6 September 2023

████████
██████████████

(Sent via e-mail)

Dear ████

Proposals to close ticket offices

I am writing on behalf of London TravelWatch in response to c2c's proposed changes to ticket offices at 10 stations on your network in our geographical network. This includes closures of ticket offices at 8 stations, and changes to retained ticket offices at 2 stations.

As you'll be aware the public consultation period has now ended, during which we received approximately 180,000 responses in total. We are continuing to process these, and we will provide a more detailed analysis of consultation responses once we have had the opportunity to carefully review the content of all the submissions.

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 several concerns regarding c2c's proposals, and their ability to meet these criteria. We have outlined these below and attached an appendix with a list of questions requesting more clarification on these points.

Easy and widespread availability of tickets

As part of any proposals customers need to be able to buy the ticket they need for their journey, in an easy and timely way. However, there are questions from the public and ourselves regarding if this will still be feasible for all passengers if your proposals are to be implemented. Some of the biggest concerns raised include:

Adequacy of retail facilities

- Where tickets are available through digital channels, not everyone is able to use these methods to buy their tickets, for example if they don't have internet access or the tools are not accessible. 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. Even where a person does has access to these channels, many people have told us the complexity and variety of ticket options available means they do not feel able or confident enough to book their travel tickets without assistance from staff.

- Where passengers can buy their tickets from a Ticket Vending Machine (TVM), we have questions about their ability to meet the retail capacity needed if ticket offices close. c2c note that ticket offices account for 35.8% of transactions, a significant number amount. Will other channels be able to cope with the transferred demand, particularly at stations where ticket office sales are relatively high (such as Barking and Upminster)? This presents the risk of customers facing significant queues to purchase tickets, increasing instances of missed trains or boarding without a ticket.

- We note that all of c2c's stations are due to have contactless pay-as-you-go extended to them before proposals are implemented, should they go ahead. While this should benefit many passengers and alleviate pressure on other retail channels, the true impact remains to be seen (and not all passengers will be able to use contactless, for example those without bank accounts).
  We understand that it will also involve fares changes which, while simplifying the structure, will create winners and losers. We anticipate that the changes will generate additional queries from passengers as the new arrangements bed in, so it would seem sensible for any proposed changes to ticket offices to take place after things have subsequently settled.

Usability, functionality and accessibility of TVMs

- We understand that not all tickets and products are available from TVMs, for example annual season tickets or railcards. If your ticket offices were to close this would represent a significant decrease in retail capability at stations, which in the absence of a ticket office will stop some people buying the ticket they need.

- TVMs are not accessible to all passengers. For example, they may not be at the right height for wheelchair users, and we have had concerns from the visually impaired and blind community that touch screens are inaccessible.

- Many responses from the public noted that they find TVMs generally difficult to use, for example they can be slow and confusing to navigate. If poorly located this can also make them harder to use, for example if glare from sunlight makes the screens difficult to read.

- 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.

- We note that a cash TVM is present at every station. It is important this is accessible and will be able to cope with potential increased cash flow. If this fails and there is no cash retail option many passengers who pay for their tickets this way will not be able to buy a ticket before they board their train. This risks worsening customer experience for these passengers and potentially losing industry revenue.

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.

Champions of the Mayor's Good Work Standard

Retail staff support

- A significant number of public responses noted they find the fares system complex and confusing, and they are often unsure of what ticket to buy. In contrast to many other self-service retail situations, many passengers will need support not just to use the TVM but also to understand the most appropriate ticket to purchase when faced with multiple ticketing options for the same journeys. They can rely on staff advice to make sure they are purchasing the correct fare, raising questions of how they will receive this support in stations where proposals would reduce staffing.

- While we understand under your proposals floorwalkers (at stations who have them) will be able to help people buy the right tickets at TVMs (where possible), there are questions about whether they will have sufficient expertise to navigate the complex fares system.

- Given the issues with the usability and accessibility of TVMs, if staff assistance to purchase a ticket from a TVM is not available it will be harder for passengers, particularly Disabled passengers, to purchase a ticket before they board.

