



Date 27th of September 2023

Sasha Langeveldt
Campaign and Advocacy Officer,
London TravelWatch,
Europoint
5-11 Lavington Street
London
SE1 0NZ

Dear Sasha,

Re: West Midlands Trains (WMT) Proposals under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing further to your letter dated 06th September 2023, where London Travel Watch asked a series of initial clarification questions in relation to West Midlands Train proposal to close ticket offices. This was set out thematically, in line with the feedback received during the public consultation.

I have provided a response to each question raised, with further information about our proposals with appendix documentation to aid where required.

This letter outlines our position regarding the initial proposals as set out at the beginning of the consultation period on the 05th of July 2023. This does not signal the end of the period for review of the proposals, and I welcome the continued opportunity to discuss these ahead of the 31st of October, receipt of your final recommendations, and beyond. I recognise that the proposed changes are significant and that they will require further consideration in advance of any implementation plans.

The order of the following questions and answers are set out in the order in which they were initially presented.

Should you require any further clarification ahead of the 31st of October 2023, I would welcome the opportunity to provide them, and recognise that any further communication would be subject to the same publication requirements as this letter.

Yours sincerely,

West Midlands Trains



Area: Expected impacts of the proposals

- 1. What quantitative assessment has been made of the overall costs and benefits of the proposals (for example, in terms of the impact on staff costs and fares revenue), and over what period of time?**

West Midlands Trains has developed a business case in line with the industry which outlines the overall costs and benefits associated with the proposed changes. We are confident that the correct measures and mitigations are in place to protect the railway. West Midlands Trains expect that the transitional trend of channel shift will continue in the coming years at the same rate that it has over the last 5 years, therefore we do not believe there will be an impact on revenue (Please note Appendix A).

- 2. What are the intended specific measures of customer service quality and what is the current picture provided by the data generated through those measures?**

West Midlands Trains would envisage the current customer service measures to continue as they are currently operating. We do recognise that there will be an initial impact whilst customers behaviours adapt to the new operational model, but that overtime this would deliver a benefit to customers and the railway.

- 3. We understand that there are queuing time standards for ticket offices (three minutes off peak and five minutes in the peak), but that these do not apply to Ticket Vending Machines. Will there be standards for maximum queuing times at Ticket Vending Machines and how will queue lengths be monitored?**

The queueing time standards in reality are difficult to record and mitigate for in real time, we do not have additional staffing available to cater for spikes in customer numbers or demand. This is going to be the same for our proposals going forward. We will however work with real-time results and monitor customer feedback and intelligence from our roving teams on the ground and utilise this in order to be able to deploy roving teams to 'queue bust' where we can, utilising mobile ticketing machines. It is possible that there may be longer queues in the immediate period following implementation, particularly at larger stations. However, there is no intention at this time to introduce new set standards for queue times. This is because of our targeted active promotion of online purchasing and multi-skilled station staff who will have access to existing mobile/hand-held devices available to help those passengers who do not, or cannot, switch. We are therefore not expecting Ticket Vending Machines to need to meet the same demand as ticket offices currently, even during peak periods. We will continue to monitor Ticket Vending Machine usage to identify suitability as we do currently.



- 4. What monitoring regimes will be used to measure the time taken and quality of assistance provided to those passengers with accessibility needs? What is the current picture provided by the data generated through any existing monitoring?**

Customer assistance will be undertaken by Senior Conductors on board the train. Our accessibility team monitors the number of assists (booked and unbooked) carried out each period, as well as reviewing assistance related complaints and customer satisfaction. Where there are regular or related incidents, these would be investigated, and a solution/mitigation identified with the relevant team/s to address the problem.

Area: Overall level of staffing

- 5. Please confirm the proposed cut in numbers of FTE staff in customer service roles and in the hours of their deployment, compared with the existing arrangements. Please explain what stress-testing has been done to establish the resilience of the staffing proposals to manage sickness and leave, vacancy levels and the impacts of train service at these stations.**

In line with Industry Guidance there is a proposed reduction in FTE for ticket office staff equal to 60%. Any subsequent staff deployment plans have annual leave factored into the roster, in line with current / common principles that provide 'spare' lines. Absence management is part of our business-as-usual line management process.

