

**Department for Transport Consultation on Revision on
How to Write Your Disabled Person's Protection Policy:
A Guide for Train and Station Operators.
February 2008**

- 1.01 Alan Rees, MBE, Secretary, SATA
- 1.02 20 Seaforth Drive, Edinburgh
- 1.03 EH4 2BZ
- 1.04 at.rees@sol.co.uk
- 1.05 Scottish Accessible Transport Alliance (SATA)
- 1.06 Representative organisation of disabled people and transport providers
- 1.07 Some 70 individual and corporate members. Views obtained by e-mail.

Question 1: Do you agree that disabled people should be the target audience for DPPPs?

Answer: Yes for the final documents produced by operators. This guidance for operators should also be available to disabled people.

Question 2: Do you agree that DPPPs should be revised on an annual basis?

Answer: Yes. It is important that information is kept up to date. The time taken to do the revision must be as short as possible but sufficient to allow for adequate consultation.

Question 3a: Do you agree that the DfT should approve revisions to DPPPs?

Answer: Yes, or Transport Scotland, in order to set and maintain standards and consistency. There should be a maximum on the time taken to give approval.

Question 3b: n/a

Question 4: Do you agree that the proposed title better reflects the intended purpose?

Answer: 'Travel information for disabled passengers' is better than the current title but 'travel information' could be misinterpreted as providing more general information for travellers and 'travel policy...' might be better.

Question 5: Do you agree that operators should prepare alternative formats once the DPPP is agreed?

Answer: Yes. Master copies should be produced that can be replicated instantly.

Question 6: Should operators be allowed to wait until an alternative format is requested before having it produced?

Answer: No. See the answer to question 5 above.

Question 7: Is ten working days reasonable?

Answer: No. See the answer to question 5 above.

Question 8: Introduction: what the document should contain

Answer: Agree.

It is important that operators state their commitment to equality for disabled people, what services they can expect, what access and facilities are available, how staff are trained, their legal requirements, complaint, comment and consultation procedures.

Question 9: Before your journey

Answer: Agree...but

On booking assistance, the draft document gives no requirement for a minimum 24 hours . The existing SRA Code of Practice (p 45) says 'Passengers should be able to make arrangements for assistance on a journey at 12 hours' notice, and in no circumstances must passengers be required to give more than 24 hours' notice.' Does this mean that no advanced notice is required or it is proposed to individual operators to decide (which is often a *minimum* of 24 hours)? This should be clarified. We favour no requirement being required for all but the more complex journeys as otherwise it discriminates against disabled people needing to travel at short notice and train operators can use e-mail and fax to communicate information very quickly. But if a time limit is given, then the existing advice should be included.

Question 10: Getting to the station

Answer: Agree.

It is usually possible for a disabled person to get transport to a drop

off point near the station entrance. The problems regarding accessibility usually arise once the disabled person is inside the station.

Question 11: Inside the station

Answer: Agree.

Question 12: Boarding the train

Answer: Agree.

There must be a commitment to the regular maintenance of equipment and regular monitoring of use or problems encountered.

Question 13: On the train

Answer: Agree.

As for boarding, regular maintenance and monitoring are vital. Overcrowding on services can be a serious problem.

Question 14: If things go wrong

Answer: Agree.

The guidance needs to say what action should be taken when the booked assistance fails to turn up, a common problem at the end of a journey. As a minimum there should be an accessible telephone to enable a disabled person to telephone for emergency assistance. Experience shows that problems are particularly likely where a disabled passenger has to alight at a small unstaffed station and there is no assistance.

The commitment under the section on comments, feedback and complaints for follow-up contact with those booking assistance should be for more than an unspecified percentage.

Question 15: Continuing your journey

Answer: Agree.

Operators need to provide clear information about the availability of taxis and private hire cars especially at small stations and recognise that not all such vehicles are accessible for all disabled people who have differing needs. The commitment to work with local authorities, other transport providers and user groups is vital.

Question 16: Comments, complaints and feedback

Answer: Agree.

See comment in answer to Question 14 above.

Question 17: DPP communication

Answer: Agree.

There is a need to provide information to disabled passengers when that person is considering booking a journey. More information regarding accessibility is needed at the planning a journey stage.

Question 18: Station accessibility at a glance

Answer: Agree.

There needs to be common format for describing the facilities, if possible with the use of standard symbols. Operators need to highlight inaccessible features and make reference to local sources for advice and assistance.

Question 19: Individual station information

Answer: Agree.

Under reference to the answer given to question 18. Disabled people need to have this information before booking a train - ie via an accessible website.

Question 20: Rolling stock overview

Answer: Agree.

Operators should provide information on the type of rolling stock in use on specific routes, highlighting the facilities they do or do not provide.

Question 21: Planned improvements

Answer: Agree.

Operators should commit themselves to improve accessibility of trains and stations, showing the relationship between them, and publicising a specific programme and timeframe.

Question 22: Sample DPP?

Answer: Agree.

Question 23: Useful to disabled people?

Answer: Agree.

Also, each station should have its accessibility checked by an Access Panel (or similar group or access auditor) and be given an accessibility rating. The DPPP needs to be clear about difficulties and drawbacks.

Question 24: Headings and order in the DPPPs

Answer: Agree.

This is likely to be helpful to disabled passengers.

Question 25: The same text

Answer: Agree.

Some flexibility is allowable to account for differences and additional commitments but needs to be an honest statement of the position by each operator and be clear about drawbacks such as inaccessible stations, unstaffed stations and halts, outdated rolling stock, poor toilet facilities etc. The document should avoid giving the impression that planned improvements have already taken place and should state honestly that some stations are not advised for some disabled passengers.

Question 26: Impact assessment

Answer: Agree.

It is thought that any increase in operating costs as a result of the proposed guidance will be minimal in relation to the overall operating costs of the operators.

End

22 May 2008