Providing assistance to travel in a timely and reliable manner

Station staff are a vital way in which many passengers receive assistance when travelling. This is not just with regards to buying tickets, but also providing further assistance, information and advice, support during disruption, and improving safety and security. However, we are concerned that under your proposals staff availability will be reduced, with a corresponding fall in passenger support and customer experience.

While we recognise under your proposals there will be a mixture of staffing changes at stations, generally staff numbers would fall across the board:

- Stations of all sizes, including both retained ticket offices, will see a reduction in staff. For example at London Fenchurch Street the number of FTEs will fall from just under 45 to just under 36, a significant decrease.

- While Limehouse, Rainham and Ockendon will continue to be staffed, we are concerned that there will be no floorwalkers at these stations. We understand that it is only floorwalkers who will have the same knowledge as current ticket office staff, so while other staff may be able to provide other support, they will not have the more detailed retail expertise that customers may require.

- Of most concern are the proposals at Dagenham Dock and Purfleet, which would be destaffed and only served by mobile staffing teams. There are questions about whether these will be able to robustly and reliably provide timely help to passengers who require support, advice and assistance.

While we believe a reduction in staff presence risks worsening the customer journey in general, we are particularly concerned about the impact this would have on Disabled passengers, for example on their ability to 'turn up and go'. This is most problematic at destaffed stations. While mobile staff may be able to offer this service in the place of static staff, there are concerns about whether this will be able to delivered in a timely and robust

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.

**Champions of the Mayor's
Good Work Standard**

way. Additionally, it will inevitably worsen some passengers' experience, with those requiring this service to either pre-book or wait for staff to arrive.

Even when a station retains staff, there are questions about whether there will be enough capacity to meet all passengers' needs at stations with reduced staff numbers, particularly as they will be in multi-skilled roles, not just retail. There is a risk they may be stretched too thinly to meet passengers' needs.

Many respondents to the consultation have also questioned how they will be able to find redeployed staff at stations – while in theory they may be more visible outside of the ticket office, in reality they may be harder to find. At present, passengers have a clear focal point when looking for help from staff in the form of the ticket office. We are particularly concerned about the impact proposed changes to this would have on accessibility and the ability of Disabled people to travel by train, as ticket offices are often set up to provide more accessible support. For example some guide dogs are trained to go to the ticket window, and they can have induction loops to help people hear. The single focal point also means people aren't required to move around the station trying to find assistance, which may be particularly difficult for people with mobility impairments. Passengers need to have an easy to find place to go to find staff or notify staff that they need assistance.

There should also be a simple way for people to know the order in which they will get assistance in the absence of a queuing system to provide clarity and assurance they will be helped, and avoid potential conflict.

We understand that 'help points' at stations may be used to mitigate these issues, and indeed passengers are likely to be more reliant on these to obtain assistance and information if a ticket office at a station closes. However, research by the Office of Rail and Road[1] identified a number of issues with their use. The report suggested that it may be difficult for disabled passengers to have confidence in boarding a train if they request assistance from a Help Point at an unstaffed or partially staffed accessible station.

Preventing unfair penalty fares

As outlined previously, proposals to close ticket offices that rely on TVMs that are not fully accessible, do not sell the full product range, and can be difficult to use would mean an increase in passengers who are unable to buy the ticket they need before they board the train. Given this, it is important that passengers are made aware that they can board their train without a ticket if they cannot buy the ticket they need from the station.

Additionally, signage at stations must not send contradictory messages. For example, 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 final destination.

There are also concerns that in these instances passengers will be relying on the good will of ticket inspectors to not issue them a penalty fare, and questions regarding what passengers would need to provide to prove that they could not buy the right ticket before travelling. People need to be confident that they will not be penalised unfairly.

---

[1] Accessible Travel Policy Implementation Review of unbooked assistance and Help Points - Office of Rail and Road, 2022

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.

Champions of the Mayor's
Good Work Standard

Availability of station facilities

From the information provided it appears that access to vital station facilities including lifts, waiting rooms and toilets should be maintained at c2c's stations. However, some of these will be monitored remotely and/or opened and closed by mobile staffing. Again, there are questions about whether they will be able to robustly ensure the availability of these facilities. If not, this could worsen the customer experience, particularly for Disabled people and those in more vulnerable situations, for example a solo traveller at night without access to a waiting room.

