Accessible Travel Policy Implementation

Review of unbooked assistance and Help Points

RiDC

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Executive summary

Background

The purpose of the research was to generate a 'compliance baseline' for station operators on selected aspects of the Office of Rail and Road's (ORR) Accessible Travel Policy (ATP) Guidance, Passenger Information, and delay compensation regulatory obligations.

ORR wanted to understand how policies are implemented in the real world and the impact on disabled rail passengers. A sample of accessible stations across all licensed station operators in Great Britain was created.

Methodology

The Research Institute for Disabled Consumers (RiDC) recruited members from its pan-disability consumer panel to conduct 147 'mystery shop' audits at 68 staffed stations and 79 unstaffed/partially staffed stations (in some cases, auditors were accompanied by their carer or personal assistant). The selected stations were managed by 21 different Train Operating Companies (TOCs). RiDC recruited auditors with a range of disabilities who were willing to travel by train and lived close to an accessible staffed or unstaffed/partially staffed station. Once recruited, the auditors were fully briefed on the audit requirements, their assigned journey and what do to if the journey failed. Auditors were instructed that they did not have to complete a 'full audit' of all the facilities or platforms at a station. Instead, they were asked to simply take notice of certain facilities and signage as they made a 'usual' journey through the station. As such, there is an unavoidable element of subjectivity in the findings of this exercise, where features may have been present but were not noticed.

Context

This was a complex and logistically challenging project. As a result of COVID-19 restrictions, the project was paused in early March 2020 (the project started in mid-February 2020 with the expectation that it would be completed by April 2020) and eventually restarted in late September 2021. Fieldwork was completed in mid-

November 2021. The full number of audits (147) that were originally planned were completed despite the substantial break in the fieldwork. However, COVID-19 restrictions and the imposed gap in the research had an obvious effect on this project. Where the impact of changes to policy and practice due to COVID-19 restrictions could have affected the findings, we have highlighted this.

The most complicated aspect of the entire project related to the request for assistance from a Help Point. There were several external factors that we could not control (assistance from staff at partially staffed stations or assistance from the public) when the auditors tried to use the Help Point. We have tried to include, throughout the report, an accurate reflection of what happened during the audits of unstaffed/partially staffed stations in relation to requests for assistance.

Finally, the relative size of the overall sample and the requirements of the audits (such as finding accessible stations/journeys convenient to the auditor) and certain obligations in the ATP, meant that in some cases response rates were low. Where this is the case, we have noted that the findings need to be considered with some caution.

Initial assessment of ATP compliance

The principal obligations ORR wanted to test are set out in the following two sections below. The findings are based exclusively on the observations and experiences of the auditors. Audits at unstaffed stations included partially staffed stations at which auditors were asked, if possible, to conduct their audits during the hours when staff were not present.

Figure 1: Accessible Travel Policy obligations tested

ATP obligations		Staffed station	Unstaffed /partially staffed station
ATP A1.2c	Confirm the station's accessibility description on the NRE station pages (i.e. step-free access note; assisted travel and staff help available fields) accurately reflects what the passenger encounters at the station	Green	Green
ATP A1.2f	Request and receive unbooked assistance via Help Point (timing how long it takes for Help Point to be answered and for the assistance to arrive)	Not applicable	Amber
ATP A2.1.1	ATP leaflet is available (or DPPP leaflet) on a rack or at the ticket office of every train operator who calls at the station	Red	Not applicable
ATP A2.3.1a	Train departures and arrivals information: this must include a commitment to providing, wherever possible, clear and consistent aural and visual information: both at the platform and on the approach to stations	Dark green	Green
ATP A2.3.1b	Clear signage to enable a disabled person to navigate around the station, including the locations of ticket office/TVMs, toilets (if relevant), platforms and onward accessible travel	Green	Green
ATP A2.4.2	Category A, B, C stations have a clear information point (and make available all information in sections A2.4.2 a-d)	Amber	Red
ATP A2.4.4	A designated assistance meeting point	Amber	Not applicable
ATP A2.4.5	Easily accessible information (i.e. which can be viewed and read by a wheelchair user) must be provided at the station to inform passengers how	Green	Green

ATP A3.3	they can request assistance and find the nearest station		
ATP A3.3	Where a passenger can buy a ticket before boarding at the ticket office or TVM, the station operator must ensure that disabled passengers are unable to purchase, or warned against purchasing, tickets that cannot be made use of on the operator's service (e.g. due to the accessibility of rolling stock [e.g. when purchasing first-class tickets, the passenger should be warned if there is no wheelchair space in first class].	Not applicable	The number of responses was too small to provide a rating

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

The compliance scale above has been created by RiDC for illustrative purposes and is not reflective of the ORR's compliance testing policy.

Main findings

- **ATP A1.2.c:** Approximately one in three auditors (30%) recorded inconsistencies based on their observations at unstaffed/partially staffed stations and the information provided on the National Rail Enquiries (NRE) website. For staffed stations, it was almost one in four (23%). Very few auditors reported seeing any warning messages on the NRE website about the accessibility of features at the station (8% for unstaffed/partially staffed stations and 10% for staffed stations). Several factors make this assessment challenging. For one, there may have genuinely been very few issues at stations that warranted a warning message on the NRE website. Secondly, it was not possible to retrospectively look at an auditor's assessment of a station with certain inaccessible facilities, and cross-reference it with any warning being given on the NRE website. Therefore, we

would offer a word of caution in forming an accurate assessment of compliance against ATP A1.2c.

- **ATP A1.2f:** Seventy-nine auditors were asked to request assistance from a Help Point at an unstaffed/partially staffed station (65 auditors were able to find a Help Point). Of the 65 auditors who found a Help Point that they could access; 53 auditors attempted Help Point calls, of which 46 were connected to a Help Point operator; resulting in advice and assistance that enabled 41 auditors to successfully board a train and one to travel by accessible taxi. In most cases where there was no physical Help Point, a telephone number was displayed by the TOC. In these cases, where a Help Point didn't exist, auditors called a telephone number provided by the TOC.

- **ATP A1.2f:** Overall, 94% of the 79 auditors at unstaffed/partially staffed stations were able to board a train successfully (including the one auditor who travelled by taxi arranged by the Help Point operator). 41 of the auditors (52%) interacted with a Help Point operator and were able to board a train successfully (the Help Point operator typically provided guidance on what to do to board the train, or alternative means of making an onward journey if boarding the train was not an option). This figure (52%) is the basis of the compliance assessment for this report. 42% of the 79 auditors were able to board a train successfully but were assisted by staff at the station, the public or their carer (in some cases, auditors were accompanied by their carer or personal assistant), or the guard who saw them on the platform and helped them onto the train. 6% of auditors were unable to board a train and could not make an onward journey. These auditors were unable to request assistance and were not provided with an alternative means of making their onward journey and had to stop the audit.

- **ATP A2.1.1:** One in five staffed stations (21%) had an Accessible Transport Policy leaflet on display (only eight leaflets included a publication date). It is important to note that COVID-19 restrictions meant many leaflets and other materials were removed from stations. Unfortunately, an insufficient number of audits were conducted before the first national lockdown in March 2020 to provide a comparison between then and the resumption of the project. Therefore, we would offer a word of caution in forming an accurate assessment of compliance against ATP A2.1.1.

- **ATP A2.3.1 a:** The provision of live customer information screens (CIS) at the station entrance and platforms was much higher at staffed stations (89% and 94%, respectively) than at unstaffed/partially staffed stations (41% and 81%). For unstaffed/partially staffed stations we assessed this to be 'usually observed', as the size of some unstaffed/partially staffed stations meant that it was not practicable to have both sets of screens.

- **ATP A2.3.1 b:** Due to their size, smaller unstaffed/partially staffed stations have fewer facilities at both the station entrance and on the platform. For example, signage for help points to book or request assistance was relatively common at unstaffed/partially staffed stations (63% of stations audited had signs for Help Points), yet 14% of auditors still felt those signs were unclear. Whereas in the case of toilets, 18 unstaffed/partially staffed stations (as observed by auditors) out of 79 stations had a toilet. All but 2 of the 18 stations had signs indicating where the toilets were.

- **ATP 2.4.2:** At staffed stations, 91% of auditors observed the main information point. This figure falls to 71% for unstaffed/partially staffed stations.

- **ATP 2.4.2 a-d:** With regards to information specific to accessible travel (i.e. information about Passenger Assist, and about the accessibility of the services and facilities at other stations) the auditor's observations are much lower (26% and 19%, respectively). This is not the case for this type of information when audits at staffed stations are considered. However, the numbers (45% and 37%, respectively) are still relatively low when compared to the provision of general travel information. In both cases, the assessment is based on an average of the two scores (i.e. unstaffed/partially staffed stations = 22%; staffed stations = 41%).

- **ATP A2.4.4:** Auditors observed a designated assistance meeting point at 52% of staffed stations.

- **ATP A2.4.5:** Auditors at unstaffed/partially staffed stations were asked if they could physically access the main information point. In audits that were carried out at unstaffed/partially stations, 91% stated they could access the information point. When asked if the information was clear and easy to read, 75% of auditors at unstaffed/partially staffed stations stated that it was (at staffed stations the figure was 68%). These figures are the basis for this assessment.

- **ATP A3.3:** Of the 48 auditors who bought a ticket at an unstaffed station, only one received a warning about accessibility restrictions. Auditors did not record significant issues with purchasing tickets and accessibility restrictions. This could be explained by the fact the planned routes were accessible and the likelihood of accessibility restrictions would be limited. Given the very small response rate, a rating for this ATP obligation was not possible.

> "The conductor got off the train first, as promised, and immediately saw me with my stick and case and came to find out what help I needed and where I was going. Then helped me to my seat and put my case on the luggage rack just beside me." [Aviemore, ScotRail]

Figure 2. Passenger journey and delay compensation requirements tested against the Association of Train Operating Companies Approved Code of practice - Passenger Information During Disruption (ACOP) and National Rail Conditions of Travel (NRCoT) standards.

Passenger journey and delay compensation obligations	Staffed station	Unstaffed /partially staffed station
ACOP 7.3 Help Points 1. Information is available to passengers on how to use the Help Point and what it is for.	Not applicable	Dark green
2. Staff who answer the request through the Help Point will be trained on all systems required to give the relevant information.	Not applicable	Green
3. Time how long it takes for the Help Point to be answered, which can later be checked against station operator's policy on maximum Help Point response times.	Not applicable	Green
ACOP 7.3 Station Facilities Station operators must ensure that the station pages on NRE accurately reflect what the passenger encounters at the station.	Green	Green
ACOP 7.3 Announcements Journey information announcements should always be consistent with customer information screens (CIS).	Dark green	Dark green

ACOP 7.5 Post Journey Station operators should ensure that customers are provided with clear information relating to connections and onward travel once they arrive at their terminus station (e.g. onward travel posters).	Amber	Amber
NRCoT para 33 & various franchise requirements General requirements for station operators to display information about delay compensation, including eligibility (e.g. DR15, DR30) and how to claim (for all train operators calling at their station). Claim forms should also be available at staffed stations.	Red	Dark red
Various franchise requirements during disruption: 1. Passenger announcements are made at the station and that passengers are informed by staff of their rights to claim compensation under the relevant arrangement of the TOC they are travelling with 2. Delay compensation claim forms are handed out at the station or are readily available at the station 3. Information about passengers' rights to compensation are visually displayed on customer information screens (CIS)	Dark red	Dark red

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

The compliance scale above has been created by RiDC for illustrative purposes and is not reflective of the ORR's compliance testing policy.

Main findings

- **ACOP 7.3** (1) **Help Points:** Of the 65 auditors who found a Help Point, 82% agreed that there were clear instructions about using it. 89% of the 65 auditors who found a Help Point stated that it was clearly labelled as a Help Point.

