

Consultation Feedback Responses

PASSENGER BODY	GENERAL THEME	COMMENTS/ISSUES/QUESTIONS	CHILTERN'S RESPONSE
	Retail facilities	<p>What assumptions have you made about how many / what proportion of people will move to digital if ticket offices are closed?</p> <p>Do you have any assessment of how your move to a multi-skilled team at Bicester Village and Oxford Parkway stations has worked? Did this include any programmes designed to help people migrate to digital and if so, how effective have these been?</p> <p>Have you made an assessment of who will not / cannot move to digital and the effect on them of closing the ticket office?</p> <p>How accessible is your app and your website, especially for those with a disability?</p> <p>Do you have any forecast of the impact on revenue – i.e. in how many people will no longer travel as a result or will now travel without paying?</p> <p>Why is the use of MTIS a 'contingency' rather than a formal retail channel?</p> <p>How will people know that they can buy a wider range of tickets if they approach staff and ask?</p> <p>What reassurance/ evidence can you provide that retail arrangements at each station will have sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours and at those stations with a higher than average proportion of sales from the ticket office?</p> <p>Has any assessment of the TVM capacity at each station has been carried out? 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?</p> <p>What assessment have you made of the impact of seasonal peaks, especially at tourist destinations?</p> <p>Has any assessment of the location of TVMs been carried out – are they in the right place to meet demand?</p> <p>How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?</p> <p>What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?</p>	<p>It is difficult to estimate the level of migration away from ticket offices since our proposal would mean existing ticket office staff would still retain the ability to sell tickets via our mobile ticketing devices. However, given the natural trend towards increasing digital share in recent years we envisage that trend will continue. We also expect TVMs to see increased usage, having plateaued in recent years. We plan to review the channels by which our customers purchase their fares as part of this change process.</p> <p>The Bicester Village and Oxford Parkway stations model is working well to provide an efficient service for our customers. The vision behind the stations was to provide a team of people who could be flexible and multifunctional, with a focus on excellent customer service. It was important to have team members who understand and can engage easily with people. The retail strategy was to provide a self-service approach to purchasing tickets via TVMs, and access to station services via online services where possible, and only use the central point facilities if needed.</p> <p>Currently, station teams have a good relationship with customers, and where customers are unable to use TVMs, our station teams are at hand to assist with ticket purchase using the MTIS device. All tickets are available for purchase online, TVMs or at stations.</p> <p>The model has enabled customers to move to TVMs for general purposes and allows focus on lengthier services such as season ticket sales. Feedback from regular customers on this route suggest a change in customer behaviour in how they purchase their fares, to and from these stations to reflect the channels available such as TVM or online.</p> <p>This model has led to two National Rail awards for excellent customer service.</p> <p>Oxford Parkway/Bicester Village - current situation The number of TVMs at each station: • OXP - 5 • BIT - 5</p> <p>Cash transactions Cash is handled mainly through the TVM's, however we still have MTIS devices to support where required for tickets not available via TVMs.</p> <p>Experience of staff at Bicester Village and Oxford Parkway • Allows staff to move around the station offering 'general customer service' • Focus on staff training with good customer services skills • Colleagues working together to support customers with TVMs, customer assistance and platform support • More friendly relationship between passenger and station team members • Encouraging customers to use TVMs for general ticket purchases, allows station teams to focus on complex purchases such as season tickets • Brings colour to the role, enabling a choice of tasks to be actioned around the station by all station team members, rather than being fixed to a position/role • Skills and knowledge of station team members equal among all at stations</p> <p>A full Equality & Diversity Impact Assessment has been carried out for each station to ensure those with protected characteristics are not disadvantaged (see our EDIA for reference). There will be customers who do not fall within the protected characteristics that are anxious about moving to digital which is why our proposal to bring our staff into a more physical customer facing position will enable customers to purchase the tickets they want with the assistance to use TVM or other digital means. Our EDIA was published (and was made available in alternative formats) during the public consultation.</p> <p>Link to our EDIA - https://www.chilternrailways.co.uk/sites/default/files/2023-07/Complete%20EDIA%20for%20ALL%20CRCL%20Stations.pdf</p> <p>We are currently working towards WCAG 2.1 AA accessibility standards (defines how to make Web content more accessible to people with disabilities, this level is used in most accessibility rules and regulations around the world). The website is 95% complete and should be fully compliant by the end of this year. We would update our app to be WCAG 2.1 AA compatible subject to funding.</p> <p>We do not anticipate a material impact to revenue, our proposal retains the ability for customers who currently purchase at a ticket office to continue to purchase from a station team member using a mobile ticketing device.</p> <p>We encourage customers to buy tickets via TVMs and through online facilities. MTIS will be a supporting device at all stations as they are today, to retail products that we are not able to provide through other retail channels. Currently, when queues are longer than usual at TVMs or ticket offices during occasions such as Wembley events or industrial action, station team members are able to support using MTIS devices to control queues for ticket purchases and collections from TVMs.