London TravelWatch. Clarification questions and responses

Easy and widespread availability of tickets

Adequacy of retail facilities

Q. What assumptions have you made about how many / what proportion of people will move to digital if ticket offices are closed?

A. Following the installation of eTicket readers to our gatelines and UK smartphone penetration now at 89% of the UK population as of Spring 2023, we expect the trend towards digital ticketing to continue to accelerate. Without further change of the type proposed by this programme, digital and smart tickets already account for approximately 70% of journeys on the GTR network.

Our London ticket offices, existing in an area with almost 100% digital and smart ticket coverage, account for approximately 1-3% of sales depending on location. This therefore represents a base level of current need for the ticket office, either due to the need for in-person support, or products not currently available online or via TVM. We expect the latter to be rapidly narrowed further by industry level changes to make further tickets available online or via TVM.

GTR has access to a number of case studies that demonstrate how people switch to digital when ticket offices close. We would be happy to discuss this with you on request.

Q. Have you assessed who will not / cannot move to digital and the effect on them of closing the ticket office?

A. Our EIA identifies that there may be some customers who cannot move to digital. This is an important rationale for our proposed ticketing assistance hours to provide face to face support and for the availability of TVMs with support for cash transactions. For disabled customers we are also retaining our existing ATP commitment on supporting disabled people to travel if they are unable to purchase a ticket.

Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.

Q. Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?

A. We have run campaigns to shift people towards digital for a number of years and currently have a campaign marking the installation of eTicket readers at all gatelines across the network. Following the installation of eTicket readers to our gatelines and UK smartphone penetration is now at 89% of the UK

population as of Spring 2023, we expect the trend towards digital ticketing to continue to accelerate - with digital ticketing already accounting for approximately 69% of journeys on the GTR network.

We therefore expect sales to naturally decline to similar levels as at our London ticket offices - e.g. 1-3% of sales, with this representing a base level of current need for the ticket office. We expect this gap to be further narrowed by industry level changes to make further tickets available online or via TVM.

Q. What reassurance and evidence can you give that retail arrangements at each station will have sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours, especially at peak hours and at stations with a higher-than-average proportion of sales from the ticket office?

A. We have considered TVM capacity at each of our stations in drawing up these proposals. Across the network as a whole, our data tells us we have TVMs in excess of demand, modelled on one transaction per 90 seconds for an inexperienced TVM user.

Our proposal is based on both customers of the ticket office and TVMs today increasingly switching to digital methods, whether barcode, contactless, smart card or otherwise. We believe, based on available evidence, that customers are likely to switch to digital tickets rather than TVMs. This has been the experience across the industry where ticket offices have closed in the past. Our staff will be trained to walk along the queues and help customers buy digital instead. As a result, over time we expect TVM usage to either remain at similar levels to today, or as is more likely, decline.

Q. Has any assessment of the TVM capacity at each station has been carried out? This is both in terms of overall capacity and 'remaining' capacity – i.e. factoring in existing sales and Ticket on Departure collection per hour from the TVM?

A. See previous answer.

Q. What mitigations do you intend to put in place to help staff 'queue bust' at busy times (including at stations which won't have staff with access to devices to sell tickets directly)?

A. Staff training will feature approaching customers in a TVM queue and advising customers where alternative products such as Contactless or eTickets may be faster and more appropriate for the journey they wish to make. We have a supply of handheld devices that can used where needed. These do not form part of our proposals, but will be used, especially during initial implementation, to support with queue busting as customers become used to the change.

Q. What KPIs will be in place at stations to monitor and report the adequacy of retail arrangements at stations (including to passengers)?

A. As today, GTR will evaluate its retail proposition through internal review such as our SQR system and customer insight channels, as well as external survey work. As evidenced by our continued investment in eTicket infrastructure, it is in the railway's commercial interests to make retail as frictionless as possible and we will monitor introduction carefully, such as wait times for TVMs. Where mobile ticketing devices are available, these can be used

Q. What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?

A. There is no impact. All retail channels are already set up to offer the best value National Rail through fare based on the information provided by the customer.

Usability, functionality and accessibility of TVMs

Q. Which products are not available from your TVMs? This should include not only tickets but also things like reservations, concessions and discounts, tickets for travel that do not involve the 'host' station, use of vouchers and warrants, and tickets for connecting services (e.g. Plus Bus tickets).

