

31 October 2023

██████████
Chiltern Railways

(sent via e-mail)

Dear ██████████

Chiltern Railways Proposals to close ticket offices under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing to you following Chiltern's letter of 5 July to London TravelWatch, setting out plans to close ticket offices at stations as part of a wider programme of industry reform.

The proposed changes relating to 14 stations 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 letter of 27 September in response to ours of 6 September (attached in Annex 1 and 2 respectively) 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 Chiltern and eight other operators in our area. The extended public consultation period closed on 1 September and during that time London TravelWatch received 232,795 responses in total. 9,765 of these responses were specific to Chiltern. 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 Chiltern stations are as follows:

- closure of all ticket office counters at 14 Chiltern stations within the London TravelWatch geographical remit
- these stations are to follow the Bicester Village and Oxford Parkway station model, with teams on hand to assist with ticket purchases using hand-held Mobile Ticket Issuing Systems (MTIS) in cases where customers are unable to use on-site Ticket Vending Machines (TVMs)
- redeployment of Chiltern ticket office staff roles, so that a range of customer services are provided through new roles, primarily located in the main TVM area of the station

- replacing ticket sales at Chiltern ticket office counters with a combination of increased online sales, purchases made via the existing TVMs managed by Chiltern, and sales made by Chiltern staff using MTIS devices.

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 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 generally 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.

Chiltern received 9,765 responses specific to their stations. Of these 9,735 were objecting to the proposals. Objections were received for all 14 of the stations Chiltern put forward proposals for. We also received one station specific petition for High Wycombe with 395 signatures. A station-by-station breakdown can be found in Appendix 1.

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

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

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 Chiltern's proposals could be good for passengers. In principle, we support the more flexible use of staff to better help passengers at stations. By making staff more visible and accessible, it should drive higher rates of customer satisfaction and lower the costs of selling tickets to support a more financially sustainable railway for the future. This approach is particularly sensible for stations which are now seeing low sales at their ticket offices.

However, the key question for London TravelWatch to consider is whether the detail and supporting evidence provided is strong and robust enough to give us the reassurance that we need that an improvement in passenger experience will begin as soon as Southeastern's proposals are 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. We understand that the plans to close the Chiltern ticket offices do not mean a reduction in station staffing hours. Additionally, 9 stations would see no change in the numbers of staff. However, 5 stations would have fewer staff under the proposals. We are particularly concerned by reductions to roles most likely to interact with the public, including Sales Station Hosts and Station Hosts.

- Sales Station Host and Station Host numbers will fall at Aylesbury (from 3 to 2, a 33% decrease), Beaconsfield (from 3.5 to 2.5, a 29% decrease), High Wycombe (from 11 to 9, an 18% decrease). The reduction may be small in number but high as a proportion to the current number of staff. We do not think this would result in an improvement to quality of service and may decrease it
- Customer Experience Ambassadors, Supervisors and Managers at London Marylebone will decrease from 24 to 20 (a 17% decrease). This is particularly concerning given the high annual footfall and ticket office sales, and the number of people who are more likely to need help, such as tourists, who use it. Again, we do not think this would result in an improvement to quality of service and may decrease it
- at Bicester North staff levels would remain the same at weekends, but the number of Sales Station Hosts and Station Hosts will reduce from 3.5 to 2.5 Monday to Friday. However, given ticket sales are higher on Saturdays, when the station is already operating with 3.5 staff, than on weekdays, we think this is unlikely to have a detrimental impact on passengers, so would not object on this basis.

The proposals aim to improve service quality through a more visible staff presence at stations, particularly near Chiltern TVMs currently located in ticket office halls. Staff 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.

In terms of staffing levels, Chiltern say that the hours of operation will remain the same as today, and that Chiltern plans to deliver the appropriate number of teams to be available to offer assistance with ticket purchases at busier times. This would be based on the concept of having multi-skilled team members at stations, as is currently the case at Bicester Village and Oxford Parkway.