</p> <p>We will produce targeted customer communications taking into consideration our current customer insight. We will use all our existing channels to raise awareness of the services and products we provide, and how customers can access them including through our station team members.</p> <p>We are not expecting a higher than average capacity for tickets at our stations as a result of our ticket offices closing. Our customers will continue to be able to buy retail products with support from our station team members to use the TVMs. Tickets not available via TVMs can be purchased at our stations during trading times as they are today. Subject to funding from DfT, we will be enhancing the software on our TVMs to provide additional functionalities.</p> <p>We have not needed to carry out additional assessments, as we are retaining MTIS devices at all locations. We are not expecting any significant changes to demand to existing ticket sales. However, we will continue to monitor the sale of tickets from TVMs, and any changes to the reservation of tickets for collection at stations via TVMs. Between 2019 and 2022 - the share of journeys by channels is seeing a significant shift from ticket office sales to online and self-service purchase.</p> <p>Our proposals will not reduce hours of coverage at stations and our station team members will still be able to sell tickets via our mobile ticketing devices, as well as supporting customers using TVMs. It is therefore not envisaged there will be any detrimental impacts during seasonal peaks compared to our current offering. We will carry out regular reviews during seasonal peaks to assess any potential impact. We are maintaining the same staffing hours as we have today, however, we have assessed the quantity of staff we require to continue to provide the right level of services based on our station data, and we will not be looking to make any reductions that impact on our current offering.</p> <p>We are currently drawing up plans for each station. Consideration will be given to the appropriate location of TVMs to ensure they are situated in the most suitable location at stations for our customers, and our station colleagues to be able to provide assistance subject to funding.</p> <p>Retail provision will remain as they are today. However, we will monitor customer satisfaction and enquiries through our existing channels to ensure retail arrangements remain adequate. Our retail internal audits will continue to support our service provision.</p> <p>All locations will be staffed multi-skilled colleagues who will help with impartial retail obligations. There will be no impact on this as a result of the reform.</p> <p>We can confirm that the fares listed below can still be purchased/accessed from our stations in future as per our current arrangements.</p> <p>National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion) - This is available via TVM or MTIS o Boundary Zone add-ons Currently only available via MTIS o Staff travel discount Currently only available via MTIS o Buying tickets in advance rather than on the day of travel TVM or MTIS o Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements) TVM or MTIS o Seat reservations if accompanied by a ticket sale, both MTIS and TVM. If a res for an existing sale, then via MTIS only. o Changing a booking/tickets Only via MTIS o Use of rail vouchers Only via MTIS o Use of rail warrants Only via MTIS o Ranger and Rover tickets Only via MTIS o Car parking TVM or MTIS o Plus Bus tickets if accompanied by a ticket sale, MTIS and TVM. If an add-on to existing, only via MTIS. o Ferry connections Only via MTIS o Group Save MTIS or TVM o Off-peak purchases before the off-peak begins MTIS or TVM o Cycle reservations Only via MTIS o Photocards for season tickets From a station teams - this is a manual process and cannot be provided online, via TVMs or MTIS device o Scholar tickets N/A - only via our Business Travel service. o Sleeper bookings Only via MTIS o CIV tickets for connections with Eurostar international services Only via MTIS</p> <p>In addition to the above fares, sales of Railcards are also fairly high. In 2021/22 we sold in £240k worth of Senior Railcards from our booking offices. With the current proposal to retain MTIS, we will continue to be able to retail Railcards at the retail points.</p> <p>Clarification of provision of photocards for season tickets: The provision of photocards for season tickets is a manual process for our stations that does not require TVM/MTIS devices. Our stations will need to stock blank photocards and the manual process can be carried out if required at our current central points. All tickets/services would be available at ticket sales as they are today. When customers are unable to purchase their tickets in advance via digital channels, they will be able to purchase at stations via during trading times via the MTIS device or using TVMs.</p> <p>All the tickets listed in column 16 will be available via TVM or an MTIS device.</p> <p>Yes. Most of the approaches for enhancements to TVMs require engagement with the TVM suppliers and development activity. Initial estimates for the development time required for specific products are being reviewed. In most cases these changes are not planned to be completed until mid- to late-2024, however a number of interim mitigations are proposed to ensure passengers are not disadvantaged. Final plans will be dependent on funding agreements and our contracts with suppliers. All tickets will continue to be available for purchase as they are today, with many available online. Our team members will be trained and have access to a mobile ticket machine for any products, if customers are not able to purchase them online or cannot use the self-service ticket machines. In the very small number of cases that a customer is not able to buy the product at their origin station via these mechanisms, we will ensure that the customer is able to board the train and buy on the train or at their destination. This is based on the pre-existing conditions of travel. Our TVMs have an 'assistance' buttons which are currently inactive, so subject to funding we will seek to enhance our TVMs by enabling the buttons for customers to use. One of the benefits of having colleagues on the concourse is that they will be readily available and close to TVMs to assist with customer enquiries, similar to what supermarkets currently have.