

6 September 2023

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Govia Thameslink Railway

(sent via e-mail)

Dear ██████████

## **GTR's Proposals under the Major Change Process of the Ticketing & Settlement Agreement (TSA)**

I am writing on behalf of London TravelWatch in response to GTR's proposals to close ticket offices at 114 stations on your network in our geographical remit.

As you'll be aware, the public consultation period has now ended, and London TravelWatch has received more than 180,000 responses in total. We are continuing to process these, and we will provide a more detailed analysis of consultation responses once we have had the opportunity to carefully review the content of all the responses.

Alongside this we have been analysing the information you provided to London TravelWatch as part of the consultation process, including the major change template spreadsheet (Annex B) and supporting documents.

Under clause 6-18 (1) of the TSA, changes to opening hours 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.

So far, both the public responses and our own analysis have shown that there are a number of concerns regarding GTR's proposals, and their ability to meet these criteria. We have outlined these below and attached an appendix with a list of questions requesting more clarification on these points.

### **1) Easy and widespread availability of tickets**

As part of any proposals, customers must be able to buy the ticket they need for their journey in an easy and timely way. However, we and the public question whether this will still be feasible for all passengers if your proposals are to be implemented. Some of the biggest problems raised include:

#### *Adequacy of retail facilities*

Although increasing numbers of passengers are switching to purchasing tickets online rather than at the station, not everyone is able to use these methods to buy their tickets, for example if they don't have internet access or the tools are not accessible. In our research from earlier this year, one in six

people told London TravelWatch that they are unable to buy a ticket as they can't use or don't have access to a smartphone or internet connection - the equivalent of more than 1.5 million Londoners.<sup>1</sup> Even when someone has access to digital channels, the complexity and variety of ticket options available means many people do not feel able or confident enough to book their travel tickets without assistance from staff. Without evidence to the contrary, we must assume that many people will continue to want advice and support at the station and not migrate to digital channels.

Where passengers can buy their tickets from a Ticket Vending Machine (TVM), we have questions about TVM's ability to meet the retail capacity needed if ticket offices close, particularly at stations where ticket office sales are relatively high and especially at peak hours. In GTR's case, this includes stations such as Bedford, Luton and Stevenage. This presents the risk of customers facing significant queues to purchase tickets. If TVMs cannot cope with the additional demand there is a risk of passengers being faced with unacceptable queues to purchase tickets, which could lead to increasing instances of them missing trains or boarding without any ticket.

In addition, we do not know GTR's existing TVM usage (both sales and ticket collections) to determine whether there is sufficient capacity to absorb this level of sales. And you have advised that although you have supply of handheld devices, your proposal does not involve the issue of a handheld device to every staff member/station but to reallocate them based on need.

We are mindful of standards for queuing times at present (3 minutes in the off-peak and 5 minutes in the peak) but that these apply only to ticket offices and not TVMs. It would be as unacceptable for a person to miss a train while queuing at a TVM as it would be if queueing at a ticket office.

GTR propose that passengers can buy tickets not available online or on TVMs at larger stations, with the intention to make them available to purchase online in the future. No timescale or further details are given for this transition, nor has it been explained how those passengers without access to digital channels will be able to access these tickets online in future if they can't do so currently.

### *Usability, functionality and accessibility of TVMs*

You have provided information about the range of products and services which would be available at stations as an alternative should the ticket office be closed. We note that items such as refunds, "miscellaneous" and all sales made by payment methods other than cash or card will not be available by TVM; indeed, it appears that there will be no alternative at station method to deal with these products. If your ticket offices were to close this would represent a concerning decrease in retail capability at stations, which in the absence of a ticket office will stop some people buying the ticket or service that they need. For those products and services which you have said will be available in future, it is also unclear if they are currently available.

Even where tickets are available on a TVM, the TVMs themselves may not be accessible for all passengers to use. For example, they may not be at the right height for wheelchair users and the visually impaired and blind community have found the touch screens inaccessible. Some TVMs can also be difficult to use for visually impaired people if they are placed outside in the line of direct sunlight or receive glare from indoor lighting. If staff assistance to purchase a ticket from a TVM is not available at the station – or perhaps via remote/video assistance – passengers, in particular Disabled passengers, will find it harder to purchase a ticket before they board the train.

