



# Accessible Travel Policy

April 2024

**This policy document is part of our overall Accessible Travel Policy. It provides more detail into our policies around accessibility and our processes and plans.**

Other elements of our Accessible Travel Policy are:

- **Making rail accessible: helping older and disabled people** – a handy information leaflet
- **Train accessibility guide** – information on the accessibility of our trains, available on our website or as a separate document
- **Station accessibility guide** – a summary of the accessibility provision at all our stations, available on our website or as a separate document

You can download all of these from our website or they can be sent to you free of charge in alternative accessible formats from Customer Relations. There are several ways to contact Customer Relations:

<b>phone</b>	0333 311 0006
<b>next generation text</b>	18001 0333 311 0006
<b>website</b>	<a href="http://www.lnr.uk/contact-us">www.lnr.uk/contact-us</a>
<b>by post</b>	Freepost LONDON NORTHWESTERN RAILWAY CUSTOMER RELATIONS
<b>X</b>	@LNRailway
<b>Facebook</b>	@LondonNorthwesternRailway

## 1) Commitments to providing assistance

### a) Booking and providing assistance

If you book assistance in advance, we will arrange for station staff or a Senior Conductor to help you on and off the train at our stations. This will apply during the hours when trains are due to operate to and from our stations. These times are listed on the National Rail Enquiries website.

We try hard to make all journeys comfortable, safe and efficient, irrespective of your assistance needs. We participate in a system called Passenger Assist, the reservation system for customers who wish to book assistance. We make these reservations, free of charge, whether you are travelling on our services or those operated by other train companies on the National Rail network.

We are committed to maintaining and providing sufficient resources to, and continually improving performance of, the Passenger Assist system. We have a dedicated team to operate this booking service and these colleagues are trained in

the needs of disabled travellers.

We have a robust quality control system in place, including monthly review meetings, for us to share and discuss feedback from customers and staff. A long-term evaluation programme is in place, including anonymous surveys conducted by phone and email, which covers the booking process and journey experience.

This programme helps us to continually improve performance and to raise suggestions for continuous improvement, such as proposing alternative routes if a customer had concerns about using larger stations as a result of an invisible impairment (e.g. autism or anxiety). Most members of our Stakeholder Equality Group use Passenger Assist to travel with us and their feedback is invaluable (see page 39 for more information).

To book assistance for travel, including connecting trains in your journey (and seat reservations with other train companies) We advise you to contact us 2 hours before you travel.

To allow appropriate arrangements to be put in place, please contact us 48 hours in advance for international travel.

When you book assistance in advance, our Passenger Assist team checks the accessibility of your start and departure stations (along with any connection stations) on the National Rail Enquiries website to ensure you will be able to complete your journey. If accessibility levels are not suitable (e.g. there is no step free access at a station) they can arrange alternative accessible transport for you or, if you prefer, consider a different route. We can advise you on the best route to meet your needs e.g. a smaller interchange station which is less crowded or has fewer platforms.

Your booking confirmation (including reference number) will be sent to you by email, or by post on request.

When your train reaches its final destination, you will be assisted off the train within 5 minutes where we reasonably can. This will be explained to you when you book assistance and in the booking confirmation.

We have been actively involved in exploring technology to improve the customer experience of passenger assistance, including running the trials for a new network-wide app. We are excited about the opportunities that technology like this will offer in the near future. In the meantime, all stations on the network can contact our stations by phone to ensure someone is available to meet and assist you at your destination and any connections. We provide a dedicated phone line for each station (staffed at all times our trains are running) to co-ordinate the delivery of assistance and a person who is responsible for ensuring those calls are answered. When stations are not staffed, these calls will be handled by our control team who will ensure on board staff can carry out any assistance.

When assistance has not been booked in advance, we will still try to provide the support required whenever possible and with minimum delay. However, please be

aware that if assistance has not been booked there may be a short wait for staff to be available to assist you or to make arrangements.

We will provide clear and reasonable explanations for any such delay, for example needing to first assist passengers who have booked assistance or the Passenger Assist team needing to coordinate alternative accessible transport. If, in the future, we consider changing the staffing levels at our stations we will assess the risk of passengers not being able to access the assistance they need and, if necessary, implement measures to mitigate this risk. We will submit these assessments to the Office of Rail and Road (ORR) to review.

We have portable ramps that are fit for purpose on-board all our trains and at many of our stations to enable passengers (for example those using a wheelchair or those with mobility impairments) to get on or off the train, whether assistance has been booked in advance or not. Our staff are trained to know which ramps to use in which circumstances, and the local conditions for using the ramps safely to help you on and off the train.

As part of the booking process, the Passenger Assist team will notify you if any of the stations you plan to use on your journey will not be staffed. We will explain that our Senior Conductors can operate the ramp and/or assist you on or off the train.

We will ensure that, during the journey planning and booking process, the information about the accessibility of your journey will be made available to you. If we are unable to provide a member of staff to assist at a station that is unstaffed or only staffed part time, at the time of booking we will consider the best way to get you to your destination and this may mean we will need to make enquires and call you back with confirmation. If necessary, we may need to offer an alternative journey plan – this could be a different train route, the nearest accessible station or alternative accessible transport to get you (and companions if relevant) to your destination. This will be agreed with you and confirmed before travel.

By booking assisted travel in advance, to travel with us or another train company, we can help you make connections with other trains at our stations. As part of the booking process, we will check you have sufficient time to make any connecting train. We will help you when trains change platforms or announcements are made at short notice.

You can also refer to the stations pages on our website [Station accessibility information | LNR | London Northwestern Railway](#). In addition to the key information about stations (that you can also see on the National Rail Enquiries website [National Rail Enquiries](#) -) these pages will also provide supplementary photos and information to help you decide if that station is suitable for you to use.

At stations where we have staff in addition to those in working in the booking offices we can provide directions and, wherever possible, escort customers to a safe waiting place for connecting buses and/or taxis if the interchange is within the immediate station vicinity.