</p> <p>We will be looking to explore these enhancements. Our TVMs have the physical capability, however, we currently do not have back office support. To have a video facility, we would need a team of people in an office somewhere to handle the calls. So for this, we would need the enablement budget as well as the extra team members. We would also need upgraded IT connectivity, as video links require greater bandwidth. Therefore, our ability to offer this will be dependant on funding.</p> <p>Our location of our TVMs were assessed as part of the our EDIA carried out before the public consultation. We have identified a number of stations where TVMs may have to be relocated to provide additional security or easier accessibility to customers. In some cases, TVMs will be need to be relocated to protect them from environmental factors.</p> <p>All our stations have TVMs with cash and card facilities, and will continue to do so if the proposals go ahead. Our stations will have one of the following: • At least one TVM that accepts cash in an accessible location • Proposals to have staff with MTIS at accessible locations (cash acceptance capability) • Agreement to pay at the destination or other locations if unable to pay by cash at time of travel if no step free access.</p> <p>SLAs vary - depending on the scenario. Most issues are repaired remotely within 2 hours. For issues that require engineer visits, it may be up to 24 hours. If parts are needed, the time will depend on the part required.</p>

	Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?	Where we propose to close a Ticket Office, we will continue to provide a reasonable adjustment to ensure that no-one has to queue to purchase a rail product for more than five minutes during times of peak demand or for more than three minutes at any other time (or any shorter period(s) specified in the Passenger's Charter). This will stay in line with the current provisions of the TSA for Regulated Stations. It is possible that there may be longer queues in the immediate period following implementation, particularly at larger stations. However, there is no intention at this time to introduce new set standards for queue times. This is because of our targeted active promotion of online purchasing and multi-skilled station staff who will have access to existing MTIS devices available at stations to help those passengers who do not, or cannot, switch. We are therefore not expecting TVMs to meet the same demand as ticket offices currently, even during peak periods.
TVM capability and availability	Can you confirm the statement that: 'the hours of operation where we have a member of staff on the station will remain the same as it is today'?	Evidence from previous Ticket Office closures, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed (typically a maximum of 20% increase in usage), this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing.
	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 to support this?	Yes, this is the basis of our proposal, the hours of operation where we have a member of staff on the station will remain the same as it is today.
	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? Will this replicate the training given to existing ticket office staff?	Our plans are to deliver the right number of stations teams to be available to offer assistance with ticket purchases at busier times. This is supported by the experience from the stations on a number of our routes (Bicester Village, Oxford Parkway) which currently operate using multi skilled team members at stations. We propose to have multi-skilled colleagues at our stations trained to the same standards as those already in similar roles at our stations; to assist customers and perform essential duties at our stations. All our station team members will be trained to enable them to carry out any duties that they require to do undertake their roles. The training of team members will be extended to provide a wider range of customer services, subject to funding.
Availability of staff to provide retail advice and help	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?	We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all our stations following the consultation process. Our station by station plans will establish central points.
	What resilience / contingency have you built into staffing plans to ensure that stations will be staffed as advertised and that 'lost hours' are minimised in future?	We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all our stations following the consultation process. Our station by station plans will establish central points.
	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?	Our stations will continue to be staffed as they are today, this has been built into our proposals and staffing levels for each station. We currently use General Purpose Relief (GPR) to provide resilience for sick leave, and holidays and will continue to provide the equivalent level of cover.
	If a person cannot pay by cash what arrangements will exist to enable them to travel, particularly where there are Driver Only Operated services? And will there be clear signage at the station to inform passengers about this?	All our TVMs at our stations are able to accept cash. We do not anticipate any issues with an increased use of cash but will review future customer purchasing behaviour and mitigate as appropriate.
Cash payments	Can you confirm that people will be able to buy the products listed in column 16 with cash?	We are currently working across the industry to develop a policy and an effective approach to enabling passengers to travel without a ticket. Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024. Staff will be issued with relevant instructions to allow passengers to travel without a ticket in certain circumstances. Until then, NRCOT provides the conditions under which a passenger may travel without incurring a penalty fare. Interim policy guidance and training will be issued to ensure that customers are able to travel under Section 6.1 NRCOT when necessary.
