided.

However, even if no advance notice is given there is a requirement to make "all reasonable efforts" to enable the disabled person to travel provided they arrive at least 30 minutes before departure. Operators are required to designate points both inside and outside the station from which people can signal their need for assistance. Where these points should be located will depend on the size and layout of individual stations. It may include car park and drop off points as well as links with other transport modes.

The final requirement specific to disabled passengers concerns liability for the total or partial loss of or damage to mobility equipment (such as wheelchairs). Where the train operator is responsible for loss or damage, there is no financial limit set on the extent of their liability.

The Department for Transport published guidance on the Regulation in November 2011[15] and is currently (November 2014) consulting on the scope of the current exemptions[16].

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[15] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/2368/guidance-note.pdf

[16] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/363551/141014_Passengers_Rights_and_Obligation_Consultation.pdf

## Organisations Consulted

In preparing this Report, meetings were held with the following organisations (in addition to ATOC):

- Angel Trains
- Department for Transport Rail Executive  - Access for All Programme Sponsor
- Department for Transport Rail Executive -  Rolling Stock Technical and Accessibility
- Department for Transport Rail Executive – Franchise Policy Development
- Eversholt Rail Group
- Network Rail – Access & Inclusion Manager
- Office of Rail and Road
- Porterbrook Leasing Company Ltd
- Transport Focus

In addition, Network Rail and all the TOCs were approached to provide and verify information on accessibility of their services and facilities.

## Project Team

This report has been commissioned by ATOC and researched and compiled by:

### Ann Frye BA, FCILT, FCIHT, TPP

Ann Frye is an international specialist on the transport and mobility needs of disabled and older people. She advises governments, public, commercial and professional bodies on sustainable policy solutions to meet mobility needs in all transport modes, and in the pedestrian environment.

Ann has contributed to many Europe-wide projects including MEDIATE (Methodology for Describing Transport Accessibility in Europe) and AENEAS (Attaining Energy Efficient Mobility in an Ageing Society). She also chaired the COST 335 project on Access to Heavy Rail Services. She has recently contributed to a European Commission study on the socio-economic impacts of possible new measures to improve accessibility of goods and services for people with disabilities.

She has worked with the United Nations and the International Transport Forum on the mobility implications of a global ageing population. She has also advised governments and transport authorities in Canada, Hong Kong, Australia, New Zealand, the Republic of Ireland and Dubai.

Ann has worked in this field for over 30 years; until 2006 she headed the Mobility & Inclusion Unit in the UK Government Department for Transport where she delivered a major programme of research, legislation and policy to promote the mobility of disabled and older people in all areas of transport and in the pedestrian environment. Her work included responsibility for the drafting and implementation of the UK Rail Vehicle Accessibility Regulations (RVAR)

Ann is a Visiting Professor at University College London. She is also a Fellow of the Chartered Institute of Logistics and Transport and of the Chartered Institution of Highways and Transportation in the UK and an honorary Transport Planning Professional.

### Matthew Smith BSc, MA, MCILT

Matthew is a leading specialist in rail accessibility issues.

He is a former Train Operating Company Accessibility Manager and qualified Transport Planner. He formed Rail Accessibility Ltd in January 2010, to provide consultancy services regarding: train and station accessibility; policy; training; and compliance issues.

He has worked with train and tram operators, local authorities, RSSB, residents' associations and Network Rail to increase understanding of accessibility issues and develop solutions. He has been lead accessibility advisor on many rail franchise bids.

Across various projects, he has carried out hundreds of detailed station accessibility audits, giving him a thorough knowledge of the rail network, and the barriers to access faced by older and disabled passengers.

Matthew is a Member of the Chartered Institute of Logistics and Transport and sits on its Access and Inclusion Forum.

## Peter Rayner FCILT, FIRO. MCIM. assoc IRSE

Peter currently serves as Transport Adviser to the National Pensioners Convention (NPC) and to the Greater London Forum (GLF). He has been a member of AGE-Platform EU Expert Group on Universal Access and Independent Living since 2004 and has represented AGE -Platform as a speaker at conferences in Nuremberg, Stuttgart, Geneva, Barcelona, Prague and Brussels.

He is also AGE Platform's mandated representative on the TSI PRM (Technical Specification for Interoperability) (Persons of Reduced Mobility) working party in ERA HQ in Lille and has been so since 2011.

He chairs the Accessibility and Inclusion Forum for the Chartered Institute of Logistics and Transport (CILT). Peter is a Fellow of the CILT and a Fellow of the Institution of Railway Operators (FIRO).

Peter Rayner started as a junior on the railway and went on to hold a range of key positions in British Rail with many years front line contact with passengers and stakeholder organisations. Operating both at station and area level. He managed the South Eastern Division of Southern Region, was Operating Officer for Birmingham, Operating Superintendent in Manchester.

He was Chief Operating Manager and General Manager of London Midland Region, over a third of BR, and after a further spell at BR HQ, on retirement from BR, has worked as a Consultant giving advice on rail operations and safety, as well as lecturing, broadcasting and writing on transport policy and on the Accessibility and Inclusion values to the wider society.

He has acted as an Expert Witness in over fifty cases including, a number of Crown Court cases and given evidence at the Southall Accident Inquiry and the three Ladbroke Grove Inquiries conducted by Lord Cullen.

He has also been an Adviser to the Transport Select Committee on Transport.