Where our train services connect with other modes of transport (such as buses, trams, London Underground or DLR) we will work with the operators of those services to provide, wherever possible, assistance which ensures a seamless onward journey for you. However, at London Euston station for example, assistance services are delivered by Network Rail (usually from train to concourse) so customers are advised to check their policy for further information. We will continue to work closely with Network Rail and other train operators to ensure that assistance is delivered consistently across our network.

We advise you to check the accessibility levels of onward connecting transport, particularly with local bus companies and community transport organisations.

Where taxi ranks or bus stops are provided at stations these are clearly signposted. We include, where possible, the contact details of local taxi operators on our station information posters which are displayed at each of our stations.

Private hire vehicle companies who apply to provide services from our stations are asked what proportion of their fleet is accessible and about the provision of driver disability awareness training. This information is influential in the award of contracts; however we are mindful that many ambulant disabled people would prefer to use standard vehicles due to their mobility needs. Where access is regulated under contract, from the earliest opportunity we will require the taxi operator to provide wheelchair accessible vehicles and ensure a reasonable number of drivers are trained in disability awareness. In the meantime, we will continue to explore opportunities to work collaboratively with other operators who serve our stations and in our group company to improve the last mile experience of our customers, including access to taxis.

We have a database of community transport providers and are working in partnership with them to facilitate access to rail. This provides us with the opportunity to access a wider range of vehicles which can be used as rail replacement in times of planned disruption. These vehicles may also be more suitable to convey scooters safely.

To enable you to make informed decisions and for us to arrange assistance that results in successful and fuss-free journeys, we are committed to providing accurate and clear information about our stations on National Rail Enquiries. This will include information on assisted travel, whether staff help is available (including staffing hours) and a step-free access note. To ensure consistency and, in turn, reliability, this note will include the following wording to clarify the step-free status by category:

- **Category A:** “This station has step-free access to all platforms / the platform”.
- **Category B:** “This station has a degree of step-free access to the platform, which may be in both directions or in one direction only – please check details”.
  - **Category B1:** “Step-free access to all platforms - may include long or steep ramps. Access between platforms may be via the street”.
  - **Category B2:** “Some step-free access to all platforms - please check details”.

- **Category C:** “This station does not have step-free access”.

**As part of the information on the National Rail Enquiries station pages, we will also clearly state:**

- Availability of station and on-board staff to assist passengers, including times. Scope of assistance will be clearly outlined e.g. if Senior Conductors can only assist a passenger get on or off the train, or if staff are available to help get around the station.
- Whether a platform ramp is available and confirming that this is always available when assistance has been booked.
- What to do on arrival at a station when you need assistance, including informing a member of staff at the ticket office that you will be waiting for assistance at a designated waiting space on the platform. We are currently trialling designated waiting spaces on platforms for passengers requiring assistance

As part of your booking for assistance, the Passenger Assist team can let you know if there are any issues which might affect your journey, e.g. a lift out of order. We put a note on the National Rail Enquiries station pages of these sorts of issues at our stations (which may be temporary) as soon as possible but no more than 24 hours after we know about them.

**Examples include:**

- Stations have a physical feature which might prevent some disabled people from using it
- Significant temporary work affects station accessibility
- Changes to stations make them temporarily inaccessible (for example, if station lifts or toilets are out of order)
- Changes are made to the accessibility of our trains which might affect disabled and older customers’ journeys

In addition to our Station Accessibility Guide / information on our website and the National Rail Enquiries station pages, we will endeavour to provide, where relevant, any additional details we have about our stations that may be beneficial to our older and disabled passengers.

This information will be provided on the station pages on both our websites. This information may include (but is not limited to) images of accessible features and information about the station or surrounding area, such as crowded areas or businesses where they may be able to visit for a safe space to wait.

If you need help with luggage within our station or station vicinity (e.g. station car park), to the platform and on and off the train please book assistance. The service is free of charge. If you haven’t booked assistance, we will do our best to help, subject

to staff availability. The weight, size and quantity of luggage must be safe for our members of staff to carry. Each piece of luggage cannot weigh more than 23kg. The National Rail Conditions of Travel state that, as a general rule, you may take up to three items of luggage onto the train.

Seats and wheelchair spaces cannot be reserved on our services, but staff will help you to find a seat or use an on-board wheelchair space. As wheelchair spaces on the train are limited and cannot be reserved, these positions are available on a first-come-first-served basis. During the process for booking assistance, we will explain to you that we cannot reserve you a seat or space.

We operate a Priority Seat Card scheme. Whilst this does not guarantee a seat, it is a tool for customers to use to show fellow passengers that they have a real need to sit down. This scheme is optional, and our staff will still help customers to find a seat whether or not they have a card.

We promote use of the JAM cards and Sunflower Lanyards. These schemes help people with non-visible impairments to indicate that they might need support from staff. We will be training our staff to look out for people using them at our stations and on our trains. For more information please visit [www.jamcard.org](http://www.jamcard.org) and [www.Hiddendisabilitiesstore.com](http://www.Hiddendisabilitiesstore.com). We welcome assistance dogs on our services. Staff assisting customers on-board a train will help ensure an assistance dog is comfortably and safely positioned (e.g. in the footwell of an empty adjacent seat).

## **b) Information provision**

**i)** Accessible Travel Policy documentation is made available in different formats. Our information leaflet, which forms part of our overall policy, is called 'Making Rail Accessible: Helping Older and Disabled Passengers'. Copies of this leaflet are available on our leaflet racks and ticket offices at staffed stations that our services call at. We routinely monitor supply levels and staff are reminded to check the racks.

The leaflet is also available on our website as a PDF (in a screen-reader compatible format). We commit to providing this in alternative formats (including audio) on request within 7 days. You can request copies - in a range of formats - by contacting Customer Relations (see page 2 for contact details).

We share our leaflets with prominent locations in the community. In addition to using our extensive stakeholder database, our Stakeholder Equality Group which includes representatives of customers with hidden impairments, give us strategic advice on identifying valuable 'community hubs' for sharing this leaflet and other messages.

This policy document is available on our website and free of charge by post or email within 7 days on request to Customer Relations.

At all our stations, there is a poster setting out useful information. This explains how to get a copy of our information leaflet and this policy document. The poster is

positioned to be accessible to wheelchair users.

