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1. Passenger Focus

Passenger Focus is the independent public body set up by the Government to protect the interests of Britain's rail passengers, England's bus and tram passengers outside London and coach passengers in England on scheduled domestic services. We are funded by the Department for Transport (DfT) but operate independently.

Our mission is to get the best deal for passengers. With a strong emphasis on evidence-based campaigning and research, we ensure that we know what is happening on the ground. We use our knowledge to influence decisions on behalf of passengers and we work with the industry, passenger groups and government to secure journey improvements.

Passenger Focus is pleased to have engaged with the Department for Transport from an early stage in this franchise replacement process. We have used discussions to highlight key passenger issues and the findings of our research on InterCity East Coast routes and a range of topical issues.

Passenger Focus now welcomes the opportunity to provide further input from a rail passenger's perspective as the specification for the InterCity East Coast franchise is developed.

2. Introduction

Passenger Focus believes that when the requirements of the InterCity East Coast franchise are established it is vital that the needs of passengers who use and pay for rail services are placed squarely at the heart of the contract. This document sets out many important issues that should be addressed in the franchise specification, and by bidders before the contract is let.

This consultation response develops and expands upon the themes set out earlier this year in our submission to the Department of Transport (DfT)¹. It is informed by:

- Bespoke research into passenger priorities carried out in 2009 to inform the previous franchise specification exercise. This had a sample size of 6293 and covered four main routes/areas within the East Coast Franchise:
 - Peterborough and the East Midlands (sample 242)
 - Yorkshire (sample 1,883)
 - North East England (sample 751)
 - Scotland (sample 853)
- The National Passenger Survey (NPS).
- Passenger complaint data (complaints received by Passenger Focus).
- Generic subject specific research (as referenced within the text).

Feedback received from passenger and stakeholder groups has also provided information about local issues and challenges and has aided our understanding of the context in which the franchise will operate.

¹ *What passengers want from the East Coast rail franchise – an initial submission from Passenger Focus*. May 2012. See Appendix A and B for the 2009 route based and qualitative research

3. Summary of key points and recommendations

This section provides a summary of the key points and our main recommendations for the InterCity East Coast franchise.

Evidence base and passenger priorities for the franchise

Our response to the East Coast franchise consultation draws on bespoke research with passengers, National Passenger Survey (NPS) findings and other themed research. It builds on ongoing discussions with the DfT regarding the new franchise and an initial submission made in February 2012². Details of relevant research are referenced within the text.

Franchise scope and objectives

We are pleased to see the emphasis placed on improving service quality, information provision and passenger security in the objectives of the franchise; and on improving the overall passenger experience *throughout* the life of the franchise. With longer franchises it is particularly important to deliver continuous improvement.

Any decisions to transfer trains/services from other franchises to East Coast must be based on the outcomes this would deliver for passengers and not just on cost and administrative benefits. If services from other franchises are to be 'bolted' onto the franchise it will be essential that there is no loss of focus on existing services and passengers.

Franchise specification

Passenger Focus considers the East Coast franchise should have a strong and sufficiently detailed specification to protect both Government/taxpayer and passenger interests. Whilst the specification will be designed to allow a more flexible approach, it is necessary to protect key journey opportunities, recognising that train services deliver important economic benefits and connectivity which may not be adequately provided by decisions based on purely commercial factors.

There will undoubtedly be changes to train service provision during the franchise and there must be a requirement for a timely, transparent, meaningful and robust consultation process that allows all stakeholders views to be listened and responded to prior to changes being finalised or implemented.

Performance targets

The overwhelming driver of passenger satisfaction on East Coast, as it is nationally, is the punctuality and reliability of trains.

We recommend that the franchise includes:

² *What passengers want from the East Coast rail franchise – an initial submission from Passenger Focus. May 2012*

- Greater operational focus on moving to ‘right-time’ arrival at all stops, together with a requirement for publication of detailed performance information which will inevitably act as a catalyst to improvement.
- Challenging but achievable Public Performance Measure (PPM) punctuality targets for the franchise as a whole and key service groups.
- Punctuality targets should be disaggregated to the maximum extent possible to be meaningful to passengers. This should include (as a minimum) reporting on all identifiable routes and service groups; ultimately we see no reason why passengers ought not to be able to identify performance of individual trains – and at the station they use, not just at the train’s destination.
- Challenging but achievable targets for reductions in the number of trains reaching their destination more than 20 minutes late, but without resorting to extended journey times.
- A requirement to report performance of trains arriving at key intermediate stations.

Frequency and getting a seat

Being able to get a seat, journey speed and the frequency of trains were the third, fourth and sixth highest priorities for improvement in Passenger Focus’s September 2009 research. However, while changes introduced in the May 2011 timetable have made some improvements we believe there is still scope for improvement in terms of:

- frequency of service on Saturdays
- later-evening trains on weekdays from London Kings Cross and from Newcastle
- earlier services on Sunday mornings.

We are pleased that the consultation recognises the value of through services north of Edinburgh.

Service quality, targets and transparency

We have long-advocated greater use of qualitative targets within a franchise. Our strong preference is for targets based on what passengers think, the best judge of quality being those who have used the services in question. The National Passenger Survey (NPS) is ideally suited to capture this information.

Disaggregated targets for all measures should be set, and performance against them published widely. There should be a requirement for the franchise operator to commit to high levels of transparency about all aspects of the franchise, including operational performance and service quality.

Fares, ticketing and ‘smart’ technology

Whilst ‘smart’ technology will enable an enhanced offer of ticketing products and services, there is a wider agenda about fares, retailing and revenue protection that must be considered for the new franchise.

Passenger Focus has conducted extensive research with passengers on fares, ticketing and value for money and has identified many issues that remain to be adequately addressed. We set out a number of key issues for the franchise within the response and in a detailed appendix.

Revenue protection, penalty fares and unpaid fare notices

An effective strategy for revenue protection is important for the new franchise. However, this strategy must provide safeguards for those who make an innocent mistake and whose intention was never to defraud the system

Dealing with disruption and provision of information

Bidders must be required to show and be assessed against the practical steps they will take to improve how passengers are looked after during service disruption, particularly demonstrating their focus on people rather than processes.

This must include planned disruption and, in particular, a commitment to reduce the volume of bus replacement services.

Improving the passenger experience

Passenger Focus research on stations consistently demonstrates that, in addition to station facilities, there are two key factors that operators need to consider when thinking about how to improve passenger satisfaction with stations: information and staff.

The pressure on the industry to reduce costs inevitably places a focus on the overheads associated with staff. However, Passenger Focus is concerned that bidders for the franchise do not overlook the very significant roles that staff play and the value that passengers attach to a visible staff presence, especially at stations.

To improve security and safety Passenger Focus recommends that the franchise specification should include CCTV and linked help-point provision at all stations that do not currently have these facilities. Passenger Focus also supports accreditation of stations and car parks through the established industry schemes.

Accessibility

Passenger Focus recommends that the franchise specification should include a requirement for the operator to audit the accessibility of stations and establish a minor works fund.

In addition to the provisions set out in Disabled People's Protection Policy (DPPP) guidance, Passenger Focus believes the franchise specification should also require a number of specific provisions, which are set out in the response.

Complaints Handling

It is important that the specification for the franchise seeks detailed information from bidders about their policy and procedures for dealing with complaints. These should demonstrate a clear commitment to best practice and a process for handling legacy complaints (i.e. from the previous franchisee). We also believe that bidders need to look at the volume of appeal cases that reaches Passenger Focus – in the year ending March 2012 we received more complaints about East Coast than any other company.