A. Detail on GTR product availability via TVM including reference to planned industry schemes is as follows at the time of writing.

Ticket description	Current status at TVM	Change expected	Detail
Advance fares	No	Yes	Industry-wide TVM scheme for introduction
Season tickets (longer than weekly)	Yes via smartcard as of now. Expansion to eTicket imminent.	No	Magstripe vending via TVM not currently supported due to risk of receipt loss by customer and need to associate with unique customer I.D which is currently provided by photocard number to enable customer service such as refunds. Smartcards are supported at all TVMs alongside eTicket options.
Railcard Sales (National and regional)	No	Potential – subject to wider industry discussions	Currently available online, with 75% now sold online. Larger stations available.
Car park tickets	N/A	N/A	Main car parks are ANPR – telephone available as alternative to online.
Refunds	No	Potential – subject to wider industry discussions	Online / customer relations refund process supports tickets not purchased online
National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)	No	Yes	Industry-wide scheme for introduction
Boundary Zone add-ons	Yes	N/A	

Staff travel discount	No	No	Available online
Buying tickets in advance rather than on the day of travel	Yes	N/A	
Tickets for travel that do not involve the 'host' station	Yes	N/A	
Seat reservations	No	Potential – subject to wider discussions	GTR does not use seat reservations
Changing a booking/tickets	No	No	Available online or via larger station
Use of rail vouchers	No	Potential – subject to wider discussions	Industry-wide scheme for introduction
Use of rail warrants	No	Potential – subject to wider discussions	Industry-wide scheme for introduction
Ranger and Rover tickets	No	No	
Plus Bus tickets	No	Potential – subject to wider industry discussions	
Ferry connections	No	No	
Group save	Yes	N/A	
Off-peak purchases before the off-peak begins (i.e. before 09.30)	Yes	N/A	
Cycle reservations	No	Potential – subject to wider industry discussions	GTR does not use cycle reservations
Photocards for season tickets	No	Yes	Industry-wide scheme
Scholar tickets	No	No	
Sleeper bookings	No	No	
CIV tickets for connections with Eurostar international services	No	No	
Child flat fares	Pre-purchased collection only	Potential – subject to wider discussions	Currently available for collection at TVM when bought online in combination with an adult fare.
GTR specific local schemes • Bedfordshire & Hertfordshire Council Council Concessionary Scheme • Easit discount	No	TBC	Alternatives to be discussed with scheme owners including moving schemes online where they are not already in place.

• Gatwick staff discount • Luton Airport staff discount • East London NHS Foundation • Luton Borough Council • Unizone • Cambridgeshire Student Connect			

Q. How will passengers access products and services not available at the station in future?

A. Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.

Q. Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?

A. Yes. The industry is working on introducing new TVM functionality such as Advance Fares, which subject to funding and supplier timescales are expected for introduction from mid to late 2024.

Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.

Q. Will staff be able to access a ticket machine, or be issued with handheld machines to sell tickets not available from the TVM? If so, what reassurance can you offer that you will retain this option?

A. Where mobile ticketing devices are available, these can be used, although they are not standard issue. However, all stations will retain fixed TOMTIS ticket office retail machines at point of implementation.

Q. How will passengers access these products and services in future?

A. See earlier answer.

Q. How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets

A. There are no changes proposed as a direct result of this programme, although there are examples where simplification is a mitigation to the issues raised in the consultation for example withdrawing photocard requirements. Fare simplification remains Government policy under the William-Shapps Plan for Rail but is not within the remit of these proposals.

Q. How will disabled people who cannot use a TVM purchase a ticket?

A. Many disabled people can use TVMs which are designed to comply with the DfT's strict code of practice for accessibility, which includes height requirements for wheelchair access and we work with our suppliers to ensure TVMs are as accessible as reasonably possible. We recognise, however, that for some people it is more difficult, depending on the individual's disability. For those who are unable to use TVMs or ticket offices today, people will still have the option of using online / mobile due to the greater compatibility with accessibility software.

