

6<sup>th</sup> September 2023

██████████  
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Avanti West Coast

(sent via e-mail)

Dear ██████████

**Avanti (AWC) Proposals under the Major Change Process of the Ticketing & Settlement Agreement (TSA)**

Introduction

I am writing to you following ██████████ letter of 5<sup>th</sup> July to London TravelWatch, setting out plans to close all ticket offices at stations where AWC is the lead retailer, as part of a wider programme of industry reform.

The proposed changes relating to London Euston fall within our geographical remit. We have been analysing the information provided to us as part of the TSA process, including the major change template spreadsheet (Annex B) and supporting documents. We are grateful to you and your colleagues for responding to our queries to date by email and via Teams' meetings.

As you know, we have also been conducting a public consultation on the proposals put forward by AWC and eight other operators in our area. The extended public consultation period closed on 1<sup>st</sup> September and during that time we received approximately 180,000 responses in total. We are continuing to process the responses, and we will provide a more detailed analysis once we have had the opportunity to complete a review of the content of all the submissions.

We will be preparing our final recommendations on the proposals over the coming weeks. This interim letter sets out our latest understanding of the proposed changes and highlights the outstanding areas of concern where we seek further clarification before reaching our final position. A set of more detailed questions related to the areas of concern is attached as an appendix.

Summary of proposed changes

We understand the main changes currently being proposed at London Euston as follows:

- closure of all 8 of the current AWC ticket office counters at the earliest opportunity within the next three years, without the short-term transition period originally envisaged in the 5<sup>th</sup> July correspondence
- redeployment of AWC ticket office staff to other areas of the station, to provide a range of customer services to passengers, as part of a wider rationalisation of the size and functions of the existing passenger-facing AWC team at the station

- replacing ticket sales at Euston's ticket office counters with a combination of online sales, purchases made via the existing 8 ticket vending machines (TVMs) managed by AWC, and sales made by AWC Customer Ambassadors using handheld ticket issuing devices.

### Areas of concern

Under the TSA, changes to opening hours may be made 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 widespread and easy access to the purchase of rail products, notwithstanding the change.

The areas of customer service of most interest to us in considering the AWC proposals at London Euston (a Network Rail managed station, shared with other operators) relate to passengers' ability to buy the right ticket easily, get good information about their journey, and receive excellent support where they have accessibility needs.

However, we have seen little detail on what scale of improvement the proposals are expected to deliver. We see instead a risk that the AWC plans for staffing and TVMs at the station could lead to long queues at TVMs to buy tickets, resulting in missed trains or a more stressful boarding experience.

Furthermore, we believe more work is needed to understand and meet fully the accessibility needs of passengers. We are also unclear how much consideration has been given to the relevance of wider developments at Euston station and in the rail industry on the proposals, and what if anything that might mean for the design and timing of any changes.

In the five sections immediately below, we elaborate on the nature of our concerns and (taken together with the questions in the appendix) the specific issues on which we seek clarification.

### *Expected impacts of the proposals*

The information provided on post-implementation monitoring refers to measures which would be used to establish the impact of the changes once implemented. It is important for us to understand which specific measures are meant, and what is the current quality of service as reflected in those measures, as this effectively provides the baseline against which we are being asked to assess the merits of the proposals.

You have offered to arrange a presentation to London TravelWatch on the current position, which we look forward to receiving. It is also important to us to understand how far AWC expects the baseline measurements to improve as a result of the proposed changes, both to help us sense-check the proposals and to help passengers hold AWC to account in future, should the proposals be approved for implementation.

The TSA also refers to changes in ticket office hours which may be made where they represent an improvement in cost effectiveness. We have yet to see any quantitative information on the projected costs and benefits for the proposed changes.

### *Overall level of staffing*

Our reading of the proposals at Euston is that they involve a significant cut in the numbers of staff providing customer service compared with now, combined with a reduction of between 1-2 hours at the end of the day when AWC staff will be available to serve customers.

Current staffing numbers appear to consist of between 36-44.5 relevant FTEs daily, depending on day of the week, including ticket office staff, but excluding Revenue Protection Officers and cashiers. In future, depending on the day of the week, there will be between 10-14 FTE Customer Ambassadors with a range of functions, of which 9 will be deployed during available hours.

Taken together with plans for ticket retailing (see below), we find it difficult to understand how the existing quality of service at the station will be sustained, let alone improved, in helping passengers buy the right ticket, have the right information and board their train. We would therefore welcome further clarification on proposed future staffing numbers.

Euston is periodically affected by significant service disruption. At these times, the combined resources of NR and TOC staff can struggle to manage the numbers and movement of people around the station, and to keep passengers reliably informed. All other things being equal, the proposals to reduce significantly the numbers of available AWC staff at the station at any given time only looks set to put the resilience of the station at times of disruption under greater pressure.

We are also concerned that potential further cuts in staffing could at some point in the future be made without the same degree of scrutiny and challenge as now. Under the TSA, major proposals to change ticket office hours trigger consultation with the public and passenger watchdogs. Once the ticket offices are shut, there are no similar requirements on operators to consult on potential future changes to the staffing levels being proposed now.

