

Ticket office consultation – summary of the process and London TravelWatch’s assessment

London TravelWatch has objected to all train companies’ proposals to close ticket offices in our geographical remit. This overview sets out the consultation process, the criteria we used to assess proposals and the key assessments made in making this decision.

Consultation process

The procedure for making a major change to ticket office opening hours is set out in the Ticketing and Settlement Agreement. This requires a train company to post details of the change at affected stations and to invite people to send representations to Transport Focus or London TravelWatch, depending on its location.

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the Ticketing and Settlement Agreement. 13 train companies announced their plans simultaneously, of which 9 were consulting on stations in London TravelWatch’s operating area. Ticket offices outside of London and the surrounding areas are covered by Transport Focus.

Concerns about the consultation process were raised, especially over whether people (and especially disabled people) had adequate information on which to comment and over the short consultation period. We note that train companies subsequently made proposals available in alternative formats and published Equality Impact Assessments. We had previously written to each train company requesting they make this information available. The consultation period was also extended by the train companies to 1 September, giving people longer to respond.

During the consultation period London TravelWatch received a total of 232,795 representations via email, freepost and phone.¹ These were a combination of responses to individual stations, specific Train Operating Companies (TOCs), and to the proposals across all companies and stations. Of these 231,471 (99%) were objections. 57,179 responses objected to all changes across the rail network.

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.

We analysed these responses and used them to help inform our decision on whether to object to the proposals for stations in our operating area.

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

Criteria to assess train company proposals

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. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State for Transport for a decision. The Department for Transport has published guidance setting out the approach the Secretary of State would take in these circumstances.

To assess whether proposals meet the criteria, we have reviewed the following factors, which we have derived from section 5 of the Secretary of State's TSA ticket office guidance (21 February 2023):

- **Quality of service.** This includes the number and skills of station staff and hours deployed, availability of facilities like toilets, waiting rooms and lifts, and provision of information such as wayfinding, routes, and during disruption.
- **Access to products.** Can passengers easily buy the right ticket for their journey? This includes the product range available at the station and off-site, support to get the ticket including advice on the correct fare, and retail capacity. Passengers should also be confident that if they have to travel without a ticket (for example if it's not available at the station) then they will not be unfairly penalised.
- **Accessibility.** Passengers needing assistance should receive this in a timely and reliable manner. This includes arrangements for booked assistance, the ability of passengers to 'turn-up-and-go', the ease of requesting assistance, the ability to pay by cash or card, and the accessibility of ticket purchasing methods including ticket vending machines (TVMs) and non-digital options.
- **Safety.** This includes both perceived and actual security, access to help if needed, and support if there is a safety issue.
- **Future monitoring.** How will train companies ensure that changes are working well for passengers? In addition, what, if any, protections are in place to ensure that, where appropriate, passengers are consulted on future major changes to staffing?
- **Cost effectiveness.** Do the financial benefits outweigh any costs that the changes may incur, including through funding mitigations or any potential loss in revenue?

Throughout London TravelWatch's analysis the impact of the proposals on passengers and whether, in accordance with the terms of the Ticketing and Settlement Agreement, they represent 'an improvement on current arrangements in terms of quality of service' has been the focus.

We have also taken into account specific circumstances surrounding a station as well as issues raised by members of the public during the public consultation stage.

Key assessments

London TravelWatch has now completed our analysis of the proposals, including reviewing responses received from members of the public, and published our response to each individual train company.

We recognise that the way that many passengers buy their ticket has changed, with increasing numbers choosing to buy online, or through apps or via Pay As You Go contactless payment. We acknowledge that the proposals were designed to respond to this shift in customer behaviour, with the idea being that 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.

We also acknowledge that train companies have made significant improvements to their original proposals in response to concerns raised in the consultation, especially in reinstating staffed hours at many stations.

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.

Having analysed these revised proposals, we still have a range of concerns. Some of these are on an industry wide basis, and are applicable to all of the proposals across TOCs. Even beyond these though, there remain TOC and station specific issues at just under two-thirds of stations where changes are being consulted on.

Key assessments include:

- **Quality of Service**

Most train companies significantly revised their proposals in response to concerns about a reduction in the hours at which stations would be staffed. However, at a number of stations the proposals would still see a reduction in staffing hours and/or levels.

Therefore, at these stations we are not satisfied that the proposals would represent an

improvement for passengers requiring assistance, information, advice or for passengers' perceptions of personal security.

