Clarification Questions Raised by London Travel Watch & Greater Anglia Responses

#	London Travel Watch Questions	Greater Anglia (GA) Response
	Easy and widespread availability of tickets Adequacy of retail facilities	
1	Do you have any evidence showing how many / what proportion of people will move to digital if ticket offices are closed?	Please see response as Evidence No 1
2	Have you assessed who will not / cannot move to digital and the effect on them of closing the ticket office?	Yes, we have completed Equality Impact Assessments for all stations that are in scope for ticket office closure on our network to assess the impact against people with protected characteristics (defined by the Equality Act 2010). Research into digital exclusion (e.g. Office of National Statistics - Exploring the UK's digital divide' - March 2019) reveals that whilst the number of non-internet users has been declining over the last decade, there remains a proportion of people who cannot or will not move to digital. We know that older citizens and those with a disability are more likely to be amongst those groups. The EqIAs consider this and set out the following in mitigations:
		Proposed on site, static, rostered staffing is directly aligned with periods of peak customer demand to support customers who may need assistance to buy a ticket. Outside of static hours, there are ticket machines at every station that conform to DfT's 'Design Standards for Accessible Stations'.
		Our ticket machines also have Virtual Ticket Assistance (VITA) — which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them. In addition, our Accessible Travel Policy commits to a customer being able to board a train without a ticket if the ticket machine is inaccessible to them. Customers can then buy a ticket onboard (if available via a conductor or revenue protection officer) or at their destination station without a penalty. This is an ORR requirement. This is also referenced as an acceptable mitigation in the National Technical Specification Notice – Persons with Reduced Mobility (January 2021) (Section 4.4.1 – Infrastructure Subsystem) and the National Rail Conditions of Travel (6.1.3.3).
		However, after reviewing the initial feedback that you have sent, we have also reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. As a result, most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will be available to assist customers with ticket purchasing for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours.
3	Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?	Please see response as Evidence no 1
4	What reassurance and evidence can you give 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 stations with a higher than average proportion of sales from the ticket office?	GA have overlayed the number of tickets retailed through the both ticket office and on ticket machines, using 15 minute time bands, to highlight if the number of ticket machines is sufficient at each station (see Evidence No 2). This assessment has taken the busiest hour of ticket sales during the six week period of data provided, both from the ticket office and the ticket machine, and assumed a deliberately low and conservative 15% conversion rate onto on line channels (previous evidence suggests the actual switchover to online channels would be much higher, but it was felt appropriate to use a more cautious rate in preparing our plans). Analysis of this data has shown that additional ticket machines would be required at some locations. See Appendix A which sets out station specific mitigations, including if an additional ticket machine will be installed (subject to business case approval).
	Has any assessment of the TVM capacity at each station has been carried out? This is 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?	Yes, GA have overlayed the number of tickets retailed through both ticket offices and on ticket machines, using 15 minute time bands, to highlight if the number of ticket machines is sufficient at each station (see Evidence No 2). This assessment has taken the busiest hour of ticket sales during the six week period of data provided, both from the ticket office and the ticket machine, and assumed a deliberately low and conservative 15% conversion rate onto on line channels (previous evidence suggests the actual switchover to online channels would be much higher, but it was felt appropriate to use a more cautious rate in preparing our plans). Analysis of this data has shown that additional ticket machines would be required at some locations. See Appendix A which sets out station specific mitigations, including if an additional ticket machine will be installed (subject to business case approval).
		To further support the anticipated increase in ticket issues on ticket machines, GA is trialling a plain paper print roll ticketing solution on 38 ticket machines, between November 2023 and January 2024, which will see barcode tickets being issued from ticket machines for the majority of tickets resulting in quicker ticket printing time. GA plans to roll out this technology to all of the 188 compatible ticket machines at staffed stations between April and July 2024 (subject to funding approval).
6	Will there be standards for maximum queuing times at TVMs and how will queue lengths be	GA will use reasonable endeavours to ensure we minimise queuing times at ticket machines.
	monitored?	Feedback will be actively sought from colleagues on any build up of queues. Local and senior managers are also constantly monitoring ticket purchasing trends across the network at busier times of the day and will also be observing any emerging issues as part of their roles, as well as assessing if any further actions are necessary.
		GA have overlayed the number of tickets retailed through both ticket offices and on ticket machines, using 15 minute time bands, to highlight if the number of ticket machines is sufficient at each station (see Evidence No 2). This assessment has taken the busiest hour of ticket sales during the six week period of data provided both from the ticket office and the ticket machine and assumed a 15% conversion onto on line channels (previous evidence suggests the actual switchover to online channels would be much higher, but it was felt appropriate to use a more cautious rate in preparing our plans). Analysis of this data has shown that additional ticket machines will be required at some locations and therefore alleviating the queuing times. See Appendix A which sets out station specific mitigations including if an additional ticket machine will be installed (subject to business case approval).
		Customers are able to provide on the spot feedback to GA directly through its new in house customer satisfaction survey ("We're all Ears"). Feedback is regularly reviewed with underlying data trends discussed and acted upon.
7	What mitigations do you intend to put in place to help staff 'queue bust' at busy times?	Support will be provided to customers by colleagues at the stations in using online ticket buying facilities or by providing support at a ticket machine. The multi-skilled host will be able to quickly assist customers who need help at the ticket machine during busy times, reducing any queuing time that may occur.
		Our ticket machines also have Virtual Ticket Assistance (VITA) — which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them.
