

* London TravelWatch

31 October 2023

[redacted]

West Midlands Trains (WMT)
(sent via e-mail)

Dear [redacted]

West Midlands Trains (WMT) Proposals to close ticket offices under the Major Change Process of the Ticketing and Settlement Agreement (TSA)

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 at 6 of WMT's London Northwestern Railway (LNR) stations fall within our geographical remit: Apsley, Berkhamsted, Hemel Hempstead, Kings Langley, Tring and Watford. We have been analysing the information provided to us as part of the TSA process, including the Major Change template spreadsheet, your response of 27th September to our interim letter (available in the annexes), your letter and attachment of 13th October, 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 WMT 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. 8,920 of these responses were specific to WMT. We have now processed these responses and included a summary of the resulting analysis in this letter.

Summary of the proposed changes

Since the original 5th July proposals, and our concerns as expressed in our 6th September letter, you have written to us on 13th October setting out WMT's revised proposals.

You explained that the key change was an increase in the resources associated with the proposals to ensure that there are more hours of staff coverage at affected stations than originally put forward. We understand that the key elements of WMT's proposals as they relate to our 6 in-scope stations are now as follows:

* closure of the ticket offices at 5 stations (Apsley, Berkhamsted, Hemel Hempstead, Kings Langley and Tring)

* designating the Watford Junction ticket office as a customer information centre (CIC), staffed by a team able to carry out a full range of retail transactions. Other WMT stations outside of our area are planned to host CICs, of which Milton Keynes Central (as the closest) is potentially the most significant to our interests.

* maintaining the current ticket office staffing hours and associated staffing numbers at all 6 of the stations in our area, with roles formerly based inside ticket offices at 5 of the stations redeployed to platforms and concourses.

* increased reliance on online channels and ticket vending machines (TVMs) at stations to sell tickets previously sold through ticket offices at the 5 stations, with staff available at these stations to help passengers buy tickets where necessary alongside their other customer service functions.

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 TOCs, 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>

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

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

WMT received 8,920 specific to their stations. Of these 8,889 were objecting to the proposals. Objections were received for all 6 of the stations WMT put forward proposals for. A station-by-station breakdown 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 station 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 is 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?

Our assessment of the proposals

London TravelWatch understands how WMT's proposals in principle might benefit passengers. Redeploying staff potentially allows them to provide a more personal service, to a larger number of people at the station than the declining proportion of passengers who visit a ticket office, whilst at the same time making more effective use of their time and skills. This in turn could allow the railways to run more efficiently and so improve their financial sustainability.

The key question for us is whether the evidence that has been provided is robust enough to show that the benefits to passengers mark an improvement on the current system and will be evident from day one of the proposals being 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 6 factors.

Quality of service

Our focus under this category is primarily on the potential impact of staffing hours and staffing levels.

In our interim letter of 6th September, we set out our concerns about the proposals being presented at that time. We struggled to understand how a smaller customer-service team, deployed for less time and on the basis of a different daily profile of hours, could deliver the existing quality of service, let alone an improved one.

We therefore welcome the decision to reconsider your approach and confirmation in your 13th October letter that WMT will retain current ticket office staffing hours and levels at the stations in our area.

With the former ticket office roles redeployed to platforms and concourses, as intended under the proposals, we can see the potential to deliver better service by staff being physically more accessible to passengers wishing to buy tickets or needing information and assistance more generally. However, to give us further confidence that the proposals would improve passengers' experience at the station, we would welcome further details on the following points:

- * how far the redeployment of staff would also involve an increase in their duties. WMT's Annex B workbook refers to current ticket office staff duties simply as "sell tickets/information/assistance" but provides no information on future duties under the proposals. We would be concerned if any plans to assign further functions compromised your staff's ability to deliver their current core responsibilities.

- * how robust are the planned staffing levels in the light of current absence management, vacancies and recruitment. We note a varied picture of compliance with S17 ticket office hours in the WMT lost hours report for the 6 weeks covered by the data: the largest losses of hours in any

individual week were 17.5% (twice, at Tring), 24% (Hemel Hempstead), 39% (Kings Langley), 44% (Berkhamsted) and 59% (Apsley).