## **ii) Stations and rolling stock**

We produce a station accessibility guide and a train accessibility guide to provide clear information about our facilities and services. You can access these via our website, or we can send these to you in other formats within 7 days on request.

We are also committed to providing accurate and clear information about our facilities at stations and on trains on the National Rail Enquiries website.

All front-line staff have access to a device (e.g. mobile phone) to be able to check the status of facilities for disabled and older customers via the National Rail Enquiries website. This means they can give up to date information on request.

## **iii) Passenger journey information**

Where systems are fitted, we provide clear and consistent audio and visual information on platforms and station entrances about train departures and arrivals, including during disruption. If audio announcements are not available, we have customer information Help Points which enable you to speak to a person to get information. On the train, announcements are made in time to give passengers the time to prepare to get off.

We continually review facilities at stations and will be identifying potential schemes for improving access to information at individual stations.

When you are travelling with more than one train company, we will let the next station know that you are making connections.

Where you have booked assistance in advance that, because of service disruption, is no longer suitable, our staff will seek to contact you if you provided a mobile telephone number or email address when booking. If necessary, we will arrange alternative accessible replacement transport that meets your needs or, if you prefer, rebook your journey.

We provide audio announcements on all trains, giving you information about any delays or changes to stopping patterns. We will provide clear audio and visual information to direct you to substitute transport where applicable. If you have booked assistance but have to travel on a different train to that on which you were originally booked due to service disruption, we will contact the terminating or interchange station staff to ensure that they are ready to assist you on arrival. If a train terminates en-route, then our on-board colleagues will contact the station or operation control and advise them you require assistance. Our staff are trained and briefed on the importance of providing timely and accurate information and additional support that our older and disabled customers may need during times of disruption.

Our staff (including cleaning staff) are vigilant to any facilities being out of order, e.g. an accessible toilet. However, if you spot a problem please let us know so we can fix it as soon as possible and warn customers who might be relying on them. There are many ways to do this:

- Tell a member of staff in person
- Contact Customer Relations (including social media) – see page 2

When key accessibility facilities are out of order (e.g. accessible toilets or lifts) we put an alert on the station page of the National Rail Enquiries website. If we know the repair or works timescale, we will share this on the page. Our Passenger Assist team can see these alerts and discuss this with you as part of a booking for assistance. Our Customer Relations team also have access to this information to respond to enquiries. We will also put up notices at the station as appropriate.

To ensure the information and alerts we share about accessibility are clear and reliable, we perform an annual review of our language and tone of voice.

#### **iv) Information points, help points and contact centres**

Where we have staff available at a station, whether within a ticket office, at a gateline, or on the platforms they will be able to give you all the information you need e.g. service updates, accessibility of our stations, contact details for Passenger Assist etc. At stations which are unstaffed you can speak to a person via a Help Point (usually located on the platform).

At our busiest stations (or quieter stations with high levels of customers needing passenger assistance) we have clearly marked information points which offer timetables, posters and information leaflets at heights which are suitable for wheelchair users and standing passengers. We will make information on the facilities, services and accessibility of all stations (as well as information on timetables, fares and connections) available at station ticket offices, over the telephone from our Passenger Assist team and on our website as well as the National Rail Enquiries website. Our stations pages of our website provide additional information and images to help you make informed decisions.

Wherever possible, leaflet racks and timetable displays will be placed so that wheelchair users and standing customers can use them. We have issued devices to all front-line staff (including those who work at our customer service points) so that they are able to provide accurate, up to date information to customers e.g. on delays and diversions. This also includes access to details about our services and those of other operators, accessibility of other transport available near the station and direct customers to appropriate sources of further information.

#### **Meeting Points**

Where you have booked assistance for a journey at a staffed station (unless agreed otherwise in your booking) please approach the ticket office to let us know you have arrived. At stations which do not have staff on duty, please wait on the

platform in time for your train and our Senior Conductor will assist you on board.

If a station is not staffed, we always provide a way for you to speak to someone at times when our trains are running. Our station information posters display the freephone Passenger Assist number (who can provide service information) and the next nearest staffed station, as well as detail of local businesses near to the station that can provide additional facilities as and when they become available. You can also use a Help Point located on the platform. The textphone or Next generation Text number is also clearly displayed.

We are currently trialling designated waiting spaces on platforms for passengers requiring assistance at a few of our stations. This is to further facilitate passengers and staff in identifying when assistance is required. These waiting spaces are to be used when passengers have pre-booked assistance and have let the staff at the station know that they will be waiting on the platform to be assisted. At unstaffed stations, the on-board staff will identify when a passenger is waiting in a designated space to be assisted.

## **v) Websites**

We achieved Web Content Accessibility Guidelines (WCAG) standards for our website by 31 December 2021.

We will also liaise with our Stakeholder Equality Group to gain feedback on their experience of using our websites.

Our website is designed to work with screen readers, magnifiers and in-browser accessibility functions. A dedicated page on our website provides further information and guidance on assisted travel.

For consistency, we use the term 'Passenger Assist' to refer to the booking system for assistance and visitors to our website can access the dedicated page by a link from our homepage.

Our Accessible Travel webpage is a great source of valuable information if you have access needs. This will always include:

- A concise explanation of the Passenger Assist service in plain English
- Contact information to book Passenger Assist services (including freephone and Next generation Text numbers)
- How to book tickets (including availability of discounts and railcards)
- Links to up-to-date train and station accessibility information documents
- Links to information on temporary reductions in accessibility and delays or disruptions
- Advice on any restrictions on the size of wheelchairs, scooters and mobility aids we can carry

- How to access any initiatives we operate e.g. Travel Support Cards, Priority Seat Cards, JAM cards and sunflower lanyards
- How to access ‘Making Rail Accessible: Helping Older and Disabled Passengers’ leaflet (including link to download the pdf) and how to request this in different formats
- How to give feedback, make a complaint or details for availability of compensation when booked assistance has not been given
- Links across to the stations pages where you can find further detailed information on station facilities and public transport provision

### **c) Ticketing and fares**

We expect all customers to have a valid ticket or pass to travel before starting their journey. However, if for reasons of inaccessibility you are unable to buy a ticket at the station before your journey, you will be able to purchase a ticket either on the train or upon arrival at your destination without penalty and with any eligible discount applied.

