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**Our Ref:**  
**Your Ref:**

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Dear Peter,

### **Cashless buses**

Thank you for consulting with us on this proposal and inviting our views.

London TravelWatch is the statutory watchdog representing transport users in London. The proposal for cashless operation of the bus network was considered at our Policy Committee meeting on the 10<sup>th</sup> September 2013.

We are concerned about this proposal. We recognise the benefits for cost and time saving, but in our view removing cash as a means of payment is not acceptable in the current environment for the following reasons:-

- The impact on vulnerable people, particularly at night times when agencies for Oyster products or top-ups may be closed, or in areas where such facilities may not exist.
- Vulnerable people may not be aware of or have confidence the arrangements that TfL have in place to allow them to travel without the need for some form of ticket or Oystercard.
- This would require unreasonable levels of discretion of drivers in relation to people who could be described as 'vulnerable'.
- The potential to put drivers in awkward or tempting situations, for example by accepting cash in exchange for travel, or for 'favours' from vulnerable users.
- Delays to journeys could be exacerbated from passengers attempting to board without the ability to pay by cash. Associated with this is a risk of increased assault and abuse of staff.
- The impact on visitors to London, especially those whose first language is not English, and who may not have access to other means of payment, or who would not wish to or be able to, take up an Oystercard particularly if their stay is of a short duration.

- In a number of areas there are very few Oyster agencies or top up facilities. We would like to see agencies established for example in Dorking, Fetcham and Merstham. In addition, replacement of ticket machines on Tramlink so that Oyster products can be added would be a major benefit, not only to Tramlink but also for users of adjacent bus and rail routes

The facility to dip into the Oyster deposit is welcome, however this would be insufficient if the person needs to take two buses to complete their journey. This is quite an important consideration for lower income groups who make longer, multi-stage journeys by bus because they consider rail fares too high or that the rail services that they need does not operate at the time they need to travel.

In some cases bus companies will still need to handle cash for their non-TfL operations and so there will be little cost saving for them from eliminating the need to handle cash. In these instances it may be worth considering retaining the ability to pay by cash, especially as these share operations coincide with those routes that have the highest number of cash transactions and smaller numbers of Oyster agencies.

The limited numbers of contactless bank cards both in circulation, and with the contactless function being used means that this method of payment is not universally available; many banks and financial institutions do not yet operate these at full functionality, or only replace cards at expiry or when requested by customers, this means that there is likely to be a much longer changeover period than allowed for by the current consultation. In some cases only debit cards will have this functionality. In addition our recent research on 'Passenger Journey Experiences' showed that users were not fully confident in the use of this technology.

On a separate issue we would like TfL to consider whether funds held on unregistered Oystercards that have been handed back to TfL could be used to give credit to passengers in greatest need, similar to the way in which most 'food banks' operate. This could be in the form of a voucher for a set amount that could be added to an Oystercard by means of inputting a code either by an agent or at a ticket vending machine. Such a scheme could be operated by 'food banks' alongside their other activities. This could be a potential means of reaching the most vulnerable groups in society for whom the change to cashless operation might have the biggest impact.

If you have any questions on this response please contact me.

Yours sincerely

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