

* London TravelWatch

31st October 2023

[redacted]

Southeastern

(sent via e-mail)

Dear [redacted]

Southeastern proposals to close ticket offices under the Major Change Process of the Ticketing and Settlement Agreement (TSA)

I am writing to you in response to Southeastern's plans to close ticket offices at 40 stations where Southeastern is the lead retailer and which fall within our geographical remit, as part of a wider programme of industry reform.

We have been analysing the information provided to us as part of the TSA process, including the Major Change template spreadsheet, your letter of 27th September in response to our letter of 6th September (attached in Annex 1 and 2 respectively), and other supporting documents. We are grateful to you and your colleagues for responding to our queries throughout the process through email and via Teams meetings, which have also helped inform our decisions.

As you know, we have also conducted a public consultation on the proposals put forward by Southeastern and eight other operators in our area. The extended public consultation period closed on 1st September and during that time we received 232,795 responses in total. 19,918 of these responses were specific to Southeastern. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

We understand the main changes being proposed by Southeastern are as follows:

- * The closure of ticket offices at 40 Southeastern stations in the London TravelWatch area. Each of these stations currently sell fewer than 50 tickets at the ticket office window daily and already allow for passengers to use Pay As You Go for their journey

- * A redeployment of Southeastern ticket office staff at all stations. At the stations where there is currently a sales member of staff, there will in future either be a Customer Experience Host (defined as either Host or Platform), who will provide ticketing and other assistance. Gateline staff will also provide ticket assistance by exception

- * Overall station staffing hours will not be reduced, albeit with limited exceptions to this at a couple of individual stations. We have calculated that the number of staff at many stations will be reduced on some days

* Five of the 40 stations (Belvedere, Eden Park, Lower Sydenham, New Beckenham and Sundridge Park) will be restaffed due to the filling of current vacancies

* Staff will have handheld ticket machines at all 40 Southeastern stations which will be able to retail the same tickets as are currently available at a ticket office

* Travel Centres at seven of Southeastern's busiest stations will retail a full range of tickets and products

* Station facilities will remain open at the same times as currently

* If approved, Southeastern do not expect to implement their proposals until early 2024.

Public response to the changes

During the consultation period London TravelWatch received a total of 232,795 representations via email, freepost and phone (see note 1). These were a combination of responses to individual stations, specific train operators (TOC), and to the proposals across all companies and stations. Of these, 231,471 (99%) were objections. 51,853 responses objected to all changes across the rail network.

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

There were specific campaigns which generated a large number of responses including template emails and post. While the majority of these responses followed the standard text, some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received postal petitions with a total of 15,923 signatures generally objecting to ticket office closures. We also received copies of the following online petitions:

Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>

Megaphone - <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices>

We are also aware of the following online petitions:

Parliament - <https://petition.parliament.uk/petitions/636542>

38degrees - <https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition>

We received a survey report from 38 Degrees with 26,194 responses objecting to the changes nationally.

We received many responses from stakeholders including MPs, local authorities and representative organisations.

Southeastern received 19,918 responses specific to their stations. Of these 19,873 were objecting to the proposals. Objections were received for all the stations Southeastern put forward proposals for. We also received 5 petitions for Southeastern specific stations. A station-by-station breakdown of responses can be found in Appendix 1.

The top three issues in these responses were concerns over the ability to buy tickets in future (including needing staff to help them navigate the complexities of the fares system and difficulties in using TVMs), the provision of information needed to plan journeys (including during

periods of disruption) and how passengers requiring assistance would receive help and support. Throughout the responses the importance and value of staff in delivering these services and support was highlighted time and again.

It is important to note that these are the number of responses to the consultation and not the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area - it was not a national consultation. Therefore, it was possible for people to choose to respond to multiple stations and/or TOC consultations.

Our role under the TSA

London TravelWatch has a formal role in assessing Major Changes to ticket office opening hours. If a train company wishes to make such a change it must follow the process set out in the TSA.

Under clause 6-18 (1) of the TSA, changes to opening hours of ticket offices may be made if:

- a. the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and
- b. members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

London TravelWatch may object to a proposal on the grounds it does not meet one or both of these criteria. To assess this, we have reviewed the following factors which we have derived from section 5 of the Secretary of State's TSA ticket office guidance (21 February 2023):

* Quality of service. This includes the number and skills of station staff and hours deployed, availability of facilities like toilets, waiting rooms and lifts, and provision of information such as wayfinding, routes, and during disruption.