For those who cannot use any of the methods above, we'll still have staff on hand to offer ticketing assistance using our machines with a broader range of training than today. We also have an existing Accessible Travel Policy where disabled people who are unable to purchase a ticket can buy one onboard or at their destination. This policy will be updated and maintained once final proposals have been confirmed.

If a disabled passenger would be best supported by their ticket being issued through a ticket office retail (TOMTIS) machine then that will remain possible.

Q. How will people summon a member of staff if they need help while using a TVM (i.e. the equivalent of the 'red light' at a supermarket self-checkout till)?

A. As today staff are expected to be in close proximity to TVMs and to approach customers who may be having difficulties, and it will be part of their training to proactively look for customers requiring support.

Q. Is it proposed to upgrade TVMs to offer remote access/video help facilities?

A. This is not planned.

Q. Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability in different weather conditions?

A. TVMs are located either as part of the ticket hall (if open 24/7) or where the ticket hall is not open 24/7 at a nearby accessible location in immediate proximity. We are however open to consultation feedback which suggests that the location or orientation of a TVM can be altered.

Q. Have you made any specific assessment of the ability of TVMs to cope with the increase in cash, especially at stations where there is a higher-than-average use of cash to purchase tickets?

A. For UK payments as a whole, cash has declined from 62% of transactions in 2006 to 14% as of 2022 and is expected to decline to 8% within the next nine years according to UK Finance. Reflecting the relatively high transaction value of rail tickets, cash does not account for a significant volume. As a result, GTR's existing TVMs have sufficient cash handling capacity for the expected volumes.

Subject to consultation with our trade unions, the multi-skilled role will incorporate training on TVM maintenance including responding to a fault with the cash equipment such as a jam.

Q. Are the TVMs which accept cash in an accessible location? e.g. can they be reached from all platforms, and if TVMs are in multiple locations is it clear where cash ones are?

A. A TVM that accepts cash is always either part of the ticket hall that contains the existing ticket office, or in very close proximity in an accessible location. No change is therefore proposed on today.

Q. If a person cannot pay by cash at the station what arrangements will exist to enable them to travel? Will there be clear signage at the station to inform passengers about this?

A. It is the same as today. All proposal stations except Essex Road and Brookmans Park have at least one TVM that takes cash and if that isn't working then there are processes in place as per the National Rail Conditions of Travel, section 6.1 that allow our customers to travel and pay at the earliest opportunity.

Q. What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs? Please answer in relation to replenishing consumables i.e. ticket stock and ink, and repairs to faults.

A. The TVM contract is structured against average TVM availability across the station estate over a rolling 13 period (4-week) time frame and has been reviewed given the proposals. Under the contract, we expect an average engineer response and resolution within 24 hours of a reported fault. Importantly however, some of the more common faults that can result in a TVM not accepting cash (e.g. a jam) or a screen calibration issue can be addressed by our station colleagues through what we call "fingertip maintenance" – in effect, similar to the fault clearing processes many large office printers will get users to complete. While there will clearly be some variation between stations, as a general principle – the proposed multi-skilled role is intended to increase the proportion of, and in many cases the hours of availability of staff with the skills and training to keep TVMs in service relative to today. Consumables will remain a station staff responsibility.

Q. Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?

A. We would be happy to consider this either temporarily during implementation or, if it can be deemed as adding value, for longer. Given that this proposal involves customer behaviour change, introducing set standards would be inappropriate before a reasonable period has elapsed, although the existing standard of five minutes for ticket offices at peak times is potentially a reasonable starting point once changes have bedded in.

Providing assistance to travel in a timely and reliable manner

Q. Are staffing levels sufficient to ensure assistance with ticket purchases can still be offered at busier times alongside other duties? Do you have any evidence / assessments to support this?

A. Existing ticket office usage as a proportion of overall sales has been a lead consideration in planning staffing levels and is informed by passenger demand analysis.

As evidenced by the experience of our London stations, the proportion of transactions that require assistance is in practice very slight. Each station will undergo a risk assessment to determine that the right level of staffing is available to safely undertake their duties and meet the needs of customers.

Q. What training will multi-functional staff have in ticketing/product range to ensure they can provide expert assistance necessary to navigate the complex fares system and ensure passengers get the right ticket?

