

# London TravelWatch Ticket Office Closure Consultation Report December 2023

In July 2023 the rail industry publicly announced plans to close most ticket offices at stations across England. This started a consultation process outlined in the Ticketing and Settlement Agreement, culminating in London TravelWatch objecting to all train companies' proposals to close ticket offices in our geographical remit.

This report sets out:

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## 1. The procedure for major changes to ticket offices

If a train company wishes to make a major change to ticket office opening hours it must follow the procedure set out in clause 6-18 of the [Ticketing and Settlement Agreement](#) (TSA). This states that changes to the 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 has a formal role in assessing any such proposals and may object to a proposal on the grounds that it does not meet one or both of these criteria. To assess this, we reviewed the following factors, which we have derived from section 5 of the [Secretary of State for Transport's Ticketing and Settlement Agreement 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?

Clause 6-18 of the TSA also requires a train company to post details of the proposed change at affected stations and to invite people to send representations to London TravelWatch (or to Transport Focus if the station is based outside of London TravelWatch's operating area). London TravelWatch analyses these responses and the details of the proposals themselves to help inform its decision on whether to object to the proposals for stations in its operating area.

## 2. The consultation process

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the TSA. 13 train companies announced their plans simultaneously, of which 9 were consulting on ticket offices at stations in London TravelWatch's geographical remit.

London TravelWatch was made aware in advance that large scale changes to ticket offices were going to be proposed. This was needed to allow us to put the necessary procedures and resources in place to facilitate the consultations. However, while during this pre-consultation period of engagement we were able to raise general concerns about potential changes to ticket offices, the full details of the proposals were not provided to us until the formal start of the consultation. Additionally, proactive engagement from the industry was largely limited to the Rail Delivery Group and the Department for Transport, with limited direct engagement with train companies before the process started.

Under the terms of the TSA, when launching a consultation train operators must display details of the proposed change at affected stations, inviting passengers to make representations to Transport Focus and London TravelWatch within 21 days. In the days that followed the launch of the consultation, we visited most London termini and some other stations in outer London to check if this had been done. We found that details of the proposals were provided in the form of posters of varying

sizes – from as small as A4 to large posters on stands. These posters were usually – but not always – placed in obvious locations. However, the size of some stations meant that several posters were required, but this wasn't always found to be the case.

Beyond providing posters, train companies are not obliged to use any further channels to communicate their plans to the public. However, we are aware that at least some train companies used tannoy announcements and information screens in stations to let passengers know about the consultations. Each train company also provided information about their proposals on their websites. This included instances of accessible versions of the consultation information, such as British Sign Language videos or Easy Read versions, though these alternative formats were not all necessarily in place on websites from the start of the consultation period. Other online channels such as social media and emails to passengers were also used.

To help inform the passenger bodies' analysis, each train company provided London TravelWatch and Transport Focus with an Equality Impact Assessment (EqIA). However, we were surprised to face so much reluctance from some train companies to publish their EqIAs more widely, whether their overarching document, station by station analysis document, or both. We strongly believed that the information in the EqIAs was in the public interest and should therefore be in the public domain, in order to allow people to submit informed responses to the consultation. We communicated this view to the train companies and noted that, if they did not make their EqIAs available, we would provide it to passengers. Finally, well into the second week of the consultation period in most cases, the train companies published at least their overarching EqIAs on their websites. In any future ticket office consultations, train companies will need to do better.

The consultation process was challenged, especially over whether people (and particularly disabled people) had adequate information on which to comment. As mentioned above, the train companies subsequently made proposals available in alternative formats and published the EqIAs. The consultation period was also extended by the train companies to 1 September, giving people longer to respond.

More broadly, the consultation combined wider issues of workforce reform alongside specific changes to ticket office opening hours. It has therefore been argued that the two should have been split – with a separate consultation on the principle of closing ticket offices/retailing at stations, followed by a specific consultation on changes to opening hours for each station.

