

# Equality Impact Assessment (EIA) – London Euston

Station Reform – London Euston Ticket Office

Note: this is a live document and may change if further information becomes available or as a result of ongoing consultation.

---

## 1. Introduction

<b>Name of project and brief description</b>	<p>Station Reform – a public consultation on the potential closure of station ticket offices.</p> <p>The proposal for London Euston is that employees with specialist ticketing knowledge move out from behind the ticket office counter to what is now the ticket office entrance lobby or 'Ticket Vending Machine (TVM) area' of the station, where they will greet customers, provide ticket advice, share information and support customers to purchase tickets.</p> <p>For the avoidance of doubt, this proposal has no impact on the availability of booked and unbooked Passenger Assistance.</p>
<b>Objective of project</b>	<p>A public consultation on proposed changes at London Euston has now closed and London TravelWatch are considering the feedback, as part of industry reforms. The proposal could see the closure of counter service at the station. Staff will move out to around the station, primarily being located by TVMs which at Euston are in the booking hall area just inside the entrance to the station and very close to where the current ticket office counters are located.</p>



---

	<p>As part of the reforms, station employees will continue to provide advice about the best and cheapest fares, as well as support customers with accessibility needs. All ticket types will be available during the hours that specialist ticketing support is available.</p> <p>Proposed change to London Euston ticket retailing:</p> <p><b>Prior to change, Ticket Office opening hours:</b> Monday to Friday - 06:00 – 00:00 Saturday - 06:00 – 23:00 Sunday - 07:00 – 00:00</p> <p><b>Proposed specialist ticketing support hours</b> Monday to Friday- 06:00 – 22:00 Saturday - 06:00 – 22:00 Sunday - 07:00 – 22:00</p> <p>During the hours of specialist ticketing support a Customer Ambassador will be available in the TVM area to greet customers, provide ticket advice, as well as support customers with accessibility needs.</p> <p>Outside of specialist ticketing support hours the station will continue to be staffed from first train to last train.</p> <p>Avanti West Coast (AWC) aims for our plans to be inclusive and meet the needs of all customers. We have engaged with disabled groups throughout the consultation, through our accessibility panels, both national and regional.</p>
--	---

This feedback has shaped this document, which may continue to be refined as we identify risks, opportunities, and mitigations throughout the next project stages.

## 2. Impacts on customers with Protected Characteristics

Impacts have been recorded below. As the project progresses, more impacts may be identified which will be added to the tables below. Impacts and mitigations may also change in detail as more information is discovered. Progress of these mitigations will be monitored through project reviews throughout the process.

Characteristic	Impacts	Mitigation
<b>Disability</b>	Euston ticket office is a known space for passengers to find staff and receive assistance, not just for purchasing tickets. This could result in passengers not receiving the support they need leading to them no longer choosing to travel by rail.	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based at the entrance to the station, near the Ticket Vending Machines (TVMs), to greet customers, provide ticket advice, share information, and support customers with accessibility needs</li> <li>• The Assisted Travel Lounge will continue to be the focus for passenger assistance at London Euston and will continue to be available to support disabled customers</li> <li>• Proactive AWC, Network Rail and other TOC staff will remain around the station and able to support customers from first train to last train</li> </ul>



	<p>Some customers do not use mobile devices and may not be able to use or comfortable using TVMs.</p>	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based at the entrance to the station, near the Ticket Vending Machines (TVMs), to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>• The Customer Ambassador will have access to a portable machine to sell tickets if the ticket is not available on TVMs.</li> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> </ul>
	<p>Euston ticket office has hearing loops installed at counters.</p>	<ul style="list-style-type: none"> <li>• Staff will continue to use an induction loop to communicate with customers.</li> <li>• Customers may request to be taken to a quieter area of the station, and the Customer Ambassador will be able to move with the customer and sell tickets.</li> <li>• Hearing loops are available in Assisted Travel Lounge and First-Class Lounge</li> </ul>
	<p>This project may lead more customers to use the TVMs. TVMs may not be accessible for some disabled customers, including those with visual impairments.</p>	<ul style="list-style-type: none"> <li>• The current TVM operating system includes best practice colour contrasting, font size etc. As a result, some visually impaired customers will still be able to use the TVMs.</li> <li>• Staff will be available in the TVM area (as well as elsewhere in the station) to support customers.</li> </ul>