4. The consultation questions

Many of the consultation questions are inter-linked or are influenced by common themes. In the following sections we have grouped various points together where we believe topics are related or we wish to make a number of similar arguments in our response.

Question 1: Do consultees agree that the proposed franchise objectives are an appropriate expression of the priorities that should apply to the new ICEC franchise?

Passenger Focus welcomes the emphasis placed on the passenger in the objectives. This is both in terms of punctuality/reliability and through commitments to improve service quality, information provision and passenger security. We are also pleased to see the emphasis on improving the overall passenger experience *throughout* the life of the franchise – with longer franchises it is particularly important to deliver continuous improvement.

We note the references to affordability and cost-effectiveness within the objectives. We recognise the importance of delivering value for money for taxpayers as well as passengers and the need to increase the efficiency of the rail industry. We made a detailed response³ to Sir Roy McNulty's rail value for money study, highlighting the important issues from a passenger perspective.

We are supportive of strategies which enhance efficiency and create closer collaboration, reduce duplication and overlap, and generate further income by increasing the attractiveness of rail. There are, though, some legitimate anxieties expressed by passengers about cost-cutting, particularly the availability of staff and ensuring that station facilities are available whilst trains are in service. Reducing costs through genuine improvements to efficiency will largely be welcomed but there will be negative impacts if this simply results in wholesale cutbacks that impact on reasonable passenger expectations and a quality of experience that makes the railway a viable and safe environment in which to travel.

We believe it is essential that the 'post McNulty' debate does not get lost in too narrow an assessment of cost. Efficiency and cost are important as they clearly have a direct impact on the range of services offered to passengers and the fares charged, but cost savings must also be set alongside the value of rail to the economy and the country as a whole. Demand for rail has soared in the last 15 years with passenger numbers now being at levels last seen during the 1920s. If this growth is to be sustained then it will be essential that the benefits of rail are taken into account in any debate as well as the cost of provision.

Question 2: Are there any other issues that consultees believe the Department should take into account in determining the length of the new ICEC franchise?

Whatever the length of the franchise we think it is absolutely essential that there is a robust mechanism for removing poorly-performing operators. It would be unacceptable for

³ *The Rail Value for Money Study A Passenger Perspective: Comments by Passenger Focus, July 2011*

passengers to have to wait for the contract to expire before getting rid of an under-performing operator. Traditional franchise targets have tended to focus on the relatively 'hard' measures of punctuality and crowding. We have argued that service quality is also important - and becomes even more so in the context of longer franchises. For instance, it is possible for a train company to meet its punctuality and cancellation targets whilst offering a poor passenger experience e.g. dirty trains, unhelpful staff, or not keeping passengers informed. Such targets should also count towards any assessment of a TOC's suitability to continue.

Question 3: What are consultees views on the principle of the new ICEC franchise becoming a multi-purpose operator along the route of the East Coast Main Line rather than focusing only on the InterCity services provided by the current operator?

Question 4: Do consultees have any comments on which services might be considered for inclusion in the new ICEC franchise and how they might be specified?

Passenger Focus has not tested the proposition of a transfer of services from other operators to Inter City East Coast. However, in recent research with passengers on Northern/TransPennine Express routes we explored passenger attitudes to both brand loyalty to operators and potential devolution of rail responsibilities. The principal findings from this research indicate clearly that passengers' requirements focus on the delivery of an effective service rather than who runs the rail operation.

The significant issue to be assessed in any consideration of transfer of trains/services from other franchises to ICEC must be the outcomes this would deliver for passengers. Almost inevitably there would be both benefits and drawbacks to such a transfer and the overall balance of these on the majority of passengers must be the key to any decision. There should also be a transparent evaluation of the costs of any re-organisation and clarity about how they will be met. Passengers should not have to bear the price of a transfer initiated principally to increase the stability of another franchise – administrative and engineering simplicity must not outweigh passenger benefits.

However, the East Coast franchise is a predominantly long-distance operation with staff experienced in operating a specific fleet of trains and serving a distinctive market segment. Transferring services from another operator – particularly a suburban commuter operation – means coping with a qualitatively different fleet operating entirely different services. Any such proposals must be carefully appraised from a passenger perspective. It is essential that there must be no diminution of the existing focus on, or resources for, East Coast services should a new 'division' be bolted on. Similarly, the attention to service delivery elsewhere must not be undermined by transfer to another operator.

Should other services transfer to East Coast, existing arrangements for passenger access to such things as discounted tickets for certain journeys (e.g. carnet products) need to be maintained or comparable products provided. Passengers should not suffer as a result of reorganisation.

The assumption should be that the current timetable and current level of passenger satisfaction should be regarded as the minimum requirement on any routes that are transferred into East Coast. It is unlikely that relying on commercial incentives alone will provide sufficient protection for rural and interurban routes. Finally, if service changes are proposed, either on initial transfer or subsequently, there must be timely, meaningful consultation with passengers and stakeholders.

Question 5: Are consultees aware of any other rail or non-rail development schemes that might affect the new franchise?

Transport authorities/consortia, Local Enterprise Partnerships and local groups will have knowledge of their areas and be well placed to detail specific factors that might influence future levels of passenger demand.

All opportunities to create synergy between rail and other development projects, and any potential to seek partnership funding and align delivery mechanisms with other organisations, should be seized, especially where this can improve the passenger journey as a whole, through integrated transport services and facilities.

Question 6: are there any research findings, evidence or other publications that consultees wish to bring to the attention of the Department as part of this refranchising process?

Passenger Focus is an evidence-based organisation and has produced research and reports on a wide range of topics relevant to this refranchising process, and to future operations under the new contract. We have provided the Department for Transport (DfT) and prospective bidders with a comprehensive listing of our research publications. We have also directly provided these organisations with particularly important reports and discussed with them, in some detail, our research into subjects most salient to this refranchise.

This research is set out in detail in our initial submission to the DfT⁴. We would reiterate the following:

Route based passenger research and priorities for improvement

Passenger Focus's September 2009 research asked over 6000 East Coast passengers about their priorities for improvement. The table below shows the overall results for the franchise as a whole. These are in line with similar work at a national level and mirror themes identified in more recent research to inform the West Coast and Greater Western franchises. So, even allowing for the time elapsed, this remains a relevant starting point for the new franchise specification.

⁴ *Ibid*

Table 1: Passenger Priorities for Improvement

Priorities for improvement	Rank (1=highest priority and 12=lowest)
Punctuality and reliability of the train	1
Value for money for the price of the ticket	2
Being able to get a seat on the train	3
Length of time the journey was scheduled to take (speed)	4
Facilities and services on board the train	5
Frequency of trains for this journey	6
Provision of information about train times/platforms	7
Personal security while on board the train	8
Personal security at the station	9
Ticket-buying facilities	10
Ease of getting to and from the station	11
Facilities and services at the station	12

East Coast Passenger Priorities for Improvement. 2009

National Passenger Survey data

The National Passenger Survey (NPS) results for spring 2012 have recently been published and Tables 2 and 3 provide the most recent information about passenger views on key elements of the InterCity East Coast franchise, broken down into the main service group. NPS data is also used to calculate the key drivers of satisfaction (see Figure 1). Where relevant we draw on NPS data in our response to the consultation questions.