		GA have overlayed the number of tickets retailed through the both ticket office and on ticket machines, using 15 minute time bands, to highlight if the number of ticket machines is sufficient at each station (see Evidence No 2). This assessment has taken the busiest hour of ticket sales during the six week period of data provided, both from the ticket office and the ticket machine, and assumed a deliberately low and conservative 15% conversion rate onto on line channels (previous evidence suggests the actual switchover to online channels would be much higher, but it was felt appropriate to use a more cautious rate in preparing our plans). Analysis of this data has shown that additional ticket machines would be required at some locations, therefore alleviating any queues that may occur. See Appendix A which sets out station specific mitigations including if an additional TVM will be installed (subject to business case approval).
	How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?	Feedback will be actively sought from colleagues on the adequacy of retail facilities. Local and senior managers are also constantly monitoring ticket purchasing trends across the network at busier times of the day and will also be observing any emerging issues as part of their roles, as well as assessing if any further actions are necessary.
		The Ticketing and Staffing section of the Service Quality Regime (SQR) also includes specific criteria relating to the availability and full functionality of ticket vending facilities, help points and colleague presence (where it is expected and scheduled to be). The results of these third party audits are reportable to customers via the website on a periodic basis.
		In addition, GA has recently launched a new customer satisfaction survey (We're All Ears) where customers can directly give us feedback. This survey — with a mixture of quantitative and qualitative questions — includes a specific section on the retailing proposition at the station. The results and the verbatim feedback from this survey are regularly reviewed and analysed by the Customer Experience Team before being discussed internally with colleagues throughout the business on a periodic basis, to assess whether any improvement actions or interventions are needed. By enabling us to understand any specific issues (as well as more general trends) relating to customer satisfaction right across the network, it provides customer-focused evidence to ensure we are respond to any emerging concerns or issues.
		From Spring 2024, a new, independent, national Rail Customer Experience Survey is expected to be launched which will measure all parts of the customer journey and provide granular detail on customer satisfaction on a station by station basis - providing another source of feedback on retailing issues.

9	What impact is there on impartial retail obligations – something that currently applies to ticket	There is no impact on our impartial retail obligations. As set out in the Ticketing & Settlement Agreement we will continue, as we do today, to comply with the
	offices. Will similar obligations be put onto other channels?	impartiality obligation across all our retail channels.
		Our ticket machines currently offer tickets for all available routes and our multi-skilled hosts, if required, will be available to ensure a customer purchases the required ticket for their journey based on their individual choices and needs.
		If a customer is purchasing a ticket online the available journey times, prices and operator are all displayed, so they have all the relevant options available to make the right choice for them.
10	Usability, functionality and accessibility of Ticket Vending Machines (TVMs) Which products are not available from your TVMs? This should include not only tickets but also	Please see response as Evidence No 3
	things like reservations, concessions and discounts, tickets for travel that do not involve the 'host' station, use of vouchers and warrants, and tickets for connecting services (e.g. Plus Bus tickets).	
11	How will passengers access products and services not available at the station in future?	The overall mitigation approach is predicated on a 'Digital First' approach to ticketing, with the promotion and use of digital ticketing and services as the primary retail channel.
		We have set out in our response to question 10 the intentions for the retailing of products that are current not available on the ticket machine.
		Where time is required to implement changes due to ticket machine upgrades or other process changes, to facilitate earlier implementation of the proposals, interim workarounds may be necessary and follow a standard hierarchy of mitigation: 1. Direct online (website or App) - Remote from station. 2. Telesales functionality or Travel Agent - Remote from station. 3. TVM - At station. 4. Mobile Ticketing Issuing System (from an on-board conductor on all those routes where on-train conductors are currently available) 5. Customer Information Centre - At station.
12	Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?	Yes, GA's ticket machine supplier has a development roadmap for a new customer interface on our ticket machines which will simplify the buying process for customers. The base plan includes a target date of June 2024 for this improved functionality to be available.
		GA is also trialling a plain paper print roll ticketing solution on 38 ticket machines, between November 2023 and January 2024, which will see barcode tickets being issued from ticket machines for the majority of tickets resulting in quicker ticket printing time. GA plans to roll out this technology to all 188 compatible ticket machines at staffed stations between April and July 2024 (subject to funding approval).
		GA is also working with RDG and the industry to identify the functionality needed to provide further mitigations for those products not currently available from ticket machines. Please refer to question 10 which detail the list of products not currently available on ticket machines and the retail channels from which they are available. Most of the approaches for enhancements to ticket machines require engagement with the ticket machine suppliers and development activity. Initial estimates for the development time required for specific products has been set out in our response to question 10. In most cases these changes are not planned to be completed until mid- to late-2024. Final plans will be dependent on funding agreements and supplier contracts.
13	Will staff be able to access a ticket machine, or be issued with handheld machines to sell tickets not available from the TVM? If so, what reassurance can you offer that you will retain this option?	There are no plans to issue station staff with handheld ticket machines and it is worth noting that our handheld ticket machines do not offer the full range of tickets. Support will be provided to customers in accessing the full range of tickets types by colleagues at the station. Our multi-skilled hosts will advise customers on how a full range of tickets can be purchased via on line channels, via a ticket machine, via a conductor (on all those routes where on-train conductors are currently available), via telesales or at Customer Information Centres. Colleagues would also be provided with mobile devices (tablets) in assisting customers (subject to business case approval). Please note only 1.94% (1.59% if priv tickets are not included) of tickets sold through a ticket office (including our proposed Customer Information Centres) from the six week data provided were tickets that currently can not be purchased via a ticket machine at the station.