## Appendix A: Station accessibility data

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# Appendix A: Station accessibility data

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## A1    Step-free access from street to platform

*Table 1: Step-free Key*

| Category | Description |
|---|---|
| A | This station has step-free access to (and between) all platforms, at all times trains are running, via level access, lifts or ramps (in accordance with new-build standards in terms of gradient and length). Additional station entrances or walking routes which do not meet the Category A criteria are permitted providing the additional necessary walking distance to avoid these is no more than 100m. |
| B | This station does not meet the Category A standard, but has step-free access likely to be usable by many people with reduced mobility. Access may be via ramps, up to 1:10 gradient (any length). Short end-of-platform ramps may be up to 1:7. Access between platforms may be via the street, no more than 400m. Access via level crossings is permitted providing full barriers are provided. Access routes may be via car parks, or short access roads without pavements, but otherwise routes via the street must include a pavement. Additional entrances or walking routes which do not meet the Category A or B criteria are permitted providing the additional necessary walking distance to avoid these is no more than 400m. |
| C | This station has step-free access to all platforms, but major barriers exist which are likely to restrict the ability of many people to use the station. Step-free routes do not meet the Category A or B criteria (e.g. long ramps steeper than 1:10, or the step-free route between platforms is greater than 400m). Any station with an ungated or half-barrier level crossing between platforms is in Category C or lower. Any station where step-free access is only available at certain times, or only to certain passengers, is in Category C or lower (e.g. because lifts are switched off when the station is unstaffed). |
| D | This station has step-free access to fewer than the total number of platforms. |
| E | This station has no step-free access to any platform. |

*Table 2: Network-wide data*

Step-free access from street to platform, by station category as per Table 1

| | A | B | A+B | C | D | E |
|---|---|---|---|---|---|---|
| **% of stations** | | | | | | |
| 2005 | 14% | 30% | **44%** | 25% | 16% | 15% |
| 2015 | 20% | 31% | **51%** | 23% | 13% | 13% |
| 2020 | 24% | 31% | **55%** | 21% | 12% | 12% |
| **% of total station footfall** | | | | | | |
| 2005 | 38% | 16% | **55%** | 18% | 12% | 16% |
| 2015 | 54% | 19% | **73%** | 12% | 7% | 9% |
| 2020 | 63% | 18% | **82%** | 8% | 4% | 6% |

*Table 2: Network-wide data*

Step-free access from street to platform, by station category as per Table 1

| % of stations | A | B | A+B | C | D | E |
|---|---|---|---|---|---|---|
| 2005 | 14% | 30% | **44%** | 25% | 16% | 15% |
| 2015 | 20% | 31% | **51%** | 23% | 13% | 13% |
| 2020 | 24% | 31% | **55%** | 21% | 12% | 12% |
| % of total station footfall | | | | | | |
| 2005 | 38% | 16% | **55%** | 18% | 12% | 16% |
| 2015 | 54% | 19% | **73%** | 12% | 7% | 9% |
| 2020 | 63% | 18% | **82%** | 8% | 4% | 6% |

*Table 3: Network-wide data – in chart format*

**Step-free access: % of stations by Category 2005-2015**
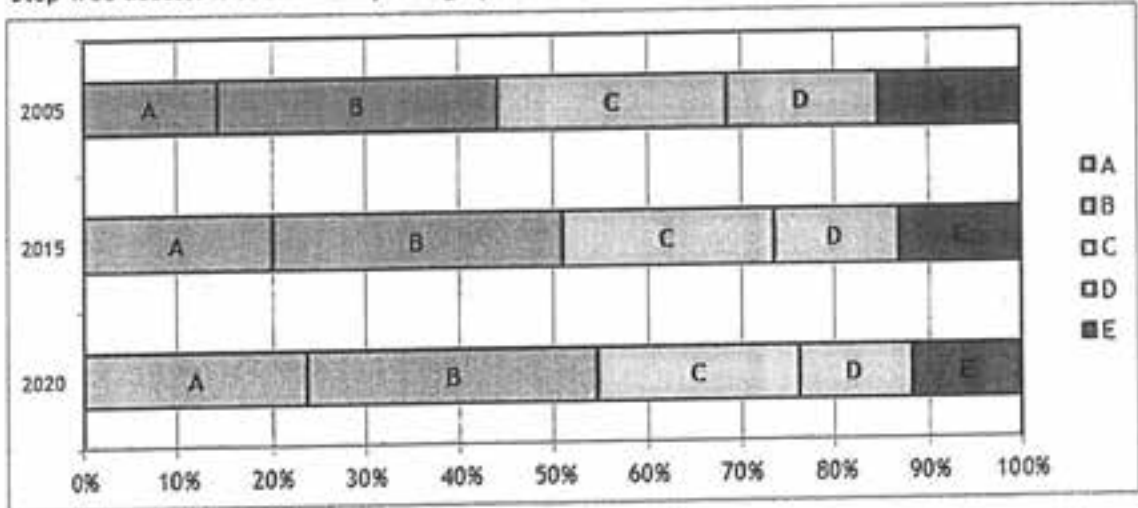


**Step-free access: % of total station footfall at stations by Category 2005-2015**



iv
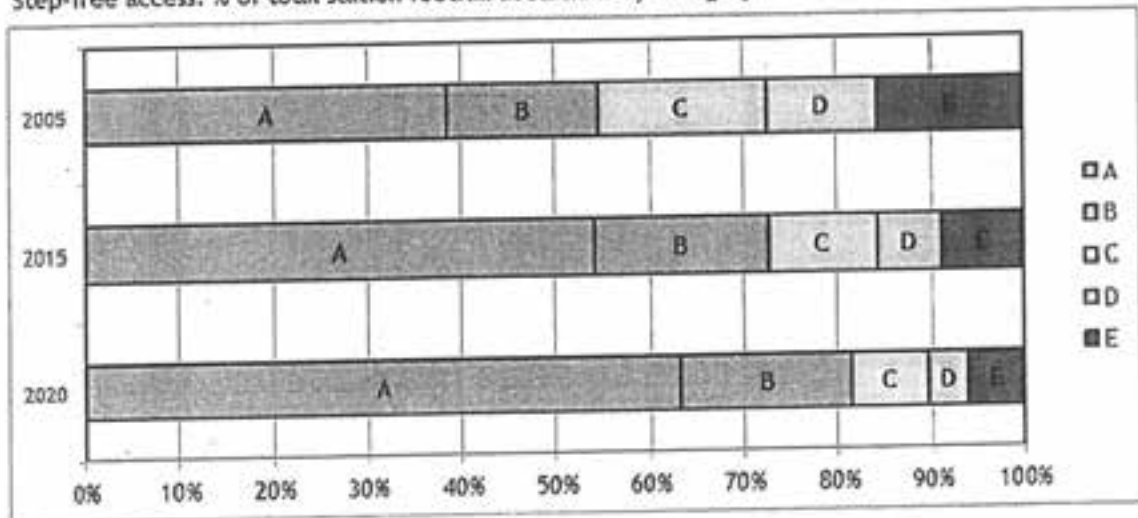
Table 4: Data by TOC – current situation