However, under the terms of the process set out in the TSA, a nil response on the part of London TravelWatch would have been considered as acceptance of the proposals. Therefore, we continued with our role in the process as written.

London TravelWatch was originally due to respond on 30 August but when the consultation period was extended this moved to 6 October, with the agreement of the passenger bodies. Due to the unprecedented volume of responses to the consultation, this date was subsequently extended again, until 31 October, to allow enough time to process and analyse responses.

During the consultation process we engaged with train companies and the Rail Delivery Group to raise the concerns that were arising. We formally set out our concerns with the proposals and requested more information and clarification from train companies in our “interim letters” to them on 6 September, which train companies responded to in late September<sup>1</sup>. These responses subsequently helped inform our final decisions, which were published on 31 October.

We liaised with Transport Focus throughout the process given the interlinked nature of the proposed ticket office closures, though ultimately our views were our own. We thank them for their engagement throughout the process.

### **3. Public responses to the changes**

During the consultation period London TravelWatch received a total of 232,795 representations via email, freepost and phone.<sup>2 3</sup> These were a combination of responses to individual stations, specific train operating companies, and to the proposals across all companies and stations. Of these, 231,471 (99%) were objections. 57,179 responses (24%) objected to all changes across the rail network.

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 responses 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:

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<sup>1</sup> *Ticket office consultation: summary of responses*, Transport Focus 2023 -

<https://www.transportfocus.org.uk/publication/ticket-office-consultation-summary-of-responses>

<sup>2</sup> Please note some of these responses will overlap with those received by Transport Focus, as some representations were jointly sent to both organisations.

<sup>3</sup> Transport Focus conducted a demographic survey of those who responded to them as part of the consultation process. A summary of these results can be found in the Transport Focus consultation report.

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

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

We also 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. We also engaged directly with some stakeholders when approached, including trade unions, charities and government organisations. While these were an opportunity to answer questions on how the process works, they were largely listening sessions to gather their feedback on proposals in order to retain our objectivity.

Objections were received for all of the stations train companies put forward proposals for.

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 train company consultations.

## **4. Our assessment of the proposals**

### **Quality of service**

A clear theme which came through from respondents to the consultation was how highly they valued the quality of service provided by ticket office staff.

*“There are many members of the public who need the excellent help and guidance given by the staff in ticket offices.”* South Western Railway passenger

*“Staff can advise about directions, problems and fares - saving people both anxiety and money. Without a real human being, passengers like myself will be left to struggle, worry and just muddle through.”* GWR passenger

*“We really need your staff on hand at the station each and every day to help us with enquiries, give advice, sell tickets, explain what to do in the event of cancellations - a*

*frequent occurrence on our line - and to assist the many passengers who need physical and other assistance.” London Northwestern Railway passenger*

The anticipated impact on quality of service from the proposals therefore caused much concern from passengers in their consultation responses. One of the biggest issues were worries about the provision of information needed to plan journeys, including during periods of disruption and the support available to help passengers who need assistance.

*“When there is disruption, delay and cancellation, ticket office staff reassure and give immediate options.” South Western Railway passenger*

*“Ware ticket office is open whenever I visit and the personnel are fantastic: helpful and obliging. I don’t know how I would manage without them.” Greater Anglia passenger*

*“I was dismayed at the proposals to close tickets offices in Chiltern stations. I have relied on these knowledgeable, friendly and helpful people on numerous occasions and know their removal will cause untold difficulties.” Chiltern Railways passenger*

Retaining staff was seen as critical to retaining key station facilities such as toilets (including accessible toilets), waiting rooms and lifts. There was concern that they would remain closed if there was no member of staff present to open them.

