



National Union of Rail Maritime and Transport Workers



Baroness Falkner of Margravine
Chair, Equality and Human Rights Commission
Windsor House
50 Victoria Street
London
SW1H 0TL

By email to: correspondence@equalityhumanrights.com

27.09.22

Dear Lady Falkner,

Railway staffing and accessibility

I am writing to you regarding the impact of transport policies on the accessibility of the rail network. As you may be aware, it has been widely reported that the Government and rail industry are intending to close the vast majority of ticket offices, and the Government has also stated publicly that it intends to recommence the roll out of Driver Only Operation (DOO) across the network.

RMT believes that if these policies are enacted, it will undoubtedly lead to a wider de-staffing of the rail network and that this will further restrict disabled and elderly people's access to the railway.

Issues around the impact of transport staffing policies on accessibility are, of course, not new. In February 2019, the then Chair of the EHRC David Isaac made a significant contribution to this debate when he wrote to the Chair of the Transport Select Committee on rail staffing and accessibility and stated that:

"...the impact of ongoing transport policies remains a concern, in particular the move to driver only operated (DOO) trains, as well as reductions in staffed stations. We believe that the shift to DOO trains, with the increased likelihood of there being no second member of staff on board to assist passengers, and a decrease in staffed stations could represent a diminution of protection for disabled people, and potentially be a breach of the Equality Act 2010."

As long ago as 2016, the Government's Disabled Persons' Transport Advisory Committee (DPTAC) warned the Government about the 'toxic combination' of DOO operated trains and unstaffed stations. More recently, a document published by DPTAC in July 2022 'Rail Workforce Reform Report', which studied part of the Govia Thameslink Railway (GTR) route, again found that this 'toxic combination' meant 'many disabled people are excluded from using the Route to access employment, services, leisure and health facilities'. It went on to say that the 'DfT needs a change of strategic approach if the Route is to be made accessible to all people'.

Furthermore, it was recently reported via a leaked document that the operator Govia Thameslink Railway (GTR) had indeed admitted that it was in breach of its equality law obligations due to insufficient staffing levels.

As you may be aware, during 2020, the RMT worked with the EHRC as part of its work on access to transport, including running a focus group of station and on-train staff and we welcomed this

opportunity to help inform the Commission's understanding of the role staff play in making the railway accessible. I would be grateful for an update on the Commission's work in this area.

Furthermore, given the significant threat to the accessibility of the rail network of current Government and rail industry policy, I would be grateful if you could advise the following:

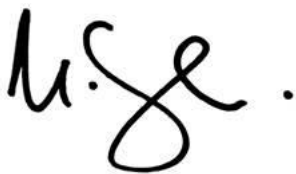
- What steps the EHRC is taking to investigate GTR's admission that it has been in breach of its equality duties as a result of inadequate staffing levels?
- If you believe that (a) the widespread closure of ticket offices and (b) a further roll-out of DOO would (i) worsen the accessibility of the rail network for disabled and elderly people and (ii) potentially mean that rail operators were in breach of equality legislation?
- What representations the EHRC has made to the Government and rail operators about the impact of de-staffing, ticket office closures and DOO, on the ability of rail operators to meet their equality duties?

I hope you'll agree that the potential impacts of railway de-staffing and current transport policies on disabled and elderly people are likely to be significant. In light of this, we would welcome it if the EHRC were to urgently investigate these matters and the extent to which a widespread closure of ticket offices and further roll out of DOO could hinder train operators' abilities to meet their legal duties under equalities legislation.

I would be happy to discuss these details with the EHRC in more detail.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M. Lynch', followed by a period.

Michael Lynch
General Secretary