



Formal response to Southeastern's
consultation on major changes to ticket
office opening hours

March 2007

Passenger Focus formal response to Southeastern's consultation on major changes to ticket office opening hours

Background

1. On 15 January 2007 Southeastern formally submitted a scheme proposing major changes to various ticket office opening hours under clause 6.18 of the Ticketing and Settlement Agreement (TSA).
2. As required Southeastern confirmed that public notices were placed at the stations where major changes are proposed to the current ticket office opening hours. The purpose was to facilitate a public consultation to which both London Travel Watch and Passenger Focus are entitled to respond.
3. Southeastern also notified us separately on proposals for minor changes to ticket office opening hours.
4. This is the formal response to the consultation on the major changes to ticket office opening hours on behalf of the responses from the public to Southeastern's proposals as well as to the minor changes proposed.

Introduction

RPC [Passenger Focus predecessor organisation], London TravelWatch and the significant number of passengers, who responded to the previous consultation by South Eastern Trains in 2005, were strongly opposed to the scale of the major changes proposed. These changes would have resulted in considerable reductions to the ticket office hours and staffing levels and before the full implementation of the investment into new Ticket Vending Machines [TVMs].

Passenger Focus and London TravelWatch campaigned jointly in objecting to South Eastern Trains' proposals. Our campaign was successful as we persuaded the Secretary of State to defer a decision to enable these latest proposals to be submitted by Southeastern.

Passengers continue to express the desire for more staffed presence on the railways so any thing that leads to a reduction is unwelcome. However we also understand the wider context in which technology is bringing innovation to retail activities within the rail industry such as self service machines and smartcard technology.

It is clear that Southeastern has taken Passenger Focus and London TravelWatch as well as passenger concerns into account by moderating the amount of ticket office hours and staff

numbers that would have been lost under South Eastern Trains proposals. Passenger Focus welcomes these improvements.

Our formal response

This response has taken the following factors into account:

- The interests of passengers, the public and stakeholders who have responded to the proposals;
- The development and implications of the changes proposed;
- The provisions of Schedule 17 and;
- Comparison to the proposals originally submitted by South Eastern Trains.
- The minor changes to the ticket office opening hours are dealt with separately in this formal response.

Passenger Focus also responded to Southeastern’s pre-consultation by a letter dated 23 November 2006.

The interests of passengers, the public and stakeholders who have responded to the proposals

We received 174 letters, which included 141 postcards objecting to the proposals. Objections were also received from stakeholders such as Paul Clark MP, The Leader of Gravesham Council John Burden, Mick Sutch of Kent County Council and the General Secretary of the RMT, Bob Crow. The majority of responses were general objections submitted by postcards and not necessarily specific to particular stations or issues. The number of responses was considerably less than the nearly 3000 objections received opposing South Eastern Trains although the issues raised are broadly the same. A log of the consultation responses is attached.

The context in which passengers oppose changes to ticket office hours reflects the expectations measured by National Passenger Survey results for ‘Station facilities’ as follows:

NPS Factor	Autumn 2005	Spring 2006	Autumn 2006
Ease of buying a ticket	58	56	59
Provision of information about	76	73	77

train times/platforms			
The attitude and helpfulness of the staff	67	64	66
Personal security whilst using Station facilities	55	50	53
The availability of staff	55	52	51
How request to station staff was handled	86	76	84

Whilst *the ease of buying a ticket and the provision of information about train times* has shown some improvement since Southeastern took over, the other related factors have shown a decline. We therefore have a general concern that these proposals are unlikely to lead to an improvement in Southeastern's passengers' satisfaction ratings, particularly with regards the *availability of staff*.

The main issues from passengers' objections in response to this consultation include:

- A perceived reduction in customer services – in the provision of advice, information and availability of staff.
- Safety concerns - the expectation that a reduced staff presence will result in increased vandalism and less supervision of youngsters and anti-social behaviour;
- Ticket Vending Machines – were not considered a suitable alternative to real staff as they could not give passengers advice for instance about disruption, the best value fares or journey options. Some concern was also expressed about the reliability of the Ticket Vending Machines and the fact that they could not retail the complete range of tickets.

The grounds upon which Passenger Focus can object to the major changes are governed by the provisions of Schedule 17 of the Ticketing and Settlement Agreement and these are discussed in the relevant section below. Passenger Focus is duty bound to bring these concerns to Southeastern's attention. We however submit that the onus lies on Southeastern to continue its

efforts to address these general concerns in order to improve the overall levels of customer satisfaction.

The development and implications of the changes proposed

Passenger Focus and London TravelWatch were notified in September 2006 of Southeastern's fresh proposals to replace the previous major changes originally submitted by South Eastern Trains. Southeastern explained that the proposed changes to ticket office hours were based around their obligation to meet the Passenger Charter targets within which passenger should be able to purchase tickets. Southeastern provided data to demonstrate the times passengers spent queuing at the various stations to buy a ticket either from the ticket office or ticket vending machine.

We welcome Southeastern's focus on meeting passenger charter queuing targets as this should lead to further improvements in passengers satisfaction with the 'ease of buying a ticket' as noted in the National Passenger Survey results above.

Passenger Focus is pleased that Southeastern has taken into account the broad issues raised in our objections to Southeastern as well as our interim views dated 23 November 2006 and also moderating the reduction in overall ticket office opening hours compared to Southeastern's original proposals.