Our ticket machines at stations are able to issue discounted tickets to holders of a Disabled Persons Railcard and a companion.

Ticket gates can impact on accessibility so, wherever possible, staff will be positioned nearby and can provide assistance. At least one wider gate is provided for wheelchair users, disabled customers, pushchairs etc. When a station is unstaffed or staff are not in attendance, gates are locked open.

When purchasing tickets in advance (whether online, by phone or ticket office) we will warn customers if they would not otherwise be able to use the ticket for accessibility reasons which we should reasonably be aware of e.g. a wheelchair user attempting to buy First Class tickets when we do not have a First Class wheelchair space. We cannot control the practices or advice given by third party retailers so, if you have needs, we advise you to contact us directly.

### **d) Alternative accessible transport**

We aim for all our customers to travel by rail but recognise that sometimes this may not be possible. In these cases we will coordinate alternative accessible transport for you at no extra cost to your ticket.

We will continue to work closely with our alternative transport suppliers to ensure that they are contracted to provide accessible vehicles whenever possible. This will include reviewing our list of suppliers on a regular basis and utilising service buses instead of coaches for shorter journeys where possible. In addition, we will also

be encouraging operators to invest in service buses fitted with tachographs and seatbelts, allowing them to work on longer distance routes.

We will also continue to support our suppliers by providing them up-to-date information on the latest regulations for vehicle accessibility, as well as information about potential retrofits they may be able to undertake to improve the accessibility of their existing vehicles.

Where disruption is planned in advance, we will endeavour to use Public Service Vehicle Accessibility Regulation (PSVAR) compliant rail replacement transport for the services affected to meet the needs of passengers. We will review our contracts with rail replacement suppliers on an annual basis to ensure they can continue to provide the required supply of accessible vehicles for us.

Where services are delayed or disrupted without advance warning, information on any changes, including the use of alternative transport and its accessibility, will be disseminated via the same channels. At staffed stations, information will be provided to staff, and at unstaffed stations, you can use the station help points, our website or social media channels to get further information.

If you encounter an issue on your journey you can report this either to station staff, staff on the train or by contact our Customer Relations Team by phone, web form or social media.

On an individual case basis, we will consider:

- The customer's assistance needs
- The journey times involved
- The accessibility of trains and stations, including staffing levels
- The potential for staff from other locations to be deployed

We will offer an option, where reasonably practicable, that is most similar to the service provided to customers not requiring assistance. However, we will be led by your individual needs.

Alternative accessible transport (e.g. a taxi suitable for your needs) will be offered when a station is not physically accessible to you. Please see below regarding rail replacement services in cases of planned or unplanned disruption.

## **e) Scooters and mobility aids**

We can carry wheelchairs (manual or powered), scooters and mobility aids up to a certain size. The reasons for these restrictions are due to maximum safe loading weights of the ramps, the width of on-board doorways and to meet turning circle needs inside the carriage and on the platform.

The maximum size dimensions are:

- 700mm by 1200mm
- 300kg (combined weight of passenger and wheelchair/scooter)

If a scooter or wheelchair is particularly large, staff may discreetly ask you to confirm the dimensions to ensure your safety on our services. You need to check these dimensions before travelling and are advised to contact your wheelchair or scooter provider for this information. For safety reasons, our staff need to decline support in individual cases where he/she is not physically able to provide the assistance needed but we will always do our utmost to support you with your journey.

Scooters which are foldable or can be dismantled to meet these dimensions, can be folded and carried on as luggage by you or a companion. Scooter users may travel in the scooter and are not required to transfer to a seat.

Please see below for arrangements regarding scooters in times of disruption.

## **f) Delays, disruption and emergencies**

We recognise that disruption to facilities and services can have a significant impact on rail services to disabled people and on confidence levels of those travelling with us. We will therefore do everything we can to ensure disabled and older customers are able to continue their journey and are safe and comfortable.

Where alternative transport is being provided due to planned disruption, such as improvement works, we will include information on the accessibility of this transport in our communications. This will include (but is not limited to) social media posts, associated webpages on our website, press releases and station posters or leaflets. Where appropriate, we will also endeavour to include such information in station announcements.

Any passengers who books assistance during a period of planned disruption will be informed about any alternative arrangements, including the accessibility of such transport, at the time of booking. Any passengers who make a Passenger Assist booking before planned disruption information becomes available will be contacted at the earliest opportunity to discuss their arrangements.

For changes to station facilities at stations or on trains:

- We update the station pages of National Rail Enquiries website with issues affecting accessibility features of stations (e.g. out of order accessible toilets and lifts) to enable you to make informed decisions.
- We will warn you before assisting you on-board if the accessible toilet is out of order, giving you the option to wait for the next service or continue your journey if you prefer.

- If there are station staff available, we will help you make connections when trains change platforms or announcements are made at short notice.

Sometimes we need to provide rail replacement services e.g. during planned or emergency engineering works. We rely on a range of vehicles for this e.g. bus, coach, minibus, accessible and standard taxis. We understand that you may have access needs which can only be met by certain vehicles. We will discuss these needs with you in the event of rail replacement.

If rail best suits your access needs and there is a similar route operated by another train company which will get you to your destination, we will do our very best to get you on that service as a first option. During disruption we will ask other train (and sometime bus) operators to accept our tickets. However this will depend on how busy their trains are at the time and the specific routes affected. We will try to provide a solution that works for you.

Where you have booked assistance in advance that, because of service disruption, is no longer suitable, our staff will seek to contact you if you provided a mobile telephone number or email address when booking. If necessary, we will arrange alternative accessible replacement transport that meets your needs or, if you prefer, rebook your journey.

We will always do our best to help in times of disruption even if we have no advance warning. If you are already part way through your journey when disruption occurs (e.g. the train terminates early) the Senior Conductor will arrange alternative accessible transport if necessary or coordinate the assistance for your delayed or altered journey.

