



National Union of Rail Maritime and Transport Workers



London TravelWatch
169 Union Street
London
SE1 0LL

11 March 2016

Dear Sir/ Madam

Govia Rail Station ticket offices consultation about closure and changes to opening times

Thank you for consulting on behalf of Govia about its proposals to close ticket offices or reduce their opening hours across two of its franchises (Southern and Thameslink).

This has been a chaotic and badly organised consultation with little respect shown by Govia either to yourselves or the travelling passengers. A botched attempt to start the consultation at the start of February was abandoned and then started again without any notification in an equally unsatisfactory way on the 22nd February. It will be of little surprise to find out the vast majority of passengers with whom our members had contact, both after the initial publicity surrounding the first consultation and then during this one were not aware of the proposals and had not seen any posters about the ticket office changes being proposed for example.

For example, on the 3 March when 20 members of RMT volunteered to leaflet Balham Station not one poster could be found displayed at the station and not a single passenger we spoke was aware of what was happening. Where posters are displayed it is unclear that any detriment will be experienced and the message is an overwhelmingly positive one promoting modernisation and not the loss of jobs or facilities.

When we explained the proposals and the use of customer hosts in the future, passengers were dismayed at the idea of disorderly lines of anxious passengers squabbling over who is next to speak with a roving member of staff. There was a perception of long lines of people queuing for ticket machines and that travel on the transport network is becoming more and more unsafe, managed only to extract profit at the expense of customer service.

Govia in their consultation document claim otherwise and that these changes are motivated by a desire to improve customer service. We dispute that assertion and refer to the Franchise Agreement signed with the Secretary of State in 2014 which states at 3.1 D in the section on *Staffing at Stations / Proposals to de-staff Stations*:

"(d) in deploying staff for the purposes of this paragraph 3.1, it [the company] acts as a reasonable efficient and skilled Train Operator. Accordingly the Franchisee shall ensure that staff deployed in the fulfilment of its obligations under this paragraph 3.1 are assigned to duties that mean that they are reasonably deployed on platforms, **ticket offices** and station concourses so that their availability to provide reasonable assistance and advice to passengers (as needed) is visible to passengers;"

RMT believes that an efficient and skilled operator should be ensuring that the deployment of staff via ticket offices remains the reasonable way in which to provide services to passengers. This is the case especially given the complexity of some of the interaction involved.

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There would appear to be a drive to close ticket offices from both the DfT's Franchising Department and the train operating companies, who are seeking to trim operational costs, including staff costs and the transactional costs of ticket selling. In doing so, the costs of such staffing are being seen as a high proportion of operational costs, although as a proportion of the total Railway costs (i.e. including Network Rail's total costs, and the regulatory and Departmental costs) they are not.

The Railways are there to serve a) passengers; b) freight; and c) external economic and social objectives related to moving a) and b) and the cost of operational staff providing an efficient and skilled service should not be identified as an inconvenient burden.

RMT believes that Train operating companies should not look on the reduction in costs of staffing as a potential source of profit, but instead see their jobs as a necessary element of providing an efficient service across the whole industry, and in relation to the impact on a), b) and c) above

RMT has seen no evidence as part of these proposals 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 including to security, help for the disabled, vulnerable or technically less abled.

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 the form of comments on postcards and petitions returned by passengers.

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"

Schedule 17 makes it absolutely clear that an operator can only make major changes to ticket office opening hours if: "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 wide spread and easy access to the purchase of rail products, notwithstanding the change"

In terms of the quality of service it is evident that the cuts proposed by Govia will not result in an improvement on current arrangements for the reasons we outline.

We hope that as champions representing the views of passengers, you are minded to oppose the withdrawal of the ticket office services, the maintenance of which passengers reasonably believe to be in their interests. We hope your assessment of Govia's latest proposals (made with little supporting evidence), will fully reflect the passengers' views and not be moderated to better fit with the aim of simply reducing operational costs.

There is also a very serious issue about the data that is being used to justify these proposals. On 4 February RMT representatives requested that management provide us with the figures relating

to their statement that customers are not using the booking offices and now favour TVMs and online purchase.

The data requested was for a long period, ideally at least 6 months for the takings from the booking offices, TVMs and revenue staff. We wanted to see this in a detailed form so that we could compare the usage of TVMs when booking offices were open, and also when revenue staff were helping, to be compared with the TVMs usage, by time of month, day of the week, etc.

That would enable us to see how many tickets were sold at a booking office? What types of tickets were sold? What was the value of each ticket etc.? This could then be compared to the data from TVM takings, numbers, and value of tickets. RMT understand that by comparing, for example, a ticket from Stevenage to London Terminals sold by a TVM with an advance ticket purchase from a Booking office is not the same. Only by drilling down on the real detail of the statistics would we be able to understand the logic of these proposals.

At a meeting on 4 February Govia promised to make an effort and bring us the information we requested. On the 26 February we received the Ticket Vending Machine (TVM) allocation plan, the schedule 17 consultation timescale and the National Rail Passenger Survey. However, the raw ticket data was not provided and we were simply shown pie charts that showed that the total booking offices sale from all Stations on the line has reduced from 60+% to 30+% of total sales between 2009 and 2015. RMT believes this can be challenged, as it does not tally with Transport Focus report and it is out of context; the number of passengers has increased significantly during this period and the percentage may still reflect the same numbers of passengers actually using the booking office.