Many members of the public find TVMs problematic as they can be slow to work and confusing to navigate. For instance, there can be a range of different fares for the same journey, with different restrictions for different times, not always necessarily obvious. We are also aware that the TVM home

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<sup>1</sup> Left Behind Londoners - Digital Exclusion and Disadvantage in London transport:  
<https://www.londontravelwatch.org.uk/campaigns/digital-exclusion/>

screen may show fares that are not applicable for the time of purchase, such as displaying more expensive weekday fares on a weekend, which we have been advised is the case at Stevenage.

We know it is not uncommon for TVMs to be out of order, which can result in longer queues at the remaining TVMs. For those stations where there is only one TVM (the case at many GTR stations), if the ticket office is closed and the TVM not working, passengers will be unable to buy a ticket. An increased reliance on TVMs makes it even more important that they are monitored and maintained, as well as kept clean so that the touch screen keeps working.

Your sales data shows a significant proportion of tickets sold at some ticket offices still being purchased with cash and have been advised that cash TVMs are present at all your stations in our area except Brookmans Park and Essex Road. It is important, though, even on the TVMs which provide the option to pay by coins or notes, that this remains available every day. We know there are times when issues with TVMs mean that this option is not available even at times when paying by card is still possible.

Whilst we understand under your proposals many staff at stations will be able to help people buy their tickets at TVMs, there are questions about whether they will have sufficient expertise to navigate the complex and – at times – confusing fares system. In contrast to many other self-service retail situations, many passengers will need support not just to use the TVM but also to understand the most appropriate ticket to purchase when faced with multiple ticketing options for the same journeys.

## **2) Providing assistance to travel in a timely and reliable manner**

We know that passengers value staff at stations. This is not just with selling tickets but also in relation to safety and security, and in providing information, advice and support especially during times of disruption.

It therefore appears unacceptable that under your proposals some staff availability will be reduced. We also question whether staff in multi-skilled roles, not just retail, will have enough capacity available to meet the needs of all passengers rather than be stretched too thinly. This particularly relates to the impact this may have on accessibility and the ability of Disabled people to travel by train, especially the ability to 'Turn Up and Go.'

From the latest iteration of data which you have provided us, we calculate that at six stations in our area the proposals would mean a reduction in the hours for which those stations are staffed, usually on a Sunday. Even where a staff presence has been maintained, there are instances where the number of staff available appear to be reduced (such as Caterham and Denmark Hill). Part of the reduction at stations such as Epsom, Finsbury Park and Harpenden appears to stem from a decision to merge the current Gateline and Ticket Office staff into the new Station Host role, but usually with fewer staff in the new role than in the current roles combined.

The roles of Station Host, General Purpose Relief and Platform non-dispatch all contain ticket retailing in their role capabilities. Whilst this flexibility can be seen as a positive in one sense, on the other hand it means these staff members will also have multiple functions to perform rather than just retail.

There are also questions about how the new arrangements would work in practice. Whilst the theory is that staff may be more visible outside of a ticket office, the reality may be that they are harder to find. At present, the ticket office is a clear focal point passengers when looking for help from staff. These locations are often set up to provide more accessible support, for example with some guide dogs trained to go to the ticket window, and induction loops to help people hear. Passengers need to have an easy to find place to go to find staff or notify staff that they need assistance. We ask how people will find a staff member if they need help and what queuing arrangements will apply when several people want help at the same time. This is relevant to provide clarity and assurance for all passengers but especially Disabled passengers and others requiring assistance.

We understand that station help points may be used to mitigate these issues, with passengers likely to be more reliant on these to obtain assistance and information if a ticket office closes. But we have concerns about the operation and reliability of help points and research by the Office of Rail and Road<sup>2</sup> identified a number of issues with their use. The report suggested that it may be difficult for Disabled passengers to have confidence in boarding a train if they request assistance from a help point at an unstaffed or partially staffed accessible station.