A. Our ticketing office staff have a vast knowledge and we want to ensure that as well as creating a more varied and interesting role, we continue to support our customers with high quality advice.

As a result, subject to consultation with trade unions, this would be further developed if and when proposals are taken forwards. Appropriate training would be provided to ensure staff are able to advise customers where required on the most cost effective option for their journey.

Q. How will people find a staff member at the station if they are no longer in the ticket office. will there be a central point / method for calling them? What will the queuing arrangements be when multiple passengers want help/advice?

A. Following consultation input, at stations where it is possible that a member of staff may not be immediately available, for example due to the layout of the station or if single staffed then we are committing to enhancing our accessibility meeting points with a method of notifying a member of staff that a customer is on the premises and awaiting assistance. This is being developed in coordination with RDG, recognising the importance of a consistent approach between different operators.

We believe that staffing levels are sufficient not to need queuing arrangements, based on customer demand and travel patterns. Our staff are trained to assist people in the appropriate order depending on their need. Each station will undergo a risk assessment to determine that the right level of staffing is available to safely undertake their duties and meet the needs of customers.

Q. When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?

A. Accessibility has been a primary focus when making these proposals as is maintaining the ability to turn up and go. There is no proposed reduction of station staffing hours within the London TravelWatch area.

Q. If this is reliant on onboard staff how will passengers be assisted to move around the station to the platform / to purchase the correct ticket / get advice / journey plan? How will passengers alert the guard if they haven't pre-booked assistance?

A. As today, support at stations is not proposed to be available outside of staffed hours or via the support of a Mobile Assistance Team. For boarding assistance, as today an On Board Supervisor / Conductor will step off the train at each station to identify customers on the platform requiring assistance and where a boarding ramp may be helpful - examples include a wheelchair user, a visually-impaired person, parents with buggies or elderly people.

Q. If the mitigation is a mobile team how long will people have to wait? If you currently use mobile teams to provide assistance do you have any evidence on their effectiveness (e.g. time taken to arrive, passenger satisfaction)

A. Within the London TravelWatch area, there is no proposal to change the use of or introduce new Mobile Assistance Teams.

Q. If the mitigation is to provide an accessible taxi what processes will be put in place and what is your assessment of the adequacy of this compared with travel by train?

A. Taxis do not form part of our proposals.

As today, wherever possible, we aim to ensure that customers can travel by train for as much of the journey as practicable. In some cases (such as a disabled customer with reduced mobility being unable to travel due to the station being inaccessible) we may provide a free taxi (accessible, if required) between the inaccessible station and the nearest or most convenient accessible station as a reasonable adjustment.

Q. What monitoring regimes will be put in place to measure time taken and reliability?

A. As today, any failed assistance will be investigated thoroughly by our accessibility team. Following the model used by our safety team, the objective of the process, led by a senior GTR manager is to identify the root cause and introduce measures to reduce the risk of it happening again.

Q. How will people summon help if staff are not there?

A. As today, for those stations that are unstaffed, this will be via station help point, freephone or text message to our central accessibility team.

Q. Do all stations have tactile paving fitted – the need for this is increased if the station is to have no or less staff in future?

A. Almost all stations served by GTR have tactile paving. In the London TravelWatch area, just two remain to be fitted out at the time of writing. Outstanding stations are: Watton-at-Stone (completion expected late October 2023) and Hertford North (in Network Rail planning process).

Q. Are staffing levels sufficient to ensure assistance can still be offered at busier times alongside other duties? Do you have any evidence or analysis that addresses this?

A. We would continue to provide assistance in line with our Accessible Travel Policy commitments. As today, station staffing levels are based on assisted travel volumes and staff will continue to be trained to prioritise assisted travel above wider customer service. It is also important to note that at the majority of locations, while ticket office staff may provide the initial welcome for assisted travel and any retail involved, it is the gateline, platform or on-board teams who provide boarding support. Therefore, in the round, this proposal will increase the proportion of staff involved in supporting accessibility.

Q. What training will multi-functional staff have in ticketing/product range to ensure they can provide expert assistance necessary to navigate the complex fares system and ensure passengers get the right ticket?

A. Answered above.

Q. How will people find a staff member at the station if they are no longer in the ticket office. will there be a central point to replicate the ticket office/window and method for calling them?