	Can you confirm that people will be able to buy the products listed in column 16 with cash?	Yes, customers can continue to buy the products listed in column 16 by cash in the same way as they do today, through TVMs and MTIS. MTIS will be used for any 'non standard' sales that cannot be purchased via TVMs.
Passengers requiring assistance to travel receive in a timely and reliable manner.	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 – e.g. via your existing scheme at Oxford Parkway and Bicester Village?	We are reviewing our current station staffing levels to ensure we continue to provide the same level of customer service as we do today. This forms part of the discussion we are having in our local consultation. Experience at our stations with multi-skilled colleagues shows us station teams are able to prioritise their duties to assist customer during busier times of the day.
	How will staff at the station know if passengers need help to board?	Our current Passenger Assist service will still be in place - customers will be able to request help as they do today.
	Can you confirm that there is no change in arrangements for 'turn up and go assistance for disabled passengers'?	We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all our stations following the consultation process.
	How will the central point of the ticket office/ window be replicated?	Yes, Passenger Assist services will remain as they are today. The Passenger Assist service is a new service that is available for pre-booked and walk-up customer to receive assistance. This is supported by each operator's Accessible Travel Policy that sets out the commitments to ensure an accessible railway for all passengers, including for Turn Up and Go.
Passengers, especially disabled passengers, may find it more difficult to find and get help from redeployed staff at stations.	What mechanisms will exist to monitor instances where assistance is not provided?	We are reviewing this station by station, and will work with our Accessibility Manager to ensure central points at stations are suitable for all those with special travel needs, or those who need a helping hand as identified in our EDIA.
	How will people summon help if staff are not there?	As per current arrangements through our customer relations team, customer complaints handling and feedback from our customers. We take our customer complaints very seriously and monitor the number of complaints we receive per 100,000 journeys. Where a problem with assistance is identified at a station we will work with our station teams to ensure the right level of service is available as per our stations trading hours. Where customers are at a station during trading hours and are unable to get assistance, the proposed central point will be a point of call for help.
	Will induction loop facilities be provided elsewhere on the station/concourse?	We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all types of stations following the consultation process.
Issues relating to whether passengers can get the information they require to plan and make a journey, including during periods of disruption.	How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?	We are not currently installing new induction loop facilities at stations. However, we are reviewing our stations requirements to help us understand the changes if any, each station will require. The requirements will take into consideration our station by station Equality Impact Assessments. Following the assessments, we may relocate existing induction loops if required. At very least, stations with will continue to have their existing facilities, such as induction loops, and with additional funding we will seek to enhance or improve existing facilities.
	What devices will staff have – e.g. will they be able to print journey itineraries for passengers who ask for one?	As it is today, via online, social media and customer information. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The intention would be to provide information traditionally displayed in the ticket office, including timetable leaflets, accessible travel policies. The concept of a central point will be considered across all types of stations following the consultation process.
	Will staff have the ability to print journey details for passengers?	We will also consider for each of our stations to have a visible standardised template poster at appropriate location(s) that clearly states: • What ticket buying facilities and payment methods are available (via station team members and/or TVM) • What online facilities can be accessed to buy a ticket there and then on a mobile device • What is expected of them (depending on whether the station is/is not in a Penalty Fares area and/or whether tickets are sold on train) – reinforcing the buy before you board at all relevant locations • Where they can find help Current arrangements will apply. Station teams will have printers to print tickets from the MTIS devices. We are currently able to print journey itineraries for passengers who ask for one. We will continue to provide this service as and when customers require them however, this will be dependant on station teams availability as it is now. Current arrangements will apply. The printers for the MTIS machines will be able to print journey details if requested.
Help points at stations	Are help points at every station and are they in an accessible location?	Yes, All stations have Help Points available and they are accessible to customers. We have identified in our business cases a need to upgrade and install additional help points to ensure that there is sufficient availability for those passengers who need this kind of facility.
	Are there any plans to position help points in concourse areas near ticket offices to avoid people having to walk along platforms or over bridges to summon help?	We are also reviewing our maintenance plans and back office facilities to ensure that these help point systems have near 100% availability. We are also ensuring that these help points are sited within the most accessible part of the station estate.
	What are your existing processes and SLAs for monitoring that help points are working and the response time to faults? What future commitments can you give?	This is part of the station by station planning to ascertain if/ or where help or welcome points will be needed at our stations, depending on the size and layout of the station. Any additional changes to our stations to provide new or enhanced help points will be subject to funding
	What are the standards for answering help points – i.e. within how many seconds?	Help points are checked by an independent auditor during every static SQR audit (period of every 4 weeks). If any help point is out of operation, faulty, poor reception etc. it is reported to CRCL who raise a call out with telecoms supplier (line faults) or FM (hardware) attendance is within 24 hours.