| | No stns | A | B | A+B | C | D | E |
|---|---|---|---|---|---|---|---|
| Network Rail | 17 | 82% | 12% | 94% | 6% | 0% | 0% |
| Virgin Trains (West Coast) | 17 | 76% | 12% | 88% | 12% | 0% | 0% |
| East Coast | 12 | 67% | 8% | 75% | 25% | 0% | 0% |
| Chiltern Railways | 34 | 41% | 21% | 62% | 18% | 18% | 9% |
| Arriva Trains Wales | 244 | 21% | 39% | 60% | 28% | 8% | 4% |
| Merseyrail | 65 | 26% | 34% | 60% | 8% | 9% | 23% |
| London Midland Trains | 147 | 23% | 35% | 59% | 16% | 12% | 12% |
| First ScotRail | 345 | 19% | 38% | 57% | 21% | 10% | 12% |
| First TransPennine Express | 30 | 37% | 20% | 57% | 37% | 3% | 3% |
| c2c | 25 | 24% | 32% | 56% | 20% | 20% | 4% |
| First Great Western | 210 | 20% | 33% | 53% | 22% | 11% | 13% |
| Greater Anglia | 167 | 24% | 29% | 53% | 21% | 10% | 16% |
| Southern | 155 | 19% | 29% | 48% | 21% | 21% | 10% |
| East Midlands Trains | 89 | 13% | 34% | 47% | 40% | 4% | 8% |
| Northern Rail | 463 | 10% | 37% | 47% | 31% | 12% | 9% |
| South West Trains (inc Island Line) | 185 | 23% | 22% | 44% | 18% | 22% | 16% |
| London Overground | 57 | 21% | 21% | 42% | 5% | 11% | 42% |
| Southeastern | 174 | 19% | 22% | 41% | 17% | 29% | 13% |
| Govia Thameslink Railway | 76 | 18% | 8% | 26% | 9% | 17% | 47% |
| London Underground (where listed in ORR data only) | 23 | 17% | 4% | 22% | 13% | 13% | 52% |
| Total | 2537 | 20% | 31% | 51% | 22% | 13% | 13% |

Table 5: Data by Network Rail Strategic Route – current situation

| | No stns | A | B | A+B | C | D | |
|---|---|---|---|---|---|---|---|
| Route P: Scotland East | 123 | 26% | 37% | 63% | 20% | 14% | 4% |
| Route K: (Western) | 130 | 25% | 36% | 61% | 22% | 8% | 9% |
| Route O: Merseyrail | 66 | 27% | 33% | 61% | 8% | 9% | 23% |
| Route L: Wales | 246 | 22% | 39% | 61% | 27% | 8% | 4% |
| Route F: Thameside | 26 | 23% | 35% | 58% | 19% | 19% | 4% |
| Route M: West Midlands and Chilterns | 162 | 28% | 27% | 56% | 18% | 14% | 12% |
| Route Q: Scotland West | 223 | 16% | 39% | 55% | 20% | 8% | 17% |
| Route D: East Anglia | 175 | 25% | 29% | 54% | 21% | 9% | 15% |
| Route I: East Midlands | 101 | 23% | 30% | 52% | 28% | 9% | 11% |
| Route N: West Coast Main Line | 77 | 23% | 27% | 51% | 16% | 13% | 21% |
| Route H: North Cross Pennine | 429 | 13% | 35% | 48% | 31% | 12% | 10% |
| Route J: (Western) | 71 | 23% | 25% | 48% | 15% | 17% | 20% |
| Route B: Sussex | 188 | 21% | 26% | 47% | 19% | 20% | 15% |
| Route C: Wessex | 203 | 22% | 23% | 44% | 20% | 20% | 15% |
| Route E: North London Line | 32 | 19% | 25% | 44% | 6% | 6% | 44% |
| Route G: East Coast Main Line and Northeast | 154 | 23% | 20% | 43% | 31% | 9% | 18% |
| Route A: Kent and High Speed One | 186 | 20% | 22% | 42% | 18% | 27% | 12% |

NB: some stations are included in more than one Strategic Route

## A2     Other station accessibility features

NB: where % figures are listed *in italics*, these refer to data gathered from a random sample of 40 stations across the network (see table 7 for list of stations). Otherwise data is based on information regarding all stations, as available in the public domain and/or provided by TOCs.

% figures refer to relevant stations only – for example 'Taxi rank at station' is the % of all stations with a rank, but 'Accessible taxis available on rank' is the % of those stations with a rank, where accessible taxis are available.

*Table 6: Other station accessibility features*

| | Yes | Part | No |
|---|---|---|---|
| **Access to station** | | | |
| Car park available? | *72%* | *0%* | *28%* |
| Blue badge parking available in car park? | *79%* | *0%* | *21%* |
| No. Blue Badge bays as a % of car park capacity | *6% network average* | | |
| Marked pick-up/ set down point? | *30%* | *0%* | *70%* |
| Taxi rank at station? | *23%* | *0%* | *77%* |
| Accessible taxis on taxi rank? | *33%* | *0%* | *67%* |
| | | | |
| **Access within station** | | | |
| Walking distance to platforms - average typical | *79m network average* | | |
| Automatic/ power-operated doors at the station? | *54%* | *0%* | *46%* |
| Ticket gates? | *13%* | *0%* | *88%* |
| Alternative format wayfinding? | *0%* | *5%* | *95%* |
| Wayfinding of step-free routes? | *33%* | *21%* | *46%* |
| Step-edge colour contrasting on all stairs? | *72%* | *28%* | *0%* |
| Handrails on both sides of all stairs/ramps? | *64%* | *25%* | *11%* |
| Dual height handrails anywhere on station? | *45%* | *0%* | *53%* |
| Tactile warning strip at top/bottom of all stairs? | *37%* | *40%* | *23%* |
| Lifts available at station? | 15% | 0% | 85% |
| Pedestrian level ('barrow') crossing between platforms? | 5% | 0% | 95% |
| Manifests on all relevant glass doors and panels? | *46%* | *8%* | *46%* |
| Travelators to reduce impact of walking distance? | *3%* | *0%* | *97%* |
| Vertical obstructions have visual contrast bands? | *10%* | *45%* | *45%* |
| | | | |
| **Ticket purchase** | | | |
| Ticket office? | 60% | 0% | 40% |
| Step-free access to Ticket Office? | *75%* | *13%* | *13%* |
| Ticket Vending Machines? | 53% | 0% | 48% |
| Low level/adjustable counter? | *38%* | *0%* | *63%* |
| Induction loop advertised at ticket office window? | *96%* | *0%* | *4%* |

