

31 October 2023

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Avanti West Coast

(sent via e-mail)

Dear ██████████

Avanti West Coast (AWC) Proposals to close ticket offices under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing to you following your letter of 5th 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 station 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, your letters of 27th September and 12th October in response to ours of 6th September and 5th October (available in the annexes), and other supporting documents. We are grateful to you and your colleagues for responding to our queries throughout the process through email and via Teams' meetings, which have also helped inform our decisions.

As you know, we have also conducted a public consultation on the proposals put forward by AWC and eight other operators in our area. The extended public consultation period closed on 1st September and during that time we received 232,795 responses in total. 17,473 of these responses were specific to AWC. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

We understand the main changes 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. A short-term transition period was originally envisaged in the 5th July correspondence: your letter of 12th October refers to a “medium-term transition period, where it is expected that a greater volume of customers may require help”

- redeployment of AWC ticket office staff roles, so that a range of customer services are provided through new Customer Ambassador roles, primarily located in the main Ticket Vending Machine (TVM) area of the station. This is part of a wider rationalisation of the size and functions of the existing passenger-facing AWC team at the station
- replacing ticket sales at London Euston's ticket office counters with a combination of increased online sales, purchases made via the existing 8 TVMs managed by AWC, and sales made by AWC Customer Ambassadors using handheld ticket issuing devices
- a small reduction in passenger-facing AWC staffing hours at London Euston at the start and end of the day, such that the final two AWC services (Monday-Friday and on Sundays) and some services of other train operators depart before or after Customer Ambassadors with specialist ticketing knowledge are on duty.

Public response to the changes

During the consultation period London TravelWatch received a total of 232,795 representations via email, freepost and phone.¹ These were a combination of responses to individual stations, specific Train Operating Companies (TOCs), and to the proposals across all companies and stations. Of these 231,471 (99%) were objections. 57,179 responses objected to all changes across the rail network.

There were specific campaigns which generated a large number of responses including template emails and post. While the majority of these responses followed the standard text some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received postal petitions with a total of 15,923 signatures objecting to ticket office closures. We also received copies of the following online petitions:

Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>

Megaphone - <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices>

We are also aware of the following online petitions:

Parliament - <https://petition.parliament.uk/petitions/636542>

38degrees - <https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition>

We also received a survey report from 38 Degrees with 26,194 responses objecting to the changes nationally.

We also received many responses from stakeholders including MPs, local authorities and representative organisations.

¹ Please note some of these responses will overlap with those received by Transport Focus, as some representations were jointly sent to both organisations.

AWC received 17,473 responses specific to it. Of these 17,462 were objecting to the proposals. 278 objections specifically named London Euston in their response.

The top three issues in these responses were concerns over the ability to buy tickets in future (including needing staff to help them navigate the complexities of the fares system and difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. Throughout the responses the importance and value of staff in delivering these services and support was highlighted time and again.

It is important to note that these are the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area – it was not a national consultation. Therefore, it was possible for people to choose to respond to multiple station and/or TOC consultations.

Our role under the TSA

London TravelWatch has a formal role in assessing Major Changes to ticket office opening hours. If a train company wishes to make such a change it must follow the process set out in the TSA.

Under clause 6-18 (1) of the TSA, changes to opening hours of ticket offices may be made if:

- a. the change would represent an **improvement** on current arrangements in terms of quality of service and/or cost effectiveness and
- b. members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

London TravelWatch may object to a proposal on the grounds it does not meet one or both of these criteria. To assess this, we have reviewed the following factors, which we have derived from section 5 of the Secretary of State's TSA ticket office guidance (21 February 2023):

- **Quality of service.** This includes the number and skills of station staff and hours deployed, availability of facilities like toilets, waiting rooms and lifts, and provision of information such as wayfinding, routes, and during disruption.
- **Access to products.** Can passengers easily buy the right ticket for their journey? This includes the product range available at the station and off-site, support to get the ticket including advice on the correct fare, and retail capacity. Passengers should also be confident that if they have to travel without a ticket (for example if it's not available at the station) then they will not be unfairly penalised.



- **Accessibility.** Passengers needing assistance should receive this in a timely and reliable manner. This includes arrangements for booked assistance, the ability of passengers to ‘turn-up-and-go’, the ease of requesting assistance, the ability to pay by cash or card, and the accessibility of ticket purchasing methods including ticket vending machines (TVMs) and non-digital options.
- **Safety.** This includes both perceived and actual security, access to help if needed, and support if there is a safety issue.
- **Future monitoring.** How will train companies ensure that changes are working well for passengers? In addition, what, if any, protections are in place to ensure that, where appropriate, passengers are consulted on future major changes to staffing?
- **Cost effectiveness.** Do the financial benefits outweigh any costs that the changes may incur, including through funding mitigations or any potential loss in revenue?