A. Following consultation input, at stations where it is possible that a member of staff may not be immediately available, for example due to the layout of the station or if single staffed then we are committing to enhancing our accessibility meeting points with a method of notifying a member of staff that a customer is on the premises and awaiting assistance.

Q. What will the queuing arrangements be when multiple passengers want help/advice?

A. As today, as with gateline or platform staff, customers will self-queue. As a general principle, these proposals are intended to increase the proportion of staff that are more readily accessible to customers especially at larger and medium size stations. For retail purposes larger stations already have structured queuing systems in place, as is already the case as for example at London Victoria, but realistically systems such as these are unnecessary for the majority of locations.

We believe that staffing levels are sufficient not to need queuing arrangements, based on customer demand and travel patterns. Our staff are trained to assist people in the appropriate order depending on their need. Each station will undergo a risk assessment to determine that the right level of staffing is available to safely undertake their duties and meet the needs of customers.

Q. What assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?

A. We would continue to provide assistance in line with our Accessible Travel Policy commitments. As today, station staffing levels are based on assisted travel volumes and staff will continue to be trained to prioritise assisted travel above wider customer service. It is also important to note that at the majority of locations, while ticket office staff may provide the initial welcome for assisted travel and any retail involved, it is the gateline, platform or on-board teams who provide boarding support. Therefore, in the round, this proposal will increase the proportion of staff involved in supporting accessibility.

Q. How will staff at the station know if passengers need help to board?

A. As today, by being proactive in identifying customers who may require additional support and asking them, by being approached, or by facilitating an existing request for booked assistance.

Q. Are help points at every station and are they in an accessible location? Are there any plans to position help points in concourse areas near ticket offices to avoid having to walk along platforms or over bridges to summon help?

A. The potential closure of ticket offices will have no impact on access to help points and station staff will still be available to assist under these proposals in all cases. All in-scope stations within the London TravelWatch area have help points.

Q. What are your existing processes and SLAs for monitoring that help points are working, how quickly calls are answered and the response time to faults? What future commitments can you give?

A. As today, help points are tested as part of our SQR process. Calls that are not answered within 30 seconds are a failure, with GTR required to resolve the issue within seven days. If a help point is faulty, GTR has, under its service quality regime, 14 days to correct any issue.

Q. How will you monitor/report time taken to answer help point calls / proportion not answered?

A. Help point calls for either information or emergency are to be answered within 30 seconds. Planned general audits are carried out by our station managers, with staff also conducting spot checks at a minimum of a daily frequency as part of wider station security checks.

Each help point is also tested as part of GTR's service quality regime with two primary SLAs - the first relates to the 30 second response time, for which GTR has seven days to correct any issue. The second relates to defective help points, for which GTR has 14 days to correct any issue.

Q. Will induction loop facilities be provided elsewhere on the station/concourse?

A. Induction loops are incorporated into the design of help points. We are evaluating the need for induction loops elsewhere in the station, noting that the existing ticket office induction loop is primarily a mitigation for the sound blocking effect of the security glass.

As described above, we are also proposing the incorporation of an induction loop into the enhancement of the accessibility meeting point.

Q. What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?

A. Answered previously.

Q. How will other information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information and bus timetables etc?

A. No change planned on today as this information is displayed outside of the ticket office - e.g. a leaflet rack, poster of local travel information. In the future, should ticket office spaces have a different use, these locations may change to an alternative prominent area of the station.

Q. How will staff be able to give people journey itineraries and other printed info?

A. All GTR staff have a company issued mobile phone which is used to provide customers with advice and support and where appropriate, staff will coach customers on how to use their own mobile phones to access information online. We are not proposing printing facilities for routine use, with pens and paper for bespoke, or pre-printed leaflets / forms as today for routine information representing a faster to use alternative. Also, the TOMTIS ticket office retail machines have the ability to print.

Preventing unfair penalty fares

Q. What changes to ticketless travel rules will be made / where will these be written down to give people who can't buy a ticket some assurances that they won't be penalised?

A. There are no proposed changes - none of the potential scenarios that could be encountered under this proposal are different to what might be experienced today at either an unstaffed station, or a station where the ticket office is closed and the National Rail Conditions of Travel are already designed with these scenarios in mind.