If you are a scooter user, we will source alternative transport based on individual considerations e.g.:

- An accessible taxi which can safely transport the scooter in one piece
- An accessible or standard taxi for scooters which can fold or be carried in components
- A community transport minibus

If your scooter cannot be transported on buses or taxis (e.g. due to manufacturer's guidance) and/or you are not comfortable with this option, we will explore alternatives with you, such as:

- Supporting you to travel home and leaving your scooter at the station in a safe and secure place overnight
- Escorting you to a local business to wait in a warm and safe place until you can continue your journey by rail once the disruption passes.
- We will provide replacement facilities, where reasonable, when accessibility levels are compromised e.g. if access to station toilets is blocked off for several weeks we would look to hire portable toilets.

All our staff are trained in the procedures to be adopted in the event of an emergency on-board a train or at a station. Our policy is not to evacuate customers with mobility impairments or wheelchair users without appropriate support from the emergency services unless it is a life-threatening situation. You will never be left on your own.

## **g) Station facilities**

### **i) Left luggage**

We do not provide left luggage facilities at any of the stations we operate. If this is introduced, we will ensure the design accommodates our disabled and older customers including various heights, sizes and appropriate opening mechanisms for people who experience a range of access barriers. There are left luggage facilities at London Euston, Liverpool Lime Street and Birmingham New Street (operated by Network Rail).

### **ii) Disabled parking**

Where we have car parks at our stations, we offer free car parking to Blue Badge holders. If a designated parking space is unavailable, Blue Badge holders may park free of charge in any other non-restricted parking space in the car park. The availability of car parking is shown on our Station Accessibility Guide. We use all reasonable endeavours to comply with the Department for Transport's (DfT) Code of Practice requirements in relation to the number of Blue Badge parking bays where practicable. Passengers can also register for Saba's Blue Badge portal [www.sabaparking.co.uk/blue-badge-portal](http://www.sabaparking.co.uk/blue-badge-portal) for an annual e-permit to be used at any of our station car parks managed by Saba. Passengers must continue to display their physical Blue Badge permit at all times when parking at any station car park.

### **iii) Third party provided facilities**

Where third parties provide facilities at our stations, for example retailers and coffee kiosks, we will ensure that the contracts we issue to them will include the requirement to comply with their duties under the Equality Act 2010. We will ensure that the location of these facilities does not impact on the accessibility of the station or other facilities.

### **iv) Replacement facilities**

We will provide replacement facilities, where reasonable, when accessibility levels are compromised e.g. if access to station toilets is blocked off for several weeks, we would look to hire portable toilets.

## **v) Station entrances**

We will not permanently close station entrances or gates if it would lead to a reduction in accessibility for disabled customers to any platform or facility at the station unless we have consulted with DfT, Transport Focus or London TravelWatch, our Stakeholder Equality Group and local access groups and received the approval of the DfT. We will also consider the impact on disabled customers if we need to restrict or temporarily close an access point during building works. We would apply to the DfT for permission to close an entrance or gate permanently.

## **h) Redress**

If you book assistance to travel on one our trains and it is not provided or has failed in some way, we will fully investigate what happened and will provide appropriate redress to you. Your complaints are dealt with on their individual merit and compensation can therefore vary depending on the nature and extent of the assistance failure.

For example, it might be appropriate to consider a full or partial refund of your travel fare or to offer you a complimentary ticket where no ticket was purchased. In addition, we recognise that in some cases your main priority might be to know that action has been put in place to stop failures happening again, e.g. enhancing the content of our staff training programmes. Our Accessibility Manager works closely with the team who investigate failed assistance and complaints relating to accessibility to consider whether process changes or training updates are needed. Any particularly emerging themes are raised with the Stakeholder Equality Group to consider what effective changes or initiatives can be put in place.

Any compensation will be in addition to your entitlement to Delay Repay (see our Passengers' Charter for further details). In our response, we will explain why the assistance was not provided and what steps we have taken to ensure it does not happen again.

We tell passengers how to let us know when their assistance fails - on our website, via social media and in our leaflet 'Making Rail Accessible: Helping Older and Disabled Passengers'. Staff can also provide the contact details of Customer Relations in person on request.

We aim to investigate and respond to your complaint within 10 working days. If you are dissatisfied with the response, contact us again and the complaint will be referred to a senior person who has not previously been involved in the case. They will respond within 10 working days. We do everything possible to deliver a high standard of service but if you are unhappy with the response you receive you have the right to appeal to the Rail Ombudsman.

To be clear, we are responsible for any complaint or claim for redress about failed assistance if you travelled, or were supposed to travel, on one our trains.

If you travelled (or were due to travel) with one or more train company, you only

need to make a single complaint or claim. If there were multiple assistance failures in one journey travelling with different train companies, we will coordinate a single response from us all. However, if one company managed the bulk of the assistance, we may refer the claim to that company so that they may respond to you directly. We will ask you for permission to pass on your claim before we do this.

Nothing in this policy affects our statutory duties, including the Consumer Rights Act 2015, the Equality Act 2010 or the EC1371/2007.

## 2) Strategy and Management

### Our commitments

We are committed to ensuring that needs of disabled and older people (and indeed everyone with access and inclusion needs under the Equality Act) is understood and embedded in the way we do our business, both internally and externally.

#### In this section we outline how we make sure that:

- We embed provision of services to disabled and older customers (and people protected under the Equality Act) within our business and project planning and delivery.
- We adopt a culture of continuous improvement to enhance access to the railway for disabled people and those with access needs, including physical, operational, and behavioural measures.
- Our staff and contractors have the resources, skills, and confidence to deliver assistance to passengers and our wider customer base.

We measure the success of our Accessible Travel Policy – not just in numbers but also how people feel about our approach to service delivery.

### a) Strategy

West Midlands Trains is responsible for running both the West Midlands Railway and the London Northwestern Railway services. West Midlands Trains is part of the Transport UK Group which also operates East Midlands Railway, Greater Anglia, and Merseyrail train services, as well as bus services in London.