| | Yes | Part | No. |
|---|---|---|---|
| **Staffing and assistance** | | | |
| Do all trains serving this station have a Conductor? | 81% | n/a | 19% |
| Marked meeting point for Assisted Travel? | 10% | 0% | 90% |
| Station staffed (Yes=at all times/ Part=at some times)? | 11% | 45% | 44% |
| Electric mobility buggy? | 3% | 0% | 97% |
| Customer wheelchair? | 13% | 0% | 88% |
| | | | |
| **Toilets** | | | |
| Toilets? | 38% | 0% | 63% |
| Accessible toilets? | 35% | 0% | 65% |
| Changing Places toilet? | 0.2% | 0.0% | 99.8% |
| Baby Change? | 28% | 0% | 73% |
| Toilets where available are open at all times? | 53% | 0% | 47% |
| | | | |
| **Platforms** | | | |
| Seating on all platforms? | 88% | 10% | 3% |
| Seating under shelter on all platforms? | 78% | 15% | 8% |
| Space for wheelchair users to shelter on all platforms? | 75% | 20% | 5% |
| Marked location for wheelchair users to wait on platforms? | 3% | 0% | 97% |
| Heated waiting areas on all platforms? | 8% | 40% | 53% |
| Platform width adequate for ramp deployment? | 33% | 59% | 8% |
| Platform-train stepping distance - greater than 25cm? | 33% | 0% | 68% |
| Platform edge tactile warning strips on all platforms? | 35% | 11% | 54% |
| Help points on all platforms? | 67% | 8% | 25% |
| Induction loops fitted to Help Points? | 65% | 0% | 35% |
| Induction loops on platforms (may also be on Help Points)? | 20% | 0% | 80% |
| CIS screens on all platforms? | 74% | 5% | 21% |
| CCTV in evidence on platforms? | 75% | 3% | 23% |
| Audio announcements for train departures? | 50% | 0% | 50% |
| | | | |
| **Other dedicated accessibility features** | | | |
| Train ramps located at station? | 55% | 0% | 45% |
| Luggage Trolleys? | 8% | 0% | 93% |
| Accessibility Guide/DPPP racked at station? | 10% | 0% | 90% |
| Step-free access map poster displayed at station? | 10% | 0% | 90% |
| Priority Seating available? | 3% | 3% | 95% |
| Walking stick holder at ticket office window? | 3% | 0% | 97% |
| Seating at varied heights? | 8% | 0% | 93% |

*Table 7: Random sample of stations*

NB: stations were selected at random, subject to an allocation per Station Operator in proportion to the number of stations operated, with all franchised Station Operators having a minimum of one station included in the sample.

| Station | Operator |
|---|---|
| Alloa | First ScotRail |
| Bank Hall | Merseyrail |
| Barnes | South West Trains |
| Berney Arms | Greater Anglia |
| Bournville | London Midland Trains |
| Bridgend | Arriva Trains Wales |
| Cheadle Hulme | Northern Rail |
| Chippenham | First Great Western |
| Claygate | South West Trains |
| Coventry | Virgin Trains (West Coast) |
| Cuffley | Govia Thameslink Railway |
| Devonport | First Great Western |
| Emsworth | Southern |
| Farringdon | London Underground |
| Helensburgh Central | First ScotRail |
| Hindley | Northern Rail |
| Honeybourne | First Great Western |
| Horsley | South West Trains |
| Hykeham | East Midlands Trains |
| Kidbrooke | Southeastern |
| Kilpatrick | First ScotRail |
| Llangammarch | Arriva Trains Wales |
| Llanwrtyd | Arriva Trains Wales |
| Lochgelly | First ScotRail |
| Manchester Piccadilly | Network Rail |
| March | Greater Anglia |
| Mobberley | Northern Rail |
| New Mills Newtown | Northern Rail |
| Saunderton | Chiltern Railways |
| Shepherds Bush | London Overground |
| Southend East | c2c |
| Streatham | Southern |
| Thornaby | First TransPennine Express |
| Thorntonhall | First ScotRail |
| Walsden | Northern Rail |
| West Wickham | Southeastern |
| Wetheral | Northern Rail |
| Whalley | Northern Rail |

| Station | Operator |
|---|---|
| Wootton Wawen | London Midland Trains |
| York | East Coast |

## A3    Additional station accessibility issues

Table 6 (*Other station accessibility features*) indicates where a % of stations do not have the feature specified. This may cause a range of issues for older and disabled people. In addition, the following issues have been identified, but no quantification has been possible:

*Table 8: Additional station accessibility issues as identified*

| Issue | Notes |
|---|---|
| Assistance provided by friends and relatives at gated stations | Many passengers are assisted to board/ alight from trains by friends and relatives, which can reduce the need for staff assistance. Where stations are gated this may be difficult. Some stations permit access for non-travellers, such as Plymouth, where a 50p charity donation is requested. In other locations access may be refused. Requesting a donation from someone assisting a passenger may be inappropriate. |
| Accuracy of station step-free access information | In some cases, information provided in the public domain regarding step-free access is incorrect - on station posters, industry publications and online. For example at Morpeth lifts were opened in September 2012, but by November 2014 they were still not shown on Stations Made Easy (the National Rail Enquiries station wayfinding system). |
| Appropriate language | E.g. the Station Welcome Poster at Bank Hall says 'no disabled access'. It's likely that most passengers know what this means, but even so, 'no step-free access' would be more appropriate. |
| Availability of induction loops at information desks etc. | Although induction loops are often fitted at Ticket Office counters, they are less commonly found at information desks and other points where passengers interact with staff - such as at the platform information desk at Wigan Wallgate. |
| CIS screen text size and visibility | Passenger information screens on platforms are often high up. Text size and visibility can be an issue. |
| Complexity of policies and public information | Whilst the railway is inherently complicated, policies and information do not necessarily have to be. However, in some cases passengers are expected to be able to comprehend complex information, e.g. ticket and route restrictions. Complexity may be a significant challenge for some PRMs. |
| Font size | Some important information, such as train times, is printed in a very small font on posters. Although there are issues around how to convey complex and detailed information, the current typical practice may cause difficulties for some PRMs. |
| Leaflet racks | Leaflet racks in general are designed so that some leaflets are only available from a high position. |