		<ul style="list-style-type: none"> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> <li>• The Customer Ambassador will have access to a portable machine to sell tickets if the ticket is not available on TVMs.</li> <li>• Tickets will be available to purchase via the AWC website or app and also through a telephone call to the AWC Contact Centre</li> <li>• The AWC website is built to WCAG 2.1 AA standard; including screen readers functionality, appropriate colour contrasting and alt-text.</li> </ul>
	<p>The physical design of TVMs makes it difficult for wheelchair users to get close to machine.</p>	<ul style="list-style-type: none"> <li>• The current design of the TVMs includes action buttons located at the bottom of the screen so wheelchair users are able to use the TVM to purchase tickets.</li> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based at the entrance to the station, near the TVMs, to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> <li>• Tickets can be bought via the AWC website or app and also through a telephone call to the AWC Contact Centre.</li> </ul>

	<p>Customers (including autistic customers) are confident in their routine which could mean purchasing from the same people/windows in ticket offices.</p>	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based at the entrance to the station, near the TVMs, to greet customers, provide ticket advice, share information, and support customers with accessibility needs. This is next to the existing ticket office counters so customers will not be required to change their journey through the station to access this ticketing support.</li> </ul>
	<p>Guide dogs are trained to go to the ticket office or find other static points within stations.</p>	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based at the entrance to the station, near the TVMs, to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>• Targeted communications to specific disability groups will support new processes.</li> <li>• The meeting point for Passenger Assistance will remain the Assisted Travel Lounge at London Euston</li> </ul>
	<p>Some disabled people may be more likely to use cash instead of cards as this is seen as easier than card payments.</p>	<ul style="list-style-type: none"> <li>• There are cash TVMs in operation at Euston by Avanti and London Northwestern Railway</li> <li>• The Customer Ambassador will have access to a portable machine to sell tickets which cannot be purchased on TVM for cash</li> </ul>
	<p>Railcards aren't available at the station.</p>	<ul style="list-style-type: none"> <li>• Disabled Persons Railcard already has to be applied through post or online to prove eligibility</li> <li>• Railcards available online</li> </ul>



	<p>Changes will need to be made to our Accessible Travel Policy.</p>	<ul style="list-style-type: none"> <li>• Changes to be made in collaboration with the Office of Rail and Road (ORR)</li> <li>• Commitments to Passenger Assist, the two-hour booking window and a Turn-Up and Go service will be met. This service is provided by Network Rail at London Euston.</li> </ul>
	<p>The TVM area at London Euston is busy making it difficult for some disabled customers, especially for powerchair and wheelchair users</p>	<ul style="list-style-type: none"> <li>• Queuing system to be implemented with a singular queue to avoid confusion, alternatively the Customer Ambassador can prioritise customer needs with a triage type approach.</li> <li>• Proactive staff will support customers in the queue and around the station.</li> </ul>
	<p>The busy London Euston concourse could be disorientating to customers</p>	<ul style="list-style-type: none"> <li>• Staff presence from Network Rail and different operators around the station</li> <li>• Staff primarily based as points such as the Assisted Travel Lounge, podiums and by the TVMs</li> </ul>
	<p>Disabled customers may not be able to find staff around a busy station</p>	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based at the entrance to the station, near the TVMs, to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>• Large staff presence from different operators around the station</li> <li>• Staff primarily based as points such as the Assisted Travel Lounge, podiums and by the TVMs</li> </ul>



