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Dear Abigail

Amending licences to give passengers the information they need to plan and make journeys

Passenger Focus welcomes the Office of Rail Regulation's (ORR's) consultation on measures intended to improve the rail industry's obligations to provide information to passengers.

The National Passenger Survey (NPS) shows that passenger satisfaction with the handling of delays is low – 40% say things are handled well and 24% that they are handled poorly. NPS shows passengers' rating of the usefulness of information during delays is 47% good and 28% poor. Analysis of the NPS shows that how well train companies deal with delays is the biggest driver of overall dissatisfaction among passengers.

In December 2010 Passenger Focus published a major piece of research examining passengers' experiences during delays. It is entitled "Delays and disruption: rail passengers have their say", and is available at www.passengerfocus.org.uk. The research involved over 1,000 passengers and revealed that during delays and disruption passengers want the rail industry to treat them with respect, recognise their plight, help them avoid the problem in the first place, actively help them if a problem arises and to act joined up. The research again highlighted how information is vital to passengers' overall satisfaction during disruption and that it must be accurate, consistent and timely. Again and again passengers say to us that it is not the disruption *per se* that they blame the industry for, particularly if the root cause is an external event, but they cannot forgive the failure to keep them informed during the incident.

There are a number of initiatives within the rail industry at present that should improve passengers' experiences in the future. Nevertheless, we believe that obligations need to be placed on the industry to make sure these initiatives are driven through. In support of the ORR's proposal to amend passenger operators', station operators' and Network Rail's Licences, Passenger Focus makes the following observations:

- It is arguable that the initiatives currently being pursued by the industry would not be happening, or would not be happening to the degree they are, had Britain not experienced two bouts of severe winter weather within a single year (2010) which starkly highlighted



deficiencies and made information during disruption a political imperative to improve. If Britain, particularly South East England, were to experience a couple of benign winters, can we be sure that the rail industry will continue to take this subject seriously if it has no obligation to do so?

- The work that Arup have recently undertaken on behalf of ORR looking at the industry's adherence to its own Code of Practice on Passenger Information During Disruption (PIDD) reveals progress in some areas, but also that there is a long way to go. For example, Arup report that across all the incidents they reviewed "there were no instances of a fully developed 'prioritised plan' to manage the incident and recover the train service in a structured way." Again, without any obligations to do so, can we be sure that the Code of Practice will be imbedded in all parts of the industry as thoroughly as it needs to be?
- In 2004 Passenger Focus's predecessor organisation published research showing that passengers expect an acknowledgement within two minutes of a train coming to an unscheduled halt. This led the Association of Train Operating Companies (ATOC) to make this a mandatory item within its information good practice guides. Seven years later recently-completed research has confirmed that passengers believe two minutes remains appropriate, but that they are unconvinced that drivers and guards always do so. Passenger Focus believes it is reasonable to assume that had the proposed Licence condition been in place already, the industry would have had the incentive to ensure that such announcements are routine – in the way that London Underground has almost universally achieved in the same period.
- The industry's compliance with the mandatory items in the ATOC good practice guides, developed in response to the 2004 research referred to above ranges widely. It should be noted that train companies assess their own adherence, which is subject to no independent verification. Passenger Focus believes it is a reasonable assumption that had the proposed Licence conditions been in place already, there would have been greater impetus for train companies to implement good practice.

Passenger Focus continues to see examples of poorly-handled disruption, not least the industry's failure to provide accurate, timely and consistent information to passengers. On occasions it is as if the prolonged disruption of the last two winters had not happened and no lessons were learned. We cite three recent examples.

The disruption experienced by South West Trains passengers on 9 June 2011 as a result of attempted cable theft at Farnborough

A senior member of Passenger Focus staff was caught up in the disruption and reported:

- At 2130 staff were almost totally absent. Along the whole of the Waterloo gateline only one member of staff could be seen. Needless to say he was mobbed and the only thing he was heard to say was that he knew nothing. A few more staff appeared a bit later
- At 2200 the help desk shutter was pulled firmly down
- Trains appeared on the departure board to later, without any explanation, disappear



- Announcements were very unhelpful. The lack of any 'situational awareness' was clear – no-one said we are running trains, we will try and get you home – please be patient it may take some hours
- There appeared to be no sense of re-assurance, nor regret
- The cash points had all run out of money

We reproduce below some reports from other passengers caught up in the disruption

“first train shown at platform 5 was 2032 to Isleworth expected 2045, so I expected to catch that – although it was 2048 by then but it kept going back by a minute, always a minute before the real time. Then it went off the screen and first train shown was 2047 expected 2055 which was also Isleworth and I caught that. No reason given for this delay/cancellation.”