Our assessment of the proposals

London TravelWatch understands how AWC’s proposals in principle might benefit passengers. Redeploying staff potentially allows them to provide a more personal service, to a larger number of people at the station than the declining proportion of passengers who visit a ticket office, whilst at the same time making more effective use of their time and skills. This in turn could allow the railways to run more efficiently and so improve their financial sustainability.

The key question for us is whether the evidence that has been provided is robust enough to show that the benefits to passengers mark an improvement on the current system and will be evident from day one of the proposals being implemented.

We share the view expressed recently by the Transport Select Committee that it is “perplexing” that the rail industry has put forward proposals before the promised simplification of fares and ticketing has been delivered. Part of the reason why passengers value the presence of ticket office staff is because, for some, they are an essential source of advice in buying the best ticket for their journey. That arises from the perceived complexity of today’s rail fares and the fear that passengers may not be getting the best deal for their travel. We believe that closing ticket offices should happen after fares reform has taken place and shown to be a success.

Nevertheless, we have considered carefully the results of the public consultation on your original approach and, together with our own analysis of the proposals themselves, we have come to the following views on the aforementioned 6 factors.

Quality of service



Our focus under this category is on the potential impact of staffing hours and staffing levels: as a Network Rail managed station, we understand that the plans to close the AWC ticket offices will have no impact on the availability of station facilities at London Euston.

The proposals aim to improve service quality through a more visible staff presence at the station, particularly near the AWC TVMs currently located in the ticket office hall. Customer Ambassadors would be more available to passengers in helping them buy tickets, providing information about services, giving wayfinding directions around the station and offering pre-boarding support.

We note that overall staffing hours for passenger-facing roles are due to be reduced by two hours at the end of the day (Monday-Friday), 1 hour at the end of Saturdays and by a total of 3 hours at the start and end of Sundays. These are currently periods of low ticket office activity and AWC intend that Revenue Protection Officers will be available if needed to offer passengers help in buying a ticket. Our view is that the proposed change in hours would have marginal impact and does not represent an improvement in service.

We also note, from the information provided in Appendix 1 of your 12th October letter, that the numbers of passenger-facing staff on duty compared with current rosters are due to be cut. The proposed roster for Monday-Friday would see a reduction in members of staff on duty hourly to between 17% and 63% of today's roster, depending on time of day. AWC's justification is that the rosters are outdated and, when combined with other factors (see next section on access to products), are not well-aligned with current/forecast transaction volumes at the station.

However, during the 16-hour day covered in the Monday-Friday roster, the numbers of passenger-facing staff on duty and not serving behind a ticket office counter, compared with today's equivalents, would be greater during 3 of those hours, the same during 4 of those hours and fewer during 9 of those hours². Overall, this suggests a *less* visible staff presence than today and thus a lower level of service.

The profile of proposed hourly staff deployment during weekdays appears broadly to mirror the hourly pattern of current ticket office transaction volumes. We can also see how the future hourly numbers of staff who could help with buying a ticket (while also dealing with other passenger queries) is driven by assumptions about how many ticket office users might switch to TVMs, the proportion of those users who might need help and the average time taken per transaction.

Even if these assumptions prove accurate, the scale of reduced deployment for 13 of the proposed 16 weekday staffed hours - from between c10-18 ticket office staff and floor walkers hourly today to between 2-4 TVM retail support and triage staff hourly in future – look sufficient only to maintain service quality at broadly today's levels, rather than to improve them.

² This compares figures for floor walkers (including info podium) and pre-boarders in the current roster with TVM retail support, triage, info podium and pre-boarders in the proposed roster.

The proposed staffing levels between 0800-1000 on weekdays look particularly tight. In your presentation to us of 12th September (“Euston overview”), your helpful heat map of minimum number of desks needed to process the average number of transactions by hour indicates that between 3-4 desks would be needed hourly on weekdays between 0800-1500, assuming 2 minutes per transaction. The proposals however suggest there would be just 1 TVM retail support staff member available from 0800-1000, whereas 2-3 TVM retail support staff members would be deployed 1000-1500.

We have not seen proposals for rostering of staff in customer-facing roles at weekends, and we have seen few details about the additional support which AWC intend to provide during a medium-term transition period. Taken together with our observations above regarding staffing levels and staffing hours, we are unable to conclude that the proposals would result in an improvement in quality of service.

