

6th September 2023

[REDACTED]
[REDACTED]

(sent via e-mail)

Dear [REDACTED],

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

Introduction

I am writing to you following WMT's publication on 5th July of plans to close ticket offices at 77 stations on its network, as part of a wider programme of industry reform to change the way tickets are sold at stations.

The proposed changes to six of WMT's London Northwestern Railway (LNR) stations fall within our geographical remit: Apsley, Berkhamsted, Hemel Hempstead, King's Langley, Tring and Watford Junction. We have been analysing the information provided to us as part of the TSA process, including the major change template spreadsheet (Annex B) and supporting documents. We are grateful to you and your colleagues for responding to our queries to date by email and via Teams' meetings.

As you know, we have also been conducting a public consultation on the proposals put forward by WMT and eight other operators in our area. The extended public consultation period closed on 1st September and during that time we received 180,000 responses in total. We are continuing to process the responses, and we will provide a more detailed analysis once we have had the opportunity to complete a review of the content of all the submissions.

We will be preparing our final recommendations on the proposals over the coming weeks. This interim letter sets out our latest understanding of the proposed changes and highlights the outstanding areas of concern where we seek further clarification before reaching our final position. A set of more detailed questions related to the areas of concern is attached as an appendix.

Summary of proposed changes

Since the original 5th July proposals, we understand that WMT's approach has developed, such that the key changes now relating to our six in-scope stations would be as follows:

- closure of the ticket offices at five stations (Apsley, Berkhamsted, Hemel Hempstead, Kings Langley and Tring) within a first phase of a three-year programme of WMT closures
- replacement of staff roles, formerly based inside those ticket offices, with staff in future based on station platforms and concourses providing a range of customer services, as part of a wider rationalisation of the existing WMT team operating in our area

- deployment of staff during newly-specified hours on every day of the week at each of the above five stations. This appears to be a significant change in the original plans, which had proposed that staff would instead form part of a mobile team moving between the five stations in response to customer demand and significant events
- increased reliance on online channels and ticket vending machines (TVMs) at stations to sell tickets previously sold through ticket offices at the five stations, with staff available at these stations to help passengers buy tickets where necessary alongside their other customer service functions
- designating the ticket office at Watford Junction as a customer information centre (CIC), staffed by a multi-skilled team able to carry out a full range of retail transactions for those products which passengers are unable to buy at smaller stations or through other channels. Other stations on the WMT network outside of our geographical remit are planned to host CICs, of which Milton Keynes Central is potentially the most significant to our interests, as it would be the next CIC after Watford Junction for passengers travelling towards Birmingham from our in-scope stations.

Areas of concern

Under the TSA, changes to opening hours may be made if the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness; and members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

The areas of customer service of most interest to us, when considering the WMT proposals for our in-scope stations, relate to passengers' ability to buy the right ticket easily, get good information about their journey, and receive excellent support where they have accessibility needs.

However, we have seen little detail on what scale of improvement the proposals are expected to deliver. We see instead a risk that the WMT plans for staffing and TVMs at our in-scope stations could lead to long queues at TVMs to buy tickets, resulting in missed trains, more stressful boarding experiences and a greater likelihood that passengers will be made unfairly to pay penalty fares. Furthermore, we believe more work is needed to understand and meet fully the accessibility needs of passengers.

We are also unclear how much consideration has been given to the relevance of wider rail developments on the proposals, and what if anything that might mean for the design and timing of any changes.

In the five sections immediately below, we elaborate on the nature of our concerns and (taken together with the questions in the appendix) the specific issues on which we seek clarification.

Expected impacts of the proposals

The information provided on post-implementation monitoring refers to general measures which would be used to establish the impact of the changes once implemented. It is important for us to understand which specific measures are meant, and what is the current quality of service as reflected in those measures, as this effectively provides the baseline against which we are being asked to assess the merits of the proposals.

It is also important to us to understand how far WMT expects the baseline measurements to improve as a result of the proposed changes, both to help us sense-check the proposals and to help passengers hold WMT to account in future, should the proposals be approved for implementation.