		GA is also working with RDG and the industry to identify the functionality needed to provide further mitigations for those products not currently available from ticket machines. Please refer to question 10 which detail the list of products not currently available on ticket machines and the retail channels from which they are available. Most of the approaches for enhancements to ticket machine require engagement with the ticket machine suppliers and development activity. Initial estimates for the development time required for specific products has been set out in our response to question 10. In most cases these changes are not planned to be completed until mid- to late-2024. Final plans will be dependent on funding agreements and supplier contracts.
14	How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets.	GA has no plans to withdraw any of the product range that it currently offers. This is evidenced by the positive steps being taken to provide alternative purchase channels for that very small proportion of products that are currently not available on ticket machines. GA seeks to match its product range to the prevailing market and where customer demand exists, and is continually monitoring its product offering and associated demand. GA would not be able to remove any product without prior approval from the DfT.
		The industry may be simplifying processes, such as removing photocard requirements for season tickets, but withdrawal of products would require a full and formal review of the ticketing and fares system. That approach is not within the remit of this consultation or these proposals.
15	How will disabled people who cannot use a TVM purchase a ticket?	Our proposed multi-skilled hosts' presence at stations, is aligned with periods of peak customer demand to support customers who may need assistance to buy a ticket. These hosts will be positioned at designated welcome / assistance points (subject to business case approval) in which the default position will be as close as possible to the ticket machines (positioning will be reviewed on a station by station basis with input from our Accessibility Panel). 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. Please see Evidence No 4 for an example of a welcome / assistance point at one of our stations.
		Our ticket machines also have Virtual Ticket Assistance (ViTA) – which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them.
		In addition, our Accessible Travel Policy commits to a customer being able to board the train without a ticket if the ticket machine is inaccessible to them. Customers can then buy a ticket onboard (from a conductor, if available) or at their destination station without a penalty. This is an ORR requirement. This is also referenced as an acceptable mitigation in the National Technical Specification Notice – Persons with Reduced Mobility (January 2021) (Section 4.4.1 – Infrastructure Subsystem) and the Nation+B30al Rail Conditions of Travel (6.1.3.3).
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see <u>no change in the staffing hours</u> and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will be available to assist customers with ticket purchasing for the same hours as today. Please refer to <u>Appendix A</u> which sets out individual station specific mitigations including an update to our proposed station staffing hours.
16	Is it proposed to upgrade TVMs to offer remote access/video help facilities?	Our ticket machines have Virtual Ticket Assistance (VITA) – which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them.
17	Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability in different weather conditions?	Yes. GA has reviewed the accessibility and useability of existing ticket machines. Ticket machines are located in the optimal positions on stations so customers can easily find them using clear wayfinding signage. Ticket machines are located in accessible positions and take into account the peak demand at the station. Further considerations such as sun glare, visibility from a safety and security perspective and the requirements for shelters are also taken into account.
		Our ticket machine supplier has confirmed that the ticket machines at GA stations conform to DfT's 'Design Standards for Accessible Stations'.
		However, we've identified a very small number of ticket machines where there would be benefits from relocating them (if funding were available).
18	What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs? Please answer in relation to replenishing consumables i.e. ticket stock	GA has a robust Service Level Agreement with our supplier to maintain ticket machines, with specific respond and fix times to resolve faults. GA has a buisness plan commitment to meet this Service Level Agreement with the supplier. GA is currently reviewing this SLA with our supplier to reflect expected future useage.
	Tuture importance of TVMs? Please answer in relation to replemishing consumables i.e. ticket stock and ink, and repairs to faults.	Commitment to meet this service Level Agreement with the supplier. GA is currently reviewing this SLA with our supplier to reliect expected future useage. Multi-skilled hosts will continue to replenish ticket machines of ticket stock and perform basic maintenance for immediate fault remedy. GA have internal field engineers who monitor the availability of our ticket machines and respond to any faults that may occur. GA is also looking at the feasibility of increasing the number of GA field engineers (subject to funding).

19	What should passengers do if they cannot find the ticket they need on a TVM and no staff are available to help?	Support will be provided to customers in accessing the full range of ticket types by colleagues at the station. Our multi-skilled hosts will advise customers on how a ful range of tickets can be purchased via online channels, via a ticket machine, via a conductor (on all those routes where on-train conductors are currently available), via telesales or at Customer Information Centres. Colleagues would also be provided with mobile devices (tablets) in assisting customers (subject to business case approval). Please note only 1.94% (1.59% if priv tickets are not included) of tickets sold through a ticket office (including our proposed Customer Information Centres
		from the six-week data provided were tickets that currently cannot be purchased via a ticket machine at the station. After reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore, staff will continue to be available at stations to provide assistance to customers with regards to ticketing enquiries for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. This will also be supported by our mobile teams.
		Our ticket machines have Virtual Ticket Assistance (ViTA) – which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them.
	Retail Staff Support	
	New will people summon a member of staff if they need help while using a TVM (i.e.the equivalent of the 'red light' at a supermarket self-checkout till)?	Our multi skilled hosts will be positioned at designated welcome / assistance points (subject to business case approval) in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis with input from our accessibility panel). A 'Welcome Point / assistance 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 an common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. If assistance is required customers will be able to ask for this support. Please see Evidence No 4 for an example of a welcome / assistance point at one of our stations. At stations where there is one colleague on duty and they are called away to assist a customer on another part of the station, as they could be today from a ticket office, the colleague will return to the area of the welcome point / assitance point once this is assistance is provided.