| Issue | Notes |
|---|---|
| Use of colour to impart meaning | Some poster and wayfinding information is provided in a format which requires the reader to have colour vision. This may prevent understanding by some PRMs. |
| Accessibility of connecting public transport modes | Passengers do not travel from station to station - there are always connecting modes of transport. E.g. at Marylebone the National Rail station has step-free access, but the Underground doesn't. At present, the National Rail Enquiries station information for Marylebone makes no reference to the accessibility of the Underground. |
| Design/ maintenance of Blue Badge bays | At some stations Blue Badge bays do not incorporate hatched access areas, or are poorly marked. |
| Misuse of Blue Badge parking facilities | Misuse of Blue Badge parking bays may prevent passengers who need them getting access. Fraudulent use of Blue Badges is believed to be widespread. Sometimes parking bays are an easy target for e.g. skips during temporary building works, or parking by contractors. |
| Availability and use of Blue Badge parking bays | Across the network, there are a range of issues relating to capacity, use and pricing. |
| Pick-up/ set down points are often inadequate | Many stations have no formal pick-up/set down point, or this has accessibility issues. E.g. at Coventry there is one, but it adjoins a narrow island with no dropped kerbs. |
| Carriage of baby buggies | Some TOCs request that passengers fold baby buggies. However this is likely to be seen as impractical by many parents. |
| Barrow crossings | Pedestrian level crossings at stations ('barrow crossings'), allow step-free access between platforms. E.g. at Llanwrtyd the crossing is the only means of access across the tracks, but no protection is available from passing trains. There are no barriers or warning lights etc. At some stations barrow crossings are available with staff assistance only, but at many smaller rural stations the crossings are unsupervised. |
| CCTV and perceptions of personal security | CCTV is provided at many stations, but perceptions of personal security are influenced by many other factors. Some PRMs may be dissuaded from travel by a fear of crime. |
| Emergency exits | Often, station emergency exits do not have step-free access, e.g. at Farringdon. |

| Issue | Notes |
|---|---|
| Inconsistency of platform edge tactile strips | At some stations, tactile strips are found on some platforms and not others. Some passengers will find tactile strips on one station they use, but not on another. This leads to the risk that a passenger might expect to find a strip where there isn't one. Also concerning is where only part of a platform face has a strip, e.g. Platform 2 at Elmers End, with obvious potential consequences. |
| Level crossing accessibility | At some stations the step-free or the only route between platforms is via a level crossing, which may have a number of accessibility and safety issues. E.g. at Hykeham there is an Automatic Half Barrier Crossing where there are warning lights, but barriers do not prevent pedestrians on two of the four approach pavements walking onto the crossing when a train is due. |
| Platform gradient towards edge | There have been a number of incidents where baby buggies have rolled or been blown onto the track from platforms, e.g. at Whyteleafe. In some cases platforms slope towards the edge, as at Birmingham Moor Street, where a gradient starts next to a wide aisle ticket gate (where a buggy or wheelchair might conceivably be stopped while a parent, user or companion looks for a ticket). |
| Position of platform edge tactile strips | Tactile strips are often found inside the 'Danger Area' as indicated by the Yellow Line on the platform. But this implies passengers must be inside the Danger Area before they are warned by the tactile strip, e.g. at Bridgend. London Overground and London Underground by contrast have the tactile strip outside the yellow line, which seems more logical. |
| Slip-resistance during wet weather | The polished flooring at e.g. York is very slippery when wet. In some cases station footbridges do not have weather protection, which can also lead to issues on stairs. |
| Tripping hazards | At e.g. Bank Hall station there are raised areas of the platforms without higher level hazard protection, which may be a tripping hazard for visually impaired people. |
| Yellow lines on platforms | Yellow warning lines are required to mark the Danger Area where passengers may be subject to the slipstream effect of passing trains. Based on the speed of passing trains, there are only a limited number of platforms needing this feature. In the past, many other platforms were provided with lines to warn passengers of the dangers of open train doors, the lines having other benefits such as helping parents to control children, and providing an advance visual warning of the platform edge. With Central Door Locking, some Yellow Lines are now not maintained. This may lead to inconsistency along the platform length, as at e.g. East Croydon, and may impact on some PRMs. |

| Issue | Notes |
|---|---|
| Access to replacement bus services | The Engineering Works poster at James Cook station says that 'wheelchairs' cannot be carried on replacement bus services. No alternative is offered according to the text on the poster (e.g. a taxi). |
| Accessibility of First Class Lounges | In many cases, First Class Lounges have not been designed with accessibility in mind. Access is sometimes via a high-level call button and heavy and/or narrow swing door. At e.g. Darlington, the First Class Lounge would be very difficult to navigate around for wheelchair users. The impression given is that the station operator assumes disabled people will not be using the lounge. |
| Waiting room accessibility | E.g. the waiting room at Wigan Wallgate does not have step-free access, although there is a lift to the platforms. |
| Signage of step-free routes | Step-free routes should according to the PRM-TSI and Code of Practice be signed using the International Symbol of Access (a blue wheelchair symbol). But there is a wide variety of approaches to signage, depending on the station operator. This lack of consistency may affect the ability of passengers to navigate around the network. At some stations, alternative step-free routes are not signed at all. |
| Station sign design – visibility | The station signage at e.g. Hykeham includes a border as per the Code of Practice, to aid visibility. However, some TOC signage is less visible - at e.g. Tamworth there is no sign border on the station name signs. This may cause visibility issues, especially at night. |
| Availability of low level ticket counters | Low level counters are frequently closed, while other counters are open (e.g. at Leeds). It is believed this is often because staff do not find the counters easy to work at due to poor ergonomics etc. |
| Induction loop field strength | Induction loops at ticket office counters may not function effectively. Staff may not know how to operate or test them. They may be subject to interference from electric trains and steel counters. |
| PERTIS machines – accessibility | A number of older PERTIS (Permit to Travel) machines still exist, e.g. at Iver. These machines do not meet modern accessibility standards |
| Ticket office opening hours | Most stations have limited Ticket Office opening hours, as at e.g. Hindley. Some PRMs prefer to buy tickets face-to-face, and some may not be able to use the internet or Ticket Vending Machines. Some tickets are only available from Ticket Offices (for example non-Railcard discounts for visually impaired people and wheelchair users) |
| Ticket Vending Machine positioning | Ticket Vending Machines (TVMs) are sometimes inappropriately placed, e.g. on a raised plinth, undermining their potential accessibility. |

