

* London TravelWatch

6 September 2023

[redacted]

South Western Railway

(sent via e-mail)

Dear [redacted]

South Western Railway's Proposals under the Major Change Process of the Ticketing and Settlement Agreement (TSA)

I am writing on behalf of London TravelWatch in response to SWR's proposals to close ticket offices at 67 stations on your network in our geographical remit.

As you'll be aware, the public consultation period has now ended and London TravelWatch has received more than 180,000 responses in total. We are continuing to process these and 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 SWR'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.

1) Easy and widespread availability of tickets

As part of any proposals, customers must be able to buy the ticket they need for their journey in an easy and timely way. However, we and the public question whether 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

Although increasing numbers of passengers are switching to purchasing tickets online rather than at the station, not everyone is able to use these methods to buy their tickets if, for example, they don't have internet access or the tools are not accessible. In research from earlier

this year (see note 1), one in six people told London TravelWatch that they have been unable to buy a ticket as they can't use or don't have access to a smartphone or internet connection - the equivalent of more than 1.5 million Londoners.

Note 1: Left Behind Londoners - Digital Exclusion and Disadvantage in London transport: <https://www.londontravelwatch.org.uk/campaigns/digital-exclusion/>

Even when someone has access to digital channels, many people have told us the complexity and variety of ticket options available means they do not feel able or confident enough to book their tickets without assistance from staff. Without evidence to the contrary, we must assume that many of people will continue to want advice and support at the station and not migrate to digital channels.

Although we have been provided with sales data from SWR's ticket offices, we do not have details of existing sales and ticket collection data for TVMs. And so, we cannot yet determine if there will be sufficient capacity at TVMs to meet the retail capacity needed if ticket offices close, particularly at stations where ticket office sales are relatively high and especially at peak hours such as Staines and Surbiton. We also note that SWR propose to reduce the number of TVMs at some stations, with some stations either proposed to only have TVM or retaining only one TVM. If TVMs cannot cope with the additional demand there is a risk of passengers being faced with unacceptable queues to purchase tickets, which could lead to increasing instances of them missing trains or boarding without any ticket.

Usability, functionality and accessibility of TVMs

You have provided information about the range of products and services which would be available at stations as an alternative should the ticket office be closed. SWR's TVMs do not offer the same range of products and services as ticket offices, with tickets including Advance tickets, car park tickets, Rovers and refunds not available. We are also currently seeking clarification as to whether season tickets (longer than weekly) and railcards will be available on all TVMs as there is contradictory information about this in different parts of the proposal documentation.

Even where tickets are available on a TVM, the TVMs themselves may not be accessible for all passengers to use. For example, they may not be at the right height for wheelchair users. The visually impaired and blind community have found the touch screens inaccessible. TVMs can also be hard to see if they are placed outside in the line of direct sunlight or receive glare from indoor lighting. If staff assistance to purchase a ticket from a TVM is not available at the station - or perhaps via remote/video assistance - passengers, in particular Disabled passengers, will find it harder to purchase a ticket before they board the train.

Many passengers find TVMs difficult to use, including being slow to work and confusing to navigate, with a range of different fares for the same journey, with different restrictions for different times.

It is also not uncommon for TVMs to be out of order, which can result in longer queues at the remaining TVMs. If the ticket office is closed and the only TVM at a station is not working (as noted, some SWR stations only have, or will only in future only have, one TVM), passengers will be unable to buy a ticket. An increased reliance on TVMs makes it even more important that they are monitored and maintained, as well as kept clean to ensure the touch screen keeps working.

Your sales data shows a significant proportion of tickets sold at some ticket offices still being purchased with cash. You have advised that every SWR station in our area has at least one TVM which accepts cash; this will need to continue to be the case for those stations which would in future only have one TVM. It is important, though, that even on the TVMs which provide the option to pay by coins or notes, that this remains available every day because we know there are times when issues with TVMs mean that this option is not available even at times when paying by card is still possible.

We are mindful of current standards for queuing times (3 minutes in the off-peak and 5 minutes in the peak) but these apply only to ticket offices and not TVMs. It would be as unacceptable for a person to miss a train while queuing at a TVM as it would be if queueing at a ticket office.

We know that many passengers find the fares system complex and confusing, which leads to uncertainty when confronted by the multiple ticketing options on TVMs for the same journeys. Where staff are removed altogether or their number substantially reduced (as SWR propose for non-Category 1 stations such as Earlsfield and New Malden) or where they will in future have multiple duties, it will make it harder for passengers to receive specialist advice or support from staff to make a ticket purchase.

