

6 September 2023

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Great Western Railway  
(sent via e-mail)

Dear ██████████,

**Great Western Railway Proposals under the Major Change Process of the Ticketing & Settlement Agreement (TSA)**

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

As you'll be aware the public consultation period has now ended, during which we received 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 GWR'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.

**Easy and widespread availability of tickets**

As part of any proposal, customers need to be able to buy the ticket they need for their journey, in an easy and timely way. However, there are clear questions from the public and ourselves about whether or not this will still be feasible for all passengers if your proposals are to be implemented. Some of the biggest concerns raised include:

*Adequacy of retail facilities*

- Paddington station has 11 Ticket Vending Machines (TVMs) ‘where staff will be available to assist customers with purchasing tickets and to offer assistance.’ Slough station has 6 TVMs. Windsor & Eton Central has 2 TVMs. There are currently no TVMs at Castle Bar station although Oyster card readers are available.
- Considering the first three of these four stations are ‘principally major stations, interchanges between networks and locations where there are significant numbers of customers needing extra assistance to buy’ we are concerned about the capacity to provide for passenger volumes. For instance, station footfall at Paddington last year was 6,391,896. At Slough station it was 1,403,354. At Windsor & Eton Central it was 393,132.
- Where passengers are able to buy their tickets from a TVM we have questions about their ability to meet the retail capacity needed if ticket offices close, particularly at stations where ticket office sales are relatively high. This presents the risk of customers facing significant queues to purchase tickets, increasing instances of missed trains or boarding without a ticket. We realise you do have reserve TVMs that could be used but wonder how quick these could be deployed if needed.
- We note that there is an intended 18-month transition period for some of the four stations within the London TravelWatch geographical remit, known as ‘Appendix B’ stations. However, it is not clear if Paddington, Slough and Windsor & Eton Central are all included in this as GWR’s website states the latter two stations are due to close their tickets windows from June 2024. We understand there will be an 18-month transition period for Paddington station so we are seeking clarity on the others.
- We understand that, as part of this transition, some ticket office counters will remain open i.e. they will not be closed straight away, and there will be a phased approach to closures. Whilst this is a welcome mitigation in some regards, we are not sure what impact this will have for those passengers who may need support with purchasing tickets once the transition period is over. This is particularly pertinent for those such as irregular travellers, visitors from elsewhere in the UK or tourists from overseas. The fact there is a planned transition period could possibly hint to an admission that some passengers will find using TVMs challenging both during and after the transition period.

*Usability, functionality and accessibility of TVMs*

- We understand that not all tickets are available from TVMs. If your ticket offices were to close this would represent a significant decrease in retail capability at stations, which in the absence of a ticket office will stop some people buying the ticket they need.
- Even where tickets are available on a TVM, these are not accessible to all passengers. For example, they may not be at the right height for wheelchair users, and we have had particular concerns from the visually impaired and blind community that touch screens are inaccessible for them. If staff assistance to purchase a ticket from a TVM is not available it will be harder for passengers, particularly Disabled passengers, to purchase a ticket before they board.
- Many responses from the public noted that they find TVMs generally difficult to use, for example they can be slow and confusing to navigate. Others noted that it is not uncommon for TVMs to be out of order, which can result in longer queues at the remaining TVMs or even an inability to buy a ticket at all.
- Where there is no cash retail option many passengers who pay for their tickets this way will not be able to buy a ticket before they board their train. This risks worsening customer experience for these passengers and potentially losing industry revenue.
- A migration of ticket sales to online and digital channels could impact certain types of passengers, including but not confined to Disabled passengers. We know from [our own research](#) that passengers with a range of characteristics face barriers in using digital sales channels (1 in 6 people in London say they are unable to buy a ticket as they can't use or don't have access to a smartphone or internet connection). These barriers to travel are exacerbated by the complexity and variety of ticket options for rail travel, particularly beyond London and its immediate hinterland. We would like to understand better how far such insights have been reflected in assumptions about future channel shift and in the range of potential mitigations which might be adopted.
- Many members of the public have said they find the fares system complex and confusing, and they are often unsure of what ticket to buy. While we understand under your proposals staff at stations will be able to help people buy the right tickets at TVMs (where available), there are questions about whether they will have sufficient expertise to navigate the complex fares system. There are also instances where there are staff in multi-skilled roles, and not just retail, so there are questions about whether there will be enough capacity to meet all passengers' needs.