- 6. How would any new staffing arrangements be advertised to passengers in place of the present arrangements to advertise ticket office opening times? How will compliance with any new hours be monitored and reported?**

At this stage we need to work on the commitment associated to the advertised staffing hours of staff at our locations. We recognise the request for this, to ensure that customers have the reassurance associated to knowing this. We also need to balance this with ensuring we do not lose the benefits associated to the flexibility of being able to deploy our staff to effectively react to incidents/ad hoc special events. These will require additional resource that cannot necessarily be planned for and does not fit alongside the fixed advertised presence. It should be noted that this will allow for us to cater for issues at currently unstaffed locations. We would welcome the opportunity to work with passenger bodies on capturing this balance effectively for the benefit of our customers.

- 7. What arrangements will be put in place to ensure that a fixed, advertised staff presence will not subsequently be substantially reduced or removed without further passenger consultation?**

As outlined above we would welcome the opportunity to give an indication of when passengers should expect to see a member of staff, and under normal circumstances we commit to fulfilling these hours daily. We do however also have to plan for, and be able



to react to, certain situations where things go wrong on the network, or when special events occur which will require higher levels of staffing than normal. This flexibility allows West Midlands Trains to ensure that customers affected in such a situation are supported. At such times it could mean that staffing presence at these location/s are affected; this will not be a permanent change, with the staff member returning to duty on site at the earliest opportunity.

8. Will all Customer Experience staff have the same high level of training in the full range of ticket products to ensure there is maximum flexibility to provide expert assistance in navigating the complex fares system and ensure passengers get the right ticket?

In practical terms it is very likely that a high number of former ticket office staff will form part of the multifunctional roving teams; they will therefore retain their ticketing knowledge. For new recruits going forward it is our expectation that they will receive substantial retail training as ticket office staff do today. The roving teams will be able to retail tickets from a mobile device and guide customers through the options available at a Ticket Vending Machine.

9. Please provide details on how the proposed remote operation of station facilities and gate lines would work, and whether this approach has been tried and tested elsewhere.

We are working with our supplier to understand exactly how this would work. They are in the testing phase of a new technology which would allow remote monitoring and management of gate lines. Adaptations to the gate line area may be required to facilitate this service. A similar trial is ongoing in a UK station currently. We already manage some facilities remotely, and West Midlands Trains are in the process of developing a plan which can be rolled out granting remote control of a wider range of facilities.

10. Please provide details on how the latest version of the proposed changes, which specifies hours of staff availability at our six in-scope stations, will now affect stations on the currently unstaffed Abbey Line stations.

We have undertaken work to understand what an indicative deployment plan could look like in line with the initial proposals. As shown in the responses to questions seven and eight, we are working to find the balance of giving customers assurance of when they should expect to see staff at a location and maintaining the ability to flexibly deploy staff to different locations; this will enable a presence at the Abbey Line Stations.

11. Please provide Annex B entries for all our in-scope stations for non-retail services impacts arising from the proposals: these appear to be available only for Apsley.

We believe this information has already been shared within the Annex B document with London Travel Watch and upon reviewing this, it appears that the shared information has



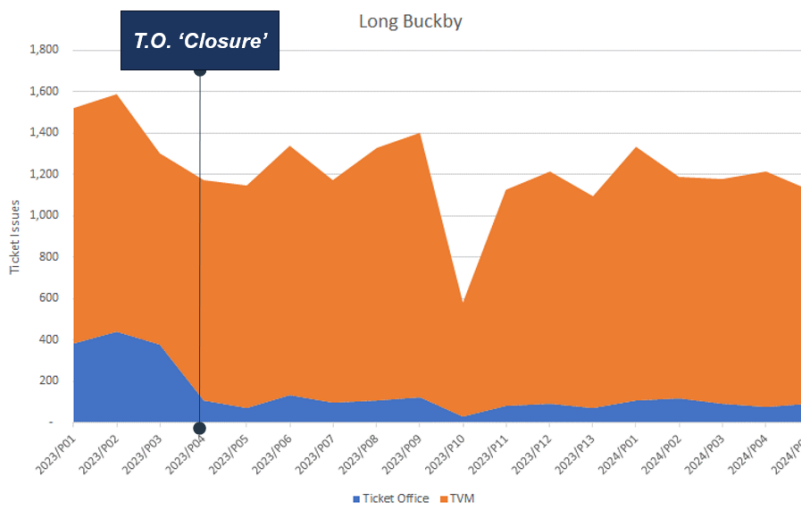
a filter applied against Apsley. If this is not correct, we would welcome the opportunity to meet with you and understand which information is missing as a part of the submission.