We also have our own behaviour codes and messaging that we promote across staff at West Midlands Trains. Under the headings of 'Real, Proud, Open and Simple' we aim to demonstrate positive, inclusive behaviours at all times, reinforced through our own Equality, Diversity, and Inclusion strategy. This strategy includes the principles of FREDIE (Fairness, Respect, Equality, Diversity, Inclusion and Engagement).

West Midlands Trains has now achieved Stage 2 Investors in Diversity status and is working towards being reaccredited. We have now also achieved Disability Confident Employer status. Disability Confident is a government scheme designed to encourage employers to recruit and retain disabled people and those with health conditions by:

- Challenging attitudes towards disability
- Increasing understanding of disability
- Removing barriers to disabled people and those with long-term health conditions
- Ensuring that disabled people have the opportunities to fulfil their potential and realise their aspirations.
- Improving employee morale and commitment by demonstrating that all employees are treated fairly.

From the first day of operations, we secured an accessibility specialist to advise at the early planning stages of our projects and obligations as a reflection of our commitment to inclusion. We recruited a full-time Accessibility Manager in the first year of operations who is responsible for the external facing accessibility issues that impact on our customers. This role works very closely with our internal Equality and Diversity expert within HR.

Our overall accessibility strategy is driven through a series of committed obligations that, when linked together, provide a significant uplift in the quality and standard of provision for disabled and older customers. This includes a great commitment to investment. Flagship schemes include:

- New fleets of trains and enhancements to existing trains
- New accessible stations, working with the West Midlands Rail Executive and other transport authorities.
- Provision of new lift schemes at key stations on the network, through Network Rail's Access for All programme, including Lichfield Trent Valley, Tring, Kings Langley, and replacement of the lifts at Watford Junction.
- Provision of over £400,000 minor works improvements every year, including handrails, steps, and tactile guidance paving.
- Development of local community improvement schemes at stations, with access and inclusion playing a key part in the decision making on the bids we receive into our Customer and Community Improvement Fund each year.
- Delivery of front-line customer service training, of which equality and inclusion forms a key component.
- Development of community transport solutions, making more use of accessible minibuses and taxis, and voluntary car schemes, to help people access their local stations.

For more information about these initiatives, customers can contact the Accessibility Management team by email on [accessibility@wmtrains.co.uk](mailto:accessibility@wmtrains.co.uk).

## **Our implementation priorities for 2024**

During 2023 there will be a number of projects 'going live' which will have a direct or indirect impact on accessibility. The projects are not limited purely to physical improvements on the network but also operational and behavioural measures that will also have a positive impact. Examples include:

- Rolling out new trains on our network
- Ongoing promotion of partner schemes to assist older and disabled passengers, including the Assistance Dog Card Scheme, the Hidden Disability Sunflower Lanyard Scheme and other localised initiatives (e.g. Baby on Board and priority cards)
- Ongoing support for the Dementia Friends initiative within our staff
- Continued roll out of customer service training for front line staff and wider equality, diversity and inclusion training for managers and directors
- Achieving Investors in Diversity Stage 2 accreditation
- Maintaining Disability Confident accreditation
- Accessible planters at stations to enable disabled and older people to access gardening activities
- Support the wider industry with the roll out of the Passenger

### **Assist App**

- Publish our Passenger Assist statistics on our websites
- Ensure staff continue to be trained and supported in the use of Equality Impact Assessments alongside our wider accessibility training
- Ongoing development and availability of customer information in accessible formats – at stations, on trains and digital media.
- The opportunity to gain Inclusive Transport Leaders Scheme accreditation.
- Ensuring accessibility audit data is kept up to date so that customers know what facilities and services are available to them on their journeys

## **b) Management arrangements**

The management arrangements are designed to ensure that positive approaches to meeting the needs of disabled passengers are an integral part of our business activities.

Our Accessible Travel Policy (ATP) is approved by our Board of Directors and endorsed and fully supported by the Managing Director and Executive Management team.

The Customer Experience Director has executive responsibility for our ATP and ensures that it is integrated into business plans and incorporated at the planning stage of all major projects through the early involvement of the Accessibility Manager and proper use of the Equality and Diversity Impact assessment process. The Customer Experience Director also ensures that the requirements of disabled people are represented and that briefings are cascaded throughout the business as appropriate. Our management teams are responsible for the implementation and delivery of the day-to-day elements of customer service, including this policy.

All our directors, managers, and staff, including new entrants, who deal with passengers, receive appropriate disability equality training commensurate with the role they play in supporting passengers directly or developing accessibility in the organisation.

For example, our executive team has received bespoke disability equality training by an expert with lived experience of disability and the session explored the commercial benefits of accessibility as well as the consumer expectations of disabled people. As part of the course, the directors also shadowed disabled and older customers on train journeys to observe barriers and staff protocols first-hand. Staff and managers that design or manage the upgrade and modification of our facilities and services also receive appropriate training, including bespoke sessions for property and project management teams that explore how to effectively perform equality impact assessments.

### **Our Accessibility Manager is responsible for:**

- Leading engagement on accessibility issues
- Managing our Stakeholder Equality Group
- Influencing and developing the design of stations, trains, and other projects
- Developing and implementing project-based Equality and Diversity Impact Assessments for both physical and operational initiatives
- Identifying and agreeing spending priorities
- Managing integrated transport products and services
- Representing access and inclusion issues within the organisation
- Developing door-to-door products and services
- Leading on our station travel plan programme, which looks at access and integration on a station-by-station basis.
- Facilitating improvements in accessibility measures, including working with local

authorities and other partners that deliver 'last mile' provision to our stations, and preparing strategic funding bids.

- Developing training
- Ensuring access and integration is properly embedded into all our key events, including our stakeholder conference.
- Working collaboratively with other train operating companies, local authorities, West Midlands Rail Executive, Transport for London and other strategic partners.

Our plans and aspirations for access and inclusion include realistic budgets and resources to secure their success. Systems are in place for reviewing return on investment, to include financial and social factors. Planned investment in station facilities, technology, and passenger assistance services, for example, are expected to deliver return on investment by increasing journeys made by existing and new types of passengers. All projects must have evaluation mechanisms built-in from the outset and so this is under constant review. All these plans and processes are subject to rigorous Equality and Diversity Impact assessments which are either led or scrutinised by the Accessibility Manager.