*“At many stations access to facilities such as toilets, disabled toilets, waiting rooms and lifts is dependent on ticket office staff.” Govia Thameslink Railway passenger*

Most of the original ticket closure proposals, which people responded to in this consultation, would have led to a reduction in the number of staff and/or the levels of ticket retailing expertise of the staff that remained. Many train operators also proposed reductions in the number of hours that staff would be available. In some cases, it was proposed to reduce the number of days which would see staff at stations or remove staff from some stations completely. Reducing the hours staff would be available would have made it harder for passengers to access advice and information from staff.

*“My local station, Whitton, will be severely impacted in a negative way. At present, the ticket office is open 7 days a week, on 6 of those days from early morning into the evening. The SWR consultation proposes that a staff presence is only available on 5 days, for 4 hours each day (virtually all in the morning). That does not square at all with the claim in the consultation to have “Greater customer service in action”. South Western Railway passenger*

We were pleased, therefore, that the revised proposals from most train operators did at least propose restoring staffing hours to current levels. However, even then it wasn’t always proposed to retain the same number of staff as currently.

The public response to the consultation highlighted a widespread concern that the closure of ticket offices would lead to further significant changes at stations with no consultation. This is because the ticket office regulations would not apply in situations where there is no longer a ticket office at the station.

There were particular concerns about what this would mean for future staffing levels. Many people were worried that train companies would make further cuts to staff levels if existing regulations and protections were removed, further worsening the quality of service. Additionally, some feared that any mitigations promised during the consultation may not be implemented or could be removed after the initial transition period.

*“I have heard the argument that closing the ticket offices will free up the staff to help on the platforms, but I don’t believe that that will last. Instead I think it will be a prelude to the staff losing their jobs or, at best, not being replaced if they choose to leave.”* GWR passenger

*“I suspect once the ticket offices go, gradually all staff will go too. That’s wrong. We need officials there to help and give us some security.”*  
Chiltern Railways passenger

The rail industry has argued that this concern could be addressed through the current arrangements under which operators comply with an Office of Rail and Road (ORR) approved Accessible Travel Policy (ATP). The ATP process is formally regulated and enforceable by the ORR as part of an operator’s licence and requires train companies to have clear measures in place when considering changes to station staffing levels to ensure the continued provision of unbooked assistance for passengers. Material changes at a station (which include staffing) must be reported to ORR, and operators must confirm that they have sought and considered feedback from local groups such as their passenger panel, accessibility forum and local user groups, as appropriate. Should significant or material changes be made to a revised ATP, the ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC) and the relevant passenger body (Transport Focus and/or London TravelWatch).

While it was good that the industry has now recognised there is an issue here, the ATP proposal 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. If this route were to be pursued further, it would require modifications to the ATP guidance, including a commitment to consult on specific changes to staffing at both an individual station level and more widely, with a clear process for doing so.

## **Access to products**

A frequent concern expressed by passengers in their responses was the impact of the proposals on their ability to access the tickets and products for their journey. A significant number of passengers told us that they relied on ticket office staff for help to do this, predominantly to assist them buy the correct ticket at the best price but also for a range of other services, such as issuing refunds and replacing faulty tickets.

*“I personally normally use the ticket office when buying tickets as I need the advice and help to make sure I get the right one.”* South Western Railway passenger

*“I recently accompanied an elderly friend to Cheshunt Station to help her buy a return ticket to Cambridge for a family party. The ticket office staff ensured she got the best price.”* Greater Anglia passenger

*“I often have complicated journeys and need the help of the ticket office staff to advise me of the simplest and cheapest way to journey.”* Govia Thameslink Railway passenger

*“Due to the complicated system of railway tickets it is not easy to determine what is the cheapest route nor any discounts applicable if more than one person travelling. If you are a single person just getting a train into London it is very simple to use your debit card. If there are 2 adults and 2 children travelling to Southend e.g. there are too many variables to confidently know you have selected the cheapest option.”*  
c2c passenger

We share the view expressed by the Transport Select Committee that it is “perplexing” that the rail industry put forward proposals before the promised simplification of fares and ticketing has been delivered.<sup>4</sup> 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 only happen after fares reform has taken place and shown to be a success.