Safety and security

Where your proposals have reduced or removed staff presence at stations this risks making passengers feel less safe. Passenger feedback so far has highlighted worries around anti-social behaviour and crime, particularly at certain stations, and concerns that these will get worse if there are fewer staff present. This is a particular concern in the evenings.

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.

There are also some concerns about the security of passengers when buying tickets. If a person is situated in a ticket office it is clear they are an official member of staff. However, if they are roving around the station they may be more difficult to identify. While some visual markers will help, for those who are blind or have visual impairments there are questions as to how they will be able to verify the individual helping them is indeed a member of staff. This is a particular worry if the person is helping them with payment involving cash or card details, or requires the use of the customer's personal phone (for example to help them download a ticketing app).

Other issues:

A number of additional issues have also emerged during the consultation process:

Future changes

The public consultation feedback so far has highlighted a widespread concern that if ticket offices are closed then potential further cuts in staffing could be made in the future 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.

As outlined previously, staffing is a crucial part of supporting people to use the rail network. An alternative regulatory mechanism covering station staffing could provide significant reassurance to passengers and stakeholders on this point.

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.

Champions of the Mayor's Good Work Standard

Timing of mitigations

There have been many comments about the sequencing of events and a call for fares and ticketing to be reformed and simplified *before* removing ticket offices. The same applies to the timing of potential mitigations designed to lessen the impact of closing ticket offices, such as upgrading TVMs. If mitigations to address the concerns raised are not in place from the first day a ticket office is closed, it may present a serious deterioration in service for passengers until they are introduced.

Cost benefits

Both public and stakeholder responses have questioned whether proposals to close ticket offices will in reality be cost-beneficial, but instead risk costing the railways money. While running costs may be lower, if people are deterred from using the rail network the potential fall in revenues may outweigh these savings.

Evaluation

Should the proposals be approved, it will be important to monitor the changes to understand their impact. We would also expect this to inform changes and extra mitigations that may be needed to improve customer experience where it is underperforming.

Next steps

We would welcome responses to these points and our questions by 27 September 2023. 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** 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.

Champions of the Mayor's Good Work Standard

Appendix - Clarification questions

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 has been carried out? This is both in terms of overall capacity and 'remaining' capacity – i.e. factoring in existing sales and Ticket on Departure collection per hour from the TVM?
- Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?
- What mitigations do you intend to put in place to help staff 'queue bust' at busy times?
- How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?
- What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?

Usability, functionality and accessibility of Ticket Vending Machines (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 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?
- 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

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.

Champions of the Mayor's Good Work Standard

at the station and useability in different weather conditions?

- 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.
- What should passengers do if they cannot find the ticket they need on a TVM and no staff are available to help?

Retail staff support

- 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)?
- 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?
- 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 rationale was used when determining whether a station should have a floorwalker present?

Paying by cash

- 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?
- If not all TVMs accept cash, are those that do in an accessible location. For example can they be reached from all platforms, and if TVMs are in multiple locations across the station is it clear where cash ones are?
- If a person cannot pay by cash at the station what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?

Providing assistance to travel in a timely and reliable manner

- When static station staff are a) reduced in number and b) removed 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 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?

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.

Champions of the Mayor's Good Work Standard

- - 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?
- What rationale was used for determining which stations would be destaffed?
- What evidence do you have that mobile staffing teams will be able to robustly deliver assistance and support in a timely and reliable manner?
- 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?
- 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 assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?
- 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 ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?
- What devices will staff have? How will staff be able to give people journey itineraries and other printed info?
- 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 and 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?

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 evidence does the passenger need in order to ensure any revenue protection action against them can be withdrawn, if they were travelling without the correct ticket because they couldn't purchase it before they boarded the train?

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.

Champions of the Mayor's Good Work Standard

Availability of facilities

- Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn?
- And if so when will any proposed mitigations be implemented?
- And if facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?

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?

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?

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.

Champions of the Mayor's Good Work Standard

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?

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.

Champions of the Mayor's
Good Work Standard