

[REDACTED]
[REDACTED]
London TravelWatch
Europoint
5-11 Lavington Street,
Rotherhithe
London SE1 0NZ

Wednesday 27 September 2023

Dear [REDACTED],

Thank you for requesting clarification about the first phase of Southeastern Railway's Consultation on the future of ticket offices ('the consultation'). There has been much coverage of this consultation, and at Southeastern Railway we are, as you are aware, consulting in phases, seeking a good faith consultation – an aim which we know you share. In consideration of that, as we await your substantive conclusions on our phase one consultation, we are grateful for the opportunity to provide you with some more information, which we feel would be helpful. Given our responsibilities, as set out in Schedule 17 of the Ticketing and Settlement Agreement (TSA) - and in the interests of openness - we want to share additional information with you about the following three factors:

- **Quality of service**
- **Availability of retail solutions**
- **Cost effectiveness**

Quality of service

Our intention is to create a better, safer, and more accessible railway.

We want to be clear, there will be more visible colleagues within our stations than there is today. We will continue to have colleagues on hand, during hours that we clearly communicate, to help more customers, in more ways, every day.

We know what customers like about our business is our people, not the bricks and mortar of our ticket offices. We proudly support hundreds of thousands of customers every day getting to the places they need to for leisure, education, and work. We know that our colleagues are central in enabling us to deliver great customer experience.

For these reasons and more we want to highlight three key things:

- **We are not reducing station staffing hours in our proposals**, our colleagues will continue to support our customers with great service.
- **We want to empower our colleagues**, to have the freedom to be more visible to customers, roam the station environment to where they are most needed, and not be

confined behind the glass of a ticket office.

- **We know we have some of the best colleagues in the industry** and to help us keep them, we need to create opportunities for development, offering a range of new skills and challenges, creating fulfilling, varied, and rewarding careers.

Our absolute commitment to improving accessible travel for customers with additional needs and disabilities remains unchanged. In July 2023, The Office of Rail and Road (ORR) published the overall satisfaction scores from customers using Passenger Assist, this is a free service offered by rail companies providing passengers with disabilities, or anyone else who may require help, assistance to enable them to make their journey.

In this independent survey, Southeastern received the highest score ahead of every other operator in the country, achieving 87% satisfaction from our valued customers. We remain incredibly proud of our colleagues who support this service. Noting that over 50% of those surveyed said, they would not have been able to make their journeys without Passenger Assist.

We meet regularly with our Southeastern Accessibility Panel and other community stakeholders to do as much as possible to understand the needs of everyone who journeys with us.

We have also published during the consultation an overarching Equality Impact Assessment (EqIA) and an EqIA for each station subject to consultation. An EqIA identifies the potential impact of a change on people with protected characteristics (such as age, race, or disability).

Our proposals maintain, or enhance, the quality of the service provided to customers with accessibility or additional needs using 'Booked Assist' or 'Turn up and go'.

In terms of retail, during our own review, we analysed customer buying habits at our 40 stations under phase one:

- 15 stations under review, issued on average fewer than 10 tickets a day.
- A further 15, issued between 11 and 25 tickets per day.
- The remaining 10 ticket offices issued between 26 and 50 tickets a day on average.

It is our view that this is not a rewarding or sustainable working environment for our colleagues. Within these stations we also identified colleagues who were already coming out from behind the glass, due to the lack of customer interaction at the ticket office window and have moved themselves into the station environment on an ad hoc basis.

These included: Bromley North, West Wickham, and Hayes, their feedback to us highlighted, that they wanted to increase their visibility and support more customers.

Availability of retail solutions

Our purpose during this consultation is to engage with customers, colleagues, and stakeholders on making more station colleagues available to assist customers face-to-face and continue rolling out popular self-service technology for buying tickets for those who are happy to use it.

The table below shows where our customers will be able to purchase products and ticket types once the proposed changes have been implemented.