We were presented with Alexandra Palace station tickets sales, TVM and booking office over a continuous 2 month period (September and October) and we pointed out that whilst the TVM is available 24 hours the booking office is not, so it is not a genuine comparison. This is also a station within the zones where the oyster card is available. The two months that were used are when a large number of young people are going back to school or universities and they will tend to use new technology more than older passengers, plus all the commuters who return from summer holidays.

While an analyst can extract and selectively interpret data and express it in graphics, the analyst's report can never reflect the reality of what happens on the station. A figure of 1 ticket sold in 10-15 minutes at a Booking Office does not reflect the fact that the person served might be an elderly customer with hearing and/or visual impairment, nor the complexity of the ticket request.

RMT has despite requesting, not received any explanation as to the method of determination as to when a station is a host station and not a hub station as part of these proposals.

We do not believe Govia's claim that upgraded ticket machines and customer hosts on platforms can perform the full range of the tasks currently carried out at ticket offices is genuine.

Specifically, the following is a non-exhaustive list of the tasks that are performed at ticket offices, but which cannot be carried out at ticket machines or on mobile hand-held devices:

- Buy railcards and annual season tickets
- 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
- Produce the photo ID cards which are essential for season tickets of a month or longer to be valid.
- 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
- 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.
- Advise 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 do not 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)

Feedback from our members is that passengers are often tentative about approaching them in the ticket hall or 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 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 passengers and undermines passengers having a positive perception of the administration of our railways.

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. Further, ticket machines are touch-screen and do not 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 Govia has not taken sufficient steps to accommodate disabled users and would not be able to adequately mitigate the proposed loss of ticket offices.

Not all ticket halls are suited to the placing of large ticket machines and TVM transactions are much more likely to be held up, causing queues and requiring staff assistance to correctly complete. Regarding the queuing problems GTR fails to note the excessive queues currently and we are unaware if they have recorded the correct information. Most passengers are not aware what the industry's guidelines are regarding queuing in peak and off-peak periods. While these guidelines are not in the National Rail Conditions of carriage, Govia has recognised it in its own passenger charter (amounting to an annex to their contract with the passengers). We request that you enquire whether Govia is monitoring the queues at station, a norm expected within 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 does occur 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 Pryce¹. 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.

Although a number of the stations which face losing their ticket offices are suburban, there are still relatively elevated levels of criminality in and around those stations. For example, within Norbury station there were 384 criminal and anti-social behaviour offences recorded as occurring in 2015/16 (up from 304 the year before)². In the same time period Balham saw an increase from 612 to 952, Denmark Hill 300 to 400, Gipsy Hill 60 to 120, and Thornton Heath 135 to 195 and Selhurst up from 56 to 84.

Furthermore, many stations which have already shed their ticket offices are showing a significantly higher level of reported criminality. For example, statistics produced by the British Transport Police for Wembley Park station (ticket office removed) show 2,544 criminal and anti-social behaviour offences reported committed in 2015/16 (up from 2,256 the year before)³. Whereas at nearby Wembley Central station (ticket office retained) there were just 14 criminal and anti-social behaviour offences reported committed in 2015/16⁴.

Obviously there are many variables underlying the occurrence and recording of crime. However, there is a wealth of international research specific to public transport showing that where the level of official control differs, certain types of crime (e.g. theft and sexual assault) are often displaced to locations where criminals feel more confident that they will not be caught. This is a plausible hypothesis in understanding crime fluctuations in Wembley, which further research would likely support.

Finally we note your recent decision in relation to the proposal by Transport for London to close ticket offices at the "ex-Silverlink" stations. We suggest that there are material differences between the services available to passengers at or around those stations as compared to those available at the stations operated by GTR. Specifically, Transport for London has invested considerable sums into upgrading the TVMs in use at its stations and continues to upgrade them. Also, Transport for London has invested considerable sums into permitting processing of payment for journeys by passengers via bank card "wave and pay".

GTR has not trialled the closure of ticket offices at a sample of stations. If it had done, it would have been able to analyse and present evidence on which we, London Travelwatch and Transport Focus could better understand the implications of their proposal. Within London a significant number of ticket purchases have, following the closure of almost all TfL ticket offices, been displaced to national rail station ticket offices. Accordingly we are concerned that the removal of all ticket offices, which GTR's proposal appears to herald, will leave passengers with a very much diminished service across the combined transport network.

¹ <http://www.kilburntimes.co.uk/news/dawn-butler-mp-brent-overground-ticket-office-closures-could-cost-lives-14374865>

² <http://crimemaps.btp.police.uk/data/?q=Norbury, London SW16, UK#about>

³ <http://crimemaps.btp.police.uk/data/?q=Wembley Park, Wembley, Wembley, Greater London HA9, UK#about>

⁴ <http://crimemaps.btp.police.uk/data/?q=Wembley, Greater London, UK#station>

We hope you will support the continuation of existing services to passengers from ticket offices at these Govia Thameslink Railways stations. We request the opportunity to meet with you to discuss our concerns and also to be able to respond to any supplementary or rebuttal arguments which GTR may wish to put.

Yours faithfully

A handwritten signature in black ink, appearing to read "Mick Cash". The signature is fluid and cursive, with the first name "Mick" being more prominent than the last name "Cash".

Mick Cash
General Secretary