



## **Accessibility Action Plan Consultation** **November 2017**

1. The Associated Society of Locomotive Engineers and Firemen (ASLEF) is the UK's largest train driver's union representing approximately 20,000 members in train operating companies and freight companies as well as London Underground and light rail systems.
2. ASLEF is glad to have this opportunity to respond to the Accessibility Action Plan. The union believes that rail must be seen primarily as a public service. For it to be a genuine public service it must be accessible to all. Much of our railway is aging, with a great deal of our network still relying on Victorian infrastructure which predates train design and technology built to accommodate passengers with wheelchairs and prams, for example. This means making the railway accessible for disabled people is challenging. However, in the 21<sup>st</sup> century, there can be no excuses for people with disabilities not being able to use services, yet that continues to be the case far too often. This is predominantly down to three reasons: Stations access, rolling stock access and staffing.
3. The consultation points out that currently, "75% of all passenger rail vehicles in Great Britain (a total of over 12,300 vehicles) have been built, or fully refurbished, to modern access standards. This is an increase of 25% since the 2012 Accessibility Action Plan." Whilst this is good progress, there are huge regional variations. Rolling stock age and accessibility can be dramatically different by operator. For example, on Great Western, rolling stock is an average of about 32 years old. Stock on TransPennine Express is only about 10 years old on average. The national

picture is of no use for a disabled person if the service they need to use is operated by stock which they cannot use.

4. Good and accessible communication is essential in enabling people with disabilities to travel without hindrance. Audio announcements must always be clear for those with visual impairments. Much of our rolling stock doesn't have visual displays for passenger information, and where passenger information displays are available they often fail to supply up-to-date information. This would be easy to rectify, and could improve the situation for many.
5. In addition, station accessibility is extremely variable. One of the key issues is step-free access. Investment has been made since the launch of the Access for All scheme in 2005. Between 2005 and 2020 the percentage of passengers using step-free stations will have risen from 55%-81%.
6. Yet there remains a wide variation across our network. Arriva Trains Wales has 61% of stations with step-free access to all platforms, but Thameslink/Great Northern has only 28%. The study carried out for the Department for Transport in 2015 which found that 33% of wheelchair users, 19% of hearing impaired passengers and 15% of mobility impaired passengers, made more journeys following station improvements, proves that station accessibility is a genuine hindrance to disabled passengers, and is preventing them from exercising their right to travel on our network.
7. One of the other major barriers is the interface between platform and train. Again, there is significant variation in platform dimensions across the network, and therefore the height of the step up to the train. Steps as high as 40cm are not uncommon. The degree of variation in platform height is often problematic in improving train design.

8. Issues that affect passengers' ease of travel do not only arise at the time of their departure and arrival at stations. Issues arise if people are asked to alight services early due to a variety of operational reasons (e.g. if a train terminates at a different station than originally planned, which doesn't have wheelchair access). Additionally, services are often advertised to depart from one platform, only for this to change at late notice. This can be a major problem for disabled passengers who don't hear the announcement or can't get to the other platform in time.
  
9. This is why the availability of staff is so essential to accessibility. ASLEF believes there should be no extension of services that are rostered without a safety trained second member of staff on board. It is not right that disabled people should have to contact operators in advance to tell them they wish to travel. To have genuine accessibility and equality, people with mobility issues should be able to turn up and travel in the same way as any other passenger. Operators must also proactively plan for unforeseen circumstances. Too often when services are disrupted due to poor weather conditions, or infrastructure failure, people with disabilities do not receive enough assistance and get lost or stuck because they don't know where to go and cannot hear announcements or get on board services. Having more staff who are appropriately trained would provide far better assistance in these circumstances.
  
10. As previously mentioned, our infrastructure is an obstacle to this happening. But with the correct level of trained staff on board services and on platforms, we can overcome many of these problems. Removing station staff and second members of staff from services simply exacerbates the situation. Many of the improvements in regards to accessibility have not come from within the industry itself, but have been forced upon the operators by European legislation. It would therefore be good to see operators taking a pro-active approach to disability access rather than being reactive. A good way to achieve this would be to commit to no

reduction in rostered second safety trained staff on board services and ensure adequate staffing levels on platforms.

11. For too long, access for those with disabilities has been treated in a reactive way by our industry. Something that operators deal with when they are forced to legally. It is time for a proactive response that recognises that where there are barriers to access, removing them wherever possible must be considered a priority, whether this is done through improvements to rolling stock, stations, staffing levels or all three.

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