GTR's overarching Equality Impact Assessment refers to developing mitigations on issues such as station meeting points, hearing induction loop facilities and how to make it as easy as possible for customers to contact a member of staff at any GTR station, but there appear to be no firm answers yet to the developing thinking.

### **3) Preventing unfair penalty fares**

As mentioned above, proposals to remove ticket offices that rely on TVMs that are not fully accessible, do not sell the full product range and/or do not accept cash will mean more passengers are unable to buy the ticket they need before they board the train.

GTR's proposals will mean that some passengers, especially those who either cannot use, or have chosen not to use, digital will have to travel out of their way to buy these products because they are only available at selected larger stations. This goes against the Rail Delivery Group's pledge that 'Customers will never have to travel out of their way to buy tickets.' You confirm that the cost of this journey will be refunded but this does not account for the inconvenience and difficulty this additional journey will cause many passengers, as well as the sense that they are being disadvantaged through no fault of their own.

Given this, it is crucial that all passengers are clearly made aware that they can board a train without a ticket and be confident they will not be penalised if they do so. There are concerns that these passengers will be relying on the good will of train staff to not issue them a penalty fare, and questions of what they would need to provide to prove that they could not buy the right ticket before travelling. Additionally, signage at stations must not send contradictory messages, so penalty fare notices stating passengers are required to have a ticket before boarding a train must be consistent with other notices to instruct passengers to buy certain tickets on board or at their destination.

### **4) Availability of station facilities**

It is crucial that access to vital station facilities including lifts, waiting rooms and toilets be maintained at stations, even when staffing hours or staffing numbers have been reduced. This would worsen the customer experience, particularly for Disabled people and those in more vulnerable situations, for example a solo traveller at night without access to a waiting room.

You have advised us that you are 'committed to maintaining the same level of access to station facilities...as they are under the current station staffing hours.' However, the Thameslink and Southern consultation web pages only say that you are keeping access to station facilities such as toilets 'under review depending on the outcome of the consultation.' It is therefore not fully clear what GTR's plans are and we seek clarification on this.

### **5) Safety and security**

Proposals which reduce, redeploy or remove staff presence at stations risks making passengers feel less safe. Passengers are concerned about anti-social behaviour and crime at stations, and fear that it will worsen if fewer are staff present, particularly in the evenings. GTR propose to reduce staffing

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<sup>2</sup> Accessible Travel Policy Implementation Review of unbooked assistance and Help Points: [accessible-travel-policy-implementation-review-july-2022.pdf](https://www.orf.gov.uk/wp-content/uploads/2022/07/accessible-travel-policy-implementation-review-july-2022.pdf)

hours at six stations, which is a considerable concern, although we acknowledge that at many others the hours will increase, particularly late into the evening.

We note that the British Transport Police have informed us that an extensive programme of Safety, Security and Vulnerability risk assessments need to be completed and mitigations agreed before any proposed changes are implemented.

## 6) Other issues

Other issues have also emerged during the consultation process:

### *Future changes*

The public consultation feedback has highlighted a widespread concern that if ticket offices are closed and Schedule 17 regulation no longer applies, there will be no further protections to prevent train operators removing all station staff in future without passenger consultation. Staffing is clearly a crucial part of supporting people to use the rail network. We seek reassurance on this key concern. An alternative regulatory mechanism covering station staffing could provide significant reassurance to passengers and stakeholders on this point.

### *Timing of mitigations*

There have been many comments about the sequencing of events and a call for fares and ticketing to be reformed and simplified *before* removing ticket offices. The same applies to the timing of potential mitigations designed to lessen the impact of closing ticket offices, such as upgrading TVMs. If mitigations to address the concerns raised are not in place from the first day a ticket office is closed, it may present a serious deterioration in service for passengers until they are introduced.

### *Liaison with other operators*

We are mindful that some of your stations also serve trains run by other train companies, and so your proposals will impact the support to their passengers.

### *Cost benefits*

There are questions as to whether proposals to close ticket offices will actually be cost negative, costing the railways money. While running costs may be lower, if people are deterred from using the rail network because of the issues we have raised above, the potential fall in revenues may outweigh these savings.