Outside of the AWC proposals, we are aware there are other planned changes to the passenger experience at London Euston. We believe it is important that, for the AWC proposals to proceed, they should be “joined up” as far as possible with those changes.

For example, if the Euston Immediate Capacity Measures (EICM) programme delivers better information and wayfinding at the station, as intended, all other things being equal that could reduce the need for passengers to approach staff with queries. In principle, that would work in kilter with the reduced staffing which forms part of the AWC ticket office proposals but it needs to be completed before its benefits can be felt.

The EICM programme also includes plans for a major new gateline, the timing of which is yet to be confirmed. While that may bring customer benefits in time, we believe that it would be prudent for any significant reduction in the AWC customer-facing team at London Euston not to happen until the new gateline has had time to bed in satisfactorily. It is also our understanding that West Midlands Railway may be considering changes to its team currently based at London Euston. We believe there needs to be more clarity about the combined impact of these and any potential AWC staffing changes on the whole station passenger experience before the AWC proposals to close its ticket offices can be approved.

Finally, we are concerned that in future passengers would not have the same opportunity to scrutinise and comment on potential further changes to staffing levels as today. This is because the TSA process would not apply in a situation where there is no longer a ticket office at London Euston.

The rail industry has argued that this concern can be addressed through the current arrangements under which operators comply with an ORR-approved Accessible Travel Policy (ATP). It is good that the industry has now recognised there is an issue here, but the ATP proposal has emerged at an advanced stage of the consultation process and has not been fully explored.



Our view is that the ATP approach offers weaker protection for passengers' interests than the TSA, under which bodies such as London TravelWatch are not merely consulted, but are asked to approve or object to proposals. We recognise that satisfactory resolution of this issue is not something that AWC can determine alone, but until it is in place we object to the proposals to close the ticket office at London Euston.

Access to products

Our focus in this category is on how far AWC's proposed combination of TVM capacity/capability and staff support at the station would, alongside other sales channels, ensure continued widespread and easy access to the purchase of rail products.

AWC have helpfully provided headline information on ticket sales trends over the last decade to provide context for your proposals. In 2014, tickets bought at the London Euston ticket office or TVMs accounted for 24% of trips on AWC trains originating from London: that figure had fallen to 6% in 2023, as passengers switched to non-station retail channels such as online. The sales volume from the ticket office itself fell from 1.3 billion in 2014 to 0.5 million in 2023.

In light of that trend, and the potential for a further shift of sales away from the station, we welcome the confirmation from AWC that under its proposals it would still be possible for passengers to buy the same full range of rail products at London Euston as today. That will be possible through the combination of transactions via the existing fleet of TVMs (whether entirely self-serve or with the help of nearby ticketing specialist staff, trained to the same levels as current ticket office staff) and via handheld ticket-issuing devices which are currently used in the ticket office and which will in future be available to the specialist ticketing staff.

Based on the information which AWC have provided to us, we are also satisfied that there is sufficient capacity in the existing 8 AWC TVMs to cope with future demand at the station, even assuming a conservative further shift of sales online.

Accessibility

We know from responses to the public consultation that there is much concern about the potential impact of the ticket office closure proposals on those passengers who have particular needs when boarding/alighting trains or buying tickets.

We note that Passenger Assist and Turn Up and Go services at London Euston are provided by Network Rail staff. AWC have helpfully confirmed that the NR team available to provide assistance with accessibility is not affected by the ticket office proposals and that the current Assisted Travel Lounge will remain the meeting point for passengers who need assistance.



Under the AWC proposals, we note the opportunity for floor walkers to complement existing assistance arrangements by escorting passengers if needed to the Assisted Travel Lounge. However, we have queried above how far the proposals would increase the numbers of staff available to provide this and other types of support, compared with today.

We also note that train operators have proposed an industry-wide concept of Welcome Points as a constructive response to concerns about the potential impact of ticket office closures on accessibility. We think there is merit in the Welcome Points idea, but there is much that still needs to be developed. We are unclear whether that would mean any changes to the arrangements at London Euston and it would be helpful to have clarity on this point. We have said separately to the Rail Delivery Group (RDG) that there needs to be endorsement of the Disabled Persons Transport Advisory Committee (DPTAC), Disabled people and representative groups on the concept, design and implementation of Welcome Points to secure our support for this aspect of operators' proposals to close ticket offices.

With regard to buying tickets, AWC have helpfully confirmed that passengers will still be able to carry out cash transactions at London Euston. This will be through the cash-enabled AWC TVM(s), which have enough capacity to accommodate a 100% transfer of cash volumes from the ticket offices; handheld ticket-issuing devices deployed by specialist ticketing Customer Ambassadors; and cash-enabled TVMs managed by West Midlands Railway at London Euston. We also note the continued availability of the AWC telesales team based in a contact centre as another option for those passengers who are unable or who choose not to use digital channels.