Area: Future ticket retailing capability

12. What is the evidence to support WMT’s view of the expected shift of ticket sales to online channels and Ticket Vending Machines if ticket offices are closed, and over what timeframe? We also look forward to receiving further information, as previously agreed, on the changing pattern of ticket sales over recent years at our in-scope stations’ ticket offices and TVMs in relative and nominal terms.

Our expectation is that the continued trend of channel shift will continue in the coming years at the same rate that it has over the last 5 years (As shown in Appendix A). In many cases Ticket Vending Machine usage has trended lower over the last 3/4 years with a shift towards other retailing channels. Data for Ticket Office sales by hour with assumptions on migration to Ticket Vending Machines shows a few examples where this might be an issue. These are almost all West Coast Stations where C-PAY will reduce ticket sales at both Ticket Offices and Ticket Vending Machines.

Example: Despite Long Buckby being closed since July '22 due to staffing issues; the channel shift to digital has moved to 67.2% whilst Ticket Vending Machine sales remain much lower at 19.5%, which is more than suitable and sufficient.



Ticket Issues (FY 22/23)		
Channel	Issues	%age
Ticket Office	2,111	2.2%
TVM	13,865	14.2%
Handheld	2,382	2.4%
Digital	76,403	78.0%
Corporate/Agent	3,096	3.2%
Contact Centre	113	0.1%
Grand Total	97,970	100%

- Consistent ticket issues across period
 - c. 8,100 issues per period
- Continued shift to Digital fulfilment.
 - c. 5% shift over the period shown
- Overall reduction in TVM usage
 - c. 1% reduction despite T.O. unavailability
- Other channels remain consistent, with limited / no evidence of increase of on-train purchase, small (<0.5% increase in contact centre)

Figure 1 - Long Buckby Ticket Sales



- 13. Please provide evidence to show that the proposed combination of staff, TVMs and handheld devices will be sufficient to handle future ticket sales at the station, especially at peak hours. This should include information on -**
- overall and remaining TVM capacity (factoring in existing sales and Ticket on Departure collections per hour);**

In many cases Ticket Vending Machine usage has trended lower over the last 3/4 years with a shift towards other retailing channels. Data for Ticket Office sales by hour with assumptions on migration to Ticket Vending Machines shows a few examples where this might be an issue. Example: Despite Long Buckby being closed since July '22 due to staffing issues; the channel shift to digital has moved to 67.2% whilst TVM sales remain much lower at 19.5%, which is more than suitable and sufficient. (Further information is available in Appendix A)

The new C- Pay Agreement will cover all stations in London Travel Watch (West Midlands Trains) area, which will provide a further alternative retailing method for customers. This is expected to go live in December 2023.

- contractual Service Level Agreements (SLAs) for TVM availability and for fixing out of order TVMs, and recent delivery against those SLAs**

In general, a Ticket Vending Machine should be fixed in time for the next peak. There isn't a Pass/Fail as such, rather an overall availability % which they are judged against, i.e. performance below 98.5% would require action to be taken. There is a 4-hour Service Level Agreement for critical failures, however depending on the complexity of the fault repair times can vary.