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

Station staff are a vital way in which many passengers receive assistance when travelling. This is not just with regards to buying tickets, but also providing further assistance, information and advice, support during disruption, and improving safety and security. However, we are concerned that under your proposals staff availability will be reduced, and in turn support for passengers will be worse in practice.

For instance, in the proposals, in terms of staffing Paddington station goes from 87 staff members down to 72, Monday - Friday. On Saturdays Paddington goes down from 84 staff members to 70. On Sundays from 67 down to 58 staff members. At Windsor & Eton Central the dedicated sales advisor role (x2) becomes a 'multiskilled' one (x2) Monday - Saturday and (x1) on Sunday. Castle Bar station remains unstaffed at weekends.

We note that Paddington station had 34,477 Passenger Assist requests between 01/04/2022 and 31/03/2023. Slough station had 928 Passenger Assist requests between 01/04/2022 and 31/03/2023. Windsor & Eton station had 180 Passenger Assist requests between 01/04/2022 and 31/03/2023. Castle Bar Park station had no passenger assist requests - the station has no step free access.

There are additional concerns that with staff deployed in more multi-skilled roles, they may be stretched too thinly to meet passengers' needs. Many respondents to the consultation questioned how they will be able to find redeployed staff at stations – while in theory they may be more visible outside of the ticket office, they may in reality be harder to find. At present, passengers have a clear focal point when looking for help from staff in the form of the ticket office. 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. There should also be a simple way for people to know the order in which they will get assistance in the absence of a queuing system to provide clarity and assurance they will be helped, and avoid potential conflict.

This is a particular issue at some of the major / busier stations including Paddington, Slough and Windsor & Eton Central. As you know, in times of service disruption, the main concourse can get very busy at Paddington. It is a major interchange and termini station with TfL London Underground, Heathrow Express and Elizabeth line services also calling at Paddington. How will GWR staff identify passengers who need assistance during service disruption and how will passengers locate where they can find support from rail staff?

Slough station is a busy interchange especially when events are taking place and Windsor & Eton Central is a major tourist destination serving famous attractions / landmarks and leisure facilities. Again, we are concerned that during times of service disruption passengers will receive a worse service than today and this may disproportionately affect Disabled passengers.

While Castle Bar Park is not considered an accessible station i.e. it is not step free, we note services can connect for key airport links (changing at Reading for Heathrow

/ Gatwick and Bristol Temple Meads for Bristol airport). There is also an Elizabeth line change at Ealing Broadway for Heathrow (though this is only one per day currently in existing timetable). Some passengers will require assistance at Castle Bar for such services even if they do not necessarily need step free access e.g., a blind person who needs support with wayfinding. We would want to see that this has been factored into the plans.

At stations where overall staff presence has been reduced Disabled passengers' ability to 'turn up and go' will be impacted. While mobile staff may be able to offer this service at some stations without static staff, there are concerns about whether this will be able to delivered in a timely and robust way. Additionally, it will inevitably worsen some passengers' experience, with those requiring this service to either pre-book or wait for staff to arrive.

### **Preventing unfair penalty fares**

As outlined previously, proposals to close ticket offices that rely on TVMs that are not fully accessible, do not sell the full product range, can be difficult to use and/or do not accept cash would mean an increase in passengers who are unable to buy the ticket they need before they board the train. Given this, it is important that passengers are made aware that they can board their train without a ticket if they cannot buy the ticket they need from the station, and be confident that they will not be penalised if they do so.

There are concerns that if these ticket office changes are introduced many passengers will be relying on the good will of ticket inspectors to not issue them a penalty fare. There will be questions around 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. For example, 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 final destination.

### **Safety and security**

Passenger feedback so far has highlighted worries around anti-social behaviour and crime, particularly at certain stations, and concerns that these will get worse if there are fewer staff present. This is a particular concern in the evenings and later at night.