- **ACOP 7.3** (2) **Help Points:** Of the 43 auditors who respondents who answered this question, 72% agreed/strongly agreed that the Help Point operator gave good advice about their onward journey (this figure is the basis for the

assessment in Figure 2). 19% agreed/strongly agreed that the Help Point operator didn't understand their requirements. 14% agreed/strongly agreed that the Help Point operator was dismissive and the auditor didn't feel like a priority. Other findings which highlighted the experiences of interacting with a Help Point operator at an unstaffed/partially staffed station, included:

- 60% of Help point operators knew which station the auditor was at.
- 31% of Help point operators could see the auditor on CCTV.
- 17% of Help point operators gave the auditor information on which carriages were wheelchair accessible. Not all auditors were wheelchair users and therefore this question was not applicable to all. See Appendix 3 for a breakdown of the auditor's disabilities

- **ACOP 7.3** (3) **Help Points:** 65% of calls to the Help Point operator were answered in less than one minute. 13% of the calls were either not connected or there was no answer.

- **ACOP 7.3 Station Facilities:** Almost one in three auditors (30%) recorded inconsistencies based on their observations at unstaffed/partially staffed stations and the information provided on the National Rail Enquiries (NRE) website. For staffed stations, it was almost one in four (23%).

- **ACOP 7.3 Announcements:** There were very few reports of inconsistencies between visual and audio announcements (3.8% at unstaffed/partially staffed stations and 3.6% at staffed stations).

- **ACOP 7.5 Post Journey:** 46% of auditors at unstaffed/partially staffed stations and 53% of auditors at staffed stations saw a poster detailing onward travel options. Only two auditors at an unstaffed/partially staffed station saw a poster telling them about routes that were not accessible. However, it cannot be assumed that where the information was not provided, the routes were accessible.

- **NRCoT para 33 & various franchise requirements:** 13 auditors experienced a disruption during their audit (9% of all the audits undertaken for this project). The assessment is based on the experiences of these 13 auditors. 18% of auditors at unstaffed/partially staffed stations and 27% at staffed stations saw a delay compensation poster.

- **NRCoT para 33 & various franchise requirements:** 6% of unstaffed/partially staffed stations and 22% of staffed stations had delay compensation forms.
- **Various franchise requirements during disruption:** Of the 13 auditors who experienced a delay or disruption to their journey, none of them was approached by a staff member to inform them about their right to claim compensation from the train company or were given a delay compensation form.

"The NRE website map said there was a help point. There was no help point on the platform." [Welshpool, Transport for Wales]

Conclusions

Many positives emerged from this exercise. For example, Help Point operators in the main were helpful and tried to understand our auditors' needs and travel plans. Where auditors did interact with staff (and the public), their experiences were predominately positive.

On the other hand, some aspects of the audits gave a mixed picture or proved to be inconclusive.

Just over half (52%) of auditors were able to request assistance from a Help Point operator at an unstaffed/partially staffed station (for example, what to do to get assistance to board the train or other receiving other practicable forms of assistance - the one auditor who was provided with an accessible taxi) and could board a train successfully. A further 42% were also able to board a train successfully. However, the experiences of this group of auditors at unstaffed/partially staffed stations relied on good fortune, the support of others and their own determination to complete their journey. We did not systematically collect data on these interventions and therefore cannot provide a detailed breakdown. The information was collated from open comment sections on the questionnaire. Examples that were given included assistance by staff at the station, the public or their carer, or the guard saw them on the platform and helped them onto the train. A small percentage of auditors (6% of the 79 auditors who audited unstaffed/partially staffed stations) were unable to board

a train and make their onward journey. This inconsistency suggests it may be difficult for disabled passengers to have confidence in boarding a train if they request assistance from a Help Point at an unstaffed/partially staffed accessible station.

Despite there being variations in the observations of auditors at staffed and unstaffed/partially staffed stations with respect to train departure and arrival signs, context cannot be ignored. Due to their size, smaller unstaffed/partially staffed stations will inevitably have fewer facilities at both the station entrance and on the platform. Nevertheless, the audits did indicate that the provision of accurate and accessible information about accessible rail travel was inconsistent across staffed and unstaffed/partially staffed stations.

The audits also uncovered several methods employed by TOCs for arranging (where reasonably practicable) unbooked assistance, or 'turn up and go', that require further consideration. For example, there may be a need for harmonisation and standardisation in the design and functionality of Help Points and what disabled passengers can expect when they request turn up and go assistance.

The audits also uncovered some areas for improvement related to the accessibility infrastructure. There were issues concerning communications, signage, information and support which emerged at each of the four stages (arriving at the station, at the station, getting on the train, and post journey) of this audit. Without consistency in signage, toilets, websites, and the operation of Help Points, compliance with the obligations in the ATP for turn up and go travel for disabled people will be limited.

Overall, these audits suggest priority is not given to displaying information and advice to assist disabled passengers travelling on the network. Instead, advertisements and offers seem to take prominence in many stations. However, compliance with the provision of passenger information and signage for generic station services (such as ticket machines and platforms) is high. The same cannot be said for information about assisted travel. Undoubtedly COVID-19 restrictions will have had an impact here, but it is not clear if practices will be restored to meet the obligations in the ATP.

The findings and the compliance assessment must be viewed through this lens. We cannot say that certain practices to comply with aspects of the ATP would have been implemented if COVID-19 restrictions had not been introduced (or indeed removed or changed due to restrictions). Specific examples relate to the display of ATP leaflets or distributing delay compensation forms. Therefore, we can only report what the auditors observed and experienced on their stations' visits and subsequent journeys. It would be interesting to re-run the process and compare compliance rates when the rail network returns to full capacity, and disabled passengers feel more confident travelling.

1: Introduction

The Office of Rail and Road (ORR) is the independent safety and economic regulator for Britain's railways. A condition of the operating licences that ORR grants to mainline train and station operators requires licence holders to provide appropriate, accurate and timely information to enable railway passengers and prospective passengers to plan and make their journeys with a reasonable degree of assurance, including when there is disruption[1]. ORR also requires operators to establish and comply with an Accessible Travel Policy (ATP, previously Disabled People's Protection Policy, DPPP).

The Accessible Travel Policy (ATP) sets out the arrangements that an operator will put in place to support disabled passengers. A key aspect of ORR's regulatory work is to ensure that Train Operating Companies (TOCs) and Network Rail fulfil the commitments made to passengers in their ATP.

Specifically, the ATP contains obligations relating to requesting and receiving unbooked assistance ('turn up and go') from a Help Point (where reasonably practicable). The ATP (see also section 4: A1, A3, A4, A5) explains that passengers who require assistance can turn up at any station they have identified that is accessible to them. They can request assistance to board a train from a member of staff, or via a help point or a freephone number – either this will be provided or, where reasonably practicable, alternative accessible transport offered at no extra cost to the passenger. It will be explained to passengers that where assistance has not been booked in advance, and an accessible alternative is being offered, it may take a period of time to be provided.

This project audited 'turn up and go' (i.e. unbooked assistance, where reasonably practicable) across 147 stations managed by 21 TOCs. This former Disabled People's protection policy obligation was revisited and updated through the revised ATP Guidance published in July 2019 and later updated in September 2020. Passenger Assist and pre-booked assistance are not within this project's scope.

The Research Institute for Disabled Consumers (RiDC) designed a programme of passenger audits to test compliance with specific obligations contained within the ATP, Passenger Information and delay compensation regulations at 147 stations. Due to COVID-19 and subsequent lockdowns across the UK, it was necessary to pause the research early in March 2020. RiDC and ORR came to a joint decision to halt the project as the auditors' safety was paramount during the various lockdowns. When Government guidance regarding travel on public transport was updated, it was agreed the project could restart in mid-September 2021. Fieldwork was completed by mid-November 2021.

2: Background and objectives

The Office of Rail and Road's ATP Guidance sets out the commitments that train and station operators must make in their plans to support disabled and older passengers in completing their journey by rail.

By following the ATP Guidance, train and station operators will be able to provide a better, more reliable service for passengers who book assistance in advance and those who request help at a station (turn up and go). Following publication in July 2019, the guidance was updated in September 2020 to add new rules on the provision of accessible rail replacement services.

In addition to the obligation for 'turn up and go' unbooked assistance (where reasonably practicable), the ATP also includes obligations that require:

- Passenger leaflets about making rail accessible for older and disabled people.
- Station accessibility information.
- Rolling stock accessibility information.

Train and station operators as a condition of their operating licences must provide appropriate, accurate and timely information to railway passengers (also stipulated in the ATOC Approved Code of Practice (ACOP) and the National Rail Conditions of Travel (NRCoT)). As mentioned above, operators are also required by their operating licences to establish and comply with an Accessible Travel Policy (ATP) which the ORR must approve.

An ATP sets out, amongst other things, the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use.

The compliance of train and station operators with their ATP obligations has never been audited at this level. This project was designed to assess and observe

compliance from the perspective of disabled rail passengers to create a baseline before the approval and implementation of operators' ATPs. The timescales for approval were adjusted due to the COVID pandemic and the impact on the rail network and operators.

The objectives of this project were:

1. Generation of a 'compliance baseline' for station operators on selected aspects of ORR's new Accessible Travel Policy, Passenger Information, and delay compensation regulatory obligations.
2. Understand compliance with 'turn up and go' (unbooked assistance), at an industry level, with the obligation to assist passengers (where reasonably practicable) who travel without booking ahead.
3. Understand how policies are currently being implemented in the real world and the impact on disabled passengers.

3: Methodology

This project represented a significant logistical challenge in terms of sample selection and auditor recruitment. The overall methodology for this project consisted of the following four stages:

Station selection

We created a sample of 147 staffed (68) and unstaffed/partially staffed (79) accessible stations across 21 TOCs that manage stations (see Appendix 1 for a breakdown of the station sample).

There were five selection criteria:

1. Staffing levels
2. Accessibility
3. Help Point

4. Footfall: where feasible, stations were selected that were most significant for passenger journeys. Unfortunately, assist volumes by station do not exist so the next best thing was footfall 'entries and exits' station data.
5. Possibility of a journey to a staffed/unstaffed station

The status of the stations (staffed/unstaffed/partially staffed) was cross-referenced with National Rail Enquiries (NRE) website and included in the auditors' briefing documents.

As part of the selection process, stations were mapped against the home addresses of RiDC panel members. Several criteria were applied to recruit panel members to conduct the audits.

Auditor selection

After creating a sample of suitable staffed and unstaffed/partially stations, we mapped our panel member's profiles against the selected stations. The following criteria were used in the selection and recruitment of auditors.

1. Disability/impairment (mobility, sensory, cognitive).
2. Willing to do mystery shopping.
3. Willing to travel on trains.
4. Use of public transport.

Recruitment

There was a three-step recruitment process:

Step One – assigning auditors to networks

After an initial assessment of stations and potential auditors, a preliminary list of auditors was identified. Members of the RiDC team were assigned a TOC. They were responsible for selecting stations, and auditors, conducting the briefing (including journey planning) and providing a point of contact in case of emergencies.

Step Two – confirming audit plans

Potential auditors were contacted directly and asked if they were interested in the project and were briefed about what was required and the potential journey they could make, and a journey was suggested (unstaffed/partially staffed stations). Where feasible, this journey included a staffed station from the sample list.

Step Three – monitoring and updating audit plans

Levels of recruitment across the TOCs were monitored, and a secondary list of potential auditors was created and approached where recruitment was challenging (the staff list was also reviewed as part of this process). This step became increasingly important as concerns about COVID-19 began to emerge in February / March 2020 and when we restarted the project in September 2021.

Briefing

Once an appropriate panel member agreed to participate in the project, we provided them with a detailed briefing. This included:

- The purpose of the work.
- Overall instructions on what to do.
- NRE accessibility information and station facilities to assess (specific to each auditor's station). Auditors did not cross-reference the information on the NRE website with the TOC's station information on its website as this was not included in the project specification.
- Tasks: covering the Help Point, signage/information, delay compensation, onward travel (staffed/unstaffed/partially staffed).
- Data collection – what information we needed them to gather and how to report their audit findings. Auditors were provided with the option of an online or paper version of the data collection tool). Participants were encouraged to upload photographs of the station and facilities they audited.
- Safeguarding – managing risk, when to halt the mystery shopping exercise (and what to do next), and what to do if they get into trouble (each auditor had a named contact at RiDC).
- Consent form.

Auditors were paid £100 for an unstaffed station audit and £40 for a staffed station. Carers (where appropriate) were paid £20 if they accompanied an auditor on their journey. All travel expenses were covered.

