**TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP**

**EXECUTIVE COMMITTEE**

**8 JANUARY 2019**

**CONSULTATIONS**

**REPORT BY SENIOR STRATEGY OFFICER**

This report seeks approval of proposed consultation responses to Transport Scotland's Transportation Noise Action Plan (TNAP) 2019-2023 and to the Office of Road and Rail's 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy'.

## 1    RECOMMENDATIONS

1.1    That the Executive Committee:
   (i)    approves the proposed consultation response to Transport Scotland's Transportation Noise Action Plan (TNAP) 2019-2023, as detailed in Appendix A; and
   (ii)   approves the proposed consultation response to the Office of Road and Rail's 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy', as detailed in Appendix C.

## 2    BACKGROUND

2.1    The Scottish Government issued a consultation on 15 October, 2018 on a Draft Noise Action Plans for the four largest agglomerations including Dundee, with responses to be submitted by 23 November 2018.  An officer response was submitted on the 23 November 2018 which was endorsed by the Tactran Partnership Board on 18 December 2018 (Report RTP18/47 refers).

2.2    On the 5 December 2018, the Scottish Government issued for consultation a Transportation Noise Action Plan, with responses requested by 16 January, 2019.  The Transportation Noise Action Plan covers those areas not covered by the Draft Noise Action Plans for the four largest agglomerations.

2.3    The Office of Road and Rail (ORR) issued a consultation on 'Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy' on 14 November 2018, and have requested responses to be submitted by 18 January 2019.

2.4    At its meeting on 18 December 2018, the Partnership agreed to delegate authority to the Executive Committee to consider and approve the Tactran response to both of these consultations (Report RTP/18/47 refers).

## 3 DISCUSSION

Transportation Noise Action Place (TNAP) 2019 - 2023

3.1 The Environmental Noise (Scotland) Regulations 2006 places responsibility on the Scottish Ministers to prepare and approve Transportation Noise Action Plans. Accordingly the Scottish Government issued consultation on:

- Draft Noise Action Plans for the four agglomeration areas of Aberdeen, Dundee, Edinburgh and Glasgow
- Transportation Noise Action Plan, which covers the rest of Scotland

3.2 The Scottish Government issued on 15 October draft Action Plans for the four agglomerations, requesting responses by 23 November, 2018. As the consultation period did not allow responses to be considered by the Partnership Board, or delegated to and considered by the Executive Committee, an officer response was submitted which was subsequently endorsed by the Partnership at its meeting on 18 December 2018 (Report RTP/18/47 refers).

3.3 On the 5 December, the Scottish Government issued for consultation a Transportation Noise Action Plan, requesting responses by 16th January, 2019. The Plan includes:

- 19 candidate road traffic noise management areas in the Tactran region (in; Bridge of Allan, Dunblane, Glenfarg, Perth and Stirling; and along the A9 through Stirling) and 1 rail candidate noise management area (in Stirling)
- A proposed prioritisation process for identifying whether candidate noise management areas should be declared noise management areas
- An action plan (2018-2023), identifying proposed actions to support noise management areas.

3.4 The consultation seeks views on specific elements of the Transport Noise Action Plan and poses 7 questions. These are:

- What are your views on this overall approach [of the TNAP]?
- What are your views on the prioritisation process?
- What is your view on the TNAP Key Objectives and actions?
- Do you consider there has been anything left out of the action plan using this approach? If so, what do you consider has been omitted?
- What are the key issues you consider should be discussed at the Noise Inspection Panel?
- Do you consider enough is being done to protect Quiet Areas?
- How can other stakeholders play their part in supporting delivery of the TNAP?

3.5 The Partnership is asked to consider and approve the proposed Tactran response to these questions, as detailed in Appendix A to allow submission by the deadline of 16 January 2019.

Improving Assisted Travel

3.6    The consultation sets out proposals to change the Disabled People's Protection Policy Guidance for train and station operators on their policies for helping disabled people to travel by rail.

3.7    It is the culmination of the work the Office of Road and Rail (ORR) has undertaken so far to understand passengers' experience of this service and to develop proposals that are designed to bring greater quality, consistency and reliability to the assistance available for disabled passengers.