### **c) Monitoring and evaluation**

Monitoring and evaluating our performance in delivering services and facilities to all passengers, including disabled passengers - and then acting upon what we learn - is key to our commitment to a cycle of continuous improvement.

Our Stakeholder Equality Group (SEG) is our critical friend and a source of new ideas and innovation. The group not only scrutinise our plans but are also empowered to tell us what we can do differently. See page 39 for more information about the group. We review achievements and opportunities at the end of each programme year at the SEG meeting.

Members of the SEG give individual feedback on their journeys and overall customer experience throughout the year, and therefore provide informal 'mystery shopper' feedback.

Our approach to monitoring and evaluation is to measure services and facilities on a regular basis throughout the year to provide accurate information regarding the quality of the current services and facilities and to identify gaps for improvement in future years. For example, as part of our customer satisfaction survey measurement tool we contact 10% of Passenger Assist users to evaluate the extent that the service met their expectations.

We collect data on the number of Passenger Assist bookings and 'turn up and go' requests we receive, deliver, and fail to deliver (along with reasons). Every month we share this with the Office of Rail and Road (ORR) for them to monitor our performance. As part of our annual review, we also report to the ORR with details of key actions we have identified to improve our performance.

Every monthly rail period we review the feedback from our own stations' staff about booked and 'turn up and go' assistance which have failed or not gone according to plan. Whilst these cases are low in number, analysing these is part of our ongoing improvement plan.

We also review the customer feedback from our Customer Relations team relating to accessible travel and use periodic reviews of this feedback to work with our Customer Experience team to target routes, locations and services that need attention.

Our station travel plan programme includes a detailed customer survey for each station. This involves key recommendations for improving access and inclusion in an action plan. Every station travel plan will be developed in close consultation with stakeholders and, as part the process, a workshop will be held which will include representation from local disability groups and other organisations representing the needs of older people and those with other inclusion barriers.

We will also take any key findings from our web based 'Always Listening' survey to look at ways to improve the service we offer to disabled and older customers.

We have established a process where any significant complaint or improvement suggestion is referred to the Accessibility Manager who speaks to the customer or his/her representative personally. This enables us to address any specific concern swiftly. In some cases, the customer has joined our SEG as a full or corresponding member to continue giving helpful feedback.

The service quality regime involves inspecting 60 stations and 160 vehicles in every four-week period. This means every station and every vehicle will be inspected at least four times a year on top of any qualitative feedback we receive through the channels above.

We also obtain first-hand insight from staff about ideas for improving the way in which they support passengers, particularly those with non-visible impairments.

We do this through regular internal communications to our staff on accessibility issues and encourage staff to feed any comments or suggestions back directly. We will also be collating feedback in response to our new accessibility training, which will encourage our staff to consider the experience of passengers with a range of impairments.

## **d) Access Improvements**

### **Trains**

We are committed to complying with Technical Specification for Interoperability for Persons with Reduced Mobility (PRM-TSI) to ensure our trains meet accessibility standards. Over the course of the franchise, we are investing in brand new trains and to refurbishing our older, less accessible trains.

## **Stations**

When we install or refurbish our stations, we are committed to adhering to the Joint Code of Practice and other industry standards. We also undertake a rigorous Equality and Diversity Impact Assessment (EqIA) that takes account of both the positive and potentially negative impacts of the project. The EqIA process reflects on not just the physical design and mitigations needed but also how the finished project will operate and what this means for each of the protected characteristics (under the Equality Act 2010).

### **Access to and from stations**

We are committed to using the Station Travel Planning process (which we call the 'Stations as Places' programme) to assess the barriers to using the rail industry beyond the station environment.

Customers need to make informed choices about how to travel. We understand that people with access needs have additional considerations when planning door-to-door travel.

As part of our Stations as Places programme, we have audited each station that we operate from an accessibility viewpoint, enabling the evidence to be used to help prioritise station improvements, minor access works and influence more significant projects such as station rebuilds and nominations for DfT's Access for All bids. These audits have also looked at the level of access from the station entrance of the forecourt across to bus stops, tram stops and transport.

We will be working in partnership with other train operating companies that run stations where our trains stop and agreeing to carry out similar assessments at these locations.

In addition, as part of over 90 detailed Station Travel Plans we have audited the quality and customer experience in using cycle paths and the wider pedestrian network, targeting key routes leading to hospitals, schools, tourist attractions and town centres.

We will use this evidence to develop access solutions with local councils and other stakeholders and generate third party funding through wider partnership working with planning and highway authorities and developers.

The customer evidence collected from the Stations as Places survey will also be used to help negotiate adjusted or new bus services, potentially using taxi and community transport providers.

### **e) Working with disabled passengers, local communities and local authorities**

We are committed to the continuous improvement of services and facilities for disabled people and recognise that everyone will benefit from a truly accessible railway. A key aspect is listening to and working with customers with access needs to ensure that the plans set out on page 30 reflect our customers' priorities and are

not based on assumptions.

To that end, we established our Stakeholder Equality Group (SEG) significantly ahead of the franchise schedule to ensure consultation was embedded in our work from the outset. The SEG represents customers who experience a wide range of access barriers, including non-visible impairments, and other social factors such as age, gender, and ethnicity.

The SEG has its own detailed terms of reference and now has over 40 members. The group is comprised of:

- Customers with lived experience of access barriers, predominantly through disability, but also for wider social and economic factors under the Equality Act 2010
- Organisations that represent the people with access needs including invisible impairments
- Individual customers that have offered to give their time and input covering a particular area of interest
- Key members of staff that are present to help, listen and take suggestions into their own work areas
- Other stakeholders including West Midlands Rail Executive and other train operators

The Accessibility Manager is responsible for the SEG, who has a link to both the Head of Corporate Affairs and the Customer Experience Director for wider support and development of initiatives across the business.