The TSA also refers to changes in ticket office hours which may be made where they represent an improvement in cost effectiveness. We have yet to see any quantitative information on the projected costs and benefits for the proposed changes.

Overall level of staffing

Since the publication of your original proposals and our initial inquiries, you have sent us an indicative stations staff deployment plan. The plan includes proposals specifically for the six in-scope stations in the Watford Junction area and our understanding is that they involve:

- a reduction in the numbers of daily Customer Experience FTEs deployed in the Watford Junction area to between c.41% and 79% of current daily ticket office staff FTEs, depending on day of the week
- a reduction in the weekly hours of deployment of Customer Experience staff at five out of our six in-scope stations, to between c.65% (Hemel Hempstead) and 78% (Apsley and Tring) of current Section 17 hours
- a change in the profile of daily hours of deployment compared with current Section 17 hours which, compared with the sales data provided in Annex B, suggests that Customer Experience staff would not be present at five of our six in-scope stations during significant periods of demand for travel. For example: Apsley (78% of sales on Sundays not covered by proposed staffing hours), Berkhamsted (74% of weekday sales on Wednesdays), Hemel Hempstead (92% of sales on Saturdays), Kings Langley (82% of weekday sales on Mondays), and Tring (84% of weekday sales on Tuesdays).

Taking the above elements together with plans for ticket retailing (see below), we find it difficult to understand how the existing quality of service at the in-scope stations will be sustained, let alone improved, in helping passengers buy the right ticket, have the right information and board their train. We would therefore welcome further clarification on proposed future staffing numbers.

We also note that the proposed changes include a reduction in the gateline teams at Watford Junction and Hemel Hempstead from 15 to 8 staff, enabled by a move towards remote gateline operation. We would welcome further information on how remote gateline operation would work, whether it has been adopted elsewhere, and to what effect.

Similarly, it would be helpful to have further details on how the proposed remote operation of station facilities such as toilets and waiting rooms would work, to ensure availability of those facilities outside of station staffing hours, and whether this approach has been tried and tested elsewhere.

Under the original proposals, the concept of a mobile team would have allowed for some staff presence at the Abbey Line stations, which are currently unstaffed. It would be helpful to know what is now intended for these stations under the latest version of the proposed changes.



Finally, we are concerned that potential further cuts in staffing could at some point in the future be made without the same degree of scrutiny and challenge as now. Under the TSA, major proposals to change ticket office hours trigger consultation with the public and passenger watchdogs. Once the ticket offices are shut, there are no similar requirements on operators to consult on potential future changes to the staffing levels being proposed now.

Future ticket retailing capability at in-scope stations

The plans summarised in Annex B and the WMT website assume that sales will shift to other channels – primarily online, but also TVMs (with help where needed from station staff), CICs, contact centres and third-party retailing at a physical location, such as a convenience store. From the information available, it appears that:

- there are no plans to change the number or location of the 18 TVMs at our in-scope stations. Of those, cash payment at TVMs is only available at Watford Junction
- while the website says TVMs “will be upgraded to make sure customers can still buy the most popular tickets” and many staff at stations will have hand-held ticket issuing devices, Annex B paints a different picture. Under the proposed ticket office closures, the alternative arrangements for all rail products, whatever the method of payment, are “facilities at alternative stations”, with TVMs only offering tickets for the day of travel
- in future, some tickets would only be available either online (eg monthly and annual seasons, and railcard sales) or on-train (eg rovers and rangers). Passengers unable to buy their tickets at their station would be able to travel to a CIC and complete their purchase there
- if passengers are genuinely unable to buy a ticket before travelling, they will need to make the senior conductor aware as soon as they can on the train.

Taking the above elements together, we find it difficult to understand exactly what tickets will be available through which channels under the proposals for the five smaller stations in our remit. It is vital that the formal proposals which are being presented and on which we need to reach a decision set out these details more clearly than appears to be the case at present.

As indicated above, we also find it difficult to understand how a smaller customer-service team, deployed for fewer hours, can rely on the same number of TVMs to serve ticket sales while at the same time answering passenger queries and offering general assistance without having a negative impact on queuing to buy tickets.