3.8    The ORR is consulting on proposals to:

- Increase the reliability of assistance for disabled passengers by introducing a new standardised handover process for all Great Britain mainline stations. This will work in tandem with new arrangements to strengthen communication between stations and measures to introduce greater accountability for assistance provision.
- Improve accessible journey planning by standardising key station accessibility information on facilities, step-free access and staffing to provide a better and more accurate picture of what disabled passengers can expect at each station.
- Reduce the notice period for booking assistance, currently up to 24 hours before travel, we are consulting on three options for passengers; booking by 10pm the night before travel, booking a minimum of 6 hours before travel and booking a minimum of 2 hours before travel.
- Ensure all train companies provide compensation to passengers if they do not receive the assistance they have booked.
- Standardise and improve information for passengers including a more concise passenger leaflet focused on what to expect before travelling, at the station, on the train and if things go wrong. ORR is also recommending the Rail Delivery Group promote Assisted Travel to the people who would benefit from this service but do not currently travel by rail.
- Strengthen train and station operators' staff training including involving disabled people in its delivery and requiring staff to have refresher training at least every two years. This would ensure disabled passengers, including those with hidden disabilities, receive a better, more consistent service from all staff whether they book assistance in advance or travel spontaneously.

Appendix B summarises the key consultation proposals.

3.9    The proposed guidance is a comprehensive set of proposals based on work with representative groups as well as considerable experience accumulated over time by the rail industry.  This earlier work has identified many of the reasons why passengers may fail to have the confidence in travelling by train or fail to receive the level of service they expect.  Accordingly the guidance seeks to address these issues.  In doing so the proposed guidance seeks to both raise the standard and improve the consistency of providing 'Inclusive/Accessible' travel across the rail network.

3.10 The Partnership is asked to consider and approve the proposed Tactran response, as detailed in Appendix C to allow submission by the deadline of 18 January 2019.

## 4    CONSULTATIONS

4.1 The relevant officers from constituent Councils have been informed that Tactran is submitting responses to the two consultation documents. However the timescale for submission has not permitted consultation on the proposed responses outlined in Appendices A and C.

## 5    RESOURCE IMPLICATIONS

5.1 There are no resource implications arising directly from this report.

## 6    EQUALITIES IMPLICATIONS

6.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no major issues have been identified.


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## **NOTE**

The following background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in preparing the above Report.

Report to Partnership RTP/18/47, General Consultations, 18 December 2018

Draft noise action plans: consultation, Scottish Government, 15 October 2018

Consultation on Transportation Noise Action Plan, Transport Scotland, 5 December 2018

Improving Assisted Travel – A consultation on changes to guidance for train and station operators on Disabled People's Protection Policy (DPPP), Office of Rail and Road, 14 November 2018

**Proposed response to Transport Scotland's 'Transportation Noise Action Place (TNAP) 2019 – 2023' Consultation**

*Question 1*
*The overall approach of the TNAP is as follows.*
- *Firstly to continue to ensure noise management is incorporated into all transport-related activities, across the spectrum of design, construction, maintenance, policy, and point-to-point transportation activities.*
- *Secondly, to further seek to manage noise levels where necessary and practicable at Noise Management Areas (NMAs), and aim to preserve environmental noise quality where it is good.*

*What are your views on this overall approach?*
**Tactran welcomes the holistic approach to the management of transport based noise and the recognition that many of the mitigation/noise reduction measures can be incorporated into existing processes and work streams. However, greater clarity should be provided on who is responsible for specific areas of work and more detail provided regarding the specific roles to be taken by the various partners and stakeholders.**

*Question 2*
*The TNAP prioritisation process, including the Building Prioritisation Score (BPS), Source Prioritisation Score (SPS), and Candidate Noise Management Areas (CNMAs), is defined in Section 4 of the TNAP.*
*What are your views on the prioritisation process?*
**In terms of the analysis, mapping, evaluation and auditing the prioritisation process is clear and comprehensive and provides a robust evidence-based decision making tool. However, there is less clarity on the "actions" part of the matrix and more details should be provided regarding the processes to be adopted for cost benefit analysis and determining the source of funding for any resultant actions associated with a NMA.**

*Question 3*
*The TNAP has 4 key objectives, with a series of actions (16 in total) ascribed to these.*
*What is your view on the TNAP Key Objectives and actions?*
**The objectives and actions within the TNAP should better reflect other, related transport strategies and action plans. For example, reflecting that increasing mode share of active and sustainable travel will reduce car usage and have a positive impact on reducing transport related noise.**