* Access to products. Can passengers easily buy the right ticket for their journey? This includes the product range available at the station and off-site, support to get the ticket including advice on the correct fare, and retail capacity. Passengers should also be confident that if they have to travel without a ticket (for example if it's not available at the station) then they will not be unfairly penalised.

* Accessibility. Passengers needing assistance should receive this in a timely and reliable manner. This includes arrangements for booked assistance, the ability of passengers to 'turn -up-and-go', the ease of requesting assistance, the ability to pay by cash or card, and the accessibility of ticket purchasing methods including ticket vending machines (TVMs) and non-digital options.

* Safety. This includes both perceived and actual security, access to help if needed, and support if there is a safety issue.

* Future monitoring. How will train companies ensure that changes are working well for passengers? In addition, what, if any, protections are in place to ensure that, where appropriate, passengers are consulted on future major changes to staffing?

* Cost effectiveness. Do the financial benefits outweigh any costs that the changes may incur, including through funding mitigations or any potential loss in revenue?

We have also considered generic issues and mitigations where in our view they are material to assessing the proposals against the factors.

Our assessment of the proposals

London TravelWatch understands how Southeastern's proposals could be good for passengers. In principle, we support the more flexible use of staff to better help passengers at stations. By making staff more visible and accessible, it should drive higher rates of customer satisfaction and lower the costs of selling tickets to support a more financially sustainable railway for the future. This approach is particularly sensible for stations which are now seeing low sales at their ticket offices.

However, the key question for London TravelWatch to consider is whether the detail and supporting evidence provided is strong and robust enough to give us the reassurance that we need that an improvement in passenger experience will begin as soon as Southeastern's proposals are implemented.

We share the view expressed recently by the Transport Select Committee that it is "perplexing" that the rail industry has put forward proposals before the promised simplification of fares and ticketing has been delivered. Part of the reason why passengers value the presence of ticket office staff is because, for some, they are an essential source of advice in buying the best ticket for their journey. That arises from the perceived complexity of today's rail fares and the fear that passengers may not be getting the best deal for their travel. We believe that closing ticket offices should happen after fares reform has taken place and shown to be a success.

Nevertheless, we have considered carefully the results of the public consultation on your original approach and, together with our own analysis of the proposals themselves, we have come to the following views on the aforementioned six factors.

Quality of service

Our focus under this category is on the potential impact of staffing hours and staffing levels at Southeastern's stations.

Southeastern's proposals state that there will be more visible staff within stations than today to help more customers in more ways, every day.

The current station staffing model will be changed under Southeastern's proposals. The new Host role will have comparable ticketing sales and knowledge as current sales staff and be mostly based in the concourse or station entrance. Although named Platform, staff in this role will also be mostly based in the concourse or entrance to the station and will have some ticketing knowledge to assist at TVMs.

Gateline staff will also have some ticketing knowledge to assist at TVMs. They will have a static role but will, when required, open the gates to assist in other parts of the station. Southeastern have advised that where previous sales roles are now covered by Platform positions, this is due to the low sales at these locations and adapting to the current and future need at these locations.

Southeastern have said that all staff will receive increased ticketing training to assist customers using TVMs. However, having reviewed the

proposed allocation of staff across these roles, we have observed the following:

* at 25 of the 40 stations there will be no Host role, with ticket retailing being offered here by staff who will have a reduced level of ticketing expertise

* of the 15 stations who will have Hosts, only two (Blackheath and Kidbrooke) will have a Host present every day. The staffing profile for the remaining 13 stations show that Hosts will be just part of the overall staff presence.

We recognise the benefits of having staff more available and on-hand to help, and that the changing nature of sales and transactions may justify no longer providing the same level of expertise as currently. However, taking all these elements into consideration, we are unable to conclude that this aspect of Southeastern's proposals represents an improvement on current arrangements in terms of quality of service.

Although Southeastern have said they are not reducing staffing hours at stations, we have found a couple of significant exceptions to this in the data which they provided to us, namely at Penge East from Monday to Saturday and at Charlton on a Saturday.

Where staffing hours are proposed to remain the same, it is also not necessarily the case that the number of staff available during those hours will also remain the same. At some stations, such as Barnehurst and Hayes, the reduction may be small in number but high as a proportion to the current number of staff.

However, it is important to note that Southeastern have proposed that at many other stations there would be at least the same number of staff as currently or an increase in staff numbers compared to today, such as at Belvedere and Brixton.

Looking further ahead, we are also concerned that in future passengers would not have the same opportunity to scrutinise and comment on potential further changes to staffing levels as today. This is because the TSA process would not apply in a situation where there are no longer ticket offices at Southeastern's stations.