“I was caught up in this fiasco on Thursday night. I arrive at Waterloo about 22.40 to get a train home to Teddington. All the information boards were cleared apart from about 4 trains. There were absolutely no staff around to ask what was going on and no information was given over the tannoy. No trains were leaving and everyone at Waterloo were completely baffled with what was going on. I had no idea what was going on and there was no one to ask. After about half an hour I decided to take a tube to Embankment and then one to Richmond and take a taxi from Richmond (an expensive night out!). My main complaint is that there was absolutely no information provided. I feel sorry for anyone that was a visitor from abroad who would not necessarily know different ways of getting to their destination.”

The disruption experienced by National Express East Anglia passengers on Friday 10 June 2011 as a result of a person being hit by a train at Stratford

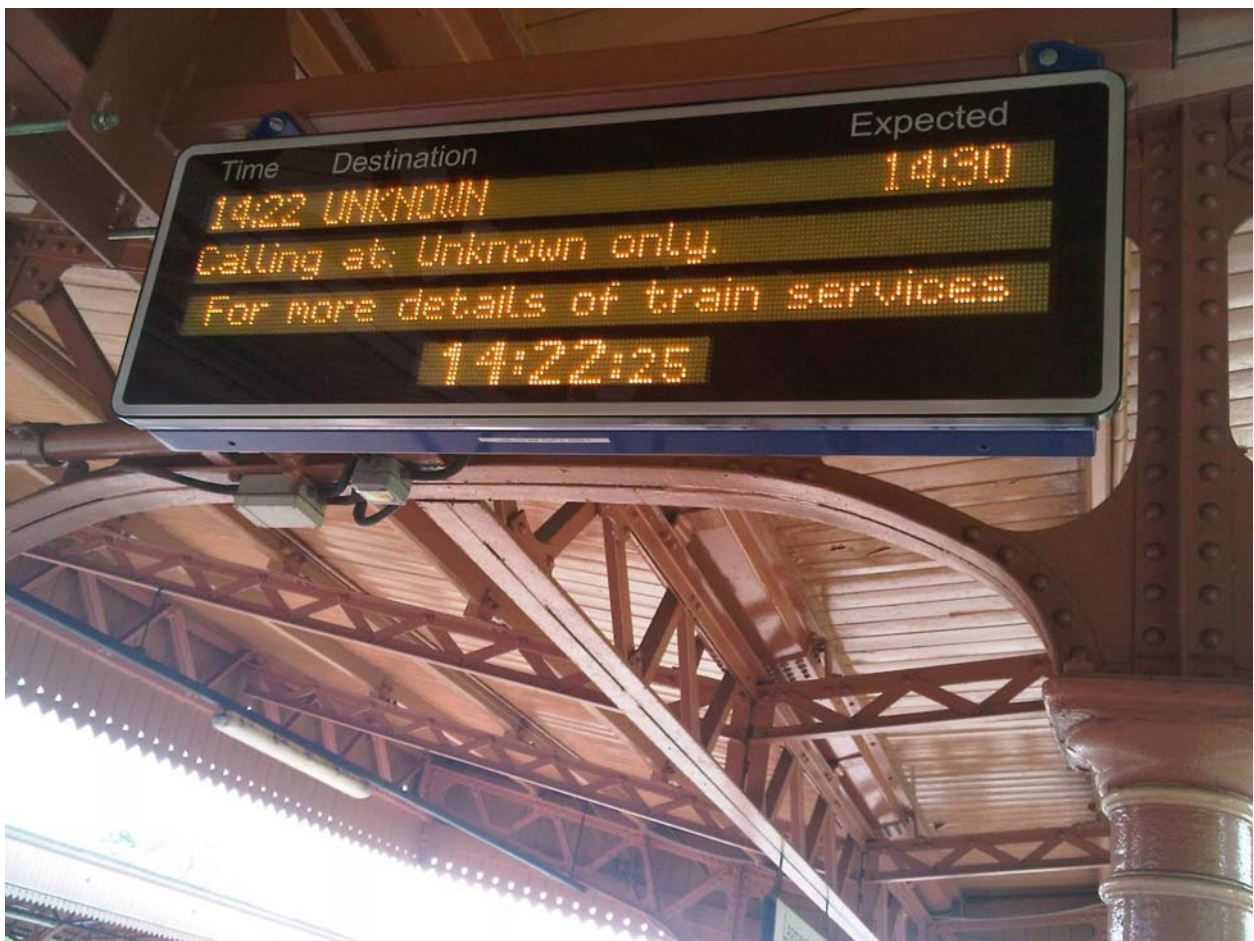
A different senior member of Passenger Focus staff was caught up in this disruption and also experienced a complete lack of 'situational awareness' that resulted in her lugging a suitcase down and up subway steps between platforms four times while changing trains – only to eventually board a train on the platform at which had she first arrived. She reported:

“On the train there were no announcements and no guard – I assume they are driver only. The train was slow. No one knew how long we would be. At times it went faster and then back to slow. People were getting calls from home and were saying I have no idea when this train will get to the destination. I got off at Manningtree. I didn't check the time because I thought I had to get under the subway to get my connection. There were no announcements, but the locals thought this was right and it was what I usually did so off we all went. No train, no announcements for at least 10 minutes. Then a train came in on the side platform from Harwich Town. I tried to get on but was told it wasn't running. The driver of the train then ran down the platform to check out where we would get a train. We were all sent back to platform 3. We waited at least 20 minutes: there were a few trains through, but all for Norwich. The tannoy system was rubbish – really hard to hear – and there was a lot of discussion about what was happening, with passengers drawing their own conclusions. Then we got told the train to

Harwich would come in on 3, but due to poor quality tannoy it was hard to tell if it was the next train or not. I tried to get on the next train but it was the wrong one. Eventually, at least 6.30, a train came in on the side platform 1 and we all charged across only to be told no, back to 3 it will come in on 3. It did almost immediately and finally at 7pm I got to Harwich Town instead of 5.22pm.”

The display of a train to an “unknown” destination at Leamington Spa on 29 May 2011

The photograph below requires no further comment:



Specific questions in the ORR consultation document

Do you agree that licences are the best place to set out aligned accountabilities for providing information?

In order that the obligations apply to both franchised and non-franchised train operators it appears to Passenger Focus that Licences are the best place for accountabilities to be set out.



Are there any other changes in the way the industry handles information for passengers that would complement new licence obligations and help the industry deliver the needed improvements.

Passenger Focus cites three areas in which we are yet to be convinced that current initiatives are sufficient. They are: our call for greater recognition of the impact on human beings when there is service disruption and that lack of information only makes matters worse; our call for a strategy to increase the proportion of passengers aware of disruption before they get to the station, and so potentially able to change their plans to avoid it; and our highlighting of the need for robust 'review and improve' processes that will drive continuous improvement in information provision.

Do you have any suggestions to improve the proposed licence drafting?

1. In the Network Rail licence, we recommend you consider amending 2.4 to read train operators **and station operators** in order to safeguard the interests of passengers using stations that are not operated by train companies.
2. We recommend that you consider introducing the concept of continuous improvement to the General Duty (4.2 of train operator licence and 2.2 of Network Rail's licence). The need to be able to demonstrate that processes and their execution are better this year than last will, we suggest, drive positive behaviours within the industry.

Conclusion

Passenger Focus supports the initiatives that the rail industry is currently pursuing. However the history of slow progress in this area over many years, and evidence of continuing basic failures despite the role out of "PIDD initiatives", leads us to conclude that obligations must be placed on the industry. Indeed, privately, some industry managers will concede that things will only really change if the industry is obliged to change. We therefore believe that the proposed Licence modifications are essential in the passenger interest and will ensure that the rail industry remains committed to improving information to passengers during disruption in the years ahead.

Yours sincerely

Guy Dangerfield
Passenger Issues Manager