We note that AWC has recently commissioned an independent company to carry out TVM user trials consisting of 29 Disabled users, covering multiple disabilities, and we welcome this initiative. At the time of writing, AWC are waiting to receive the report of the trials. We would want to know that any recommendations arising from the report had been implemented before approving the proposals to close the ticket offices at the station.

Safety

We welcome the discussions which AWC have held with the British Transport Police (BTP) about the safety and security aspects of the proposals to close ticket offices at London Euston. We note the intention to complete a Crime and Vulnerability Risk Assessment (produced by the Department of Transport in collaboration with the BTP). Our view is that that should be done and any mitigations identified as necessary implemented before we can approve the proposals.

Similar to our earlier comments about quality of service, we think it is important that consideration of safety and security should be approached from a whole-station perspective. In our discussions, we have highlighted the need to consider how your proposals to reduce staff might have an impact on passengers' experience specifically during times of disruption at London Euston. We note the ORR



improvement notice served on Network Rail on 18th October 2023, following Network Rail's failure to put in effective measures to prevent risks to passengers and others during instances of surges and overcrowding.

Future monitoring

We believe it is important to have clarity in advance about the arrangements to monitor the implementation of the proposals. Having a clear set of agreed, publicly-reported yardsticks on quality of service allows operators to show how well their proposals are working and helps passengers to hold operators to account.

AWC have identified three specific customer satisfaction measures (and their recent scores) and more generally have referred to obligations under their contract with the Department for Transport regarding metrics on customer service, accessibility, safety and ticket retailing and revenue which might be relevant to monitoring implementation of the proposals at London Euston.

We also note that the Rail Delivery Group (RDG) has said that, to ensure an impartial baseline and assessment of the proposals is available, operators propose to use the National Rail Passenger Survey previously conducted by TF. As that survey was paused in 2020 due to Covid, the RDG has been developing the Rail Customer Experience Survey which is due to start in 2024 and which it is suggested will track future metrics.

Our view is, taking all these points together, there is considerable work yet to be done by AWC working with other operators, passenger bodies and others to agree which specific core metrics will be used and which recent measurements will be used to provide a meaningful baseline against the success or otherwise of the proposals could be measured. We would also have expected to see some indication of the expected future movement in the measured scores to support AWC's view that the proposals will deliver an improvement in one or other aspect of quality of service. We need the arrangements for future monitoring of implementation to be agreed with us and in place before we can endorse the proposals.

Cost effectiveness

Under the TSA, cost effectiveness is one of the specific criteria we are asked to consider in assessing the proposals. AWC have explained to us that a full cost benefit analysis of the proposals has been carried out to ensure that value for money is delivered for both the passenger and the taxpayer. However, you have not been able to share any figures due to the confidential nature of commercially sensitive information.

We understand that some of the information may be sensitive, but we are disappointed that the industry has not been able to find a way, at individual TOC level, to share some quantitative detail in terms of the overall scale of net financial



benefit; the ratio of benefit to costs; the full set of costs and benefits assessed; and the payback period.

The lack of available evidence is all the more remarkable given the emphasis that has been placed by the rail industry and government on improved value for money as a selling point for the proposed closure of ticket offices. Without this information, we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness. We therefore have little option under this category but to object to the proposals.

Decision and next steps

Given the above assessment, London TravelWatch objects to the proposals put forward by AWC based on the following reasons:

- based on the proposed reduction in staffing levels on weekdays, and the lack of information about weekend staffing levels, we are unable to conclude that the proposals would result in an improvement in quality of service
- agreement has not yet been reached with the rail industry on how passengers' interests might best be represented in future, should proposals be brought forward for further staff reductions after the current ticket offices are closed
- we have not yet the opportunity to consider the results of the recent TVM user trials have not yet been shared, nor any recommendations to address identified accessibility issues implemented
- the proposed Crime and Vulnerability Risk Assessment has not yet been completed, nor any identified mitigations implemented
- a set of specific core metrics and baseline measurements has not yet been established against which to measure the impact of the proposals
- we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness.

If AWC still wishes to proceed with these proposals, in order for us to withdraw our objection we would require these issues to be fully addressed first. Alternatively, AWC may appeal our decision to the Secretary of State for Transport, at which point our involvement in this process will end.

We would like to extend our thanks to you and your colleagues for engaging with us throughout this process. If you have any questions please do let us know.

Yours sincerely,





, London TravelWatch

