

**Appendix C – Submissions from trade unions, MPs, London Assembly Members, Local Authorities, councillors, rail user groups and a business:**

Barking to Gospel Oak Rail User Group  
Belsize and Hampstead Town Labour Party Branch  
Cllr Bell, LB Lewisham  
Cllr Bell, Watford Labour Group  
Cllr Brabazon, LB Haringey  
Cllr Chan, LB Brent  
Cllr Coelho, LB Richmond upon Thames  
Cllrs Cox, J King and S King, Three Rivers District Council  
Cllr Cryan, LB Southwark  
Cllr Davis, LB Lewisham  
Cllr Demirci, LB Hackney  
Cllr Dogan, LB Enfield  
Cllr Durant, LB Havering  
Cllr Gallagher, LB Lewisham  
Cllr Gordon, LB Haringey  
Cllr Hall, LB Lewisham  
Cllr Huntington-Thresher, LB Bromley  
Cllr Mahmood, LB Brent  
Cllr Mehrban, LB Hounslow  
Cllr Napier, Dover District Council  
Cllr Odell, LB Harrow  
Cllrs Sorba and Bell, LB Lewisham  
Cllr Tatler, LB Brent  
Cllr Webbe, LB Islington  
Cllr Williams, LB Southwark  
Florence Eshalomi AM, London Assembly Labour Group  
Hackney Pensioners Convention  
Joan Ryan, MP for Enfield North  
Kate Osamor, MP for Edmonton  
Lewisham Council  
Peter Taylor, Mayor of Watford  
Railfuture  
RMT  
South East Rail Group  
St Katherine's and Wapping Labour Party  
Tottenham Hotspur FC  
Tottenham Hotspur Supporters Trust  
Transport for All  
TSSA  
West Hampstead Amenity and Transport

**Petitions were also received regarding/from:**

Carpenders Park station  
Honor Oak Park station  
RMT  
West Hampstead Amenity and Transport



## **Planned closure of ticket offices at 51 London Overground stations**

### **Comments by Barking – Gospel Oak Rail User Group**

#### Introduction

1. This proposal by Arriva Rail London on behalf of Transport for London directly affects the Barking – Gospel Oak line only in respect of Gospel Oak station. This is because other stations on the line already have no ticket offices, apart from Barking where the ticket office is operated by c2c.
2. We have no objection in principle to the closure of Gospel Oak booking office provided the commitment to provide staff at the station from 15 minutes before the first train until 15 minutes after the last train is maintained.
3. However we believe that conditions in respect of the following matters should be imposed, and that these conditions should be standardised across all London Overground stations, **including those which already have no ticket office.**

#### Walk-up tickets

4. As well as full facilities for Oyster and Contactless, every station's ticket machines should be capable of issuing (for cash and for card payment) -
  - Tickets from that station to all stations on the National Rail and TfL networks
  - Tickets from any other station on the National Rail network to all stations on the National Rail network
  - Tickets / Travelcard extensions from all Boundary Zones to all stations to which such fares are available (mainly LUL and former Network South-East stations)
  - Tickets for the current day
  - Tickets for journeys commencing on any day up to four weeks ahead
  - Season tickets
5. In respect of the above we have examined in detail new ticket machines (of two different designs) recently installed at Gospel Oak and Upper Holloway, and find that these provide all the facilities listed.
6. We therefore recommend that, where not already installed, ticket machines of these types should be provided at all London Overground stations.

7. One issue for improvement with both designs of machine is that where tickets with limited route availability are offered (i.e. not Route Any Permitted), limited display space means the actual route allowed can only be read by selecting that particular ticket. Whilst this does not commit the passenger to buying that ticket, it does make the process of selection slow and cumbersome as it necessary to click back and forth between screens before deciding what to purchase. We therefore recommend that where the full route is not at present displayed within the initial display, that this be modified to allow the full route to scroll across.

#### Advance Purchase tickets

8. We note that the new design machines do not offer Advance Purchase (AP) tickets. We doubt that it would be desirable for them to do so, because the need for passengers to consider multiple choices of times, days, and fares would result in very long transaction times which would disadvantage other people waiting to use the machines.
9. Instead we consider that station staff should be provided with full information on their electronic devices to enable them to give correct advice about which telephone and non-fee charging websites passengers can use to buy AP tickets. It would be helpful for the station ticket machines to be modified so that for any journey for which AP tickets are offered this information is displayed with advice to ask staff for details of how to buy them.

#### Refunds / Delay Compensation

10. Station staff must be able to provide passengers with accurate advice on how to obtain refunds for unused tickets (including any administrative fees) and how to obtain delay compensation.

#### Recent Refunds

11. In the particular case where passengers buy a ticket (or click-in on Oyster or Contactless) and then decide not to travel because they find there is a delay to the service, station staff must be able (as a ticket office can at present) to give an immediate refund on request by whatever means the passenger paid for the ticket.

#### Railcards on Oyster

12. Station staff should have the facility to load Railcard details onto an Oyster card, as already applies on LUL.

**From:** Gail Brackett <gailbrackett@hotmail.com>  
**Sent:** 08 October 2018 20:51  
**To:** Consultations  
**Subject:** Overground Ticket Office Closures

Dear Sir/Madam,

Transport for London has plans to close virtually all ticket offices at all stations on the London Overground.

This would cause considerable inconvenience to people needing to buy tickets and those seeking information from station staff.

We demand that the mayor and TfL put a stop to this inappropriate and unnecessary proposal.

Yours faithfully,

Gail Brackett,

Branch Secretary

on behalf of Belsize and Hampstead Town Branch

Hampstead and Kilburn Constituency Labour Party



**From:** CLLr\_paul.bell@lewisham.gov.uk  
**Sent:** 25 September 2018 10:18  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that I

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
CLlr paul bell

To London TravelWatch,

**Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations**

I write to you on behalf of Watford Constituency Labour Party and that our party understands that Arriva Rail London and TFL are planning to close ticket offices in stations on the Overground network.

Although we welcome the opportunity to express our views on whether we would like these ticket offices to remain open or not. We are steadfastly opposed to the proposed closure of ticket offices at Carpenders Park and Watford High Street.

Our party believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Local indicators show that a clear majority of our constituents still prefer to buy from the ticket office rather than from a ticket machine. Both stations service a diverse group of passengers with differing needs. Watford High Street in particular, is widely used to service our local premier league football club which attracts large numbers of both home and away crowds.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly cause potential risks to staff and passengers in overcrowded situations such as Saturday afternoon football.

If these changes go ahead we believe that Watford residents would experience more delays and concourse congestion and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling.

Both Carpenders Park and Watford High Street are isolated platforms and that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take our concerns into consideration when considering this statutory consultation.

Yours sincerely

Nigel Bell

Leader Watford Labour Group

**From:** Cllr Brabazon Zena <Zena.Brabazon@haringey.gov.uk>  
**Sent:** 11 October 2018 20:39  
**To:** Consultations  
**Subject:** White Hart Lane and Bruce Grove Station loss of staff

Dear Travel Watch

I am writing to respond to the consultation regarding removing staff from several London Overground stations. I am deeply opposed to this, as I believe staff are needed to support travellers. They provide safety and security. In particular, I oppose the loss of staff at both White Hart Lane and Bruce Grove stations. My concerns relates to everyday travel, but especially to the times when Tottenham Hotspur will be playing home games and when they host large events and gigs. The new stadium has 62000 capacity – a huge increase on the previous 38,000. This will place huge pressure on all transport services and I doubt that the extended White Hart Lane or Bruce Grove stations will be immune from this. Having staff at the stations during these times is vital for public safety . Please retain staff at these stations.

Zena Brabazon

**Cllr Zena Brabazon**  
**Labour Member for Haringay Ward**  
**Cabinet Member for Civic Services**

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**From:** chan.jun.bo@gmail.com  
**Sent:** 10 October 2018 19:54  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that I

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
Cllr Jumbo Chan

**From:** Coelho, Avril (Cllr) <Cllr.A.Coelho@richmond.gov.uk>  
**Sent:** 02 October 2018 20:20  
**To:** Consultations  
**Cc:** Ehmann, Alexander (Cllr); Roberts, Gareth (Cllr)  
**Subject:** Ticket office closures consultation

Dear London Travelwatch,

I would like to add the following comment to the consultation on the closure of overground ticket offices:

Those of us who have a Disabled person's freedom pass are covered for some of our train journey and only need to purchase mainline extension tickets. The ticket machines do not tell us which station on each journey is the cut off for the freedom pass and where the Disabled person's railcard journey should commence from and return to. We rely on ticket office staff for this. There are rare occasions when ticket office staff don't know and staff near the machines if the office is closed don't know either and we end up paying extra unnecessarily. For most journeys however, we rely on ticket offices to purchase the correct tickets and not pay an unnecessary extra overlap in journey fare when the freedom pass covers part of the journey already and the railcard should be used to purchase a ticket for only part of the journey whether one way or return. I implore you not to close these for the many people who rely on public transport due to disabilities therefore live and travel in cities like London.

My response is both in a personal capacity and as an executive officer of the Lib Dem Disability Association.

I have copied in our borough cabinet member for Transport, Highways and Air Pollution Cllr Ehmann.

I have also emailed the other way copying in Caroline Pidgeon who is my GLA Transport Committee representative.

Kind regards,

Cllr Avril Coelho  
Hampton North ward  
[Cllr.A.Coelho@richmond.gov.uk](mailto:Cllr.A.Coelho@richmond.gov.uk)

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**From:** Cryan, Stephanie <Stephanie.Cryan@southwark.gov.uk>  
**Sent:** 04 October 2018 17:30  
**To:** Consultations  
**Subject:** Proposed closure of ticket offices at Rotherhithe and Surrey Quays Stations

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations, including Rotherhithe and Surrey Quays in my ward. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, **Rotherhithe**, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, **Surrey Quays**, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that residents I represent:

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Rotherhithe and Surrey Quays stations are due to see an increase in use with the planned regeneration at Canada Water. The Mayflower 2020 celebrations will see an increase in tourist visits predominantly using Rotherhithe station and there will be an increased demand for a ticket office.

Please take my concerns into consideration when considering this statutory consultation.

CLlr Stephanie Cryan  
Cabinet Member for Housing Management and Modernisation  
Labour and Co-operative Party Member for Rotherhithe Ward.

Tel: 020 7525 0247  
Mob: 07985116251

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**From:** CLLR\_sophie.davis@lewisham.gov.uk  
**Sent:** 09 October 2018 14:43  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

I believe these are damaging and detrimental cuts and that there is still a clear need for staffed ticket offices at stations. Industry research shows that a clear majority of passengers still prefer to buy from the ticket office rather than from a ticket machine.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

If these changes go ahead I believe that I

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
SOPHIE DAVIS



**From:** Feryal Demirci <feryal.demirci@hackney.gov.uk>  
**Sent:** 12 October 2018 15:53  
**To:** Consultations  
**Subject:** London Overground Ticket office closure

Dear London Travelwatch

I write in connection with the above proposals on behalf of London Borough Hackney.

We believe if public transport is to be promoted across London to meet Mayor of London's transport aspirations, then the entrance to the station has to be the focal point to the start of the journey. Linked to that are concerns over safety, of our residents and the LO staff. Visibility of staff provides reassurance that the Overground is a safe place to travel. At present staff in ticket offices provide this visibility and my Council would object to any measures which (directly or indirectly) reduce this as the current proposals would seem to imply. No information is supplied on staffing levels for stations in Hackney - current and proposed.

With the exception of London Fields, all the Council's stations have ticket offices. We are aware that Stamford Hill has been closed due to structural issues and this has resulted in queues building up at times for the ticket machines. We fear that with further closures this could become the norm at other stations.

As well as issuing the full range of tickets, ticket offices can also deal with the issuing of annual season tickets, refund Oyster deposits and unused credit and top up Oyster credits for small amounts. This is important to many on low wages. Ticket offices can also print out Oyster journey histories. With the closure of the ticket offices these facilities will be lost.

Although it is accepted that the self-service ticket machines used on London Overground do issue a full range of tickets (including to any NR station) and zone boundary extensions to many groups such as people with disabilities (some not apparent) these are still difficult to use. Our Mayor Philip Glanville and I would wish to receive assurances with any changes that there would be staff on hand at all times to offer assistance with their use.

#### Annual Season Tickets

Although it is accepted that the popularity of Oyster products has reduced demand for annual season tickets, a sizeable number of passengers nevertheless still use these. In addition LO ticket offices sell 'point to point' annual tickets. With the closure of ticket offices on the London Underground the only place to purchase these (other than on-line) is at a ticket office or at a Visitor Centre. There are none of these in Hackney. I would therefore ask how it is proposed to deal with this issue ?

#### Staffing

The proposals state that London Overground operates with a staffing model that guarantees that a member of staff will be on each managed station. There is no information to suggest at what times the stations have more staff. One member of staff alone would not be able to deal with gateline problems, assistance with passengers and help with buying a ticket. The proposals need to explain how this would be mitigated.

#### Reliability of gatelines

Although information on unscheduled booking office closures and ticket machine performance has been submitted no information is supplied on reliability of the gatelines. It is often the case that these break down (Hackney Central being an example) and dangerous levels of overcrowding at several of our stations means diverting staff to dealing with these issues would take them away from the ticket machines where they would be assisting passengers. How would this problem be addressed ?

### Ticket machine availability

The proposals refer to reliability issues with the ticket machines and that two types are in use. It is mentioned that at least one of each type will be installed at each location. We would point out that this is not the case at present in all locations.

### Booking hall congestion

At a number of locations the booking office spaces are cramped and congestion regularly occurs on the concourse. The location of the existing booking offices allows for the queues to be managed. The proposals do not show any plans for the location of any additional ticket machines and what future use will be made of the redundant space. The Council would suggest, as a pre-requisite that if the closures go ahead that these should be linked to a programme of improvements to help passenger flows and that machines should not be located in proximity to gatelines where these could restrict entry and exits.

In conclusion, the Council considers that these proposals, as currently submitted lack detail and the necessary information for proper assessment. Unless these issues can all be satisfactorily addressed the Council must formally object to them.

Yours sincerely

Cllr Feryal Demirci  
Deputy Mayor and Cabinet Member for Health, Social Care, Transport and Parks  
Labour Councillor - Hoxton East & Shoreditch  
Tel: 020 8356 3270  
Email: [feryal.demirci@hackney.gov.uk](mailto:feryal.demirci@hackney.gov.uk)

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Cllr Feryal Demirci  
Deputy Mayor and Cabinet Member for Health, Social Care, Transport and Parks  
Labour Councillor - Hoxton East & Shoreditch  
Tel: 020 8356 3270  
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By email to:

[enquiries@londontravelwatch.org.uk](mailto:enquiries@londontravelwatch.org.uk)

Please reply to: Dominic Millen  
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Silver Street

Enfield  
EN1 3XD

E-mail : [dominic.millen@enfield.gov.uk](mailto:dominic.millen@enfield.gov.uk)

My Ref LBE Response to LO Closures

Date : 24/09/2019

### **London Overground Proposals to Change Station Ticket Office Provision**

This response is made on behalf of the London Borough of Enfield whose residents will be affected by the proposed changes at Bush Hill Park, Silver Street, Southbury and Turkey Street stations.

Whilst there is a clear rationale behind the changes, which involve a number of ticket office closures, alongside the installation of additional ticket vending machines and continued staffing of stations, LB Enfield residents have concerns about:

- The availability of non-standard ticketing products, for example rail cards, which cannot be purchased online or via automatic ticket machines.
- The reduction in overall staffing levels at stations and any resultant drop in customer service levels.
- How the station staff will prioritise their work; for example, on a busy station a customer might require assistance to board a train, whilst another needs a ticket for immediate travel.

Given that these proposals are still in the early stages, prior to any firm commitment, we would expect there to be extensive local consultation to better understand if the proposals are appropriate in a particular location.

Yours faithfully

Councillor Guney Dogan

Cabinet Member for Environment, London Borough of Enfield

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**From:** david.durant@haverling.gov.uk  
**Sent:** 01 October 2018 09:41  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

in general I think it a mistake to remove the personal touch from our public services and doing so can be a false economy, particularly if there is no particular need to do so, after I was informed by an auditor that tlf have over £11 billion in reserves.

I would also point out that since buses went cashless there is now over a massive amount of credit on oyster cards (over £100m) that is carried over every year. ways should be found to access this credit.

Sincerely  
Cllr David Durant

**From:** CLLR\_AISLING.GALLAGHER@LEWISHAM.GOV.UK  
**Sent:** 01 October 2018 14:42  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

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Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will undoubtedly limit the quality and range of services available to passengers.

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- would experience more delays and concourse congestion;
- and others who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
CLLR AISLING GALLAGHER

**From:** Cllr Gordon Ruth <Ruth.Gordon@haringey.gov.uk>  
**Sent:** 10 October 2018 17:39  
**To:** Consultations  
**Subject:** Proposed closure of ticket offices including Bruce Grove and White Hart Lane

Dear Sirs,

I wish to object to the proposed closure of ticket offices across London. I am a councillor in Haringey and in particular I want to press for the retention of the ticket offices at Bruce Grove and White Hart Lane Station.

The soon to be opened 62,000-seater stadium at White Hart Lane as the home for Tottenham Hotspurs is likely to create severe disruption to traffic in the Tottenham area. When matches (Premiership and NFL games) are due, Tottenham High Road and some other minor roads will be closed and fans are to be encouraged to use public transport. Bearing this in mind, I cannot perceive of a worse time to close ticket offices at these stations. Maintaining fully-staffed ticket offices at these stations is vital to the health and safety of passengers, given the anticipated overcrowding and high volume expected once the stadium opens.

I believe the proposed closure of these offices is short-sighted and foolhardy given the explosion of passengers traffic anticipated through these Tottenham stations.

Regards,

Ruth Gordon

Cllr Ruth Gordon  
Labour Member for Tottenham Hale Ward

Call Mobile: 07976974532 for appointments or

Email [Ruth.Gordon@haringey.gov.uk](mailto:Ruth.Gordon@haringey.gov.uk)

Surgeries: Every 4<sup>th</sup> Saturday in the month at Marcus Garvey Centre, 1 Philip Lane, Tottenham. N15; and every 3<sup>rd</sup> Saturday in the month (rota basis) The Engine Room, Unit A, Eagle Heights, Lebus Street, Tottenham N17.

"Whilst I will treat as confidential any personal information which you pass on, I will allow authorised staff to see the information if this is needed to help and advise you, and may pass all or some of the information to agencies or council officers if this is necessary to help your case. I may wish to write to you from time to time to keep you informed of related issues that you may find of interest. Please let me know if you do not wish to be contacted in this way."

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**From:** Cllr\_alan.Hall@lewisham.gov.uk  
**Sent:** 25 September 2018 09:34  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

I oppose the proposed closure of ticket offices at Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
Cllr Alan Hall



LONDON  
11 OCT 2018  
TRAVELWATCH

Councillor William Huntington-Thresher  
Portfolio Holder for the Environment & Community Services  
LONDON BOROUGH OF BROMLEY

London Travel Watch  
169 Union Street  
London, SE1 0LL

9<sup>th</sup> October 2018

Dear Sir/Madam

#### **London Overground Customer Service Modernisation**

The London Overground offers an important service to residents in the North West of the London Borough of Bromley and has been a success story in recent years.

As a Council we recognise that customers want high quality customer service and efficiency, but over time technology is changing the way we travel. I am therefore keen to see modernisation of the London Overground network to ensure that staff are where passengers need them most; so they can provide speedy assistance to passengers, particularly those with additional needs. So I support the proposals put forward by London Overground. However, mindful of some of the experiences on the London Underground network, I would like to receive more information please on the contingencies in place in the event of staff unavailability e.g. due to sickness, and additional infrastructure such as CCTV and call points.

I am mindful of the need to consider appropriate staffing at Crystal Palace for special events to ensure that it is appropriate for the volume of passengers coming to the area, perhaps for the first time, to a special event.

We will of course monitor the implementation of the modernisation programme and reserve the right to support residents should issues arise.

Yours sincerely

P.P. Cllr William Huntington-Thresher



LONDON  
09 OCT 2018  
TRAVELWATCH

## **Hackney Pensioners' Convention**

Chair – Paul Higgins, Secretary Nigel Gansell  
Treasurer – Jonathan Malins-Smith

For the attention of  
Campaigns Director,  
LONDON TRAVELWATCH,  
169 Union Street, SE1 OLL

October 6<sup>th</sup>, 2018.

Dear Campaigns Director,

### **RE PROPOSED CLOSURE OF 51 BOOKING OFFICES ON LONDON OVERGROUND BY ARRIVA LONDON /**

*The Convention, at its general meeting held earlier this month decided to back the campaign organised by RMT union to safeguard the guards on the Southern Trains network with a motion and support to Mick Cash, Gen Sec of RMT.*

*Unfortunately I was unaware of the planned closure of ticket offices on LONDON OVERGROUND until I read it the following day of our meeting in the ISLINGTON TRIBUNE newspaper.*

*I perused your website and spotted the Consultation procedures run by TRAVEL WATCH to oppose the proposals by ARRIVA LONDON.*

*I am unclear whether this letter will be enough to voice HPC concerns and to back your Campaign to keep the ticket offices fully open to the elderly, disabled etc.*

*Our Chair Mr Paul Higgins and myself have been railways fans and supporters over many many years. We are planning a general meeting in the New Year on local travel problems in LB of Hackney and pan-London etc. If you would like to support us and even attend our next meeting [ Leaflet is enclosed.] please let me know. Regards,*

Yours sincerely

Nigel Gansell Sec 0743 241 6084.