| Issue | Notes |
|-------|-------|
| Ticket Vending machine usability | Modern TVMs are almost all touch-screen, and rely on the user being able to see the screen. This can be a significant barrier to use for visually impaired people. The effects of glare/sunlight can exacerbate this, where TVMs are not protected from sunlight, e.g. at Meadowhall. |
| Use of alternative routes for accessibility reasons | Non-train-specific tickets are based on 'Permitted Routes' from A to B. But some passengers must vary their route to arrive on a step-free platform (e.g. where there is only step-free access to one platform, or no access between platforms, and circulating via the next station is an option). TOCs may apply discretion, but whilst they may informally allow disabled people to vary their route, many PRMs could find themselves in trouble if they travel outside the validity of their ticket for accessibility reasons. |
| Availability of toilet facilities | Several very busy stations have no toilet facilities, e.g. West Ham. At other stations, toilets are locked when unstaffed. With the likely reduction in ticket office opening hours as Smartcards etc. are more common, this issue may get worse. Some stations with toilets do not have accessible toilets. Some accessible toilets are not of new-build standard and may have usability issues. |
| Access through forecourts - pavements and accessibility | Pedstrian access through station forecourts, including for wheelchair users, is sometimes poor. E.g. at Newark Northgate there is no step-free pedestrian route through the forecourt. Pavements where present have no dropped kerbs. |
| Accessibility of station trading outlets such as buffets etc. | At e.g. Coventry the buffet on Platforms 2/3 does not have step-free access. Such facilities are often considered part of the station by passengers, but accessibility issues are not covered directly by the station operator and may only get a passing reference in the DPPP. |
| A-frame moveable posters | Portable 'A frame' poster displays/signs are used by both station operators and commercial tenants, e.g. at Emsworth. They may cause an obstruction, and may not be in the same position each day, which can cause difficulties e.g. for visually impaired people. |
| Boarding and alighting with a baby buggy | Boarding and alighting with young children or a baby buggy can be hazardous. In some cases TOCs provide advice as to how to reduce the risks. |
| Crowding | Certain parts of the network can get very crowded at times, e.g. the concourse at London Victoria. This can cause difficulties for some PRMs |
| Gates to platforms | Some gates can only be opened from one side, or by leaning over. Whilst in some rural areas there are good reasons for providing gates, in many cases these do not meet modern accessibility standards. |

| Issue | Notes |
|---|---|
| Platform width, in relation to ramp deployment | The PRM-TSI and Code of Practice mandate a minimum of 1.5m between the bottom of a platform-train ramp and the nearest obstruction, to enable wheelchair users to navigate on and off the ramp. In general Network Rail works to a Group Standard minimum platform width of 2.5m. Taking into consideration platform-train stepping distances (which determine ramp length as there is a maximum permitted gradient of 18%), 2.5m is usually inadequate. At e.g. Kidderminster, a new footbridge and lift shaft has been built leaving insufficient clearance to deploy a ramp while meeting the turning circle and gradient requirements. |
| Pull-along luggage on escalators | Many passengers travel with wheeled luggage, and find using escalators convenient. But signs at stations often prohibit using escalators with luggage on safety grounds. Observations at e.g. St Pancras (Low level) suggest almost all passengers ignore the warning signs. The lift capacity at St Pancras would not be adequate if all passengers with luggage switched to using the lift. A solution is required which combines capacity and speed with safety. |
| Quality of dropped kerbs | At e.g. West Wickham there is a dropped kerb to the station entrance, but at a gradient of approximately 25%. This is likely to be impossible for a wheelchair user to navigate safely without assistance |
| Ramp gradient | The ramps to Platforms 5-8 at Newcastle are at a gradient of up to 1:7.5, and there are no lifts to these platforms. For some PRMs this will be a significant barriers to access. |
| Use of portable steps at low platforms | Portable steps may help some passengers to access trains at low platforms, as at e.g. Plockton. But they are not fixed to the ground and do not have handrails, and therefore may be hazardous |
| Request stops | Some stations are request stops, which means passengers must signal to the driver if they wish to board, and alert the Conductor if they wish to alight. This may not always be possible for some PRMs. At e.g. Wootton Wawen, oncoming trains cannot be seen from inside the waiting shelter. |
| Short platforms - range of issues | At some stations trains are longer than the platform. This causes a range of issues including access to wheelchair spaces, and the need to move through the train when alighting. E.g. at Honeybourne only the rear four carriages of an HST stop on the platform. |

| Issue | Notes |
|-------|-------|
| Staff availability | Staff are valued by older and disabled passengers to provide assistance, information and reassurance. In many cases, staff on stations are not there primarily to provide these functions. As technology reduces the need for staff presence, e.g. due to new ticketing technology, this can have an impact on how staff can contribute to an accessible railway. E.g. at High Wycombe the gateline is not staffed but has a Help Point for any problems. |
| Faded step edge contrasting | At e.g. Emsworth the step-edge contrasting is faded, an issue repeated at many stations where this type of painted contrasting relies on constant maintenance. |
| Inadequate step edge contrasting | The Code of Practice states that step edges must include a continuous contrasting band on the step and riser. But at e.g. Farringdon only a dotted line is provided, with reduced contrast. |
| Time allowed to walk to trains following platform allocation | E.g. the 0749 departure from Euston to Birmingham New Street on 18/8/14 was only announced on the concourse at 0746, but the train departed on time, 3 minutes later. The train was formed of 4 carriages, departing from the far end of Platform 10 (behind another train), approximate walking distance 200m which means passengers had to be able to walk at a minimum speed of 4km/hour to catch the train. |
| Waiting position on platforms - all passengers | For those 'in the know', car stop marks show where a train will stop, dependent on its length and sometimes stock type. But this is not customer-facing information, and with a few exceptions such as at e.g. Coventry, no information is give on where a train will stop on the platform. Some stations such as East Croydon have trains from 2-12 carriages in length calling at the same platform. |

