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Operator Managing Directors
By Email

Dear industry colleagues,

Disability awareness refresher training – regulator’s assessment

Well-trained staff are essential for an accessible railway. The industry needs people with the appropriate skills, knowledge and attitude necessary to effectively assist disabled people to travel with confidence. We have reviewed progress towards the delivery of the required refresher training on disability awareness and equality for all passenger-facing staff, and are pleased to find that, for the most part, the rail industry is making good progress.

Background and requirements

In July 2019 ORR published its new Accessible Travel Policy (ATP) [guidance](#). This recognises the importance of training for staff and defines minimum training requirements for when they are first recruited and on an ongoing basis throughout their careers. We worked closely with operators as they developed new training materials and, by the end of 2021, almost 30,000 staff had undertaken new induction training on accessibility. We published a [report](#) in March 2021 that identified good practice and areas of concern.

Regular refresher training is necessary to ensure that knowledge is retained, and that staff capability reflects changes to technology, regulatory requirements and passenger expectations. We require operators to be able to demonstrate on an ongoing basis that staff can deliver the mandatory training outcomes set out in the ATP guidance, including in areas such as communications skills, accessibility at stations and providing safe assistance. Passenger-facing staff must receive refresher training within 2 years of their initial training and then every 2 years thereafter.

For most operators the first wave of refresher training must be delivered by 31st July 2023. For eight (East Midlands Railway, Greater Anglia, LNER, Scotrail, Southeastern, Southwestern, Transport for Wales and West Midlands) the deadlines are later as they were late in completing delivering of their initial induction training.

Assessment of performance

We asked all operators to report to us on their progress with refresher training, as well as its format and scope. We reviewed their plans, to assess whether the training:

- Had been developed in consultation with disabled people;
- Would be delivered to all staff that interact directly with passengers;
- Would provide operators with reasonable assurance that their staff would be able to deliver the mandatory training outcomes set out in the ATP guidance;
- Was delivered in a way that provided staff with a safe space to explore the issues raised; and
- Would be delivered within two years of the operator's initial training programme.

In terms of **consulting disabled people**, all operators confirmed that they had shared plans for refresher training with their panels of disabled passengers, as required by ATP guidance. Some operators also made use of dedicated support from providers with expertise in the delivery of disability training.

All operators confirmed that **all their passenger-facing staff** were to receive the training, ensuring that these staff continue to be able to deliver the mandatory training outcomes set out in the ATP guidance.

We consider the proposals for **training format** to be effective in delivering the ATP guidance's mandatory training outcomes for all operators, with one exception – which we describe below. While in-person training is best-practice, we have also accepted e-learning as an appropriate delivery format for refresher training. Crucially, both methods allow for tests of understanding to be incorporated in the training, which are important in providing assurance that staff have received and understood the content.

Training is on course to be **delivered within two years** of operators' initial training programmes by almost all operators.

Best practice

Several operators have gone beyond the minimum requirements set out in the ATP guidance.

Grand Central, Greater Anglia, Merseyrail and Network Rail are **delivering refresher training to all staff**, rather than only those that are passenger-facing. This can contribute a positive and informed culture around accessibility across the respective operators' workforces.

In-person training methods are being used by c2c, CrossCountry, London Overground, Merseyrail and Network Rail to deliver the refresher training for passenger-facing staff. Grand Central is going further still and providing in-person training for all staff.

We also note that, alongside disability awareness, many operators are also delivering **training to accompany the roll-out of the Passenger Assist staff app**. This has the

potential to improve how passenger-facing staff communicate with each other, and so the reliability of assistance provision.

Delivery concerns

Network Rail and TransPennine Express have indicated that they are unlikely to be able to provide refresher training to staff before their deadlines of 31st July 2023. We welcome Network Rail's ongoing commitment to in-person training and have accepted a commitment from them to complete delivery within three months of their original deadline.

Unlike other operators that are delivering training either in the classroom or as e-learning, TransPennine Express proposed to issue the training as a section of a longer written briefing document, signed-for by staff. Given the proposals put forward by other operators, we considered that this delivery format fell short of the industry standard, as there is inadequate assurance that staff have received, retained and understood the training content.

We have engaged with TransPennine Express on this issue, seeking assurance that they will be able to deliver an e-learning module that meets expectations, and the timescales for doing so. They have put forward a plan that will see this training delivered by 31 December 2023. We will continue to monitor their progress against these timescales.

Next steps

The focus for operators should now be on timely delivery of refresher training. During this time, we welcome any further insights that operators wish to share, as well as notification of any material changes in timelines or delivery plans.

Looking ahead, we note that there are industry-led proposals for greater standardisation of refresher training. Rail Delivery Group has led an assessment of different operators' materials and will help to develop common training content for the whole industry, rooted in the ATP Guidance's mandatory training outcomes, and to be supplemented by operator-specific material to reflect service differences. We welcome the greater consistency that this collaborative approach should deliver for the service that passengers receive, as well as the potential for cost savings, knowledge sharing and best practice. We will continue to engage with industry to ensure that the approach continues to meet regulatory requirements.

Yours sincerely,

Jacqui Russell

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