Q. What processes will be in place so that passengers do not have to publicly declare/evidence their disability to buy on the train without penalty?

A. As today, our staff are trained and expected to act discretely, but it is reasonable to expect a customer to explain why they were unable to purchase a ticket.

Q. How will you review signage to avoid sending inconsistent messages about revenue protection?

A. As today, signage is the responsibility of our station management teams and industry-level materials are updated using established processes, for example as demonstrated by the recent change to penalty fares. As part of any future implementation, notices and signage will be updated and / or replaced to reflect new arrangements.

Q. What should passengers do if they cannot find the ticket they need on a TVM and no staff are available to help? How long is a passenger expected to try and find a staff member to help them? What evidence does the passenger then need to ensure any revenue protection action against them can be withdrawn?

A. As today at locations where the ticket office is either closed or there is not one available, a customer should purchase the closest available appropriate ticket and seek further assistance either at a station with larger facilities or via customer services where the original ticket will be refunded or excessed as appropriate. As in cases where a TVM is temporarily unavailable, our revenue staff are trained to use discretion with customers who have clearly sought to pay.

Availability of station facilities

Q. Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn? And if so, when will any proposed mitigations be implemented?

A. There will be no change to the availability of facilities as a result of these proposals. If staff hours do change, we will make alternative arrangements to open or close facilities to the same operating hours as today.

Q. If facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?

A. This is an issue that we manage today, for example through the use of CCTV. We will maintain maintenance and facility checking as today and our current cleaning regimes will remain in place.

CCTV, BTP and Rail Enforcement Officer support on request is place. As today, GTR has experience in managing anti-social behaviour at unstaffed and partially-staffed locations. We already have Travel Safe Officer teams working across our network and work closely with BTP on intelligence-led policing and patrols. We recently strengthened our partnership with the BTP for another year by signing a collaboration agreement, committing both organisations to work together towards shared objectives.

Safety and security

Q. Have you liaised with the British Transport Police about the impact on staff and passenger security? Are any mitigations planned?

A. We have a close working relationship with BTP and work with them as partners on a daily basis. While we do not envisage these proposals will impact on security, we will be working closely with the BTP if proposals are taken forwards including a risk assessment and safety validation process.

Q. Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?

A. As today, station CCTV is designed to help ensure the station is safe and secure, including at times when it may already be unstaffed. A specialist team manages and monitors live CCTV at Control.

Other issues

Future changes
Q. What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?

A: No station that is staffed today will be unstaffed under our proposals and our proposals are designed around the needs of our customers today.

The existing set-up of the Ticketing and Settlement Agreement reflects the railway as of 1995 and provided protection for customer's ability to purchase tickets, in the context of the Ticket Office being overwhelmingly the main sales channel three decades ago. Subsequently, with ticket office sales now accounting for roughly 9.5% of sales and following the example of London, expected to decline further as digital ticketing expands, the focus on in-person retail is no longer as relevant.

That notwithstanding, station staffing plays an important role in safety, security, accessibility, revenue and customer service, many of which are themselves either regulated, legal or commercial requirements or

priorities. While we should be expected to continue to evolve to suit changes in customer behaviour, society and technology, it is unrealistic to expect those priorities to change dramatically in the near future.

The intention in the future is not to replicate the historical regulation of ticket office hours, but instead focus on the output of those hours: protection of support for customers, especially disabled customers.

As a result, there is an existing link as highlighted through consultation responses in supporting accessible travel. A potential mechanism to achieve this in the future is via our Accessible Travel Policy (ATP) and those of other TOCs.

Unlike the TSA, the ATP is formally enforceable and regulated via the ORR as part of our operating licence and already commits GTR to providing assistance in a range of scenarios such as when train services have on board staff and when they do not.

Changes to an operator's ATP are controlled, with alongside the ORR's determination, operators required to demonstrate engagement with local stakeholders:

"At the time of submission, operators must confirm that they have sought and considered feedback from local groups such as their passenger panel, accessibility forum and local user groups, as appropriate."

The ORR also stipulates broader consultation requirements including consultation of Transport Focus and London TravelWatch.

Q. Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?

A: Answered previously.

Q: How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?