Table 2 NPS satisfaction scores – overall and station factors

Overall Satisfaction and Station Factors (%satisfied)	East Coast score	Long Distance TOC score
NPS Spring 2012		
Overall satisfaction	89	88
Overall satisfaction with station	75	81
Ticket buying facilities	84	82
Information provision on train times/ platforms	87	86

Upkeep/repair of station buildings/platforms	65	73
Cleanliness of station	72	77
Facilities and services	58	62
Attitudes/helpfulness of staff	76	77
Connections with other public transport	80	76
Facilities for car parking	49	60
Overall environment	64	73
Your personal security	71	74
Availability of staff	67	66
How request to station staff was handled	85	89

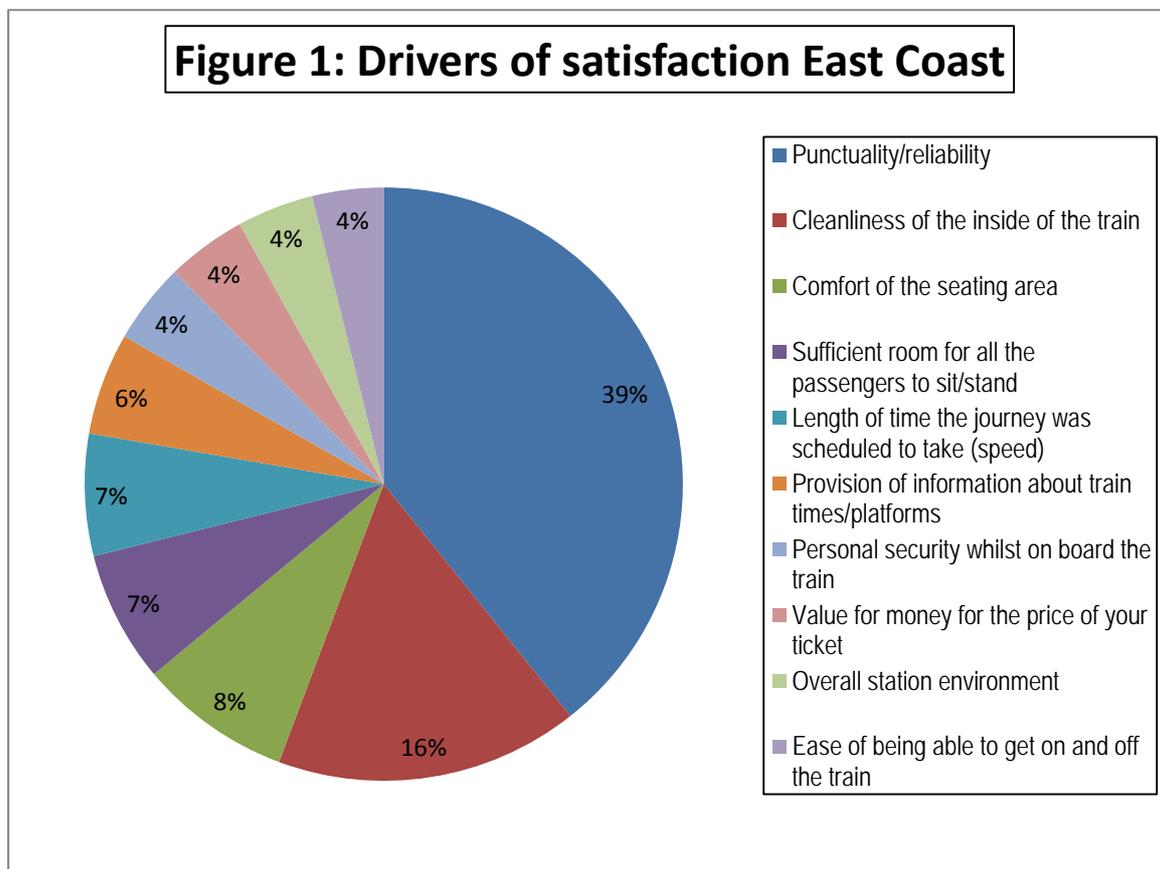
Table 3 NPS satisfaction scores – train factors

Train Factors (% satisfied)	East Coast score	Long Distance TOC score
NPS Spring 2012		
Frequency of the trains on route	90	85
Punctuality/reliability (arriving/departing on time)	88	87
Time journey scheduled to take (speed)	90	90
Connections with other train services	79	81
Value for money for price of your ticket	56	54
Upkeep and repair of the train	79	84
Information provision during journey	79	78
Helpfulness/attitude of staff on train	82	80
Space for luggage	63	56
Toilet facilities	52	52
Room for all passengers to sit/stand	79	73
The comfort of the seating area	79	79
Ease of being able to get on/off	83	85
Personal security on board	86	86
The cleanliness of inside	82	84
The cleanliness of outside	76	79
Availability of staff	72	68
How well train company deals with delays	63	55

Not all of the criteria measured by NPS will have equal importance in a passenger's mind - some things will clearly be of more importance in determining the overall level of satisfaction

than others. By identifying those factors that correlate most highly with overall satisfaction it is possible to identify the main drivers of passenger satisfaction.

Figure 1 shows the overriding importance of punctuality and reliability to passengers – something we explore in more depth below.



Based on autumn 2011 and spring 2012 NPS data.

Question 7: Consultees views are invited on the train service specification, including which aspects should be mandated by the Department and which can be left to commercial discretion; and also on whether or not there should be a change to the specified minimum service level when IEP trains are introduced.

Question 8: Consultees views are invited on the potential for the franchise to serve locations accessible from the East Coast Main Line which currently have limited or no direct services to London

Passenger Focus believes that the specification is the key to the entire franchising process. We note the DfT’s intention to provide greater flexibility for operators to respond to demographic and market changes and commercial opportunities. However, it is only against a sufficiently detailed specification that a TOC’s performance can be effectively monitored. And, in the worst case, it would be the standards set out in the specification that would provide the framework for determining if a TOC should be removed for poor performance. For the

Government to ensure it gets what it pays for with taxpayers' money there must be specification to set out what is required of the new operator.

Passenger Focus considers there is a need, therefore, for the East Coast franchise to have a strong and sufficiently detailed specification to protect both Government and passenger interests. This should allow intervention when required to ensure improvement and, as a final sanction, the removal of an operator that consistently fails to deliver the necessary levels of service.

Whilst the specification will be designed to allow a more flexible approach, it is still necessary to protect key journey opportunities, recognising that train services deliver important economic benefits and connectivity which may not be adequately provided by decisions based on purely commercial factors. It will also be important for separate provision to be made for weekdays, Saturdays and Sundays as there are significant variations in traffic flows and overall volume at weekends. A single one-size-fits-all approach will not provide sufficient protection.

We believe the specification should focus on journey opportunities. The key issue is whether passengers at each station have the required level of service to and from the places they want or need to travel at the times they wish to do so. The starting point should be the available opportunities provided by existing services and the aim should be to optimise these based on passenger demand. A minimum requirement should be established in situations where compromises are required to make an overall improvement for passengers.

There will undoubtedly be changes to train service provision during the franchise and there must be a requirement for a timely, transparent, meaningful and robust consultation process that allows all stakeholders' views to be listened to and responded to, prior to changes being finalised or implemented. Engagement with local communities should be regarded as a starting point for service developments.