Even where staff will still be present, there are questions about whether they will have sufficient expertise to help passengers navigate the complex fares system. Many passengers will need support to use the TVM and to be advised about which ticket they should buy. But information you have provided shows that of the three multi skilled staff roles (Gateline, Platform and Front of House), only the Front of House staff will be able to help with ticket retailing.

2) Providing assistance to travel in a timely and reliable manner

We know that passengers value staff at stations. This is not just with selling tickets but also in relation to safety and security, and in providing information, advice and support especially during times of travel disruption.

SWR's proposals to reduce the number of staff, or remove them entirely at times, presents an unacceptably detrimental impact on customer service for passengers, making it harder for them to access advice, support and information from staff at these times.

The consequence of the proposals is that many stations will no longer have staff for significant periods during which ticket office staff are currently present, usually from after the end of the morning peak. We calculate that at 21 of SWR's stations in our area staffing hours would reduce by more than two hours on some days. At stations such as Esher, Hampton and West Byfleet the reduction will be more than seven hours on some days.

We calculate too that at 41 of SWR's stations in our area (all but one of which are category 3 stations) it is proposed that they would in future be staffed on one or two fewer days than at present, between Friday and Monday.

It is true that not every station would see reductions in staffing numbers or the number of hours or days at which they are staffed, and some stations will gain staff on days when there is currently no staffing. But at other stations, such as Mortlake, Teddington and Worcester Park, the proposals would lead to an unacceptable cumulative impact. At those stations, days when they are currently staffed will

become days when become completely unstaffed; and on those days for which they will be staffed, it will be by fewer staff who are available for fewer hours.

Even where it is proposed to maintain a staff presence, the number of staff available at many stations would be reduced, with the ticket office staff role at stations (such as Twickenham and Kingston) not being replaced with the new Front of House role found at other stations. We are concerned that under these proposals staff availability will be reduced at many stations, which in turn may mean that support for passengers will be stretched too thinly.

We have concerns too about other whether staff in multi-skilled roles will have both the necessary specialist advice to meet the needs of all passengers and balance the multiple functions, rather than just retailing, which they have been asked to perform.

We note that a guard is available on every SWR service and that they may be able to assist passengers on and off the train. However, they would not be able to help with other assistance such as accessing the station entrance from street level and help with purchasing tickets.

SWR have committed that 'All single staffed stations will now have colleagues out and about in the station to help with retail choices and other customer needs.' But we are concerned that, should the staff member be on a platform or at a gateline which is not close to the ticket hall area or station entrance, passengers, especially Disabled passengers, may find it more difficult (or impossible) to find and get help from staff.

The impact will be exacerbated for those stations where it is proposed that there will be no staff at all at certain times of the day or for whole days. It is unacceptable to expect passengers to have to travel to another station instead of their local one or to have to wait at their local station for assistance because SWR have made the decision to remove staffing from that station at a particular time or for a particular day. This would appear to threaten the continuation of Turn Up and Go at many stations.

We ask how passengers will in future be able to find redeployed staff at stations. Whilst the theory is that they may be more visible outside of a ticket office, the reality may be that they are 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 when several people want help at the same time and what queuing arrangements will apply. This is relevant for all passengers, but especially Disabled passengers and other passengers requiring assistance.

We understand that station help points may be used to mitigate these issues, and indeed passengers are likely to be more reliant on these to obtain assistance and information if a ticket office at a station closes. But we have concerns about their operation and reliability, with research by the Office of Rail and Road (see note 2) identifying a number of issues with their use. The report suggested that it may be difficult for Disabled passengers to have confidence in boarding a train if they request assistance from a help point at an unstaffed or partially staffed accessible station.

Note 2: Accessible Travel Policy Implementation Review of unbooked assistance and Help Points:
[accessible-travel-policy-implementation-review-july-2022.pdf](#)

During the consultation period, SWR provided an overarching Equality Impact Assessment (EqIA) which gave useful information about the impacts of the proposals on passengers and their developing thoughts and actions around mitigations. This included the possibility of providing remote access to some station facilities and the provision and location of hearing induction loop facilities, although this thinking appears to be in the early stages of development.

However, SWR did not provide station specific EqIAs but instead a range of data about passenger assistance levels across the SWR network. This gave a base level of information but was insufficient to allow us to begin to assess the impacts of the proposals on a station by station basis, especially the safety and security issues, and any proposed mitigations.

3) Preventing unfair penalty fares

As mentioned above, proposals to remove ticket offices that rely on TVMs that are not fully accessible, do not sell the full product range and/or do not accept cash will mean more passengers are unable to buy the ticket they need before they board the train.

SWR's proposal will mean that some passengers, especially those who either cannot use digital or have chosen not to use digital, will have to travel out of their way to buy products that are only available at the largest, category 1 stations. This is even though - calculating from SWR's figures - roughly one in five journeys don't travel through a category 1 station, such as those from Kingston to Shepperton. This goes against the Rail Delivery Group's pledge that 'Customers will never have to travel out of their way to buy tickets.'

SWR states that ahead of implementation there will be a way for customers to buy a ticket that allows them to get to a category 1 station to purchase the ticket they require for their journey 'without being out of pocket.' But this does not take into account the inconvenience and difficulty that this additional journey will cause many passengers, especially those who may have accessibility issues, as well as the sense that they are being disadvantaged through no fault of their own. Given this, it is crucial that all passengers are clearly made aware that they can board a train without a ticket and be confident they will not be penalised if they do so. There are concerns that if introduced these passengers will be relying on the good will of train staff to not issue them a penalty fare, and questions of 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, so 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 destination.

4) Availability of station facilities

It is crucial that access to vital station facilities including lifts, waiting rooms and toilets be maintained at stations, even when staffing hours or staffing numbers have been reduced. This would worsen the customer experience, particularly for Disabled people and those in more vulnerable situations, for example a solo traveller at night without access to a waiting room.

From the information you have provided, access to these vital facilities including toilets, lifts and waiting rooms will be reduced at many

stations where staffing hours are also proposed to reduce. SWR's EqIA explains that they are looking into providing remote access some station facilities in the absence of staff at stations but this mitigation appears only to be at an early stage of thinking.

5) Safety and security

Proposals which reduce, redeploy or remove staff presence at stations risks making passengers feel less safe. Passengers are concerned about anti-social behaviour and crime at stations, and fear that it will worsen if fewer are staff present, particularly in the evenings. Under SWR's proposals, some stations will no longer see staff in the evenings, which we see as another significant concern.

We note that the British Transport Police have informed us that an extensive programme of Safety, Security and Vulnerability risk assessments need to be completed and mitigations agreed before any proposed changes are implemented.

6) Other issues

Other issues have also emerged during the consultation process:

Future changes

The public consultation feedback 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. Staffing is clearly a crucial part of supporting people to use the rail network. We seek reassurance on this key concern. An alternative regulatory mechanism covering station staffing could provide significant reassurance to passengers and stakeholders on this 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 mindful that some of your stations also serve trains run by other train companies, and so your proposals will impact the support offered to their passengers.

Cost benefits

There are questions as to whether proposals to close ticket offices will actually be cost negative, costing the railways money. While running costs may be lower, if people are deterred from using the rail network because of the issues we have raised above, 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]

Appendix - Clarification questions

1) Easy and widespread availability of tickets

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?
- * Have you assessed who will not / cannot move to digital and the effect on them of closing the ticket office?
- * Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?
- * 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 (including at stations which won't have staff with access to handheld devices to sell tickets directly)?
- * What KPIs will be in place at stations to monitor and report the adequacy of retail arrangements at stations (including to passengers)?
- * 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 TVMs

- * Which products are not available from your TVMs? This should include not only tickets but also things like reservations, concessions and discounts, tickets for travel that do not involve the 'host' station, use of vouchers and warrants, and tickets for connecting services (e.g. Plus Bus tickets).
- * How will passengers access products and services not available at the station in future?
- * Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?
- * 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 can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets.
- * 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?
- * Have you made any specific assessment of the ability of TVMs to cope with the increase in cash, especially at stations where there is a higher than average use of cash to purchase tickets?
- * Are the TVMs which accept cash in an accessible location? e.g. can they be reached from all platforms, and if TVMs are in multiple locations is it clear where cash ones are?
- * If a person cannot pay by cash at the station what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?
- * 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?

2) Providing assistance to travel in a timely and reliable manner

- * 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?
- * 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?
- * If the mitigation is a mobile team how long will people have to wait? If you currently use mobile teams to provide assistance do you have any evidence on their effectiveness (e.g. time taken to arrive, passenger satisfaction)
- * If the mitigation is to provide an accessible taxi what processes will be put in place and what is your assessment of the adequacy of this compared with travel by train?
- * What monitoring regimes will be put in place to measure time taken and reliability?
- * 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 to replicate the ticket office/window and 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?
- * 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/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?
- * 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?
- * How will other information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information and bus timetables etc?
- * How will staff be able to give people journey itineraries and other printed info?

3) Preventing unfair penalty fares

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

4) Availability of station facilities

- * 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?

5) Safety and security

- * 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?

6) Other issues

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 and Network Rail

- * What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?
- * Have you engaged with Network Rail about the impact where the changes are proposed at Clapham Junction and Waterloo? Are any mitigations planned?

Cost benefits

- * 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?

Evaluation

- * What, if any, plans do you have to monitor and evaluate these changes should the proposals go ahead? What KPIs would you be using as part of this?

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

- * London Living Wage Employer