**Also, the investment in EV infrastructure and promotion of EV's within NMAs will help increase the uptake of quieter vehicles. Existing AQMA Action Plans and the impact that the introduction of LEZs may have on traffic volumes should be considered as part of the action plan to ensure that any synergies can be fully exploited.**

*Question 4*
*The options for managing noise within the TNAP were developed using the source, pathway, receptor model.*
*Do you consider there has been anything left out of the action plan using this approach? If so, what do you consider has been omitted?*
**The approach adopted would appear to be appropriate for the subject matter, however greater emphasis could perhaps be placed on the source by looking at the impact of mode shift and alternative vehicles technologies as noted in question 3.**

*Question 5*
*Action 1D of the TNAP is committed to establishing and operating a Noise Inspection Panel (NISP) to assess issues on Transport Noise from a source, transmission, receptor perspective to support delivery of the TNAP, and report yearly on progress.*
*What are the key issues you consider should be discussed at the Noise Inspection Panel?*
**The key issues for the NISP are to ensure that actions outlined within the TNAP are being delivered and that commitments relating to the control of noise are being realised. In particular, any new transport scheme that has been delivered in the preceding year should be assessed to ensure that noise management has been properly considered. The NISP should also continually review assumptions made during the prioritisation and cost benefit processes to ensure that these remain correct and" best value" has been achieved and appropriate outcomes have been delivered.**

*Question 6*
*There are no Quiet Areas within the TNAP, however the actions within the TNAP will take account of any defined Quiet Areas and related actions.*
*Do you consider enough is being done to protect Quiet Areas?*
**Any defined quiet areas should be highlighted within local development plans to ensure that any development or infrastructure project that has the potential to increase transport related noise takes cognisance of the QA.**

*Question 7*
*Our approach in TNAP delivery will be to work collaboratively in partnership with others.*
*How can other stakeholders play their part in supporting delivery of the TNAP?*
**It is important that stakeholders and partners integrate the TNAP into other complementary strategies and plans to ensure that benefits can be maximised. However, as noted in question 1, greater clarity should be provided on who is responsible for specific areas of work and more detail provided regarding the specific roles to be taken by the various partners and stakeholders.**

**ORR 'Improving Assisted Travel': Summary of key consultation proposals**

| Outcome for passengers | Proposal for consultation |
|---|---|
| **1. Involving disabled people in a meaningful way** ||
| **Development of policy** - the views of passenger champions, regional / local communities and user groups are considered as part of the development and review of operator policies in this area. | We have proposed a revised approvals and review process for new 'Accessible Travel Policies' / 'Inclusive Travel Policies'2 to ensure that passenger views can be considered at an early stage. |
| **Staff training** - disabled people are involved in the development / delivery of training for staff who provide assistance. | We have proposed that disabled people are involved in the development / delivery of staff training. |
| **2. Improving the quality & reliability of assistance through better information provision** ||
| **Journey planning** - passengers are provided with the key information they need to enable them to plan their journey and this is provided in accessible formats. | We have proposed a revised and condensed passenger leaflet, made available at staffed stations and online with additional formats available on request. |
| | We have proposed standardised station accessibility classifications be used by passengers, booking agents and staff. |
| **Booking assistance** - **passengers** and **staff** can book assistance with confidence that the information they have on facilities and staffing at each station is accurate and the assistance can be delivered as required; this would eliminate 'bookings that are designed to fail from the outset'. | We have proposed that operators use standardised station accessibility classifications to ensure that consistent, accurate and useful information is available online regarding station facilities. This specifically relates to the National Rail Enquiries station web pages3 and the information that sits behind this site. |
| **Transfer of key information between staff** - more formalised communication procedures between staff at different stations to ensure that passengers consistently receive assistance to alight the train. | We have proposed new procedures on communication between staff at different stations ('handover protocol'), a dedicated assistance contact number and responsible member of staff for every station. |
| **Staff contact at stations** - passengers know how to contact a member of staff at any station, either in person or remotely. | We have proposed a new requirement to ensure that, at every station, information is available on how to contact a member of staff who can provide assistance and service information: in person, via a help-point or, where there is sufficient mobile phone coverage, a freephone number. |