The rail industry has argued that this concern can be addressed through the current arrangements under which operators comply with an ORR-approved Accessible Travel Policy (ATP). It is good that the industry has now recognised there is an issue here but the ATP proposal has emerged at an advanced stage of the consultation process and has not been fully explored.

Our view is that the ATP approach offers weaker protection for passengers' interests than the TSA, under which bodies such as London TravelWatch are not merely consulted but are asked to approve or object to proposals. We recognise that satisfactory resolution of this issue is not something that Southeastern can determine alone but until it is in place we object to the proposals to close Southeastern's ticket offices.

Access to products

Our focus in this category is on how far Southeastern's proposed combination of TVM capacity/capability and staff support at the station would, alongside other sales channels, ensure continued widespread and easy access to the purchase of rail products.

We welcome Southeastern's commitment to upgrade their existing TVMs before any ticket office closures would take place. From Autumn 2023, those TVMs will be able to sell tickets from anywhere to anywhere.

It is also positive that Southeastern have committed to providing handheld ticket retailing machines for their staff at all 40 stations in time for the closure of the ticket offices. We were advised at the very end of this consultation that these handheld machines will be able to sell not just most but all the same tickets that are currently sold in a ticket office.

This late development is significant as throughout the consultation Southeastern's mitigation to provide all ticket retailing facilities currently available at a ticket office was to create Travel Centres at seven of their busiest stations in the metro area. Southeastern had said that passengers unable to buy a ticket at their origin station should buy it at the first available opportunity, either on board or at their destination. It is quite right that Southeastern themselves raised this as having a higher expected impact in their strategic Equality Impact Assessment (EqIA) than most other issues.

In our letter to you of 6th September, we expressed our concern that passengers would be inconvenienced by needing to travel further to access a full range of tickets and products. Considering the improved approach to be provided by handheld machines being able to sell all tickets, we are now unclear if Southeastern are still proceeding with the Travel Centre approach. We would welcome clarification on this.

We have a further concern related to the objective of encouraging further migration of sales to online channels. National Rail Enquiries and TOC websites for some time have mis-represented many national rail fares in the London area by displaying them as the "cheapest fare" for a rail journey when there is often a cheaper (but less prominently displayed) rail option via TfL Oyster or Contactless payment.

Consequently, encouraging more people to buy tickets online, as envisaged under the ticket office closure proposals, currently risks directing more passengers to more expensive fares than they need to pay. We are not prepared to accept this. London TravelWatch have raised this concern with RDG, but despite some encouraging signals, there is as yet no agreed "fix" nor a firm timescale for introducing it. A solution needs to be put in place successfully before London TravelWatch can support Southeastern's proposed changes.

Accessibility

We know from responses to the public consultation that there is much concern about the potential impact of the ticket office closure proposals on those passengers who have particular needs when boarding and alighting trains or buying tickets.

Southeastern have committed to maintain, or enhance, the quality of the service provided to customers with accessibility or additional needs using 'Booked Assist' or 'Turn up and Go', with the commitment that all staff will be able to undertake assistance. We note too that Southeastern received the highest overall satisfaction score of any train operator in the July 2023 ORR Passenger Assist survey.

For customers who benefit from the induction loops installed in ticket offices, Southeastern have said that they 'hope that the flexibility of our staff will enable them to seek out a quiet area, with limited background noise, and to facilitate a conversation if needed.' We do not

believe that needing to seek quieter locations is an acceptable mitigation.

Southeastern have said they are planning to create 60 Meeting Points located at convenient places across the 40 stations. If staff are not present at the Meeting Point, passengers will be able to use the Help Point there to contact the control centre, which is staffed 24/7, who will contact a member of the station team directly and direct them to assist the customer at the Help Point. Whilst this is useful information, at this stage there are no further details including timings and any confirmation of funding.

We are aware that train operators have proposed an industry-wide concept of Welcome/Meeting Points as a constructive response to concerns about the potential impact of ticket office closures on accessibility. We think there is merit in the Welcome Points idea, but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the welcome point and needs assistance, whether induction loops would be fitted, clarity over what support will be provided to passengers and whether the welcome points will be fixed. The RDG's letter of 11 October sought to address these points but it is clear that there is still no real certainty for passengers on what would be provided.

We are also very conscious that Welcome Points were not explained as part of the consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with Disabled people and representative groups to secure their endorsement on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and how passenger feedback on them. Our approval of the proposals on ticket offices would need to await the outcome of these pilots.