Understanding the modelling and empirical evidence behind the assumptions about channel shift and adequacy of TVM + handheld capacity is another important area of clarification for us. We note, for example, that the share of total sales through ticket offices at four of the in-scope stations is materially higher than the industry average of 12% - from 18.2% (31,000) at Apsley to 27.1% (43,000) at Kings Langley – suggesting that the impact and likelihood of channel shift may be more of a challenge at these stations than at other locations.

We have a number of further concerns on which we need clarification as we assess the merits of the proposals:

- we are unclear about the timing and specific nature of any upgrades to WMT TVMs, and the extent to which they are part of a wider rail industry initiative

- whether and when the TVMs at five of the in-scope stations will be enabled to handle cash purchases, and what arrangements have been made to mitigate the risk of theft which led to the removal of this functionality in the past
- we would welcome clarification on whether each Customer Experience staff member will have a hand-held device while on duty around the station, whether there is sufficient connectivity at each of the six in-scope stations to allow staff to use devices as they move about the station and whether the devices can handle cash sales
- whether the reference on the website to potential third-party retailing at a physical location, such as a convenience store, is relevant to the WMT stations in the London TravelWatch area, with any supporting detail
- the absence of any details about industry plans to amend the Penalty Fares regime referred to in the Annex B worksheet. Without a properly-considered and consistently-implemented change to revenue protection arrangements, we fear the proposed changes will unfairly expose more passengers who genuinely cannot buy a ticket before travel to the risk of being penalised.

Finally, we are concerned about the possibility that, at some point after the proposed changes (if approved) are implemented, there might be further moves to end the sale of more specialist/lower volume fares products via TVMs or handheld devices. We would welcome written clarification on whether this is a possibility and, if so, what safeguards would be in place to protect customers' interests.

Support for passengers with accessibility needs and ensuring safety

We very much recognise the concerns of passengers with accessibility needs as captured in the user feedback and summarised in the generic WMT EqIA. These include difficulties using online channels and TVMs, concerns about how to find staff for assistance at a station and questions about the usability of help points.

We have also raised with you our concern that two of the EqIAs specific to our in-scope stations (for Apsley and Kings Langley) failed adequately to capture the current accessibility constraints at those locations.

The continued shift of ticket sales to online and digital channels which would be encouraged under the proposals could impact certain types of passengers, including but not confined to Disabled passengers. We know from our own research that passengers with a range of characteristics face barriers in using digital sales channels.

For example, in our report *Left behind Londoners* (March 2023), 1 in 6 of those surveyed said that they had been unable to buy a ticket without a smartphone or internet connection, which had stopped them from travelling. These barriers to travel are exacerbated by the complexity and variety of ticket options for rail travel, particularly beyond London and its immediate hinterland. We would like to understand better how far such insights have been reflected in assumptions about future channel shift and in the range of potential mitigations which might be adopted.

In terms of the mitigations outlined in the documentation to date, we have the following concerns:

- the need to have a fixed point at a station where passengers requiring assistance can speak to a member of staff is critical, for example, for passengers with impaired visibility (guide dogs are trained currently to go to ticket offices) and/or hearing (induction loops are often located at ticket offices). Future arrangements to provide a fixed point at our in-scope stations, and to contact the on-duty member of staff if they are elsewhere on the station, remain to be confirmed
- as noted above, the initial deployment plan suggests that some times of day, when there is a large proportion of the usual demand for travel from five of our in-scope stations, would coincide with periods when the station would be unstaffed. Relying on on-board conductors to support the boarding and alighting of passengers with accessibility needs does not address the question of how those passengers would be helped to get access to the platform in the first place
- we are unclear whether any accessibility user trials/reviews been carried out for TVMs and the proposed upgraded help points, and of the queuing system at TVMs, to ensure they are suitable for disabled customers. Factors such as the height, location, tactile functionality and complexity of on-screen information all affect their accessibility. The outcome of these trials and reviews, and a commitment to implement suitable mitigations, need to be established and validated with relevant passenger user groups before the proposed changes can be approved.

Our concerns should be seen in the context of WMT's relatively weaker performance as reported in the ORR's latest survey of experience with Passenger Assist (July 2023). Those receiving assistance at a WMT station were less likely than the overall sample to say that they were very satisfied with the assistance that they received at the station, and were more likely to state that they were not met or did not receive the Passenger Assist service they had booked.