| Outcome for passengers | Proposal for consultation |
|---|---|
| **Train facilities** - passengers can be alerted:<br>• when wishing to purchase a 1st class ticket, if a wheelchair space is not available in a 1st class carriage; and<br>• in advance of boarding a train where an accessible toilet is known to be out of service. | We have proposed to update the existing obligations regarding information provided to passengers at the time of purchase of a ticket, and more generally information on accessible toilets when these are known to be out of service. |
| **Monitoring** - passengers can easily receive useful information on what assistance is available and how to obtain it whether directly at stations, online, by phone or through help-points and this information is relevant and up-to-date. | We have proposed to strengthen our monitoring of operators' obligations in this area. This could include mystery shopping of stations, websites, contact centres or help-points, and/or greater monitoring of social media. |
| **3. Improving the content, delivery and frequency of staff training** | |
| **Staff training** - passengers, including those with hidden disabilities, receive a better, more consistent service from all staff whether they book assistance in advance or travel spontaneously. | We have proposed to strengthen training requirements, including ensuring that:<br>• disability training includes ten fundamental elements to broaden staff understanding (including around the rights of disabled passengers) and confidence; and<br>• staff receive 'refresher' training every two years. |
| **4. Making more passengers aware of the help that is available** | |
| **Passenger awareness** - more people understand what assistance is available when travelling by rail, and how to get it. | We have proposed that Passenger Assist is marketed and promoted by the Rail Delivery Group to non-rail travellers and Disabled Person's Railcard holders. |
| | We have proposed that train operators work with local authorities, service providers and disabled access groups to promote and, where necessary, improve the service provided to assist passengers. |
| **5. Reducing the notice that passengers need to give to book assistance** | |
| **Notice period for booking assistance** - passengers can book assistance nearer to the time of travel and where possible can book and receive assistance on the same day that they choose to travel. | We have presented 3 options for further discussion that would reduce the existing 'up to' 24-hour notice period (which can often become the default period requested): booking by 10pm the night before travel; or booking a minimum of 6hours before travel; or booking a minimum of 2 hours before travel. |

| Outcome for passengers | Proposal for consultation |
|---|---|
| **6. Ensuring that passengers can easily obtain redress when things go wrong** | |
| **Redress** - passengers can receive appropriate compensation when they do not receive the assistance they have booked. | We have proposed that all operators promote their existing redress policies or introduce and promote a scheme to provide passengers with redress when they do not receive the assistance that they have booked. |
| **7. Considering passenger needs, station accessibility and staffing (on trains and at stations)** | |
| **Assistance requests** - Assistance can be provided in differing circumstances, considering passenger needs, station facilities and staff availability (on trains and at stations) to enable passengers to complete as much of their journey, as is reasonably practicable, by rail. | We have proposed to strengthen how operators consider assistance provision for passengers in differing circumstances. This could include alternative accessible transport, or using staff flexibly to enable assistance to be provided by train staff, station staff or mobile staff - where such working practices are routinely operated or can reasonably be accommodated. |
| **8. Improving the communication tools capable of being used for booking assistance** | |
| **Text relay services** - Passengers with hearing or speech impairments can easily communicate with staff in contact centres to book assistance using the latest technology. | We have proposed that operators adopt text relay services offering text-to speech and speech-to-text translation services to enable passengers to book assistance from a mobile phone, tablet, computer or existing textphone. |
| **Video-relay services** - Passengers using sign-language can connect to staff in contact centres using a remote sign language interpreter. | We propose highlighting as good practice the video relay service used in other sectors to enable communication using British Sign Language. |
| **9. Improving the service passengers when alternative accessible transport is used** | |
| **Substitute and alternative transport** – buses and taxis that are more accessible to disabled people when rail travel cannot be provided e.g. when a station is inaccessible to the passenger. | We have proposed that operators demonstrate how they have worked with third parties to use more accessible rail replacement buses and made reasonable endeavours to work with taxi companies that provide accessible taxis and give drivers appropriate disability awareness training. |
| **10. Giving clearer information to passengers that use scooters or other mobility aids** | |
| **Assistance for passengers using a mobility scooter or mobility aid** - Passengers are clear whether a mobility scooter or other mobility aid can be used on a given journey. | We have proposed that each operator's scooter policy includes a presumption of carriage, extends to other mobility aids and clearly sets out which scooters and mobility aids are permitted on board. |

**ORR 'Improving Assisted Travel': Proposed Consultation Response**

*1. What are your views on replacing 'Disabled Person's Protection Policy' with 'Inclusive Travel Policy' or 'Accessible Travel Policy'?*
**The principle of a change in title is supported. The guidance should be clearly aimed at those that require support, which includes people who are both elderly and have temporary impairments. However Tactran do not have a view on whether 'Inclusive' or 'Accessible' is used.**