With regard to buying tickets, all 40 of Southeastern's stations (except Brixton) have TVMs which accept cash, and this will be maintained. Southeastern have advised that cash usage for ticket purchase averages around 1% for these 40 ticket offices, and so they are confident that the current TVMs that accept cash will be able to cope with any increase in usage. Southeastern have also advised that if customers have made every attempt to buy a ticket at their origin station, including if they only have cash as a method of payment and card is the only payment option available, they can buy one on board their train or at their destination. However, passengers must be made aware of this mitigation, if they are not already.

We also note that the revised proposals helpfully mean that passengers who are digitally-disadvantaged or digitally-excluded, or those passengers who say that they find TVMs either very difficult or even impossible to use, will have the option to buy from staff at the stations with access to ticket-issuing machines. This is alongside the Southeastern call centre as another option for those passengers unable or who choose not to use digital channels.

Safety

We welcome the discussions which Southeastern have had with the British Transport Police (BTP) on Southeastern's plans and approach to the proposed ticket office closures including how staff would be supported through additional training courses and with the provision of safety related equipment. We also recognise that, in principle, getting former ticket office staff out and about in stations (if staffing hours are kept

the same) should provide the benefit of a more visible staff presence around the station.

We note the intention to provide risk assessments for each station, taking into account local crime statistics: we assume this refers to the Crime and Vulnerability Risk Assessments produced by the Department of Transport in collaboration with the BTP. Our view is that that should be done and any mitigations identified as necessary implemented before we can approve the proposals.

Future monitoring

We believe it is important to have clarity in advance about the arrangements to monitor the implementation of the proposals. Having a clear set of agreed, publicly reported yardsticks on quality of service allows operators to show how well their proposals are working and helps passengers to hold operators to account.

Southeastern explained that customer feedback is gathered regularly, with their questionnaires monitoring Key Performance Indicators and passenger opinion. However, we did not receive details of the baseline scores for the metrics on service quality and what Southeastern expect in terms of improvement in those scores due to the proposals.

We also note that the Rail Delivery Group (RDG) has said that, to ensure an impartial baseline and that assessment of the proposals is available, operators propose to use the National Rail Passenger Survey previously conducted by Transport Focus. As that survey was paused in 2020 due to Covid, the RDG has been developing the Rail Customer Experience Survey which is due to start in 2024 and which it is suggested will track future metrics.

Our view is, taking all these points together, there is considerable work yet to be done by Southeastern working with other operators, passenger bodies and others to agree which specific core metrics and which recent measurements will be used to provide a meaningful baseline against which the success or otherwise of the proposals could be measured. We would also have expected to see some indication of the expected future movement in the measured scores to support Southeastern's view that the proposals will deliver an improvement in one or other aspect of quality of service. We need the arrangements for future monitoring of implementation to be agreed with us and in place before we can endorse the proposals.

Cost effectiveness

Under the TSA, cost effectiveness is one of the specific criteria we are asked to consider in assessing the proposals. Southeastern have provided some information (for example, on the cost to staff a ticket office for a shift and on their headline assumptions about revenue) and explained that the proposals represent the first phase of a larger business plan, but we have yet to see a comprehensive explanation of the costs and benefits of the proposals.

We understand that some of the financial information may be sensitive, but we are disappointed that the industry has not been able to find a way, at individual TOC level to share some quantitative detail in terms of the overall scale of net financial benefit; the ratio of benefit to costs; the full set of costs and benefits assessed; and the payback period.

The lack of available evidence is all the more remarkable given the emphasis that has been placed by the rail industry and government on improved value for money as a selling point for the proposed closure of ticket offices. Without this information, we cannot with confidence judge

whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness. We therefore have little option under this category but to object to the proposals.

Decision and next steps

Given the above assessment, London TravelWatch objects to the proposals put forward by Southeastern based on the following reasons:

- * in the case of many stations, we are unable to conclude whether the proposed approach to staffing would result in an improvement in quality of service, and in others we are concerned that it could negatively affect quality, either due to a lower level of retailing expertise, or to a lower level of staffing, or to both (see also Appendix 2)

- * agreement has not yet been reached with the rail industry on how passengers' interests might best be represented in future, should proposals be brought forward for further staff reductions after the current ticket offices are closed

- * the continued mis-representation of London rail fares on National Rail Enquiries and TOC websites has not yet been properly resolved

- * Southeastern, working the other operators, needs to secure the endorsement of DPTAC, Disabled people and representative groups on the concept, design and implementation of Welcome Points

- * the proposed Crime and Vulnerability Risk Assessments for each station have not yet been completed, nor any identified mitigations implemented.