A total of 63 auditors took part in this project (this number includes four expert reviewers). When it was not possible to recruit an auditor for a staffed station, the audit was conducted by an expert reviewer. An expert reviewer was a member of the RiDC team who is skilled in understanding accessibility challenges. 20 of the 68 (29%) staffed stations were audited by an expert reviewer. All unstaffed/partially staffed stations were audited by a member of the RiDC Consumer Panel. See Appendix 3 for a profile of the auditors.

4. Structure of this report

The following sections of this report provide a detailed analysis of the auditors' observations and experiences. The findings are divided into four sections:

- Arriving at the station
- At the station
- Getting on the train
- Post journey

Each section corresponds to specific ATP, Passenger Information and delay compensation regulatory obligations. At the start of each section, a compliance assessment is given, followed by the data to substantiate this assessment. At the end of each section is a brief commentary on the broad themes the audits have uncovered and what they mean concerning the future implementation and monitoring of the ATP.

The results presented in this research are solely based on the auditors' findings. They were requested to make a 'normal' journey through the station and were instructed not to go out of their way to find certain facilities or services.

Where direct quotes are used from participants, they are verbatim and used to illustrate the broader findings. The individual auditor is not identified, nor any of their personal characteristics revealed. We have included at which station (and TOC) the audit took place.

Where changes in policy and practice because of COVID-19 restrictions may have impacted the findings, we have endeavoured to consider this in our assessment. Due to the relatively low number of audits conducted before COVID-19 restrictions came into place (33), it is impossible to provide a review of before and after COVID. The results are aggregated across all the 147 stations audited for this project, as the scope of the project did not include an assessment of individual TOCs.

The figures behind the audits

As previously mentioned, this was a complex and logistically challenging project. To illustrate this, we have gathered some of the statistics that sit behind all 147 audits carried out by 63 auditors.

- At unstaffed/partially staffed stations, auditors were asked 113 questions and they uploaded 244 pictures.
- At staffed stations, auditors were asked 81 questions and they uploaded 178 pictures. The auditors took all the images used in this report during their audits.
- Auditors spent a total of 48 hours 47 minutes auditing/waiting for trains at 79 unstaffed/partially staffed stations (an average of approximately 40 minutes per station).
- 84% of auditors have a mobility impairment (59% are wheelchair users).
- 24% of auditors have a non-visible disability.
- 23% of auditors have a hearing impairment.

5. Arriving at the station

This section of the audits examined the accuracy of the NRE website with respect to accessibility features and any notifications about inaccessible journeys.

Summary

ATP obligations		Staffed station	Unstaffed /partially staffed station
ATP A1.2c	Confirm the station's accessibility description on the NRE station pages (i.e. step-free access note; assisted travel and staff help available fields) accurately reflects what the passenger encounters at the station*	Green	Green
ATP A3.3	Where a passenger can buy a ticket before boarding at the ticket office or TVM the station operator must ensure that disabled passengers are unable to purchase, or warned against purchasing, tickets that cannot be made use of on the operator's service (e.g. due to the accessibility of rolling stock [e.g. when purchasing first-class tickets, the passenger should be warned if there is no wheelchair space in first class]	Not applicable	The number of responses is too small to provide a rating

Passenger journey and delay compensation obligations	Staffed station	Unstaffed /partially staffed station
ACOP 7.3 Station Facilities Station operators must ensure that the station pages on NRE accurately reflect what the passenger encounters at the station.	Green	Green

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant or not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

- **ATP A1.2.c & ACOP 7.3:** Approximately one in three auditors (30%) recorded inconsistencies in unstaffed station details provided on the NRE website based on their observations at the station (for staffed stations, it was one in four: 23%).
- **ATPA3.3:** Of the 48 auditors who bought a ticket at an unstaffed station, only one received a warning about accessibility restrictions. The station entrance, ticket machines, and platforms provided step-free access in almost all unstaffed and staffed stations.

Findings

National Rail Enquiries station pages

Before undertaking an audit, the auditors were provided with a detailed briefing outlining their required tasks. Included in the briefing was a station map(s) and links to the corresponding NRE website. Auditors were asked to review the station map and record any inconsistencies between the map and what they observed at the station. This task was carried out for both staff and unstaffed stations. See Appendix 2: Tables B and C for a full list of the inconsistencies identified by the auditors.

Table 1: Looking at the map/plan of your station, did you notice any inconsistencies during your audit?

	Unstaffed		Staffed	
	n	%	n	%
Yes	24	30.0%	16	23.6%
No	55	70.0%	52	76.4%
Total	**79**	**100%**	**68**	**100%**

> "Whilst it shows that there are ramps, the one on platform 1 was steep, not signposted (there was no sign to say you had to go up through a very holey carpark with no pavement) up a makeshift brick ramp onto the platform. On platform 2, frankly, there is no way I would be able to get up there in a manual chair, and my powerchair couldn't drive down it safely because it was incredibly steep. It says this nowhere that I could find on the map or NRE site, and therefore, if I had got off a train at platform 2, I would have been stuck. Might as well have been stairs." [Cardenden: ScotRail]

> "The NRE website map said there was a help point. There was no help point on the platform." [Welshpool, Transport for Wales]

Before setting out on their journey, auditors were asked to record if the NRE website provided any warning message(s) about the accessibility of the facilities (e.g. lifts being out of order) at their designated station.

Table 2: Before travelling, did you see any warning message(s) about the accessibility of the facilities at your station displayed on the National Rail Enquiries web page?

	Unstaffed		Staffed	
	n	%	n	%
Yes	6	7.5%	7	10.3%
No	73	92.5%	61	89.7%
Total	**79**	**100%**	**68**	**100%**

Very few auditors reported seeing any warning messages on the NRE website about the accessibility of features at stations (8% for unstaffed stations and 10% for staffed stations). Several factors make an assessment of compliance challenging. For one, there may have genuinely been very few issues at stations that warranted a warning message on the NRE website. Second, it was not possible to retrospectively look at an auditor's assessment of a station with certain inaccessible facilities, but where no warning had been given on NRE website. Therefore, we would offer a word of caution in forming an accurate assessment of compliance against ATP A1.2.c.

Step-free access at the station

Although not explicitly covered in any of the obligations assessed as part of this project, we wanted to understand how auditors experienced step-free access at several station facilities. Table 3 details the overall experience.

Table 3: During your visit to the station was there step-free access to the following areas…

Staffed	Station Entrance	Ticket machines	Platforms
Yes	97.0%	97.0%	94.0%
No	3.0%	3.0%	6.0%
Total	**68**	**68**	**68**
Unstaffed	Station Entrance	Ticket machines	Platforms
Yes	92.5%	96.7%	81.3%
No	7.5%	3.3%	18.8%
Total	**79**	**79**	**79**

Table 3 shows that almost all the stations selected for this project had step-free access at the station entrance, ticket machines, and platforms. Those who did experience difficulties were predominately concerned with getting from one platform to another (for example, issues such as the presence of stairs and the lack of lift or having to leave the station to get to another platform).

What did we learn from the audits?

There are significant inconsistencies between the information provided on NRE websites (ATP A1.2c & ACOP 7.3) and what passengers encounter at the station.

The issues highlighted by auditors were:

- The NRE website is not systematically updated when significant changes occur at stations. The reporting of developments was good (such as lifts being closed or installed) but not after the work had been completed.

- Meaningful information about gradients, step-free access and alternative routes (poor description of access around the station) was inconsistently presented and hard to find.
- Opening times and access to toilets and other facilities at unstaffed stations are not clear and, in some instances, not provided.

The implications of inaccurate information on the NRE website means that planning a journey is more challenging than it needs to be for disabled rail passengers.

> "The national rail site says there is no step-free access to platform one as the lift is out of service till 2020. It works fine. It also says there's no waiting room, but there is." [Gospel Oak, London Overground]

Auditors did not record significant issues with purchasing tickets and accessibility restrictions. This could be explained by the fact the planned routes were accessible and the likelihood of accessibility restrictions would be limited. Given the very small response rate, a rating for this ATP obligation was not possible (ATP A3.3).
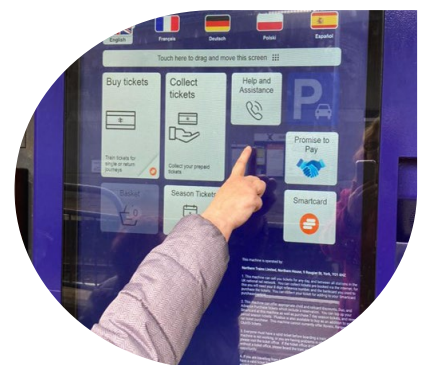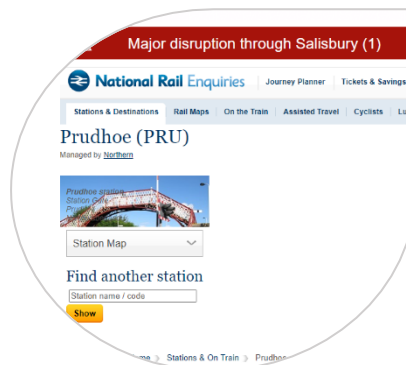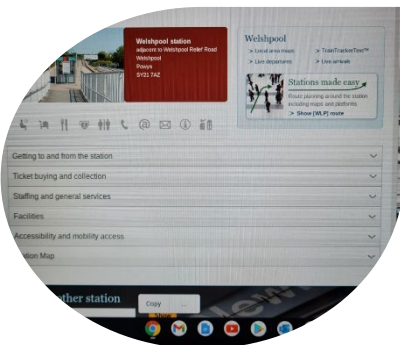
6. At the station

This section of the audit examined information and announcements at stations about departures and arrivals, signage that would allow a disabled person to get around the station, information points, and provision of the ATP leaflets.

Summary

ATP obligations		Staffed station	Unstaffed /partially staffed station
ATP A2.1.1	ATP leaflet is available (or DPPP leaflet) on a rack or at the ticket office of every train operator who calls at the station	Red	Not applicable
ATP A2.3.1a	Train departures and arrivals information: this must include a commitment to providing, wherever possible, clear and consistent aural and visual information: both at the platform and on the approach to stations	Dark green	Green
ATP A2.3.1b	Clear signage to enable a disabled person to navigate around the station, including the locations of ticket office/TVMs, toilets (if relevant), platforms and onward accessible travel	Green	Green
ATP A2.4.2	Category A, B, C stations have a clear information point (and make available all information in sections A2.4.2 a-d)	Amber	Red
ATP A2.4.4	A designated assistance meeting point	Amber	Not applicable
ATP A2.4.5	Easily accessible information (i.e. which can be viewed and read by a wheelchair user) must be provided at the station to inform passengers how they can request assistance and find the nearest station	Green	Green

Passenger journey and delay compensation obligations	Staffed station	Unstaffed /partially staffed station
ACOP 7.3 Announcements Journey information announcements should always be consistent with customer information screens (CIS).	Dark green	Dark green

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

- **ATP A2.1.1:** One in five staffed stations (21%) had an Accessible Transport Policy leaflet on display (only eight leaflets had a publication date).

- **ATP A2.3.1 a:** The provision of live customer information screens at the station entrance and platforms was much higher at staffed stations (90% and 94%, respectively) than at unstaffed/partially staffed stations (41% and 81%).

- **ATP A2.3.1 a:** There was also variation in the auditors' experiences of hearing information announcements about departures/arrivals at staffed and unstaffed/partially staffed platforms (82% heard announcements compared with 68%, respectively).

- **ATP A2.3.1 b:** Due to their size, smaller unstaffed/partially staffed stations will inevitably have fewer facilities at both the station entrance and on the platform. For example, signage for help points to book/request assistance was relatively common at unstaffed/partially staffed stations (63% of stations audited had signs for help points), yet 14% of auditors still felt those signs were unclear. Whereas in the case of toilets, 18 unstaffed/partially staffed stations (as observed by auditors) out of 79 stations had a toilet. All but 2 of the 18 stations had signs indicating where the toilets were.