We see the following as core aspects of the train service specification:

Punctuality

There can be no mistaking the crucial importance of punctuality and reliability to passengers. Figure 1 above shows the overwhelming driver of passenger satisfaction on East Coast, as it is nationally, is the punctuality and reliability of trains.

We referred in our initial submission to research⁵ showing that passengers' satisfaction with punctuality begins to fall from the point the train misses its scheduled arrival time rather than after the ten minute allowance on longer distance services allowed by the Public Performance Measure (PPM).

The research shows that passengers simply do not view a train arriving up to 10 minutes after its scheduled time as being on time. As punctuality is the main driver of overall passenger

⁵ *Examining the links between Customer Satisfaction and Performance East Coast*

satisfaction it follows that moving to a 'right-time' railway could help drive up overall satisfaction.

We believe that Britain's railway must in future focus more on 'right-time' arrival at all stops. We would like to see a commitment to this in the new franchise. We also want to see a requirement for the publication of detailed performance information, something which will inevitably act as a catalyst to improvement.

We would also reiterate the previous recommendations⁶ to drive improved performance in the franchise:

- Challenging but achievable PPM targets for the franchise as a whole and key service groups.
- Punctuality disaggregated to the maximum extent possible to be meaningful to passengers. This should include (as a minimum) reporting on all identifiable routes and service groups; ultimately we see no reason why passengers ought not to be able to identify performance of individual trains – and at the station they use, not just at the train's destination.
- Challenging but achievable targets for reductions in the number of trains reaching their destination more than 20 minutes late, but without resorting to extended journey times.
- A requirement to report performance of trains arriving at key intermediate stations.

Frequency and getting a seat

Being able to get a seat, journey speed and the frequency of trains were the third, fourth and sixth highest priorities for improvement in Passenger Focus's September 2009 research. However, changes introduced in the May 2011 timetable have significantly changed the assumptions on which this research was based – e.g. an extra train per hour to principal stations, intermediate calls taken out of other services to speed them up, and greater use of a standard pattern of services.

Notwithstanding this there are several areas that we would like the new franchise specification to address:

- Whether an optimum balance had been achieved between the needs of end-to-end passengers and those making long-distance, but non-London inter-regional journeys. The completion of the Control Period 4 investment schemes provides an opportunity to look again at whether the fast Anglo-Scottish train can be stopped at Peterborough in most off-peak hours, restoring journey time and quantum of opportunities that worsened in May 2011. It should be noted that pre-May 2011 the 1100 Kings Cross to Edinburgh took four hours 19 minutes stopping at Peterborough, York, Darlington,

⁶ *What Passengers want from the East Coast franchise*

Newcastle and Berwick, five minutes *faster* than the current schedule of the 11pm from Kings Cross which has had the Peterborough stop removed.

- The scope for a higher frequency of service on Saturdays.
- The potential for later-evening trains on weekdays from London Kings Cross – e.g. the gap in departures between 10pm and 11.30pm and the lack of a midnight(ish) departure to Peterborough, Grantham and Newark.
- The scope for earlier services on Sunday mornings. Although the May 2011 timetable improved things for the long-distance stations (except Edinburgh) the first arrival is still after 10am rather than between 9am and 10am as on some other routes. For example, an 8am departure from Edinburgh to give a ‘lunchtime’ arrival at Kings Cross rather than ‘nearly 2pm’.
- The need for a later last train north of Newcastle. The last weekday train calling at Morpeth and Alnmouth is now 9.40pm Monday to Thursday, Fridays it is 10.42pm, Saturdays 9.38pm (Alnmouth only) and Sundays 9.51pm. One solution is for the 7.30pm Kings Cross to Newcastle service to be extended to Edinburgh on all nights of the week instead of just Friday.
- The absence of an 8.01am York to Kings Cross service and a 9.54am Newark to Kings Cross service, which leaves a gap in the standard off-peak service pattern in two key hours. For passengers at Retford, Newark, Grantham and Peterborough the standard pattern does not start until the 12.24pm arrival at Kings Cross
- The need to restore the Peterborough stop in the 6.19pm Kings Cross to Newcastle service, reinstating commuters and business passengers’ pre-May 2011 choice of services and ensuring that crowding does not occur on adjacent trains
- Bidders should also be required to present proposals to enhance the service to Harrogate (125,000 journeys to London per annum) and Lincoln (91,000 journeys to London per annum)⁷, passengers to/from the latter having been promised a train every two hours under the failed National Express franchise only for the plan to be abandoned by East Coast. Stakeholders frequently point out that the sole through train from Lincoln to London takes longer than several other options involving a change of trains at Newark.

We are pleased to see the commitment to continue with through services north of Edinburgh. As the consultation document states these offer important economic and social benefits. We also agree with Transport Scotland’s desire that timings for these services to/from Aberdeen and Inverness are reviewed to ensure that they are as convenient as possible for the majority of passengers.

⁷ Lennon 2009-10

We are mindful that the Intercity Express Programme (IEP) offers the next major opportunity to enhance capacity. However, as this rolling stock will not appear until 2018 onwards, it should not detract from efforts to improve capacity/reduce crowding in the meantime. We believe it is important that the specification requires the operator to monitor (and address) crowding over the life of the franchise. A key element of this is the provision of accurate loading data. We believe that there should be much greater public access to loading/crowding data.

Question 9: Are consultees aware of any ways in which improved ticketing, smart ticketing and passenger information might be provided?

Fares and Ticketing

Whilst 'smart' technology could enable an enhanced offer of ticketing products and services, there is a wider agenda about fares, retailing and revenue protection that must be considered for the new franchise.

Passenger Focus has conducted extensive research with passengers on fares, ticketing and value for money and has identified many issues that remain to be adequately addressed. We have recently submitted and published a response to the Government's rail fares and ticketing review⁸ which summarises our research findings and sets out the improvements we are seeking on behalf of passengers. Appendix 1 is extracted from the fares and ticketing response and provides our overall aspirations for fares, ticketing and value for money for the ICEC franchise.

We would emphasise the following key aspirations:

- *Single-leg pricing for the walk-up railway*
On many journeys passengers can commit to a firm outward travel time but are less able to fix the time of the return journey. Our research on business travel⁹ found this to be one of the main barriers for business passengers. Properly structured single-leg pricing allows passengers to use a mix and match approach to journey planning without being penalised by the disproportionately high cost of the off-peak single ticket (which may only be 10p or £1 less than the return fare). The existing franchise has introduced an element of single-leg pricing into the franchise for internet sales. We believe this should continue in the next franchise and be extended to non-London journeys through all sales channels.
- *Introduce an element of flexibility for Advance fares*
Allow Advance tickets to be 'upgraded' if a booked train is missed. Passengers should be able to pay the difference between what they have already paid and the price of the ticket valid at the time, subject to a reasonable administration fee. This would address

⁸ Passenger Focus response to the Government's rail fares and ticketing review. 2012

⁹ Employers Business Travel Needs From Rail. February 2009

the sense of grievance that many passengers feel when they are confronted with paying the full cost of the most expensive walk-up fare when they miss their train.

- *Improve access to Advance fares*

Ideally, passengers should be able to purchase Advance tickets at any time before a service departs. However, we recognise that this is not achievable with the rail industry's current systems. So in the interim we would like to see the cut-off time for the purchase of Advance tickets moved from 6pm to no earlier than midnight on the eve of travel. This would at least allow people to get home from work and plan their travel for the following day without automatically paying higher prices. Efforts must also be made to increase Ticket on Departure (TOD) schemes and e-ticketing as there are parts of the country where access to Advance tickets is dependent on delivery by post or involves a lengthy round trip to a station with reservation facilities.