Using TVMs at stations was put forward in the proposals as the key alternative to buying tickets at a ticket office. However, consultation respondents highlighted numerous concerns with TVMs, especially when comparing them with the service provided when buying tickets from ticket office staff. We were told that TVMs don't offer all tickets and so the absence of ticket offices would mean that these tickets would not be available to buy at stations.

*“Ticket machines do not offer refunds, season ticket changes, ranger / rover tickets, ferry/bus connections, park and ride, group save, disabled persons discount, long-term season tickets, combination season ticket & travel cards for those commuting to London, advance fares, rail card purchases, off-peak tickets before 9.30am, changes to ticket classes, seat reservations, cycle reservations, photocards for season tickets, scholar tickets and sleeper bookings.”* South Western Railway passenger

We were also told frequently that TVMs could be impossible to use because they were not working and passengers wondered what they were meant to do in those instances.

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<sup>4</sup> Transport Committee letter to the Rail Minister:  
<https://committees.parliament.uk/publications/41805/documents/207168/default/>



*“I'd also like to ask what happens when ticket machines are out of order/service, as they frequently are. My local station is Bickley and I am often unable to use the machine because it is not working, which means the ticket office would be the only resource to enable travelling legitimately.”* Southeastern passenger

As will be discussed later in this report, there were also concerns that not everyone could use TVMs due to their inaccessible design and confusion about how they work or how to get the right ticket from them.

The rail industry's push to encourage more ticket sales online as part of this consultation also gave us some concern. National Rail Enquiries and some train operators' 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. Given this, encouraging more people to buy tickets online risks directing passengers to more expensive fares than they need to pay. London TravelWatch has raised this concern with the Rail Delivery Group (the organisation that works on behalf of the rail industry) but there is not yet an agreed “fix” nor a firm timescale for introducing it. London TravelWatch believes a solution must be put in place successfully before we could support ticket office closure proposals.

Where passengers can buy their tickets from a TVM, we had questions about the ability of TVMs to meet the retail capacity needed at many stations if ticket offices closed, particularly those where ticket office sales remained relatively high, especially at peak hours. This would mean customers risked facing significant queues to buy tickets. If TVMs could not cope with the additional demand, passengers may be faced with unacceptable queues to buy tickets, which could lead to increasing instances of them missing trains or boarding without a ticket.

*“We particularly use Stevenage and Hatfield stations and had the experience of a massive queue at Hatfield when attempting to use the machines. Nearly everybody was having trouble making them work and a number of people were getting agitated and ended up missing the approaching train.”* Govia Thameslink Railway passenger

The other main option suggested in train operator proposals was for passengers to buy their tickets online before arriving at the station. We recognise that increasing numbers of passengers are switching to purchasing tickets online rather than at the station but not everyone is able to use these methods if, for example, they do not have internet access or the tools are not accessible. In research from earlier this year, one in six people told London TravelWatch that they are unable to buy a ticket as they can't use or don't have access to a smartphone or internet connection - the equivalent of more than 1.5 million Londoners.<sup>5</sup> Even when access to digital channels is available, many people still feel that the complexity and variety of ticket options means they do not feel able or confident enough to book their tickets without assistance from staff.

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<sup>5</sup> Left Behind Londoners - Digital Exclusion and Disadvantage in London transport: <https://www.londontravelwatch.org.uk/campaigns/digital-exclusion/>

*“Not everyone has internet access or can afford it. The train booking apps do not give enough flexibility and I have, on a number of occasions over just the last year, had to resort to using a telephone or going into a ticket office as it has not been possible to do what I want to do online.”* Greater Anglia passenger

*“Disabled people are much less likely than non-disabled people to have internet access, so online ticketing is not accessible for many.”* Southeastern passenger

There were concerns that all the above issues would make it harder for passengers to buy the ticket they need before they board the train. This could result in people being unfairly penalised for not having a valid ticket, which they were not able to purchase through no fault of their own.