- **ATP A2.3.1 b:** The clarity (and existence) of signage for ticket offices, ticket machines and platforms were reported as 'good' by most auditors at both staffed and unstaffed/partially stations.
- **ATP 2.4.2**: 91% of staffed stations had a main information point.
- **ATP 2.4.2 a-d**: Information specific to accessible travel, i.e. confirmation of help arrangements that can be made through Passenger Assist and information about the accessibility of the services and facilities at other stations, the auditor's observations are much lower (26% and 19%, respectively). This is not the case for this type of information when audits at staffed stations are considered. However, the numbers (45% and 37%, respectively) are still relatively low when compared to the provision of general travel information. In both cases, the assessment is based on an average of the two scores (i.e. unstaffed/partially staffed stations = 22%; staffed stations = 41%).
- **ATP A2.4.4**: 52% of staffed stations had a designated assistance meeting point.
- **ACOP 7.3:** There were very few reports of inconsistencies between visual and audio announcements (3.8% at unstaffed/partially staffed stations and 3.6% at staffed stations).

Findings

Making Rail Accessible leaflet

Under the ATP obligations, section A2.1.1 stipulates that the ATP leaflet (or former DPPP leaflet) must be made available on a rack or at the ticket office for every TOC which travels through that station. This obligation only applies to staffed stations, and therefore only staffed stations were audited. Overall, 21% of auditors were able to find an ATP leaflet.

Table 4: Did you notice leaflets called Making Rail Accessible during your visit?

	Staffed	
	n	%
Yes	14	20.6%
No	54	79.4%
Total	**68**	**100%**

It is important to note that COVID-19 restrictions meant many leaflets and other materials were removed from stations. Unfortunately, an insufficient number of audits were conducted before the first national lockdown in March 2020 to provide a comparative analysis between then and the resumption of the project. Therefore, we would offer a word of caution in forming an accurate assessment of compliance against ATP A2.1.1.

There is a requirement that ATP leaflets are up to date. Eight auditors observed publication dates on the ATP leaflets they found. It was difficult for six auditors to decipher how up to date the leaflets were as they could not see a publication date.

Train departures and arrival information
Auditors were asked to look for specific information related to departures and arrivals.

Table 5: Travel information at staffed stations

Staffed	A fixed (not live) sign showing train destinations (e.g., Platform 1 trains to London)	A timetable information poster	A customer information screen(s) in the station entrance showing live departure information	A customer information screen(s) on your platform showing live departure information
Yes	59.7%	59.1%	89.4%	93.9%
No	40.9%	40.9%	10.6%	6.1%
Total	**68**	**68**	**68**	**68**

Auditors observed live customer information screens at the station entrance and on the platform at almost all the audited staffed stations. Auditors observed fixed signs and timetables at over half of all staffed stations. There were four staffed stations at which auditors did not observe CIS on the platform showing live departure information. The information may have been displayed but this was not observed by the auditors and has been reported as such. The stations were: Norwich, Aylesbury, Haymarket, and Hexham.

Table 6: Travel information at unstaffed/partially staffed stations

Unstaffed	A fixed (not live) sign showing train destinations (e.g. Platform 1 trains to London)	A timetable information poster	A customer information screen(s) in the station entrance showing live departure information	A customer information screen(s) on your platform showing live departure information
Yes	63.3%	61.3%	41.3%	81.0%
No	36.7%	36.7%	58.8%	19.0%
Total	**79**	**79**	**79**	**79**

At unstaffed/partially staffed stations, fixed (not live) signs showing train destinations were much more prominent when compared with staffed stations. Fewer information screens were observed at station entrances, but live information screens were observed at 81% of unstaffed/partially staffed stations. These findings reflect the size and footfall at unstaffed/partially staffed stations, and certain facilities that are expected at staffed stations are not present in smaller, isolated stations.

Those auditors who observed customer information screens were asked to describe what type of information was displayed.

Table 7: You told us you saw a live customer information screen on your platform. What information was displayed here?

Yes	Unstaffed		Staffed	
	n	%	n	%
Live information listing train departure times	29	45.3%	53	84.1%
Live information listing station calling-points	27	42.2%	49	77.8%
Live information showing train destination/termination points	24	37.5%	48	76.2%
Live information about the train length (e.g. number of carriages)	15	23.4%	31	49.2%
Live information about the location of the accessible toilet on the train (e.g. in the second carriage)	2	3.1%	5	7.9%

Base: unstaffed stations = 64; staffed station = 63

Information on live customer information screens about the location of accessible toilets on a train was minimal (3.1% at unstaffed/partially staffed stations and 7.5% at staffed stations).

Announcements

Under section 7.3 of the ACOP, auditors focused on the consistency between journey announcements and the CIS.

Table 8: Did you hear any information announcements about train departures/arrivals? [unstaffed stations]

Unstaffed	In the station entrance	On the platform
Yes	26.6%	67.9%
No	73.4%	32.1%
Total	**70**	**72**

Table 9: Did you hear any information announcements about train departures/arrivals? [staffed stations]

Staffed	In the station entrance	On the platform
Yes	64.6%	81.8%
No	35.4%	18.2%
Total	**65**	**66**

Those auditors who heard an announcement either at the station entrance or on the platform were asked if it was clear and consistent with the information on the CIS. As shown in Table 10, a very small percentage of auditors reported inconsistencies between the visual and audio announcements (3.8% at unstaffed stations and 3.6% at staffed stations).

Table 10: Assessment of clarity and consistency of announcements

Yes, I heard an announcement	Unstaffed		Staffed	
	n	%	n	%
Overall, could you clearly hear and understand the information announcements in the station entrance?	15	93.8%	37	88.1%
Overall, could you clearly hear and understand the information announcements on the platform? -	40	76.9%	49	90.7%
Did you notice any differences/inconsistencies between the visual information and audio announcements that you saw and heard? (e.g. the departures board showed that my train was due to depart at 13:00, but I also heard an announcement that said that this train was cancelled)	2	3.8%	2	3.6%

Signage

Auditors were asked to comment on the existence and clarity of signage that is designed to enable a disabled person to navigate around the station. This included the locations of ticket office/Ticket Vending Machines (TVMs), toilets (if relevant), platforms and onward accessible travel.

The most common signs at unstaffed/partially staffed stations were:

- Platforms (83%)

- Help point to book/request assistance (63%)

- Ticket machines (60%)

The least common signs at unstaffed/partially staffed stations were:

- Designated assistance meeting points (13%)

- Accessible toilet (20%)

- Toilet (21%)

The signs (where they existed) that were rated as not being clear by unstaffed/partially staffed stations auditors were:

- Lifts (18%)

- Help point to book/request assistance (14%)

- Accessible toilets (13%)

The findings need to be put into context. Only 14% of the unstaffed/partially staffed stations that were audited had signs for lifts, but nevertheless, almost one in five auditors found the signage to be unclear. Whereas signage for help points to book/request assistance was more ubiquitous (63% of stations audited had signs for Help Points), yet 14% of auditors still felt those signs were unclear.

On relatively small unstaffed/partially staffed stations with low footfall, the Help Points can be obvious when you enter the station/platform and, therefore, the scores for the existence of meeting point and Help Point signs are low. It is advisable to take this consideration into account when interpreting these findings.

"Some plastic covers over notices semi-opaque and difficult to read. Other platforms had some more information included and accessibility notes." [Bleasby, East Midlands]

The most common signs at staffed stations were:

- Platforms (99%)
- Ticket office (93%)
- Ticket machine (91%)

The least common signs at staffed stations were:

- Designated assistance meeting points (33%)
- Onward accessible travel (37%)
- Accessible information point (60%)

The signs (where they existed) that were rated as not being clear by auditors at staffed stations were:

- Accessible toilets (23%)
- Waiting room/shelter (20%)
- Help point to book/request assistance (17%)

"They just weren't there, I searched a few times. Needs to be signage about the accessible toilet as it's away from the main concourse. The help points and waiting room are not signed very well from the main entrance and main concourse." [Norwich, Greater Anglia]

"There were two notices which read 'for wheelchair assistance please contact a member of staff'. Not all disabled people that need assistance are wheelchair users." [Rochdale, Northern]

Where auditors reported the signs were unclear for both unstaffed/partially staffed and staffed stations, the reasons they gave for unclear signage were consistent:

- Confusion about where the signs were pointing,
- The signs are obscured/hidden and hard to visually read
- The height or accessibility of signs (e.g. font size)

There were no comments about misunderstanding the language or interpreting the signs themselves. The full data tables relating to signage are presented in Appendix 2, Tables D and E.

Station facilities

Auditors at staffed stations were asked to find a designated assistance meeting space. This was not a requirement at unstaffed/partially staffed stations.

In addition to the designated meeting space, we asked auditors if they observed other facilities and services at staffed stations.

Table 11: Did you notice if the following facilities were available during your visit? [staffed stations]

Staffed	Waiting rooms	Public WIFI	Toilets	Accessible toilets either within the station building or on the platform	National Key Toilets (RADAR key)	A main information point	A designated assistance meeting point
Yes	74.6%	64.2%	86.6%	82.1%	64.2%	91.0%	52.2%
No	25.4%	35.8%	13.4%	17.9%	35.8%	9.0%	47.8%
Total	**68**	**68**	**68**	**68**	**68**	**68**	**68**

As can be seen in Table 11, 52% of auditors observed a designated assistance meeting point at one of the 68 staffed stations audited.

Table 12: Did you notice if the following facilities were available during your visit? [unstaffed stations]

Unstaffed	Waiting rooms	Public WIFI	Toilets	Accessible toilets either within the station building or on the platform	National Key Toilets (RADAR key)	A main information point
Yes	46.3%	25.0%	23.8%	21.3%	18.8%	71.3%
No	53.8%	75.0%	76.3%	78.8%	81.3%	28.8%
Total	**79**	**79**	**79**	**79**	**79**	**79**

Under ATP A2.4.2, there is an obligation for larger stations to provide a clear main information point, which should give the information contained under clauses a-d.

At staffed stations, 91% of auditors observed the main information point. This figure falls to 71% for unstaffed/partially staffed stations.

With respect to the provision of information under ATP A2.4.2 a-d, the auditors found the following.

Table 13: What information was available at this main information point?

	Unstaffed		Staffed	
	n	%	n	%
Timetables for trains calling at this station	35	43.8%	37	55.2%
Information about the services and facilities at this station	28	35.0%	43	64.2%
Information about making connections (both by train and other via other modes of transport)	27	33.8%	37	55.2%
Information about delays, disruptions and diversions	26	32.5%	31	46.3%
Confirmation of help arrangements that can be made through Passenger Assist	21	26.3%	30	44.8%
Information about the accessibility of the services and facilities at other stations	15	18.8%	25	37.3%

Base: yes (unstaffed base = 79); (staffed base = 68)

For information that was general and non-specific to accessible travel (i.e. timetables, station facilities and information about delays), on average, 36% of unstaffed/partially stations provided that information. This figure rises to 55% for staffed stations.

Where the information is specific to accessible travel, i.e. confirmation of help arrangements that can be made through Passenger Assist and information about the accessibility of the services and facilities at other stations, the auditor's observations are much lower (26% and 19%, respectively). This is not the case for this type of information when audits at staffed stations are considered. However, the numbers (45% and 37%, respectively) are still relatively low when compared to the provision of general travel information.

Auditors at both staffed and unstaffed/partially staffed stations were asked if they could physically access the main information point. In audits that were carried out at unstaffed/partially stations, 91% stated they could access the information point. At staffed stations, this figure was 100%.

When asked if the information was clear and easy to read, 75% of auditors stated it was at unstaffed/partially staffed stations and 68% stated it was for staffed stations. For those who did not find the information clear and easy to read, they said the following:

- "Too high with small writing. From a sitting position, you cannot read it."
- "Too high to see fine print from wheelchair especially times of trains – plastic cover obscured in places -difficult to read."
- "Wheelchair user could have a problem behind a cupboard."
- "Some of the information was difficult to read, as it was too high on the notice board."
- "It was high up, I had to strain my neck to see it."

What did we learn from the audits?

The findings from this section are somewhat inconclusive. Despite there being variations in observers of auditors at staffed and unstaffed stations with respect to train departure and arrival signs, context cannot be ignored. Due to their size, smaller unstaffed stations will inevitably have fewer facilities at both the station entrance and on the platform. Nevertheless, the audits did show that providing accurate and accessible information about accessible rail travel is very inconsistent across staffed and unstaffed stations. The level of information and signposting for specific assistance and accessible facilities is very low.

However, in our assessment of ATP A2.3.1b we gave it a 'usually observed' rating as signs for ticket machines and other general station facilities was high. It could be argued that the assessment should be less positive given the low levels of clear and visible information for facilities that help disabled passengers make the journey.