We know that Paddington station is centrally located and there is significant nightlife nearby. Passengers using the station to interchange and for onward travel will want to see it well staffed for safety and security assurance.

There are also some concerns about the security of passengers when buying tickets. If a person is situated in a ticket office it is clear they are an official member of staff. However, if they are roving around the station they may be more difficult to identify. While some visual markers will help, for those who are blind or have visual impairments there are questions as to how they will be able to verify the individual helping them is indeed a member of staff. This is a particular worry if the person is

helping them with payment involving cash or card details, or requires the use of the customer's personal phone (for example to help them download a ticketing app).

You may be aware that British Transport Police (BTP) has told us that safety and security assessments need to be completed with mitigations agreed before the proposed changes to ticket offices are implemented.

### **Other issues:**

A number of additional issues have also emerged during the consultation process:

#### *Future changes*

The public consultation feedback so far 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. Clearly, this would not be in the interests of passengers and would be a detriment to rail travel across the country. We believe that staffing is a crucial part of supporting people to use the rail network. An alternative regulatory mechanism covering station staffing would go some way to providing reassurance to passengers and stakeholders on this very important 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 aware that some stations also see trains run by other train companies calling at them, and so proposals will impact those using these services. For instance, Paddington and Slough stations are both served by TfL Elizabeth line services. Paddington is also served by Heathrow Express. Clearly, there will be a large volume of passengers using these stations who are visitors from overseas. English may not be their first language and they may struggle to use or identify the TVMs. There is the risk that they travel without the correct ticket and are then fined even though they have made a genuine mistake. We would want to see a plan around how to handle this.

#### *Cost benefits*

Lastly, a significant number of public and stakeholder responses have questioned whether proposals to close ticket offices will in reality be cost negative, costing the railways money. While running costs may be lower, if people are deterred from using the rail network 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]



## **Appendix - Clarification questions**

### **Issues relating to whether passengers can easily buy the right ticket for the journey they want to make**

#### *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?
- Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?
- Have you assessed who will not / cannot move to digital and the effect on them of closing the ticket office?
- 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?
- Do you plan to issue station staff with handheld ticket machines so they can still offer direct face to face retailing to those that need this support to access the full range of tickets?
- 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 – for example, will staff have access to handheld devices to sell tickets directly?
- How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?
- 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 Ticket Vending Machines (TVMs)**

*Can any of the following be provided from a TVM:*

- National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)
- Boundary Zone add-ons
- Staff travel discount
- Buying tickets in advance rather than on the day of travel



- Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements)
- Seat reservations
- Changing a booking/tickets
- Use of rail vouchers
- Plus Bus tickets
- Group Save
- Off-peak purchases before the off-peak begins (i.e. before 09.30)
- Cycle reservations
- Photocards for season tickets
- 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 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?
- 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?

#### *Availability of specialist retail advice/help*

- 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?
- What should passengers do if they cannot find the ticket they need on a TVM and no staff are available to help? What evidence does the passenger need to ensure any revenue protection action against them can be withdrawn?
- How long is a passenger expected to try and find a staff member to help them? What evidence does the passenger need in order to ensure any revenue protection action against them can be withdrawn?

## *Paying by cash*

- 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?
- If a person cannot pay by cash what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?

## **Issues relating to whether passengers requiring assistance to travel receive that assistance in a timely and reliable manner.**

- 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?
  - 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 / 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?
- How will the focal point of the ticket office/ window be replicated?
- How will people summon help if staff are not there?
- 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?

## **Issues relating to whether passengers can get the information they require to plan and make a journey, including during periods of disruption**

- How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?
- What devices will staff have? How will staff be able to give people journey itineraries and other printed info?

- 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?

### **Issues relating to ensuring passengers are not penalised if they cannot buy the ticket they require from the station**

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

### **Issues relating to whether passengers can continue to use facilities at a station**

- 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?
- 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?

### **Issues relating to whether passengers feel safe at the station**

- 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?

### **Other issues:**

A number of additional issues have also emerged during the consultation process:

#### *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*

- What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?
- Have you liaised with Network Rail around staffing plans at Paddington station?