		Our ticket machines also have Virtual Ticket Assistance (ViTA) – which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them.
21	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 / assessments to support this?	The rationale for determining the staffing at stations, was based on the peak customer demand at the station, assistance requests, the number of ticket sales at a station, either via the current ticket office or ticket machine, and the removal of certain duties from colleagues at some stations. The consolidation of former platform duties and ticket office duties will result in an adequate number of staff to assist customers.
		At busier stations the number of colleagues assigned to assist customers with ticket purchases and at the ticket machines has been determined based on the number of ticket sales at that station (both via the ticket office and ticket machine). For example the proposal at Bishop's Stortford station is for 3 multi-skilled hosts to be assigned to assist customers with ticket purchasing during the busier period in the morning. The removal of certain duties at Bishop's Stortford (as an example) allows a multi-skilled host to concentrate fully on assisting customers with a ticket purchase, providing assistance or providing information.
		Evidence of ticket sales for a six week period by 15 minute breakdown has already been provided Evidence of ticket machine sales for a six week period by 15 minute breakdown has already been provided Evidence of booked and unbooked assistance data over the first six periods of the 2023 / 2024 year (010423 - 160923) is shown in Evidence No 5
22	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?	All multi skilled hosts, including the proposed mobile teams, will be provided with the same level of training in relation to ticketing and the product range that colleagues in the ticket office receive today.
23	What should passengers do if they cannot find the ticket they need on a TVM and no staff are available to help? How long is a passenger expected to try and find a staff member to help them?	After reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore, staff will continue to be available at stations to provide assistance to customs this regards to ticketing equiviries for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. This will also be supported by our mobile teams.
		Our multi-skilled hosts will be positioned at designated welcome / assistance points (subject to business case approval) in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis with input from our accessibility panel). A 'Welcome Point / assistance 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 an common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. If assistance is required customers will be able to ask for this support. Please see Evidence No 4 for an example of a welcome / assistance point at one of our stations. At stations where there is one colleague on duty and they are called away to assist a customer on another part of the station, as they could be today from a ticket office, the colleague will return to the area of the welcome point / assistance point once this is assistance is provided.
		We will also install signage (subject to business case approval) at stations to let customers know when a multi-skilled host will be at the station. This has been an outcome of our Equality Impact Assessments. In 2023, we installed signage at unstaffed stations served by services with on-board conductors to let customers know how to obtain assistance from conductors. These signage was positively commented on by a customer, to one of our Service Quality Regime auditors stating how helpful he thought the sign was which advised passengers how to obtain additional assistance if required".
		Our ticket machines also have Virtual Ticket Assistance (VITA) – which is a 'help' (ticket assistance) button connecting customers to our 24/7 Customer Contact Centre in Norwich. Not only can they provide advice on the best ticket option for a customer, but colleagues based there can take over ticket purchase and issue for the customer (and can also organise assistance), if that is helpful to them.
24	What rationale was used when determining whether a station should have a floorwalker present?	The rationale for determining the staffing at stations was based on the peak customer demand at the station, assistance requests and the number of ticket sales at a station, either via the current ticket office or ticket machine. No station would become unstaffed as a result of these proposals.
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent multi-skilled host presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours.
	Paying By Cash	
	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?	GA has reviewed the level of cash transactions through both Ticket Offices and ticket machines and there are no concerns with the increase in cash payments through the ticket machines. The ticket machines will continue to be emptied of cash with no limitations on the number of coins or notes accepted. GA will ensure that ticket machines are sufficiently resourced to ensure cash useage at the required levels. We have taken steps to ensure the continuation of this facility in the future, with arrangements for machine maintenance, together with cash deliveries and collections, to support this method of payment. In addition our multi-skilled hosts will be trained to attend to minor faults to ensure this facility is maintained.
26	If not all TVMs accept cash, are those that do in an accessible location. For example can they be reached from all platforms, and if TVMs are in multiple locations across the station is it clear where cash ones are?	At least one of our ticket machines at every location accepts cash as a method of payment and is clearly signed to that effect. We have taken steps to ensure the continuation of this facility in the future, with arrangements for machine maintenance, together with cash deliveries and collections, to support this method of payment. In addition, our multi-skilled hosts will be trained to attend to minor faults to ensure this facility is maintained.
		GA ticket machines are located in the optimal positions on stations so customers can easily find them using clear wayfinding signage. Ticket machines are located in accessible positions and take into account the peak demand at the station. Further considerations such as sun glare, visibility from a safety and security perspective and the requirements for shelters are also taken into account.
		Our ticket machine supplier has confirmed that the ticket machines at GA stations conform to DfT's 'Design Standards for Accessible Stations'

27	If a person cannot pay by cash at the station what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?	At least one of our ticket machines at every location accepts cash as a method of payment and is clearly signed to that effect. We have taken steps to ensure the continuation of this facility in the future, with arrangements for machine maintenance, together with cash deliveries and collections, to support this method of payment. In addition our multi-skilled hosts will be trained to attend to minor faults to ensure this facility is maintained.
		In the event that a ticket machine is unable to take cash, as per the policy today, appropriate discretion would be applied. The National Rail Conditions of Travel provides the conditions under which a passenger may travel without a ticket without incurring a penalty fare.
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours.