"Meeting point sign was hidden behind the ticket barriers, door to ticket office was covered in printed signs with no obvious distinguishing markers. The ticket machines were in plain view but had no clear signage distinguishing them from the rest of the foyer." [Peterborough, LNER]

To compound this issue, where signs did exist for accessible facilities or assistance for disabled travellers, these tended to be the signs that were less clear or obscured – when compared with signs for ticket offices, machines and platforms.

"I presume much of the information above might be available from staff at the information kiosk, but I don't know. No printed information was available on display - you had to ask at the kiosk to get any leaflets. Nor any list of what information might be available. But information seems to be available on the new touch screen information panels (several all around the station)." [Waterloo, Network Rail]

Consistency between audio and visual announcements was very good. However, for disabled travellers at isolated, unstaffed/partially staffed stations, the absence of live customer information and announcement on the platforms could increase anxiety

and feelings of isolation if a disabled traveller is worried about getting on the next train.

The other area where we cannot draw conclusive findings relates to the Making Rail Accessible leaflet. COVID-19 restrictions have inevitably changed how information is displayed, but despite this and any changes in policy and practice regarding the display of information, the number of leaflets that auditors found was very low and therefore assessed as 'hardly observed'.

7. Getting on the train

This section of the audits examined what happened when an auditor used the Help Point to request the provision of unbooked assistance (where reasonably practicable) to get on the next available train. This aspect of the audits was limited to unstaffed/partially staffed stations.

Summary

ATP obligations		Staffed station	Unstaffed /partially staffed station
ATP A1.2f	Request and receive unbooked assistance via Help Point (timing how long it takes for Help Point to be answered and for the assistance to arrive)	Not applicable	Amber

Passenger journey and delay compensation obligations		Staffed station	Unstaffed /partially staffed station
ACOP 7.3 Help Points 1: Information is available to passengers on how to use the Help Point and what it is for.		Not applicable	Dark green
2: Staff who answer the request through the Help Point will be trained on all systems required to give the relevant information.		Not applicable	Green
3: Time how long it takes for the Help Point to be answered, which can later be checked against station operator's policy on maximum Help Point response times.		Not applicable	Green

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

- **ATP A1.2f:** Seventy-nine auditors were asked to request assistance from a Help Point at an unstaffed/partially staffed station (65 auditors were able to find a Help Point). Of the 65 auditors who found a Help Point that they could access; 53 Help Point calls were attempted of which 46 were connected to a Help Point operator; resulting in advice and assistance that enabled 41 auditors to successfully board the train and one to travel by accessible taxi. In most cases where there was no physical Help Point, a telephone number was displayed by the TOC. In these cases, where a Help Point didn't exist, auditors called a telephone number provided by the TOC. This was the case for all Transport for Wales stations and a small number of Northern stations.

  ATP A1.2f: Overall, 94% of the 79 auditors at unstaffed/partially staffed stations were able to board a train successfully (including the one auditor who travelled by taxi arranged by the Help Point operator. 41 of the auditors (52%) interacted with a Help Point operator and were able to board the train successfully (the Help Point operator typically provided guidance on what to do to board the train, or alternative means of making an onward journey if boarding the train was not an option). This figure is the basis of the assessment for this report. 42% of the 79 auditors were able to board a train successfully but were assisted by staff at the station, the public or their carer (in some cases, auditors were accompanied by their carer or personal assistant), or the guard who saw them on the platform and helped them onto the train. 6% of auditors were unable to board a train and could not make an onward journey. These auditors were unable to request assistance and were not provided with an alternative means of making their onward journey and had to stop the audit.

- **ACOP 7.3**(1**) Help Points:** 82% of auditors agreed that there were clear instructions about using the Help Point. 89% of the 65 auditors who found a Help Point stated that it was clearly labelled as a Help Point.

- **ACOP 7.3**(2) **Help Points:** 72% of the Help Point auditors agreed/strongly agreed that the Help point operator gave good advice about their onward journey. 19% agreed/strongly agreed that the Help Point operator didn't understand their requirements. 14% agreed/strongly agreed that the Help point operator was dismissive and the auditor didn't feel like a priority.

- **ACOP 7.3**(3**) Help Points:** 65% of calls to the Help Point operator were answered in less than one minute. 13% of the calls were either not connected or there was no answer.

Findings

Using the Help Point

This section of the findings describes a step-by-step approach to what happened during the audits of unstaffed/partially staffed stations. It is important to note that this was the most complicated aspect of the entire project. There are several external factors that we could not control when the auditors tried to use the Help Point. Where external factors (i.e. interventions from staff or the general public) prevented the auditor from hitting the button, we will describe what happened. These journeys have been excluded from the final assessment as they were completed without using the Help Point, which was being audited in line with the ATP.

Table 15: During your visit to the station, were there any staff available to help you with your travel arrangements?

	n	%
Yes	14	17.5%
No	65	82.5%
Total	**79**	**100%**

Of the 14 auditors who stated there were staff available to help, the following happened:
- One couldn't find the Help Point.
- One found the Help Point but it was out of order (this auditor failed make their onward journey as the Help Point was not working and they were unable to request assistance).
- Three were directly assisted by staff.
- Nine requested assistance using a phone number provided by the TOC.

> "Not somewhere I felt safe and independent traveling alone. Machine not working, unable to purchase an onward travel ticket unable to speak or access help, telephone help number not valid, No toilets or facilities, alone on the platform for 1 hour with a patchy phone signal." [Beverley, Northern]

> "They took my name and number and asked me where I was going and what assistance I needed. I explained I was a wheelchair user. They said normally they require 6 hours' notice but told me to wait and they will get back to me, within 1 min they got back to say a member of staff will come to me and help me onto the train, A member of staff came to assist me on the train using a ramp." [Brimsdown, Abellio Greater Anglia]

The 65 auditors (out of a total of 79) who did not have staff to assist them with their travel plans were asked if they were able to find the Help Point. Sixty-four (98%) were able to find a Help Point.

Fifteen auditors could not find or access a physical Help Point. A breakdown of the reasons for this is shown below:

- Three stations show a Help Point that auditors could not access.
- One West Midlands station didn't have a Help Point (phone only).
- Four Northern stations didn't have a Help Point (phone only).
- Six Transport for Wales stations didn't have a Help Point (phone only).
- One East Midlands station didn't have a Help Point (phone only).

> "I made three calls that were answered requesting assisted travel [using the telephone number provided at the station]. Each occasion I was cut off. On the fourth call, I was told that I should have arranged travel 6 hours before travel or if there is staff at the station sort it out with them before 1pm. I asked what happened after 1pm if there are no staff there and got no answer. The fifth call I was given by Welsh Transport number was cut off. Called again and no answer." Welshpool [Transport for Wales]

"The only place we could access information on how to get assistance with our travel was the blue button on the ticket machine when you pressed it a phone number appeared on the ticket machine for you to ring however as I struggle to hold the telephone. I had to rely on my carer to ring the number on my behalf this was the Northern rail assistance line and we had to press option for the lady was very unhelpful and said we should have booked the train four hours in advance of needing it and that we should just wave at the guard when the train arrives. I was very disappointed. If the ticket machine had not been working there would've been no way of asking for assistance on the train." [Sowerby Bridge, Northern]

Of these 15 auditors, only two couldn't make their onward journey. Next, the auditors who could find a Help Point were asked to report on what happened when they hit the button to request assistance.

Table 16: Did you press the button on the Help Point / Information Point or phone the number displayed to request assisted travel?

	n	%
Yes	53	81.5%
No	12	18.5%
Total	**65**	**100%**

The reasons why the auditors did not press the Help Point button are listed in the table below (not all auditors provided a reason).

Table 17: Why did you not press the button on the Help Point?

	n	%
Staff at the station helped	3	30%
The help point was out of order	3	30%
Train arrived, and assistance was provided without using the Help Point	1	10%
I couldn't hear the operator	1	10%
Other people using it	1	10%
Sign saying to book assistance 24 hours in advance	1	10%
Total	**10**	**100%**

All the auditors could board a train successfully despite not using the Help Point for the reasons listed above. We then asked what happened next to the 53 auditors who hit the Help Point button.

Table 18: What happened when you used the Help Point/ Information Point or called the helpline telephone number?

	n	%
My call was answered	46	86.8%
My call was not answered	3	5.7%
There was no connection	4	7.5%
Total	**53**	**100%**

A total of seven auditors did not have their call answered (three did not have their call answered; four could not get a connection). Of these seven auditors (13%), five were able to make their onward journey, whilst two were unable to carry on, and the audits were recorded as a failure. See Appendix 2 for their responses.

> "I was unable to get assistance and was not travelling with carer. As platform was lower than train, getting on and off with crutches would have proven difficult."
> [Newquay, GWR]

The 46 auditors who had their calls answered were then asked how long it took for them to speak to a Help Point operator.

Table 19: How long did it take for your call to be answered? (This may have been a recorded message or an actual person)

	n	%
Less than 1 minute	30	65.2%
1 to 3 minutes	15	32.6%
More than 3 minutes	1	2.2%
Total	**46**	**100%**

Auditors were asked if they were put on hold and how long they had to wait before they spoke to the Help Point operator.

Table 20: If you were put on hold, how long did you have to wait to speak to a Help Point operator?

	n	%
Less than 1 minute	8	44.4%
1 to 5 minutes	8	44.4%
Never put through	2	11.2%
Total	**18**	**100%**

Out of the two auditors whose call was not put through, one auditor was able to make their onward journey (waved at the guard on the train for assistance), and the other was unable to complete their journey.

Auditors were then asked to record the response to their request to board the next available train to their required destination.

Table 21: What was the response to your request?

	n	%
I was told to wave at the driver as the train approached the station	5	10.9%
I was told to wait on the platform for the conductor/guard to get off the train to help me	26	56.6%
I was told to wait for other staff assistance at the station	2	4.3%
I received another response (please state)	7	15.2%
I was told to wait for an accessible taxi to pick me up at the station	1	2.1%
I was told that the station was staffed and to ask for assistance at the station: these five responses were not included in the total number of auditors who received direct assistance from the Help Point operator.	5	10.9%
Total	**46**	**100%**

One auditor was told they could not be provided with assistance to get on the train, but they were given a number for a local taxi firm. A taxi was arranged to take them to their destination. The auditor waited for 15 minutes for the accessible taxi to arrive.

Seven auditors were given another response to their request (all were able to make their onward journey). These are listed below:

- "They found it difficult to understand me and thought I was ringing from Norfolk."
- "I was told to wait at the Help Point whilst they contacted the station to assist me."
- "I was asked what assistance I needed and the station I was travelling to."
- "I was told they couldn't help, and they gave me a phone number to call."
- "I was asked for my number and told he would ring me back."
- "I was told I needed to give six hours' notice of assisted travel as "reports are sent every six hours" and as such, they could not contact the train I was travelling on."

- "As on outward journey, I was told I needed to give greater advanced notice of assisted travel."

Of the 31 auditors who were told to wave at the train driver or wait on the platform for the guard to get off the train to assist them, all 31 were able to successfully board the train. One auditor was told the guard was unable to help them, they were told to make their way to the other end of the train for the driver to fit the ramp. The auditor then boarded the train.

Finally, we asked the auditors who were able to speak to a Help Point operator if they were able to board the train successfully.

Table 22 summarises the outcome of all 79 audits. It should be noted that this exercise focused on what happened when assistance was requested directly from the Help Point operator after hitting the button.

Table 22: Were you able to successfully board a train

	n	%
Help Point operator assisted me to board the train successfully	41	52.0%
Boarded the train with assistance from others (staff or general public)	33	42.0%
Was unable to make the onward journey	5	6.0%
Total	**79**	**100%**

Just over half of all the auditors (52%), who were able to speak to a Help Point operator, were able to board the train successfully. This figure is the basis of the compliance assessment for this report.

Overall, 94% of auditors were able to make their onward journey with or without the assistance of the Help Point operator.

Help Point operators

Of those auditors who could speak to a Help Point operator, we asked them about their interactions with these individuals. In summary (for the full data table, see Appendix 2 Table K), the auditors found the following:

- 60% of Help point operators knew which station the auditor was at.
- 31% of Help point operators could see the auditor on CCTV.
- 17% of Help point operators gave the auditor information on which carriages were wheelchair accessible.
- 72% agreed/strongly agreed that the Help point operator gave good advice about their onward journey.
- 19% agreed/strongly agreed that the Help point operator didn't understand their requirements.
- 14% agreed/strongly agreed that the Help point operator was dismissive and the auditor didn't feel like a priority.