## Appendix B: Rail vehicle accessibility data

Contents

## B1 Compliance with Accessibility Regulations

By 1st January 2020, all rail vehicles must comply with either the TSI-PRM, or RVAR, unless exemptions are granted. The following tables show current compliance with either of these regulations (vehicles are assumed compliant if current exemptions are in force and will remain so beyond 2019). It should be noted that there will be significant additions to the fleet before 2020, and some withdrawals.

*Table 1:*     *Compliance by TOC*

| TOC | Compliant Units | Compliant Vehicles | Non-compliant Units | Non-compliant Vehicles | % Compliant Units | % Compliant Vehicles |
|---|---|---|---|---|---|---|
| c2c | 74 | 256 | 0 | 0 | 100% | 100% |
| Heathrow Connect | 5 | 20 | 0 | 0 | 100% | 100% |
| Heathrow Express | 14 | 61 | 0 | 0 | 100% | 100% |
| Hull Trains | 4 | 20 | 0 | 0 | 100% | 100% |
| London Overground | 85 | 324 | 0 | 0 | 100% | 100% |
| Transpennine Express | 60 | 171 | 0 | 0 | 100% | 100% |
| Virgin Trains | 76 | 674 | 0 | 0 | 100% | 100% |
| Cross Country | 86 | 325 | 5 | 35 | 95% | 90% |
| London Midland | 119 | 391 | 46 | 122 | 72% | 76% |
| Southern | 249 | 963 | 70 | 304 | 78% | 76% |
| Scotrail | 180 | 556 | 113 | 242 | 61% | 70% |
| South West Trains | 254 | 1043 | 145 | 516 | 64% | 67% |
| Southeastern | 177 | 792 | 190 | 674 | 48% | 54% |
| Grand Central | 5 | 20 | 3 | 18 | 63% | 53% |
| East Midlands Trains | 25 | 133 | 67 | 177 | 27% | 43% |
| Greater Anglia | 128 | 478 | 147 | 642 | 47% | 43% |
| Chiltern | 23 | 75 | 44 | 119 | 34% | 39% |
| Thameslink/ Great Northern (GTR) | 65 | 260 | 153 | 491 | 30% | 35% |
| Arriva Trains Wales | 27 | 70 | 99 | 196 | 21% | 26% |
| First Great Western | 30 | 99 | 158 | 625 | 16% | 14% |
| Northern | 16 | 64 | 304 | 641 | 5% | 9% |
| East Coast | 0 | 0 | 44 | 396 | 0% | 0% |
| Merseyrail | 0 | 0 | 73 | 219 | 0% | 0% |
| **Totals** | 1718 | 6855 | 1661 | 5417 | 51% | 56% |

*Table 2:   Compliance by Network Rail Strategic Route*

| TOC | Compliant | | Non-compliant | | % Compliant | |
|---|---|---|---|---|---|---|
| | Units | Vehicles | Units | Vehicles | **Units** | **Vehicles** |
| Route E: North London Line | 85 | 324 | 0 | 0 | **100%** | **100%** |
| Route F: Thameside | 74 | 256 | 0 | 0 | **100%** | **100%** |
| Route M: West Midlands and Chilterns | 300 | 1457 | 119 | 324 | **72%** | **82%** |
| Route Q: Scotland West | 364 | 1634 | 148 | 547 | **71%** | **75%** |
| Route P: Scotland East | 364 | 1634 | 146 | 625 | **71%** | **72%** |
| Route B: Sussex | 391 | 1531 | 166 | 688 | **70%** | **69%** |
| Route C: Wessex | 254 | 1043 | 145 | 516 | **64%** | **67%** |
| Route N: West Coast Main Line | 341 | 1706 | 408 | 863 | **46%** | **66%** |
| Route A: Kent and High Speed One | 242 | 1052 | 236 | 858 | **51%** | **55%** |
| Route D: East Anglia | 219 | 778 | 200 | 774 | **52%** | **50%** |
| Route I: East Midlands | 164 | 688 | 397 | 954 | **29%** | **42%** |
| Route H: North West | 194 | 729 | 358 | 1138 | **35%** | **38%** |
| Route J: London and West | 106 | 431 | 194 | 752 | **35%** | **36%** |
| Route K: West of England | 57 | 251 | 168 | 684 | **25%** | **27%** |
| Route L: Wales | 76 | 244 | 211 | 713 | **26%** | **25%** |
| Route G: East Coast Main Line and Northeast | 126 | 462 | 551 | 1539 | **19%** | **22%** |
| Route O: Merseyrail | 0 | 0 | 73 | 219 | **0%** | **0%** |

NB: some units operate on more than one Strategic Route

## B2     Data not relating to compliance

Trains have been allocated to one of 5 categories: Inner suburban; Outer suburban; Regional local; Regional Express; and InterCity. This has been a matter of judgment based on vehicle design characteristics and typical use. Each of the following tables describes a feature likely to be of importance to older and disabled people.