Across all stations we are also concerned that in future passengers 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 c2c stations in London TravelWatch's area. It is important that an alternative engagement and consultation mechanism is developed to provide passengers with confidence about any potential future material changes in staffing at a station.

- **Access to products**

In this category, our focus is on how far proposed retail channels and support (including staff) would ensure continued widespread and easy access to the purchase of rail products. This included reviewing aspects such as retail capacity and product range. There have been significant improvements to proposals following concerns, most notably for the most part committing to retain ticket office/handheld machines at stations, which staff can use to sell the full range of tickets. However, we still have concerns about the quality of access to rail products.

As was clear in the public responses to the consultation, part of the reason why passengers today continue to 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 in turn arises from the complexity of today's fares system and the fear that passengers may not be getting the best deal for their travel. While this is true at all stations, this issue would be exacerbated at some stations under these proposals, as under some TOCs' proposals staff would not have the same degree of retail knowledge and expertise, and so would not necessarily be able to provide customers with the same level of advice.

Many respondents to the consultation also expressed concerns that they would no longer be able to access products and services that are not available on ticket machines. This includes concern about the availability of key products such as Railcards and facilities for passengers reliant on cash. Where it was proposed that products would not be available at the station but could be purchased elsewhere on their journey, we also have concerns about clarity of information for passengers so they could buy with confidence and know they will not be penalised.

We are not satisfied at some stations that there are sufficient capacity in alternative retail options, typically ticket vending machines, to ensure that passengers can still purchase a ticket without a risk of excessive queues. Queuing time targets, monitoring and reporting for ticket vending machines (based on those currently in use at ticket

windows) should be implemented to give passengers assurance before any changes take place.

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.

- **Accessibility**

Staff are an important part of making stations and rail travel more accessible, providing information and assistance as needed. Therefore it is again positive that most TOCs have revised their original proposals to revert back to the same or similar staffing hours as is currently present at stations. However, we are still concerned about the risk that accessibility could worsen (for example, in terms of delivering Turn-Up-and-Go (TUAG) and Passenger Assist) at those stations which could see the reductions in staffing hours and/or numbers mentioned above.

Many respondents to the consultations had concerns about how they would be able to find redeployed staff at stations, should the proposals to close ticket office go ahead. The train companies have since proposed that ‘welcome points’ will be developed at stations across the network as an initial focal point that provides any customer who needs support or advice a place to start their journey in the absence of a ticket office. We think there is merit in this idea but there is much that still needs to be developed. We believe it is important that there is further engagement with passengers, and in particular disabled people and representative groups, on the concept, design and implementation of welcome points.

- **Safety**

Safety was a concern raised by many respondents during the consultation period, and so we welcome the engagement industry has had with the British Transport Police (BTP) this issue. We note the intention to complete a Crime and Vulnerability Risk Assessment (CVRA, produced by the Department of Transport in collaboration with the BTP) of your proposed ticket office closures, but our view is that this should be done, and any mitigations identified as necessary implemented, before we can approve the proposals.

- **Robust monitoring and review**

It is important to make sure any changes are working for passengers. Therefore a clear set of agreed, publicly-reported yardsticks on quality of service should be in place before any changes are made to help passengers hold operators to account. We did not feel that enough had yet been done to agree a set of specific core metrics and baseline measurements by which the impact of the proposals (if approved) could be established.

- **Cost effectiveness**

Under the TSA, cost effectiveness is one of the specific criteria we are asked to consider in assessing the proposals. We have not received substantial information to demonstrate the cost effectiveness of these measures. We understand that some of the information may be sensitive, but without evidence we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness.

In light of the above issue, we do not believe these proposals meet the criteria under which changes to ticket offices may be made, and so London TravelWatch has objected to all of the proposals to close ticket offices.

Response to individual train company proposals

London TravelWatch's formal response to individual train companies' proposals can be found alongside this summary document. Those responses outline comments received during the public consultation and set out London TravelWatch's conclusions for each individual train company. This includes an overview of the number of representations we have received and the main issues raised in the consultation.

If you would like any of our ticket office consultation documents in a different format, please contact us by:

- Email: info@londontravelwatch.org.uk
- Telephone: 0203 176 2999
- Post: FREEPOST RTEH-XAGE-BYKZ, London TravelWatch, PO Box 5594, Southend-on-Sea, SS1 9PZ