*ps. Do you have any stickers,  
Badges, you could supply  
us with?*

**From:** Cllr.arshad.mahmood@brent.gov.uk  
**Sent:** 25 September 2018 10:17  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

I understand that Arriva Rail London and TFL are planning to close ticket offices in a number of stations. I welcome this opportunity to express my views on whether I would like these ticket offices to remain open or not.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
Arshad

**From:** shaida.mehrban@hounslow.gov.uk  
**Sent:** 25 September 2018 10:36  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
Shaida Mehrban

**From:** Cllr-Ann.naPier@dover.gov.uk  
**Sent:** 27 September 2018 13:20  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
Cllr Ann Napier

**From:** Phillip.odell@harrow.gov.uk  
**Sent:** 25 September 2018 09:58  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 Overground stations

Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
Phillip odell

---

Ms Janet Cooke  
Chief Executive  
London TravelWatch  
169 Union Street  
London  
SE1 0LL

4 October 2018

Dear Ms Cooke,

There are four overground stations in Brent that will be adversely affected by the proposed ticket office closures; Brondesbury, Brondesbury Park, Kensal Rise and Kilburn High Road. This proposal will have an impact on Brent residents and workers.

The staff at London Underground stations play a crucial role in not only providing services, but invaluable assistance and support to commuters. I would also seek assurance that these proposals would not see a reduction in staff or a dilution of employee's terms and conditions. I would also need assurance that the support and assistance staff currently provide is maintained.

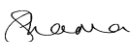
I am concerned over the timing of the proposed ticket office closures. While new Ticket Vending Machines (TVMs) will be rolled out at each location, it is not clear from the proposal whether the ticket office will be closed prior to, or after the TVMs have been installed. The lack of an operating ticket office and an available TVM means passengers travelling through these stations will not have access to the same level of service as passengers at other London stations with a ticket office available. This is unacceptable to Brent Council and Brent residents. It raises concern under the Equality Act 2010 to prevent and eliminate discrimination, promote equality and equal opportunities, and foster good relations between people with different protected characteristics. It's not unforeseeable that residents living near to one of the affected stations, who may have impaired mobility, would not be able to purchase certain ticket types without a ticket office or improved TVMs at these stations. Whilst we do support the principle that more than one type of TVM is proposed to ensure service is maintained at all times the current proposal would place these residents at an unacceptable disadvantage to residents near other London stations which have reliable TVMs and/or a ticket office.

For this reason, Brent Council is unable to support the ticket office closures until further detail on when the TVM programme and ticket office closures will take place.

I trust this response has been of some assistance, however if you have any questions, please feel free to contact our Transport Planning Manager, Rachel Best, on 020 9387 5249.

Thank you for your consideration.

Yours sincerely,



Cllr Shama Tatler  
Cabinet Member for Regeneration, Highways and Planning



# ISLINGTON

## **Councillor Claudia Webbe**

**Executive Member for Environment and Transport**

**Labour Member for Bunhill**



Ms Janet Cooke  
Chief Executive  
London TravelWatch  
c/o [consultations@londontravelwatch.org.uk](mailto:consultations@londontravelwatch.org.uk)

5<sup>th</sup> October 2018

Town Hall  
Upper Street  
London N1 2UD

**W** [www.islington.gov.uk](http://www.islington.gov.uk)

**PA:** Amanda Russell

**T:** 020 7527 3051

**E:** [Claudia.Webbe@Islington.gov.uk](mailto:Claudia.Webbe@Islington.gov.uk)

Dear Ms Cooke,

### **Re: Planned closure of ticket offices at London Overground stations**

I am writing to you as the Executive Member for Environment and Transport for Islington Council concerning the proposals by Arriva Rail London to close 51 ticket offices at London Overground stations across London.

Islington Council is committed to making our borough a fairer place for all. This includes working with Transport for London (TfL), the Mayor of London and others to deliver a transport network that is sustainable, accessible and genuinely affordable for all local people. Islington has led the way in championing the rights of disabled, elderly and more vulnerable people to be able to access London's transport network, most notably through our successful efforts to require TfL to fully consider equalities implications from proposed changes following the potential 8-month closure of Caledonian Road tube station in 2016.

Arriva's proposals, that are currently being consulted upon, would see the ticket offices at Canonbury Station and Caledonian Road & Barnsbury Station in Islington closed, affecting around 4.6 million passengers each year. Whilst Islington residents will also be affected by other ticket office closures across London, in particular on the Gospel Oak – Barking line, Richmond – Stratford line and Highbury & Islington – West Croydon line, my response to the consultation concentrates on the stations in Islington.

I am concerned that this further cut in services for passengers on the London rail network will have a particularly negative impact on disabled, elderly and other vulnerable passengers. I am also seeking assurances that these proposals would not lead to a reduction in the number of staff employed, the hours available to them to work and that the proposals will not lead to other negative changes to employees' terms and conditions.

Ticket offices, and the staff who work from them, provide important advice and support for passengers. Whilst the ticket offices at the stations in Islington that are proposed to be closed sell relatively few tickets per day, the consultation document does not provide any measurement of the

advice and support that staff in these offices provide. I believe the consultation document provides an incomplete picture of the importance of ticket offices to passengers by not including any measure of their performance other than the number of tickets sold.

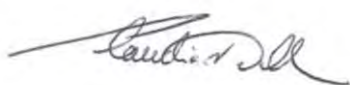
As I am sure you will agree, the reassuring presence of a staffed and open ticket office on a station is important for many passengers, particularly more vulnerable people, as the office is a fixed location where they know they can go for assistance. The consultation document suggests that staff will be more visible if the ticket offices are closed. However, given that a station may only have a single member of staff on duty, it is highly likely that not all passengers would be able to access support if they cannot locate the member of staff at the station, or if they are on an alternative platform, for example. A staffed ticket office removes this uncertainty and is reassuring to many passengers.

Similarly, whilst the installation of ticket vending machines at stations is welcome, this should be in addition to staff being available to help passengers. Without staff assistance, some passengers may be overcharged for tickets by selecting the incorrect options on the machines, or be deterred from traveling altogether if they cannot receive advice from a member of staff about tickets or routes. Having an open and staffed ticket office avoids both of these issues and, therefore, by closing these offices, passengers would be receiving a reduced service.

I would welcome staff being more visible on stations, but I would strongly argue that this should be delivered through an increase in staff numbers, rather than by closing ticket offices. I would strongly urge Arriva to consider adding additional staff to stations, as I understand there are currently over 100 vacancies across the London Overground for positions at stations. The number of vacancies is particularly concerning given the 42.5% increase in violent crime at 36 stations across the network. I am concerned that closing ticket offices would also make it harder for staff to monitor CCTV images, as they would be away from terminals whilst on the station. Passengers need to feel safe when using the transport network, and a visible staff presence and an open ticket office can provide such reassurance, whilst also helping to prevent and detect crime.

The London Overground plays an important part in the London travel network, helping Islington residents to travel to work, health appointments, school and to visit friends and family across the city. It is vital that we ensure that it remains truly accessible to all passengers, and it is for that reason that I would strongly argue against the proposed ticket office closures as outlined in this consultation.

Yours sincerely,



**Councillor Claudia Webbe**  
**Executive Member for Environment and Transport**

Cc – Sadiq Khan, Mayor of London  
Heidi Alexander, Deputy Mayor for Transport



Dear London TravelWatch

Consultation on Arriva Rail London (ARL) and Transport for London (TfL) plans to close ticket offices at 51 London Overground stations.

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- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Please take my concerns into consideration when considering this statutory consultation.

Sincerely  
CLLR BILL WILLIAMS

## **Statutory Consultation response to Arriva Rail London's proposal to close 51 ticket offices**

We are the Labour district councillors representing South Oxhey and are responding in respect of the Statutory Consultation into Arriva Rail London's proposal to close 51 ticket offices on the London Overground.

The nearest station to South Oxhey is Carpenders which has served the area since the estate came into being in the 1950s. Residents have thus been used to a ticket office at the station from then until now.

The proposal to close the ticket office does not, in our view, sit well with their stated commitment to "the highest levels of customer service". The perception from South Oxhey residents is that it is a retrograde step and in all likelihood probably a done deal, no matter what objections are raised.

We are unsure as to what the document refers to as "the emerging customer need" means in reality. This is unclear gobbledegook. Have passengers besieged the train operator with demands to shut the ticket office at Carpenders Park? We think not.

We note that only three months' figures for Ticket Vending Machine Availability have been supplied, presumably with the intention of providing reassurance that tickets can still be purchased using them. This seems to us to be placing an over-reliance upon statistics derived from what is, after all, a relatively short time span.

Data supplied does however conclusively show that on weekday morning peaks that Carpenders Park is one of the busier ticket offices of those threatened with closure. This is, in fact, highlighted and accepted by Arriva Rail.

The consultation document is extremely weak in detail when it states that a "member of staff will be on each managed station from 15 minutes before the first train in the morning until 15 minutes after the last train in the evening." The document states that Arriva Rail will be penalised financially if this condition is not met, but actually passengers will be the real losers. It is all somewhat skewed and focuses on the downside for the train operator never mind the so-called "customer".

Further, there is no comfort to be gained from this statement in terms of what that staff member in situ will actually be trained and available to do.

The document lists a number of vagaries; staff will be available to "support customers", provide "a station presence", engage in a "casual interaction", provide "necessary information" and "support a passenger who requires additional assistance to complete their journey". At no point is it even remotely suggested the staff member will be able to sell a ticket, or will be trained in use of the ticket machines which, in any event, may go on the blink. A simpering manner and smiling sweetly just doesn't cut the mustard.

Carpenders Park station has an island platform with a long ramp leading to it thus not affording expeditious access to the street. It clearly benefits from presently having a fully functioning and staffed ticket office together with a person patrolling the platform. Again the document is unclear

as to just how many staff there will be at the station at any given time. Will it be the same, greater, or fewer than now? Ominously the document fails to state what the level will be.

There is a significant elderly population served by the station which straddles both the community of Carpenders Park and the larger South Oxhey area and population. The ability to purchase a ticket from a human being and be served at a counter rather than being potentially at the mercy of a faceless ticket machine is a great comfort to many.

We submit that there are a considerable number of unexplained issues that arise from the publication of the consultation document which call into question the wisdom of closing the booking office and there is a failure to provide a compelling case for just such an outcome.

Given the unanswered questions and it would appear, an unseemly and hurried consultation period, when these proposals have been months in the making, we respectfully submit that the case for closure is not proven and that Arriva Rail London should either withdraw their proposals or see them hit the buffers.

We are implacably opposed to the booking office closure at Carpenders Park station and in doing so represent the voice of South Oxhey residents whom we are elected to serve.

Councillors Stephen Cox, Joan King and Stephen King

**From:** Bell, Cllr Paul [[mailto:Cllr\\_Paul.Bell@lewisham.gov.uk](mailto:Cllr_Paul.Bell@lewisham.gov.uk)]  
**Sent:** 27 September 2018 17:14  
**To:** Sorba, Cllr Luke; Mouncey Simon (ST)  
**Cc:** Damien Egan, Mayor of Lewisham; McGeevor, Cllr Sophie; Dacres, Cllr Brenda; Moss, Simon; Crush, Alexandra  
**Subject:** RE: Consultation on closure of London Overground ticket offices

I totally agree with Cllr Sorba.

Best wishes,

**Cllr Paul Bell**  
**One of the three Labour councillors for Telegraph Hill Ward**  
**Cabinet Member for Housing**

Telephone: 020 8314 7047  
Twitter: @paulbell1971 | Web: <http://www.paulbell.org>

**From:** Sorba, Cllr Luke  
**Sent:** 20 September 2018 16:29  
**To:** Mouncey Simon (ST)  
**Cc:** Damien Egan, Mayor of Lewisham; McGeevor, Cllr Sophie; Dacres, Cllr Brenda; Moss, Simon; Crush, Alexandra; Bell, Cllr Paul  
**Subject:** Re: Consultation on closure of London Overground ticket offices

Dear Simon

Thank you for the detailed notice of the plans and upcoming consultation.

May I record straight away my complete opposition to the closure or reduction in hours of any staffed ticket office in Lewisham.

In my view, having real human beings is an integral part of the public service mandate of London Overground. As well as selling tickets, the staff offer advice on travel and help with the regular automated payment problems. They also provide visible reassurance and practical safety including on the spot First Aid opportunities in a place where the stress and misery of commuting is growing.

I am entirely against the direction we are going in terms of greater automation in those public sector duties that should be customer facing. I do not want my constituents inhabiting a ghostly world of machines run by unaccountable AI generated programmes and becoming increasingly alienated from the organisations they pay go to serve them, such as Arriva and TFL. There is more to society than ever greater financial "efficiency". Relentless dehumanization of where sympathetic and professional actual people used to be available will have very ill effects on mental wellbeing and social cohesion.

Best wishes

Luke Sorba

Councillor for Telegraph Hill Ward

Sent from my iPhone

On 20 Sep 2018, at 12:08, Mouncey Simon (ST) <[Simon.Mouncey@tfl.gov.uk](mailto:Simon.Mouncey@tfl.gov.uk)> wrote:

Dear all, London TravelWatch (LTW) has started an independent public consultation on closing London Overground ticket offices. London Overground is operated on our behalf by Arriva Rail London (ARL) and it is carrying out a statutory consultation at the same time

### Background

ARL's Customer Journey Modernisation programme is a key part of its contract with us. It was announced in September 2017 and will deliver radical changes to the way London Overground stations operate, allowing staff to provide better customer service by being more visible, accessible, and responsive. The changes, if it is decided to go ahead with them, would improve how information is provided to customers, modernising the process of buying tickets and reflecting changes to how people prefer to pay for their travel. The programme would also allow a change in the London Overground permanent staff recruitment model, moving away from the previous reliance on agency staff and, at the same time, simplifying job grades and providing more job variety and training. All stations would, as now, remain staffed at all times while trains are running. The changes would result in an annual saving of up to £5m, which is assumed in our 2017 Business Plan

ARL is carrying out a statutory consultation with its stakeholders such as the DfT and staff. The details of staffing changes would not be confirmed until the proposals have been decided on and until negotiations with trade unions have been completed. ARL's engagement and consultation plans incorporate lessons learned from London Underground's Fit for the Future Stations programme, including early engagement with staff and unions and consulting with LTW which has already happened (and been reported on in the media). ARL has visited all the stations as part of a programme of joint reviews with trade union representatives, speaking to station staff to get their input and identifying any specific local safety and security issues that would need to be taken into account before any changes are implemented

LTW is carrying out the public consultation on ARL's behalf as it carried out a review, commissioned by the Mayor, of changes to staffing at London Underground stations and has a lot of experience in this area. LTW will conduct a three week public consultation to inform its response back to ARL

No final decisions will be made until the consultations have been completed and the results have been analysed and considered. The resulting plans will be thoroughly communicated before any changes are made

### How does it affect Lewisham (the East London Line)

The statutory consultation sets out proposals to close the ticket offices at 51 stations that fall below the DfT's 'busy' threshold of 12 ticket sales per hour throughout the day. A poster will be displayed in each station where a ticket office has been proposed for closure, this includes:

Honor Oak Park

ARL is still considering options for the 14 London Overground stations where ticket sales exceed the DfT's 'busy' threshold for part of the day. Options for these may include reducing the opening hours. Any reduction in opening hours would be subject to a separate statutory consultation at a later date, these include:

New Cross Gate  
Forest Hill  
Sydenham  
Brockley

### Accessibility

By having staff visible and available in those parts of the station that customers really need them they will be better placed to help all customers, whatever their needs. TfL and ARL will ensure that the needs of vulnerable customers are fully taken into account as part of the review and the final proposal will include details of how these needs would be met. Accessibility and the need to continue to provide a 'Turn up and Go' service for customers who need extra assistance is an important factor that will be considered as part of this process. The review of the staffing model is underway and there are no firm proposals to share as yet. Details of staffing numbers will depend on a number of factors, including the outcome of statutory consultation, demand for customer assistance, the presence of ticket gatelines, the need for platform supervision and safety considerations

### Ticket machines

All self-service ticket vending machines across the London Overground network are in the process of being upgraded or replaced to significantly increase the range of ticket options available. Functionality will include the sale of tickets to all National Rail destinations, advance tickets, Oyster and paper weekly and Oyster monthly travelcards, Oyster top-up and printing out tickets ordered online. Each station will have multiple machines so others can be used if needed. Staff will be trained to help customers use the machines. If a product or service is not available on the machine, staff will be trained to inform customers of alternative ways of obtaining that product or service

### Learning from Fit For the Future/London Underground

ARL has reviewed the learnings TfL and London TravelWatch have shared on London Underground's Fit for the Future Stations programme, and is carefully considering these as it designs the Customer Journey Modernisation programme. Pre-engagement with staff and unions has been taking place since the end of last year/beginning of this year. The consultation run by London TravelWatch will give customers and stakeholders the opportunity to feed back their views before any decisions are made. ARL and London Underground teams are working closely together on delivering this type of change

The London Overground stations in Lewisham has been the focus of discussions with councillors and Vicky Foxcroft MP who has also been made aware of the proposals. It would be very useful if I can invite someone involved in developing these proposals to brief you at a further meeting so your response to the consultation is as well informed as it can be

Please contact me any time. Best wishes, Simon

### **Simon Mouncey**

Community Partnerships Specialist


Transport for London

Floor 8 R1, 5 Endeavour Square Stratford London E20 1JN

t 020 3054 0947/ int 80947

e [simon.mouncey@tfl.gov.uk](mailto:simon.mouncey@tfl.gov.uk)

w [tfl.gov.uk](http://tfl.gov.uk)

 Help to save paper - do you need to print this email?

TfL's values are leadership, operational excellence, service and humanity

**TfL's purpose is to keep London working, growing and to make life in London better**

<image002.png> If you are a carer or know someone who is our staff network can help, email 'Carers SNG'

# Florence Eshalomi AM

London Assembly Member for Lambeth & Southwark

City Hall  
The Queen's Walk  
London SE1A 2AA  
Switchboard: 020 7983 4000  
Minicom: 020 7983 4458  
Web: [www.london.gov.uk](http://www.london.gov.uk)

London Travelwatch  
169 Union Street,  
London SE1 0LL

**Our ref:** FE/SM

**Your ref:**

**Date:** 11<sup>th</sup> October 2018

Dear Travelwatch,

## **Planned closure of ticket offices at 51 London Overground stations – Labour Group Response**

This consultation leaves several unanswered questions and as a result Labour group are unable to support the proposals.

### **Staffing levels**

The Concession Agreement between TfL and Arriva Rail London deals with staffing issues as follows:

3. STAFFING OF LONDON OVERGROUND STATIONS Standard 3.1 The Operator shall at all times during the Concession Period provide appropriate staffing at London Overground Stations so as to ensure that: (a) it can efficiently comply with any of its safety, customer service and operating obligations under this Agreement, any Licences and any applicable Law; (b) it can provide high levels of passenger reassurance; and (c) it meets passenger requirements and customer expectations.

However, the agreement does not specify how many staff are needed, over and above ensuring that there is one member of staff available on every single station always.

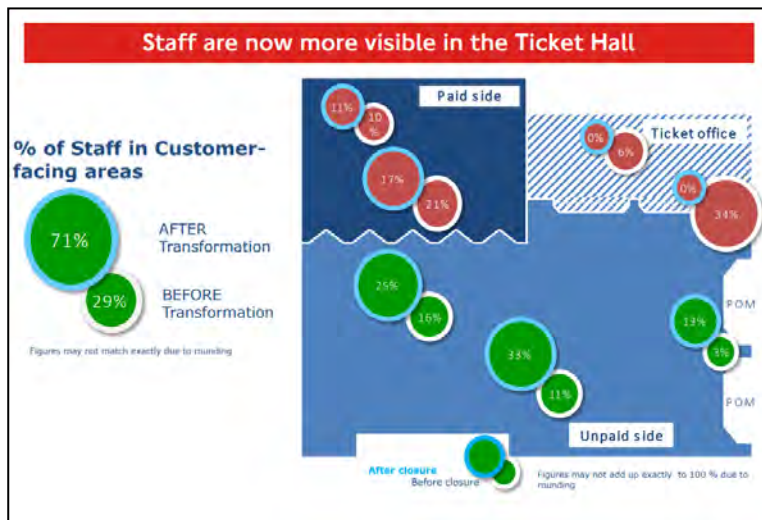
The consultation document says

The availability of staff to carry out customer service duties would be enhanced by the removal of an obligation to be within a Booking Office. It would be more cost effective to employ staff in the pursuit of the above, rather than to staff a ticket office

Unfortunately, the consultation does not explain how many staff work on stations now, with a breakdown between those inside and outside of the ticket offices and what the proposed staffing model will be in the future. We are surprised that this is not the case, given the Fit for the Future programme on London Underground.

**Direct telephone:** 020 7983 4427 Fax: 020 7983 4418 Email: [Florence.Eshalomi@london.gov.uk](mailto:Florence.Eshalomi@london.gov.uk)

There TfL provided details on how many roles would go and the split of current/future staffing levels on the paid/unpaid sides of the station.



In their Customer Journey Modernisation Station Review the RMT/TSSA state, “Arriva Rail London were, and still to this day reluctant to discuss proposed staffing levels”.

It is very concerning that this consultation does not give any figures on the staffing levels or roles that are in place now and will be in place after the proposed changes. Without know what the “appropriate staffing” levels are before and after these proposed changes we will not know what sort of effect they will have on passenger reassurance and customer expectations.

We have asked TfL for this information and have been given the following information

### Current staffing levels

There are currently around 350 permanent Arriva Rail London (ARL) employees who work in various grades and roles to provide customer service on London Overground  
There are around 200 full time equivalent positions currently covered by agency staff

### Future staffing levels

As part of the Customer Journey Modernisation programme, ARL will seek, and consult on, a simplified staffing model that would increase the number of staff it directly employs in permanent roles and reduce the reliance on agency staff. ARL will seek to redeploy all staff to new roles and make reasonable adjustments to enable this wherever possible

Proposed staffing levels will take account of a number of factors, including the outcome of statutory consultation, demand for customer assistance, the presence of ticket gatelines, the need for platform supervision and safety considerations

Where ARL is given permission to close Ticket Offices, it will look to redeploy affected staff into new positions which will be multifunctional and flexible, and staff will receive a comprehensive package of training and development

Agency staff will have the opportunity to apply for any vacancies created as a part of the programme



We are not sure why this information could not have been included in the consultation document. We have noted that there does not appear to be a plan for future staffing levels.