		Therefore if a customer is unable to obtain a ticket the multi-skilled host will firstly undertake basic maintenance of the ticket machine to resolve the issue. If the fault continues, the host will report both the fault and also ensure that messaging is sent out across the GA network advising the non availiability of cash purchase facilities from that station. This process is already established.
		Whilst there is no specific station signage, advice will be available from the multi-skilled host at the station, or via the ticket machines through our Virtual Ticket Assistance (VITA) – which is a 'help' (ticket assistance) button to connect customers to our 24/7 Customer Contact Centre in Norwich or via the help point.
	Providing assistance to travel in a timely and reliable manner	
28	When static station staff are a) reduced in number and b) reduced in hours how will turn up and go assistance for disabled passengers be maintained?	Part a) - The rationale for determining the staffing at stations, was based on the peak customer demand at the station, assistance requests, the number of ticket sales at a station either via the current ticket office or ticket machine and the removal of certain duties from colleagues at some stations. The consolidation of former platform duties and ticket office duties will result in adequate number of staff to assist customers. The provision of assistance will be a priority for our multi-skilled hosts.
		Part b) -Station staffing hours are aligned with peak customer demand. This has been a data driven process involving reviewing Passenger Assistance data for each station in scope. Any proposed reduction in staffing hours was limited to stations where unbooked assistance levels are low, particularly at certain times of day. Outside of station staffing hours, assistance will either be provided by onboard staff (where available) or our mobile team. Customers will be asked to contact us via the help point or ticket machine (using the ticket assistance button) so that their assistance can be arranged. As per ORR Accessible Travel Policy requirements (3.2A), we will advise customers that unbooked assistance from stations that are unstaffed will take a period of time to be arranged and therefore we will encourage customers to book in advance.
		After reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore, staff will continue to be available at stations to deliver unbooked assistance for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. This will also be supported by our mobile teams.
		Evidence of booked and unbooked assistance data over first the six periods of the 2023 / 2024 year (010423 - 160923) is shown in Evidence No 5
	If this is reliant on onboard staff how will passengers be assisted to move around the station to the platform / to purchase the correct ticket / get advice / journey plan? How will passengers alert the guard if they haven't pre-booked assistance?	Currently, outside of staffing hours, on board conductors provide assistance at Clacton-on-Sea, Colchester Town, Diss, Frinton-on-Sea, Great Yarmouth, Lowestoft, Manningtree, March, Stowmarket, and Thetford. On board conductors are equipped to sell tickets and are able to advise customers on journeys. Conductors have access to the Passenger Assist app so they can see who has booked assistance for their service. Conductors are trained to identify key signs that a customer may need some help – such as having a mobility aid, guide dog, cane, or wearing a sunflower lanyard. Customers can also ask the conductor for assistance if they haven't got a booking.
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will continue to be available at stations to deliver booked and unbooked assistance for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. There will also be support from our additional mobile teams.
30	If the mitigation is to provide an accessible taxi what processes will be put in place and what is your assessment of the adequacy of this compared with travel by train?	An accessible taxi will be used as last resort (as is the case today). There is a national issue with the provision of accessible taxis because of the lack of regulation. However, we meet bi-weekly with our taxi provider to review issues and to develop an action plan. For example, our taxi provider is currently approaching accessible taxi suppliers at some stations on our network where provision is not adequate.
		It is important to note that the proposed introduction of mobile teams will reduce our reliance on accessible taxis to enable customers to complete their full journey by train.
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will continue to be available at stations to deliver booked and unbooked assistance for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. There will also be support from our additional mobile teams.
31	What monitoring regimes will be put in place to measure time taken and reliability?	GA already has an established complaints review process whereby our Accessibility. Inclusion Manager has oversight of all accessibility related complaints to drive an appropriate investigation and corrective actions. They also chair are monthly working group attended by key areas of the business to review customer insight (from complaints as well as other sources - e.g. GA's We're All Ears customer survey, feedback from the Passenger Assistance customer-facing app, and mystery shops completed by our Accessibility Panel) to drive strategic actions. Staff will be asked to report any known issues (as today) to drive any investigations necessary. Our taxi provider also supplies us with data on time taken to arrive at booked location and levels of cancellations. Specific issues are raised with our taxi provider, including at a bi-weekly meeting, with a ction plans developed as applicable.
32	How will people summon help if staff are not there?	We will install signage (subject to business case approval) at stations that are staffed part-time to let customers know how assistance can be obtained (and at what times) and what to do if they have a booking or do not have a booking. This has been an outcome of our Equality Impact Assessments.
		In 2023, we installed signage at unstaffed stations served by services with on-board conductors to let customers know how to obtain assistance from conductors. These signs have worked well. Please see Evidence No 6 which shows an example of this signage. The signage was positively commented on by a customer, to one of our Service Quality Regime auditors stating 'how helpful he thought the sign was which advised passengers how to obtain additional assistance if required".
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will continue to be available at stations to deliver booked and unbooked assistance for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. There will also be support from our additional mobile teams.
33	Do all stations have tactile paving fitted – the need for this is increased if the station is to have no or less staff in future?	All stations in scope of this consultation will have tactile paving installed on all platforms by the end of 2023.
34	What evidence do you have that mobile staffing teams will be able to robustly deliver assistance and support in a timely and reliable manner?	Our proposed mobile teams are placed in strategic locations across the network. The length of time a customer has to wait for unbooked assistance will depend on a number of factors, such as notice period, traffic conditions, location of the team etc.