Product	Online	Ticket Vending Machines	On Train
Walk-up Singles & Returns	Yes	Yes	Yes
Advance Tickets	Yes	Yes (collection only)	
Flexi Season	Yes	Yes	
Season Weeklies	Yes	Yes	Yes
Season Monthly	Yes		
Season Annual	Yes		
GroupSave & Group tickets	Yes	Yes	Yes
Child fares inc. Kids for a Quid	Yes	Yes	Yes
Rovers & Rangers	Yes		
Excess fares	Yes		Yes
Railcard discounts	Yes	Yes	Yes
Railcard sales	Yes		
Photocards (required with a paper season ticket)	Yes		
Refunds	Yes		
Smartcard fares	Yes	Yes	Yes
Oyster top up (at stations within the London Travelcard area)		Yes	
Seat reservations (for train companies excluding Southeastern)	Yes		
Cash payments (not all stations)		Yes	Yes
Car park tickets & permits	Yes	Yes	

Please note 'on board' where applicable. Additionally, we have a Monday–Sunday 07:00-22:00 Call Centre, which is capable of retailing everything which can be purchased at a ticket office.

We believe it is also important to highlight that within the 40 ticket offices under review within our phase one consultation, that the move to digital for most of our customers is near completion and the numbers of e-tickets journeys is rapidly increasing every week.

Our evidence for these ticket offices under consultation is:

- **Only 4% of journeys** were made following a visit to the ticket office window.
- The stations under review are selling **50 or fewer tickets per day**.
- **Cash usage** for ticket purchase averages **around or below 1%**.
- On average **86% of customers** in our Metro area already **use contactless ways to pay for their journey**.
- All 40 stations are **already enabled for Oyster and Transport for London (TfL) Contactless**.
- Eligible customers also benefit from the use of concessionary **Zip and Freedom pass schemes**.

We are committed to upgrading Southeastern's fleet of Scheidt & Bachmann (S&B) existing Ticket Vending Machines (TVMs), before ticket office closures, to enable customers (who still wish to use them) an upgraded experience, selling tickets from anywhere to anywhere starting in Autumn 2023. Initial upgrades (likely November) will impact mostly ITSO and Oyster transactions, with full implementation available in early 2024.

Since July 2023, Southeastern has made it possible for every journey on our network to be made with an e-ticket (such as New Cross to Hastings) and customers can now pass through gate lines with the barcode tickets on their phone. This is increasingly popular with 250,000 eTicket journeys happening across our network every week. We expect this demand to continue to grow rapidly especially for our boundary journeys. Further information on alternative retail channels is covered at a station level in the Annex B document that was submitted to Department for Transport (DfT) section "Proposed Off-Station/Other Alternative".

In that document, we proposed that products will principally be made available from one of three main channels: a Train Operating Company (TOC) digital channel, a telephone contact centre, a third part retailer's digital channel. In addition, our colleagues will be able to help customers purchase tickets from TVMs or on their own mobile phone.

A breakdown of which products we identified for each channel is shown in this workbook on tab 'Annex B, Alternative Channels'. Where the alternative channels are a telephone contact centre, we envisage that customers will call Southeastern's existing customer service team, with that team being enhanced to provide additional capacity.

Cost effectiveness

At Southeastern Railway, our aim is to deliver a better, safer, and more accessible railway at a lower cost to the taxpayer.

We also want to make sure our railway is sustainable for the future and reduce the costs associated with running the railway, noting that we are a public sector organisation, and our current subsidy is over £1 million a day.

Southeastern is committed to modernising the railway - but our commitment to customers and colleagues will determine how and when we do.

Across our 40 stations it costs a minimum of £122 to staff a ticket office for one shift. On average each station will generate less than £20 retail commission income through ticket sales, demonstrating the continued lack of viability for this retail staffing model at these stations.

To reduce our cost of sales, we want to provide more ways for customers to pay for their journey, for those who are happy to self-serve, and in turn, equip our colleagues, coming out of the ticket offices, to help those who need it, in more ways, every day.

Overall staffing savings can be made within medium and large sized stations without detriment to the quality of service provided. Southeastern is not reducing the times of day stations are staffed in these proposals or the availability of facilities. In fact, five stations will be restaffed as current vacancies are filled by placing our people where they are most needed. These stations are Eden Park, Sundridge Park, Belvedere, Lower Sydenham, and New Beckenham.