*“I understand that it is a criminal offence to travel without a ticket on the trains - these proposals will inevitably lead to very many people having to break the law in order to travel to work, and cause all sorts of knock-on problems further up the line on arrival at London Terminals. Plus, some heavy-handed train/station operatives will see this as an excuse to charge full or penalty fares- leading to many disgruntled passengers.”* South Western Railway passenger

*“As a freedom pass holder living in London I purchase train tickets from the boundary of Zone 6 to my destination. These tickets are not available in ticket machines. Should the closure go ahead it will prove very inconvenient or impossible to break my journey at one of the few remaining stations with ticket offices to buy a ticket. I will then face the worry of travelling without a ticket, and the possibility of incurring a penalty fare.”* Passenger of multiple train companies

*“If ticket machines are out of order I would not be able to risk travelling as I might incur a penalty fare (how would staff at the destination station know that there were no working machines where I boarded the train?)”* Govia Thameslink Railway passenger

In response to this, train companies committed to keeping portable ticket machines at stations that staff could use to sell tickets not available on TVMs, to make sure passengers have the same opportunity to buy tickets in person as they do now. While this was welcome, we would note that the capability of the machines varied by train company, with some requiring a cumbersome process to use, and some still not selling all tickets that are currently available at ticket offices. We also recognised that ticket inspectors have some discretion when passengers have issues using TVMs, but remained concerned that this could result in uncertainty and varied experiences for passengers.

## **Accessibility**

We know from people’s responses to the consultation that there was much concern about the potential impact of the proposals on those who required assistance when accessing the railway. Many people feared that the proposals would end their ability to access Turn up and go assistance and could even jeopardise pre-booked Passenger Assistance.

*“My local station is Welwyn North. My husband is in a wheelchair and needs assistance boarding trains. Disabled people should be able to turn up and go, just like the rest of us.”* Govia Thameslink Railway passenger

There was also concern about the proposals by some train operators to have ‘roaming’ staff (i.e. staff not situated at a fixed point in the station), with the impact this would have on passengers.

*“The proposal for ‘roving’ staff, not based in the ticket office is simply not good enough - the disabled, the blind, the deaf and those with other similar impairments or vulnerabilities need staff they can easily locate and communicate with in a sure and certain manner.”* Greater Anglia passenger

*“If staff members are not in a fixed location they will be difficult to find and queues for staff attention will be likely to clog up free movement.”* Govia Thameslink Railway passenger

We were therefore pleased that many train operators revised their proposals so that staff would remain based in fixed locations close to TVMs and/or the main concourse area in stations rather than be in a roving role.

As a constructive response to concerns about the potential impact on accessibility of ticket office closures, train operators also proposed an industry-wide concept of Welcome/Meeting Points. 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 required 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.

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/trialed to establish what works best at different types of stations and for passenger feedback on them. Our approval of the proposals on ticket offices would need to await the outcome of these pilots.

In terms of other accessibility issues, we were told by passengers that TVMs could be difficult or impossible to use as they were inaccessible in their design, too complicated to understand or even because of where they were located at stations:

*“Ticket machines do not meet many passengers’ needs. Poor eyesight, lack of manual dexterity, some disabilities, cognitive impairments, limited language skills, difficulties in reading and many other conditions require human assistance.”*  
Greater Anglia passenger

*“TVMs are not accessible for many disabled people.”*

South Western Railway passenger

*“The requirement to use ticket machines is unworkable when the machines are so slow, unreliable and prone to malfunctioning. I have previously counted that it requires 13 button presses to get to a standard off peak return ticket which I used to always buy.”* Chiltern Railways passenger

*“The ticket machines are both facing directly into the sun, and people with impaired sight have difficulty using them. I have this problem, and have good eyesight.”* Govia Thameslink Railway passenger

*“I regularly travel from a relatives home on another operator's line, where I have yet to see anyone master the ticket machine. It is usually surrounded by confused people.”* c2c passenger

Passengers were also concerned that a reliance in future on TVMs would affect their ability to pay by cash because some TVMs didn't offer the option to pay by cash. We were also told that even those TVMs which were set up to accept cash payments weren't always working properly and so at times did not accept cash.