	What are the standards for monitoring how quickly you respond to passengers using the emergency button?	Standards relevant are: PRM TSI: 4.4.1, which requires 'Staff should be available to answer calls at all times that services are in operation at the station. Operators must have in place a mechanism to allow passengers to inform them when there are problems, particularly at unstaffed stations. Operators may wish to set this out when providing details of feedback mechanisms.
	How will you monitor/report time taken to answer help point calls / proportion not answered?	The SLA for Help Point responses is currently 30 seconds.
	Do you have enough resource in place to ensure that an increase in calls via help points can be answered promptly and in accordance with standards?	From a safety perspective: this would be considered as part of the station evacuation or first aid plans, and would only be available during our trading hours. Outside of these hours, fire safety would be managed remotely and with the assistance of emergency services (until our internal on-call processes starts, and we can get our on-call colleagues to attend the location).
	Is it clear how a disabled passenger would use the help-point when seeking assistance to board - e.g. would they press the information button or are they, as with some train companies, expected to press the emergency button to receive more immediate assistance?	Most of our help points are answered by National Rail Enquiries (NRE). We will continue to work with NRE as we do now to monitor the time taken to answer help point calls. This is provided as a daily breakdown of calls and the number of seconds taken for the calls to be answered - currently averaging 60 secs. The data from NRE will be used with customer feedback through our customer relations team to monitor when help points calls are answered. Where there's a problem with calls not being answered or going over 60 seconds, we'll work with NRE to identify the issues and resolve them.
		This is part of the planning we are putting in place to continue to provide a good customer service, and to continue to provide of customer safety.
		Whichever button is pressed, the customer should be able to speak to someone who can make the necessary arrangements for their assistance.
Issue relating to ensuring passengers are not penalised if they cannot buy the ticket they require from the station	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? 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?	Ticketless travel rules will still be the same, if a pre purchase ticket facility exists. Inspectors will continue to use discretion when customers have issues at TVMs or travel from unstaffed stations or only have cash from a card only machine at a station. We will ensure our teams are fully briefed and kept up to date for machine outages. This includes customers who started their journey via a different TOC. All inspectors have advanced disability training, not all are obvious and we will encourage the IAM card 'Just a minute'.
	How will you review signage to avoid sending inconsistent messages about revenue protection?	There's work across the industry to develop a policy and an effective approach to enabling passengers to travel without a ticket and not to have to go out of their way to buy a ticket. Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024. Staff will be issued with relevant instructions to allow passengers to travel without a ticket in certain circumstances, including clarification of travel in Compulsory Ticket Areas (CTAs) to ensure passengers are not unfairly penalised. NRCOT and the associated Railways (Penalty Fare) Regulations already provides the conditions under which a passenger may travel without a ticket without incurring a penalty fare. Interim policy guidance and training will be issued to ensure that customers are able to travel under Section 6.1 NRCOT when necessary. In a limited number of cases, operators will offer a 'Permit to Travel' to another location will be issued to allow travel to another station to purchase their product. This should be limited to a small range of products (not for use on the day, complex products). Such products may include in-person purchase of a railcard, annual seasons (if not mandated to digital), and rover and ranger tickets. For travel on the day or reasonably available tickets, such as weekly seasons, the customer should be handled under existing NRCOT conditions (Section 6.1)
Issues relating to whether passengers can continue to use facilities at a station.	Can you confirm that all station facilities that are currently provided during ticket office opening hours will remain open during those hours?	-
	We understand that alarms for 'disabled' toilets are often located in ticket offices. Is this the case and, if so, where will these be moved to?	Yes - this is a key component of our proposals. All station facilities that are currently provided during ticket office opening hours will remain open during those hours
	Have you liaised with the British Transport Police about the impact on staff and passenger security?	All accessible toilets (disabled toilets) should have a red pull cord - we can choose where that alarm rings to. We are considering options on how this will work in those stations where we may have lone working and also ensure a process is in place so that colleagues are not rushing safety critical duties such as dispatching but also attending to a raised alarm.
Issues relating to whether passengers feel safe at the station	Are any mitigations planned?	Yes. We liaise regularly with the BTP during our monthly routine liaison meeting. All changes have been assessed and all impacted locations will undergo a crime and vulnerability assessment.
	Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?	In addition to this, the Department for Transport (DfT) and British Transport Police (BTP) have agreed that Operators should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals once discussions with the Passenger Bodies have been finalised. This assessment was produced by DfT in collaboration with the BTP for TOCs to complete for each station and will form part of the decision-making process before any ticket office is closed.