## Next steps

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

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

Yours sincerely

[Redacted signature]

[Redacted name]

[Redacted title]

[Redacted contact information]

## Appendix - Clarification questions

### 1) Easy and widespread availability of tickets

#### *Adequacy of retail facilities*

- What assumptions have you made about how many / what proportion of people will move to digital if ticket offices are closed?
- Have you assessed who will not / cannot move to digital and the effect on them of closing the ticket office?
- Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?
- 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, especially at peak hours and at stations with a higher than average proportion of sales from the ticket office?
- 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?
- What mitigations do you intend to put in place to help staff 'queue bust' at busy times (including at stations which won't have staff with access to devices to sell tickets directly)?
- What KPIs will be in place at stations to monitor and report the adequacy of retail arrangements at stations (including to passengers)?
- What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?

#### *Usability, functionality and accessibility of TVMs*

- Which products are not available from your TVMs? This should include not only tickets but also 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).
- How will passengers access products and services not available at the station in future?
- Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?
- 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?
- How will passengers access these products and services in future?
- How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets.
- How will Disabled people who cannot use a TVM purchase a ticket?
- How 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)?
- Is it proposed to upgrade TVMs to offer remote access/video help facilities?
- Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability in different weather conditions?
- 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?
- Are the TVMs which accept cash in an accessible location? e.g. can they be reached from all platforms, and if TVMs are in multiple locations is it clear where cash ones are?
- If a person cannot pay by cash at the station what arrangements will exist to enable them to travel? Will there be clear signage at the station to inform passengers about this?

- 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 and ink, and repairs to faults.
- Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?

## **2) Providing assistance to travel in a timely and reliable manner**

- 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?
- 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?
- 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?
- When station staffing hours are reduced how will turn up and go assistance for Disabled passengers be maintained?
  - 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?
  - If the mitigation is a mobile team how long will people have to wait? If you currently use mobile teams to provide assistance do you have any evidence on their effectiveness (e.g. time taken to arrive, passenger satisfaction)
  - 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?
  - What monitoring regimes will be put in place to measure time taken and reliability?
  - How will people summon help if staff are not there?
  - 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?
- 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?
- 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?
- 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 to replicate the ticket office/window and method for calling them?
- What will the queuing arrangements be when multiple passengers want help/advice?
- What assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?
- How will staff at the station know if passengers need help to board?
- 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?
- What are your 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?
- How will you monitor/report time taken to answer help point calls / proportion not answered?
- Will induction loop facilities be provided elsewhere on the station/concourse?
- What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?
- How will other information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information and bus timetables etc?
- How will staff be able to give people journey itineraries and other printed info?

### 3) Preventing unfair penalty fares

- What changes to ticketless travel rules will be made / where will these be written down to give people who can't buy a ticket some assurances that they won't be penalised?
- What processes will be in place so that passengers do not have to publicly declare/evidence their disability to buy on the train without penalty?
- How will you review signage to avoid sending inconsistent messages about revenue protection?
- 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? What evidence does the passenger then need to ensure any revenue protection action against them can be withdrawn?

### 4) Availability of station facilities

- Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn? And if so, when will any proposed mitigations be implemented?
- 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?

### 5) Safety and security

- Have you liaised with the British Transport Police about the impact on staff and passenger security? Are any mitigations planned?
- Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?

### 6) Other issues

#### *Future changes*

- What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?
- Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?
- How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?
- How will compliance with any agreed new hours be monitored and reported?
- What arrangements have been made to provide staff cover for things like sickness and holiday?

#### *Timing of mitigations*

- What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?
- Is there any reason that London TravelWatch should not object to the change until the mitigations have implemented and can be demonstrated to be adequate?
- Has any necessary funding / agreement been secured to implement any mitigations?

#### *Liaison with other operators and Network Rail*

- What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?
- Have you engaged with Network Rail about the impact where the changes are proposed at St Pancras International and Victoria? Are any mitigations planned?



*Cost benefits*

- Do you have any forecast of the impact on revenue i.e. on how many people will no longer travel or will travel without paying as a result?

*Evaluation*

- 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?