	Multi-operator stations may have processes that contradict	<ul style="list-style-type: none"> <li>• Collaborative working between operators and Network Rail to ensure process complement each other's to ensure best experience for customers</li> </ul>
	With a proposed reduction of staff, disabled customers may struggle to find staff	<ul style="list-style-type: none"> <li>• Assisted Travel lounge has clear signage where customers can communicate with staff</li> <li>• Large staff presence from different operators around the station</li> <li>• Staff primarily based at points such as the Assisted Travel Lounge, podiums and by the TVMs</li> <li>• As part of these proposals, there will be no change to volume of Assisted Travel colleagues</li> </ul>
	A customer with learning disabilities may struggle to use TVMs	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based, near the TVMs, to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>• Colleagues will have access to portable machines to sell tickets if ticket not available on TVMs</li> <li>• Tickets can be bought via a telephone call to a Contact Centre</li> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> </ul>
	A customer with cognitive disabilities may not know where to go if they are used to going to the ticket office	<ul style="list-style-type: none"> <li>• Proactive staff at the station from first to last train</li> <li>• Clear consistent signage at all stations directing to the Passenger Assistance meeting point which is not changing as part of these proposals</li> </ul>

		<ul style="list-style-type: none"> <li>• Queuing system to be implemented with a singular queue to avoid confusion, alternatively the Customer Ambassador can prioritise customer needs with a triage type approach.</li> </ul>
<b>Age</b>	Elderly customers may be more likely to want to use cash and less likely to use digital devices.	<ul style="list-style-type: none"> <li>• One Avanti TVM and two London North Western Railway TVMs in the TVM area at London Euston accept cash</li> <li>• Colleagues will have access to a portable machine to sell tickets</li> </ul>
<b>Marriage and Civil Partnership</b>	Not impacted	N/A
<b>Pregnancy and Maternity</b>	Not negatively impacted	N/A
<b>Race</b>	For many of our customers, English is not their first language. Using the ticket office can be seen as the easiest option to buy tickets and get the information they need.	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based, near the TVMs, to greet customers, provide ticket advice, share</li> <li>• Ticket websites and apps available in other languages</li> <li>• TVMs have language options for ease of use</li> <li>• Colleagues able to support use of TVMs and provide information</li> </ul>
<b>Religion and belief</b>	Some religious groups may discourage the use of digital technology	<ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support a Customer Ambassador will be based, near the TVMs, to greet customers, provide ticket advice, share</li> <li>• Customers able to purchase ticket via telephony</li> </ul>

<b>Sex</b>	Not impacted	N/A
<b>Sexual Orientation</b>	Not impacted	N/A
<b>Gender Reassignment</b>	Not impacted	N/A

### 3. Positive impacts on customers with protected characteristics

<b>Characteristic</b>	<b>Positive impacts</b>
<b>Disability</b>	<ul style="list-style-type: none"> <li>• Staff more flexible to address specific needs of customers (e.g. being able to move around stations with the customer) than they would be when behind counter in ticket office</li> <li>• Specialist ticketing staff will be able to move with the customer, so instead of standing at a counter, customers may be able to be served while seated if required</li> </ul>
<b>Age</b>	<ul style="list-style-type: none"> <li>• Specialist ticketing staff will be able to move with the customer, so instead of standing at a counter, customers may be able to be served while seated if required</li> </ul>

---

<b>Marriage and Civil Partnership</b>	As above
<b>Pregnancy and Maternity</b>	<ul style="list-style-type: none"> <li>Specialist ticketing staff will be able to move with the customer, so instead of standing at a counter, customers may be able to be served while seated if required.</li> </ul>
<b>Race</b>	As above
<b>Religion and belief</b>	As above
<b>Sex</b>	As above
<b>Sexual Orientation</b>	As above
<b>Gender Reassignment</b>	As above

---

## 4. Consultation

Consultation with impacted groups is being undertaken throughout this process. For any feedback or issues that result in more consultation needed, this will continue to take place with specific groups. Consultation will continue to take place throughout the process as more issues and opportunities are discovered. General feedback is recorded below.

Consultee	Protected characteristic	Comment raised
Accessibility Panel	Disability	New impacts added above. These focus on the need for collaboration through the process, the improvements for other channels and how staff visibility is still needed at stations.
Regional Accessibility Panels	Disability	Feedback about how staff would be found at a busy station.
Accessibility Facebook group	Disability	

Avanti West Coast welcomes further feedback on this document retailing arrangements. Feedback can be sent to [accessibility@avantiwestcoast.co.uk](mailto:accessibility@avantiwestcoast.co.uk)



