

* London TravelWatch

31 October 2023

[redacted]

cc: [redacted]

(sent via e-mail)

Dear [redacted],

Great Western Railway (GWR) Proposals to close ticket offices under the Major Change Process of the Ticketing and Settlement Agreement (TSA)

I am writing to you in response to GWR's proposals setting out plans to close ticket offices at stations where GWR is the lead retailer, as part of a wider programme of industry reform.

The proposed changes at 4 of GWR's stations fall within our geographical remit: Castle Bar Park, London Paddington, Slough, and Windsor and Eton Central stations.

We have analysed the information provided to us as part of the TSA process, including the Major Change template spreadsheet, your letter of 27 September in response to ours of 6 September (attached in Annex 1 and 2 respectively), and other supporting documents. We are grateful to you and your colleagues for responding to our queries throughout the process through email and via Teams' meetings, which have also helped inform our decisions.

As you know, we have also conducted a public consultation on the proposals put forward by GWR and eight other operators in our area. The extended public consultation period closed on 1 September and during that time we received 232,795 responses in total. 18,998 of these responses were specific to GWR. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

Following a number of revisions to the original proposals, we understand the main changes being proposed are now as follows:

- * closure of ticket office windows in a phased approach over the course of 18 months

- * redeployment of GWR ticket office staff roles as multi-skilled staff roles located closer to customers and providing a range of customer services, with some changes in staffing levels

- * in a revision to your original proposals, a commitment in your letter of 27 September to ensure that the multi-skilled staff roles will be available at the same times as a ticket office is open today

- * access by multi-skilled staff to sales equipment which, combined with upgrades to ticket vending machines (TVMS), will maintain the ability for passengers at stations to buy the full range of tickets available there

today, notwithstanding the expected continued shift of transactions to digital and mobile sales channels

* creation of new 'Welcome Points', which will include a 'Help at Hand' button to call staff, to address passenger concerns with the original proposals in knowing where to go for help.

Public response to the changes

During the consultation period London TravelWatch received a total of 232,795 representations via email, freepost and phone (see note 1). These were a combination of responses to individual stations, specific TOCs, and to the proposals across all companies and stations. Of these 231,471 (99%) were objections. 51,853 responses objected to all changes across the rail network.

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

There were specific campaigns which generated a large number of responses including template emails and post. While the majority of these responses followed the standard text some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received postal petitions with a total of 15,923 signatures generally objecting to ticket office closures. We also received copies of the following online petitions:

Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>

Megaphone - <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticketoffices>

We are also aware of the following online petitions:

Parliament - <https://petition.parliament.uk/petitions/636542>

38degrees - <https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition>

We also received a survey report from 38 Degrees with 26,194 responses objecting to the changes nationally.

We also received many responses from stakeholders including MPs, local authorities and representative organisations.

GWR received 18,998 responses specific to them. Of these, 18,949 were objecting to the proposals. Objections were received for all of the stations covered by the GWR proposals. A station-by-station breakdown of the responses can be found in Appendix 1.

The top three issues in these responses were concerns over the ability to buy tickets in future (including needing staff to help them navigate the complexities of the fares system and difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. Throughout the responses the importance and value of staff in delivering these services and support was highlighted time and again.

It is important to note that these are the number of responses to the consultation and not the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area - it was not a national consultation. Therefore, it was possible for people to choose to respond to multiple station and/or TOC consultations.

Our role under the TSA

London TravelWatch has a formal role in assessing Major Changes to ticket office opening hours. If a train company wishes to make such a change it must follow the process set out in the TSA.

Under clause 6-18 (1) of the TSA, changes to opening hours of ticket offices may be made if:

- a. the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and
- b. members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

London TravelWatch may object to a proposal on the grounds it does not meet one or both of these criteria. To assess this, we have reviewed the following factors, which we have derived from section 5 of the Secretary of State's TSA ticket office guidance (21 February 2023):

* Quality of service. This includes the number and skills of station staff and hours deployed, availability of facilities like toilets, waiting rooms and lifts, and provision of information such as wayfinding, routes, and during disruption.

* Access to products. Can passengers easily buy the right ticket for their journey? This includes the product range available at the station and off-site, support to get the ticket including advice on the correct fare, and retail capacity. Passengers should also be confident that if they have to travel without a ticket (for example if it's not available at the station) then they will not be unfairly penalised.