The WMT team deployed on the concourse and platforms at London Euston does not strictly form part of your proposals for closing ticket offices in our area. However, in our interim letter we highlighted our interest in any plans for this resource, to establish a full picture of future service quality for WMT passengers in our area.

The attachment to your 13th October letter suggests that staffing hours at Euston would remain unchanged. Informally, we believe that you are considering the scope for this resource to be deployed flexibly along your route, which among other things might allow for some staff presence at the currently-unstaffed six Abbey Line stations in our area. Subject to understanding the impacts of this approach on operations at Euston, this could bring benefit and we would welcome further details of your plans.

Subject to the above clarifications, we are therefore minded to support the revised WMT proposals for stations in our area, as described in your letter of 13th October. However, as explained in our interim letter, we are 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 is no longer a ticket office at a WMT station.

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 WMT can determine alone, but it is essential if we are to approve the proposals to close the ticket offices at WMT stations.

We note that under the latest version of the proposals, facilities will continue to be made available by staff during the current staffing hours, so there is no longer a change in this aspect of quality of service to consider.

Access to products

In your 27th September letter, you provided an attachment with data on ticket sales by sales channel over the last 5 years for travel from the 6 WMT stations in our area. The figures (2018/19 to 2022/23) show that:

* online sales grew in nominal terms in 5 of the stations (Watford Junction being the exception) and as a share of total sales in all 6 stations.

* ticket office sales fell nominally and as a share of total sales in all 6 stations. Nevertheless, at 4 of the stations, the share of total sales through ticket offices in 2022/23 was materially higher than the industry average of 12%: Apsley (20.4%), Berkhamsted (20.5%), Hemel Hempstead (23.2%), Kings Langley (28.9%)

* combined ticket office and TVM sales at 5 of the stations in 2022/23 still accounted for a large share of total sales - between c 48% (Tring) and c 65% (Hemel Hempstead). The figure for Watford Junction is significantly lower (c 28%) due to the availability of Oyster Pay As You Go (PAYG) and contactless payments (CPAY) at the station for TfL's London Overground services.

The decision by WMT to reconsider its original ticket office closure proposals and to reinstate the existing staffing hours and levels at the stations in our area is therefore welcome. The additional commitment that these staff will retain access to existing ticket office methods of retailing means that staff should be available for the same amount of time as now, to sell tickets directly or by helping passengers using TVMs, and through both of those channels to offer the same full suite of tickets as today.

Our support for this approach is conditional on clarifying our earlier questions about future duties and absence management. We would also welcome clarity on how the proposals anticipate staff located in open areas of the station managing with simultaneous approaches from more than one passenger at busier times, rather than dealing with passengers one by one as they approach the ticket office window. We are concerned that the change in arrangements risks making it more difficult for staff to serve passenger needs, thus adding to queueing times and passenger frustration.

We also note from your letter of 27th September that you have no plans to increase TVM capacity at the stations in our area. This is based on the declining trend in TVM usage (though TVM sales at Tring in 2022/23 were higher nominally and as a share of total sales than in 2018/19), and the scope for further migration away from TVMs and purchases from staff with the planned introduction of CPAY for national rail journeys at the WMT stations in our area.

We also understand the point in your covering email of 13th October re improving the functionality of TVMs at your stations in our area is a less immediate issue, given the staffing provision envisaged under your latest proposals. This feels like a missed opportunity to improve TVMs as an alternative sales channel for passengers and thus to reduce the number of multiple requests which we believe staff are likely to face as they are redeployed out of ticket offices.

We have a further concern related to the objective of encouraging further migration of sales to online channels. National Rail Enquiries and train operators (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. 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 WMT's proposed changes.

Finally, we note the comment in your covering email of 13th October to the effect that issues regarding unpaid fares policy are now less relevant to the revised WMT approach. We understand the rationale behind this, on the basis that the staffing hours and levels you are now proposing in themselves are unlikely to risk creating additional ticketless travel.

However, we understand from information which you have previously provided and which other operators have given that the industry is considering ideas such as clarification of travel in Compulsory Ticket Areas (CTAs), as well as interim policy guidance/training about the National Rail Conditions of Travel (NRCoT) regarding Penalty Fares. We need to be given the opportunity to consider these proposals to ensure they are properly thought-through before they are implemented.

Accessibility

As we set out in our interim letter to WMT, we very much recognise the concerns of passengers with accessibility needs, including the concern about how they will be able to find redeployed staff at stations, should the proposals to close ticket offices go ahead.

In your 27th September letter, you indicated that WMT would aim to replicate the focal point of the station where passengers could find a staff member for assistance, most likely where the ticket office used to be. The industry also more generally has sought to respond to these concerns with the development of the Welcome Points concept.

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 11th 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.

In our interim letter to you, we flagged WMT's relatively weaker performance as reported in the ORR's latest survey of experience with Passenger Assist (July 2023). We also asked in our letter whether any accessibility user trials/reviews had been carried out for TVMs and the proposed upgraded help points under your original proposals, but this was not picked up in your response. We would welcome some explanation of how you intend to address both sets of issues (Passenger Assist provision and accessibility trials) under your new proposals.

Finally, we recognise that the new approach to staffing provision as part of your proposals to close ticket offices at stations in our area preserves an important non-digital sales channel for your passengers. However, we note from your letter of 13th September that WMT currently does not have any existing programmes aimed at mitigating digital exclusion and we feel this should still be addressed. We would also welcome confirmation that the lack of TVMs which accept cash at Berkhamsted, Hemel and Kings Langley will be addressed at the earliest opportunity.

Safety

Your latest proposals would retain the current ticket office staffing hours and levels at the stations in our area, but redeploy the roles formerly based inside ticket offices at 5 of the stations to platforms and concourses instead. In principle, that should increase the visible staff presence at those stations and at those times, with a welcome improvement among passengers in their perceived safety and security.

In your 27th September response to our interim letter, you did not indicate whether the BTP had raised any concerns with you about the safety and security aspects of the proposals as they then stood. We note and welcome each train company's intention to complete a Crime and Vulnerability Risk Assessment (CVRA, produced by the Department of Transport in collaboration with the BTP) of their proposals.

As WMT's proposals relating to the 6 stations in our area envisage retaining the current ticket office staffing hours and levels, we would not expect your CVRA to identify any major new concerns about safety and security. However, our view (as with other operators) is that the CVRA should be completed, 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.

In your letter of 27th September, you referred generally to the expectation that the current customer service measures would continue. In the covering email to your letter of 13th October, you expressed the belief that there would not be any detriment to the level of service at stations in our area, but that how that would be measured was "down to as of yet to be confirmed metrics, in line with the wider industry approach to this."

We note that the Rail Delivery Group (RDG) has said that, to ensure an impartial baseline and assessment of the proposals is available, operators propose to use the National Rail Passenger Survey previously conducted by TF. As that survey was paused in 2020 due to Covid, 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 WMT working with other operators, passenger bodies and others to agree which specific core metrics will be used and which recent measurements will be used to provide a meaningful baseline against 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 WMT'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. In response to our request for details to demonstrate the cost effectiveness of your proposals, WMT has explained (in your 27th September letter) that it has developed a business case in line with the industry which outlines the overall costs and benefits, but has been unable to provide us with further detail.

We understand that some of the 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

We welcome the decision by WMT to reconsider its original proposals in the light of concerns we had raised. We also welcome the confirmation in your 13th October letter that, in proposing to close ticket offices at 5 of the stations in our area, WMT's intention now is to retain current ticket office staffing hours and levels at the stations in our area.

With the former ticket office roles redeployed to platforms and concourses, as intended under the proposals, we can see the potential to deliver better service by staff being physically more accessible to passengers wishing to buy tickets or needing information and assistance more generally.

However, having assessed your approach, London TravelWatch objects to the proposals put forward by WMT based on the following reasons:

- * we seek clarification as to how the future duties of redeployed staff, and the management of staff absence/recruitment, will affect the robustness of your plans to improve the quality of service to passengers

- * 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

- * WMT, 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 intended Crime and Vulnerability Risk Assessment of the proposals has 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 WMT 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, WMT may appeal our decision to the Secretary of State for Transport, at which point our involvement in this process will end.

We would 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

A list of objections and petitions by station

* Station: Apsley
Number of Objections: 78

* Station: Berkhamsted
Number of Objections: 1

* Station: Hemel Hempstead
Number of Objections: 213

* Station: Kings Langley
Number of Objections: 98

* Station: Tring
Number of Objections: 155

* Station: Watford Junction
Number of Objections: 112

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

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