	What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?	We recognise that antisocial behaviour and verbal assaults are key risks and are planning mitigations to help tackle these. This will include introducing further body worn cameras to our people and providing additional training on de-escalation measures and conflict avoidance.
		We are currently undertaking a survey for station CCTV, and will use the outcome of the survey to inform any further coverage that is required. Any additional CCTV requirements will be subject to funding.
		A key part of our proposal is that stations will have the same level of staff as they have today.

		<p>At present, ticket office opening hours for individual stations are stipulated in Schedule 17 of the Ticketing and Settlement Agreement (TSA). The TSA is an agreement between operators that is a condition of an operator's service contract. Whilst the TSA makes provisions for determining ticket office hours, this does not directly protect staffing levels or cover the hours of station staffing more widely.</p> <p>The TSA was brought into use in July 1995 following the introduction of operator franchises. At that time the predominate retail channel for rail rickets was via in-person retail at stations – Ticket Offices. Since then, ticket retailing has seen a fundamental shift to digital ticketing and more automated retail, with industry figures now showing that only c. 12% of tickets are now bought in-person at a Ticket Office. The protection to customers' ability to purchase tickets locally provided by the TSA is no longer as relevant given that the majority of customer now purchase online, via an App or at TVMs at stations. The expansion of Pay As You Go (PAYG) schemes including contactless and account-based payment will further erode the requirement for in-person ticket retail.</p> <p>However, a significant minority of customers, as highlighted by the initial feedback from the consultation exercise, do require assistance when travelling, either to access the services or to understand and purchase the right ticket for their journey.</p> <p>This represents a shift away from the broad Ticket Office sales provision originally intended to be protected by the TSA to a more targeted support at station for those who require assistance.</p> <p>Given that shift, the regulation required to protect the services should also be fit for purpose. With the removal of stations from Schedule 17 of the TSA, the regulation on Ticket Office staffing and services will be removed. Any future regulation should not replicate the historical Regulated Station approach of the TSA but should protect those customers most in need of in-person support and assistance. Therefore, to mitigate the concern that this will erode customer protections from future changes, it recommended that additional commitments on station staffing levels be linked to TOC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP).</p> <p>The ATP already offers better provision for the protection of passenger access to necessary and reasonable support at the station than is contained under the TSA. Unlike the TSA, the ATP is formally regulated and enforceable by the ORR as part of an operator's licence. It covers a range of scenarios to commit TOCs to providing support at stations, the most relevant of which are detailed at Appendix C to this document.</p> <p>Changes to the ATP are controlled, with the agreement of any new ATP, or change to an existing ATP, to include the provision for involvement of stakeholders regarding the ATP provisions at a local station:</p> <p>"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."</p> <p>The ORR guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies by the ORR before any new or amended ATP is approved.</p> <p>Operators may also choose to consult other stakeholders on their draft but ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC) (or Mobility and Access Committee for Scotland - MACS, as relevant for operators serving locations in Scotland), Transport Focus and (where relevant) London TravelWatch on the draft Accessible Travel Policy documents during the approval process and collate a single set of comments to feed back to the operator."</p> <p>Furthermore, the ORR guidance states that each TOC must publish ATP on their website and via hard copy at staffed stations, and the ATP must be provided to the ORR, DPTAC and Passenger Bodies.</p>
	Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?	
	How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?	<p>As is the case today, staffing hours and arrangements are advertised, for example on our websites and wider industry sites.</p> <p>We have a Passenger's Charter, which is a published guide to the level of service passengers can expect to receive when using their stations and train services. The charter is reviewed annually, including engagement with the Passenger Bodies (Transport Focus and London TravelWatch) and includes a description of all aspects of the expected services a passenger should expect, including purchase of tickets and support at stations.</p> <p>The production of the charter is a requirement for each operator under their contract with the DfT. It should provide a simple and clear description of the expected services. The Charter ensures that each operator will continue to communicate the services and availability of those services at stations that are no longer Regulated Stations under Schedule 17, as it does today.</p>
	How will compliance with any agreed new hours be monitored and reported?	<p>As per our proposal, our hours of station operations will remain unchanged.</p> <p>With the removal of stations from Schedule 17 of the TSA, the regulation on Ticket Office staffing and services will be removed. The intention going forward would not be to replicate the historical regulation of station staffing hours but should protect those customers most in need of in-person support and assistance. Therefore, to mitigate the concern that this will erode customer protections from future changes, it has been recommended that additional commitments on station staffing levels be linked to TOC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP).</p> <p>The ATP already offers better provision for the protection of passenger access to necessary and reasonable support at the station than is contained under the TSA.</p> <p>The ORR guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies by the ORR before any new or amended ATP is approved.</p> <p>Operators may also choose to consult other stakeholders on their draft but ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC) (or Mobility and Access Committee for Scotland - MACS, as relevant for operators serving locations in Scotland), Transport Focus and (where relevant) London TravelWatch on the draft Accessible Travel Policy documents during the approval process and collate a single set of comments to feed back to the operator.</p>
Future changes	What arrangements have been made to provide staff cover for things like sickness and holiday?	Cover for colleague sickness and holidays will be provided as it is today. All our stations have GPRs (will be written in full) to cover colleague sickness and holidays.