* Accessibility. Passengers needing assistance should receive this in a timely and reliable manner. This includes arrangements for booked assistance, the ability of passengers to 'turn-up-and-go', the ease of requesting assistance, the ability to pay by cash or card, and the accessibility of ticket purchasing methods including TVMs and non-digital options.

* Safety. This includes both perceived and actual security, access to help if needed, and support if there is a safety issue.

* Future monitoring. How will train companies ensure that changes are working well for passengers? In addition, what, if any, protections are in place to ensure that, where appropriate, passengers are consulted on future major changes to staffing?

* Cost effectiveness. Do the financial benefits outweigh any costs that the changes may incur, including through funding mitigations or any potential loss in revenue?

Our assessment of the proposals

London TravelWatch understands how GWR's proposals in principle might benefit passengers. Redeploying staff potentially allows them to provide a more personal service, to a larger number of people at the station than the declining proportion of passengers who visit a ticket office, whilst at the same time making more effective use of their time and skills. This in turn could allow the railways to run more efficiently and so improve their financial sustainability.

The key question for us is whether the evidence that has been provided is robust enough to show that the benefits to passengers mark an improvement

on the current system and will be evident from day one of the proposals being implemented.

We share the view expressed recently by the Transport Select Committee that it is "perplexing" that the rail industry has put forward proposals before the promised simplification of fares and ticketing has been delivered. Part of the reason why passengers value the presence of ticket office staff is because, for some, they are an essential source of advice in buying the best ticket for their journey. That arises from the perceived complexity of today's rail fares and the fear that passengers may not be getting the best deal for their travel. We believe that closing ticket offices should happen after fares reform has taken place and shown to be a success.

Nevertheless, we have considered carefully the results of the public consultation on your original approach and, together with our own analysis of the proposals themselves, we have come to the following views on the aforementioned 6 factors.

Quality of service

Our particular focus under this category is on the potential impact of the proposals on staffing hours and staffing levels.

We welcome the revision to your original proposals to ensure that existing retail staffing hours will remain unchanged at the four stations in our area. Based on the information you have provided us about proposed staffing levels, we note the following:

- * at two of the stations, the level of full time equivalent (FTE) staffing in customer-facing roles is due to be cut on weekdays, but increased at weekends:
- * on Mondays-Fridays, London Paddington would see a 10% cut in multiskilled, ambassador and help desk FTEs (from 21 to 19); Slough would see a 24% cut in sales advisor and ambassador FTEs (from 10.5 to 8)
- * on Saturdays and Sundays, London Paddington and Slough would see an increase of 12% (from 17 to 19) and 60% (from 5 to 8) respectively in FTEs in those roles

- * at Castle Bar Park and Windsor and Eton Central, there is no change planned in customer-facing FTEs deployed at these two stations
- * at all the stations, the summary description of duties for existing ticket office staff is "retailing, ticketing advice, customer information and assistance":
- * for the new multi-skilled roles, "retailing" is removed from the description, but we understand that staff in these roles will be trained to offer help with TVMs, with the switch to digital, and if necessary to sell tickets
- * with the exception of Windsor and Eton Central, the new multi-skilled roles, unlike the existing ticket office roles, will have a new function in providing accessibility support, which we understand will be additional to your existing assistance service.

Our assessment of the potential impact of these elements is that:

- * each of the 4 stations across the whole week would see more customer-facing staff out and about at stations, available to engage with passengers face-to-face due to the redeployment of ticket office staff. This would be so even with planned weekday cuts in customer-facing roles at London Paddington and Slough:
- * for example, under current arrangements at London Paddington there are 11 ambassador and help desk FTEs deployed Monday-Friday, with retail

staff confined behind ticket offices windows. Under the proposals, 19 FTEs would be deployed within easier reach of passengers 7 days a week

* the proposed numbers of retail-trained staff are unchanged throughout the week at London Paddington, Castle Bar Park and Windsor and Eton Central, so the same level of expertise as now would be available to passengers needing help buying a ticket. At Slough, aside from the increased level of specialist retail support available at weekends, we judge that the weekday reduction in such roles from 9 to 8 will not negatively impact quality of service given that ticket office sales at the station are approximately a quarter below their pre-Covid level and do not look set to recover to that level

* the range of duties for the proposed multi-skilled staff roles do not look materially different from those of today's ticket office staff. In principle, it is not obvious that they would create an unsustainable new workload (though see our comments later about queuing at TVMs), yet they do provide some passenger benefit at three of the stations in our area in the form of additional help alongside the existing assistance service.