*“Many ticket machines do not take cash, disadvantaging the many people who still need or prefer to use cash, and inconveniencing those who find their cards are not accepted due to machine faults.”* Greater Anglia passenger

Given this, we were pleased that many train operators revised their proposals to ensure that staff would still be able to accept cash even if ticket offices closed.

## **Safety**

It was clear in the responses received during the consultation that a significant number of passengers were concerned about the impact of proposals on safety:

*“Railway stations with no staff can be extremely lonely and threatening environments at which to arrive. I am against any staff reductions that leave passengers at risk, particularly vulnerable or older people.”* Southeastern passenger

*“Safety is another pressing issue. In case of emergencies, such as accidents or natural disasters, local ticket stations play a pivotal role in coordinating responses, guiding evacuations, and ensuring public safety. The closure of these stations could leave communities vulnerable, with inadequate resources to manage crisis situations effectively.”* c2c passenger

This chimes with research into passenger priorities by Transport Focus, which found that in 2022 personal security was the highest station-based priority for passengers.<sup>6</sup>

A range of issues, perceived and real, were raised in the consultation. These included:

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<sup>6</sup> Britain's railway: what matters to passengers. Transport Focus, 2022

- Fears that where staff are reduced or removed completely anti-social behaviour and crime may increase, as staff members currently act as a deterrent.
- Security concerns around being able to identify members of staff. This was particularly pertinent for blind and visually impaired passengers, as without the member of staff being in a ticket office there are lack of accessible ways to confirm their identity. This increases the risk of scammers impersonating station staff, for instance to gain access to passengers' payment methods and/or personal phone when making purchases.
- Not being able to quickly and easily find a member of staff to help when a safety or security issue is occurring, for example if someone has fallen onto the tracks or a crime is taking place.

There were particular concerns about the safety impact on certain demographics, most notably women and Disabled passengers:

*“If a visually-impaired person seeks help, how are they to know that the person offering help is bona fide? Are they expected to hand over their bank card to a stranger who might be a scammer?”* Avanti West Coast passenger

*“If you are a lone female like myself and it's dark and there's no one there you will feel vulnerable.”* London Northwestern Railway passenger

*“I am blind in one eye and partially sighted in the other, as well as having mobility problems. I still like to get out and to travel by train but can only do this with help from your Rail workers in assisting me with directions etc AND giving me the assurance of safety.”* Southeastern passenger

London TravelWatch's 2022 research which looked at personal security on London's transport network found that women and disabled users were more likely to feel unsafe.<sup>7</sup>

Passenger safety is an important part of travel, and even the perception of a lack of safety can have a significant impact on people. Throughout our research we've had people tell us that feeling unsafe changes how they travel, to the extent that people will avoid travelling completely at certain times.

While good lighting, CCTV, clear sightlines, the availability of help points, and a well-maintained environment can all help people feel safer, it was clear that for many passengers a visible staff presence across the network is key. Staff can provide reassurance and assistance, improve perceptions of personal security and act as a deterrent to crime and disorder.

Under a number of the original ticket closure proposals, staff numbers and/or hours would be reduced, and some stations de-staffed completely. However, revised proposals from train companies in most cases restored proposed staffing hours to current levels, which should provide reassurance to passengers (though issues remain for proposals where they have not been fully restored). Indeed, in some

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<sup>7</sup> Personal Security on London's Transport Network Recommendations for safer travel. London TravelWatch, 2022

instances, having a more visible staff presence (for example, staff out from ticket windows) could improve perceptions of safety.