		We currently use a mobile team between Wickford and Southminster, and Billericay and Prittlewell, providing assistance to customers outside of current ticket office hours (where applicable) or at unstaffed stations along these routes. This approach has been successful, with positive feedback received through our 'We're all Ears' survey, as a result of the assistance received from this mobile team.
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will continue to be available at stations to deliver booked and unbooked assistance for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. There will also be support from our additional mobile teams.

35	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?	Our proposed multi-skilled hosts will be positioned at designated welcome / assistance points (subject to business case approval) in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis with input from our Accessibility Panel). A 'welcome point / assistance point' would be a ninitial focal point on entering a station that provides any customer who needs support // 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. Please see Evidence No 4 for an example of a welcome / assistance point at one of our stations.
		At stations where there is one colleague on duty and they are called away to assist a customer on another part of the station, as they could be today from a ticket office, the colleague will return to the area of the welcome / assistance once this is assistance is provided.
		The queuing arrangements at stations will follow the same principles that are used today at ticket offices. At busier stations if barriers/queuing systems are needed to organise any queues at ticket machines they will be used as required. These arrangements are currently employed at a number of locations when justified.
36	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?	The rationale for determining the staffing at stations, was based on the peak customer demand at the station, assistance requests, the number of ticket sales at a station, either via the current ticket office or ticket machine, and the removal of certain duties from colleagues at some stations. The consolidation of former platform duties and ticket office duties will result in an adequate number of staff to assist customers.
		At busier stations the number of colleagues assigned to assist customers has been determined based on the assistance requests at that station. For example, the proposal at Bishop's Stortford station is for 3 multi-skilled hosts to be assigned to assist customers during the busier period in the morning. The removal of certain duties at Bishop's Stortford (as an example) allows a multi-skilled host to concentrate fully on assisting customers with a ticket purchase, providing assistance or providing information.
		Evidence of ticket sales for a six week period by 15 minute breakdown has already been provided Evidence of ticket machine sales for a six week period by 15 minute breakdown has already been provided Evidence of booked and unbooked assistance data over the first six periods of the 2023 / 2024 year (010423 - 160923) is shown in Evidence No 5
37	What assurances can you provide that staff will not be pulled away to other duties rather than	The provision of assistance will be a priority for our multi-skilled hosts, both those based at a station and the mobile teams. The removal of certain duties at some
	providing assistance?	stations and the movement of staff from behind a ticket window will allow multi-skilled hosts to focus on providing assistance when required.
38	Will induction loop facilities be provided elsewhere on the station/concourse?	Yes (subject to business case funding), also noting that our help points are already fitted with induction loop facilities. Our proposed hosts will be positioned at designated welcome / assistance points in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis with input from our accessibility panel). It is anticipated that in the majority of cases a induction loop facility will be provided in this area. However, this again will be determined on a station by station basis with input from our Accessibility Panel.
39	What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?	GA already has an established complaints review process whereby our Accessibility & Inclusion Manager has oversight of all accessibility related complaints to drive an appropriate investigation and corrective actions. They also chair a monthly working group attended by key areas of the business to review customer insight (from complaints as well as other sources - e.g. GA's We're All Ears customer survey) to drive strategic actions.
40	How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?	In the majority of cases ancillary information is displayed in the ticket hall area, at the front of the station or on the platforms. At stations with a ticket hall, this will remain open for the same amount of time as today. At the small number of locations where this information is displayed in the ticket office, the information will be moved to an area accessible to customers.
41	What devices will staff have? How will staff be able to give people journey itineraries and other printed info?	Multi-skilled hosts will be provided with tablets and mobile phones (subject to business case approval). If a customer requires a printed travel itinerary, this will still be able to be provided.
42	Are help points at every station and are they in an accessible location? Are there any plans to position help points in concourse areas near ticket offices to avoid having to walk along platforms or over bridges to summon help?	Yes, help points are in place already at all of our stations in scope. All help points have been checked to ensure they are accessible. There are no plans to position help points near ticket offices as most are visible from the entrance of platforms. No customers need to use a footbridge to access a help point.
43	What are you existing processes and SLAs for monitoring that help points are working, how quickly calls are answered and the response time to faults? What future commitments can you give?	GA have an in-house telecoms team that monitor help point functionality and respond to any arising technical issues. When any technical issues arise, GA aim to rectify the issue within 7 days, though any sites with a single help point are given priority. GA is looking at integrating Artificial Intelligence software on its help points to provide faster responses to customers; this will provide considerable detail on how help points are used by customers, which in turn will support longer-term improvements.
44	How will you monitor/report time taken to answer help point calls / proportion not answered?	We track National Rail Enquiries performance through our contract with the Rail Delivery Group and receive periodic compliance data which is reviewed. Testing of help point functionality and answering is also included within the DfT specified Service Quality Regime. All forms of help point performance data is reviewed as part of our internal customer experience governance processes.
	Preventing unfair penalty fares	
45	What changes to ticketiess 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?	GA Conductors and Revenue inspectors currently operate in an environment where many stations are unstaffed or have ticket offices open only in the morning. Procedures are already in place to provide information to on-train staff about short term ticket office closures through sickness etc and any ticket machines that are out of order. They are therefore experienced in ensuring that customers who genuinely have been unable to purchase a ticket before travel are not penalised. In that environment it is not considered that any change to ticketless travel rules are required.
		National Rail Conditions of Travel provides the conditions under which a passenger may travel without a ticket without incurring a penalty fare.