"They said they would contact the guard to make them aware I would need help. I have a speech impairment, and while I had to repeat myself a couple of times, the operator listened carefully and made me feel at ease." [Ewell West, South Western Railway]

The Help Point

The ATP stipulates that accessible information (i.e. can be viewed and read by a wheelchair user) must be provided at the station to inform passengers how to request assistance and find the nearest station. Auditors were asked to give their assessment of ACOP 7.3 obligations. In summary, (for the complete data table, see Appendix 2 Table L), the auditors found the following:

- 89% of the 65 auditors who found a Help Point stated that it was clearly labelled as a Help Point.
- 82% of auditors agreed that there were clear instructions about using the Help Point.

- 41% of auditors observed instructions about what to do if the Help Point did not work.

- 52% of auditors observed there was a phone number displayed on the Help Point for you to call to request assisted travel.

What did we learn from the audits?

The overall experience of the auditors who were able to speak to a Help Point operator was good. The overall majority of auditors felt they were treated with respect, and their assistance needs were listened to by the Help Point operators.

> "The operator explained that there were steps and bridge over the lines at Wivenhoe to get from platform 2 Clacton/Walton line to platform 1 Colchester/London line." [Wivenhoe, Greater Anglia]

The audit results in terms of getting assistance to board a train were slightly compromised by external factors (such as Help Points being out of order, staff and the general public). This meant that some audits were not completed in the way we had planned and fell outside the scope of the project. However, 94% of auditors were able to board the train successfully. Just over half (52%) were able to do so by speaking to a Help Point operator. The overall assessment is that the outcome was good when assistance was requested from a Help Point operator. However, over the 79 audits, there was an element of good fortune in getting assistance from other sources to get on a train without an operational Help Point. This uncertainty and consistency could make planning journeys more difficult, and therefore, disabled passengers are less likely to make a rail journey from an unstaffed station.

There were some inconsistencies across the 79 stations that were audited concerning how accessible travel is arranged via Help points (i.e. the type of Help Point and the method to arrange assistance – fixed point or telephone number). These inconsistencies could be confusing for passengers travelling across different TOCs, although our auditor's journeys were between the same TOC operated stations.

Although the number of 'failures' was low (6%), many auditors felt uncomfortable at the unstaffed station and would not feel confident making the same journey without someone with them. The relatively low level of information about what to do if something wasn't working was concerning. Only 41% of Help Points, as observed by auditors, stated what to do if it wasn't operational.

"The operator had said she would try to contact the train conductor and also asked my name and what colour coat I was wearing. She also told me to wait at the end of the platform and the conductor would get off the train to help me if she managed to get through to him but if not when he got off the train to ask him for assistance. The train pulled up and the conductor got off and asked my name before then helping me board the train." [Halewood, Northern]

8. Post journey

In this section, auditors were asked if they observed clear information relating to connections and onward travel. Also included in this part of the audit was information about delay compensation and what happened if there was any disruption to an auditor's journey. This aspect of the audits covered both staffed and unstaffed/partially staffed stations.

Summary

Passenger journey and delay compensation obligations	Staffed station	Unstaffed /partially staffed station/
ACOP 7.5 Post Journey Station operators should ensure that customers are provided with clear information relating to connections and onward travel once they arrive at their terminus station (e.g. onward travel posters).	Amber	Amber
NRCoT para 33 & various franchise requirements General requirements for station operators to display information about delay compensation, including eligibility (e.g. DR15, DR30) and how to claim (for all train operators calling at their station). Claim forms should also be available at staffed stations.	Red	Dark red
Various franchise requirements during disruption: 1. Passenger announcements are made at the station and that passengers are informed by staff of their rights to claim compensation under the relevant arrangement of the TOC they are travelling with 2. Delay compensation claim forms are handed out at the station or are readily available at the station 3. Information about passengers' rights to compensation are visually displayed on customer information screens (CIS)	Dark red	Dark red

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

- **ACOP 7.5:** 46% of auditors at unstaffed stations and 53% of auditors at staffed stations saw a poster about onward travel.

- **ACOP 7.5:** Only two auditors at an unstaffed station saw a poster telling them about some routes that are not accessible.

- **NRCOT para 33:** 18% of auditors at unstaffed stations and 27% at staffed stations saw a delay compensation poster.

- **NRCOT para 33:** 6% of unstaffed stations and 22% of staffed stations had delay compensation forms.

- **Various franchise requirements during disruption:** Of the 13 auditors who experienced a delay or disruption to their journey, none of them were approached by a staff member to inform them about their right to claim compensation from the train company or were given a delay compensation form.

Findings

Onward travel

Under ACOP 7.5 (Post Journey) obligation states station operators should ensure that customers are provided with clear information relating to connections and onward travel once they arrive at their terminus station (e.g. onward travel posters).

The following data is the auditors' experiences and observations under this obligation.

Table 23: During your visit did you see a poster about onward travel in the station?

	Unstaffed		Staffed	
	n	%	n	%
Yes	36	46.3%	36	52.9%
No	43	53.8%	32	47.1%
Total	79	100%	68	100%

Table 24: During your visit did you see a poster telling you that on some routes certain trains were not accessible?

	Unstaffed	
	n	%
Yes	2	2.5%
No	77	97.5%
Total	79	100%

Delay compensation

There are general requirements for station operators to display information about delay compensation, including eligibility (e.g. DR15, DR30) and how to claim, for all train operators calling at their station. It also states that claim forms should be available at staffed stations (NRCoT para 33).

Table 25: During your visit, did you notice a poster or sign about delay compensation anywhere in the station?

	Unstaffed		Staffed	
	n	%	n	%
Yes	14	17.3%	18	26.5%
No	65	82.7%	50	73.5%
Total	79	100%	68	100%

Table 26: What information about delay compensation was displayed?

	Unstaffed		Staffed	
	n	%	n	%
Your rights to claim compensation if delayed	14	100%	16	88.8%
Eligibility criteria for making a claim	13	92.8%	16	88.8%
How to make a claim	12	85.7%	13	72.2%
Total	**14**	**100%**	**18**	**100%**

Table 27: Did you notice if there were delay compensation claim forms available at this station?

	Unstaffed		Staffed	
	n	%	n	%
Yes	5	6.3%	15	22.1%
No	74	93.8%	53	77.9%
Total	**79**	**100%**	**68**	**100%**

Various franchise requirements

During disruption, station operators are obliged to ensure that:

1. Passenger announcements are made at the station, and that passengers are informed by staff of their rights to claim compensation under the relevant arrangement of the TOC they are travelling with

2. Delay compensation claim forms are handed out at the station or are readily available

3. Information about passengers' rights to compensation are visually displayed on customer information screens (CIS)

Table 28: At any point during the audit, did you experience any delays or disruption due to late running or cancelled trains (rather than a lack of assisted travel support)?

	Unstaffed		Staffed	
	n	%	n	%
Yes	9	11.4%	5	92.6%
No	70	88.6%	63	7.4%
Total	**79**	**100%**	**68**	**100%**

See Appendix 2, Table M, for a list of the information provided or displayed about delay compensation. We haven't included the tables in the main report as a small number of auditors (9) experienced a delay.

What did we learn from the audits?

Overall, the performance of the stations in providing information about onward travel and delay compensation details was poor.

However, COVID-19 restrictions may have impacted the availability of leaflets and other information, but auditors appeared to struggle even in large staffed stations to find details. Therefore, an objective assessment with the audits that were completed pre-COVID (36) and post-COVID restrictions (111) is not achievable.

9. Compliance

Set out below are the principal obligations that ORR wanted to test compliance against. A RiDC assessment of compliance based on these obligations was carried out across 147 stations based on the observations and experiences of the auditors.

Figure 1: Accessible Travel Policy obligations tested

ATP obligations		Staffed station	Unstaffed /partially staffed station
ATP A1.2c	Confirm the station's accessibility description on the NRE station pages (i.e. step-free access note; assisted travel and staff help available fields) accurately reflects what the passenger encounters at the station*	Green	Green
ATP A1.2f	Request and receive un-booked assistance via Help Point (timing how long it takes for Help Point to be answered and for the assistance to arrive)	Not applicable	Amber
ATP A2.1.1	ATP leaflet is available (or DPPP leaflet) on a rack or at the ticket office of every train operator who calls at the station	Red	Not applicable
ATP A2.3.1a	Train departures and arrivals information: this must include a commitment to providing, wherever possible, clear and consistent aural and visual information: both at the platform and on the approach to stations	Dark green	Green
ATP A2.3.1b	Clear signage to enable a disabled person to navigate around the station, including the locations of ticket office/TVMs, toilets (if relevant), platforms and onward accessible travel	Green	Green

ATP A2.4.2	Category A, B, C stations have a clear information point (and make available all information in sections A2.4.2 a-d)	Amber	Red
ATP A2.4.4	A designated assistance meeting point	Amber	Not applicable
ATP A2.4.5	Easily accessible information (i.e. which can be viewed and read by a wheelchair user) must be provided at the station to inform passengers how they can request assistance and find the nearest station	Green	Green
ATP A3.3	Where a passenger can buy a ticket before boarding at the ticket office or TVM the station operator must ensure that disabled passengers are unable to purchase, or warned against purchasing, tickets that cannot be made use of on the operator's service (e.g. due to the accessibility of rolling stock [e.g. when purchasing first-class tickets, the passenger should be warned if there is no wheelchair space in first class]*	Not applicable	Number of responses is too small to provide a rating

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

The compliance scale above has been created by RiDC for illustrative purposes and is not reflective of the ORR's compliance testing policy.

Figure 2. Passenger journey and delay compensation requirements tested against ATOC Approved Code of practice - Passenger Information During Disruption (AOCP) and National Rail Conditions of Travel (NRCoT) standards.

Passenger journey and delay compensation obligations	Staffed station	Unstaffed /partially staffed station
ACOP 7.3 Help Points 1. Information is available to passengers on how to use the Help Point and what it is for.	Not applicable	Dark green
2. Staff who answer the request through the Help Point will be trained on all systems required to give the relevant information.	Not applicable	Green
3. Time how long it takes for the Help Point to be answered, which can later be checked against station operators' policy on maximum Help Point response times.	Not applicable	Green
ACOP 7.3 Station Facilities Station operators must ensure that the station pages on NRE accurately reflect what the passenger encounters at the station.	Green	Green
ACOP 7.3 Announcements Journey information announcements should always be consistent with customer information screens (CIS).	Dark green	Dark green
ACOP 7.5 Post Journey Station operators should ensure that customers are provided with clear information relating to connections and onward travel once they arrive at their terminus station (e.g. onward travel posters).	Amber	Amber
NRCoT para 33 & various franchise requirements General requirements for station operators to display information about delay compensation, including eligibility (e.g. DR15, DR30) and how to claim (for all train operators calling at their station). Claim forms should also be available at staffed stations.	Red	Dark red

Various franchise requirements during disruption: 4. Passenger announcements are made at the station and that passengers are informed by staff of their rights to claim compensation under the relevant arrangement of the TOC they are travelling with 5. Delay compensation claim forms are handed out at the station or are readily available at the station 6. Information about passengers' rights to compensation are visually displayed on customer information screens (CIS)	Dark red	Dark red

Intervals	Descriptive rating	Qualitative description	
0-20%	Fully not compliant	Never observed	Dark red
20%-40%	Not compliant	Hardly observed	Red
40%-60%	Neither compliant nor not compliant	Sometimes observed	Amber
60%-80%	Compliant	Usually observed	Green
80%-100%	Fully compliant	Always observed	Dark green

The compliance scale above has been created by RiDC for illustrative purposes and is not reflective of the ORR's compliance testing policy.

10. Conclusions

Many positives emerged from this exercise. For example, Help Point operators in the main were helpful and tried to understand our auditors' needs and travel plans. Where auditors did interact with staff (and the public), their experiences were predominately positive.

On the other hand, some aspects of the audits gave a mixed picture or proved to be inconclusive.

Just over half (52%) of auditors were able to request assistance from a Help Point at an unstaffed/partially staffed station (for example, what to do to get assistance to board the train or other receiving other practicable forms of assistance i.e. the one auditor who was provided with an accessible taxi) and could board a train successfully. A further 42% were also able to board a train successfully. However, the experiences of this group of auditors at unstaffed/partially staffed stations relied on good fortune, the support of others and their own determination to complete their journey. We did not systematically collect data on these interventions and therefore cannot provide a breakdown. The information was collated from open comment sections on the questionnaire. Examples that were given included assistance by staff at the station, the public or their carer, or the guard saw them on the platform and helped them onto the train. A small percentage of auditors (6% of the 79 auditors who audited unstaffed/partially staffed stations) were unable to board a train and make their onward journey. This inconsistency suggests it may be difficult for disabled passengers to have confidence in boarding a train if they request assistance from a Help Point at an unstaffed or partially staffed accessible station.

Despite there being variations in the observations of auditors at staffed and unstaffed/partially staffed stations with respect to train departure and arrival signs, context cannot be ignored. Due to their size, smaller unstaffed/partially staffed stations will inevitably have fewer facilities at both the station entrance and on the platform. Nevertheless, the audits did indicate that the provision of accurate and

accessible information about accessible rail travel was inconsistent across staffed and unstaffed/partially staffed stations.

The audits also uncovered several methods employed by TOCs for arranging (where reasonably practicable) unbooked assistance, or 'turn up and go', that require further consideration. For example, there may be a need for harmonisation and standardisation in the design and functionality of Help Points and what disabled passengers can expect when they request turn up and go assistance.

The audits also uncovered some areas for improvement related to the accessibility infrastructure. There were issues concerning communications, signage, information and support which emerged at each of the four stages (arriving at the station, at the station, getting on the train, and post journey) of this audit. Without consistency in signage, toilets, websites, and the operation of Help Points, compliance with the obligations in the ATP for turn up and go travel for disabled people will be limited.

Overall, these audits suggest priority is not given to displaying information and advice to assist disabled passengers travelling on the network. Instead, advertisements and offers seem to take prominence in many stations. However, compliance with the provision of passenger information and signage for generic station services (such as ticket machines and platforms) is high. The same cannot be said for information about assisted travel. Undoubtedly COVID-19 restrictions will have had an impact here, but it is not clear if practices will be restored to meet the obligations in the ATP.

The findings and the compliance assessment must be viewed through this lens. We cannot say that certain practices to comply with aspects of the ATP would have been implemented if COVID-19 restrictions had not been introduced (or indeed removed or changed due to restrictions). For example, displaying ATP leaflets or distributing delay compensation forms. Therefore, we can only report what the auditors observed and experienced on their stations' visits and subsequent journeys. It would be interesting to re-run the process and compare compliance rates when the rail

network returns to full capacity, and disabled passengers feel more confident travelling.

A final reflection on the findings of this project is perhaps best encapsulated by an auditor that describes the variability (both positive and negative) that they experienced when carrying out the audit.

"After I had looked at the audit questions I was really disappointed at the lack of signs and information at this station. I know that Grimsby station has a problem with drunks and drug taking but to see that it's ok for everyone to access the disabled toilet by leaving the door open I did not find that very fair.

There was a key code on both the men and the women's toilets but it meant that everyone had to queue up to get the key code which no one wanted to do. There wasn't a sign on the toilet doors to say please go to the desk to get the key code for the toilet.

Once assistance was arranged the staff member came out early ready for the train. He let me know that my train would only be another few minutes. He put the ramp out efficiently and let me know that he would ring ahead to Cleethorpes station so that they are ready to help me off.

I did have to ask for information about Cleethorpes and what platform will I need to get off at when I come back to Grimsby. He showed me that it was on the opposite track and I would need to use the lift to access the bridge and then down in the lift again." [Grimsby and Cleethorpes, Northern]

Appendix 1: Sample frame

Table A: Number of audits completed by Train Operating Companies

Train operating company	Completed		Total
	Staffed	Unstaffed	
Avanti West Coast	2	-	2
c2c	2	-	2
Chiltern Railways	3	4	7
East Midlands Railway	3	6	9
Greater Anglia	3	6	9
Govia Thameslink Railway - Great Northern	2	1	3
Govia Thameslink Railway - Southern	2	4	6
Govia Thameslink Railway - Thameslink	2	1	3
Great Western Railway	5	7	12
London Northeastern Railway	3	-	3
London Overground	4	-	4
Merseyrail	2	2	4
Network Rail	9	-	9
Northern	6	9	15
ScotRail	4	8	12
South Western Railway	3	7	10
Southeastern	3	4	7
TfL Rail	2	-	2
TransPennine Express	2	3	5
Transport for Wales Rail	3	8	12
West Midlands Railway and London Northwestern Railway	3	9	12
Total	68	79	147
Target	66	79	145

Appendix 2: Data tables

Arriving at the station

Table B: NRE website inconsistencies [unstaffed stations]

- Waiting room was more like a mini tunnel. Didn't see a sign. Alloa, ScotRail
- The cafe/restaurant isn't accessible from the station. When I was there the door was locked and you would gave to exit the station in order to go to the other door of the cafe. Aviemore, ScotRail
- Westbound platform was away from the road, perhaps 70m and had a steep ramp up to the platform. Payphone was shown but this turned out to be the information point on the westbound platform. Bleasby, East Midlands Railway
- In the map I was given for Brimsdown Station. The map did not show the symbols for the Help Point but at both platforms a Help point was there. Your map needs updating to show this. Brimsdown, Greater Anglia
- Whilst it shows that there are ramps the one on platform 1 was steep, not signposted (there was no sign to say you had to go up through a very holey carpark with no pavement) up a brick makeshift ramp onto the platform. On platform 2 frankly there is no way I would be able to get up there in a manual chair and my powerchair couldn't drive down it safely because it was incredibly steep. It says this nowhere that i could find on the map or NRail enquiries site and therefore if I had got off a train at platform 2 I would have been stuck. Might as well have been stairs. Cardenden, ScotRail
- All of the photographs are wrong. There is no public phone. (there is a phone connected to network rail). There is NO disabled parking at RAF (checked at the Guardhouse). There is parking at the museum 3/4 miles away. There is no wheelchair access only via stairs. Cosford, West Midlands Railway and London Northwestern Railway
- The map seems out of date – I think the footbridge with the lifts may be quite new and are at the other end of the station; the accessible toilet is not marked either. Ewell West, South Western Railway
- The position of the lifts is not shown on the plan. Leominster, Transport for Wales
- On the map you need to provide information on the gradient of the slopes and ramps to access the station as they are very steep and would be impossible extremely difficult for a manual wheelchair user unless they had assistance I was using a powered wheelchair and we still found it very difficult. Mytholmroyd, Northern
- The information about Taxi, needs updating including details of WAV for those passengers who require that type of vehicle to complete their journey. Newcourt, GWR
- Access to platform 2 used to be across a level crossing but that has now gone. Newhaven Harbour, South Western Railway
- The map and station details on website were not working - there were errors but that could have been my browser. Prudhoe, Northern

- Station road looks like 90 deg bend, but it is not, and it is a long distance. Map does not indicate that the road has no safe path to get from westbound to eastbound platforms. It correctly shows that you cannot get to west of westbound platform onto station road which would have been conveniently near to Eastbound Platform which comes directly off Station Road. Eastbound is where the help point is located -correct on map. Rolleston, East Midlands Railway

- The map is difficult to understand. The actual route from car park to platform has: bridge that has a metal plate that made my wheels catch and jump; then many right-angled turns close together with a nasty lip that skewed me. What could be lifts are not - probably used to be the office/waiting room but now sealed off with metal doors (dark cubes on the map); looks like a person and child in a grey square is nothing (or walled off); the ramp down is a lengthy slope then a hairpin turn for lengthy slope back - quite time-consuming but OK. However, you can't figure that out from the map! Runcorn East, Transport for Wales

- There are only 20 parking places and No disabled free parking. There are more seats then shown. Shifnal   West, Midlands Railway and London Northwestern Railway

- There is nothing on the map to tell you that the ramp under the subway is a one in ten steepness of ramp was very dangerous in a powered wheelchair and would be extremely difficult/impossible in the manual wheelchair if unaccompanied.   Sowerby Bridge, Northern

- The disabled toilet had been doubled locked by the staff and I had to use the other one on the opposite platform. There was no sign to advise of this. St Austell, GWR

- When the station is unmanned, there is no access to toilets (assuming that the plan is accurate, the disabled WC is inside the locked areas. St Leonards on Sea, Warrior Square, Southeastern
  The help point was missing. Stourbridge Town, West Midlands Railway and London Northwestern Railway
  The NRE website map said there was a helppoint. There was no helppoint on the platform. Welshpool,Transport for Wales

Table C: NRE website inconsistencies [staffed stations]

- The map was completely wrong. The station has undergone a major refurbishment. The layout is completely different. Lifts have been installed to both platforms. Hackney Wick, London Overground

- The map notation said the lifts were not in service and they both worked. Dagenham Dock, c2c

- I looked for a display of digital train times but none available later noticed one on the platform. Weymouth, South Western Railway

- The information under the photos say wheelchair users can access all visitor areas and waiting rooms. But these are at first floor platform level and there is

no lift! Plus there is a threshold to the entrance to the waiting room from the platform. Seven Sisters, London Overground

- The national rail site says there is no step free access to platform 1 as lift is out of service till 2020. It works fine. Also says there's no waiting room, but there is. Gospel Oak, London Overground
- The information on staff help under 'Accessibility and mobility' is inconsistent. Under hours it says Mon-Friday plus Sat and Sunday Closed. It implies the station no help is available which isn't correct. Hampstead Heath, London Overground
- The assisted travel lounge is not shown on the map. London Liverpool Street, Network Rail
- Euston station is undergoing extensive building works and sections of the concourse and one entrance is blocked off. No mention on the National Rail information map or station description. The Assisted travel lounge/meeting point is not shown on the map. There's a new Changing Places toilet that's not on the map. Euston, Network Rail
- Ticket hall completely different - WCs and ticket desk on opposite sides to plan. No lift towers / lifts shown on map (or description of the station facilities). I think the station has been rebuilt/refurbished. Lichfield Trent Valley, West Midlands Railway and London Northwestern Railway
- The station has been updated completely. There are new accessible toilets and waiting room as well as a new ticket office and no step access to the platform. Ainsdale, Merseyrail
- The station has been updated completely there are new accessible toilets and waiting room as well as a new ticket office and no step access to the platform. Birkdale, Merseyrail
- Temporary Station WCs (substantial portacabin that included accessible WC) in a completely different position than on the plan, was not mentioned / shown. Edinburgh Waverley, Network Rail
- There's a new Changing Places toilet and signposting to it that isn't shown / mentioned on the National Rail site. Crewe, Avanti West Coast
- Waiting room is closed. Portsmouth Harbour, South Western Railway
- The map was of Wolverhampton Station before the changes which have been recently added - new ticket barriers / more disabled toilets etc. Work is still going on outside the station. The platforms, bridge, lifts etc. were unchanged but the entrance / WHSmith etc are all different. Wolverhampton, West Midlands Railway and London Northwestern Railway
Map indicated that there were two food vendors on platform 1. There is only one. Map indicates a waiting room and food vendor on platform 4. This is not accessible due to a high step at the door. Peterborough, LNER
To be honest, looked for loo without map, it was down a steep slope and needed a RADAR key, no staff to ask for key. Linlithgow, ScotRail

At the station

Table D: Reasons why signs were unclear [unstaffed]

- They weren't available. The only sign for the accessibility machine was on the machine itself.
- Most were not at this station. Platforms poorly signed. Assistance point and shelters were there but no signage to them.
- Some plastic covers over notices semi-opaque and difficult to read. Other platforms had some more information and accessibility notes "
- The sign pointed down an alleyway, the toilet was actually further down the platform.
- Very high sign by side of road for platforms. These were one for each but the type that could be swivelled on pole. also one partly obscured the other.
- photos 1-4 westbound platform (down unused lane with signs on road at other end from platform) to Nottingham - eastbound platform (immediately adjacent to road) to Newark.
- There are two tracks at the station with separate access ramps but there is no sign saying which track heads in which direction, thus no indication of which ramp to use - or stairs either, all users are equally unaware
- It was not ar an accessible height
- Help point sign is hidden behind lift building.
- The sign to the lift is hidden slightly to the lifts, so it makes it confusing where the lift is if you do not know.
- Was a button low down on the blue ticket machine
- "It was a push button on the blue ticket machine which wasn't very clear (other than for the fact I'd used similar in previous audit)
- For the platforms there was no indication at the top of the road that rail travel is only from one side opposite from car park side. If I was using a manual wheelchair instead of my powerchair this would have been an actual nightmare as slopes were steep. The shelter was obvious but the sign for there being a sign didn't exist.
- The 2 that were not clear was the platforms and shelters. No signs to either on the side I was travelling to Glenrothes with Thornton. There was a platform sign on the opposite side.
- "I walked past the accessible toilet without noticing it – only saw it after I got to the opposite platform.
- There are signs for the lifts when you get to the stairs for the platform bridge but nothing to indicate an accessible route at the entrances to the stations
- The help point was positioned back in an alcove at the end of the shelter. I saw it by going down the platform looking for it
- Platform one (Northbound - London etc) to is adjacent to the main entrance, platform two going Southbound to Tonbridge etc appears to be only accessible by the footbridge, I only realised differently when I observed a partially sighted gentleman crossing the track by way of the level crossing and some minutes later appearing on platform 2! It is not evident to a one-off traveller that this option is available
- The sign was only on the door and small.