This is a mistake. London Underground cut 777 workers in 2016 when they closed their ticket offices and then had to employ an extra 650 staff in 2017 when they realised the cuts were affecting customer service.<sup>1</sup> Without a solid plan on future staffing the same thing could happen with London Overground.

## **Ticket Machines**

The consultation says

Current levels of accessibility to facilities for the sale of fares will be maintained through the Ticket Vending Machine provision at the station, which matches the demand profile of the station, and TfL's existing suite of online and app-based functionality.

This suggests that not every ticket will be available at the Ticket Vending Machines. The consultation continues

Currently, 99% of products sold at these stations can be migrated to the fleet of Ticket Vending Machines

The consultation includes a graph entitled "Percentage of ARL ticket office sales, by product available at TVMs" which suggests Monthly Season Ticket and Railcards cannot be purchased via the Ticket Vending Machine.

The consultation should be clearer in explaining a) what ticketing products cannot be sold by the Ticket Vending Machines and b) ranking those products in terms of the demand profile of the network so we can see how many transactions would be affected.

We asked TfL to clarify this point and they provided the following information.

### **Demand for different ticket types and their availability on ticket vending machines**

Please see the attached list showing the demand for different ticket types at all London Overground ticket offices. Please note that this includes those ticket offices which are not part of this consultation. ARL is working on solutions to close the gap even further through further upgrades to the ticket machines.

---

<sup>1</sup> <https://www.bbc.co.uk/news/uk-england-london-39491219>

Product	Percentage of TO transactions	Will TVMs fulfil in future?	%age of TO transactions unable to be conducted on TVMs
Oyster Top up	59.815%	Y	
Return	14.654%	Y	
Weekly Season	11.737%	Y	
Single	8.136%	Y	
Monthly Season	3.131%	Y*	
Advance	1.071%	Y	
Travelcard	0.519%	Y	
Railcard (NB - railcard discounts are available on TVMs)	0.433%	N	
London Bus Pass	0.264%	Y	
Annual Season	0.118%	N	
Platform Ticket	0.050%	N	
Supplement	0.022%	N	
Excess	0.020%	N	
Group	0.013%	Y	
Odd Period Season	0.008%	N	
Promotion	0.004%	N	
Accounting	0.003%	N	
Penalty Fares	0.002%	N	
Rover	0.001%	Y	
<b>Grand Total</b>	<b>100.00%</b>		<b>0.66%</b>
			(excludes priv rate and new monthly seasons)
Y* renewals only			

While 0.66% of tickets will no longer be able to be purchased, the consultation does not explain how those people will be able to buy those tickets in the future. The consultation also does not address several points raised by the RMT. Passengers;

- May not be able to access all the tickets and services needed from a ticket machine
- Find it harder to obtain advice on tickets and fares
- Would be frustrated that there were insufficient numbers of ticket machines
- Would experience more delays and concourse congestion
- Who are disabled, elderly and vulnerable may be less confident using a ticket machine and may end up overspending or being deterred from travelling

The response to the consultation should added all these points to ensure that the most vulnerable customers do not suffer a worsening in the service levels they experience.

## Lesson Learned

In October 2017 the Mayor said, “As you know, last year I asked London TravelWatch to carry out an independent review of changes to staffing at Underground stations, including closing ticket offices. TfL is working through the recommendations of the review to ensure the most appropriate service is provided to customers. We are incorporating the lessons learnt from the Underground into the Overground's Customer Journey Modernisation programme.”

The consultation does not mention the review and so it is unclear to us what lessons they are incorporating into their plans. The main recommendations were

- If the recommendations are implemented, London Underground can effectively meet passenger needs without the need for a comprehensive network of ticket offices
- Passengers can benefit from the changes to how London Underground operates its stations, but only if the recommendations listed in this report are implemented
- The full programme of ticket office closures was carried out before all accompanying elements were in place, particularly the updating of ticket machines to provide the necessary functionality and to be reliable enough to cope with the extra demand
- If it is not possible to address the key issues outlined in this report, then it may be necessary to re-open some ticket offices.

Furthermore, the number of ticketing products that can be sold for a London Underground journey versus the number that can be sold for a rail journey are very different. The consultation does not address this issue, it merely highlights the fact there will be “appropriate staffing”.

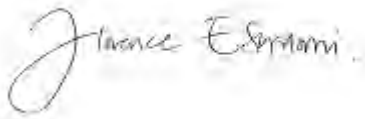
TfL have told us that

ARL have regular meetings with LU  
The 14 London TravelWatch recommendations will be carefully considered alongside consultation feedback and union discussions as ARL develops its plans  
We'll be able to respond to each of the recommendations around the time that plans are confirmed, following consultation and union engagement

It appears to us that TfL are not handling this process in the most efficient way. Surely it would have been better to develop their proposals, based on the lesson learned from London Underground, and then gone out to consultation, rather than only look at the London Underground experience after the consultation.

Due to the lack of transparency about these proposals Labour Group are currently unable to support them. We hope that TfL will address our concerns before the next stage of the process, so all passengers can be sure of what exactly is being proposed and how it will actually affect them.

Yours sincerely,

A handwritten signature in black ink, reading "Florence Eshalomi". The signature is written in a cursive style with a large, stylized initial 'F'.

**Florence Eshalomi AM**  
**London Assembly, Lambeth & Southwark**

LONDON  
09 OCT 2018  
TRAVELWATCH

## **Hackney Pensioners' Convention**

Chair – Paul Higgins, Secretary Nigel Gansell  
Treasurer – Jonathan Malins-Smith

For the attention of  
Campaigns Director,  
LONDON TRAVELWATCH,  
169 Union Street, SE1 OLL

October 6<sup>th</sup>, 2018.

Dear Campaigns Director,

### **RE PROPOSED CLOSURE OF 51 BOOKING OFFICES ON LONDON OVERGROUND BY ARRIVA LONDON /**

*The Convention, at its general meeting held earlier this month decided to back the campaign organised by RMT union to safeguard the guards on the Southern Trains network with a motion and support to Mick Cash, Gen Sec of RMT.*

*Unfortunately I was unaware of the planned closure of ticket offices on LONDON OVERGROUND until I read it the following day of our meeting in the ISLINGTON TRIBUNE newspaper.*

*I perused your website and spotted the Consultation procedures run by TRAVEL WATCH to oppose the proposals by ARRIVA LONDON.*

*I am unclear whether this letter will be enough to voice HPC concerns and to back your Campaign to keep the ticket offices fully open to the elderly, disabled etc.*

*Our Chair Mr Paul Higgins and myself have been railways fans and supporters over many many years. We are planning a general meeting in the New Year on local travel problems in LB of Hackney and pan-London etc. If you would like to support us and even attend our next meeting [Leaflet is enclosed.] please let me know. Regards,*

Yours sincerely

Nigel Gansell Sec 0743 241 6084.



*ps. Do you have any stickers,  
Badges, you could supply  
us with?*



**Rt. Hon Joan Ryan MP**

House of Commons

London, SW1A 0AA

Tel: 0207 219 2442

Email: joan.ryan.mp@parliament.uk

11 October 2018

Mr Arthur Leathley  
Chair, London TravelWatch  
169 Union Street  
London  
SE1 0LL

Dear Mr Leathley,

I note Arriva Rail London's plans to close ticket offices at 51 London Overground stations.

I am writing to formally submit my views to London TravelWatch's consultation on this matter, specifically relating to the proposed closure of Turkey Street station's ticket office in my constituency.

I am concerned that the possible closure of this ticket office may result in fewer on-site staff and public confusion about their duties, as well as less visible sources of assistance for passengers.

Firstly, although I understand that Transport for London (TfL) have stated that "*all stations will continue to be staffed from 15 minutes before the first train of the day until 15 minutes after the last*", will the closure of these ticket offices result in *fewer* staff being on-site during the course of the day? If not, can you guarantee that TfL have no intentions to reduce the number of staff at Turkey Street station?

As many passengers require advice on tickets, train times and delays on a daily basis, who will they be able to receive assistance from? What will the duties of staff be if they are not in the ticket office, and can you confirm that on-site staff will be able to assist with these enquires?

Finally, what provisions are being put in place to maintain and improve safety and accessibility at Turkey Street station?

Thank you for your consideration on these important issues, I look forward to hearing from you.

Yours sincerely,

**Rt. Hon Joan Ryan MP**  
**Member of Parliament for Enfield North**

c.c. Heidi Alexander, Deputy Mayor, Transport and Deputy Chair, Transport for London



**KATE OSAMOR MP**

HOUSE OF COMMONS

LONDON SW1A 0AA

Mr Tim Bellenger  
Director, Policy & Investigation  
London TravelWatch  
169 Union Street  
LONDON SE1 0LL

**9 October 2018**  
**MP Case Ref: ED/ZA34754**

Dear Mr Bellenger

**RE: Mr John Stanford**

I have been approached by my constituent, above, regarding concerns about plans to close 51 ticket offices at stations across the London Overground network.

I understand the ticket offices affected are:

*Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.*

You will be aware that this list includes stations in my own constituency and in Enfield.

As indicated by my constituent, these are potentially damaging and detrimental cuts.

Clearly there is a need for staffed ticket offices at stations. I am aware, from my own experience and that of many of my constituents, of the need for – and importance of – staff at stations, not least in helping to provide a safe and secure environment. Moreover, passengers need information, help and assistance in procuring tickets and travel routes.

Replacing staffed ticket offices with ticket machines, or mobile staff expected to sell tickets on platforms, will limit the quality and range of services available to passengers.

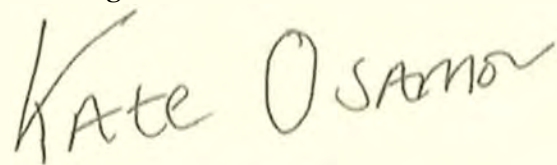
Other concerns raised include:

- (1) concourse congestion
- (2) delays
- (3) no advice/information point in assisting passengers with their journeys
- (4) demand exceeding supply, with long queues for machines, exacerbating delays
- (5) faulty machines, affecting ability to travel
- (6) additional difficulties for the elderly, disabled and vulnerable who may need added assistance
- (7) safety and security issues and increased ASB where stations are unstaffed and/or understaffed.

My constituent has asked me to draw his concerns to your urgent attention when considering this statutory consultation. I undertook to do so.

I would be grateful, also, for a reply, addressing all the issues raised – issues which I strongly ask are considered.

Kind regards

A handwritten signature in dark ink, reading "Kate Osamor". The signature is written in a cursive, flowing style. The first name "Kate" is written in a larger, more prominent script, and the surname "Osamor" follows in a similar but slightly more compact script. The ink appears to be a dark blue or black.

**KATE OSAMOR MP**

**Member of Parliament for Edmonton**





London Travel Watch  
By email to:  
[consultations@londontravelwatch.org.uk](mailto:consultations@londontravelwatch.org.uk)

Alex Crush  
Transport Policy & Development  
Manager  
London Borough of Lewisham  
Laurence House  
Catford  
London SE6 4RU

[alexandra.crush@lewisham.gov.uk](mailto:alexandra.crush@lewisham.gov.uk)

18 October 2018

## **Response to the consultation on planned closure of ticket offices at 51 London Overground stations**

Dear Sir/Madam

This letter sets out the London Borough of Lewisham's response to the consultation on the proposed ticket office closures at a number of London Overground stations. It should be noted that this letter replaces our previous response of 11 October, in order to take on board the views of our Members that were raised at a Council meeting, the details of which were only recently made available to officers.

The only station within the London Borough of Lewisham to currently be affected by this proposal is Honor Oak Park station. However, the proposed closures at Anerley, Penge West, Rotherhithe and Surrey Quays are also likely to impact many Lewisham residents. Some residents will also use stations across the whole of the Overground network for daily journeys, including the 51 stations where this service cut is proposed.

Although it is recognised that there are some potential benefits in the approach put forward, the Council believes that these cuts will be particularly damaging to certain groups within the community, meaning that on balance there is still a need for staffed ticket offices at stations.

The Council supports the three core principles of customer service that form part of Arriva's Customer Journey Modernisation Programme, of which this proposal forms a part of:

- Our staff are welcoming (visible)
- Our staff are full of info (truthful)
- Our staff always go the extra mile (useful)

It is also recognised that an increasing number of passengers are changing the way in which they purchase tickets, with less reliance on ticket offices and machines at stations than there used to be. This means that there could be some benefits to passengers in giving station staff more flexibility to move around the station so that they can be where they are most needed by passengers at the time. It is understood that 99% of ticket types can be bought from the ticket machines, and that members of staff would still be on hand to support customers using these machines, as well as being able to provide other assistance to passengers, as required. However, given the choice between purchasing tickets at a ticket office and from a machine, it is understood that industry research shows the majority still prefer ticket offices.

Strong concerns have therefore been raised by a number of local Ward Members, which was put forward as a motion to Council and agreed. In summary the concerns are that residents of Lewisham:

- would not be able to access all the tickets and services needed from a ticket machine;
- would find it harder to obtain advice on tickets and fares without a staffed office;
- would be concerned that there were insufficient numbers of ticket machines (due to them being in high demand or faulty);
- would experience more delays and concourse congestion;
- those who are disabled, elderly and vulnerable may be less confident using a ticket machine and could end up overspending or being deterred from travelling; and
- that by leaving stations understaffed and sometimes unstaffed it will make it harder to provide a safe and secure environment — especially with CCTV left unmonitored.

Further information is therefore required on the number of ticket machines proposed to be provided at Honor Oak Park station and other stations to ensure there is a degree of resilience in place, for instance if one or more of the machines were to break down. Assurances are also required that the ticket machines will be well maintained, and that any issues with the machines beyond the capabilities of the station staff will be resolved in a timely manner.

It will also be important to understand through the consultation which ticket types cannot be purchased via the machines, and to ensure that passengers are aware of the other channels available to them.

Lastly, it would be important to comprehend if there are any other issues that are normally dealt with by ticket office staff that could not be as easily addressed through the new arrangements.

I'd be grateful for a response on the above matters from TfL, who are copied into this consultation response. However, even if the above questions can be addressed, the strongest reservation is the impact it has on the most vulnerable user groups, as we would not wish to see them discouraged from rail travel. The Council therefore calls upon the GLA and TfL to reconsider these proposals and continue to provide the best possible and safest Overground service to the people of Lewisham and London.

Yours faithfully

**Alex Crush**

Transport Policy & Development Manager

Cc:

Simon Moss, London Borough of Lewisham

Simon Mouncey, Transport for London



Town Hall, Watford, WD17 3EX

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London Travelwatch  
169 Union Street  
London  
SE1 0LL

Enquiries to Nick Sutton  
Phone no 01923 278580  
Our reference NS/ 008  
Your reference

Date  
22/10/2018

LONDON  
24 OCT 2018  
TRAVELWATCH

Dear London Travelwatch,

**RE: London Overground Station Closure Motion to Full Council**

At a meeting of Watford Borough's Full Council on 16<sup>th</sup> October, a motion was unanimously passed condemning potential plans to close ticket offices at Watford High Street and Carpenders Park stations. I've enclosed the motion in full for your reference in this letter.

As part of this motion, I have been asked to write to you expressing the council's concern at these plans.

Manned ticket offices provide a very important amenity to local residents travelling on your rail services. They help vulnerable older or disabled residents with ticketing enquiries and help maintain passenger safety at stations.

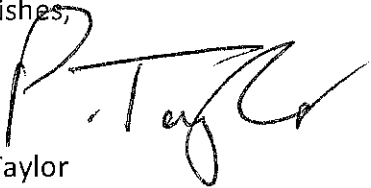
In particular, I am concerned about the impact that removing ticket offices would have on Watford residents living with Dementia. One of my key priorities as Mayor is to make Watford a more Dementia Friendly Town. Research carried out by the Alzheimer's Society shows that one of the biggest challenges for someone living with Dementia is using public transport. Someone living with Dementia would find buying a ticket or using an Oyster difficult and may often need assistance from trained staff. If staffing were to be removed, many residents living with Dementia would not be able to use Overground services in the town.

As a council, we are also concerned at the three week consultation time. Residents and interested stakeholders should have had longer in order to examine the plans and give responses to your survey. I hope you would consider running further consultations before a final decision is made. As a council, we would also be keen to have a copy of any Equality Impact Assessments that have been undertaken by Arriva or TfL as part of this decision.

Over 1000 residents have signed a petition condemning the decision, as well as all Watford Borough councillors voting for this motion. On behalf of Watford Borough Council, I would like to make clear our opposition to this decision.

I look forward to hearing from you.

Best wishes,

A handwritten signature in black ink, appearing to read 'P. Taylor', with a stylized flourish at the end.

Peter Taylor  
Elected Mayor of Watford

RECEIVED

10/11/11

11/11/11

London TravelWatch  
169 Union Street  
London  
SE1 0LL

**please reply to:**  
70 Dynevor Road  
Stoke Newington  
London  
N16 0DX

[consultations@londontravelwatch.org.uk](mailto:consultations@londontravelwatch.org.uk)

[roger.blake@railfuture.org.uk](mailto:roger.blake@railfuture.org.uk)

Date 12-10-2018

Dear London TravelWatch,

### **Planned closure of ticket offices at 51 London Overground stations**

Railfuture is the leading national independent voluntary organisation campaigning for a better railway across a bigger network for passenger and freight users in order to support economic growth, environmental improvement and better-connected communities.

We appreciate the opportunity to contribute through this consultation to a decision on the future of some of London Overground's ticket offices. We note that the online survey will usefully capture individuals' responses on their personal experience at a particular station.

Railfuture notes that for Transport for London 'every journey matters'; for Railfuture, every passenger matters. We advocate a railway where an industry-wide commitment to excellent customer service is front and centre of every part of the railway's culture. For London Overground in particular Railfuture has always welcomed the commitment to station staffing throughout all operational hours, a commitment which this consultation assures remains and without qualification.

Railfuture has also noted the similar transition to alternative models of retailing tickets and other 'permits to travel' such as Oyster, and associated customer service, on London Underground, together with London TravelWatch's review published in December 2016 to ensure that early deficiencies were addressed. London in general and TfL in particular therefore have experience of a previous similar transition. TfL and London Overground, albeit mostly through the previous concessionaire, also have extensive change-management experience in successfully modernising the working practices of other front-line, customer-facing staff through for example the evolution to a one-person-operated train fleet serving all of London Overground's routes.

In consideration of the above together with the evidence supplied by the operator ARL in '*Information in support of a Statutory Consultation regarding a Major Change Proposal*' Railfuture is therefore able to offer general support for the proposals. We note that several London Overground stations – nine of the twelve along the Barking-Gospel Oak line and three at the southern end of the West Anglia line – do not have ticket offices yet growth in the usage of those stations appears to continue unabated.

We do however question the advisability of simultaneously closing all ticket offices in the same locality, and advocate the retention of at least one for a period of some months during which an assessment can be made of any changes to its usage and long-term viability as a service to passengers.

[www.railfuture.org.uk](http://www.railfuture.org.uk) [www.railfuturescotland.org.uk](http://www.railfuturescotland.org.uk) [www.railfuturewales.org.uk](http://www.railfuturewales.org.uk)  
[www.railwatch.org.uk](http://www.railwatch.org.uk)

As an example, two London Overground stations, each in the top 100-busiest in Britain and in the same town centre, are both proposed for closure. Dalston Kingsland with 2016/17 ORR estimated usage of 6.2 million (82<sup>nd</sup>-busiest) and Dalston Junction with estimated usage of 5.3 million (92<sup>nd</sup>-busiest) in our view warrant a 'stay of execution' for Dalston Kingsland, pending a further review if Dalston Junction is closed. Similarly, Hackney Central with estimated usage of 4.8 million (102<sup>nd</sup>-busiest) and Hackney Downs with 3.9 million (132<sup>nd</sup>-busiest) would in our view justify a 'stay of execution' for Hackney Central (directly-connected with Hackney Downs since July 2015). From the submitted Appendices it appears that ticket office availability at Dalston Kingsland already needs remedial action, as do the TVMs at both central Hackney stations.

There is also the wider concern, especially for those stations left reliant on TVMs, with the accompanying need for well-trained station staff fully conversant with what the TVMs can and cannot retail, that the fullest possible range of national rail products, and discounts, is readily available.

Subject to those provisos, Railfuture would be content in principle for the proposals to proceed. It will probably be helpful if, as with the London Underground example, London TravelWatch carry out an implementation review after, say, six to twelve months. That review could include an assessment of whether or not any ticket offices given a 'stay of execution' have, as a result of the closure of their nearby neighbour, subsequently become officially 'busy' through increased ticket sales going above the 12 per hour threshold, and therefore justify retention.

Yours faithfully,

Roger Blake  
Railfuture  
Director, national Board  
Vice-Chair, London and South East regional branch





Janet Cooke  
Chief executive  
London TravelWatch  
169 Union Street  
London  
SE1 0LL

LONDON  
11 OCT 2018  
TRAVELWATCH

11<sup>th</sup> October 2018

NP R2/1BO

Dear *Janet*

### **Arriva Rail London Overground Station ticket offices closures**

I am writing in response to your recent consultation on the proposals from Arriva Rail London (ARL) to both close 51 ticket offices across the London Overground network. This is as a result of Transport for London's activation of the ticket office 'priced option' in ARL's contract.

I am seriously concerned that the display of posters by ARL encouraging responses to this consultation have been limited and in many cases less than prominent. With a large amount of detailed text they are not immediately designed to engage. Most passengers said they were unaware of the proposals when RMT sought to raise awareness with passengers about what was going on.