		However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will continue to be available at stations to assist customers for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. There will also be support from our additional mobile teams.
		Therefore if a customer is unable to obtain a ticket the multi-skilled host will be able to provide advice and reassurance. If required, messaging can be sent out across the GA network advising that a customer has not been able to buy a ticket from a station. This process is already established.
		Whilst there is no specific station signage, advice will be available from the multi skilled host at the station, or via the ticket machines through our Virtual Ticket Assistance (ViTA) service – which is a 'help' (ticket assistance) button to connect customers to our 24/7 Customer Contact Centre in Norwich - or via the help point.
46	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?	As is the case today, where customers join at an unstaffed station, or one where the ticket office is closed, GA on-train staff are trained and experienced in dealing with this situation and there is no evidence of adverse customer feedback to our approach.
47	How will you review signage to avoid sending inconsistent messages about revenue protection?	All current Revenue Protection signage is compliant with the Penalty Fare Scheme rules and considered appropriate in not sending an inconsistent message. There is no evidence of customer confusion around the Penalty Fares Scheme
48	What evidence does the passenger need in order to ensure any revenue protection action against them can be withdrawn, if they were travelling without the correct ticket because they couldn't purchase it before they boarded the train?	This is a current situation that occurs on a regular basis now. GA has extensive experience in managing these instances and we will continue to afford the necessary discretion where appropriate to our staff, ensuring the customer is not disadvantaged. Current examples include if someone used a railcard discount but used the incorrect one or boarded a train but was unable to purchase a ticket due to the TVM not working (GA would, check if the TVMs are not working as this would be logged). We would, of course, also continue to afford extensive discretion when dealing with individuals with particular needs that may have had difficulty in
		purchasing the right ticket or operating the TVM.
49	Availability of Facilities Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn?	GA have committed to ensure that customer facilities will remain open for the same amount of time as they are today as well as ensuring that no station would become unstaffed as part of these proposals. Mobile teams will be in place across the network to ensure there is no change in the availability of customer facilities. This is supported by a station cleaning team who visit stations to ensure each customer facility is maintained to a high standard.

	And if so when will any proposed mitigations be implemented?	
		The mitigations outlined in the response to question 49 will be in place prior to any ticket office closures.
	And if facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?	GA have committed to ensure that customer facilities will remain open for the same amount of time as they are today, as well as ensuring that no station would become unstaffed as part of these proposals. Mobile teams will also be in place across the network. This approach is supported by a station cleaning team who visit stations to ensure each customer facility is maintained to a high standard. This all allows regular checks of customer facilities to remain in place, supported by CCTV. GA currently has in excess of 3000 cameras across its station estate all of which are in high definition. All Station CCTV can be accessed from our control centre and can be monitored if required. Also to note, is that the DTT service Quality Regime requires us to achieve certain standards of station facilities and presentation, and we are regularly audited against these standards by an independent third party. However, after reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during
	Safety and Security	which stations will have a permanent staff presence. Most stations will see <u>no change</u> in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Therefore staff will continue to be available at stations for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. There will also be support from our additional mobile teams.
	sopery and Security Have you liaised with the British Transport Police about the impact on staff and passenger security?	Safety and security is a key priority for GA. We have regular engagement with the British Transport Police to understand any safety and security trends on our network. In addition to this, the Department for Transport (DfT) and British Transport Police (BTP) have agreed that we should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. These will be completed once all of our discussions with Transport Focus and London TravelWatch are finalised and once all of our internal consultation has been concluded. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.
53 A	Are any mitigations planned?	Any proposed mitigations will be reviewed and implemented based on the outputs of the risk assessments. Therefore, the risk assessment process will need to conclude prior to agreeing any mitigations (should any be required).
	is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?	GA currently has in excess of 3000 cameras across its station estate all of which all are in high definition.
C	Other Issues	All station CCTV can be accessed from our control centre and can be monitored remotely if required.
	Future Changes What assurances can be provided that the level of station staffing outlined in the proposal is	The levels of station staffing will be managed in the same way as they are today.
	delivered and maintained in the future?	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.
		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) — should this be agreeable with ORR in light of its current ATP Guidelines (September 2020).
		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, and requires TOCs to have clear measures in place when considering changes to station staffing levels to ensure the continued provision of unbooked assistance (A1.2(f)). 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 as follows:
		"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."
		The ORR guidance also states that should significant or material changes be made to a revised ATP, then ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC), Transport Focus and (where relevant) London TravelWatch.
	Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?	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. This does not cover the hours of station staffing more widely.
		The TSA was brought into use in July 1995 following the introduction of train operator franchises. At that time the predominate retail channel for rail tickets 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 tickenines 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 retailing options.
		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. Addressing this issue 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 stations for those who require assistance.
		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 is recommended that additional commitments on station staffing levels be linked to TCC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP). Please refer to our response to Question 68.
	How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?	The new staffing arrangements will be advertised in the same way in which the current ticket office opening hours are advertised. This would be via the GA website via the station information page, National Rail Enquiries via the station information page and the station welcome poster displayed at the station.
		We will also install signage (subject to business case approval) at stations to let customers know how assistance can be obtained (and at what times). This has been an outcome of our Equality Impact Assessments. In 2023, we installed signage at unstaffed stations served by services with on-board conductors to let customers know how to obtain assistance from conductors. These sign have worked evell. Please see Evidence No 6, which shows an example of this signage. The signage was positively commented on by a customer, to one of our Service Quality Regime auditors stating "how helpful he thought the sign was which advised passengers how to obtain additional assistance if required".