Table E: Reasons why signs were unclear [staffed]

- The writing was far too small
- Sign usually too small
- "This station has so many signs it is totally confusing. All in different colours for different lines
- The platform layout and map is very complex and the numbering too. All maps of the station have to keep showing an arrow 'you are here'!"
- One entrance to the station is smaller (and stepped). If you come in that way there are no signs to the WCs or lifts. No signs to these from the platforms either. If you use the main (level access) entrance the WCs and lifts are in this area and well signed. Even had a braille map of the station.
- Lift entrances are outside the main station area - one in the car park, the other at the far side of the platform down a ramp. Lift towers built onto the side of the overhead footbridge.
- I found them by accident and the only sign was at that point.
- If you found the station plan you could find the facilities as all the signs were high level
- I think the lifts were fairly new - two towers connecting either side of the footbridge over the track. Small signs at the lift entrance but didn't see any elsewhere.
- They just weren't there, I searched a few times. Needs to be signage about the accessible toilet as it's away from the main concourse. The help points and waiting room are not signed very well from the main entrance and main concourse.
- It was just confusing, the help point was on one of the platforms, you saw as you got off the train. Should have been signage (clearer) to the accessible toilet. Most people would have to change at Norwich, need better info on this.
- No signs leading you to waiting room only visible on the room
- I would recommend checking what information was available at this station as it was obvious to be it was quite busy but with manned ticket sellers information would be easier to obtain. In my case I went to the window asking for train time and assistance and was immediately escorted by guard to train as it was about to leave
- "The toilets are being refurbished and I saw one sign to temporary portacabin... but no further signs. It just said 'Toilets this way'.
- There's a kiosk saying ' Mobility assistance ' on it but I didn't see signs to it."
- Lots of building work happening so it wasn't always clear where everything was or how to get there
- "Many of the signs were at the other end of the platform which you would need to know about before entering the station
- There are no lifts as the station is flat (end of the line) "
- A lot of these signs were at the location of the facilities, but not prior to them showing the direction in where to find them, so I just had to wonder a lot to find them.

- "Lifts - Signage is hidden around a corner, though I was able to find the lift.
- Waiting room sign small and not immediately obvious. Waiting room inaccessible due to covid
- restrictions (and the fact the rail staff are using it as a staff room)."
- The iconography on signage for the toilets and lifts is extremely small
- Meeting point sign was hidden behind the ticket barriers, door to ticket office was covered in printed signs with no obvious distinguishing markers. The ticket machines were in plain view but had no clear signage distinguishing them from the rest of the foyer.
- Tiny n high up...had to go down platform before I saw sign
- There was 2 notices which read 'for wheelchair assistance please contact a member of staff. Not all disabled people that need assistance are wheelchair users.

Table F: Information point – reasons why information not easy to read

- So many different posters/platform maps / signs for different train companies and lines everywhere...confusing
- You would need to ask for some of the information and the office/desk was shut. Rest was outside on posters at quite high level.
- There wasn't any information displayed or leaflets you had to ask the staff
- What there was behind a counter that was locked and "only manned when staff are available" (asked a staff member). Posters with some timetables and rail replacement information were nearby
- You needed to ask for all information from the kiosks. These had no posters just some leaflets but behind their plastic screen fronts. You'd have to ask for them.
- No Information displayed - except for a rail compensation and rail made easy leaflet. I presume you would have to ask for other things.
- Before COVID there was clearer info at the main customer service and welcome poster info. This is no longer the case. There is a whiteboard beside the info point, not sure if this is easy to read from a wheelchair or seated position. Plus it is written by hand in lots of marker colours.
- The board that had this info was quite high in part, and not that easy to read from a wheelchair,/seated position to read all of it.
- It was not displayed at an accessible height for me to read it easily. It was high up.
- No leaflets due to COVID
- I had to search for the information to locate signposted notices
- You had to ask the staff at the kiosk/ticket desk for all information. The leaflet stands were empty.
- There were no leaflets or posters available in the office. You would have to ask the staff at the counter, but presume would have all the info above.
- It is manned by a human during train running times, the last train leaves at midnight.
- No information was openly displayed except the Making rail Easier Leaflet and compensation and fares leaflets. You had to ask at the kiosk for help and then I presume you would be able to get some/all of the above information.

- Very minimal text information. Just timetable for trains, and information about delays and disruptions, but that's it.
- I presume much of the information above might be available from staff at the information kiosk, but I don't know. No printed information was available on display - you had to ask at the kiosk to get any leaflets. Nor any list of what information might be available. BUT the above information Q21 seem to be available on the new touch screen Information panels (several all around the station)
- The only information was via ticket office by asking questions, except disruptions to services and next rain arrival time via a digital display board.
- There was a wide desk between the information and the customer. It would be quite difficult for someone with visual impairments to access

Table G: During your visit, did you notice clear signs to the following facilities or areas (unstaffed station)

	Toilets	An accessible toilet	An accessible information point	Lifts	Help points, intercoms or assistance points to book/request assisted travel	Ticket office	Ticket machines	Platforms	A waiting room/ shelter	A designated assistance meeting point	Onward accessible travel
Yes, the sign was clear	88.2%	87.5%	93.3%	81.8%	86.0%	100.0%	100.0%	91.0%	90.7%	100.0%	95.0%
There was a sign but it wasn't clear	11.8%	12.5%	6.7%	18.2%	14.0%	0.0%	0.0%	9.0%	9.3%	0.0%	5.0%
Total	**17**	**16**	**30**	**11**	**50**	**30**	**48**	**67**	**43**	**10**	**20**
No sign observed	63	64	50	69	30	50	32	13	37	70	60

Base: unstaffed stations audited = 79

Table H: During your visit, did you notice clear signs to the following facilities or areas (staffed station)

	Toilets	An accessible toilet	An accessible information point	Lifts	Help points, intercoms or assistance points to book/request assisted travel	Ticket office	Ticket machines	Platforms	A waiting room/ shelter	A designated assistance meeting point	Onward accessible travel
Yes, the sign was clear	86.5%	76.6%	87.5%	85.1%	83.0%	93.5%	95.1%	98.5%	80.4%	86.4%	92.0%
There was a sign but it wasn't clear	13.5%	23.4%	12.5%	14.9%	17.0%	6.5%	4.9%	1.5%	19.6%	13.6%	8.0%
Total	**52**	**47**	**40**	**47**	**47**	**62**	**61**	**66**	**46**	**22**	**25**
No sign observed	15	20	27	20	20	5	6	1	21	43	42

Base: staffed stations audited = 68

Getting on the train

Table I: Reasons why participant didn't hit the HelpPoint button

- The station master was on the platform and came over to me when she saw me walking in using my sticks she gave me information regarding train and offer to help me aboard using a ramp as this station has a lower platform the normal stations. I did not need the use of the ramp.
- Not working
- My train was late, and I was scared of missing it.
- It wasn't working
- It was staffed
- It was marked out of order and could not press it because it was out of order
- I tried to use the Help point but was unable to properly hear due to the background noise and the help point being out in the open
- I am hard of hearing and had difficulty hearing the reply. A wheelchair user could tell the telephone operator their request but would struggle to hear the reply
- As there had been a fault with signalling other travellers were using the help point and the operator at the other end was not very clear and could not give clear directions
- As it is an unmanned station on the message on the platform about station assisted travel would have to be booked 24hrs in advance
- A member of staff had approached me to check I had the help/assistance I needed

Table J: Reasons why participant didn't hit the HelpPoint button

- I waited and went and asked the conductor myself to get me on, they got the ramp and I got on they put the ramp away and got back on the train
- I waited for the train and the train conductor assisted me to access the carriage, and off again at Aylesford
- I was able to find my way home
- Marked failed journey
- Member of the public help me
- There was a phone number to ring-I rang it the line was busy I hung up after 5 plus mins
- Was unable to get assistance and was not travelling with carer. As platform was lower than train, getting on and off with crutches would have proven difficult.

Table K: Experiences of interacting with a Help Point operator

	They provided good advice about my onward journey	They were able to advise on the accessibility of my proposed destination	They didn't understand my requirements	They were unable to help me	They were dismissive and I felt like I wasn't a priority	They kept me well informed	They told me what to do if something went wrong
Strongly agree	39.5%	18.4%	7.1%	12.8%	2.3%	23.8%	14.6%
Agree	32.6%	26.3%	11.9%	2.6%	11.6%	33.3%	9.8%
Not sure	9.3%	21.1%	7.1%	10.3%	4.7%	16.7%	7.3%
Disagree	9.3%	18.4%	28.6%	30.8%	18.6%	16.7%	39.0%
Strongly disagree	9.3%	15.8%	45.2%	43.6%	62.8%	9.5%	29.3%
Total	**43**	**38**	**42**	**39**	**43**	**42**	**41**

Table L: Assessment of environment around the Help Point

	It had step-free access	It was at a height accessible for a wheelchair-user	There were clear instructions about how to use the Help Point	There were instructions about what to do if the Help Point did not work	The screen or display was easy to read	The buttons or dials were easy to press	There was a working hearing loop	There was phone number displayed on the Help Point for you to call to request assisted travel
Agree	96.9%	92.1%	81.7%	41.2%	83.0%	98.2%	81.8%	52.2%
Disagree	3.1%	7.9%	18.3%	58.8%	17.0%	1.8%	18.2%	47.8%
Total	**64**	**63**	**60**	**51**	**53**	**57**	**22**	**46**

Post Journey

Table M: What information about delay compensation was displayed?

Unstaffed	I heard passenger announcements about my right to claim compensation from the train company	A member of staff informed me about my right to claim compensation from the train company	Delay compensation forms were handed out	Information about my right to claim compensation was displayed on customer information screens	Claim forms were made available to me
Yes	11.1%	0.0%	0.0%	11.1%	0.0%
No	88.9%	100.0%	100.0%	88.9%	100.0%
Total	9	9	9	9	9

Staffed	I heard passenger announcements about my right to claim compensation from the train company	A member of staff informed me about my right to claim compensation from the train company	Delay compensation forms were handed out	Information about my right to claim compensation was displayed on customer information screens	Claim forms were made available to me
Yes	0%	0.0%	0.0%	11.1%	25.0%
No	100%	100.0%	100.0%	88.9%	75.0%
Total	4	4	4	4	4

Appendix 3: Auditor profile

A total of 63 auditors took part in this project (this number includes four expert reviewers). When it was not possible to recruit an auditor for a staffed station, the audit was conducted by an expert reviewer from the RiDC team. 20 of the 68 (29%) staffed stations were audited by an expert reviewer.

Table N: Profile of auditors (we did not include any blind or partially sighted members of our panel. This was based on safety concerns at unstaffed stations)

Disability / impairment	n	%
Behaviour	4	5%
Communications	5	6%
Hearing	18	23%
Non-visible	19	24%
Mobility	66	84%
Cognitive	33	42%
Dexterity	26	32%

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