- *Give passengers the information with which to make an informed purchase*

Ticket restrictions and validities must be supplied to passengers at the point of purchase. Passenger Focus's research on ticket-vending machines¹⁰ showed that some passengers struggled to buy a ticket from a machine as they were not provided with clear information to ensure they bought the correct ticket at the right price. This potentially results in passengers buying a more expensive ticket, using a 'better safe than sorry' mentality, or taking a chance on the cheaper ticket and risking a penalty or excess fare. We believe that validities should also be printed on the ticket itself to provide continuing reassurance to passengers.

- *Give passengers confidence they have bought the right ticket*

Bidders must think differently about ticket retailing: the onus should be on train companies and retailers to *sell* the right ticket and less on the passenger to *buy* the right ticket. Passengers need to be guided more effectively to the right thing for them, not have to guess from a baffling array of different tickets. The options to trade up for greater flexibility, onboard quality etc. and the options to pay less for reduced flexibility should be fully-transparent. The industry must make it far harder to overpay and should make it a selling point that if you do, the difference will be refunded.

Revenue protection and Unpaid Fare Notices

An effective strategy for revenue protection is important for the new franchise. Passenger Focus believes ticketless travel is an important issue - and one that needs addressing. Passengers who avoid paying for their ticket are in effect being subsidised by the vast majority of fare-paying passengers. It is right that the franchisee will take steps to deter, to catch and to punish those who deliberately set out to avoid payment.

However, the revenue protection strategy must provide safeguards for those who make an innocent mistake and whose intention was never to defraud the system. We have recently

¹⁰ *Ticket Vending Machine Usability. Passenger Focus. July 2010*

published a document¹¹ highlighting significant concerns that have arisen as a result of disturbing passenger experiences brought to our complaints team. These issues have been raised with the industry and we await the draft of a promised code of conduct from the Association of Train Operating Companies (ATOC).

While the overall issue is something that needs to be addressed with a whole-industry perspective, this should not deter bidders from tackling some of the underlying problems through the franchise process. This requires:

- Clear consistent guidelines explaining when staff should show discretion in the enforcement of penalties. For example when passengers do not have their railcard with them or when they are told by a member of staff that they can board a train without a valid ticket. We note that the current operator has introduced a 'discretion' policy for ticketless travel that addresses some passengers' concerns. This is welcome and is something we feel should be expanded and continued within the new franchise.
- Commitment not to go straight to any form of criminal prosecution unless they have reasonable proof that there was intent to defraud.
- Penalties that are proportionate to the actual loss suffered by the operator.
- Greater transparency surrounding the number of Unpaid Fare Notices being issued and the numbers being overturned on appeal.
- Train companies to retain overall accountability even when they have outsourced revenue protection to a third party. This must include ensuring fair and robust appeal mechanisms rather than just a reliance on the 'small print' of the contract.

Dealing with disruption and provision of information

Passenger Focus supports efforts by the industry to improve the management of disruption and also to raise standards of information provision. Research into disruption and passenger needs for information¹² has identified the problems to be addressed and shown how solutions may be found.

Passenger Focus recommends the following requirements be incorporated into the franchise to improve the management of service disruption and provision of information to passengers:

- Contractual targets to improve NPS satisfaction with the provision of information during the journey, and a strategy developed and implemented to improve NPS scores for "how well the train company dealt with delay" and "usefulness of information during a delay."

¹¹ *Ticket to ride, Passenger Focus, May 2012*

¹² *Delays and Disruption Rail passenger have their say, Passenger Focus, December 2010*
Reading station engineering works what passengers want, Passenger Focus, May 2011
Information: Rail passengers' needs during unplanned disruption, Passenger Focus and Southern, August 2011
Short and Tweet. How passengers want social media during disruption. June 2012
Passenger Focus assessment of online information provided to rail passengers during high winds. March 2012

- A facility for passengers to receive email, SMS text alerts and tweets free of charge warning them if disruption will, or is likely to, affect their journey with an associated requirement to achieve a strong level of uptake through marketing of the service.
- Full adoption of the Association of Train Operating Companies ‘*Approved Code of Practice: passenger information during disruption*’ and compliance with the Good Practice Guides on provision of passenger information, together with a programme of audit and mystery shopping to assess delivery on the ground.
- Active co-operation to be required with the programme to feed station customer information systems directly from Darwin, the national real time train running database.
- Ensuring that information systems are equipped to explain causes of delay from the revised list of industry-wide “agreed reasons” for delays and cancellations.

In addition, bidders must also be required to show and be assessed against the practical steps they will take to improve how passengers are looked after during service disruption, particularly demonstrating their focus on people as well as processes.

Question 10: Do consultees support the use of NPS scores to monitor and improve the service quality of the ICEC franchise? Are there any other approaches that might be more effective in securing improvements in customer experience?

Targets, measurements and monitoring are fundamental to delivering improvements to service quality. Passenger Focus strongly supports the principle of monitoring and improving service quality through a combination of NPS results and periodic reviews of TOC Key Performance Indicators (KPIs). Disaggregated targets for all measures should be set and performance against them published widely. A financial penalty regime should apply with resources ring-fenced for additional investment into service quality measures that are most likely to improve passenger satisfaction.

There should be a requirement for the franchise operator to commit to high levels of transparency about all aspects of the franchise, including operational performance and service quality.

Passenger satisfaction

We have long-advocated more use of qualitative targets within a franchise. Our strong preference is for targets based on what passengers think, the best judge of quality being those who have used the services in question. The National Passenger Survey (NPS) is ideally suited to capture this information. NPS has a large sample size covering over 1100 East Coast passengers each wave. The sampling plan ensures that it is representative of day of travel, journey purpose (commuter, business and leisure), and, of course, of a range of demographic attributes (age, sex, ethnicity etc).

We believe targets should be established on each of the four East Coast service groups covered in the survey:

- London –East Midlands/East of England
- London – North East and Scotland
- London – Yorkshire
- Non London journeys

These should measure passenger satisfaction with the station, train service, train facilities and customer service attributes. Existing levels of satisfaction should be the *minimum* starting point for establishing targets which should generally become more stretching as the franchise progresses. Passengers would certainly not accept a situation whereby a new operator could introduce targets below that currently being achieved. An annual assessment of the combined spring and autumn results would provide a fair measure of the overall passenger satisfaction within each given year.

Key Performance Indicators

KPI assessments should be conducted across the entire franchise and include all stations and representative samples of the major train service groups. Standards of satisfaction with the customer services function, complaints handling and the level of appeals to Passenger Focus should also be measured. All assessments should be conducted regularly to provide ongoing management information as well as a basis for a periodic review based on collated information.

Performance targets

Given the very high significance of these factors to passengers, the specification must include traditional 'hard' performance targets covering punctuality, reliability and crowding, as well as more qualitative measures. However, we believe that there is a need for much more transparency surrounding these targets and how the company performs against them.

Transparency will promote greater accountability by making clear to rail passengers, staff, management, and other parties how key parts of the rail service are performing at different places and at different times. The provision of detailed information will enable rail passengers and others hold the train company to account and to ask what is being done to improve services in return for the fares paid. Good management should not feel threatened by this. Indeed the availability of accurate data may actually help them as a particularly bad journey can linger in the memory and distort passengers' perceptions. Accurate, relevant data can help challenge these negative perceptions and is also a vital management tool.