### **The voice of the workers on the Overground Stations**

Since announcing their intention in the quaintly named 'Customer Journey Modernisation Programme' (CJM) ARL have conducted a station by station review alongside the trade unions and the resulting joint RMT/TSSA report is attached to this letter. I would be grateful if you could read this carefully as it has been written by the ticket office and station staff who work on London Overground. I would specifically draw your attention to its clear conclusions and recommendation, which is not to go ahead with these proposals.

The section on the increase in crime (page 13) is especially important to note along with the points of refuge /safety section on page 15. However it is important to also read the latest British Transport Police report which came out on the 5<sup>th</sup> October and





# National Union of Rail Maritime and Transport Workers



showed nationally over the last ten years violence against the person has increased by 47% and sexual offences by 167%.<sup>1</sup>

The services provided by Ticket Vending Machines (TVM) are analysed on page 25 of their report and it is abundantly clear that there are serious issues to be addressed with the range of services, with ticketless travel and fare evaders that must be properly addressed by ARL before any decision is made.

## The million exit and entries benchmark

RMT welcomed your report into Small Stations last year which significantly said:

"The 1 million passenger entries and exits figure is a rough borderline between those stations that justify the provision of automatic ticket barriers, staffed ticket offices throughout the operational day and other traits normally associated with larger stations"<sup>2</sup>.

With a staggering 128 million exits and entries in 2016/17 across all of these 51 stations, including 40 stations with well over a million exits and entries, it must follow that all these stations need staffed ticket offices and to agree their closure would fly in the face of your own benchmark.

## Ticket Vending Machines

RMT also wishes to highlight that Office for Road and Rail research into passenger's experience of ticket vending machines saw a deterioration of overall satisfaction over the year from March 2017 to March 2018 from 77% to 75%.<sup>3</sup> This is the same period in which the Action Plan launched by Rail minister Paul Maynard was implemented and designed to improve the passenger experience of fares and ticketing<sup>4</sup>. RMT believes strongly that this shows there is still much work to be done.

ARL in their consultation document claim otherwise and quote the Secretary of States guidelines back at passengers by saying that closure of the offices would "represent an improvement on current arrangements in terms of the quality of service".

<sup>1</sup> [http://media.btp.police.uk/r/15934/british\\_transport\\_police\\_releases\\_its\\_annual\\_repo](http://media.btp.police.uk/r/15934/british_transport_police_releases_its_annual_repo)

<sup>2</sup> [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=4401&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=4401&field=file)

<sup>3</sup> Office of Rail and Road Research into Passengers' Experience of Ticket Vending Machines Report of Findings March 2018 page 6

<sup>4</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/669746/action-plan-information-on-rail-fares-ticketing.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/669746/action-plan-information-on-rail-fares-ticketing.pdf)





We would point out that the actual guidelines require “the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and members of the public would continue to enjoy widespread and easy access to the Purchase of Rail Products, notwithstanding the change”.

RMT do not believe, and will outline below why this would not be the case under these proposals. ORR would also appear to agree with us and on the 13<sup>th</sup> September 2018 announced that it will press industry to improve competition, value and innovation in automatic ticket gates (ATGs) and ticket vending machines (TVMs). Noting that both pieces of equipment are key parts of the passenger experience – their functionality and capability impacts on the safe flow of passengers through stations and the roll out of new smart ticketing solutions they announced from the emerging findings in their market study into ATGs and TVMs that:

“the market for ATGs is a near-monopoly with weak competition, with buyers of gates potentially paying too much. For TVMs, we expressed concerns about service quality and the availability of machines.”<sup>5</sup>

ORR wants to make the market for ATGs and TVMs more competitive in order to promote innovation and the development of new products. ORR proposes to work with industry to take forward significant change in how competition works in these markets, including how equipment is purchased, to generate more incentives for suppliers to invest and compete, and to ensure that alternative suppliers with new ideas are not deterred from entering the rail retail industry.<sup>6</sup> RMT believes there is still much more to do and the market is neither ready nor capable of replacing ticket offices or the full range of services they currently provide.

### **The problems with the Ticket Vending Machines**

We do not believe ARL’s claim that upgraded ticket machines and staff on platforms can perform safely the full range of the tasks currently carried out at ticket offices.

Whilst technology is improving, the words of ORR from 2 years ago are still valid. The ORR said: “While millions of tickets are purchased using ticket vending machines without obvious problems being encountered, it is equally clear that further improvements in the information provided by such machines – such as clearer

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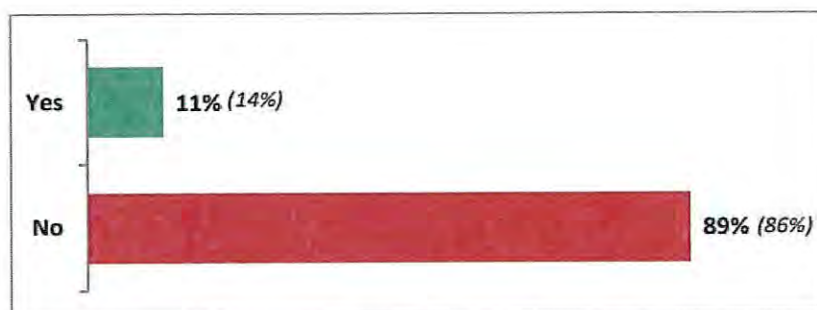
<sup>5</sup> <http://orr.gov.uk/rail/publications/research-and-studies/monitoring-markets/supply-of-automatic-ticket-gates-and-ticket-vending-machines-market-study>

<sup>6</sup> <http://orr.gov.uk/rail/publications/research-and-studies/monitoring-markets/supply-of-automatic-ticket-gates-and-ticket-vending-machines-market-study>

information on ticket restrictions and less use of industry terminology or jargon – would assist passengers in making the best decision when buying tickets.”<sup>7</sup>

In the most recent survey conducted by ORR mystery shoppers were asked how easy it was to obtain the information on the TVM about on- and off-peak times. Less than half the sample (40%) found it to be easy to find information on peak and off-peak times, although a quarter of the shoppers (25%) didn't feel strongly either way, and a total of 35% found obtaining this information on the TVM to be either 'Fairly Difficult' (15%) or 'Very Difficult' (20%).

In the same survey mystery shoppers were also asked if information was provided on the TVM indicating that other fare options, including cheaper fares, might be available from the ticket office<sup>8</sup>.



**Figure 5 – Was information provided on the TVM, indicating that other fare options, including cheaper fares, might be available from the ticket office?**

*(Base: Total Sample: 739)*

The majority of shoppers (89%) did not see information on the TVMs around other fare options possibly being available from the ticket office, an increase of 3% points on last year's survey.

Specifically, the following are areas of concern have been given to us by staff and passengers which should be read in conjunction with pages 23-26 in the attached RMT & TSSA report. This is a non-exhaustive list of the tasks that are currently performed at ticket offices, but which cannot always be carried out at ticket machines or on mobile hand held devices:

- Buy railcards and annual season tickets

<sup>7</sup> <https://www.theguardian.com/uk-news/2016/jun/02/train-ticket-machines-need-clearer-language-jargon-study>

<sup>8</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0019/27334/esa-retail-research-into-passengers-experience-of-ticket-vending-machines-march-2018.pdf](http://orr.gov.uk/_data/assets/pdf_file/0019/27334/esa-retail-research-into-passengers-experience-of-ticket-vending-machines-march-2018.pdf)



- Produce the photo ID cards which are essential for season tickets of a month or longer to be valid.
- Odd period season tickets (longer than 1 month - e.g. 6 weeks and 5 days)
- Season ticket changes - e.g. customer wishes to increase/ reduce the number of zones of their season ticket
- Get refunds Take Rail Travel Vouchers as payment.
- Take National Transport Tokens as payment
- Cancel a ticket for immediate refund if a mistake is made at the TVM.
- Retrieve lost money from malfunctioning TVMs.
- Make seat reservations
- Make sleeper reservations
- Issue Carnet tickets
- Issue all line Rover tickets
- Issue company specific Rover tickets
- Issue Ranger tickets
- Make rail/sail bookings to any station in Ireland (these are walk-up fares for immediate travel)
- Issue car park tickets/give part rebates on one bought from parking machine
- Issue Groupsave tickets (these are available for discounted travel for 2, 3 or 4 people for walk up off peak travel on nearly all routes in the south east).
- Issue replacements for internet sales tickets where the TVM has malfunctioned mid-print.
- Advice the cheapest valid fare – RMT searched for how many there are for a London – Birmingham journey and counted a total of 156! All these have different validities and conditions. The machine – even if it did offer all the fares, which it will not do - won't tell you those restrictions, and even if it did, it would take a PhD and several hours to go through them, so the passenger and the queue behind you would miss their train.
- Any walk-up ticket which doesn't start from the same station, or is not for dated for same day travel. (Most TVMs do not allow this)
- Privilege tickets – most 'unsafeguarded' rail staff (i.e. those who entered service after March 1996) are not entitled to a privilege discount on oyster pay as you go fares. The only way to avoid paying quadruple the correct fare is to use the booking office or risk prosecution/penalty fares.
- Mixed tender payments - e.g. part cash and part card
- Boundary Zone Extension tickets to mainline stations (for travel card season tickets not including Zone 1)
- Discounted advance purchase tickets
- Split tickets and more complicated journeys
- Some machines don't even let you buy a ticket starting at another location. Especially frustrating if you're using your season ticket for part of the journey.
- The ability to pay with £50/ Scottish Bank notes and 1p, 2p and 5p coins
- Refunding last PAYG top-up or whole PAYG balance or using PAYG balance to offset the price of a season ticket (e.g. a customer who mistakenly topped up, when intending to purchase a season ticket)
- TVM's do not all work for those who are without a UK billing address when using a card

- Mainline discounts on single tickets
- Replacing damaged paper travel cards
- Using a ROLT/RLMP to replace a ticket lost in a ticket gate
- Purchasing some of the wide range of mainline tickets - e.g. Advance, Super-off peak, Open singles/ returns
- The acceptance of warrants
- Privilege-rate Mainline paper tickets
- The ability to purchase group tickets for more than 19 people in a single transaction
- Refunding Same Station exits (more than 30 mins)
- Excess fares window (helps deter and offset losses to fare evasion)
- ENCODE – ticket stopped working and needs replacing

RMT calls on London Travelwatch to reject these proposals given the fact that ORR is seeking feedback on its emerging findings and proposed action which it will report back on in 2019.

RMT further believes that an efficient and skilled operator, along with its client Rail for London (RfL) should be working to ensure that the deployment of staff at ticket offices is actually understood as a necessary aspect of an overall sales service, given the evidence that ticket complexity and rip-off pricing is still prevalent in the industry as well as very real serious issues regarding staff and passenger accessibility, safety and security<sup>9</sup>.

### **Cutting costs at a time of rapid growth**

RMT recognises that there is clearly a desire by RfL, a wholly owned subsidiary of TfL, to close ticket offices. We believe that is simply to cut costs and try and plug a gap in TfL finances. RMT believes this is short sighted and wrong. The Overground's primary objective should be to serve passengers and external economic and social objectives related to moving about the capital. Cutting back on the level and quality of service is a false economy.

The cost of staff providing an efficient and skilled service and having a point of refuge / safe space to work from should not be identified as an inconvenient burden especially when passenger journeys on the Overground have increased overall from 102 million in 2011/12 to 190 million in 2017/18<sup>10</sup>.

RMT strongly believes Arriva Rail London should not be seeking this option and should recognise that any reduction in service is not a source of savings. Instead this

<sup>9</sup> <https://www.theguardian.com/uk-news/2018/oct/02/hackney-central-knife-attack-man-stabbed-on-london-overground>

<sup>10</sup> <http://dataportal.orr.gov.uk/displayreport/report/html/2b2e2c38-c822-4e1f-9fb4-b049b3c13899>



important role should be recognised as an essential element in providing a world class service to London citizens, visitors and tourists from around the world.

RMT's own investigation into these proposals has seen no evidence that challenge our view, but we do hear evidence, both subjective and objective from passengers, that these proposals will deliver a significant and adverse effect on levels of service and other benefits that ticket offices bring to a station in respect of security, help for the disabled, vulnerable or technically less able.

### **Attitudes towards staff**

RMT believes all the evidence from your own passenger research and that of Transport Focus supports the view that ticket office staff are valued by passengers. It is certainly the view heavily supported in comments made on RMT postcards and petitions.

Indeed Transport Focus latest report on Passenger attitudes towards Rail staff (February 2016) makes the point that "Train tickets are sold through a number of different sales channels. In recent years there has been growth in the number of 'self-serve' channels, but at present station ticket offices remain the most popular method of purchasing a ticket.....In the course of our research for the Thameslink and Southeastern franchises we asked passengers what their preferred method of ticket purchase would be. With both operators a slightly higher proportion of passengers wanted to be able to purchase tickets online than currently do. However, the most preferred method was still the ticket office. 45 per cent of Thameslink and 55 per cent of Southeastern passengers preferred to use the ticket office. This was more than double the number, in both instances, of those that preferred ticket vending machines".

### **Assistance from staff in a ticket office is vital**

Feedback from RMT members is that passengers are often tentative about approaching them in the ticket hall or on a platform. Even where passengers appear to want advice on a journey or using a machine, they are frequently shy about requesting assistance. Staff can take steps to mitigate this – but obviously within limits. This was of course never the case with ticket offices as the function of staff in the offices was reassuringly clear to everyone.

Where a passenger does require assistance, they frequently have to be referred to other sources of assistance – i.e. to the phone helpline (from where they are often referred back to the station) or online. This is exasperating for them and undermines passengers having a positive perception of the service we can provide as well as the way our railways are run.

In terms of visually-impaired people, where ticket offices are retained, people can learn the route to the ticket office window, but where ticket offices have been removed our members report that such customers are struggling to locate mobile

staff. Furthermore, ticket machines are touch-screen and do not always deploy audio or tactile operation technology, so cannot be used unaided by many visually-impaired people.

In terms of hearing-impaired people, ticket office windows have induction loops, but obviously a mobile member of staff does not. In terms of mobility-impaired people, the design of ticket machines (e.g. absence of a level counter for sorting change) is inadequate. We therefore believe that the steps which will be taken to accommodate disabled users is insufficient to mitigate the loss of ticket offices.

## **Accessibility**

Train and station operators are required by their operating licences to establish and comply with a disabled people's protection policy (DPPP). This sets out the arrangements and assistance that an operator will provide to protect the interests of disabled people using its services and to facilitate such use. ORR approve these policies and monitor compliance with them. A DPPP sets out in detail the arrangements that an operator will put in place to support disabled people using its services. Ensuring that ORR's licensees fulfil the commitments they make to disabled passengers in their DPPPs is a key aspect of ORR's regulatory work.

Each DPPP includes a requirement that all licensed operators must:  
*'Provide assistance to disabled passengers who arrive at a station and require assistance to allow them to travel, but assistance has not been arranged in advance, where reasonably practicable.'*

This type of 'un-booked' assistance is commonly referred to as 'Turn-up-and-go' (TUAG). All ORR's licensees with a DPPP are expected to offer this service.

ARL's current DPPP states for example "If you hold a Disabled Persons Railcard ([www.disabledpersons-railcard.co.uk](http://www.disabledpersons-railcard.co.uk)), please remember to show it when purchasing your ticket at a ticket office". It also makes clear that 28 of the stations listed have an accessible ticket office and counter. RMT is concerned that the problems this decision could create exposes the contradiction inherent in ARL's DPPP which is rightly proud of the fact that "Accessible ticket office windows have been installed at Brondesbury Park, Gospel Oak, Headstone Lane and Queens Road Peckham" only for closure to be proposed.

If the service provided to disabled people by ticket offices is removed this means there will have to be a significant change to the DPPP. RMT's reading of the licence is that ARL shall not establish, or make any material changes to the DPPP unless and until: (a) the PC and, where appropriate, London Transport Users Committee (now London Travelwatch) has been consulted; and (b) the licence holder has submitted the DPPP, or (as the case may be) the proposed change, to ORR and ORR has approved it.<sup>11</sup>

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<sup>11</sup> [http://orr.gov.uk/data/assets/pdf\\_file/0011/2234/lic-passlic.pdf](http://orr.gov.uk/data/assets/pdf_file/0011/2234/lic-passlic.pdf) page 8



We would request a clear statement from London Travelwatch clarifying whether any decision taken as part of this consultation will be seen as the consultation to the DPPP required in the licence conditions above or if this will be seen as a separate process?

RMT will also be writing to the ORR on the significant detriment proposed to the DPPP and call on both parties to reject these proposals.

### **Congestion, queueing and safety fears**

Not all ticket halls are also suited to the placing of large ticket machines and transactions are much more likely to be held up causing queues and requiring staff assistance to correctly complete. Most passengers are not aware of what the industry's guidelines are regarding queueing in peak and off-peak. It would be interesting to know if ARL are monitoring the queues at station as expected by the railway industry.

The lack of ticketing facilities could also impact on revenue if station staff are instructed to let customers travel without valid tickets. This situation regularly occurs at stations and persists for prolonged periods on occasions. We anticipate that the accumulated impact on revenue, will likely have negative consequences for the provision of services.

There are also reasons related to the layout and local setting of the stations that make the case for retaining ticket offices therein especially persuasive. One factor is deterring crime against passengers. We agree with the concerns in this regard of Dawn Butler, MP for Brent Central, remembering the appalling murder of Tom Ap Rhys Pryce<sup>12</sup>. She is correct to state that the ability of staff to safely oversee the ticket hall and safely be able to summon assistance is enhanced by staff being located in and having access to the secure confines of a ticket office.

We will not accept a heightened risk of crime, attacks and robberies by placing staff in potential danger by carrying out the same duties on platforms that have previously enjoyed the security and safety of the ticket office. Do ARL not accept there will be a heightened risk in the future?

### **Conclusion**

We hope that as champions representing the views of passengers, you are minded to oppose the withdrawal of these ticket office services, the maintenance of which thousands of passengers reasonably believe to be in their interests. By rejecting this application and listening to the concerns felt by politicians, staff and user groups representing the disabled, elderly and others with special assistance needs you will

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<sup>12</sup> [http://www.kilburntimes.co.uk/news/dawn\\_butler\\_mp\\_brent\\_overground\\_ticket\\_office\\_closures\\_could\\_cost\\_lives\\_1\\_4374865](http://www.kilburntimes.co.uk/news/dawn_butler_mp_brent_overground_ticket_office_closures_could_cost_lives_1_4374865)

be standing up for all passengers. The support given to passengers and constituents by the Labour Group on London Assembly, councils like Islington and other elected representatives who have responded to this consultation is a reflection of the genuine concern felt by the removal of the ticket offices.

It is clear that the operator may seek to obtain consent from the Secretary of State to amend the TSA but to do so they have to obtain the approval of TfL to the proposal. TfL want London Travelwatch to provide the cover for them to then claim they are only adopting this approach after getting the agreement of the official watchdog.

The fears and concerns of passengers has to be recognised as valid. And the previous conclusion London Travelwatch reached in respect of stations with more than a million entries and exits said they "justify the provision of automatic ticket barriers, staffed ticket offices throughout the operational day and other traits normally associated with larger stations"<sup>13</sup>.

The 185 million exits and entries in 2016/17 is probably getting closer now to 200 million and they will certainly reach it before the end of this decade. RMT therefore believes all these stations need staffed ticket offices and to agree this closure now would be a failure of historic significance.

It is not acceptable to recognise the closure will have implications for passengers with disabilities or who are elderly or vulnerable but give no assurances how these matters will be addressed in the future.