### *Future ticket retailing capability at Euston*

From the information you have provided, we understand that:

- the current ticket office counters currently sell just 1% of customer ticketed journeys originating at Euston, down from 4% in 2014, and AWC's assumption (apparently in line with industry thinking) is that 25% of those sales will migrate to TVMs
- AWC has no plans to increase TVM numbers or their functionality. In discussion, you have said that the current number of AWC TVMs (which are relatively modern) provide enough headroom to handle an increase in transactions
- AWC intend to locate 3 Customer Ambassadors near the TVMs to support passengers, and the Customer Ambassadors will have access if needed to the same Avocet handheld ticket issuing devices as those which are used today at the ticket office counters. The implication is that the full range of tickets which can currently be sold at Euston would still be available in principle, should the proposals go ahead

- there are no agreed plans to change the location of the AWC TVMs in the ticket office hall, but there is interest in considering whether there are potential alternative uses for the hall which might have an impact on future TVM location.

As indicated above, we find it difficult to understand how a smaller customer-service team can rely on the same number of TVMs to serve ticket sales while at the same time answering customer queries and helping with boarding without having a negative impact on queuing to buy tickets. Understanding the modelling and empirical evidence behind the assumptions about channel shift and adequacy of TVM + handheld capacity is therefore an important area of clarification for us.

We are also concerned about the possibility that, at some point after the proposed changes (if approved) are implemented, there might be a move to end sale of more specialist/lower volume fares products via TVMs or handheld devices. We would welcome written clarification on whether this is a possibility and, if so, what safeguards would be in place to protect customers' interest.

#### *Support for passengers with accessibility needs and ensuring safety*

We note that under the proposals, the existing Assisted Travel Lounge on the station concourse at London Euston would remain. You have also confirmed the ongoing presence of the team of NR accessibility staff who provide Passenger Assist and Turn Up and Go services, and we understand there is no plan to change this resourcing.

We note the from the workbook that 4 FTEs in the current AWC team at London Euston are identified as having a role in providing accessibility support, alongside the NR team, but that the proposed move to Customer Ambassadors envisages none of the team having such a role. Please confirm how, if correct, this will not adversely affect the Passenger Assist and Turn Up and Go services provided at the station.

The Equality Impact Assessment (EqIA) for London Euston highlights a range of potential impacts arising from the proposed changes, particularly for Disabled passengers including those who use wheelchairs and those with impaired vision and hearing. While the EqIA identifies a number of mitigations, it appears that the work to understand potential impacts and how they might be addressed is not yet complete. We are also unclear about how far the needs of passengers with cognitive disabilities have been considered in the EqIA.

There are references to accessibility user trials for TVMs, the website and app which are taking place and which might inform potential improvements; a review of the requirement for induction loops and innovations designed for larger areas (we note that induction loops are already available at two locations in the station); and reviews of the queuing system at TVMs to ensure they are suitable for disabled customers. The outcome of these trials and reviews, and a commitment to implement suitable mitigations, need to be established and validated with relevant passenger user groups before the proposals can be approved.

The EqIA identifies that the continued migration of ticket sales to online and digital channels which would be encouraged under the proposals could impact certain types of passengers, including but not confined to Disabled passengers. We know from our own research that passengers with a range of characteristics face barriers in using digital sales channels.

For example, in our report *Left behind Londoners* (March 2023), 1 in 6 of those surveyed said they had been unable to buy a ticket without a smartphone or internet connection, which had

stopped them from travelling. These barriers to travel are exacerbated by the complexity and variety of ticket options for rail travel, particularly beyond London and its immediate hinterland. We would like to understand better how far such insights have been reflected in assumptions about future channel shift and in the range of potential mitigations which might be adopted.

On safety, the British Transport Police (BTP) has written to inform us that the Department of Transport and others have committed to an extensive programme of Safety, Security and Vulnerability risk assessments of the industry-wide proposals for closing ticket offices. These assessments need to be completed, with mitigations agreed and implemented, before the proposals can be taken forward.

### *Potentially relevant wider developments*

We would like to understand better how much thought has been given to the interaction between wider developments, both at London Euston and in the wider rail industry, and the AWC ticket office proposals. We believe that this issue is relevant to the quality of service experienced by passengers which might be impacted by the proposed changes, and to the timing of their implementation, if the proposals are approved.

For example, in our recent exchanges and meetings, we have learnt that consideration is being given to installing a new gateline at the station affecting all operators, including AWC. As mentioned previously in this letter, you have indicated that there is interest in potential alternative uses for the ticket hall, should the proposals go ahead.

Putting aside for now the impacts which a future HS2 station in the immediate vicinity might have on passengers' experience of using the existing station at London Euston, we also note that currently there are works in progress in and around the concourse. These are potentially relevant to one of the areas identified in the EqlA, namely the degree to which the busy concourse can be disorienting to customers.