A: As today, through updates to the station welcome poster and online information that is available on National Rail Enquiries and across all our websites.

Q: How will compliance with any agreed new hours be monitored and reported?

A: There will be no change to current arrangements, with hours of staff availability advertised externally. We will continue to use a roster system that meets these agreed hours as today.

Q: What arrangements have been made to provide staff cover for things like sickness and holiday?

A: As today and across all GTR roles, the staff establishment size is designed to allow for sickness, holiday leave and similar. A significant attraction of the new role is greater flexibility through multi-skilling which will increase our ability to move staff to cover temporary gaps in coverage.

Timing of mitigations

Q. What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?

A: Depending on the issue in question, there may be two stages of mitigation, but these will always follow a "Day One" mitigation.

For all retail issues, the "Day One" mitigation of facilities available at larger stations will be in place, supplemented by a TOMTIS ticket office retail machine at all locations. The intention is this is developed over time, for example - progressively more types of tickets becoming available online or by TVM through wider industry programmes. The intention is for the "Day 1" mitigations to act as a full mitigant to any specific issue, and therefore it is not seen as necessary to wait until a longer-term solution is in place before the ticket office closes but would also allow for wider station changes and arrangements that will assist with modernisation and efficiencies.

Q. Is there any reason that London TravelWatch should not object to the change until the mitigations have implemented and can be demonstrated to be adequate?

A: There is no reason London TravelWatch should object to any of these proposals as prior to a longer-term solution being implemented, there will be an appropriate "Day 1" mitigation in place which will fully mitigate any issues.

These short-term mitigations will allow for passengers to buy their tickets in a different way than they do today, either at their origin station, along their route or at their destination, in line with our pledge that passengers will never have to travel out of their way to buy tickets

Q. Has any necessary funding / agreement been secured to implement any mitigations?

A: The Rail Delivery Group has agreed in principle with the Department for Transport that funding support for the Retail Enhancements will be available. GTR has agreed with its DfT leads funding for GTR-level mitigations. In both cases the release of this funding will be subject to the conclusion of the consultation process and the proposals going ahead.

There are three key areas of mitigation that DfT has agreed to fund:

1. Retail enhancements, allowing tickets sold in the ticket office to be bought either on a TVM or online. Furthermore, GTR will be funded to retain a TOMTIS ticket office retail machine at every station that currently has a ticket office

2. At 15 stations (Arundel, Bexhill, Billingshurst, Carshalton, Cheam, Cooden Beach, Coulsdon Town, Emsworth, Ford, Ham Street, London Road, Moulsecoomb, Pulborough, Rye and Warblington), DfT has supported keeping the existing hours of retailing assistance exactly the same as they are today

3. DfT will principally fund the development nationally of an enhanced accessibility meeting point

Liaison with other operators and Network Rail

Q. What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?

A: Engagement with other operators has been completed as part of the Ticketing and Settlement Agreement. Operators are in agreement.

Q: Have you engaged with Network Rail about the impact where the changes are proposed at St Pancras International and Victoria? Are any mitigations planned?

A: Yes. Proposals at locations with Network Rail staff such as London Victoria have been designed with this in mind and no specific mitigations related to Network Rail are required.

Cost benefits

Q. Do you have any forecast of the impact on revenue i.e. on how many people will no longer travel or will travel without paying as a result?

A: We do not anticipate a decline in revenue, with the 9.5% of sales via our ticket offices expected to switch to other channels. From a revenue perspective, the proposal will release staff members able to be more visible at gatelines and by TVMs, and thereby acting as a deterrent, while it is also noted that the current demographic of people which use ticket offices are less likely to fare evade. It's worth noting many UK stations do not have ticket offices and the majority are not open full time, typically oriented towards commuting as it stood in 1995.

GTR has access to a number of case studies that demonstrate how people switch to other channels when ticket offices close. We would be happy to discuss this with you on request.

Evaluation

Q. What, if any, plans do you have to monitor and evaluate these changes should the proposals go ahead? What KPIs would you be using as part of this?

A: As today, GTR will evaluate its retail proposition through internal review such as our SQR system and customer insight channels, as well as external survey work. As evidenced by our continued investment in eTicket infrastructure, it is in the railway's commercial interests to make retail as frictionless as possible.