*2. What are your views on our proposal to replace the current passenger facing document 'Making Rail Accessible: helping older and disabled people' with a more concise, passenger-friendly document as set out in the draft revised guidance?*
*(a) Is there anything you consider is missing from the required content?*
**The proposed required content of the information documents is supported. In addition it is suggested:**

- **The information to be provided includes "temporary reductions". Whilst this principle is supported, it is suggested that the information is clear in what temporary reductions may be reasonably covered (i.e. planned work. Lifts or toilets being 'out of order' within x hrs (1 day?) of the malfunction**
- **Information regarding services which are expected to be exceptionally busy due to a major event may also be useful information for any passengers booking in advance**
- **It is clear that the information is available in different languages**

*(b) Is this still a meaningful title for this leaflet?*
**Suggest that the title 'Making Rail Accessible: Helping older and disabled people', whilst clear and concise, does not reflect the broader group of people who may require assistance. Suggest that the title of the leaflet should reflect the title of the policy guidance, i.e. by making reference to either 'Inclusive' or 'Accessible' travel.**

*3. What are your views on requiring that stations and rolling stock accessibility information form part of the policy document, rather than the passenger leaflet?*
**Support the recommendation, especially as operators are required to provide information on facilities to all passengers. However this is provided that the information is publicised and available in alternative formats.**

**It is also vital to alert all users, especially those with learning or mobility difficulties about changes to a station. Suggest that operators and/or Network Rail develop communication strategies to let local users know about changes as soon as possible (see also Q13 and Q19 re stakeholder communications lists/methods of communication).**

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

**In addition, with regard to seeking feedback from local groups, suggest that operators are required to demonstrate how they have sought feedback, in addition to confirming that they have sought feedback. (There are potentially numerous groups that could be consulted, but suggest that the rail industry can only work towards having the best representative sample if it is clear as to who is being consulted and how).**

*5. What are your views on the wording of the classifications described in Appendix B of the draft revised Guidance provided at Annex A to this consultation?*
**The five grade classification of whether stations have step-free access is supported. Nonetheless, in line with the ethos of the exercise of giving people as much info as reasonably possible to inform their travel choice, operators should be encouraged to quantify the criteria used (e.g. length of ramps) within the station infrastructure information where reasonably possible (as is covered in Q2) This may be more easily done, and may be more necessary, for smaller stations where assistance may not always be available.**

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

*7. What are your views on the proposed development of passenger best practice guidance to inform passengers about what to expect at stations and during journeys, and the actions they can take to support rail staff in the delivery of assistance?*
**Some form of passenger best practice guidance is supported. Users as well as providers have a role to play in making any system work as smoothly as possible. However, need to be very careful that there is not unreasonable expectations placed on customers that would put them off travel.**

**The examples given in the guidance in relation to 'Passengers failing to receive basic information on what to expect at stations and the actions they can take to help assistance staff' relate principally to customers trying to be as independent as possible (or accepting offered assistance from fellow passengers), which is only natural. The particular problem quoted appears to be how the system records whether assistance was delivered and the efficiency of staff time, rather than whether someone completed their trip. This issue may be partially addressed in other ways, for example, by asking passengers to notify station staff that assistance is no longer required as soon as possible after alighting from a train.**

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

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

**Proposal is supported. It is also suggested that passengers are reminded at the time of their journey about what information has been forwarded, to provide additional comfort as well as reinforcing what they should be looking out for at their destination.**

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

**The training proposals are supported.**

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

  **Given the level of staff training and awareness that should already exist two years should be adequate, and indeed operators should be encouraged to complete the training as soon as possible.**

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

  **Suggest that refresher training (over and above the minimum training requirements) should be tailored to the priority areas for improvement for each individual operator. Most passengers will undertake most of their trips using their 'local' operator(s). And while consistency of service across the country is important, getting most trips right for most passengers most of the time is perhaps the first goal.**

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

**Recommendations are supported. However, as noted in the consultation greater focus needs to be placed on providing information to people who assume that rail travel would not work for them to make them aware of the options that do exist (See Q13).**

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

**Proposal is supported. As reflected in the text (para 5.10), not all operators have a group of passengers / organisations with which to discuss issues. Such a circulation list would assist with implementing the proposals included under Q13 as well as Q11 (groups to involve in training) and Q3 (i.e. changes to facilities).**