In summary, we believe that our proposals for the closure of 40 ticket offices in our Metro area are compliant with Schedule 17 guidance in the Ticketing and Settlement Agreement (TSA).

Phase one consultation feedback from London TravelWatch

Phase one of the consultation, which concluded on 1 September 2023, sought feedback on making changes in 40 ticket offices on the 'Metro' part of our network, where we issue on average, fewer than 50 tickets daily (and only 4% of tickets are purchased at a ticket office window).

We were pleased to hear from you, that London TravelWatch had received over 17,000 responses and these are still being processed, but the public feedback gathered highlighted:

- **Easy and widespread availability of rail tickets.**
- **Provision of assistance for customers with accessible travel needs.**
- **Prevention of 'unfair' penalty fares.**
- **Availability of station facilities.**
- **Safety and security.**

We welcome the opportunity to share our feedback on these points raised by our customers with more detail below.

Easy and widespread availability of rail tickets.

Our section earlier in this letter (Availability of retail solutions) addresses these concerns. In summary, there will be more visible colleagues within our station than there is today. We will continue to provide a range of options for customers to buy tickets, before they board a train. In Autumn 2023, we will be updating our existing ticket machines to enable customers to buy a ticket to anywhere from anywhere in the country.

We believe that within the 40 ticket offices under review within our phase one consultation, that the move to digital for most of our customers is almost complete, as evidenced earlier in this letter. On average, every week over 250,000 eTicket journeys are happening across our network.

Provision of assistance for customers with accessible travel needs.

Our absolute commitment to improving accessible travel for customers with additional needs and disabilities remains unchanged.

We are proud of our Southeastern colleagues, who supported 55,975 'Passenger Assist' bookings between April 2022 and March 2023 compared with 24,781 in the previous year. Receiving an 87% satisfaction rating (highest in the country) in March 2023.

We have published an overarching Equality Impact Assessment (EqIA) and EqIA for each station subject to consultation (both documents are also available in large print, easy read, braille, and British Sign Language video) – to clearly show what we are doing to protect the interests of people with accessibility requirements, as part of this process.

An EqIA identifies the potential impact of a change on people with protected characteristics. For example: Ladywell station is 5-10 mins walk from University Hospital Lewisham, or Shortlands station proximity to a Special Educational Needs (SEN) School. Training will be provided for station staff, including our former ticket offices colleagues, in safeguarding and supporting customers with additional needs. We have been mindful that we will continue to have colleagues on hand, during our advertised staffed hours, to help more customers, in more ways, every day.

Customers who may require additional support, such as a person with a visual impairment, will be directed to our newly designated Meeting Points, which will have clear and understandable directional signage, throughout the station, and will be located at a convenient place after consultation with our accessibility panel. At the Meeting Point if a colleague is not present, customers can use one of our Help Points to make themselves known, so that our colleagues can be directed to assist. Help Point calls go through to our control centre, which is staffed 24/7. Control centre staff can contact a member of station team directly and direct them to assist the customer at the Help Point. Each Help Point will also have a unique QR Code, which customers can access via their mobile phone and will directly take them to Southeastern's WhatsApp messaging service, enabling them to be connected to one of our specialist colleagues who can arrange assistance. WhatsApp gives our customers who may want additional privacy, or have a hearing impairment, another channel to contact us at the Meeting Point.

We continue to review our plans with our Southeastern Accessibility Panel and other community stakeholders to ensure that the practical details of these solutions are well designed and implemented.

Prevention of 'unfair' penalty fares.

Our approach to revenue protection is as follows:

- Make it as easy as possible for passengers to buy a ticket.
- Increase the probability that we will check that ticket.
- Treat people appropriately if they do not have a ticket.

Our revenue enforcement teams are trained to ensure that penalty fares are only used where appropriate, and the needs of customers with accessibility requirements are always considered.

The National Rail Conditions of Travel (NRCoT) Railways (Penalty Fares) Regulation, National Byelaws are clear around the requirements to buy a ticket. However, no one can be penalised if there were no facilities to do so, notices indicating that purchase is not needed, or a person was told by an Authorised Person that they may board without a ticket.