Taking all the above factors into consideration, we judge that the proposals as they relate to future staffing hours, levels and duties would improve the visibility and accessibility of GWR staff when helping passengers at the 4 stations in our areas. Based on our assessment specifically of these aspects relating to quality of service, we would therefore not object to the proposals.

However, we are concerned that in future passenger bodies would not have the same opportunity to scrutinise and comment on potential further changes to staffing levels as today. This is because the TSA process would not apply in a situation where there is no longer a ticket office at GWR stations.

The rail industry has argued that this concern can be addressed through the current arrangements under which operators comply with an ORR-approved Accessible Travel Policy (ATP). It is good that the industry has now recognised there is an issue here, but the ATP proposal has emerged at an advanced stage of the consultation process and has not been fully explored.

Our view is that the ATP approach offers weaker protection for passengers' interests than the TSA, under which bodies such as London TravelWatch are not merely consulted but are asked to approve or object to proposals. We recognise that satisfactory resolution of this issue is not something that GWR can determine alone, but until it is in place we object to the proposals to close the ticket offices at GWR stations.

Access to products

In this category, our focus is on how far GWR's proposed combination of TVM capacity/capability and staff support at the station would, alongside other sales channels, ensure continued widespread and easy access to the purchase of rail products.

We are glad that the original proposals have been revised so that GWR will maintain the ability for passengers at stations to buy every ticket currently available there today. Based on the information you have provided to us, we note the following:

* stations like London Paddington and Slough, with multiple ticket office windows, will see more gradual, phased implementation of the closures

than others, as passengers over time move further towards digital channels and upgraded TVMs to buy their tickets:

- * the single ticket office windows at Castle Bar Park and Windsor and Eton Central will stay open for a further 9 months after implementation of the proposals begins, before the windows are closed

- * Slough will go down from 5 to 3 ticket office windows for 9 months before the remaining windows are closed

- * London Paddington will go down from 9 to 5 ticket office windows for 12 months before the remaining windows are closed

- * staff will initially have access to existing ticket office equipment, while still able to leave the ticket offices and offer multi-skilled services, including queue-busting and selling tickets not yet available on TVMs

- * following training and procurement, ticket office machines will be replaced by handheld machines which can sell tickets. TVMs will also be upgraded to offer a wider variety of tickets, and tickets only available via ticket office systems will be digitised, with GWR continuing to promote digital as the best option to buy tickets

- * GWR expect the full process of TVM upgrades and digitisation of rail products to be complete by March 2025.

You have also provided information on sales channels, as part of the original proposals which went to public consultation and in one of the annexes to your letter of 27th September, from which we observe the following:

- * at Slough and Windsor and Eton Central, ticket office and TVM sales in nominal terms are down by about 20-25% and 40% respectively on pre-Covid levels (which had been broadly static over the preceding 10 years). By contrast, there has been a big pick up in ticket sales via TfL contactless payments (CPAY) and off-station e-tickets

- * Castle Bar Park sales are virtually entirely accounted for by TfL CPAY and Pay As You Go (PAYG) journeys, with no ticket office sales made in 2022/23 (there is also no TVM at the station)

- * TVM and ticket offices nevertheless still account for big shares of sales at Slough (35.9% and 31.8% respectively) and Windsor and Eton Central (30.7% and 38.2% respectively). Unfortunately, you have not been able to provide a full set of comparable figures for London Paddington, but over 1.243 million tickets were sold at the station through the ticket offices and TVMs in 2022/23, with a roughly 48:52 split between the two channels. This simultaneously suggests there may be ample scope for migration to digital channels and that there is a significant transition to manage in the process.

The proposed deployment of specialist retail staff is an important part of providing support to passengers in having continued widespread and easy access to the purchase of rail products. We have already established above that we would not object to the revised proposals as they relate specifically to the approach on staffing hours, staffing levels and the duties for customer-facing staff.