- the forecast level of cash sales of tickets at the station and the level of planned TVM capacity to service those sales - any plans you have to upgrade TVM functionality and if so, what would this cover and when would it be complete?**

We are aware of the ability to alter the retailing capabilities of Ticket Vending Machines to retail a wider range of tickets. There are several options on how to do this. We will consider feedback on our plans for stations to understand which alterations, if any, would be most suitable for our Ticket Vending Machines. Any changes would be made in line with industry proposals to ensure consistency across the rail network.

- the proposed numbers and functionality of handheld devices (for example, can they service cash sales) available to on-duty staff, and ease of access to them.**

All of our Senior Conductors have handheld devices capable of retailing tickets with cash or card. We have machines available in all ticket offices which are capable of retailing the full range of tickets to customers. This means we currently have enough devices to retail tickets at present and with the proposed plans.



14. Please clarify exactly what tickets will be available through which channels under the proposals for the five smaller stations in our remit, including which tickets and payment methods will no longer be available at those stations.

The channels available to our passengers are covered in the table below:

Products / Ticket Types available at Ticket Offices	Online	TVM	On-Train
Walk Up Singles & Returns	Yes	Yes	Yes
Advance Tickets	Yes	Collection Only	
Weekly Season Tickets	Yes	Yes	Yes
Flexi Season	Yes	Yes	
Monthly Season Tickets	Yes		
Annual Season Tickets	Yes		
GroupSave	Yes	Yes	Yes
Group Travel (10 or more)	Yes		
Child Flat Fares	Yes		Yes
Rovers & Rangers			Yes
Transport for West Midlands (Multi-Modal) Fares		Yes	Yes
Excess Fares			Yes
Railcard Sales	Yes		
Railcard Discounts	Yes	Yes	Yes
Photocards (required for Season Tickets)	Yes		
Refunds	Yes		
Smartcard Fares	Yes	Yes	
Oyster Top Up Fares (within London Travelcard Area)		Yes	
Seat Reservations (for other Train Operators)	Yes		
Car Park Tickets	Yes		

Detail around the Ticket Vending Machines at these specific stations is covered under question 17.

15. Please clarify whether there is a possibility that, at some point after the proposed changes (if approved) are implemented, there might be further moves to end the sale of more specialist/lower volume fares products via TVMs or handheld devices – and if so, what safeguards would be in place to protect customers’ interests.

The proposed withdrawal of ticket offices is not a precursor to withdrawing any ticket types, the two are separate.

16. Please provide details of the proposed revisions to Appendix B of the Penalty Fares scheme referred to in the summary document, the expected timescale for securing the necessary agreement to any revisions, and any draft guidance to staff on the discretion to be applied in the meantime.

We recognise that changes to the way customers are able to purchase tickets may alter ticket availability at some stations. Therefore, there may be situations where the customers ability to purchase a ticket is impacted until they have boarded a train. This



will be accounted for in the revised penalty fares scheme. Whilst this scheme has not yet been formalised, it would be, ahead of the operational model implementation.

Area: *Support for passengers with accessibility needs and ensuring safety*

17. What supporting evidence do you have to show that measures aimed at mitigating the risk of digital exclusion would be adequate? Do you have any existing programmes designed to tackle this issue, and if so, how effective have these been?

We recognise that there is work to be done in this area, currently West Midlands Trains do not have existing programmes aimed at mitigating digital exclusion; this will be factored into the revised penalty fares scheme. All Senior Conductors are able to conduct cash transactions. Our Ticket Vending Machines located within the London Travel Watch area all have the ability to take card payment. Further to this the Ticket Vending Machines at Apsley, Tring and Watford Junction can also retail tickets using cash. We are considering potential mitigations at Berkhamsted, Hemel and Kings Langley in our plan.

18. Please provide details about future arrangements to provide a fixed point at our in-scope stations where passengers can find a staff member for assistance. What will be the queuing arrangements when multiple passengers want help/advice?

We will aim to replicate the focal point of the station by clear demarcations on the station concourse or station entrance. Such is the nature of our estate (61 of the 87 ticket office locations are single window), it is very likely that the focal point will simply be where the ticket office used to be, with the staff deployed outside of the window rather than behind it. Passengers will queue for help/advice as is the current proposition.