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

*15. What are your views on the three options we have identified for reducing the notice period for booked assistance?*
**A key objective of the proposal is to give customers greater confidence that assistance will be available compared to the customer just turning up. This has advantages for both the user and the provider.**

**While it is suggested that consistency should be sought around the shortest workable option for all operators, it would be wrong if the shortest notice period for operators like MerseyRail, TransPennine Express and Scotrail are extended. Again, we should remember that:**
- **most trips are made using 'local' operator(s) and**
- **the majority of rail trips are planned and booking assistance are often done well in advance of the shortest notice period.**

*16. How do you consider any reduction might be phased in? If so, how might this be implemented?*
**Given the resource issues to be faced in introducing the likely preferred option for passengers (i.e. 'Option 3: A minimum of 2hrs before travel'), it is assumed that phasing the introduction of minimum earlier booking times is the only reasonable course of action. The timescales proposed in para 6.24 remain challenging, especially as it is assumed these will result in unplanned service improvements not included in all current franchises.**

*17. What are your views on our proposals to strengthen how operators consider assistance provision for passengers where different modes of train operation are utilised?*
**As an increasing number of services and stations have fewer staff (i.e. conducter-less trains / un-manned stations) the issue regarding the availability of staff to support assisted travel is likely to increase.**

**The proposal seeks to provide passengers with up to date information at every stage of the journey, so they know what assistance will be given. However, where this means the journey may take significantly longer than expected (i.e. the passenger has had to travel to a station where there is assistance and then catch a taxi back to their destination) this may be considered unreasonable.**

**Where a passenger's additional time spent travelling - as a result of having to travel to the nearest manned station to their destination - may be considered unreasonable, it is suggested that operators should consider other options for helping passengers get to their desired destination (for example, staff at the nearest manned station travelling to help the passenger alight at their desired destination. Whilst there are clearly resource implications of this, it is likely that passengers will argue that this needs to be set against staff savings due to driver only trains and at unmanned stations.)**

**See also Q19 regarding the technology used to communicate with customers.**

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

*19. What are your views on our proposal that operators be required to be able to receive a call via text relay? Are there any barriers to this being adopted by all operators?*
**Proposal is supported. In addition, it is recommended that the guidance should also note that communications technology continues to change, and whilst minimum levels of service must be prescribed and provided, operators are encouraged and given flexibility to adapt communications methods as technology habits and trends adapt. Indeed it may be useful to keep this particular element of the guidance under regular review (e.g. 2 yearly).**

*20. What is your view on our proposals to improve the accessibility of substitute and alternative transport provided by train and station operators?*
**The Equality Act requires service providers to ensure that they have considered and taken reasonable action to ensure that the service they provide is accessible. The rail operator is still responsible for providing the service (of transport between two rail stations) even when this is a rail replacement bus service. Accordingly, it is suggested that in addition to the rail operators working with bus/coach/taxi operators to provide and improve accessible substitute and alternative transport as proposed in the guidance, they should also be required to set out the level of accessible substitute and alternative transport they seek to provide (and if and why it may not be possible to provide accessible transport).**

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

*22. What are your views on our proposals for the carriage of scooters contained in the draft revised Guidance? Are there any other changes to operators' policies on scooters and mobility aids we should consider as part of the guidance review?*
**Proposal is supported. However, suggest that the name of any scooter 'permit' scheme may result in staff and passengers seeing it as a requirement for permission to use a scooter, rather than as it is hopefully intended, as a helpful guide to passengers and staff that a particular scooter proposes no issues to carriage.**

**As stated the ability of certain stations/services to accommodate certain scooters can be clarified in the passenger information covered under Q2.**

*23. What are your views on our proposals to clarify the guidance to ensure:*
*(a) passengers do not unknowingly purchase tickets they cannot make full use of; and*
*(b) operators consider how, where reasonably practicable, passengers will be informed when an accessible toilet is out of order, providing sufficient time for alternative travel options to be considered as required.*

**Proposals are supported. It may be worth noting that tools to enable delivery of these objectives (of providing accurate and up to date information) are closely related to:**

- **adoption of suitable communications technology (Q19)**
- **information on station / services (Q2)**

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

**The guidance document seeks to raise the standard and improve the consistency of providing 'Inclusive/Accessible' Travel across the rail network. In doing so, care must be taken not to restrict examples of best practice by operators. Indeed, it is hoped that the higher expectations placed on operators by the guidance results in a greater number of best practice examples which should be shared and considered.**