

11 October 2023

Iain Stewart MP
Chair of the Transport Select Committee
House of Commons
London
SW1A 0AA

Dear Mr Stewart,

Thank you for the opportunity to give evidence at the Committee's session on 13 September and your follow up letter dated 19 September. Please find below information on Avanti West Coast's (AWC's) approach to accessible travel, followed by responses to your questions.

It is important for the rail industry to change the way it retails tickets as customer behaviour has evolved over the last three decades. There is significantly reduced usage of ticket offices over the past decade as customers move to alternative, more convenient ways of buying tickets.

The aim of the proposed changes to ticket offices is to move our colleagues from behind the counter to more public areas of stations to be on hand to help customers, creating a more visible presence at our stations, and more staff on hand to give face-to-face help.

All ticket types will remain available at all our stations, there will be no changes to Avanti West Coast station staffing hours and our stations will continue to be staffed from the first train to last train. Passenger Assist will still be available for booked and unbooked journeys.

We also understand that our customers have differing needs which is why we have been consulting with accessibility groups on this consultation. Like other train operators, we have produced Equality Impact Assessments (EIAs) for each station proposal which help to identify any potential impacts and mitigations.

AWC is committed to improving the experience for people with disabilities when travelling by train. We have already taken a range of steps to support passengers with accessibility needs:

- Based on previous feedback, we have already made improvements to Ticket Vending Machines, ensuring these have a modern design, mindful of accessibility requirements. These include changing the buying process to make it more straightforward, with a less "busy" screen. We have also made improvements for wheelchair users to ensure the action buttons are on the bottom half of the screen.
- We have continued to make improvements to our Passenger Assist service, for example launching a staff app for live status on Passenger Assist, thus increasing reliability. At 12 of our 16 stations, the Passenger Assistance meeting point is currently the ticket office. We have already created a plan for changes to meeting points that will include consistent signage, seating and help points where needed. If there are no available staff in these areas, a call button will be included to ensure customers can always access staff from this meeting point
- The designs of our new Hitachi fleet and refurbished Pendolino fleet have incorporated several important improvements, for example changing wheelchair spaces to make them more visible, discouraging customers from placing luggage in these dedicated spaces, plugs for charging

powerchairs and scooters and a passenger detection system to indicate to staff if wheelchair spaces have luggage in them.

- In 2021, we became the first train operator to be awarded Shaw Trust Web Accreditation – a mark confirming our website has been tested by people with a wide range of disabilities and found to meet Web Content Accessibility Guidelines (WCAG). Our website is then reassessed every month.
- Travel Companion is a dedicated communications channel using WhatsApp to provide disabled customers with specialist help during their journey. Our industry-first accessible Facebook group was launched in 2021 and allows members to communicate with each other and have questions answered relating to accessible travel, and we share the latest industry updates.
- We have partnered with technology provider, Be My Eyes, to support visually impaired customers through an app that offers video support at a moment's notice from sighted volunteers and professionals who can view customers' surroundings through their phone's rear facing camera.
- Goodmaps digital wayfinding is already in place at London Euston, Birmingham New Street, Liverpool Lime Street and Manchester Piccadilly, and will be at Rugby, Crewe and Stoke in November, with the rest of our stations to follow in the following months. This app allows visually impaired customers to navigate stations independently.
- We have completed work on Changing Places toilets at 5 of our 16 stations with at least another one to be completed by the end of the financial year. We are currently completing feasibility studies for another five stations.

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?

AWC cannot answer for other operators, nor on the behalf of industry. We wanted to make sure that all customers were able to give feedback on the consultation, so provided consultation details for our customers in the following formats:

- **Posters (at stations)** – in place from start of the consultation and updated following extension of consultation.
- **Online (website)** – in place from start of the consultation.
- **Web accessible digital** – in place from start of the consultation.
- **Large print** – available at stations and by request from start of the consultation. Available through accessibility tools on our website from end of July. Updated following extension of consultation.
- **Braille** – available at stations and by request from start of the consultation. Updated following extension of consultation.
- **Easy read** – available by request from start of the consultation and to download from our website by the end of July.
- **Printed leaflets at station** – available by request from start of the consultation.
- **Word version plain text** – available via accessibility tools on website from start of the consultation.
- **British Sign Language** – available by request from start of the consultation.
- **Audio** – available via accessibility tools on website from start of the consultation.
- **Passenger Assist Emails** – we sent consultation details to all passenger assistance users for whom we had an email address from the prior seven weeks, to make sure they were aware and able to comment.

During the consultation period, AWC received five requests from the public relating to accessible formats, all for either Braille or large print, and these were sent out within one working day.

2. [To Mr Horne, Mr Mellors and Mr Allan:] How did you involve disabled people in your Equality Impact Assessments?

We are committed to talking to our disabled customers so they can help shape change. To support this, we proactively manage a national and seven regional engagement panels to ensure accessibility groups have their say. We have been working with them to make sure any changes are inclusive, as well making sure they are satisfied we are doing everything we can to make rail accessible for all.

The EIAs are intended for the industry to use as ‘living documents’ – which means they are updated across the course of this project as feedback and decisions evolve. In line with this industry approach, AWC EIA progress to date:

- 5 July - First EIA produced by AWC and subsequently sent to Transport Focus and London TravelWatch.
- 19 July – The EIA was updated following feedback from our Accessibility Panel and uploaded to the AWC website. Changes included feedback on queues at busy stations, TVMs and retail processes.
- 14 August – Individual station EIAs produced, taking further feedback into account and uploaded to the AWC website.
- 27 September – Further feedback from regional accessibility panels included as well as potential issues and mitigations for customers with non-visible disabilities. All station specific EIAs updated on the AWC website.

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?

Answer to be provided by Rail Delivery Group.

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

Disabled people’s organisations play a vital role in influencing the work of our disability panels. We have panel members from organisations such as Guide Dogs, Disability Rights UK, Disability Equality and Direct Access, alongside disability rights campaigners and customers with specific knowledge of our stations.

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?

We work collaboratively with the ORR and welcomed this opportunity. We explained in our response to the ORR that, in line with the ATP guidance, AWC stations would remain staffed from first to last train, Passenger Assist will still be available for booked and unbooked journeys, including for Turn Up and Go assistance; and all tickets would be available via our Ticket Vending Machines or Customer Ambassador using a handheld device.

As I stated at the Committee's session on 13 September, AWC's existing Accessible Travel Policy already includes the provision that if it is difficult for a passenger to buy a ticket before they travel due to a disability, they will be able to buy tickets on board the train or at their destination and receive any fare reductions that they are entitled to and won't be penalised for travelling without a ticket.

If there is any further information on AWC approach to this issue that you would like me to provide, please do let me know.

Yours sincerely,



Andy Mellors
Managing Director
Avanti West Coast