On safety, the British Transport Police (BTP) has written to inform us that the Department of Transport and others have committed to an extensive programme of Safety, Security and Vulnerability risk assessments of the industry-wide proposals for closing ticket offices. These assessments need to be completed, with mitigations agreed and implemented, before the proposals can be taken forward.

Potentially relevant wider developments

We would like to understand better how much thought has been given to the interaction between the WMT ticket office proposals for our in-scope stations and wider developments, both at London Euston and in the rail industry more generally. We believe that this is relevant to the quality of service experienced by passengers which might be impacted by the proposed changes, and to the timing of their implementation, if the proposals are approved.

At London Euston, for example, WMT currently deploys staff at the gateline and on the concourse, as well as a number of TVMs (including those in the ticket hall managed by Avanti, next to their TVMs). We have learnt that consideration is being given to installing a new gateline at the station affecting all operators, including WMT; and it is conceivable that there might be proposals to consider potential alternative uses for the ticket hall, should Avanti's proposals to close their ticket office counters go ahead.

We believe that at least in principle, these developments could create both challenges and opportunities relating the quality of service experienced by all passengers (including those travelling on WMT services) at the station. For example, these might impact on the future location of TVMs, ease of wayfinding through the station, and boarding arrangements. These factors have a bearing on the functions of the WMT team based at London Euston, the destination and origin for many of the journeys involving our in-scope stations, so we feel it is important to have confirmation of any changes which WMT might be considering to staffing and TVM arrangements at London Euston.

We would also like to understand better how far the proposed ticket office changes have been considered in the context of industry-wide discussions about fares reform. This initiative, if done well, has the potential to improve passenger confidence that they can get the best value ticket for their journey. Logic would suggest that, for passengers, it would make sense for such reform to be successfully implemented before introducing changes which reduce the availability of staff at the in-scope stations, and on whom many passengers currently rely for help in buying their ticket.

The same principle applies in the case of the planned roll-out of contactless payment (CPAY) to stations in the London TravelWatch area. Our five smaller in-scope stations come under the first phase of Project Oval implementation. While this initiative should bring benefits to passengers in terms of simplification, we understand that it will also involve fares changes which will create winners and losers. We anticipate that the changes will generate additional queries from passengers as the new arrangements bed in, and so again it would seem sensible for the proposed changes to ticket offices to take place after things have subsequently settled.

Next steps

We would welcome responses to these points and our questions by **Wednesday 27th 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 signature]

[Redacted name]

London TravelWatch



Appendix – Specific clarification questions

Expected impacts of the proposals

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

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

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

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

Overall level of staffing

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

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

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

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

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

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

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

Future ticket retailing capability

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

Please provide evidence to show that the proposed combination of staff, TVMs and handheld devices will be sufficient to handle future ticket sales at the station, especially at peak hours. This should include information on

- overall and remaining TVM capacity (factoring in existing sales and Ticket on Departure collections per hour);
- contractual Service Level Agreements (SLAs) for TVM availability and for fixing out of order TVMs, and recent delivery against those SLAs
- the forecast level of cash sales of tickets at the station and the level of planned TVM capacity to service those sales
- any plans you have to upgrade TVM functionality and if so, what would this cover and when would it be complete?
- the proposed numbers and functionality of handheld devices (for example, can they service cash sales) available to on-duty staff, and ease of access to them.

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

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

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

Support for passengers with accessibility needs and ensuring safety

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

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

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

Have any accessibility user trials/reviews been carried out for TVMs and the proposed upgraded help points, and of the queuing system at TVMs, to ensure they are suitable for disabled customers? What follow up action if any is planned as a result?

Do all of our in-scope stations have tactile paving fitted?

Please provide details of any concerns which the BTP may have raised with you about potential safety and security risks to passengers and staff arising from WMT's proposals.

Potentially wider relevant developments

What consideration has been given to the implications of potential ticket office and other related developments at London Euston, and WMT staffing? Please confirm plans for future deployment of Customer Experience staff and TVMs at London Euston.