Availability of station facilities

In our phase one consultation, for the 40 ticket offices under review, we are not proposing to withdraw or reduce the hours of our colleagues or limit the availability of our station facilities - waiting rooms and toilets where available will remain open at the current times.

The availability of key station facilities is shared with our customers in real time via our website and app.

If ticket office closures are approved, we will work with Network Rail to repurpose these spaces into additional station facilities, such as retail or community use.

Safety and security

We want to highlight that almost all 40 stations under review in our phase one consultation have live CCTV, which can be viewed by the Kent Integrated Control Centre (KICC), which is

staffed 24/7.

All 40 stations also have Help points, which are fitted with remote monitoring capacity, which constantly runs checks on the connectivity between the Help Points to the KICC. All Help Points will be upgraded to have stronger connections with our control centre before any ticket offices are closed. Help point calls go through to our control centre, which is staffed 24/7. Control centre staff can also contact members of our station team directly.

We have met with the British Transport Police (BTP) and briefed them on our plans and our approach to the proposed ticket office closures. We discussed the impact on our colleagues and how they would be supported through additional training courses and safety related equipment provided, such as radios or body worn video.

We have gathered the BTP's views on our proposed training plans. It was noted that there are also Trades Union consultations happening alongside the public consultation, where we will ensure that safety and security are rigorously evaluated in the implementation of any changes and that all station staff have access to a place of safety on every station.

We have launched a Safeguarding Strategy to protect our customers, our colleagues, and the public in the communities we serve. As part of our proposal, former ticket office colleagues will receive Safeguarding training and be better placed to identify and support people who may be at increased/higher risk of self-harm, deter anti-social behaviour and report crime.

We have made a tri-partite agreement between Southeastern, Network Rail and the British Transport Police to further improve safety and security on our network. Risk assessments will be provided for each station taking cognisance of local crime statistics at each location. BTP have welcomed our retention of staffing hours and the use of security staff who have been deployed on our network.

It is positive to note that if ticket offices close, gatelines will be closed for longer in the Metro area deterring anti-social behaviour and reducing ticketless travel on our services. For example, at Falconwood station the gates are proposed to be closed for an additional two hours a day.

BTP have requested that if Southeastern look to repurpose any ticket offices, that opportunities are taken to design out crime. They also raised the benefits of including security requirements within contractual arrangements with new tenants.

We will continue to work closely with the BTP on all matters around safety and security. The BTP expressed the view that our proposals for the future use of our estate are community focused in design.

In conclusion

It is our belief that our proposals for the closure of 40 ticket offices in our Metro area are compliant with Schedule 17 guidance in the Ticketing and Settlement Agreement (TSA).

- Due to vacancies, within these stations, we are currently not able to fully comply with Schedule 17 opening hours. In practice, this has led to 58 complaints in the last year at these 40 stations.

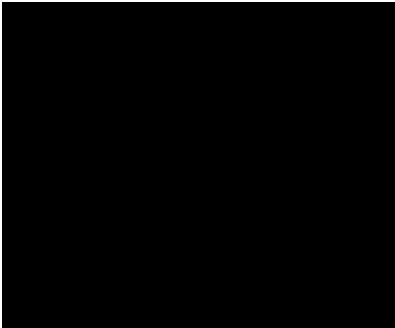
- Our phase one consultation proposal will enable us to create a more consistent and sustainable staffing model, moving our people to where they are most needed.
- By systematically closing these ticket offices, training, and equipping our colleagues, and introducing measures such as designated Meeting Points or upgraded Ticketing Vending Machines, in our view a better, safer, and more accessible railway can be provided.
- We know we have some of the best people in the industry working for us and to help us keep them, we need to develop our colleagues by giving them the range of skills they need so that they can have fulfilling, varied and long-term, sustainable careers.
- Any vacated ticket offices can be repurposed for retail, community, or operational purposes if permission is granted to close them.

Given the above we kindly ask for your endorsement of our proposals. To assist further with your evaluation, please find attached our answers to the detail you requested.

Next Steps

We look forward to seeing you on Friday 6 October 2023, and extend an invitation of welcome for you, or any member of the London TravelWatch team, to visit any of our 40 stations under review within this consultation, to speak to our colleagues first-hand.

Yours sincerely,



CC:

