6 September 2023

████████████

████████████████████████

Southeastern

(sent via e-mail)

Dear ████████

Southeastern's Proposals under the Major Change Process of the Ticketing & Settlement Agreement (TSA)

I am writing on behalf of London TravelWatch in response to Southeastern's proposals to close ticket offices at 40 stations on your network in our geographical remit.

As you will 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 Southeastern's proposals, and their ability to meet these criteria. We have outlined these below, along with 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 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. For example, if they do not have internet access or the tools are not accessible. In research from earlier this year, one in six

London **TravelWatch** Europoint 5-11 Lavington Street London SE1 0NZ Telephone: 020 3176 2999 www.londontravelwatch.org.uk

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

people told London TravelWatch that they are 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.[1] Even when access to digital channels is available, many people have told us the complexity and variety of ticket options 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 people will continue to want advice and support at the station and not migrate to digital channels.

Where passengers can buy their tickets from a Ticket Vending Machine (TVM), we have questions about TVM's ability 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. This presents the risk of customers facing significant queues to purchase tickets.

If TVMs cannot cope with the additional demand, passengers may being faced with unacceptable queues to purchase tickets, which could lead to increasing instances of them missing trains or boarding without any ticket. According to the information you have provided, three-quarters of your stations in the scope of this consultation each have only one TVM.

In addition, we do not know Southeastern's existing TVM usage (both sales and ticket collections) to determine whether there is sufficient capacity to absorb this level of sales.

We are mindful that there are currently standards for queuing times (3 minutes in the off-peak and 5 minutes in the peak) but they only apply 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.

Usability, functionality and accessibility of TVMs

You have provided us with details of the range of products and services which would be available at stations as an alternative should the ticket offices be closed. We note that products such as Railcards, refunds and Rovers will not be available to purchase on TVMs, with, it appears, no alternative method at stations to provide these products. If ticket offices were to close this would represent a decrease in station retail capability, which will stop some people buying the ticket or service that they need.

Even where tickets are available on a TVM, the TVMs may not be accessible for all passengers to use. For example, they may not be at the right height for wheelchair users, whilst there are concerns from the visually impaired and blind community that they find touch screens inaccessible. Some TVMs are also very difficult to use for visually impaired people 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 responses from the public have noted that they find TVMs difficult to use, including being slow to operate and confusing to navigate. Others noted that it is not uncommon for TVMs to be out of order, which can result in longer queues at the remaining TVMs or even an inability to buy a ticket at all if the only TVM at a station is not working and the ticket office is closed. An increased reliance on TVMs makes it even more important that they are monitored and maintained, as well as kept clean so that the touch screen keeps working.

Your sales data shows that a significant proportion of tickets sold at some ticket offices are still purchased with cash. You have also advised that cash TVMs are present at all your stations in our area except Brixton and Knockholt. It is important, though, that even on the TVMs which provide the option to pay by coins or notes, this remains available every day because we know there are times

---

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

when issues with TVMs mean that this option is not available even at times when paying by card is still possible.

Whilst we understand that under your proposals many staff at stations will be able to help people buy the right tickets at TVMs, where there are changes in the number or responsibilities of staff, including becoming multi-skilled, it will make it harder for passengers to receive specialist advice or support from staff.

In contrast to many other self-service retail situations, many passengers will need support not just to use the TVM but also to understand what they should purchase. You are planning to install over 100 additional touchscreen ticketing machines 'which will be as easy to use as the digital screens' in other food industry locations. We hope that the input from accessibility groups will be sought before procuring these new machines. It is also the case that trying to buy a ticket from the complex rail fares system – and being assured that you have purchased the right ticket at the right price – can be a very different experience from elsewhere in retail where there is only one price per specific product and the prices do not alter depending on when the purchase is made.

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

We know that passengers value highly 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 disruption. However, we are concerned that under your proposals some staff availability will be reduced, which in turn may mean that support for passengers will be stretched too thinly. This particularly relates to the impact that this may have on accessibility and the ability of Disabled people to travel by train, especially the ability to 'Turn Up And Go.'

From the information which you have provided us, it appears that some stations will have fewer staff at certain times. For instance, at Albany Park and Elmers End, the two Ticket Office staff will be replaced by one Host. Unlike at present, there will in future be no staff retailing capacity at these stations on weekdays for more than six hours from early afternoon once the Host is no longer on shift.

A snapshot of the current staffing of Southeastern's ticket offices provides a striking contrast to the promises of future staffing. Based upon the live station information page on Southeastern's website, we checked the availability of ticket offices on two separate days last month. It showed on 15 August that the ticket offices at 22 of the 40 stations were either closed when they were due to be open or would be closing earlier than scheduled. On 22 August this was the case for 21 stations.

A key issue for passengers is how they will 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. Passengers currently 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, e.g. some guide dogs are trained to go to the ticket window, and there are induction loops to help people hear. Passengers must have an easy to find place to find staff.

There should also be a simple way for people to know the order in which they will get assistance if there is no queuing system, to provide clarity and assurance to people that they will be helped and avoid potential conflict. This is relevant for all passengers, but especially Disabled passengers and others requiring assistance. This is particularly important in times of service disruption.

We understand that station help points may be used to mitigate these issues, with passengers likely to be more reliant on these to obtain assistance and information if a ticket office closes. But we have concerns about their operation and reliability as research by the Office of Rail and Road [2] identified a number of issues with their use. The report suggested that it may be difficult for Disabled passengers

---

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

to have confidence in boarding a train if they request assistance from a help point at an unstaffed or partially staffed accessible station.

Specifically in the case of induction loops currently installed in ticket offices, you suggest that an alternative for staff in future is 'to seek out a quiet area, with limited background noise' but we ask how practical and effective this is as a mitigation.

3) Preventing unfair penalty fares

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.

Southeastern proposes the creation of Travel Centres at 14 of their busiest stations, which will provide all ticket selling facilities currently available at a ticket office. Passengers who wish to buy a ticket that is no longer available at their "local" station are advised to travel to one of these to make their purchase. An example of the impact of this, which gives us great concern, can be seen in the station by station Equality Impact Assessment (EqIA), where passengers on the Hayes branch are advised to use the full retail facilities at the Travel Centre in London Bridge, which is 35 minutes away by train (not including the time to wait for the train to arrive). This goes against the Rail Delivery Group's pledge that 'Customers will never have to travel out of their way to buy tickets.' There are other examples we have identified under the new Travel Centre concept whereby passengers will need to travel out of their way to find a staffed ticket office.

In terms of being able to even reach a Travel Centre, the station by station EqIAs do not note that some stations (such as Chelsfield) only have a degree of step free access and this limited level may exclude some passengers from getting to the Travel Centres at all. So, whilst the Chelsfield EqIA directs passengers to step-free Sevenoaks, accessibility to the Sevenoaks-bound platform is limited.

In response to the question of how passengers will get a ticket to make the journey to the Travel Centre, your overarching EqIA says the 'rail industry is exploring' how this will be achieved. Under the proposals, passengers unable to buy a ticket at their origin station are told to buy it at the first available opportunity, either on board or at their destination. It is quite right that you have raised this as a higher expected impact in the overarching EqIA.

Given these proposals, 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 passengers will be relying on the goodwill 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, such as a solo traveller at night without access to a waiting room.

From the original information you have provided, Southeastern will, in future, keep facilities available to at least the same times (and sometimes longer) that they are currently. However, on the overarching EqIA it is only stated that 'station facilities will remain open.' We seek clarity on this so we can fairly review this aspect of the proposals.

5) Safety and security

Proposals which reduce, redeploy or remove staff presence at stations risks making passengers feel less safe. Passengers have concerns about anti-social behaviour and crime at stations, and that they will get worse if there are fewer staff present, particularly in the evenings. Southeastern are not proposing to reduce the hours which stations are staffed – and in some cases restaff stations currently unstaffed. However, some stations will remain unstaffed in the evening and some will have no staff at all on Saturdays or Sundays.

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 which have 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 that 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 TfL and other train companies, and so your proposals will impact the support 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

London TravelWatch

Appendix - Clarification questions

1) Easy and widespread availability of tickets

Adequacy of retail facilities

- Do you have any evidence showing 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, 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 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 where staff won't have handheld devices to sell tickets directly)?
- What impact is there on impartial retail obligations, which 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? 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 you 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?
- 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
- What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?

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?