19. How will passengers requiring assistance be helped where necessary to reach or leave platforms at times when station staff are not available?

The assistance meeting point is at the ticket office during 'staff help available opening times'. When station staff aren't available, the assistance meeting point is on the platform where your service is due to depart. The ability to pre-book assistance remains available and a member of staff will be deployed in that case.



Appendix A

Ticket sales by sales channel for travel from West Midlands stations

Tables show annual figures for rail industry years (yr ending 31st March)

All figures in thousands

Watford Junction

Watford Junction ticket sales by channel	2018-19		2019-20		2020-21		2021-22		2022-23	
	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total
Ticket Office	237	13.4%	208	11.7%	31	7.2%	99	10.0%	138	10.3%
Ticket Vending Machine	452	25.6%	409	23.1%	90	21.1%	180	18.1%	230	17.3%
Online	403	22.8%	429	24.2%	78	18.2%	271	27.2%	381	28.6%
Oyster PAYG/CPAY	666	37.7%	720	40.6%	228	53.3%	441	44.3%	574	43.1%
Other	10	0.6%	8	0.4%	1	0.2%	4	0.4%	8	0.6%
Total	1,769		1,774		428		995		1,330	

Kings Langley

Kings Langley ticket sales by channel	2018-19		2019-20		2020-21		2021-22		2022-23	
	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total
Ticket Office	101	52.1%	84	46.7%	12	36.7%	36	32.2%	43	28.9%
Ticket Vending Machine	69	35.5%	65	35.9%	12	38.0%	38	34.7%	48	32.0%
Online	22	11.2%	30	16.5%	8	25.2%	36	32.5%	57	38.3%
Other	2	1.2%	2	0.9%	0	0.1%	1	0.6%	1	0.7%
Total	193		181		31		111		150	



Apsley

Apsley ticket sales by channel	2018-19		2019-20		2020-21		2021-22		2022-23	
	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total
Ticket Office	69	38.0%	64	35.0%	12	31.0%	30	25.1%	32	20.4%
Ticket Vending Machine	93	51.0%	86	47.3%	18	47.2%	55	46.2%	68	42.8%
Online	17	9.2%	30	16.3%	8	21.1%	33	28.0%	57	35.9%
Other	3	1.8%	2	1.4%	0	0.6%	1	0.8%	1	0.9%
Total	182		182		38		120		159	

Hemel Hempstead

Hemel Hempstead ticket sales by channel	2018-19		2019-20		2020-21		2021-22		2022-23	
	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total
Ticket Office	285	46.2%	260	43.1%	34	31.3%	104	27.2%	116	23.2%
Ticket Vending Machine	237	38.5%	218	36.2%	48	44.4%	166	43.4%	207	41.6%
Online	86	14.0%	118	19.6%	26	24.2%	111	28.9%	169	33.9%
Other	8	1.4%	6	1.1%	0	0.1%	2	0.5%	7	1.3%
Total	617		603		109		382		499	

Berkhamsted

Berkhamsted ticket sales by channel	2018-19		2019-20		2020-21		2021-22		2022-23	
	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total
Ticket Office	206	38.8%	191	37.0%	23	32.6%	80	27.5%	82	20.5%
Ticket Vending Machine	248	46.6%	215	41.9%	27	37.8%	112	38.3%	149	37.3%
Online	69	13.0%	101	19.7%	21	29.5%	97	33.4%	164	41.2%
Other	9	1.6%	7	1.4%	0	0.1%	2	0.8%	4	1.0%
Total	532		515		70		292		399	



Tring

Tring ticket sales by channel	2018-19		2019-20		2020-21		2021-22		2022-23	
	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total	Tickets	% of total
Ticket Office	153	55.4%	132	49.6%	12	31.1%	32	19.8%	32	14.9%
Ticket Vending Machine	67	24.2%	57	21.5%	12	32.3%	57	35.7%	73	33.4%
Online	50	18.1%	72	27.0%	14	36.5%	70	43.4%	109	50.2%
Other	6	2.3%	5	1.9%	0	0.2%	2	1.1%	3	1.6%
Total	277		267		38		161		218	