Yours faithfully



**Mick Cash**  
General Secretary

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<sup>13</sup> [http://www.londontravelwatch.org.uk/documents/get\\_lob?id=4401&field=file](http://www.londontravelwatch.org.uk/documents/get_lob?id=4401&field=file)



Station Name	Entries & Exits_Full		Entries & Exits_Reduced		Entries & Exits_Season		1617 Entries & Exits		.516 Entries & Exit	
Acton Central		537,352	721,522	672,990	1,931,864	1,891,098				
Anerley		258,736	386,864	327,412	973,012	887,484				
Brondesbury		510,154	886,450	1,261,284	2,657,888	2,709,888				
Brondesbury Park		314,314	360,114	371,516	1,045,944	1,048,556				
Bruce Grove		207,540	382,818	510,304	1,100,662	990,150				
Bush Hill Park		326,580	392,778	318,450	1,037,808	992,280				
Caledonian Road & Barnsbury		441,754	586,710	809,478	1,837,942	1,764,760				
Camden Road		1,204,378	1,816,256	2,237,074	5,257,708	5,120,672				
Canonbury		781,826	1,285,366	938,190	3,005,382	2,859,228				
Carpenders Park		341,904	583,858	263,294	1,189,056	1,154,092				
Clapton		403,086	627,120	775,524	1,805,730	1,598,734				
Dalston (Kingsland)		1,203,628	2,672,470	2,308,250	6,184,348	5,931,382				
Dalston Junction		1,217,890	2,366,280	1,712,668	5,296,838	5,139,640				
Finchley Road & Frognal		454,716	623,488	1,055,586	2,133,790	2,199,892				
Gospel Oak		692,210	938,418	725,224	2,355,852	2,629,076				
Hackney Central		957,806	1,685,958	2,185,256	4,829,020	5,978,530				
Hackney Downs		1,129,366	1,871,346	900,682	3,901,394	2,266,824				
Hackney Wick		496,630	995,362	648,206	2,140,198	2,103,982				
Haggerston		884,466	1,407,420	931,162	3,223,048	3,187,120				
Hampstead Heath		844,900	1,342,266	1,185,058	3,372,224	3,331,658				
Hatch End		173,946	443,068	95,232	712,246	707,454				
Headstone Lane		122,722	248,264	105,520	476,506	473,014				
Homerton		1,207,604	1,930,600	1,677,372	4,815,576	4,652,282				



Honor Oak Park	815,350	1,215,800	1,040,128	3,071,278	2,969,040
Hoxton	743,016	1,325,522	927,804	2,996,342	2,931,902
Imperial Wharf	870,400	1,000,456	1,262,146	3,133,002	3,290,200
Kensal Rise	638,546	891,088	1,170,498	2,700,132	2,738,450
Kensington Olympia	1,106,210	1,516,430	1,494,968	4,117,608	10,904,840
Kentish Town West	526,182	691,032	808,558	2,025,772	2,011,132
Kilburn High Road	165,484	433,884	329,822	929,190	924,198
Penge West	171,978	289,932	235,036	696,946	640,978
Rectory Road	272,586	355,860	354,488	982,934	939,602
Rotherhithe	414,552	763,242	663,334	1,841,128	1,728,256
Shadwell	1,125,412	1,969,140	1,920,486	5,015,038	4,976,464
Shepherds Bush	1,732,554	2,717,472	3,534,016	7,984,042	8,653,428
Shoreditch High Street	1,810,334	3,378,710	2,665,960	7,855,004	7,661,254
Silver Street	400,724	599,178	580,714	1,580,616	1,389,866
South Acton	235,862	249,150	307,230	792,242	722,238
South Hampstead	84,094	157,942	181,292	423,328	456,228
Southbury	247,702	422,272	269,508	939,482	833,988
St.James' Street	263,790	418,508	477,078	1,159,376	1,016,152
Stamford Hill	135,802	221,068	222,360	579,230	503,130
Stoke Newington	339,654	510,246	517,118	1,367,018	1,165,432
Surrey Quays	902,240	1,825,210	1,943,904	4,671,354	4,214,654
Theobalds Grove	137,918	196,366	79,652	413,936	351,986
Turkey Street	212,528	320,062	178,982	711,572	603,754
Wapping	623,372	1,122,558	737,882	2,483,812	2,464,180
Watford High Street	284,916	1,044,736	113,964	1,443,616	1,441,772

West Hampstead	971,124	1,432,836	2,318,172	4,722,132	4,814,008
White Hart Lane	311,880	606,120	727,056	1,645,056	1,473,144
Wood Street	345,148	495,478	476,734	1,317,360	1,140,006



## **Customer Journey Modernisation Review**

## TABLE OF CONTENTS

Introduction .....	3
Terms of reference .....	4
Customer Journey Modernisation: Report .....	5
Customer Journey Modernisation: Conclusion .....	31
Abbreviations and acknowledgements .....	34





## **Customer Journey Modernisation Station Review**

### **Introduction.**

On the 15<sup>th</sup> of September 2017 Arriva Rail London (ARL) announced that it would be reviewing the roles of ticket offices and looking to close them in an attempt to make staff more visible. Part of this process was to upgrade ticket vending machines and reduce the number of agency roles and create more permanent roles. The restructuring is called “Customer Journey Modernisation” (CJM).

The RMT and TSSA met with ARL management on the 31<sup>st</sup> of October 2017 and expressed concerns over the safety implications of ticket offices closing and the impact it could potentially have on staff and passengers.

We the trade unions requested assurances that all existing staff terms and conditions and rosters were protected and negotiable before discussing ARLs proposal regarding Customer Journey Modernisation. ARL management gave reassurances for existing staff in several CJM meetings and this is reflected in the minutes. The trade unions were also concerned about compulsory redundancies and potential de-staffing of stations, as had been the case when Transport for London made the same announcement for London Underground Limited (LUL) stations. An error which led to a large number of safety critical roles having to be re-instated. ARL management have stated that there are no compulsory redundancies. ARL were, and still to this day reluctant to discuss proposed staffing levels.

Before the trade unions could agree to look at proposed roles or accept the proposal to close ticket offices on the London Overground network, we insisted ARL carry out a station by station review of the network. This was to look at the current working arrangements in an attempt to identify any safety risks around ARLs proposal. We could then constructively and clearly be able to look at the mitigations that may be needed to be put in place prior to any further talks, or before any changes to working environments were agreed.

At the CJM meetings which followed it was established that a smaller group of RMT and TSSA representatives along with ARL management would carry out the station reviews. This would include talking to staff about any safety concerns they may have regarding ARL’s proposal, as it would affect all those grades who currently work in customer services and not just those staff in ticket offices.





## **Customer Journey Modernisation Station Review**

### **Terms of reference.**

In an attempt to work constructively it was agreed that a "Joint Working Group" (JWG) would be formed to carry out the station by station reviews. From the staff side it would consist of a mixture of health and safety representatives and industrial representatives from both the RMT and TSSA.

The ARL management side would consist of the CJM team, local management teams (IOSH qualified) and senior customer experience managers. The JWG would also appoint subject matter experts to support the group as required. It was also stated that the full-time officers for both trade unions would attend the reviews where appropriate.

We would like it noted that at no point during the reviews were any subject matter experts or senior customer service experience managers in attendance. Neither full time officer were invited to attend any review by ARL.

All those who attended the station reviews on behalf of ARL, were picked solely by the ARL management side of the JWG.

It was agreed that the terms of reference presented by ARL would not be prescriptive and in places would be flexible. This was necessary as when the process of reviewing stations commenced the initial scope of stations changed. This was due to ARL's admission that those stations which are currently staffed by agency would be staffed internally. It was also stated in the initial 20 station management report that those stations in which other staff such as traincare are present on platforms they could fill the role of platform supervision. Therefore, we felt it was imperative to include these stations as part of the review process. ARL management declined to carry out reviews at these stations.

ARL management carried out 82 station reviews with the trade unions. The trade unions have carried out an additional 6 station reviews.

ARL management did agree to speak to the Customer Service Ambassadors, Revenue Protection Inspectors, and Ticket Vending Machine teams on the request of the trade unions. Again, this was due to the admission that the restructuring would also affect these grades.

The RMT and TSSA have 88 station review documents as evidence to refer back to, to support our Customer Journey Modernisation Report and Conclusion.



## Customer Journey Modernisation Station Review Report.

The RMT and TSSA joint working group (JWG) consisting of Representatives:

Jonathan Mortimer	RMT
Beverleigh Thomas	RMT
Liam Nixon	RMT
Samuel Addo	RMT
Theresa Opoku-Ware	RMT
Ray McDonagh	TSSA
Abdulhai Mulla	TSSA

The RMT and TSSA representatives with Arriva Rail London (ARL) management have now completed the station by station reviews of the London Overground network and spoken to those staff members affected by the proposed restructuring of roles and closures of ticket offices. These included all 82 stations in the terms of reference and 6 additional stations. Alongside this we had separate feedback sessions with Customer Service Ambassador, Revenue Protection, and Ticket Vending Machine teams.

Whilst visiting each station and consulting with the staff, the trade union reps along with ARL management set out to review the stations and the impact closing a ticket office would have on staff/passenger safety including but not limited to; Staffing levels, roles, facilities, exposure to elements, lone working threats, figures for crimes on the railway (BTP), crimes surrounding our stations (MET), crowd control/pinch points, repetitive strain risks, events, local amenities, local developments, and Equality Impact Assessments (EqIA).

All the information below provided by ARL and sourced by the trade unions was accurate during the time of the reviews. Our conclusions based on these reviews are as follows;

## Staffing Levels:

We found that at all the stations we reviewed the staffing levels were extremely low. According to The Office of Rail and Road (ORR) ARL has a decreased staffing level of 3.6% since November 2017. Most stations and all other customer service facing roles, have had vacancies for many years and are currently being filled with agency staff and the reliance of overtime from existing staff to cover shifts. These vacancies, along with those shifts covered by agency need filling before any proposed staffing levels are discussed.

The agency staff work extended hours and split shifts over a 24-hour period. Their potential fatigue puts those members they are working with and passengers at risk of an accident/incident, the risk is higher if they are left at a lone working station unsupervised. The level of competence coupled with the large area agency staff cover leaves them reliant on the knowledge and experience of internal staff, adding to the already increasing workload of our members. The issues around agency work patterns has been raised by the trade unions with ARL through the appropriate machineries. ARL have neglected to resolve this issue.

Stations where traincare/train presentation are present, they act as a station presence for passengers and often carry out customer service. These are often at some of the busier stations on the network including but not exclusive to; Gospel Oak, Highbury and Islington, Kensington Olympia, Liverpool Street, Dalston Junction, and Stratford. The reliance on their support, going above and beyond their roles masks the staff shortage at these locations.

The above shows us the importance of Platform Supervisors and the need for more, especially at interchange stations. During disruptions, evacuations and other emergencies, it is important to have a person in charge. The Ticket Office staff on duty are currently responsible for the stations in which they work at, as are Station Assistants.

Stations where there are Platform Supervisors their sole responsibility is to provide a safe station environment. They prevent suicides, manage crowd control, MIP/VIP, contractors and maintain a high visible presence.

At Stratford we currently have Operation Supervisors and Operation Assistants. These roles are safety critical roles and we believe should under no circumstances be replaced. This is the same for Train Dispatchers and those Station Assistants who also dispatch trains at other locations. Again, the staff working in these roles go above and beyond and currently assist with customer service duties outside their job descriptions. Majority of concerns were around abusive behaviour from passengers when it came to ticket issues. All staff from these grades stressed the importance of having ticket offices to refer passengers to. Staff in these operational roles also stated the concern of the additional work load which has increased due to staff shortages and increased footfall.

During disruptions and in the event of an emergency we believe that our members are currently at a high risk of physical/verbal assaults and injury due to the current low staffing levels. Those stations that are currently lone working the risk is increased, and even more for those lone working outside.

Staff are left unaided for many hours of the day and have raised concerns over stress levels, exhaustion, the increase in workload (caused by increase in footfall and shortage of staff), and feeling vulnerable, especially during peak hours. The lack of support and visibility from management is adding to this.



Those members currently working in a ticket office raised concerns that they felt safer carrying out roles from within the ticket office, especially when working alone.

Ticket office hours are based on "schedule 17" (mandatory ticket office operating hours as set by the National Rail Ticketing and Settlement Agreement). However, at numerous locations the staff have stated the ticket office remains open past the schedule 17 hours due to the high demand of the services they offer. Some of these ticket offices open at weekends when not required due to the demand, a practice which up until now has been supported by ARL and previously LOROL (London Overground Rail Operations Limited).

Customer Service Ambassadors and Revenue Protection Inspectors stated they use ticket offices to diffuse altercations by referring passengers to them and rely on the staff working in ticket offices for additional support and knowledge. Majority of staff from both grades stated they felt safer knowing that a member of ticket office staff was available for support.

Customer Service Ambassadors carry out a safety critical role on the platforms during peak times. At certain locations on the network they have been removed, which has increased the work load of staff working at those stations. Staff at the stations which currently have Customer Service Ambassadors working have stated the additional member of platform staff has improved issues such as crowd control, disruptions/evacuations, prevented accidents and suicide attempts.

#### **Currently ARL have no lone working policy.**

ARL have chosen to present the information of staffing levels as "full time equivalent" rather than an overall head count with each station/grade vacancies attached. Full time equivalent is based on hours worked. Those that have family friendly arrangements/flexible working and those that are part time roles show as decimal points. We have requested ARL still present a simplified version of this as established roles. We would like to see a headcount and grades of all internal roles, vacancies and those roles covered by agency staff.

The information provided we believe is not entirely accurate and the vacancies may be higher. Woodgrange Park for example shows 2.42 for gateline staff, yet there are no internal staff who work on the gatelines. Dalston Junction has 4 vacancies for Customer Host grade, but this is only shown as 2.00 by ARL. GOB (Gospel Oak to Barking) RPI shows as 0 vacancies, but 4.00 with agency cover. The 4.00 which agency staff cover is in fact the vacancies, this is a reoccurring issue across the figures provided. There are more discrepancies with the information provided as above, therefore we cannot at this time fully assess all the issues surrounding current/proposed staffing levels.

We would have preferred a more accurate graph, which shows our current establishment (minuted positions) and vacancies across the network.

From the figures provided we can see that currently according to ARL there are 150.82 vacancies across the network with a further 212.51 roles being filled with agency staff. This gives us a total of 363.33 vacancies being covered with agency or internal staff as overtime. As stated before we believe that these vacancies which have not been filled over a long period, and the reliance of agency staff has a detrimental effect on our members and puts their wellbeing and safety at risk.

Below are all the current estimated staffing levels/vacancies, figures provided by ARL.







## Lone working:

Having visited/reviewed ARL stations, observed and consulted staff who work at single staffed stations, we believe the lone working model is not safe and strongly advise against it.

The footfall at our stations (please see **Crowd Control**) has increased and is trending to continue to do so. This increases the risk to staff and passengers for assaults/accidents.

Staff that work outside and away from ticket offices/cabins in the stations we reviewed have large distances between themselves and points of refuge/safety. This risk is heightened at lone working stations as there is no additional staff to assist. Blind spots on stations are an issue (unless CCTV is being monitored by colleagues from the ticket office/cabin). Staff at certain locations do not have the equipment (radios) to stay in constant contact when in areas which are out of sight of their colleagues.

The staffing levels are low that staff currently must split up to carry out tasks such as security checks, MIP/VIP, putting themselves at risk. Whilst carrying out the mentioned tasks, passengers have no one else to assist them. This often leads to a delay in their journey and can cause conflict for lone working staff.

Many stations have local amenities close to them that serve alcohol to the public that put staff outside at higher risk of anti-social behavior. Again, those members of lone working staff feel more vulnerable when dealing with intoxicated passengers.

Ticket Vending Machines (TVM) are all on the unpaid side of the gatelines and most in and around station entrances/exits. Staff at certain locations are expected to assist passengers with TVMs despite being next to or over the boundaries of station lease areas. Staff are required to empty these regularly and cannot be lone working when carrying out this task.

Lone working/panic devices vary across the network. The West Anglia stations have mobile panic devices for when staff are required to work outside, although a lot of staff stated they were not briefed/trained on the use of them. The London Overground "classic" stations there are no mobile panic devices. All ticket offices however have panic buttons in them making them the current safe place of work.

Other forms of lone working devices such as mobile phones again varied across the network. A lot of the stations experience poor phone signal or WIFI coverage issues. Most of the East London Line core route that are underground have limited signal making the phones redundant in an emergency. In these stations the staff would have to rely on the landline and CCTV in the ticket office being monitored by colleagues. Staff radios vary across the network with stations that are lone working having them, and those that have more than one staff not having any at all. The distribution of these needs addressing company wide.

Roaming PA devices, we believe are an essential tool for all ARL stations, especially those which are lone working. Currently station staff at lone working stations rely on returning to the ticket office/cabins to make announcements.

Stations that have a high suicide attempt rate, such as the DC & West London Line currently could not be lone working. These stations have designated Network Rail staff acting as suicide prevention. The need for these additional staff leads us to believe that currently these ARL stations are under staffed.



We noted a small number of gated stations that are currently lone working. We advise against this practice as it puts the staff at a heightened risk of assault. It also puts passengers safety at risk due to staff not being able to monitor the gates effectively whilst carrying out other duties.

There are numerous stations on the network that require staff to walk on public footpaths due to the multiple entrances/exits they have. This is a dangerous practice as staff are currently not insured outside station boundaries and in the event of an accident/assault would have to claim through a third party. This is also an issue when staff are requested to take VIPs or vulnerable people to rail replacement services alone. Rail replacement bus stops are large distances away from stations and are not covered by CCTV.

The EqIA (Equality Impact Assessment) requested by the unions for ARL to undertake would partially cover which staff could potentially lone work and the impact on passengers at those stations proposed to have a decrease in staffing levels.

Once again Arriva Rail London's lack of a lone working policy is something we believe needs rectifying.



## **Crimes on stations:**

The British Transport Police (BTP) figures provided by ARL were limited and only covered February 2017 to February 2018. Because of this we were not able to assess the risks staff face fully, and if staff safety/wellbeing would be at threat. We are unable to see whether there has been an increase or decrease in crime on stations.

Both trade unions have requested more data from ARL.

The data we as trade unions have been able to source from the British Transport Police is as follows:

### **Violent crime stats for all 83 Stations**

36 Stations have shown an increase in violent crime by 42.5%.

26 Stations have shown a decrease in violent crime by 31.5%.

21 Stations have remained the same which is 26% of our network.

### **Station crime stats on all 83 Stations**

53 Stations have shown an increase in crime by 63.5%

21 Stations have shown a decrease in crime by 25.5%

9 Stations have remained the same which is 11% of our network.

### **On train crime stats on all 83 Stations**

43 Stations have shown an increase in crime by 51.5%

28 Stations have shown a decrease in crime by 33.5%

12 Stations have remained the same which is 15% of our network.

Looking at the above as a whole there has been a large increase on crimes on our network.

Averaging the percentages shown there is an increase of crime by 52.5% overall on ARL.

There has been a significant reduction in British Transport Police officers on the overground. The lack of visibility and support from BTP has been a concern at all stations and that of the Revenue Protection Inspectors and Customer Service Ambassadors.

For staff who work in environments such as ticket offices into customer facing roles, the risks of verbal and physical assault must be addressed fully, and safeguards put in place.

Staff have raised concerns over how the reporting of antisocial behaviour and the lack of support has left them feeling vulnerable and unable to carry out their various roles. When staff report assaults they have fed back that the emphasis is put on them and not the perpetrator. The lack of support and empathy from management has led to staff stating they are now reluctant to report a crime. This not only influences morale but has led to crime figures not being a true reflection of the current levels.

## Crimes surrounding stations:

Again, the figures for Metropolitan crime and other constabularies provided by ARL were limited, this time only providing a snap shot of crime figures for November 2017. Again, because of this we were not able to assess whether there has been an increase or decrease in crime surrounding the stations. We were not able to assess the risks staff face fully, and if staff safety/wellbeing would be at threat.

Both trade unions have requested more data from ARL.

Both trade unions have found data for the last 12 months for crime rates surrounding our stations. Below is an average of reported crimes per month, per line.

### Met crime stats on a monthly average

**North London Line** (between Stratford and South Acton) 64.5 crimes.

**East London Line Core and Southern stations** (Dalston Junction and West Croydon/Crystal Palace/Clapham Junction) 51 Crimes.

**Gospel Oak and Barking Line** (Upper Holloway and Barking) 46 Crimes.

**DC Line** (between South Hampstead and Watford High Street) 41 crimes.

**West Anglia inners** (between Bethnal Green and Chingford/Cheshunt/Enfield Town) 51.5 crimes.

**West London Line** (Willesden Junction and Clapham Junction) 81 Crimes.

We as trade unions also looked at crime rates in the 30 boroughs that our network covers.

Below is the London Boroughs crime rates over a 12month period, February 2017 to February 2018.

Camden	27.35%	↑	Waltham		
Redbridge	17.02%	↑	forest	6.23%	↑
Westminster	15.97%	↑	Hammersmith		
Islington	15.71%	↑	and Fulham	5.98%	↑
Richmond	14.88%	↑	Hackney	5.35%	↑
Newham	10.89%	↑	Barnet	5.35%	↑
Kingston	10.80%	↑	Greenwich	5.34%	↑
Bexley	10.57%	↑	Wandsworth	4.92%	↑
Enfield	10.04%	↑	Merton	4.25%	↑
Hounslow	9.33%	↑	Tower Hamlets	4.21%	↑
Kensington and			Southwark	3.99%	↑
Chelsea	9.07%	↑	Harrow	3.76%	↑
Brent	9.05%	↑	Lewisham	1.94%	↑
Hillingdon	8.99%	↑	Croydon	0.70%	↑
Havering	7.91%	↑	Ealing	0.47%	↑
Haringay	7.15%	↑	Lambeth	0.41%	↓
Barking and					
Dagenham	6.24%	↑			

Out of the above 30 London Boroughs 29 have increased crime rates over the last 12 months and have only seen one decrease in the same period.

Crime rates around our stations must be taken into consideration by ARL. Austerity does not stop at the boundaries of a station and the surrounding environment has an effect on our members safety and security. Those working outside are at a greater risk than those in the safety of a ticket office.

## **Points of Refuge/Safety:**

On all London Overground stations reviewed we have found that the main point of refuge/safety is the Ticket Offices/staff cabins.

These areas all have a panic button, landline and a secure lockable door. There are issues in certain locations regarding the quick access to ticket offices once staff are outside. Staff are able to monitor CCTV if needed, i.e. In times when observing antisocial behaviour from a secure safe distance.

Although ARL staff are currently not first aid trained, ticket offices are where first aid supplies are kept and ill passengers are often taken there whilst waiting for paramedics.

Fire extinguishers are stored in ticket offices and staff need quick access to these in an emergency.

All contractors and visitors are briefed from the ticket office and sign in and out from there. Ticket offices are the main points of safety and point of contact for all those that come onto stations.

The majority of stations had no other points of safety along platforms (with the exception of some stations on the south section of the ELL core). We believe our members currently working outside and those proposed to do so are currently at risk, especially those roles that require staff to work on platforms.

Some stations have other offices/store rooms on stations/platforms that could be converted into places of safety in an emergency but would need to be assessed on a station by station basis.

Not all gatelines have booths/pods for staff. Those that did, have issues with access and securing the doors. This leaves staff open to risks such as not being able to access the points of refuge or secure themselves safely and quickly in the event of an assault.

During busier periods and disruptions staff working away from points of refuge are at a higher risk of assault due to not being able to get back to any point of safety. There is a lack of help points (emergency buttons) towards the far ends of platforms.

CCTV coverage needs addressing as many of the stations (especially on West Anglia route and ELL south) had numerous blind spots and areas with no coverage.

With the installation and positioning of the new TVM machines, concerns have been raised as to the distance between the ticket office and machine. This also creates issues of staff having blind spots and safety issues. The risk is increased when staff are required to carry money to and from the TVM.

All the above concerns add to the safety risks when staff are working away from ticket offices/staff cabins.

### **Footfall data/Crowd control/Pinch points:**

The footfall data provided by ARL during the reviews sourced from The Office of Rail and Road (ORR) is inaccurate and misleading.