Timing of mitigations	What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?	In many instances, we expect there will be two stages of mitigation. The "Day 1" mitigations (in place for the day a ticket office closes) may be an interim measure to manage the transition until a longer-term solution can be implemented. These longer-term solutions will have already been planned and approved/contracted, in development and are just waiting for delivery. 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.
	Is there any reason that Transport Focus should not object to the change until the mitigations have implemented and can be demonstrated to be adequate?	There is no reason that Transport Focus 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.
	Has any necessary funding / agreement been secured to implement any mitigations?	The Rail Delivery Group has agreed in principle with the Department for Transport that funding support for the Retail Enhancements will be available, but the release of this funding will obviously be subject to the conclusion of the consultation process and the ticket office closure plan going ahead. In his letter to the Chair of the Transport Select Committee, dated 11 September 2023, the Minister of State for Transport, Huw Merriman MP, has confirmed that no final decisions will be made until after the consultations have been concluded. He states, "Through the RDG TOC to TOC consultation process. We do not have any National Rail managed stations."
Liaison with other operators	What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes? Have any discussions been had with Network Rail about the impact at NR managed stations?	
Easy and widespread availability of tickets	Where passengers can buy their tickets from a Ticket Vending Machine (TVM), we have questions about their ability to meet the retail capacity needed if ticket offices close, particularly at stations where ticket office sales are relatively high (such as London Marylebone). This presents the risk of customers facing significant queues to purchase tickets, increasing instances of missed trains or boarding without a ticket.	We will continue to ensure that no-one has to queue at to purchase a rail product for more than five minutes during times of peak demand or for more than three minutes at any other time (or any shorter period(s) specified in the Passenger's Charter). This will stay in line with the current provisions of the TSA for Regulated Stations. It is possible that there may be longer queues in the immediate period following implementation, particularly at larger stations. However, there is no intention at this time to introduce new set standards for queue times. This is because of our targeted active promotion of online purchasing and multi-skilled station staff who will have access to MTIS devices available at stations to help those passengers who do not, or cannot, switch. We are therefore not expecting TVMs to need to meet the same demand as ticket offices currently, even during peak periods.
	TVMs are not accessible to all passengers. For example, they may not be at the right height for wheelchair users, and we have had concerns from the visually impaired and blind community that touch screens are inaccessible.	Subject to funding we will be relocating TVMs where they are not accessible to customers including those with disabilities and where the environment is not suitable for their efficient use. Acknowledging that it is often difficult and sometimes impossible for people with visual impairments to use TVM to purchase tickets, We have an alternative option is the customer is able to pay online. This would mean the customer can purchase their ticket through our Website which has an accessibility tool featuring a screen reader option along with options for other disabilities.
	Many responses from the public noted that they find TVMs generally difficult to use, for example they can be slow and confusing to navigate. If poorly located this can also make them harder to use, for example if glare from sunlight makes the screens difficult to read. Others noted that it is not uncommon for TVMs to be out of order, which can result in longer queues at the remaining TVMs or even an inability to buy a ticket at all.	That said, if the customer is not comfortable with online transactions and wants to use cash then as set out in E87 below and in line with our Accessible Travel Policy (ATP) we advise customers of the following:- "If you are unable to buy a ticket before you board one of our trains, you can buy one without penalty on the train or at the destination station. You will still be able to use your Disabled Persons Railcard or receive the relevant discounts."
Retail staff support	A significant number of public responses noted they find the fares system complex and confusing, and they are often unsure of what ticket to buy. In contrast to many other self-service retail situations, many passengers will need support not just to use the TVM but also to understand the most appropriate ticket to purchase when faced with multiple ticketing options for the same journeys. While we understand under your proposals staff at stations will be able to help people buy the right tickets at TVMs (where available), there are questions about whether they will have sufficient expertise to navigate the complex fares system.	Our station colleagues will be on hand to provide assistance and expertise where required to ensure customers are able to purchase the tickets they need at the same times they are today.