Punctuality data provided only at the overall TOC level can easily mask significant differences between routes and times of day. Providing disaggregated performance data, at minimum, at a route/service group level for morning/afternoon peaks, daytime and evening would help prevent this and focus attention on areas that need improving. Passenger Focus supports further steps to open up performance data (including cancellations) at station level to allow passengers to see information on the particular services that interest them.

Equally, there is currently next to no data in the public domain about crowding. This is another fundamental aspect of a passenger's journey and an area where greater transparency can also generate improvements for passengers.

Passenger Focus is currently working with the Office of Rail Regulation (ORR) and National Rail Enquiries, on behalf of all train companies, to explore passenger views on performance and other data and to understand how this may best be made available to them. The results of this qualitative research will be provided to the DfT and bidders at the earliest opportunity to inform the approach to data publication in the new franchise.

Question 11: What are consultees' priorities for improvements to the stations managed by the ICEC franchisee?

There has been significant station investment in East Coast stations. The 'new' Kings Cross is perhaps the most notable, but Peterborough is in the midst of substantial rebuilding and there are schemes at Wakefield Westgate and Newcastle that are starting or at an advanced stage of planning. In general terms we would like bidders to demonstrate how their future investment and station management plans will deliver:

- more seats for passengers waiting for trains
- cleaner and better-maintained station toilet facilities
- station staff that are more visible to passengers
- station staff with better knowledge during times of disruption.

In addition we would expect station presentation to feature in the suite of satisfaction measures referred to in the section above.

Passenger Focus's September 2009 research asked passengers to indicate their priorities for improving station facilities, with four areas from which to choose. Priorities were having more parking spaces (39 per cent), making it easier to pay (8 per cent), and improving cleaning and maintenance of the car park (2 per cent).

Significantly, 52 per cent did not regard any of these as their top priority for improving car parking: we suspect this is because we did not offer a "reduce the cost of parking" option. The daily car parking prices at East Coast stations are high (e.g. Peterborough £12.50, York £13.50, Darlington £10.50 and Newcastle £14.50). In some cases the car parking fee is nearly the same as some off-peak rail fares from the station concerned (e.g. Peterborough to Cambridge, £15.90). Passengers look at the total cost of travel rather than distinguishing between the component costs. We maintain that all-day and annual car parking prices ought to be subject to the same level of protection as regulated fares

Prior to the current recession, demand for car parking at a number of stations managed by the East Coast franchise was outstripping supply, despite the very high prices being charged by the previous GNER and later NXEC franchises. Outside the large urban areas, the car will play a key role in passengers accessing East Coast services and, as demand for travel increases (as all the forecasts suggest), it is likely that station car parks will quickly be at

capacity once again. It should also be noted that at many East Coast stations there are too few bicycle parking spaces.

Passenger Focus recommends that DfT requires bidders to develop, alongside their assumptions about volume growth during the franchise term, a Station Travel Plan for how passengers will get to and from each station. The key elements of each travel plan should become committed obligations in the franchise.

Question 12: What do consultees believe are the most important factors in improving security (actual or perceived)?

Passengers cite the lack of staff as a major reason for their feelings of concern over personal security. Passengers consistently identify staff presence as important to providing reassurance to those travelling on the railway. The industry therefore needs to give serious consideration to how it can best deploy staff. Our publication, *Passenger perceptions of personal security on the railways*, sets out passengers' concerns in more detail¹³. Bidders should set out how they intend to address these issues within the franchise.

The autumn 2011 NPS found, on average, just over one in ten passengers nationally had cause to be concerned about their personal security. The main causes for that concern, both on the train and at the station, were attributed to the anti-social behaviour of others and a lack of staff.

Question 13: Are there any increments or decrements to the DfT's proposed specification that stakeholders would wish to see and be prepared to fund?

Passenger Focus's remit does not extend to buying increments or decrements to the franchise. However, experience shows that those who lose services can encounter a number of difficulties unless there are well-planned and effective mitigations, including clear passenger information, put in place from the outset. This must be a requirement should any proposed decrements be given consideration.

¹³ *Passenger perceptions of personal security on the railway, Passenger Focus.*

5. Additional Passenger requirements not covered under the consultation questions

We provide further comment on a number of issues not covered under the specific consultation questions, but which we believe should be addressed in the new franchise.

Equality Act 2010

We note the requirements to comply with equalities and discrimination legislation and to produce a Disabled People's Protection Policy (DPPP). However, we would also highlight the fact that many mobility impaired people do not regard themselves as falling within the scope of disability legislation, so access improvements can benefit a much wider range of people including older or frailer passengers and those encumbered by luggage or small children.

Passenger Focus recommends that the franchise specification should include a requirement for the operator to audit the accessibility of stations and establish a minor works fund resourced, on an annual basis, at such a level that the operator can deliver a range of schemes, making appropriate adaptations to ensure that the accessibility of the franchise increases steadily over its duration. There should be a requirement for consultation with relevant groups including inviting suggestions about how this money might best be spent.

In addition to the provisions set out in DPPP guidance, Passenger Focus believes the franchise specification should also require the following provisions:

- Mobility-scooter policy to ensure that a suitable scooter acceptance scheme is in place for smaller, lighter and more manoeuvrable machines. The new franchisee must not offer worse terms than the current operator; existing passengers should not be prevented from travelling with their scooters merely as a result of franchise change.
- Clarify the hierarchy of use of priority seating and the categories of passenger considered eligible for it.
- Clearly indicate priority of usage in 'shared' spaces i.e. wheelchairs have absolute priority over buggies and pushchairs.
- Provide assistance cards which disabled passengers can show to staff to explain their disability; hearing-impaired, speech-impaired, learning difficulties etc. so that staff can react and provide the necessary additional assistance.
- Undertake comprehensive Passenger Assist monitoring: the number of bookings made, the number of bookings carried out and the passenger satisfaction. The results should be published in each revision of the franchisee's Disabled People's Protection Policy and the Passenger Charter.
- Best use should be made of the management information gained from Passenger Assist e.g. enabling TOCs to plan assistance provision better.
- Training of staff, especially front-line staff, in immediate customer contact, whether face-to-face or by telephone.
- That the new operator participates in the 'Railways for All' process including a quantified commitment to improve access to stations over the life of the franchise. This should

include an examination of all possibilities to improve station accessibility, e.g. induction loops, help points, adjustable-height counters and automatic doors.

- Ensure that passengers can always contact staff, either by telephone or via help points at stations, whenever trains are running, or by intercom or telephone aboard trains, to ensure that they cannot be stranded in the event of assistance failure, disruption etc.
- Ensure that special attention is given to maintaining fully-accessible websites, updated as necessary, given the increasing importance of this mode of obtaining information and tickets. At minimum the new operator should not fall below the standards achieved by the current operator.
- An annual action plan should be developed and implemented to enhance the service provided to disabled passengers using the combined franchise network and to improve customer satisfaction among those using the Passenger Assist system.
- All passengers with a Passenger Assist booking whose journey is or will be affected by amendments, cancellations or disruption to services, should be contacted as soon as possible to help them re-plan their journey, especially in the case of passengers whose journeys have already begun.