Firstly, it is an “estimation” of station usage as stated by the ORR. The information provided only accounts for those passengers that enter/exit London Overground stations using their Oyster cards. It does not include the following:

- Passengers that travel via ungated stations.
- Interchanging passengers (who may use the station and ticket office for information purposes)
- Persons who use stations as a walkway or right of way.
- Members of the public who purchase tickets from ticket offices or TVMs but do not use our services (ticket on demand/prepaid, one day bus pass)
- Passengers traveling on event days when gatelines are left open to help with crowd control issues
- Periods of the service when gatelines are not in operation and the wide gate is left open
- Members of the public using stations and ticket offices for information and customer service purposes only
- The figures do not account for passengers who use contactless bank cards or apple/android pay services.
- Large booked groups of people with letter of authority to travel.

Secondly the data provided by ARL was for only one year (2016/2017). We were unable to ascertain whether the footfall at stations had periodically increased/decreased. This is vital information that we would need before looking at proposed staffing levels. This would allow us to estimate the rate of natural increase (RNI).

All stations reviewed experienced crowd control issues at the ticket office windows and by the TVMS. These were more apparent during peak times. Shortage of staff at ticket offices windows has left some stations with just one window. This causes a larger single queue and increases the work load of current staff. The placement of new CUBIC machines on certain locations causes queuing conflicts with ticket office windows and gatelines.

Tops/Bottoms of stairs and lifts are also reoccurring pinch points for all stations on the network. These areas again are busiest during peak times. Limited stations have queuing systems for stairs, something we feel should be mandatory at all stations to prevent accidents and overcrowding.

Platforms have areas that are too narrow (pinch points) and when they become over crowded, not only are they not safe, but restrict the members of platform staff to one area and obstruct their view and path to points of safety.



Waiting shelters and passenger behaviour cause pinch points and crowd control issues. During bad weather passengers tend to congregate in waiting areas and under stairs for shelter. This leads to passenger conflict with those exiting and entering trains. Having observed passenger behaviour on platforms, regular users tend to use the same train doors which leads to congestion.

ELL core is the only route to have Integrated Safety Management Systems in use (ISMS), something we feel all stations need. Most stations on the network have trains arriving within close proximity of each other causing additional overcrowding and strain on those working outside. The overcrowding issues on all stations have staff stating they feel more vulnerable when working outside.

No ARL stations reviewed have any form of a working queuing system in place which was reflective of the layout or manageable by staff. We feel those that have narrow platforms/walkways or smaller booking halls/gateline could benefit from these. They would help in an emergency/evacuation and for general crowd control purposes especially during peak times.

## **Noise Levels:**

For those working outside the ticket office there is a reoccurring concern regarding noise levels and prolonged exposure. We could not source anything in the current task risk assessments to show this has been assessed. Trains including freight, run at 80 decibels at 15 metres away on average. Our staff working on platforms and outside are much closer than this which we believe may bring the noise levels above 85 decibels.

The minimum requirement before noise must be assessed in the workplace is 80 decibels, with 85 being the level employers must provide protection. This is based on the advice of the control of noise at work regulations act 2005.

With the addition to this we have frequent public announcements on stations and during the peak times large crowds.

The majority of ticket offices are next to busy roads and bus stops. This again adds to the noise levels.

Contractors currently working on stations, including fault fixing, maintenance and upgrade work, using drills and other power tools are allowed to do so without any assessment made on the effects to staff wellbeing.

The only staff safeguarded from this currently are those working in ticket offices.

## **Exposure to elements:**

Unlike London Underground Stations (LUL), ARL stations are more open and exposed to weather conditions. The majority of the London Overground network are not section 12 (sub-surface) stations.

The working environment for those not in ticket offices is dependent on the weather and the hazards associated with this vary on a daily basis.

Thermal comfort has two extremes. Firstly, the cold weather in winter months and secondly the sun/heat in summer months.

The low temperatures can cause cold stress to staff and long exposure to this can be detrimental to the immune system. Thermals which are provided do not protect staff from prolonged exposure to cold and wind.

The hot temperatures during the summer months can attribute to heat exhaustion.

Both hot and cold conditions have left staff complaining of fatigue, and the Management for Attendance (MFA) procedure does not accept these factors. Staff state they feel penalised for going off sick with cold and flu like symptoms.

The current task risk assessments for those working outside do not cover "thermal comfort" and any preventative measures to reduce risks associated with its effects.

Lack of shelter on stations puts staff at further risk. One of the risks is the exposure to ultra violet rays. Staff that currently work outside of ticket offices have little protection from this and there are no mitigations put in place. Items such as sunglasses to protect eyes are an example of what staff stated they feel would be beneficial.

ARL does not provide suitable changing and drying facilities for staff working outside. Staff have also raised the concern for the lack of waterproof clothing. A water-resistant jacket is the only current personal protective equipment supplied to those who request it.

The overall uniform has been a reoccurring concern raised during the reviews. There is only one uniform supplied to frontline staff at present. The trousers for example are only suitable for those who work in an air-conditioned environment i.e. ticket office. Staff have stated the trousers are too thick and heavy especially when working outside in hot temperatures. LUL staff are provided polo shirts as an alternative to buttoned, tucked in shirts to help with heat. This matter has been brought up on a number of occasions with ARL, but they have repeatedly stated that the uniform has been implemented by TfL.

Members of staff that work on gatelines have overhead heaters provided. At certain locations the heaters are not placed where the member of staff is required to stand. The heaters are insufficient in windy conditions, and we believe due to their size are insufficient.

There are no heaters or booths for staff working on platforms and all other areas outside.

Before any further staff are proposed to work in these environments, ARL needs to address the above issues and put in place necessary reasonable measures to protect staff's health and wellbeing. Ticket office staff are the only grade protected from these risks.



## **Repetitive strain:**

Staff members are at a high risk of repetitive strain across all stations. This is mostly caused by the overall size of stations including; large station entrances, surrounding boundaries, length of platforms, and flights of stairs/ramps. Those lone working have an increased risk due to the additional workload.

Grades that stand for long periods of time especially Station Assistants, Gateline, RPI, CSA, and Train Dispatch are at a higher risk of injury. Standing for long periods on a regular basis can cause sore feet, swelling of the legs, varicose veins, general muscular fatigue, low back pain, stiffness in the neck and shoulders, and other health problems. Standing effectively reduces the blood supply to the loaded muscles. Insufficient blood flow accelerates the onset of fatigue and causes pain in the muscles of the legs, back and neck (these are the muscles used to maintain an upright position).

Prolonged and frequent standing, as with gateline staff, causes blood to pool in the legs and feet. When standing occurs continually over prolonged periods, it can result in inflammation of the veins. This inflammation may progress over time to chronic and painful varicose veins. Excessive standing also causes the joints in the spine, hips, knees and feet to become temporarily immobilized or locked. This immobility can later lead to rheumatic diseases due to degenerative damage to the tendons and ligaments (the structures that bind muscles to bones).

Stations that have rosters with just one day rest between late to early shifts have less time to recover and this can heighten the risk to the above.

Adding to this, shift lengths and break times/frequency are a concern to staff.

The weight staff are expected to carry is a risk that is increasing. Firstly, there are more MIPs on the network and the frequency of lifting heavy ramps has increased. With additional TVMs being introduced there are larger weights being carried across lengthy distances. RPI's are required to carry heavy rucksacks with equipment including, oyster validators, notebooks, ticket printers, and spare batteries. CSAs and GPRs also have to carry their personal belongings with them as they have no hub or lockers.

Another repetitive strain issue staff member's deal with is opening stations on their own and having to manually open large gates. Opening/closing of heavy shutters on TVM cages. These cages do not have handles and are awkward.

Security checks must be carried out 1 - 4 hourly and covers the whole station usually by one person. This includes multiple flights of stairs and full lengths of platforms. Those stations that have secondary means of escape (SME) are part of the security checks and often are long distances. At some stations the security checks can take up to 35 minutes.

### **Current PPE provided:**

Employers must provide the correct Personal Protective Equipment (PPE) for staff and ensure it is looked after. We have noted that this is not the case for many staff on the London Overground network.

Staff across the network are provided thermals. As stated above we do not believe they are sufficient for prolonged exposure to the cold. No staff currently are provided suitable waterproofs or places of changing/drying and storage.

Safety shoes are dependent on the location and the tasks required. We believe staff should be provided safety shoes throughout the network and they should be suitable for long periods of standing/walking.

Gateline staff have anti-fatigue mats which relieve some of the pressure on muscles and joints for short periods. Those working on platforms for extended periods or those mobile members of staff do not have anything to lower the risk of muscle fatigue. Not all gatelines have perches/seats for staff to take a comfort break.

All ticket offices have panic buttons. Incorporated West Anglia stations have roaming panic buttons for when required to leave the ticket office. Station Assistants informed us they used to have these, but they were removed, despite being lone working outside.

As stated above briefly in **Exposure to elements** the current uniform is not fit for purpose for those working outside. Staff have raised concerns over the weight of items including trousers, and the insufficient warmth during the winter. As a matter of safety staff are requested to wear HI-Visibility jackets and these once placed over coats can become restrictive. They are also non-breathable, and in the summer make staff sweat more and dehydrated. The fabric and weight of uniform is something that must be addressed.

PPE across the network needs addressing before any proposed change of work due to the inconsistency provided and relevance to tasks.

## **Equality Impact Assessment (E.q.I.A):**

An Equality Impact Assessment has not yet been carried out by ARL. We are concerned about this not being done before proposing to close ticket offices, as we do not know how it will impact those individual members of staff/passengers who are disadvantaged or vulnerable.

The purpose of an Equality Impact Assessment (EqIA) is to make sure any proposed changes do not discriminate and that, where possible, promotes equality. It should cover the impact of any proposed changes to staff and passengers using our services.

ARL has a legal responsibility or duty to assess and then protect people from discrimination on the basis of the following protected characteristics:

- Age
- Disability
- Sex
- Sexual orientation
- Gender reassignment
- Race
- Religion or belief
- Pregnancy and maternity
- Marriage or civil partnership

This involves anticipating the consequences of any proposed changes to staff and the effect to them and services provided to passengers. Making sure that, as far as possible, any negative consequences are eliminated or minimised and opportunities for promoting equality are maximised.

## **Ticket offices, TVMs and Ticketless Travel:**

Although for the most part the station by station review looked at the safety implications on staff and passengers if the ticket office were to close and associated risks, we also assessed the services provided.

Passengers using the ticket offices at present can:

- **Encode Exchange.**

Once the magnetic strip is damaged or the information on the front of a ticket has faded this can be replaced, to then work on gatelines and be read by Revenue Protection Inspectors.

- **Pay via Warrants.**

Those passengers who are usually vulnerable passengers and are given warrants by social services, probationary services and local councils, can redeem these at ticket offices only. HM forces and businesses also use this service.

- **Duplicate tickets and changeovers.**

When a passenger loses a season ticket they can have a duplicate issued. If a passenger wishes to change the zone or destination of a ticket the ticket office can change it (changeover). Currently there is no other efficient way of rectifying these issues.

- **Advanced purchase tickets.**

Currently ticket offices are the only means of buying a ticket for a destination up to 3 months in advance and be able to rectify the date if required. You can also upgrade a ticket.

- **SILK arrangements.**

SILK (Stranded Information Location Known) is when a passenger (sometimes vulnerable) has no means of payment for a ticket. Someone on their behalf can go to a ticket office in a different location and purchase their ticket for them for a fee. (The trade unions were informed SILK is being withdrawn across the network, at functional level.)

- **Rectifying Oysters.**

During disruptions or if a passenger accidentally taps in on a validator the ticket office can correct this transaction. This is not the same as a refund.

- **Non Issues and Ticket Cancellations.**

Non issues are tickets that have been incorrectly purchased and the passenger would like to exchange it for a different one. The ticket office can cancel this and reimburse or exchange the ticket if the ticket had just been purchased at that station.

- **Excess fare.**

Passengers who wish to change the destination of a ticket can extend the journey or change it from a single to a return by paying the difference. You can also upgrade a ticket.

- **Short change vouchers.**

If a ticket machine does not have sufficient change it will produce a voucher which can only be redeemed at ticket offices.

- **Photocards & national railcard replacements.**

Certain tickets need a photocard to travel with. Replacement photocards can be printed and authorised at ticket offices. This is also applicable to those who lose railcards.

- **Interpret tickets/Oyster.**

Passengers requesting printouts and information regarding oyster cards can obtain this information at ticket offices only. When a Revenue Protection Inspector disputes a ticket the ticket office staff can check the authenticity of the ticket via the FASTIS.

- **Staff Privilege tickets.**

Staff requesting discounts of up to 75% must do this via the ticket office. This includes point to point, and season tickets.

- **Applying discounts to Oyster.**

Passengers who wish to add discounts to oysters such as; Bus and tram and National Railcards.

Ticket offices functions are more than just selling tickets and oysters. They are an information HUB and are the only location on stations with the tools to give accurate and up to date information without having to carry expensive IT equipment on your person.

Ticket offices are where most passenger announcement systems are located. These are mainly used during evacuations and disruptions.

Train Management Information System (TMIS) is located in all ticket offices.

As stated earlier the ticket office is equipped with CCTV which staff can monitor passenger behaviour from a secure location.

After the closure of ticket offices on London Underground Limited, by 2015 a report by Labour Group, Greater London Authority (GLA) claimed there had been an increase in ticketless travel by up to 200%.

ARL have provided ticketless travel figures but these are solely based on surveys and are snapshots of the network.

Station staff including those who operate the gatelines, Customer Service Ambassadors, and Revenue Protection Inspectors stated that they have stopped challenging those who push through gatelines and fare evade and have also stopped reporting it due to lack of support and safety concerns (as also stated in **Crimes on stations**). This leads us to believe that ticketless travel is potentially higher than the figures provided.



Revenue Protection Inspectors in a feedback session all stated that the lack of BTP has led to them feeling unable to challenge those fare evading. The dependency of agency staff and the lack of ticket knowledge for agency staff was a concern. The agency staff are more dependent on the knowledge of ticket office staff when working without ARL RPIs.

There has been a suggestion by management to RPIs that they may introduce body cameras as a deterrent. We are against this as we believe increasing numbers of staff is a safer alternative. CCTV only can tell you who has committed a crime and there are conflicting opinions on whether body cameras act as a deterrent or makes fare evaders more hostile. All RPIs at these sessions and station staff we have spoken to are opposed to body cameras.

Ticket Vending Machines (TVMs) and CUBIC machines are an alternative to ticket offices and only mirror or compliment the services provided by ticket offices.

Some staff that work outside of ticket offices and assist at TVMs have basic knowledge of tickets and have not been trained on the different types of tickets, and oyster services. Station assistants have taught themselves through trial and error and have requested training regarding tickets.

Staff whenever they have issues with TVMs, tickets, oyster rectification or warrants have to refer passengers to ticket offices. Without this option they would be left vulnerable to verbal and physical assault.

Staff at all the stations we reviewed stated that there are currently massive reliability issues with TVMs and when faulty are not fixed in a reasonable time.

Common reoccurring issues (not exclusive) are;

- Note/coin jams
- Machines freezing and stalling
- Short-change issues
- Loss of monies
- Oyster “hi jack” issues
- Screen visibility in sunlight
- CUBIC machines once full of change, the machine shuts itself down
- Card only or cash/coin only issues
- Problems loading coin and note boxes, including weight of boxes
- Machines are exposed to adverse weather which means staff are also if assisting at one.
- CUBIC 24-hour delay for rectifying faults
- Different cashing up/TVM shift sheets for different machines
- LOOMIS collection can sometime cause faults
- TVM positioning on stations and risks associated
- Passengers are not familiar with functions of TVMs

The TVM team who are the first point of contact raised the concern of the small size of their team and the increased workload with additional machines being installed daily. They also work in constant fear of assault and robbery due to sorting out money related issues on TVMs that are all placed on the unpaid side of gatelines. They have no personal panic alarms.

Staff who have been briefed on the new CUBIC machines have fed back that they do not feel safe having access codes to opening the machines put on their personal staff Oysters.

Stations that are lone working cannot open TVMs even if they are trained due to the risk of robbery.

Before any ticket office closure proposals are put forward we strongly advise ARL to look deeper into the implications towards ticketless travel, TVM issues and fare evaders.

At this time there has been no task risk assessments carried out for the new CUBIC machines, and at certain locations Worldline TVMs.



## Events/Local amenities:

All ARL stations are direct routes or connections to large events and shopping centres/High streets i.e. Notting Hill Carnival, festivals, Westfield shopping centres, London Marathon and sporting events. For larger events, stations which are close by or adjacent to venues have additional staff support. This is not the case for all events and some staff have complained that the additional workload and security threat leaves them feeling vulnerable

As referenced in **Local development** there will be an increase of passengers due to capacity improvement at some venues which host events. These upgrades will allow venues/locations to increase the frequency of events. Notting Hill Carnival has also grown in capacity with up to 2 million in attendance. Wireless and Love Box are also held in close vicinity to many ARL stations.

At stations where there is currently lone working such as Crouch Hill, staff deal with these large crowds on their own putting staff members at risk as platforms can become over crowded keeping them from their points of refuge. All events pose a high risk to safety, this is not only due to additional footfall and overcrowding. Events serving alcohol can lead to higher antisocial behaviour. In the warmer weather those passengers who are intoxicated can become dehydrated leading to illness. These examples are just some of the reasons why we believe staff should not be lone working during events.

Staff are at a higher risk of theft and assault whilst using expensive IT equipment, especially when assisting passengers during large events. Ticket offices and cabins are a more secure location to provide this information, especially to those who are under the influence of alcohol. Once again ARL will need to address these concerns before proposing to close ticket offices and bring those staff outside and away from a safe environment.

## Local development:

The population of London has grown twice the national rate of the U.K since 2011 and in the next ten years the Office for National Statistics (ONS) predicts that the population in London could reach in excess of 10,000,000. Last year there were 8,552 new homes built in close proximity to London Overground stations with a further 12,526 expected to be completed by 2019. Newham, Waltham forest, Barking and Redbridge, and Hackney being examples of boroughs already affected.

Due to the upgrades and increased frequency of ARL services, living in close proximity of the stations has become desirable for many commuters and has prompted more development works.

As stated above in **Events/Local amenities** Venues which host events has increased as has the capacity of some of the venues. This poses a safety risk to those working outside and the current staffing level to deal with these events.

Transport links and services are changing and should be factored into the station review.

Using Dalston and Hackney as an example, local bus routes including the 277 and 48 have been reduced. This will have an increase in passenger's using our services. Transport for London is advising passengers who use the 277 to use alternative routes such as the London Overground between Dalston and Highbury.

There are also new train services planned, including the extension to Barking Riverside, which also has new homes being constructed.

Inline with the increase of the population in London there has been new Westfield shopping centres built with another currently being constructed close to West Croydon station. This with other various projects is to accommodate the ever-growing population such as the conversion of the Olympic village into residential properties, and the regeneration of Hackney Wick. London again has seen a retail spending increase by 2.2% average for the last three years. The largest in Europe.

The increase in all developments show the need for an increase in staffing levels on all London Overground stations.

## Facilities:

The facilities available for staff on stations varied across the network. Out of the 82 stations we reviewed the majority (65) had ticket offices, which offered the full range of tickets and services.

Not all the stations had separate mess rooms away from ticket offices/work stations for staff to take an uninterrupted break away from their place of work. Those that did not have separate mess rooms have uncomfortably small or restricted work environments. We noted a high level of clutter in most ticket offices/work stations, including poster bins, ticket stock, service disruption kits (boxes), "A" frames, TVM coin/note boxes etc.

Large IT equipment including PC towers, printers, server cabinets for CCTV, and customer information screens not only take up space but cause additional concerns. They are often noisy and produce additional heat which can make the work environment more uncomfortable over long periods. Stations where there are more than one member of staff working can prevent colleague's from having an uninterrupted break during their shift.

If staff work at a poorly designed workstation it can have a detrimental effect on their wellbeing and risk further health complications. We believe a lot of the work stations do not comply with the 1992 DSE Health and Safety regulations. We therefore request all managers re assess the current work stations staff in ticket offices are required to work from.

Staff raised concerns regarding the lighting and ventilation of mess rooms and work stations. The heat from electrical equipment and the lack of non-controllable lights (sensors) adds to staff discomfort. The lack of ventilation in work areas and mess rooms is inadequate with the only source of fresh air coming from the small opening on ticket offices windows. Air conditioning units have caused staff to raise concerns over dust and allergies, this is not the same at all locations, but as mentioned above each station will need to be assessed and again mitigations put in place.

Toilets at certain ticket offices/work stations were next to the place of work (less than 1 meter) with no partition or separate door. Some of these (Gospel Oak to Barking line) have vents on the door leading to the work stations, where staff are also expected to take breaks. This is unhygienic and prevents staff from using these work areas once someone has used the toilet.

There should be suitable seating areas for staff to take breaks and it should be clean and located in an area where food will not get contaminated. Looking at the above concerns raised by staff and station reviews this is not the case.

Store rooms on stations, only a few have lighting or suitable flooring. These areas which contain grit or winterisation equipment also doubled up for cleaners supplies and were next to electrical equipment. Finchley Road and Frognal as one example had a tap installed next to the server cabinets. These areas are hazardous and staff if required to use should at a minimum be provided safety footwear. The store rooms without lighting such as Dalston Kingsland should not be accessed by staff.

No stations have changing and drying facilities or suitable areas to store any personal protective equipment. Currently staff at their own risk are advised by ARL to use toilets for changing. There is no drainage in the toilets, and it is unhygienic.

Facilities provided including the above mentioned have been neglected over time and if ARL are proposing to improve the service provided for passengers they must first improve the working environment for staff. This will reduce sickness/injury and help improve productivity and morale.