		Each train company has 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 stans. 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.
58 F	How will compliance with any agreed new hours be monitored and reported?	As per the answer to question 68 above, 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.
		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) – should this be agreeable with ORR in light of its current ATP Guidelines (September 2020).
		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, and requires TOCs to have clear measures in place when considering changes to station staffing levels to ensure the continued provision of unbooked assistance (A1.2(f)). Changes to the ATP are controlled, with the agreement of any new ATP, or change to the area of the provision for involvement of stakeholders regarding the ATP provisions at a local station as follows:
		"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."
		The ORR guidance also states that should significant or material changes be made to a revised ATP, then ORR will formally consult with the Disabled Persons Transport

59	What arrangements have been made to provide staff cover for things like sickness and holiday?	There are sufficient staffing numbers within our proposals to provide cover for holidays and sickness as is the case today.
	Timing of mitigations	
60	Timing of mugations 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, and we will just be waiting for delivery of equipment or completion of an upgrade. The intention is for the "Day 1" mitigations to act as a full mitigation 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. This approach would also allow for wider station changes and arrangements to be implemented, as soon as is practical, that will assist with modernisation and efficiencies to provide a better service for customers and better value for taxpayers.
61	Is there any reason that London Travel Watch should not object to the change until the mitigations have implemented and can be demonstrated to be adequate?	There is no reason that London TravelWatch 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 online or app, either at their origin station, during their journey or at their destination, in line with our pledge that passengers will never have to travel out of their way to buy tickets.
62	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, "When authorising Operators to commence TSA consultations, the Department set out at range of parameters with which an Operator's proposal must comply. Operators then took action to consult on ticket office changes in line with the rail industry's Ticketing and Settlement Agreement (TSA). The Department has not approved any proposal put forward by an Operator and will not do so until consultations are concluded."
		The letter also clarifies the Minister's expectations that Train Operating Companies will be refining their proposals as part of this consultation process without restarting the process.
		"Train operators have entered into discussions with the passenger bodies to take account of the feedback received through the consultation responses. We expect train operators to work collaboratively with the passenger bodies in the coming weeks, listen to the concerns raised and to refine their proposals accordingly."
		"We expect to see operators develop and adapt their proposals where needed in response to points raised in the consultation."
	Liaison with other operators	
63	What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?	The impact of the proposals in respect of ticket office closures and alterations have been progressed with all other operators, as appropriate, and as required through the consultation process contained in the Secretary of State's Guidance for Major Change Proposals. There have been no objections or adverse responses from any other operator.
	Cost Benefits	
	or will travel without paying as a result?	Due to the confidential nature of commercially sensitive information, it is not possible to share actual numbers. However, we believe that by making staff more accessible to passengers at the stations and with the introduction of concepts such as welcome/assistance points (subject to business case approval) and continued improvement to services such as Passenger Assist and easier digital ticketing that we can encourage more people to use the railway on a more regular basis. We also continue to promote both the convenience of buying on line or from ticket machines and we continue to promote rail travel both through promotions such as our "Hare Fares", which have been successful and by highlighting the improved service standards delivered by the introduction of new trains across our entire network. The cost of delivering an effective service is also a key consideration in light of the most recent National Rail Passenger Survey (NRPS) conclusions. The survey highlighted that the proportion of journeys rated as satisfactory by passengers regarding value for money for the price of their ticket nationally was 47%. Any cost savings made through the redeployment of staff and closure of ticket offices will ensure better value for money for the tax payer and passengers. In his letter to the Transport Select Committee, dated 11th September 2023, the Minister of State for Transport, Huw Merriman MP supports this view: "At present, I believe that ticket office staff are underutilised. Enabling ticket office staff to move from behind the screens into new multi-skilled roles providing additional face-to-face support to whom and where is most needed, could be an opportunity to make better use of taxpayers' money, given the current unsustainable subsidy levels." We continue, across the rail industry, to explore alternative channels for ticket retailing, but working towards making all ticket types universally available on all channels is likely to drive up the costs of running the railway. Therefore, a strategic approach to
65	What, if any, plans do you have to monitor and evaluate these changes should the proposals go ahead? What KPIs would you be using as part of this?	Feedback will be actively sought from colleagues in order to monitor and evaluate these changes should the proposals go ahead. Local and senior managers are constantly across the network at busier times of the day and will also be observing practices as part of their roles. The Ticketing and Staffing section of the Service Quality Regime (SQR) also includes specific criteria relating to the availability and full functionality of ticket vending facilities, help points and colleague presence (where it is expected to be). The results of these third party audits are reportable to customers via the website on a periodic basis. The SQR also requires us to achieve certain standards of station facilities and presentation, and we are regularly audited against these standards by an independent third party. GA has recently launched a new customer satisfaction survey (We're All Ears) where customers can directly give us feedback. This survey – with a mixture of quantitative and qualitative questions – includes a specific section on the retailing proposition at the station. The results and the verbatim feedback from this survey are regularly reviewed and analysed by the Customer Experience Team before being discussed internally with colleagues throughout the business on a periodic basis. This survey allows for us to understand any specific issues (as well as more general trends) relating to customer satisfaction right across the network and ensure we are responding to this feedback. From Spring 2024, a new, national Rail Customer Experience Survey is expected to be launched which will measure all parts of the customer journey and provide granular detail on customer satisfaction on a station by station basis, providing extra feedback on retailing issues.