- * a set of specific core metrics and baseline measurements has not yet been established against which to measure the impact of the proposals.

- * we cannot with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness.

If Southeastern still wishes to proceed with these proposals, in order for us to withdraw our objection we would require these issues to be fully addressed first. Alternatively, Southeastern may appeal our decision to the Secretary of State for Transport, at which point our involvement in this process will end.

We would again like to extend our thanks to you and your colleagues for engaging with us throughout this process. If you have any questions please do let us know.

Yours sincerely,

[redacted]

London TravelWatch

Appendix 1: Breakdown of public responses for each Southeastern station

- * Station: Albany Park
Objections: 58
Petition:

- * Station: Barnehurst
Objections: 22
Petition:

- * Station: Belvedere

Objections: 11
Petition:

* Station: Bexleyheath
Objections: 72
Petition:

* Station: Bickley
Objections: 21
Petition: 1 petition with 567 signatures

* Station: Blackheath
Objections: 109
Petition:

* Station: Brixton
Objections: 12
Petition:

* Station: Bromley North
Objections: 23
Petition:

* Station: Catford Bridge
Objections: 14
Petition:

* Station: Charlton
Objections: 31
Petition:

* Station: Chelsfield
Objections: 31
Petition:

* Station: Clock House
Objections: 19
Petition:

* Station: Deptford
Objections: 14
Petition:

* Station: Eden Park
Objections: 3
Petition:

* Station: Elmers End
Objections: 9
Petition:

* Station: Erith
Objections: 12
Petition:

* Station: Falconwood
Objections: 21
Petition:

* Station: Hayes Kent
Objections: 45
Petition:

* Station: Hither Green

Objections: 74

Petition:

* Station: Kent House

Objections: 39

Petition:

* Station: Kidbrooke

Objections: 6

Petition:

* Station: Knockholt

Objections: 5

Petition:

* Station: Ladywell

Objections: 42

Petition:

* Station: Lee

Objections: 59

Petition:

* Station: Lower Sydenham

Objections: 5

Petition:

* Station: Maze Hill

Objections: 64

Petition:

* Station: New Beckenham

Objections: 19

Petition:

* Station: New Cross

Objections: 19

Petition:

* Station: Penge East

Objections: 99

Petition:

* Station: Plumstead

Objections: 14

Petition:

* Station: Shortlands

Objections: 68

Petition: 3 petitions with a total of 875 signatures

* Station: Slade Green

Objections: 11

Petition:

* Station: St Johns

Objections: 17

Petition:

* Station: Sundridge Park

Objections: 12

Petition:

* Station: Sydenham Hill

Objections: 12

Petition:

* Station: Welling

Objections: 223

Petition: 1 petition with 437 signatures

* Station: West Dulwich

Objections: 11

Petition:

* Station: West Wickham

Objections: 26

Petition: 1 petition with 27 signatures

* Station: Westcombe Park

Objections: 11

Petition:

* Station: Woolwich Dockyard

Objections: 2

Petition:

Appendix 2: List of Southeastern stations with London TravelWatch decisions

In addition to the reasons listed above, we object to the proposed closure of the ticket offices at the following 32 stations as we are unable to judge whether the proposed level of ticket retailing expertise represents an improvement on current arrangements in terms of quality of service:

- * Albany Park
- * Belvedere
- * Bexleyheath
- * Bickley
- * Brixton
- * Bromley North
- * Chelsfield
- * Clock House
- * Deptford
- * Eden Park
- * Elmers End
- * Erith
- * Falconwood
- * Hither Green
- * Kent House
- * Knockholt
- * Ladywell
- * Lee
- * Lower Sydenham
- * Maze Hill
- * New Beckenham
- * New Cross
- * Plumstead
- * St Johns
- * Slade Green
- * Sundridge Park
- * Sydenham Hill

- * Welling
- * West Dulwich
- * West Wickham
- * Westcombe Park
- * Woolwich Dockyard

We object to the proposed closure of the ticket offices at the following six stations due to concerns about lower levels of staffing levels on weekdays and/or weekends:

- * Barnehurst
- * Blackheath
- * Catford Bridge
- * Hayes
- * Kidbrooke
- * Shortlands

We object to the proposed closure of the ticket offices at the following two stations due to concerns about the level of ticket retailing expertise on weekdays and/or weekends, and staffing levels on weekdays and/or weekends:

- * Charlton
- * Penge East

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.

- * London Living Wage Employer
- * Champions of the Mayor's Good Work Standard