Management of engineering works

Passenger Focus recommends that improved management of service disruption, whether planned or unplanned, is incorporated into the objectives for the franchise. The specification should include the following requirements:

- To reduce the impact on passengers of Network Rail maintenance, renewal and upgrade of the railway and, in particular, to demonstrate efforts to minimise total blockades and the use of bus replacement where options exist to divert or operate single line working etc. The operator should be incentivised against accepting Schedule 4 compensation payments for lack of track access in preference to taking any available opportunity to retain some level of rail service.
- Provide dedicated staff at key sites to manage the impact of major engineering activity on passengers and ensuring the highest possible quality of information.
- Develop, monitor and regularly review procedures for managing both planned and unplanned disruption and assess the adequacy of plans and actual delivery on the ground with reference to the issues identified in Passenger Focus research into passenger experiences and needs during engineering works¹⁴.
- Ensure that the East Coast and West Coast mainlines between London and Scotland are not shut at the same time.

¹⁴ *Passenger Needs and Priorities for Planned Railway Engineering Works.*

Compensation policies

Passenger Focus recommends that the current 'delay-repay' compensation policy operated by East Coast and applicable to all passengers whose journeys have been disrupted should be retained in the new franchise. However, there is a need for the specification also to require meaningful measures to address the specific problems that can be experienced by season-ticket holders who may suffer regular delays of between 10-29 minutes that are not covered by the 30 minute threshold for 'delay-repay'.

A formal definition of sustained poor performance to cover these circumstances, and some firm proposals about how this will be reflected in additional compensation to regular travellers, should be required. The definition should take into account both the frequency of 10-29 minute delays and their cumulative total in any period.

The proposals for additional compensation should be subject to consultation.

Wi-Fi provision

Passenger Focus's September 2009 research revealed that passengers want Wi-Fi on East Coast Trains but routinely experienced difficulties with the download speed and connectivity of the current system.

One of the key advantages rail offers over other modes is in terms of the value of travel time. Being able to get some work done or simply catching up on emails / surfing the internet can be competitive advantages. Unfortunately these are lost if mobile communications (phone and Wi-Fi) are not reliable. A recent report from OFCOM on mobile 'not spots'¹⁵ referred to coverage on the West Coast Main Line being significantly better than the East Coast Main Line. Our NPS survey also asks about satisfaction with mobile phone and internet reception: for the autumn 2011 wave, satisfaction was at 65% and 50% respectively. It would appear therefore that there remain issues for bidders to address with the current East Coast wi-fi system.

Complaints handling

In our role as the statutory appeals body¹⁶ Passenger Focus has extensive experience of working with passengers and rail operators to seek resolution of appeal complaints.

We currently receive more complaints about East Coast than any other operator. As of the year ending March 2012 these constituted just under one-fifth of our total caseload, significantly higher than any other operator. Fuller details can be found in our Annual Report¹⁷

¹⁵ Rail 'Not-spots' - Technical Solutions & Practical Issues . OFCOM

¹⁶ For British rail passengers outside of London

¹⁷ Passenger Focus Annual Report and Accounts 2010-11

It is important that the specification for the franchise seeks detailed information from bidders about their policy and procedures for dealing with complaints. These should demonstrate a clear commitment to best practice and should encompass the following points:

Process issues:

- Empower customer services advisors to apply 'natural justice' when dealing with poor passenger experiences and allow redress to go beyond the minimum levels of the Passenger Charter or National Rail Conditions of Carriage.
- Establish mechanisms to monitor and manage response times and acknowledge complaints if they cannot be resolved within the target time, which should be published.
- Implement a process whereby appropriate issues are proactively investigated by the customer service advisor and other relevant staff members and the findings are fed back to the passenger.
- Establish mechanisms to feed complaints into service improvements, where possible, and feed information about this back to the passenger.

Response quality:

- Train and empower customer service advisers to identify and address all the points in the complaint and give heavy weighting to addressing all issues raised by the passenger in internal quality monitoring processes.
- Provide clear explanations about why the passenger is/is not receiving compensation and/or gesture of goodwill.
- Make careful use of appropriately-worded standard paragraphs, supplemented as necessary by bespoke responses.
- Ensure customer service advisors use clear, jargon-free English with correct punctuation when writing responses.

A clear process for handling legacy complaints should be established. Passenger Focus recommends that all complaints should be dealt with by the new operator from the first day onwards, with appropriate recompense mechanisms from the outgoing operator established to enable this.

Making the incumbent responsible for handling complaints reduces confusion and complexity for the passenger. It also ensures that complaints are handled by the operator with an ongoing interest in retaining their custom, and who is best placed to resolve any issues and implement any changes as a result of the complaint.

6. Acknowledgements

We would like to thank the Department for Transport for inviting Passenger Focus to attend and present our research at stakeholder consultation events.

We would also like to thank all the groups and individuals who submitted their consultation response comments and aspirations with us to help highlight regional passenger issues.

Appendix 1

Extract from Passenger Focus's response to the 2012 fares and ticketing review

In the area of fares, ticketing and value for money, Passenger Focus is seeking the following improvements on behalf of passengers:

Improvements to regulatory and legal arrangements

- That an individual regulated fare should not be allowed to increase by more than two percentage points above the nominal price cap (currently an individual fare can increase by five percentage points above the price cap, leading to a postcode lottery in regulated fare increases).
- That ticket vending machines (TVMs) and ticket retailing websites should be subject to formal 'impartial retailing' rules, as are ticket offices at stations.
- As a 'second best' to the previous point, that TVMs and ticket retailing websites should be obliged to say explicitly if they sell all tickets and on an impartial basis, or restrict their range.
- That all normally available tickets, whether issued as physical tickets or electronically, should be subject to the NR Code of Conduct, undiluted by more restrictive conditions applicable to the type of ticket held.
- As called for in Passenger Focus's May 2012 publication *Ticket to ride?*¹⁸ that passengers should not be guilty of a criminal offence relating to ticketing without the train company demonstrating deliberate intent to defraud.

Improvements to the pricing structure

- That, in order for passengers to effectively mix and match between Advance and 'walk up' ticket types, Off-Peak Single tickets for long-distance journeys should be half the price of the current Off-Peak Return (this would deal with the illogical situation in which a single ticket can be just £1 less than a return and provide a mid priced ticket that fills the gap between the complete inflexibility of Advance and the fully-flexible Anytime).
- That a comprehensive exercise should be carried out to identify where fares do not exist between pairs of stations; where they exist but are not valid for a perfectly reasonable routing; and where for no apparent reason Advance tickets do not exist for a journey between pairs of stations.

Improvements for commuters

- That passengers should be able to pay for an annual ticket by monthly direct debit at the same cost as a conventional annual season ticket.
- That ticketing arrangements should offer regular commuters, but who travel less than five days each week, a discount on the price of five full price day return tickets.