We understand that multi-skilled colleagues will be trained to the same standards as those already in similar roles - to assist customers and perform other essential duties. We also note that General Purpose Relief (GPR) staff have been built into plans to provide resilience for sick leave and holidays to provide the required level of cover at all times.

However, an area that we are concerned about is that in future passengers would not have the same opportunity to scrutinise and comment on potential further changes to staffing levels as they do today. This is because the TSA process would not apply in a situation where there are no longer ticket offices at Chiltern stations.

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 Chiltern can determine alone, but until it is in place we object to the proposals to close the ticket offices at Chiltern stations.

Access to products

Our focus in this category is on how far Chiltern's proposed combination of TVM capacity/capability and staff support at stations would, alongside other sales channels, ensure continued widespread and easy access to the purchase of rail products. This is especially pertinent for those stations, such as London Marylebone, where ticket office sales remain relatively high (and indeed well above the previous threshold for ticket office closures of 12 tickets per hour).

In Chiltern's Equality Impact Assessment (EqIA) some customers were identified as being affected by a move towards more digital service and ticketing. We are therefore reassured that staff will continue to be able to sell all tickets from the stations from Mobile Ticket Issuing Systems (MTIS), which will also facilitate cash payment at all stations (alongside TVMs which accept cash). They can also be used by staff members to 'queue bust' at busier times. Plans to upgrade TVMs so they can sell more tickets per hour is also welcome. We know this would likely not happen until mid to late 2024, depending on funding and contracts. We would want to see the upgrades in place *before* any major changes took place.

Chiltern have said that additional assessments of whether TVMs will be able to cope with the extra demand as passengers shift ticket purchases from offices to machines will not be carried out, as MTIS devices are being retained at all locations and no significant changes to demand of existing ticket sales is expected. If these assumptions are not correct and in practice TVMs do not have enough capacity at stations, particularly during peak hours, it may result in unacceptable queuing times for passengers and in turn higher likelihood of missed trains. Chiltern has said it 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", in line with the current provisions of the TSA for Regulated Stations. However, Chiltern does not intend to introduce a new set of standards for queuing times, and acknowledges that "there may be longer queues in the immediate period following implementation, particularly at larger stations."

A commitment to a queuing time metric would help address our uncertainty as to whether stations would have enough retail capacity under these proposals. A robust metric and reporting regime (based on the existing standards at ticket office windows) would create a review mechanism that would trigger action (such as issuing more hand-held ticket devices for staff to sell tickets with) if projections are wrong and queues exceed targets.



We have a further concern related to the objective of encouraging further migration of sales to online channels. National Rail Enquiries and train operators (TOC) websites for some time have mis-represented many national rail fares in the London area by displaying them as the “cheapest fare” for a rail journey, when there is often a cheaper (but less prominently-displayed) rail option via TfL Oyster or Contactless payment.

Consequently, encouraging more people to buy tickets online, as envisaged under the ticket office closure proposals, currently risks directing more passengers to more expensive fares than they need to pay. London TravelWatch have raised this concern with RDG, but despite some encouraging signals, there is as yet no agreed “fix” nor a firm timescale for introducing it. A solution needs to be put in place successfully before London TravelWatch can support Chiltern’s proposed changes.

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.

Passenger Assist and Turn Up and Go services are of particular interest. We note that in the latest ORR survey of experiences of Passenger Assist (July 2023), Chiltern passengers were more likely than the overall sample to state that they weren’t met or received the Passenger Assist service they booked. Chiltern plans state that sufficient staffing levels will be in place to ensure customers receive the same service as they do today. What’s more, they will provide a ‘consistent and common location’ at stations to offer reassurance to those who need it. In other words, a clear and obvious place to get help and support. It is also reassuring that station teams are trained to assist passengers with both visible and non-visible disabilities, as well as vulnerable customers.

