

Iain Stewart MP  
Chair of the Transport Select Committee

By email

11 October 2023

Dear ,

Following my attendance at the Transport Select Committee on 13 September 2023, I am writing in response to your letter dated 19 September with requests for clarification and further information.

My response below covers the questions specifically asked of Chiltern Railways. Rail Delivery Group (RDG) is responding to questions 1 and 3 which cover the wider industry themes.

I hope the response provides the detail you need to understand Chiltern's approach to the consultation on general accessibility and impact assessments.

To address the following statement from the TSC please find our response below:

**Transport for All reported that when the consultations were initially launched, both Chiltern and Avanti only made their proposal documents available in braille and large print available on request, with no EasyRead, audio or British Sign Language (BSL) versions; LNER meanwhile had EasyRead and audio version on their website.**

**Response:** The guidance from Rail Delivery Group (RDG) before the launch of the consultation on alternative formats was that Train Operating Companies (TOCs) should follow the same process for providing alternatives as they would for customer information on engineering works or industrial action. We sought further guidance from the passenger bodies, Transport Focus and London TravelWatch, and, on advice, initially provided all our consultation documents in the formats below - they were deemed satisfactory by both RDG and the passenger bodies.

- Braille
- Large Print
- Plain text
- Accessibility tool (Recite) available on our website, which provides translation into different languages, and alternative formats/fonts including large print and colour themes.

RDG later provided further guidance to all TOCs to widen the alternative formats to include audio and EasyRead on request as a mandatory requirement, and BSL as optional. We added the audio

format on 21 July, before the announcement of the consultation extension. RDG provided guidance to all TOCs on 10 August to include the EasyRead on request, this was added during w/c 21 August due to translation lead times.

The BSL format was optional, and following feedback from our accessibility group, the provision of formats for Chiltern was deemed sufficient. However, we have made it clear that we will provide a reasonable adjustment to satisfy a request. There were no requests for BSL translation.

**1. Why were proposal documents not made available in a) consistent formats across all operators and b) all accessible formats from day one by all operators?**

Rail Delivery Group to answer.

**2. How did you involve disabled people in your Equality Impact Assessments?**

The industry instruction to all TOCs was not to share any information with stakeholders before the start of the public consultation. Based on the guidance, our Accessibility Manager used insight from the Chiltern Railways Accessibility Group (CRAG) to aid with the completion of our Equality Impact Assessments (EqIAs).

The public consultation launched on 5 July, and we shared our detailed proposals with our Accessibility Group at their earliest availability, which was on 14 July 2023.

We had conversations and correspondence with the group members to ensure we had captured everything we needed to complete comprehensive EqIAs for each location affected by the proposals. The detailed EqIAs were available on request from 5 July and were published on our website on 14 July following RDG guidance to all TOCs to publish.

**3. [To Mr Moorhead:] What advice did the Rail Delivery Group give to operators about involving disabled people in Equality Impact Assessments of their proposals?**

Rail Delivery Group to answer.

**4. What work has your organisation done directly with disabled people's organisations to understand the impact of the proposals?**

Some members of our accessibility group represent organisations for people with disabilities including My Life, My Choice and Spinal Injuries Association, and had full sight of our proposal and the completed EqIAs for review. They also advised on suitable formats for our consultation documents.

We will continue to work with our accessibility group to refine our proposals to create a more accessible rail network and for them to have a say in how our accessibility policy is shaped.

**5. The ORR wrote to all operators in July asking them to review their proposals against Accessible Travel Policy guidance. Has this intervention changed any of your organisation's thinking?**

Our proposals are to transition station team members from working in ticket office windows to multi-skilled 'customer help' roles at 20 of our 23 staffed stations. There are three stations where this way of working is in place already - Bicester Village, Oxford Parkway and Aylesbury stations – and we are not proposing to make any changes at those locations.

Our proposals to move colleagues from behind the ticket office glass window into the public areas of stations are intended to provide customers with more visible support and reassurance. We would continue to have available the ticket issuing system that we use in our ticket offices – this device is

portable so we intend to have it available to use in a reception desk area that we believe would be required in each station concourse to provide a focal point for colleagues and customers.

Our proposals are to move to this way of working at 20 stations over a three-year period, subject to being able to invest in the physical changes needed to modernise the station concourse environment, improve the functionality of ticket machines (and in some cases provide more machines) and provide appropriate training for colleagues. Under our proposals, the current hours of operation of each station and the hours when colleagues are available would remain the same as today.

We have reviewed our proposals against the Accessible Travel Policy (ATP) and believe that their implementation would mean that Chiltern would meet the ATP guidance, for the reasons outlined above.

Please let me know if you require further clarification or have any questions.

Kind regards

A handwritten signature in black ink that reads "Richard". The script is cursive and fluid.

**Richard Allan**

Managing Director, Chiltern Railways