## Customer Journey Modernisation Station Review

### Conclusion.

Based on the evidence and findings contained in the RMT and TSSA **Customer Journey Modernisation Report**, and 88 station reviews our conclusion is as follows;

We the trade unions do not see the benefits to passengers or staff regarding Arriva Rail London proposal to close ticket offices and restructure grades. We believe it poses a safety risk to both the staff that work at these stations and passengers who use our service.

The closure of the ticket offices, restructuring of grades, and potential de-staffing of stations would reduce the customer service level provided and increase the threat of verbal/physical abuse, accidents, and terror threat level.

ARL are currently operating their stations with a minimal staffing level model. Due to the high numbers of vacancies and those roles covered with agency staff. To modernise or enhance the customer experience, we believe keeping ticket offices open and having more staff to provide customer service and a station presence from first to last train is important. These staff should be internally trained staff, be safety conscious, and above all else be provided the facilities and tools to carry out their roles safely. Currently the only grade with the tools to safely carry out their role are those that work in ticket offices.

The continuous failure to consult trade unions regarding health and safety and reduction in staff over the years, has led to the overall working conditions to deteriorate. The risks to members and passengers health and safety have increased as a result of this.

The London Overground Network has expanded over the last 10 years. Since the time of the network being taken over from Silverlink in 2007 the network and services provided has increased. This includes the incorporation of Southern services in 2009, the opening of the East London Line in 2010 and the incorporation of West Anglia routes in 2015. The frequency of services on these and all other routes has increased due to the demand with some services running 24 hours at weekends. The population surrounding our stations has risen during this time. Due to its success and high demand the passenger numbers have therefore increased and so has the risks associated with the larger numbers. Unfortunately, with the increase in numbers there has been a decrease in staffing levels. The risk assessments and mitigations in place have stagnated. Once again, we believe this is due to the lack of engagement with the trade unions.

Crime has increased on not just the network but also in the boroughs that our services serve. The unwillingness from ARL to provide more in-depth British Transport Police crime figures over a longer period and no "Urban" crime figures during the station reviews has been unacceptable. With no evidence to suggest otherwise, based on our **Customer Journey Modernisation Report** findings

regarding crime and footfall, we cannot accept the proposal to move those staff out of safe working environments such as ticket offices. Coupling with this ARL have reduced the number of BTP officers on the network to save cost since 2016. In the last six months ARL have had to re-establish some officers due to the increase of crimes and begging on the network. Currently there are only 6 designated British Transport Police officers to cover the entire London Overground network. Those staff that are required to challenge ticketless travel and antisocial behaviour have been left more exposed and reluctant to do so.

CCTV needs improving on stations in areas on the network, but we do not suggest staff are reliant on the use of it, as it will only tell you who committed the crime and may not deter offenders. The mitigations put in place should always be preventative and not reactive.

Other than the ticket offices, the only other suitable place for staff to work from are those stations that have staff cabins. The risks associated from working away from these locations is again outlined in the **Customer Journey Modernisation Report**.

Station layouts and the lack of safe places of refuge are a major concern, as is the overall level of communication devices, and personal protective equipment provided. There are numerous blind spots away from colleagues and areas in which mobile device signal/Wi-Fi does not work. Again, these concerns have been raised through other machineries, with no resolution.

We believe that increasing the staffing levels would help with staff fatigue and provide additional support during our busier periods (peak times). Additional staff during disruptions/events in which passengers can become abusive or ill is essential to diffusing situations or controlling crowds more efficiently.

The weather conditions staff are exposed to has not been addressed fully anywhere in ARLs task risk assessments. The concerns raised by staff across the network seem to have until now been ignored.

There are a lot of services that ticket offices provide which ticket vending machines currently cannot. These are outlined in our **Customer Journey Modernisation Report**. This demonstrates the customer service value ticket offices provide.

Most importantly closing ticket offices will mean no brightly lit focal point – particularly at night for passengers to go to, and without them it may encourage crime in areas to encroach onto our stations.

During this process the trade unions have requested data from ARL including; crime figures on and around stations/trains, staffing levels (current and proposed) and vacancies, ticketless travel, Lennon data (Latest Earnings Network Nationally Over Night), current and proposed equality and impact assessments (for staff and passengers). The information requested has not been forthcoming or complete. A lot of it has many inaccuracies as highlighted in our **Customer Journey Modernisation Report** and has left us unable to fully and practically assess safety risks associated with ARLs proposals.

The body of evidence contained in our **Station Reviews** and **Customer Journey Modernisation Report** has highlighted across the network currently and proposed, safety is being left to chance.

We therefore advise ARL to reconsider the proposal of closing ticket offices. Firstly, look at the current working environment and practices before continuing with customer journey modernisation restructuring. ARL then must put in the necessary mitigations to safeguard passengers and our members before looking at proposed working models based solely on priced options.





## Customer Journey Modernisation Station Review

### Acknowledgements and abbreviations.

The staff side CJM team consisted of;

John Leach & Brian Whitehead <b>RMT</b> (Regional Organisers)		Mel Taylor time official)	<b>TSSA</b> (Full
Jonathan Mortimer	<b>RMT</b>	David Kavule	<b>RMT</b>
Beverleigh Thomas	<b>RMT</b>	Richard Crossman	<b>RMT</b>
Liam Nixon	<b>RMT</b>	Daljit Dhanoa	<b>RMT</b>
Samuel Addo	<b>RMT</b>	Sellathurai Sivathanan	<b>RMT</b>
Theresa Opoku-Ware	<b>RMT</b>	Ray McDonagh	<b>TSSA</b>
Wale Agunbiade	<b>RMT</b>	Abdulhai Mulla	<b>TSSA</b>

The staff side JWG team consisted of;

Jonathan Mortimer	<b>RMT</b>	Theresa Opoku-Ware	<b>RMT</b>
Beverleigh Thomas	<b>RMT</b>	Ray McDonagh	<b>TSSA</b>
Liam Nixon	<b>RMT</b>	Abdulhai Mulla	<b>TSSA</b>
Samuel Addo	<b>RMT</b>		

ARL	Arriva Rail London
BTP	British Transport Police
CSA	Customer Service Assistance
DC	Direct Current
DSE	Display Screen
ELL	East London Line
EqlA	Equality Impact Assessment
FasTIS	Flexible and Secure Ticket Issuing System (Cubic)
GLA	Greater London Authority
GPR	General Purpose Relief
IOSH	Institution of Occupational Safety and Health
ISMS	Integrated Safety Management Systems
IT	Information Technology
JWG	Joint Working Group
LENNON	Latest Earnings Network Nationally Over Night
LUL	London Underground Limited
MET	London Metropolitan Police
MFA	Management for Attendance
MIP	Mobility Impaired Person
ONS	Office of National Statistics
ORR	Office of Rail and Road
PA	Public Announcement
PPE	Personal Protective Equipment
RMT	National Union Of Rail Maritime and Transport Workers
RNI	Rate of National Increase
RPI	Revenue Protection Inspector
SME	Secondary Means of Escape
Stats	Statistics
TMIS	Train Management Information System
TSSA	Transport Staff Salaried Association
TVM	Ticket Vending Machine (Cubic)
VIP	Visually Impaired Person



**From:** Dr David A Berman (South East Rail Group) <david.berman2@southeastrail.org.uk>  
**Sent:** 06 October 2018 17:59  
**To:** Consultations  
**Subject:** Planned closure of ticket offices at 51 London Overground stations

**Importance:** High

The South East Rail Group (SERG) would like to submit the following as a 'corporate' response to the consultation and would be glad if you would incorporate this into your formal response. We also have no objection to you passing this response on 'verbatim' to ARL and TfL.

SERG has no objections to the proposal with the following provisos:

- a. That stations remain staffed from first to last train, AND that at key stations consideration is given to extra staff presence at peak/busy times
- b. That consideration is also given for staff resources at stations where accessibility is an issue, such as those where staff would frequently have to assist passengers where there are very steep stairs involved. Examples being Finchley Road & Frognal, Stoke Newington, Stamford Hill, Hackney Downs, Dalston Kingsland, Bushey, Hatch End, Kentish Town West. This is of course not an exhaustive list.
- c. SERG would wish to see the following stations Gated as part of this process, in order to offer additional reassurance to passengers and to provide addition levels of Revenue Protection: Stoke Newington, Bruce Grove, Bushey, Cambridge Heath, London Fields, Silver Street, Walthamstow Queen's Road, Harringey Green Lanes, Finchley Road & Frognal, Caledonian Road & Barnsbury, Kentish Town West, South Hampstead, Headstone Lane and Wandsworth Road. This list is arranged in what SERG considers to be Business Case order.

I would be grateful for an acknowledgement of receipt for this email.

Regards,

**David Berman**

**Dr. David A Berman**  
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*The South East Rail Group is a not for profit non-political Organisation.*

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**From:** Jane Earl <jane.earl57@gmail.com>  
**Sent:** 12 October 2018 14:22  
**To:** Consultations  
**Cc:** unmesh.desai@london.gov.uk; Denise Jones; Abdal Ullah; Emma Blint  
**Subject:** objection to remoc=val of staff ormticket office at Wapping overground station

Dear London Travelwatch

On behalf of St. Katharine's and Wapping Labour Party and users of our station, we would like to submit our comments on the proposal to remove staff from the ticket office at Wapping. We object to the proposal and urge you to retain the current arrangements.

We have spoken to a large number of people who use the station, and have run an online petition, which has been signed by over 140 people. The petition can be found by following this link: – <https://www.change.org/p/mayor-of-london-keep-wapping-station-ticket-office-staffed>. Comments left by supporters of the petition include the following

“I feel very safe at Wapping Station because it is well staffed and well cared for and you can always find a member of staff in the ticket office. Safety is particularly important for older people, younger people and children and women”

“Having a staff presence at Wapping Overground station and in the ticket office is a vital service to the local community, especially for the more elderly and those with limited mobility”

We also collected over 50 signatures for a petition in the following terms:-

**"Keep Wapping Ticket Office Staffed**

**Petition Summary:** We the undersigned are concerned residents who urge the Mayor of London to keep Wapping ticket office open for people with limited mobility, parents with children and those who value the support of staff on site".

We urge you to keep the ticket offices staffed and look forward to receiving a full report on the outcome of the consultations and the proposed course of action

Yours faithfully

## St Katharine's and Wapping Labour Party



By email: [to consultations@londontravelwatch.org.uk](mailto:to consultations@londontravelwatch.org.uk)

11 October 2018



Dear Sirs

**Consultation on Proposed Closure of London Overground Ticket Offices  
(White Hart Lane and Bruce Grove Stations)  
Comments by Tottenham Hotspur Football Club**

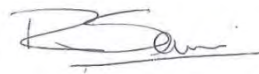
The Club has reviewed the 'Information in support of a Statutory Consultation regarding a Major Change Proposal' and wishes to make the following comments:

1. The new Tottenham Hotspur Stadium is nearing completion. The Club's old White Hart Lane Stadium, which had a final capacity of approximately 32,000 was demolished shortly after the final game against Manchester United on 14 May 2017. The Club played all of its 'home' games at Wembley Stadium during the subsequent 2017/18 season. We note in this context that the survey period for closure assessment purposes was 24 June 2017 to 23 June 2018, during which time there were no football matches or other major events at White Hart Lane.
2. White Hart Lane Station is by far the closest of the four stations serving the new stadium (the others being Northumberland Park, Seven Sisters and Tottenham Hale). Approximately 5,000 spectators typically came through White Hart Lane Station for a football matches at the old White Hart Lane Stadium. That figure is forecast to rise to nearly 13,000 with the new stadium for a typical 3.00pm Saturday kick-off.
3. The first point we must raise therefore is that the adopted survey period used to assess the closure of the White Hart Lane ticket office is not an accurate indication of either the station's historical or future throughput and correspondingly, average ticket sales. Any assessment must be based upon a more representative measure of average ticket sales, i.e. taking full account of its historic and forecast event day passenger numbers. A more representative assessment would almost certainly indicate a breach of the 12 transactions per hour threshold, which appears to have been adopted as the primary justification for the proposed closure.
4. In addition to increased ticket sales associated with event day usage of White Hart Lane Station, account should be taken of the additional leisure uses being introduced to North Tottenham by the Club that will generate significant footfall all year round. Specifically, the first phase of the 'Tottenham Experience' will open alongside the new stadium and amongst other things, will incorporate the Club's new museum and megastore. The Club has commenced the development of a 180 bed hotel and also has planning permission for an extreme sports hub and 585 homes.
5. The Club seeks confirmation that in the event of the closure of the White Hart Lane Station ticket office, event day staffing levels – particularly at gate lines and platforms – will not be impacted in any way and that the enhanced event day staffing proposed by London Overground/Arriva is maintained to ensure safe and efficient loading of the station and maximisation of the additional capacity being made available with the introduction of new rolling stock in 2019.
6. Although not promoted by the Club as an event day station, the same reassurance is sought in respect of Bruce Grove Station, which also experiences higher event day passenger numbers.
7. The Club seeks confirmation and reassurance that in the event of the closure of the White Hart Lane Station ticket office, a sufficient number of mobile ticket officers will be deployed to deal with spectator ticket sales and enquiries in order to ensure safe and efficient loading of the station.

8. The assessment in respect of White Hart Lane Station does not appear to take into account the £18m redevelopment of the station which, amongst other things, includes a new ticket hall. In addition to supporting the new Tottenham Hotspur Stadium, the redeveloped White Hart Lane Station will be the principal gateway to Haringey Council's High Road West regeneration scheme that will comprise at least 2,500 new homes together with significant leisure and employment floorspace.
9. Finally, the Club must take this opportunity to reiterate its request that London Overground/Arriva consider the introduction of male, female and accessible toilets within the new station that are accessible on both event days and non-event days.

The Club therefore **objects** to the closure of the White Hart Lane Station ticket office and would welcome the opportunity for further dialogue with London Overground/Arriva.

Yours faithfully



Richard Serra MRICS MRTPI  
**Head of Planning**

cc      Joseph Uzoka – Transport for London  
         Helen Fisher – Haringey Council

**Tottenham Hotspur  
Football & Athletic Co Ltd**  
Lilywhite House, 782 High Road,  
Tottenham, London N17 0BX

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[tottenhamhotspur.com](http://tottenhamhotspur.com)

Registered Number: 57186 England



**THE REAL LIFE  
COMPANY**



**From:** Michael Green <Michael.Green@thstofficial.com>  
**Sent:** 11 October 2018 14:49  
**To:** Consultations  
**Cc:** Michael Green; Jonathan Waite; Katrina Law; Martin Cloake  
**Subject:** Closure of White Hart Lane station ticket office

Dear London TravelWatch

I am responding to your consultation on behalf of the Tottenham Hotspur Supporters Trust ([www.thstofficial.com](http://www.thstofficial.com)) concerning Arriva's proposal to close a number of ticket offices on the London Overground and specifically the closure of the ticket office at White Hart Lane station.

As I am sure you are aware, Tottenham Hotspur will shortly be moving back to a new stadium built essentially in the same location as its old White Hart Lane stadium. Before closure the old stadium had a full capacity of 36,000 spectators; the new stadium is nearly double that at 62,000. Outside of matchdays it is likely there will be a considerably larger number of additional events (e.g. NFL games, concerts) taking place at the new stadium than there ever were at the old. White Hart Lane is the nearest train station (Overground or National Rail) to the stadium site.

Our concerns/comments are the following:

- It seems precipitous to close the WHL ticket office just as that part of Tottenham is about to welcome visitors in numbers not seen since at least the 1960s.
- Passenger usage has not been tested under previous match day conditions let alone in the changed circumstances of significantly increased capacity. The evidence presented in support of closure cannot therefore be considered reliable.
- The proposals are light on detail on replacement facilities. Before acquiescing with closure respondents will need to know the proposed number of ticket machines on hand and the number of staff proposed to be working in the ticket hall on matchdays to accommodate the substantially increased usage of the station.
- In any event, it would appear sensible to keep the ticket office open until at least the end of the current football season to test demand under matchday conditions.
- During this time staff in the ticket hall should complement a manned ticket office rather than replace it.

Regards

Michael Green  
Board Member, THST

Sent from my iPhone

## **Consultation on the closure of 51 London Overground ticket offices**

Transport for All have serious concerns regarding the closure of 51 London Overground ticket offices. We believe that closing ticket offices will have a profoundly negative impact upon of Disabled and older people's ability to access the Overground.

Given our experiences with the closure of ticket offices on the Underground a few years ago, we expect that the results of doing the same on the Overground will be very similar: more barriers for Disabled and older people, decreased feelings of confidence and safety, and more confusion for all passengers.

The barriers caused by the removal of Underground ticket offices continue to be raised at Pan London Mobility Forums. We are especially surprised about this proposal in light of comments made by Mark Wild, London Underground Director, who admitted during our Biennial General Meeting that *"when [they] closed the ticket offices [they] probably went too far"*.

Many Disabled and older people, including those with a learning difficulty; visually impaired people; Deaf and hard of hearing people; and those who are simply unfamiliar with computers find it difficult or impossible to use ticket machines – especially when making more complicated requests, such as registering a Disabled Person's Railcard to an Oyster.

Our members have told us stories of being harassed by fellow commuters for 'taking too long' when purchasing tickets via a machine during busy times. Some Disabled and older people require more time to use a machine than non-Disabled people and we are concerned that the removal of ticket offices will only create more opportunities for Disabled people to encounter harassment. The availability of a ticket office is a lifeline for those people who don't want to go through the difficulty of trying to use a machine.

It is also particularly difficult for hard of hearing passengers. Ticket offices use the loop system. Closing the ticket office takes away their only means of communication in a noisy environment.

Without the fixed point of a staffed ticket office, visually impaired people will find it harder to locate staff to assist them; especially since there is no staff point, and staff still don't wear high-vis uniforms.

Our members have expressed serious concerns about their ability to travel on the Overground at all without ticket machines. For those who have mobility or dexterity impairments it can be impossible to operate buttons and touchscreens, handle change and collect tickets on their own.

Another key issue is the limited information a ticket machine can provide in comparison to a staffed ticket office. Ticket machines do not tell Disabled people which station on each journey is the cut off for the Freedom Pass and where the Disabled Person's Railcard journey should commence from and return to. People rely on ticket office staff for this in order to avoid paying an unnecessary extra overlap in journey fare when the Freedom Pass covers only part of the journey.

Whilst we appreciate Arriva Rail London's dedication to having staff at every station, from the first train to the last, we cannot see the closure of ticket offices as anything other than a step backwards in terms of accessibility.

### **About Transport for All**

This response has been submitted on behalf of Transport for All. Transport for All (TfA) is the organisation of disabled and older people dedicated to champion the rights of disabled and older people to travel with freedom and independence in London. TfA is a membership organisation and a registered charity. For more context about TfA please [visit our website](#).

Our response has been informed by our members and trustees.



# Transport Salaried Staffs' Association

Devonshire Buildings, 16-17 Devonshire Square, London EC2M 4SQ

t 020 7387 2101  
f 020 7383 0656  
e [enquiries@tssa.org.uk](mailto:enquiries@tssa.org.uk)

London TravelWatch  
169 Union Street  
London  
SE1 0LL

12<sup>th</sup> October 2018

By email to: [consultations@londontravelwatch.org.uk](mailto:consultations@londontravelwatch.org.uk)

Dear Sir or Madam,

## **RE: ARRIVA RAIL LONDON (LONDON OVERGROUND) PROPOSAL TO CLOSE 51 TICKET OFFICES**

I am writing to you in connection with the above matter.

TSSA is recognised by Arriva Rail London (ARL) for collective bargaining purposes and has been involved with protracted industrial relations discussions in connection with the company's proposal that, of the 65 stations with ticket offices, it intends to close 51 of them. This letter is our response to the Schedule 17 consultation and from the start we want to make clear our opposition to the company's proposal.

In our view, ARL's proposal is using the Schedule 17 process as a smoke screen when the real agenda is about making savings without regard to the consequences in terms of customer service assistance to passengers or the personal security and safety of both rail users and staff.

Our opposition is based on several factors including:

- A failure to recognise the unmeasured parts of ticket office duties;
- A failure to properly assess each station and its unique facilities, location or circumstances;
- A failure to carry out risk assessments of the threats to passengers and staff consequent on the implementation of the proposals;
- A failure to consider the unique characteristics at different stations.

### **1. A failure to recognise the unmeasured parts of ticket office duties: Inadequate information in the consultation**

The company's plan is based on the number of sales per hour at its ticket offices with the proposal being to close those that sell less than 12 tickets an hour. However, what this single activity hides are the other, unmeasured, services carried out in the ticket offices

[www.tssa.org.uk](http://www.tssa.org.uk)

Members' helpdesk **0800 3282673**  
General Secretary **Manuel Cortes**



that include:

- the provision of advice to passengers about fares, routes and prices of travel;
- the offer of choice as to whether to use the ticket office or TVM (TSSA members have reported that many TVM users seek reassurance from ticket office staff that they have purchased the correct tickets);
- dealing with queries associated with the TVMs (Ticket Vending Machines) and tickets bought online;
- provision of information at times of disruption;
- playing a part in revenue protection;
- being a focal point where passengers can seek assistance with personal security.

On this basis, TSSA would ask London TravelWatch to recognize the inadequacy of ARL's chosen measure and to accept that this alone is not truly reflective of the service provided to passengers.

## **2. A failure to properly assess each station and its unique facilities, location or circumstances**

ARL has failed to properly assess the impact of their proposal at each station. We can make this claim on the basis that the company has failed to risk assess how their scheme will impact on passengers or staff. Consequently, the TSSA and RMT union staff representatives (ARL employees) have carried out a series of visits to every affected station and their combined reports are attached to the email that forwards this letter to London TravelWatch. The reports show, for instance, that:

- Crime figures in the stations provided to staff reps (but not available in the public domain through the Schedule 17 consultation document) only covers 2017 so cannot be compared with what went before or has happened to date in 2018.