Around 20 people attend each meeting. Through the network of skills and customer insight present we set up 'task and finish' groups to focus on specific projects and consultations, ranging from station audits to input on new trains, ideas for training content and responding to national rail policy direction on inclusion.

Although the SEG is a business plan commitment, we have expanded its reach beyond the core aims originally laid out to try and achieve the depth and breadth of customer insight needed across such a diverse network.

### **The main aims of our SEG are to:**

- Offer ideas and advice and provide constructive feedback on proposals, challenges and experiences;
- Review our progress on all accessibility matters, including meeting the needs of disabled people and other passengers with accessibility requirements;
- Consult with stakeholders on how to improve accessibility and provide regular access audits;
- Use the feedback gathered through call back surveys to agree performance

targets for Passenger Assist in relation to reliability, punctuality, quality and professionalism of the service;

- Provide advice on policy, schemes, initiatives and approaches adopted by us to optimise the benefits of access for all in the spirit of the Equality Act 2010 and the requirements of the Public Sector Equality Duty; and
- Work seamlessly with our wider equality, diversity and inclusion aims and activities.

We actively promote the availability of the Passenger Assist service. One tool for this is our Travel Support Cards which display our contact details for station staff and Senior Conductors to distribute at their discretion when interacting with customers.

Another key tool for this is our leaflet “Making Rail Accessible: Helping Older and Disabled Passengers”. We display this at our staffed stations, on our website and promote the service by social media. Our members have valuable community links and this helps us share the leaflet and promote the message in places of influence.

For example, Just a Minute (JAM) cards allow disabled customers to control when and to whom they flag that they need more time or support for their journey via a series of prompt cards. The initiative is particularly valuable to people with hidden impairments such as learning difficulties and autism. JAM cards had already been adopted by Avanti West Coast and, through consultation with our Stakeholder Equality Group, we identified firm support to adopt this tool on our network.

Another example of joined-up working to test ideas and tackle barriers is the Calm Room at Crewe station. This provides a quiet dementia and autism friendly space within the busy station environment. Whilst Crewe station is not one which we manage, we were keen to support this pilot initiative by providing funding and to learn from the outcomes. As a result of the positive outcomes of this initiative, we plan to introduce some calm/dementia-friendly rooms at our own stations.

In addition to working with other train operators, we work closely with Network Rail to share best practice, for example building on Network Rail’s diversity impact assessments with workshops for our property and project management teams. We have also worked jointly on a project with Network Rail to install British Sign Language screens at Birmingham New Street station.

Following a year long partnership with Alzheimer’s Society, we are striving to make our railway more dementia friendly. This includes supporting the charity to educate our frontline staff on best practice, encouraging all staff to become Dementia Friends and recruiting Dementia Friends Champions in different regions and roles around the network.

We provide an annual report to the Office of Rail and Road on our work with disabled passengers and local communities on our activities, collaborative working and the outputs of these.

## **f) Staff training**

Our colleagues have a clear passion for delivering exceptional customer service – whether that is helping someone plan their journey or sitting with someone who is experiencing distress. We recognise that training is essential to protect and enhance the customer experience of disabled and older customers.

We are in the process of reviewing our existing training portfolio to include access, equality and inclusion matters that align with the Office of Rail and Road (ORR) training outcomes. We are also examining ways to tackle specific learning objectives for key staff in niche areas and are adopting a blended learning approach to positively reinforce equality considerations. This way the programme embeds the training outcomes required by the Office of Rail and Road. This will be developed with support of our Stakeholder Equality Group and customers with lived experience of access barriers, as well as paying attention to any changes in operational standards that need to be communicated.

As of January 2024, 99% of both our customer-facing and management colleagues had completed our Accessibility Matters training programme. This covered the following themes:

- Understanding disabled people's everyday challenges
- Equality legislation
- Defining disability
- Recognising passengers who need assistance
- Railway Regulatory Framework

In addition, training for all frontline staff who deliver Passenger Assist services will also cover communication, accessibility at stations and providing safe assistance.

In developing our new accessibility training programme, we will explore a blend of delivery channels, including classroom (or virtual classroom) sessions, e-learning, on-the-job learning, and information through internal communications channels. We are committed to ensuring that this training goes beyond the classroom, and helps promote a culture of inclusivity, placing accessibility at the heart of our customer service.

Refresher training for staff will be implemented every 2 years, with particular focus on frontline staff who provide assistance and will evolve to reflect customer expectations and operational changes. This will be a blended learning approach, using face-to-face and online training. Refresher training provides the opportunity to raise 'hot topics' highlighted to us by the disabled community and respond trends in customer experience data by targeting specific themes.

We understand that agency and temporary staff may have a direct impact on our

customers' experience, so as part of our new accessibility training programme, we will be working to ensure that these staff receive appropriate customer service training. We will ensure this through our contracts with third parties and will be reporting on our progress with training to the Office for Rail and Road on an ongoing basis.

We commission a specialist provider to source taxis for us when alternative transport is needed, particularly for disabled and older customers. We do not provide those taxi companies with training as, given the geographic area our network covers, this is not practicable, but we emphasise the importance of this in our procurement processes and our ongoing service monitoring.

Part of our taxi brokerage process is assessing the extent to which drivers receive training e.g. through the local licensing authority. If any driver operates offensive, unsafe or discriminatory practices towards a customer, we would take appropriate action, which may include organising training or not using the driver again. We have a zero-tolerance policy against any taxi driver who refuses an assistance dog.

### **In the meantime:**

- Accessibility and inclusion is included in our existing induction programme
- The programme is delivered to any staff who deal directly and indirectly with customers with a range of impairments
- All statistics, legislation and language in our training modules used is up to date
- All frontline staff who assist passengers receive appropriate training in equipment e.g. ramps and wheelchairs
- Staff who answer telephones are trained in communicating effectively with people who experience communication barriers

### **Who to talk to?**

For any enquiries concerning the content of our Accessible Travel Policy, including our strategy and consultation, please contact:

Accessibility Manager  
West Midlands Trains  
134 Edmund Street Birmingham  
B3 2ES  
email: [\*\*accessibility@wmtrains.co.uk\*\*](mailto:accessibility@wmtrains.co.uk)