Giving passengers confidence that they are not paying more than they need to

¹⁸ *Ticket to ride?* Passenger Focus, May 2012

- That on any 'walk up' interavailable flow the through fare should not exceed the cost of buying 'walk up' interavailable fares for individual legs of the journey. One example of many where the unwary currently pay more than necessary is Aberystwyth to Leicester: the Anytime Single through fare is £55.50, yet an Anytime Single Aberystwyth to Birmingham ticket (£26.20) plus an Anytime Single Birmingham to Leicester ticket (£15.50) comes to £41.70. Addressing the problem by increasing the price of the individual legs of the journey would not be an acceptable solution.
- That TVMs should display only the tickets that it is appropriate to sell at the time, in order that passengers do not buy a more expensive ticket than they need (at present, many TVMs display tickets that are more expensive than needed at the time, leading to confusion and potential for the unwary to overpay).
- That TVMs and websites must charge the GroupSave price when a passenger seeks to buy three or four tickets for a journey where that product is offered. It is unacceptable that the unwary are charged for all passengers in their party when a 'three/four for the price of two' deal is available to anyone in the know.
- That to help passengers through the "two singles may or may not be cheaper than a return" jungle, ticket retailing websites should not sell a more expensive ticket than a passenger needs, without at least warning them first. Scenarios to cover include:
 - not selling an Advance ticket when a cheaper 'walk up' single ticket is valid on the same train
 - not selling out and back Advance tickets (in the same transaction) at a higher price than a 'walk up' return ticket valid on the same trains
 - not selling a 'walk up' ticket for a specific train or trains without first warning the purchaser when a cheaper ticket is available for the same train or trains.
- That ticket retailing websites should alert passengers making enquiries about journeys where Advance tickets are normally available, but on dates where reservations are not yet open, that the cheaper tickets have not yet gone on sale (at present, there is nothing to stop passengers buying a 'walk up' ticket in the mistaken belief that it is the cheapest price unaware that cheaper, potentially very significantly cheaper, tickets will go on sale at a later date).
- That towards the end of peak periods, booking offices, TVMs and websites should warn passengers making long distance journeys that it may be cheaper to buy an Anytime ticket for part of the journey and an Off-Peak ticket for the remainder (for example, an Anytime Single from Kettering to Exeter for the 08:56 departure costs £175; however, by the time the passenger departs from Paddington at 11:06, Super Off-Peak tickets are valid a Kettering to London Anytime Single at £60 including Underground from St. Pancras to Paddington and a London to Exeter Super Off-Peak Single at £43 would save £72).
- That sufficient information (e.g. restriction times, geographic boundaries etc.) should be contained in the fares system about all Day Ranger tickets to enable websites to sell them

to passengers making relevant journey enquiries. At present, many websites are 'blind' to Day Rangers, even when they are the most appropriate ticket for the journey in question and passengers are instead offered a higher priced ticket. Resolving this problem would, we understand, also allow Day Rangers to show on TVMs where relevant.

Acting in a fair and reasonable way towards passengers

- That if a passenger misses the train on which they booked an Advance ticket, the sum paid already should count towards the new ticket they need to buy (less a reasonable administration fee).
- That passengers who have a ticket for the date in question between relevant stations, but are asked to buy a new one or pay an excess because it is not valid for the train they are on, should be sold/upgraded to the cheapest 'walk up' ticket valid on that train. In these circumstances passengers should not be forced to buy a full price Anytime ticket on a train where Off-Peak fares are valid. This is already the policy of Virgin Trains, Southern, ScotRail and Hull Trains and should become universal.
- That if a passenger cannot produce a ticket for the train they are on, but can prove at the time or later that they have bought an Advance ticket for that train they should not be asked to pay again, or should receive a refund of any additional fare paid.
- That passengers who hold a railcard-discounted ticket but who have forgotten their railcard should have the option to present it within a fixed period without financial penalty with further action taken only if they fail to do so. A limit to the number of 'grace' occasions within a 12 month period may be reasonable; names and addresses should always be taken discretely in these circumstances. The industry should also consider how technology can help in future with on -the -spot verification that the individual concerned holds a valid Railcard.
- That passengers who have bought a train company specific 'walk-up' ticket, but travel on another company's train, should be asked to pay the difference between what they have paid already and the interavailable price and not treated as if they had bought no ticket at all.
- Also called for in *Ticket to ride?*¹⁹, that a code of practice should be introduced to provide safeguards for passengers, including appeal arrangements, around use of Unpaid Fare Notices by train companies.
- That passengers wishing to change previously purchased advance tickets for a different date or time should pay one £10 administration fee to cover all the tickets in the transaction (at present, a family of four needing to change out and back return tickets would face £80 in administration fees, which feels utterly disproportionate to the train company's costs and makes many Advance tickets de facto "no refund, no change").

¹⁹ *Ticket to Ride? Passenger Focus. May 2012*

- It should be permitted to change the origin or destination of an Advance ticket prior to departure (on payment of a reasonable administration fee). At present, there is no facility to change an Advance ticket from, say, London-York to London-Leeds, adding to the inflexibility of this ticket type. Venues change as well as dates and times.
- That TVMs should be programmed to allow Off-peak fares to be sold early enough for passengers to buy one and board the first off-peak train. As soon as the last more expensive train has departed, the cheaper ticket should be available (passengers have problems with TVMs displaying Off-peak tickets only from the moment they are valid, in some instances allowing no time to buy one and board the first train on which that ticket can be used).
- That Automatic Ticket Gates should be programmed to allow holders of Off-peak tickets to access platforms in sufficient time to board the first off-peak train (in some instances passengers find that an Off-peak ticket will not open the gates in time to get on the first train on which it is valid).

Transparency, clarity and reassurance

- That validity restrictions should be printed on 'walk up' tickets, whichever purchasing channel is used.
- That booking offices, TVMs and websites should be able to show passengers the permitted routes" applicable to any 'walk up' or season ticket.
- That season tickets should be sold with a "permitted routes" map.
- That to guard against passenger perception that no or very few tickets are available at the advertised headline price (e.g. A to B one way from £8), train companies should be transparent about how many tickets they have sold at the lowest Advance price for their key passenger flows.

Ticket vending machines and ticket retailing websites

- That validity restrictions, for both outward and return legs if applicable, should be clear to passengers before they commit to purchase the ticket.
- That TVMs and websites should recognise London stations with or without the prefix "London" (e.g. Paddington and London Paddington), with arrangements to prevent confusion around similarly named stations elsewhere in the country (e.g. Waterloo on Merseyside and Charing Cross in Glasgow).
- That TVMs and websites should display "(5-15 years)" wherever child fares are referred to.
- That TVMs and websites should give a clear explanation of the London Travelcard Zones to which they are selling tickets.
- That sufficient information (e.g. restriction times, geographic boundaries etc.) should be contained in the fares system about all non-national Railcards to enable websites to sell discounted tickets to passengers making relevant journey enquiries. At present, some websites are unaware that particular Railcards exist, making it impossible for passengers holding them to buy online. Resolving this problem would, we understand, also allow TVMs to offer discounts relevant to those Railcards.

- That TVMs should be able to sell tickets with an origin station other than that at which they are located. A passenger wishing to buy out and back single tickets because it is cheaper than a return cannot currently do so using a TVM at the start of their outward journey. Boundary Zone 'add on' tickets also need to be available from TVMs. The 'remote purchase' option exists at ticket offices and TVMs should replicate this functionality to ensure passengers are not disadvantaged at times when the booking office is closed.

Access to Advance tickets

- That the cut-off time for Advance tickets should be two hours before departure, unless there is a genuine practical reason to make it longer.

Ticket office opening and queuing times

- That for each station, train operators should report regularly on their success at achieving published opening hours and at ensuring passengers do not wait more than three minutes (off-peak) or five minutes (peak). Passenger Focus research suggests that ticket office queuing times need to be monitored and managed more proactively by train companies²⁰.

Ticket sales during service disruption

- That ticket sales should be prevented on trains that have been cancelled, but should be possible on replacement trains or buses. There is partial progress in this direction, but more needs to be done.

²⁰ *Still waiting for a ticket? Ticket queuing times at large regional rail stations*, Passenger Focus,

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