You have already offered to follow up with further information on some of these specific developments, which we look forward to receiving. We believe that at least in principle they could create both challenges and opportunities relating the quality of service experienced by passengers at the station. For example, these might impact on the future location of TVMs, ease of wayfinding through the station, and boarding arrangements – all of which have a bearing on the functions of the AWC staff affected by the ticket office proposals, the potential consequences of which are important for us to understand when assessing the proposals.

Similarly, we would like to understand better how far the proposed ticket office changes at London Euston have been considered in the context of industry-wide discussions about fares reform. This initiative, if done well, has the potential to improve passenger confidence that they can get the best value ticket for their journey. Logic would suggest that, for passengers, it would make sense for such reform to be successfully implemented before introducing changes which reduce the numbers of staff at the station, and on whom many passengers currently rely for help in buying their ticket.



Next steps

We would welcome responses to these points and our questions by **Wednesday 27<sup>th</sup> September**. Given the numerous and, in some cases, complicated issues raised, we are happy to meet to discuss these in more detail. It should be noted though we will still require formal written responses on these points if they are to be considered in our final submission.

Please also note that when we publish our final submission we also plan to publish this interim letter and your written response(s) to it.

Yours sincerely,

[REDACTED]

[REDACTED]

London TravelWatch

## Appendix – Specific clarification questions

### *Expected impacts of the proposals*

What quantitative assessment has been made of the overall costs and benefits of the proposals (for example, in terms of the impact on staff costs and fares revenue), and over what period of time?

What are the intended specific measures of customer service quality and what is the current picture provided by the data generated through those measures?

We understand that there are queuing time standards for ticket offices (three minutes off peak and five minutes in the peak), but that these do not apply to TVMs. Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?

What monitoring regimes will be used to measure the time taken and quality of assistance provided to those passengers with accessibility needs? What is the current picture provided by the data generated through any existing monitoring?

### *Overall level of staffing*

Please clarify how daily FTE totals and shift patterns compare for the current and proposed deployment of AWC staff at the station in customer-service roles. Please explain what stress-testing has been done to establish the resilience of the staffing proposals to manage sickness and leave, vacancy levels and the impacts of train service disruption at Euston.

How would any new staffing arrangements be advertised to passengers in place of the present arrangements to advertise ticket office opening times? How will compliance with any new hours be monitored and reported?

What arrangements will be put in place to ensure that a fixed, advertised staff presence will not subsequently be substantially reduced or removed without further passenger consultation?

Will all Customer Assistants have the same high level of training in the full range of ticket products to ensure there is maximum flexibility to provide expert assistance in navigating the complex fares system and ensure passengers get the right ticket?

What should passengers do if they cannot find or buy the ticket they need on a TVM, or get the information they need for their journey, and there are no staff available to help (for example, at the time of the first and last trains)?

### *Future ticket retailing capacity at London Euston*

What is the evidence to support AWC's view on the expected shift of ticket sales to online channels and TVMs if ticket offices are closed, and over what timeframe? As previously agreed, please also supplement the information given on the changing pattern of ticket sales through London Euston ticket offices and TVMs with the data in nominal terms.

Please provide evidence to show that the proposed combination of staff, TVMs and handheld devices will be sufficient to handle future ticket sales at the station, especially at peak hours. This should include information on

- overall and remaining TVM capacity (factoring in existing sales and Ticket on Departure collections per hour);
- contractual Service Level Agreements (SLAs) for TVM availability and for fixing out of order TVMs, and recent delivery against those SLAs
- the forecast level of cash sales of tickets at the station and the level of planned TVM capacity to service those sales
- the proposed numbers and functionality of handheld devices (for example, can they service cash sales) available to on-duty staff, and ease of access to them, compared with current arrangements at the station.

AWC has previously clarified that some facilities currently available from ticket offices today would not be available from a TVM, such as change of journey, excess fares, seat reservations and refunds, and that under the proposals these would be facilitated by a Customer Ambassador with a handheld device. Can you confirm that the current full range of facilities will continue to be available via a Customer Ambassador with a handheld device – for example, including split ticketing and annual season tickets?

Please clarify whether there is a possibility that, at some point after the proposed changes (if approved) are implemented, there might be further moves to end the sale of more specialist/lower volume fares products via TVMs or handheld devices – and if so, what safeguards would be in place to protect customers' interests.

#### *Support for passengers with accessibility needs and ensuring safety*

Please confirm how the proposals to replace the 4 FTEs in the current AWC team at London Euston identified as having a role in providing accessibility support, will not adversely affect the Passenger Assist and Turn Up and Go services provided at the station.

What supporting evidence do you have to show that measures aimed at mitigating the risk of digital exclusion would be adequate? Do you have any existing programmes designed to tackle this issue, and if so, how effective have these been?

Please provide details on the outcomes of the accessibility user trials and accessibility-related reviews referred to in the EqIA.

Please provide details of any concerns with the BTP may have raised with you about potential safety and security risks to passengers and staff arising from AWC's proposals for London Euston.

#### *Potentially wider relevant developments*

We look forward to receiving further details about relevant wider developments at London Euston, as highlighted above in the main letter.