Table 3:     Breakdown of fleet by category

|  | Units | Vehicles |
|---|---|---|
| Inner suburban | 796 | 2875 |
| Outer suburban | 1290 | 4883 |
| Regional local | 536 | 1047 |
| Regional express | 456 | 1281 |
| InterCity | 301 | 2186 |
| **Total** | **3379** | **12272** |

Table 4:     Toilet available on-board

| Unit type | Toilet? | Accessible toilet? |
|---|---|---|
| Inner suburban | 40% | 7% |
| Outer suburban | 100% | 80% |
| Regional local | 95% | 7% |
| Regional express | 100% | 56% |
| InterCity | 100% | 100% |
| **All units** | **85%** | **50%** |

NB: the provision of an accessible toilet is a compliance issue where other toilets are available

Table 5:     On-board customer service staff available

| Unit type | Always | Sometimes | No |
|---|---|---|---|
| Inner suburban | 39% | 30% | 31% |
| Outer suburban | 53% | 25% | 21% |
| Regional local | 100% | 0% | 0% |
| Regional express | 85% | 10% | 5% |
| InterCity | 100% | 0% | 0% |
| **All units** | **66%** | **18%** | **16%** |

*Table 6:*   % *of units with wide door vestibules*

Wide vestibules provide flexibility to accommodate additional wheelchair users at times of peak demand, also they may also be useful for parents with baby buggies, and people with luggage.

| Unit type | Wide | Narrow |
|---|---|---|
| Inner suburban | 71% | 29% |
| Outer suburban | 93% | 7% |
| Regional local | 36% | 64% |
| Regional express | 34% | 66% |
| InterCity | 0% | 100% |
| **All units** | **63%** | **37%** |

NB: 'Wide' – a judgment has been made on whether a vestibule could accommodate a wheelchair user without blocking other passengers.

*Table 7:*   *1ˢᵗ Class available*

| Unit type | 1st Class available? | 1st Class including wheelchair space? |
|---|---|---|
| Inner suburban | 1% | 0% |
| Outer suburban | 80% | 0% |
| Regional local | 0% | 0% |
| Regional express | 65% | 0% |
| InterCity | 100% | 96% |
| **All units** | **48%** | **9%** |

NB: it is permitted to have $1^{st}$ Class without a wheelchair space in some circumstances – this is not a compliance issue

*Table 8:*   *Reservable seating*

| Unit type | Yes | No |
|---|---|---|
| Inner suburban | 0% | 100% |
| Outer suburban | 0% | 100% |
| Regional local | 0% | 100% |
| Regional express | 32% | 68% |
| InterCity | 100% | 0% |
| **All units** | **13%** | **87%** |

## B3    Survey of train journeys

*Table 9:*    *Sample journey data*

During the collection of sample station data (see Appendix A), 99 trips were made across the network. As the stations were selected at random, data collected is assumed to be a reasonable reflection of the network.

|  | Yes | Part | No |
|---|---|---|---|
| Conductor visible at least once during journey (where present)? | 71% | n/a | 29% |
| Passenger Information System (PIS) screen fitted? | 61% | n/a | 39% |
| PIS audio working (all stops announced)? | 80% | 0% | 20% |
| PIS visual working (all stops announced)? | 83% | 2% | 13% |
| Manual or PIS announcements made for all stops? | 80% | 13% | 8% |

NB: Conductor visibility assessed from a seated/standing single position during the journey – no attempt was made to find the Conductor or walk through the train, or board a particular carriage. Visibility on the platform when boarding/alighting was not included. 21 trains used were DOO, these have not been included.

## B4    Other rail vehicle issues

*Table 10:    Rail vehicle issues*

The following is a list of identified issues which may impact on older and disabled people. Issues reflected in data elsewhere, or specifically relating to compliance, are not included.

| Issue | Details |
|---|---|
| Emergency evacuation information | Very few train emergency evacuation instructions make any reference to disabled people, or other people who may not be able to move to another carriage, or alight from the train between stations. |
| Short platforms | At many locations trains are longer than platforms, e.g. Honeybourne. Passengers may have to move through the train which may be difficult or impossible (e.g. for wheelchair users). For some journeys it is not possible to board at the same position the passenger needs to alight. |
| No corridor connection between multiple units | Most trains are formed of units which may run in multiples of 2 or 3. Where corridor connections are not available between units (e.g. Class 142 units), this impacts on the ability of staff to assist passengers and provide reassurance and visibility, and where relevant sell tickets. |
| Variation across the fleet – components and position of facilities | Across the network there are significant variations in rolling stock layout and components, e.g. position and signing of Priority Seating, location of wheelchair spaces etc. In many cases there appears to be no good reason for the inconsistency. For example, Class 375 trains have the open/close door buttons in the reverse position to almost identical Class 377 trains. Similar issues exist with toilet door buttons where there is a wide variation of layouts and differences in locking/unlocking procedures. |
| Reservable seats - too many reserved | On some Intercity trains, a very high proportion of seats are reserved (for example because the TOC offers seat reservations free with all tickets). However, a significant proportion of passengers do not occupy the seat they have reserved. This may mean a passenger may have to walk through the train looking for an unreserved seat, even though many reserved seats are not in fact occupied |

| Issue | Details |
|---|---|
| On-train catering | Some trains have catering trolleys. But some only have a fixed buffet/shop. Passengers wanting to access the catering services may have to walk through the train, which may not be possible for some people. |
| Marking of Priority Seats | There is no industry standard for Priority Seating - so a huge variety of signage is used. |
| Conflict with cycles in wheelchair space | Some trains permit carriage of cycles in the wheelchair space. This may cause conflicts with wheelchair users. |
| Conflict with luggage in wheelchair space | Most TOCs advertise that luggage may not obstruct wheelchair spaces. Where this is not monitored (for example on DOO trains), or where inadequate luggage space has been provided, this may still occur. |
| HST door handles | High Speed Trains (HSTs) only have door handles on the outside - this may cause difficulties for some passengers when alighting. |
| On-train seat availability | As crowding becomes more significant, the chance of finding a seat on a train is reduced. Some suburban trains have few seats, e.g. on London Overground. This may be a significant barrier to access. Crowding may also affect the ability for PRMs to move through the train, for example to toilets. |
| Carriage of mobility scooters | Most but not all TOCs accept mobility scooters, but policies vary across the network. Scooter users may have difficulties due to limited space on some trains. There remain issues relating to safety when boarding and alighting, and in terms of the ability of more powerful scooters to damage train doors etc. |