Each report, however, records staff feedback in terms of crime, noting the extent of issues that take place (eg, physical and verbal assaults on staff and passengers and anti-social behavior);

- Crime figures around the stations, based on Metropolitan Police information, have not been provided by ARL. What we are aware of is that crime outside the station can find its way onto the railway and then affect passengers and staff: recently, this has included two instances of gun crime, a stabbing (on a train) and a rape (in April) plus issues of begging due austerity;
- CCTV coverage, where installed, is often from the ticket office but when not being monitored, creates blind spots at a number of stations;
- Footfall data is inaccurate meaning that an assessment of the number of passengers using each station is impossible. At many stations the absence of this information highlights problems with crowd control, exasperated when queuing systems conflict with passengers trying to get on the platform to catch their trains

(eg, at Crystal Palace and Willesden Junction). At some stations, there are no queuing systems (eg, Crystal Palace, Hackney Central, Highbury and Islington);

- Repetitive strain. At some stations that are significant numbers of platforms, entrances and exits, as well as numerous steps up long stair cases, all of which have to be navigated (eg, at Crystal Palace and Hackney Downs). Where staffing has been cut, this means that one person may have to endure this daily physical ordeal, potentially leading to repetitive strain injuries;
- Lone working. Even with the current station staffing at some stations, workers often find that they can spend long hours apart from colleagues as they perform their duties. The reports highlight current concerns about lone working and fears about personal safety when, for instance:
  - carrying out security checks
  - dealing with TVMs
  - opening and closing the station
  - at times of anti-social behavior or the presence of gangs
  - when working on or around the station, the place of refuge can be a long distance away and not immediately accessible in an emergency
  - the standard of the refuge and whether it is a secure place of safety (eg, is it a solid building with a secure door - or a temporary structure) - and even if the member of staff has a key to be able to get into it
  - access to panic buttons


This is in addition to the strain that employees feel when they are pulled in multiple directions as they carry out a variety of duties, including dealing with disruption and unhappy passengers.

It should be noted that Arriva Rail London's employee policy on lone working by employees is six years out of date and does not cater for the current circumstances with the absence of Revenue Protection Inspectors (RPI), Travel Safe Officers (TSO) or Guards on trains. The policy, therefore, is completely inadequate for the ticket office closures programme and means that staff feel unsafe in their work. This is another failing by ARL in its rush to get its proposal implemented.

- Many of the union reports attached to the accompanying email also put the station in the context of what surrounds them in terms of colleges, shopping centres and sporting venues. Some also highlight the presence of pubs and bars serving alcohol. We will develop this point further later in the response to highlight additional factors that we would ask London TravelWatch to consider in its analysis in relation to specific stations.

The reports are important - and should be taken note of - because they expose the areas that ARL has failed to assess which further undermines their focus solely on ticket sales to justify closing 51 tickets offices.

The company also appears to have failed to carry out risk assessments as they are obliged

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to under the Management of Health and Safety at Work Regulations 1999. That assessment would have picked up a number of these workplace concerns and how they have the potential to affect passengers. Risk assessments are supposed to be carried out with trade union input but ARL has not approached TSSA, one of the reasons why the attached reports were produced.

**The point to note from the above is that with ticket offices closing, at many stations there will only be one member of staff on duty at any one time, exasperating the issues described.**

To illustrate our claim and the impact it will have on passengers:

- **Personal Security:** Where only one person is on duty for much of the operational day (eg, Hackney Central, Shoreditch High Street, West Hampstead), that person will have to deal with all of the duties and issues that arise on their own without any immediate support.


Our members have already reported an increase in anti-social behavior because staff employed as RPIs, TSOs and Guards on trains are no longer present to deal with ticketless travel, a situation compounded by a lack of British Transport Police presence at stations.

Currently, the presence of a member of staff in a ticket office not only provides reassurance that in the event of trouble, a passenger can seek immediate assistance, but it also enables the person working on the platform to know that they have not been left alone to deal with very difficult situations.

When the ticket office is closed and the staff dismissed or re-deployed elsewhere, a passenger needing assistance will have to find the busy railway worker somewhere on the platform (and some stations have multiple platforms). The closure of the ticket office also means that no one is likely to be monitoring the CCTV in real time and so able to immediately call the emergency services;

- **Queuing:** The closure of the ticket offices will also result in longer queues at TVMs which, as the TSSA/RMT reports show, at some stations can conflict with passengers trying to get on the platform.

Where only one person is on duty, competing priorities means that choices have to be made about whether to deal with travel queries and problems with the TVM or to manage issues of crowd control. Whatever the employee does, there is always the potential for a fraught situation to develop as passengers frustrated with the lack of information or the inability to deal with a TVM query take second priority to crowd control issues because of the health and safety risks on a busy platform.

- **Availability of information:** In addition, passengers seeking information will no longer be able to ask at the ticket office. The withdrawal of the current service means that a dedicated information service will be lost which contradicts ARL's
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claims to be offering “an improvement on current arrangements in terms of quality of service.”<sup>i</sup>

- Deterrence to travel: anti-social behaviour acts a deterrence to travel for many passengers. London Overground has previously been able to deal with this issue by the presence of appropriate numbers of trained staff, backed up by the BTP. As noted elsewhere in this response, however, TSSA members report that the situation has got worse again following the loss of staff employed as RPIs, TSOs and train guards - and will deteriorate further as staff are removed from station ticket offices.

### 3. Arguments to retain ticket offices at specific stations

We would argue that there are specific grounds and additional factors why ticket offices at the following stations should be retained:

Brondesbury	Gospel Oak	Kensington Olympia
Camden Road	Hackney Central	Shepherds Bush
Canonbury	Hackney Downs	Shoreditch High Street
Dalston Junction	Hackney Wick	Surrey Quays
Crystal Palace	Hampstead Heath	Watford High Street
Dalston Kingsland	Homerton	West Hampstead

Reasons:

1. Security checks: During security checks the station layout leaves staff a long distance from their place of refuge (all stations above) meaning that they are more at risk;
2. Issue resolution: London Underground stations opposite the Overground stations send customers to resolve issues adding to workloads for ARL staff (eg, at Camden Road, Shepherds Bush, Shoreditch High Street, Surrey Quays and West Hampstead);
3. Disability access: Lifts at stations have seen an increase in MIPs (Mobility Impaired People) and VIPs (Visually Impaired People). This welcome installation gives an extra responsibility for ARL station staff to ensure boarding and lighting trains is carried out safely, something that needs to be prioritised when trains arrive at stations. The issue affects stations at: Brondesbury, Camden Road, Canonbury, Dalston Junction, Gospel Oak, Hackney Central, Hampstead Heath, Hackney Wick, Shepherds Bush and West Hampstead);
4. Increase in footfall: Shopping Centres close to stations have led to an increase in footfall at the station making them busier (eg, at Camden Road, Dalston Kingsland, Shepherds Bush, Surrey Quays and Watford High Street);




5. Presence of hospitals: Hospitals increase numbers in peak due to appointments (eg, Hampstead Heath (Royal Free Hospital) and Homerton (Homerton Hospital));
6. Terminating trains: Trains terminate at the station (eg, at, Camden Road, Crystal Palace, Dalston Junction, Hackney Central, Hackney Downs, Hackney Wick, Shepherds Bush);
7. Connection: A walk way connects Hackney Central and Hackney Downs Stations meaning that people can transfer between each;
8. Dealing with the trains from other companies requires a knowledge of the fares available from operators such as on GTR Southern (Crystal Palace, Kensington Olympia and Shepherds Bush);
9. Interchange stations: There are a number of stations that enable an interchange between different routes, not only making the station busier but also enhancing the need for a ticket office to be available to give advice about travel options like routes, tickets and fares (eg, Canonbury, Dalston Junction, Gospel Oak, Hackney Central, Hackney Downs);
10. Sport: The presence of football grounds close to the stations increases footfall when games are on and means that fans want advice about the cheapest and most appropriate tickets to get them home after the match. Watford FC's ground, Vicarage Road, is near Watford High Street whilst Hackney Wick is close to West Ham United's 82,000 capacity London Stadium. Surrey Quays Station serves Millwall FC's Stadium (The Den).

#### **4. Issues with Ticket Vending Machines**

ARL has installed a number of additional Cubic and Worldline TVMs in place of the ticket offices that the company wants to shut. In support of this, it has presented in its Schedule 17 consultation document details of the performance it receives from the current TVMs.

Despite these impressive results, TSSA wants to highlight the unreliability of Cubic TVMs as we are informed that they receive a certificate of competence if they can work for four 4 weeks without breaking down: to date, none has managed to on the Overground network.

We would also highlight that there have been numerous examples of the new machines not refunding cash that has been paid into top up Oyster Cards. For example, £5 is put into the machine which then doesn't apply it to the Oyster Card. In some instances, this has been down to the passenger failing to follow instructions but on others it has been an issue within the machine which ticket office staff then have to deal with through contacting the TVM operator. The machine operators refer to the problem as "hijacking" because the machine pays the cash entered to the next person topping up. The issue is still unresolved but the point is that without the ticket office staff being available, TVM problems like this would not be remedied, adding to passengers' frustration.

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TSSA would also question how the new TVMs work and whether they are a real replacement for ticket offices. In general, we are concerned that TVMs don't give travel advice (eg, on routes, appropriate ticketing types and cheapest fares) and often sell the most expensive tickets first.

Another point to make is in relation to contactless payments. When queries arise about whether someone has used their card or mobile phone to make a contactless payment, there is no way for the ticket office staff to be able to check if the transaction took place. Revenue Protection staff have a device that can check whether the card has been charged (or not). The fact that the ticket office cannot check exposes passengers to penalty fares when they get on the train or at the station without a ticket. The ability to carry out the checks should be available in the ticket offices.

ARL ticket offices are able to offer cash and card refunds to passengers at present (eg, if they purchase the wrong ticket) but one of the effects of the ticket office closures is that cash refunds will no longer be available. The withdrawal of the cash facility means that passengers who require a refund may not be able to travel until they get their money back, undoubtedly adding to their frustration, especially if they have been unable to obtain travel advice in the first place.

Instead, we believe that people should be given the option to secure the advice (and, where necessary, appropriate refund) that they need from a ticket office worker who can ensure that the passenger pays the right and cheapest fare for the most appropriate route.

## **5. Parallel cuts in public transport**

It is also worth putting ARL's proposal in context because it comes amidst a series of other negative changes to transport in London, all of which will potentially impact on passengers by reducing travel options at the same time as removing access to information about timetables, routes and fares. For instance:

- The London Mayor has recently announced a review of the Central London Bus Services with a public consultation due to close in early November. The effect of that proposal, when implemented, will see a 9% reduction in bus services and changes made to 33 routes.<sup>ii</sup> Changing bus routes and reducing services at the same time as cutting ARL ticket offices means that passengers may want to use London Overground more often but will have to endure a lack of information about fares and tickets as well as the security risk of anti-social, and even violent, behavior at stations;
- At the same time, Transport for London has entered into consultation with TSSA (as the recognised trade union) about a scheme to change the opening hours at its eight Visitor Information Centres (VICs). Proposed staff rosters will see a one hour reduction in opening times at each end of the day during the Winter (reduced from 0800-1800 to 0900-1700) whilst in the Summer, rotas have been adjusted to cut morning opening times (but four of the VICs will open for 30 minutes later). What this means is that an alternative source of face to face travel information will be

reduced just when ARL are proposing to cut the same advice outlets (ticket offices) from most of their stations.

## Conclusion

TSSA calls on London TravelWatch to recognize that the information provided by Arriva Rail London is inadequate to safely proceed with the closure of 51 of the company's ticket offices. In our response we have attempted to show that there is a lot more to consider than simply the number of tickets sold per hour. We have also sought to make it clear that there are a number of genuine safety concerns that will affect passengers and staff, worsening an already deteriorating situation. What we want to see is the provision of a rail service that passengers want and can safely use and not one where the company dresses up a cost cutting exercise as an advance in customer service.

Yours sincerely

Rob Jenks  
Policy Advisor

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<sup>i</sup> See Page 7 of Schedule 17 consultation document

<sup>ii</sup> Available at: <https://consultations.tfl.gov.uk/buses/central-london/>

10 October 2018

**Consultations  
London TravelWatch  
169 Union Street  
London  
SE1 0LL**

**Copy to:  
Deputy Mayor for Transport in London  
Andrew Dismore, AM**

Dear London TravelWatch

**Closure of London Overground Ticket Offices, including West Hampstead**

I write on behalf of West Hampstead Amenity & Transport (WHAT), West Hampstead's oldest amenity group, established over 40 years. Our members, local people and interchange passengers are very concerned about the prospective closure of our London Overground ticket office, and this letter is a formal objection to the proposal.

West Hampstead Overground station – on the latest available figures – handles around 5 million passengers per year – more than 97% of the other stations on the national rail network. It is therefore in the top 100 of the 2,600 British railway stations. Other Overground stations are even busier – for example, Shepherd's Bush has nearly 8 million, which puts it in the top 60 and several others, such as Camden Road, Dalston and Hackney are also in the top 100. If stations that are this busy cannot justify a ticket office, then that does not hold out much hope for many hundreds of other stations around the network.

This station is used by a wide variety people of different ages and capabilities who live in our very diverse area. There are young families as well as old and disabled people. Many older people have written to us to say how much they value the personal service provided by the ticket office staff, some of whom have worked at the station for many years. An important function of the station is to sell National Rail tickets to destinations elsewhere in the UK, and there are many users who lack the facilities or ability to buy train tickets electronically.

The station is used by a wide range of overseas visitors and others travelling overseas when travelling via interchanges to Gatwick and Luton airports. Local residents themselves – including many EU workers and their families – travel around the UK a great deal and use the ticket office to buy their rail tickets. Many passengers interchange between rail and tube and need help and assistance, especially as there is no ticket office at the tube station. The station is located in a prime location, with high pedestrian footfall, close to the tube station. It can therefore help fill the gap left by the closure of the tube ticket office.

As a result, the ticket office deals with many enquiries about rail journeys and fares that will not be recorded in the electronically-gathered usage data provided by Arriva. This data also fails to reflect the value of the tickets sold, especially national rail tickets. We would therefore submit that the statistics that show a usage of less than 12 transactions/hour is misleading in terms of the actual usage and value of the station.

There are many ticket types that cannot be purchased from a ticket machine, and, the closure proposal therefore represents significant detriment to passengers. They include:

- 7 day or 1 month paper travelcards (lot of purchases at WH)
- Child Oyster season tickets (not available at tube stations)-
- Railcards (5 types, incl Senior)
- Tickets sold using a Warrant
- Annual Oyster cards
- Excess fares
- Replacement tickets that have stopped working
- Refunds on unused tickets
- Duplicate tickets that have been lost
- Reservations
- Advance Tickets

Local experience (contrary to the Arriva statistics) is that the new ticket machines do break down regularly, typically with software problems. Moreover, West Hampstead currently has two different (albeit very expensive) machines, with confusingly different user interface.

Reflecting its importance, West Hampstead station is currently being rebuilt with step-free access, a project that WHAT has championed since its inception. The new station, although much more capacious, is of an open air design, and is likely to be unpopular with staff if they have to remain in a draughty location without being able to advise passengers from inside the ticket office. It would seem to be “spoiling the ship” to open the new station without proper ticket buying facilities for passengers of all abilities.

Everyone in our area has experienced what happened when our Tube station lost its ticket office. The ticket barriers remained open and unstaffed for long periods (as it was today) as staff drifted away from what had become an unattractive job. While there is a ticket office at West Hampstead Thameslink station, this is often unstaffed, and, to be frank, the staff there are less helpful. As a model of a well-run station, it would be a great pity if our brand new Overground station were to become degraded in this way.

I attach a petition to keep the ticket office open, signed by many local people.

Therefore, I would request that LTW asks TfL to consider the list of Overground ticket offices proposed for closure, and at least consider saving some of those at the more important stations.

I would just like to draw attention to one further matter which I feel LTW should raise with TfL. I think it is incumbent upon a public body such as TfL to communicate with its customers in an open and honest way, and I submit that its promotion of the ticket office closures has been misleading. The proposals are described as “Modernisation of Customer Service”:

<https://consultations.tfl.gov.uk/london-overground/ticket-offices/>



This is incorrect, as customer service is not being modernised or improved. Indeed, quite the reverse is the case, for the reasons given above. The Overground system already delivers excellent customer service (arguably among the best in the UK), and the TfL and Arriva documentation contains no proposals for improvement. The Arriva Statutory Consultation Submission document simply describes the closure proposal, and offers no additional services other than those specified in the TfL/ARL Concession Agreement. The TfL web page even fails to list the ticket offices to be closed, leaving this task to the LTW web page.

\*

Finally, I should like to thank Tim Bellinger of LTW for some very helpful guidance.

Yours sincerely

John Saynor  
Chair, West Hampstead Amenity & Transport Association (WHAT)

## **Petitions text**

### 1) Carpenders Park

#### **PETITION TO STOP THE CLOSURE OF CARPENDERS PARK STATION TICKET OFFICE**

To Transport for London

We the undersigned strongly object to the closure of the ticket office at Carpenders Park station, believing that it will make it more difficult to buy the right ticket, increase safety fears for many passengers and lead to more difficult travel for passengers with disabilities.

### 2) Honor Oak Park

#### **PETITION TO SAVE OUR TICKET OFFICE AT HONOR OAK PARK STATION**

We the undersigned are calling on London TravelWatch to abandon proposals to close the ticket office at Honor Oak Park train station. The ticket office is a welcome part of our local community and provides essential services for people who either don't have access to the internet or would prefer to do transactions face to face.

### 3) RMT

Keep ticket offices open on London Overground

To: Arriva Rail London and Transport for London

Our Ticket Offices on the London Overground must be kept open

#### **Why is this important?**

Arrival Rail London and Transport for London have recently launched a public consultation on their regressive plans to close 51 ticket offices on the London Overground Network.

[http://www.londontravelwatch.org.uk/news/view?id=715&x\[0\]=news/list](http://www.londontravelwatch.org.uk/news/view?id=715&x[0]=news/list) (Consultation closing date 11th October)

Staffed ticket offices are vital on our rail network as ticket vending machines simply do not offer the range of tickets many passengers need, often overcharging people in the process:

<https://www.thetimes.co.uk/article/ticket-machines-still-ripping-off-rail-passengers-says-watchdog-3vgjcllbf>

Passengers at unstaffed stations also face regular delays to buy tickets as there are rarely enough ticket vending machines to meet demand at peak times.

Station staff in ticket offices also regularly provide a point of human contact for passengers improving safety and enabling disabled passengers to travel with confidence.

Proposed ticket offices to be closed are: Acton Central, Anerley, Brondesbury, Brondesbury Park, Bruce Grove, Bush Hill Park, Caledonian Road & Barnsbury, Camden Road, Canonbury, Carpenders Park, Clapton, Dalston Kingsland, Dalston Junction, Finchley Road & Frognal, Gospel Oak, Hackney Central, Hackney Downs, Hackney Wick, Haggerston, Hampstead Heath, Hatch End, Headstone Lane, Homerton, Honor Oak Park, Hoxton, Imperial Wharf, Kensal Rise, Kensington (Olympia), Kentish Town West, Kilburn High Road, Penge West, Rectory Road, Rotherhithe, Shadwell, Shepherds Bush, Shoreditch High Street, Silver Street, South Acton, South Hampstead, Southbury, St James Street, Stamford Hill, Stoke Newington, Surrey Quays, Theobalds Grove, Turkey Street, Wapping, Watford High Street, West Hampstead, White Hart Lane and Wood Street.

Please sign this petition and help us keep London Overground's Ticket Offices open.

#### 4) West Hampstead Amenity and Transport

##### Stop Closure of Overground Ticket Offices in West Hampstead and Elsewhere

To: Deputy Mayor for Transport in London, Heidi Alexander / Arriva Rail London

TfL wants to close our Overground ticket offices at West Hampstead, Brondesbury and Finchley Road & Frognal and at almost every other Overground station - just like it has already closed all the Tube ticket offices. There is currently a "consultation" taking place and we urge you sign this petition and to respond to the London Travelwatch "Consultation" by 12th October:

<https://consultations.tfl.gov.uk/london-overground/ticket-offices/>  
<https://www.surveymonkey.co.uk/r/cdvzwtm>

##### **Why is this important?**

Our ticket offices provide an incredible valuable service to residents and to the many thousands of people who interchange between tube and other rail services every day. The helpful staff sell tickets for any rail journey in the UK. They provide an enquiry and Oyster top up service, to fill the gap left by the closure by Boris Johnson of our tube station ticket office. They provide help for the many visitors from abroad who travel through West Hampstead. Members of the local amenity group, West Hampstead Amenity & Transport, have told us that, if they could not easily buy mainline tickets, they would go by car instead.

When our Tube ticket closed, the busy tube station at West Hampstead was - and still is - frequently left unstaffed with the barriers open. It seems that this was caused by former ticket office staff leaving and not being replaced. This in turn encourages crime and anti-social behaviour by allowing anyone to enter the system without a ticket. The same thing could happen on the Overground, which is one of the most successful rail projects anywhere in the country.

TfL's website states that this is a "Modernisation of Customer Service", whereas in fact no improvements are specified in the documents that they have supplied, and the move will worsen the service for passengers who need help and/or those who need to use a ticket office. The proposals appear to have been based on inaccurate figures for the number of tickets sold and they fail to reflect the value of having a national rail enquiry office in local communities.

If this methodology were used on the whole national railway system, there would be hardly any railway ticket offices left across the whole country, and whole swathes of the UK would be without a retail facility for purchasing tickets.

Finally, if the ticket office at West Hampstead is closed we've been told that the ticket office in the new West Hampstead Overground station will be built! The station is under construction at the moment, and the design of the station will be changed to exclude a ticket office from the building project.

Therefore, we must fight the plans.

It will be delivered to the Deputy Mayor for Transport in London, Transport for London, London TravelWatch and Arriva Rail London