However, we question if this will truly be an improvement at stations where staff numbers are being reduced, as overall there will be less staff available to provide help. With multi-skilled roles, while again providing more flexibility, it is important to make sure there are sufficient staff levels to still complete required tasks - a staff member may for example be needed to help sell a ticket at the same time another passenger may need assistance getting to a platform. Where there are fewer staff doing the same roles, this will be more difficult to achieve.

We note that improvements to TVMs in terms of relocating them so they are more secure, accessible and sheltered from the weather will take time and are dependent on funding. Buttons for ‘assistance’ on TVMs remain subject to funding and general stations improvements such as induction loops and help points are ongoing pieces of work. These are important mitigations that would need to be in place before any ticket offices could be closed.

We think it is positive that Chiltern have proposed that all stations will have a clearly identified central point, and 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, such as a mechanism for alerting staff that someone is at the welcome point and needs assistance, whether induction loops would be fitted, clarity over what support will be provided to passengers and whether the welcome points will be fixed. The RDG's letter of 11 October sought to address these points but it is clear that there is still no real certainty for passengers on what would be provided.

We are also very conscious that Welcome Points were not explained as part of the consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with Disabled people and representative groups to secure their endorsement on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and how passenger feedback on them. Our approval of the proposals on ticket offices would need to await the outcome of these pilots.

Safety

We welcome the discussions which Chiltern have held with the British Transport Police (BTP) about the safety and security aspects of the proposals to close ticket offices. 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.

Without full and supportive assessments of the new plans from BTP, it will be difficult to accept the threshold around safety and security has been met.

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.

Chiltern has identified customer satisfaction surveys (and their recent scores), social media monitoring and feedback via customer relation teams as a key way to monitor future performance.

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 Transport Focus. As that survey was paused in 2020 due to Covid, 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 Chiltern 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 Chiltern'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. Chiltern has explained to us that a 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, they 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 Chiltern based on the following reasons:

- we are unable to conclude that the proposals would result in an improvement to the quality of service:
 - we are particularly concerned that the reduced staff levels at Aylesbury, Beaconsfield, High Wycombe and London Marylebone could result in a worsening in quality of service

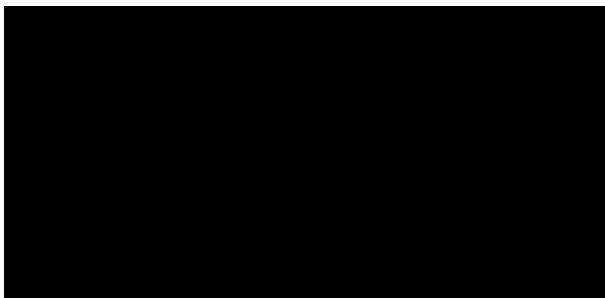


- agreement has not yet been reached with the rail industry on how passengers' interests might best be represented in future, should proposals be brought forward for further staff reductions after the current ticket offices are closed
- improvements to TVMs, while welcome, are still in development and contingent on funding
- the continued mis-representation of London rail fares on National Rail Enquiries and TOC websites has not yet been properly resolved
- Chiltern, working the other operators, needs to secure the endorsement of DPTAC, Disabled people and representative groups on the concept, design and implementation of Welcome Points
- 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 Chiltern 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, Chiltern 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,



[Redacted]
[Redacted]
London TravelWatch



Appendix 1 - A list of objections and petitions by station

Station	Number of Objections	Number of Petitions and Signatures
Aylesbury	53	
Aylesbury Vale Parkway	3	
Beaconsfield	57	
Bicester North	50	
Denham	9	
Gerrards Cross	84	
Great Missenden	77	
Haddenham & Thame Parkway	46	
High Wycombe	101	1 petition with 395 signatures
London Marylebone	81	
Princes Risborough	51	
Seer Green & Jordans	4	
Stoke Mandeville	21	
Wendover	51	