However, with regards to TVM capacity and capability under the proposals, we remain uncertain on the following issues:

- * GWR provided helpful information mapping future TVM capacity at Slough and London Paddington in one of the annexes to your letter of 27 September:

* although the assumptions used represented a worst-case scenario, for example, in terms of sales shift from ticket offices or towards digital, the information did identify the times and days when TVM capacity could be especially tight. These were mornings, Tuesday-Thursday and Saturday at Slough; and mornings Thursday-Saturday at London Paddington

* it is not clear how far the intended mitigations would ensure that TVM capacity at these times would be sufficient to support future usage. We note GWR will be completing a review of your TVM fleet and will make changes where you feel there is opportunity to meet customer demand better, but we have yet to understand the outcome of the review for London Paddington, Slough, and Windsor and Eton Central

* we are unclear about your plans at the above stations for arrangements to ensure orderly interaction between passengers and multi-skilled staff. Our fear is that, absent the traditional queues at ticket offices, former ticket office staff released from behind counter windows and located close to TVMs may be subject to multiple simultaneous requests from passengers seeking support and so potentially they could be less efficient in their use of time. Our uncertainty on this point is made deeper by your statement in the 27 September letter that GWR do not propose to introduce maximum queuing times for TVMs

* with regard to improved TVM functionality, we note from your 27 September letter that the Rail Delivery Group (RDG) has agreed in principle with the Department for Transport (DfT) that funding for Retail Enhancements will be available; and that the release of this funding is subject to the conclusion of the consultation process. It is important point to us, however, that mitigations such as these are in place first for us to support the proposals.

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

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

To conclude, under this category

* we have no concerns regarding the impact at Castle Bar Park station of the proposals relating to access to products

* we remain uncertain about how far the mitigations relating to TVM capacity and capability at London Paddington, Slough and Windsor and Eton Central are sufficient, and how passenger access to multi-skilled staff will be managed effectively

* we are concerned about the continued mis-representation of London rail fares on National Rail Enquiries and TOC websites. Until this is properly resolved, we object to the proposals at the 4 GWR stations in our area.

Accessibility

We know from responses to the public consultation that there is much concern about the potential impact of the ticket office closure proposals

on those passengers who have particular needs when boarding/alighting trains or buying tickets.

We note that Passenger Assist and Turn Up and Go services at London Paddington are provided by Network Rail (NR) staff. GWR have helpfully confirmed that the NR team available to provide assistance with accessibility is not affected by the ticket office proposals. You have also said that the current level of assistance provided to passengers at Slough and Windsor and Eton Central will remain unchanged.

Indeed, you have confirmed that the multi-skilled staff roles (unlike the ticket office roles which they are replacing) will include assistance duties as a complement to your existing assistance service, which could be of particular benefit to customers who Turn Up and Go at your stations. At Castle Bar Park, which has no step-free access, GWR will continue to provide alternative travel for those unable to access the station.

However, we are concerned about the approach towards providing a focal point at stations for people with accessibility needs. We are aware of the industry-wide concept to introduce Welcome Points which would be a set area in the station for people to get assistance from staff. You have said that GWR will review your existing Meeting Points and create new Welcome Points with a "Help at Hand" facility.

We think there is merit in the Welcome Points idea, but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the welcome point and needs assistance, whether induction loops would be fitted, clarity over what support will be provided to passengers and whether the welcome points will be fixed. The RDG's letter of 11 October sought to address these points but it is clear that there is still no real certainty for passengers on what would be provided.

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

With regard to the accessibility of buying tickets, we are pleased that

- * the revised proposals mean that passengers who are digitally-disadvantaged or digitally-excluded will have the option to buy from multi-skilled staff with access to ticket-issuing machines

- * the deployment of multi-skilled staff with access to ticket-issuing machines also provides an option for those passengers who say that they find TVMs either very difficult or even impossible to use

- * GWR have confirmed the continued ability for passengers to make cash purchases, through the cash-enabled TVMs at London Paddington, Slough, and Windsor and Eton Central, as well as via multi-skilled staff with access to ticket-issuing machines.

However, we note your intention that individual station EqIAs (whose current status are as working documents and will be updated once a number of key questions have been resolved) will not be completed until after we have registered our decision on the proposals. Our view is that these need to be comprehensive (for example, auditing the accessibility of TVM design and location, which are issues of concern to Disabled passengers), completed and any identified mitigations put in place before we can approve the proposals to close ticket offices.