Train companies also agreed to complete a Crime and Vulnerability Risk Assessment (CVRA, produced by the Department of Transport in collaboration with the British Transport Police) of proposed ticket office closures. While this is welcome, London TravelWatch's view is that this should be done, with risks identified and mitigations implemented, before proposals can be approved.

### **Future monitoring**

As has been discussed, there was a clear scepticism amongst many passengers that the proposals to close ticket offices would improve the services they receive.

*“Your proposals may save you money but they will reduce customer satisfaction which may ultimately further reduce passenger numbers.”* Greater Anglia passenger

While industry maintained that these proposals would improve the customer experience, 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.

Most train companies noted that they planned to evaluate their retail proposition using data from things such as their customer insight channels, customer satisfaction surveys and external survey work. There was also at times an understanding that there was work to be done in this area, with some train companies committing to reviewing the monitoring and metrics required to support any changes if the proposals are accepted.

We also noted that the Rail Delivery Group (RDG) said that, to ensure an impartial baseline and assessment of the proposals is available, operators proposed to use the National Rail Passenger Survey previously conducted by Transport Focus. 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, that there was considerable work yet to be done by industry to agree which specific core metrics will be used 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 have seen some indication of the expected future movement in the measured scores to support each train company's view that the proposals would deliver an improvement in one or other aspect of quality of service. The arrangements for future monitoring of implementation would need to be agreed with us and in place before we could endorse the proposals.

### **Cost effectiveness**

Under the TSA, cost effectiveness is one of the specific criteria we were asked to consider in assessing the proposals. While again the general view from train companies was that their proposals would save money, again there was doubt from many people who responded to the consultation. This generally came down to the view that the proposals would make it more difficult for people to travel by rail, and so deter passengers from travelling by train. This in turn would lead to a fall in revenues from fares – with any cost savings from the proposals being outweighed by these losses.

*“I am concerned that a number of travellers including my elderly parents and those who are visually impaired will be discouraged from travelling by train if this automated, unhelpful system is the only way available to purchase a ticket at most stations.”* Greater Anglia passenger

*“If you close the ticket office / Customer Centres, I will be unable to travel. It is that simple.”* South Western Railway passenger

*“All this revenue will be lost but more importantly, all these passengers will either not travel by train or will be massively overcharged by having to buy multiple tickets from multiple sources.”* Govia Thameslink Railway passenger

*“All you will achieve with me is to further reduce my use of your ever more costly services.”* Greater Anglia passenger

In response to our request for details to demonstrate the cost effectiveness of industry proposals, train companies provided little concrete information. However, RDG provided a statement which, among other things, said that a business case had been reviewed by the DfT and that specific details of the business case were commercially confidential.

We understand that some of the information may be sensitive, but we find it extraordinary that the industry has not been able to find a way, at an individual train company 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 was all the more remarkable given the emphasis that had 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 could not with confidence judge whether the proposals would represent an improvement on current arrangements in terms of cost effectiveness. We therefore had little option under this category but to object to the proposals.

## 5. Final Decisions

In light of the above issues, we did not believe that the proposals met the criteria under which changes to ticket offices may be made, and so on 31 October 2023 London TravelWatch objected to all of the proposals to close ticket offices.

The full decision letters for each train company are available on the [London TravelWatch website](#)<sup>8</sup>, and contain more information on points specific to their individual proposals. We have structured these around the assessment criteria to show how the decisions align with the guidance given.

Following the publication of our decision letter, the Secretary of State for Transport asked train companies to withdraw their proposals, and so none of the planned changes will be made.

## 6. Next steps

We believe this process has highlighted the importance of consultation and public engagement. Train companies significantly revised their proposals in response to passenger and stakeholder feedback, resulting in a range of positive changes. While the proposals were still ultimately not taken forward, it nonetheless demonstrates the benefits that consultation engagement brings, and the importance of such a mechanism.