	Given the issues with the usability and accessibility of TVMs, if staff assistance to purchase a ticket from a TVM is not available it will be harder for passengers, particularly Disabled passengers, to purchase a ticket before they board.	As set out in our Accessible Travel Policy, Elderly and Disabled passengers can purchase a ticket on-board or at their destination station without penalty if they were unable to use the TVM. They will also be able to get the associated discount if they have a disabled persons railcard. Our ATP States "If you are unable to buy a ticket before you board one of our trains, you can buy one without penalty on the train or at the destination station. You will still be able to use your Disabled Persons Railcard or receive the relevant discounts."
London Travel Watch	Station staff are a vital way in which many passengers receive assistance when travelling. This is not just with regards to buying tickets, but also providing further assistance, information and advice, support during disruption, and improving safety and security. However, we are concerned that under your proposals staff availability will be reduced. While we note that your proposals mean that you will continue to have staff at stations during the hours of operation of the current ticket offices, there are some reductions in the number of staff available, and presumably in turn their capacity. For example, High Wycombe station is currently staffed by 11 members of staff - 7 sales and 4 general station hosts - plus 3 members of external security 24/7. Under these proposals, the station staff will be reduced to 9 members of staff – all multi-skilled customer service agents – plus the 3 members of external security. There are questions about whether there will be enough capacity to meet all passengers' needs at stations with reduced staff numbers, particularly as they will be in multi-skilled roles, not just retail. There is a risk they may be stretched too thinly to meet passengers' needs. At stations where overall staff presence has been reduced disabled passengers' ability to 'turn up and go' may be impacted if they are unable to respond as quickly.	We will maintain sufficient staffing levels to ensure customers received the same customer service as they do today. This is being discussed as part of our local consultation process. Staffing levels are subject to local consultation, however, we will be training our staff to be multi-skilled and be proficient to provide the level of customer service needed at each station.
	How they will be able to locate redeployed staff at stations – while in theory they may be more visible outside of the ticket office, in reality they may be harder to find. At present, passengers have a clear focal point when looking for help from staff in the form of the ticket office.	We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point is being considered across all stations following the consultation process. During staffed hours this location would have a member/members of staff nearby to offer advice and support. We expect the number of passengers that can be supported at any one time will mirror the number of staff available. While the primary role of the central point is to offer support and guidance to customer to use the station facilities, such as TVMs, where possible, any member of staff will have access to an MTIS device to retail tickets as necessary. Out of staffed hours these locations could also offer access to a 'Help Point' and additional guidance and information. These central point would be clearly accessible / visible from the station entrance and close to any ticket retailing facilities where appropriate.
	Providing assistance to travel in a timely and reliable manner	Our station teams will continue to offer the level of assistance we provide for Elderly and Disabled Customers to include: • Help with planning your journey • Assistance with getting on and off the train • Boarding or alighting with wheelchairs, scooters, and mobility aids • Assistance with getting around the station, including to and between platforms • Assistance to and from connecting services and onward transport within the station area • Purchasing travel tickets • Making seat reservations and booking dedicated spaces on services operated by other train operators • Checking the facilities available and accessibility for trains and stations at each stage of your journey • Help with luggage. Our station teams are trained to assist passengers with both visible and non-visible disabilities, as well as vulnerable customers. We can not accompany customers throughout your journey or provide personal care, such as help with eating, taking medication or using the toilet. Where customers need this sort of help, they should travel with a companion/helper. For safety reasons, our colleagues are unable to lift customers from a wheelchair into a seat on the train, but they are able to assist with transfer of and on our trains. During staff hours a station would have a member/members of staff nearby to offer advice and support. We expect the number of passengers that can be supported at any one time will mirror the number of staff available. While the primary role of the central point is to offer support and guidance to customer to use the station facilities, such as TVMs, where possible, any member of staff will have access to an MTIS device to retail tickets as necessary. Out of staffed hours these locations could also offer access to a 'Help Point' and additional guidance and information. These central points will be clearly accessible / visible from the station entrance and close to any ticket retailing facilities where appropriate.
	There should also be a simple way for people to know the order in which they will get assistance in the absence of a queuing system to provide clarity and assurance they will be helped, and avoid potential conflict. This is particularly important during disruption.	If Customers are unable to board a train at a station that is unstaffed or outside the hours of a partially staffed station then our Passenger Assistance Team, Customer Relations and or Control Team can organise alternative transport to the nearest staffed station where the customer can continue their journey as planned.
	where tickets cannot be bought at a station, the station will update the rest of the route to expect passengers without tickets", and that passengers can then purchase tickets at their end destination. Given this, it is important that passengers are made aware that they can board their train without a ticket if they cannot buy the ticket they need from the station. Additionally, signage at stations must not send contradictory messages. For example, penalty fare notices stating passengers are required to have a ticket before	We will raise awareness using existing channels to include; social media, website, customer information leaflets and, station announcements (as appropriate). We are working with our revenue protection teams to agree how passengers without tickets should be advised.