Safety

We welcome the feedback session which you have had with your local British Transport Police team to clarify and update them on the safety and security aspects of your proposals to close ticket offices. We also recognise that the proposals on staffing (see above) should increase the visible presence of staff at London Paddington, Slough, and Windsor and Eton Central and this should have a positive impact on passengers' perceived sense of security and safety.

We note the intention to complete a Crime and Vulnerability Risk Assessment (produced by the Department of Transport in collaboration with the BTP). Our view is that that should be done, and any mitigations identified as necessary implemented before we can approve the proposals.

Future monitoring

We believe it is important to have clarity in advance about the arrangements to monitor the implementation of the proposals. Having a clear set of agreed, publicly-reported yardsticks on quality of service allows operators to show how well their proposals are working and helps passengers to hold operators to account.

We have yet to see a suggested complete set of such metrics by which the impact of GWR's proposals, if implemented, could be assessed. We note that the Rail Delivery Group (RDG) has said that, to ensure an impartial baseline and assessment of the proposals is available, operators propose to use the National Rail Passenger Survey previously conducted by TF. As that survey was paused in 2020 due to Covid, RDG has been developing the Rail Customer Experience Survey which is due to start in 2024 and which it is suggested will track future metrics.

Our view is, taking all these points together, there is considerable work yet to be done by GWR working with other operators, passenger bodies and others to agree which specific core metrics will be used and which recent measurements will be used to provide a meaningful baseline against the success or otherwise of the proposals could be measured. We would also have expected to see some indication of the expected future movement in the measured scores to support GWR's view that the proposals will deliver an improvement in one or other aspect of quality of service. We need the arrangements for future monitoring of implementation to be agreed with us and in place before we can endorse the proposals.

Cost effectiveness

Under the TSA, cost effectiveness is one of the specific criteria we are asked to consider in assessing the proposals. Aside from making the general point in your letter of 27 September that you are not forecasting a drop in travel or revenue, we have not seen fuller details which demonstrate the business case for GWR's proposals to close ticket offices at stations in our area.

We understand that some of the information may be sensitive, but we are disappointed that the industry has not been able to find a way, at

individual TOC level, to share some quantitative detail in terms of the overall scale of net financial benefit; the ratio of benefit to costs; the full set of costs and benefits assessed; and the payback period.

The lack of available evidence is all the more remarkable given the emphasis that has been placed by the rail industry and government on improved value for money as a selling point for the proposed closure of ticket offices. Without this information, we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness. We therefore have little option under this category but to object to the proposals.

Decision and next steps

Given the above assessment, London TravelWatch objects to the proposals put forward by GWR based on the following reasons:

- * agreement has not yet been reached with the rail industry on how passengers' interests might best be represented in future, should proposals be brought forward for further staff reductions after the current ticket offices are closed

- * we remain uncertain about how far the mitigations relating to TVM capacity and capability at London Paddington, Slough, and Windsor and Eton Central are sufficient, and how passenger access to multi-skilled staff will be managed effectively

- * the continued mis-representation of London rail fares on National Rail Enquiries and TOC websites has not yet been properly resolved

- * GWR, working the other operators, needs to secure the endorsement of DPTAC, Disabled people and representative groups on the concept, design and implementation of Welcome Points

- * the individual station EqIAs and proposed Crime and Vulnerability Risk Assessment have not yet been completed, nor any identified mitigations implemented

- * a set of specific core metrics and baseline measurements has not yet been established against which to measure the impact of the proposals

- * we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness.

If GWR still wishes to proceed with these proposals, in order for us to withdraw our objection we would require these issues to be fully addressed first. Alternatively, GWR may appeal our decision to the Secretary of State for Transport, at which point our involvement in this process will end.

We would like to extend our thanks to you and your colleagues for engaging with us throughout this process. If you have any questions, please do let us know.

Yours sincerely,

[redacted]

London TravelWatch

* Station: Castle Bar Park
Objections: 1

* Station: London Paddington
Objections: 434

* Station: Slough
Objections: 139

* Station: Windsor and Eton Central
Objections: 59

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London TravelWatch is the operating name of the London Transport Users' Committee.

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