It has also shown the strength of the criteria that must be met for changes to ticket office opening hours to be made, helping to make sure that proposals truly work for passengers. Considering the proposed changes holistically, as this requires, is a good thing, and we are glad that the DfT updated the guidance to reflect this in 2022. While some changes to the process may be needed, as discussed later, we believe these criteria should remain in place.

In response to concerns about the changes, train companies made significant revisions to their proposals. Some of the most notable of these included (in most cases) a commitment to keep staffing hours as they are currently and retaining machines that staff can use to sell the full range of tickets. These were very welcome changes, but we are conscious that this meant the final proposals were substantially different to those which the public had been consulted on. Additionally, people were not aware of the alterations until the final decisions were made.

While the proposed ticket office closures are no longer proceeding, we hope that train companies will continue to further develop and implement the positive improvements discussed during this process. This includes commitments to improve TVMs, the introduction of services such as Welcome Points, and changes to the

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<sup>8</sup> <https://www.londontravelwatch.org.uk/london-travelwatch-objects-to-ticket-office-proposals/>



National Rail Enquiries website and train companies' websites to make it easier to find the cheapest fare. This would all benefit passengers regardless of changes to ticket offices.

However, this exercise has also revealed some flaws in the process. While the process has worked previously for proposed changes at a small number of stations, there is a lot to suggest that it is not suitable for such a large scale consultation.

This consultation combined wider issues of workforce reform alongside specific changes to ticket office opening hours. What this meant in reality was that, while under the TSA there is technically a separate consultation for each station where changes to a ticket office are proposed, many people wanted to respond to the wider policy of ticket office closures across the board. The station-by-station process set out in regulation made this more difficult for passengers.

It has therefore been argued that the two should have been split – with a separate consultation on the principle of closing ticket offices/retailing at stations, followed by a specific consultation on changes to opening hours for each station.

Additionally, as discussed previously, there were extensions to both the public consultation period and the period for the passenger bodies to come to their final decisions. This again indicates that the process outlined in Schedule 17 needs to be reviewed. In any future consultations, both the public and passenger bodies must have adequate time to fully and thoughtfully respond to proposals. This should be supported by alternative formats and thorough EqIAs available to the public from day one of any future consultation, so people can make informed submissions.

We also raise the question of when the consultation and engagement period begins. While London TravelWatch was on a general level made aware of plans to close ticket offices prior to the public announcement, we believe there could have been more in-depth engagement. While the Schedule 17 guidance explicitly calls for train companies to engage with Transport Focus and/or London TravelWatch early in the process, few companies actually did this in a meaningful way. Our understanding is that there was also limited outreach to other stakeholders such as representative organisations and charities.

Better and earlier engagement could have resolved some of the issues that were raised by passengers and stakeholders during the formal consultation period. Indeed many of the issues London TravelWatch raised with the Rail Delivery Group had not been resolved by the time proposals were put forward. Doing more work with organisations with expertise on these matters could have prevented several problems arising in the first place, and resulted in a set of proposals that may have worked better for passengers.

Along with the EqlAs, the Major Changes template was the key source of information for train companies to detail their proposals. Whilst we acknowledge that this was the first occasion in which this template was used for ticket office consultations, there was a significant variation in the quality of information provided by the train companies. This led to the need to request clarifications and additional sources of information in answers to questions or further data to complete the picture. This made the process more resource intensive than it should have been and brought into question a consistent approach across all train companies, something which the template had been introduced to ensure. Additionally, when undertaking our analysis there were at times wider issues that needed to be considered alongside the proposals, for example broader changes taking place in a station. This information was often not in the initial documents provided, resulting in multiple requests for clarifications or additional information and discussions around what was in scope.

We therefore would encourage industry and the Department for Transport to review the relevant parts of the TSA in due course, with the involvement of passenger bodies, given our role in the process. Changes should then be implemented as needed to make sure that any future consultations work well and result in the best outcomes for passengers.