Ticket office hours

Closures - Southeastern proposals would have resulted in the complete closure of the ticket offices at Martin Mill and on Monday – Friday at Knockholt and Stone Crossing. Closures were also proposed all day for Saturday or Sunday at Hildenborough, Longfield, Newington, Otford, Sandling, Sandwich, Walmer, Westgate on Sea and Wye.

The only closures proposed by Southeastern are at Longfield on Sundays and Martin Mill on both Saturdays and Sundays. No other station is left without staff cover.

Reduced ticket office hours – The main concern for passengers is how to ensure that when the ticket office opens they are able to purchase tickets first thing in the morning before the first train departs.

The following are our suggestion of where with only minor adjustment the current proposal will better match the train times:

Station	Day(s)	Suggested Opening time	Suggested Closing time
Ashford	M-F	0500	21.30
	Saturday	0500	21.30
	Sunday	0600	21.30
Dover Priory	M-F	0430	2000
	Saturday	0600	1930
Farningham Road	M-F	0610	1200
Meopham	M-F	0600	12.45

Ticket Vending Machines (TVMs)

Southeastern had plans to provide TVMs at Ashford, Hastings, Longfield, Meopham, Newington, Rainham Kent, Staplehurst, Swanley and Walmer. SERs proposals will see 7 additional TVMs - two at Ashford and one each at Hildenborough, Otford, Sandwich, Walmer and Westgate on Sea. We welcome the fact that these machines accept cash and credit cards. Until smart card technology becomes universal, it is imperative that passengers are not denied the opportunity to pay by cash.

We would expect the TVMs at Ashford, Hildenborough Otford and Westgate on Sea to be installed before the 4th of April which is the date when SER are proposing to effect the changes.

It is disappointing that there are no immediate proposals for TVMs at the following stations. Namely – Farningham Road, Martin Mill, Queenborough, Sandling, Sole Street, Swanscombe and Wye. We however note that SER have agreed to review this if demand increases.

Permit to Travel Machines - SER intention was to remove all the 130 Pertis machines and to replace them with Pertis+. We have since been informed that SER are unable to secure a market supplier for Pertis+. This is disappointing as the Pertis machines are not user friendly and provide

only the most basic retail function. However in the absence of the Pertis +, we would expect Pertis machines to be retained at all stations were Pertis+ was to be installed, including at the following unstaffed stations namely:

- Aylesford, Bat & Ball, Beltring, Cuxton, Dunton Green, East Farleigh, Edenbridge, Godstone, Halling, Kemsing, Kemsley, Leigh [Kent], Maidstone Barracks, New Hythe, Nutfield, Penshurst, Snodland, Swale, Wateringbury and Yalding

In the absence of the improved Pertis + we would expect SER to confirm whether they will extend the plan to the retained Pertis machines, to change the amount of cash required to the level of the minimum fare equivalent from that station. Passenger Focus would be reluctant to support this because of the increased likelihood that a passenger with insufficient change would face the risk of a penalty fare charge.

We welcome the additional Star machines at Ashford and Staplehurst. We also welcome the replacement of the obsolete Quickfare machines with TVMs at Sandwich, Walmer and Westgate on Sea in addition to the new TVMs to be installed at Ashford, Hastings and Otford.

The overall reliability of your ticket machines is itself a concern to passengers. Some of the current concerns that we are aware of include - change not given or credit cards retained, machines out of service or vandalised; and the limit on the full range of tickets. Passengers' confidence in your ticket machines is likely to be undermined even further by what appears to be an extreme reluctance to recompense passenger loss when they write in to complain - despite these being reoccurring and well known problems. We would expect you to adopt a far more sympathetic and customer friendly approach in resolving complaints about your ticket vending machines.

Your proposals rely on a shift in passengers' ticket purchasing habits from ticket offices to self service machines. We would therefore expect that you will devote sufficient resources to publicising this and providing ongoing help for passengers who are currently unfamiliar with or reluctant to use the machines.

Finally we expect that all new machines are installed and working and any issues preventing access to TVMs to be resolved before the changes to current ticket office hours or staff reductions take effect. We would also expect that all passenger operated ticket

machines are covered by CCTV to prevent fraud and to ensure the personal security of passengers.

Finally we welcome the replacement of all Quickfare machines.

Accessibility to the TVMs is essential especial where it is located within the ticket office which might well be inaccessible to passengers when it is closed.

Staff reduction

On staffing Southeastern proposes to reduce the overall number of booking office staff by 17.5 full-time equivalent (FTE) posts across the whole of its network, compared with the previous proposal to lose over 100 such posts. This 17.5 overall reduction is achieved by deleting 24 FTE posts and adding 6.5 FTE posts at other locations. In the Kent area only 8.5 FTE posts are deleted but 1 additional post is created. No station is left without any staff cover as no station closures are proposed.

We note that Southeastern's commitment to Rail Enforcement Officers was dependant on approval to remove a 100 station ticket office staff. We are therefore pleased that Southeastern has continued to develop and increase the number of Rail Enforcement Officers. Passenger Focus has accompanied REO's on duty and can testify to the invaluable role they play in combating anti-social behaviour, fare evasion and helping to improve passengers' general perception of security. Therefore we would welcome any further commitment to increase the numbers of REOs.

The Ticketing and Settlement [Schedule 17] issues

Southeastern believes that the its proposals meet the definition of the major change as referred to in 6.18 (1) (a) (i) of the TSA " as the proposals would improve the current arrangements in terms of cost effectiveness, while still ensuring members of the public continue to enjoy widespread and easy access to the purchase of rail products.

1. *Current levels of accessibility to facilities for the sale of fares* – We note that Queenborough, Farningham Road, Martin Mill, Sandwich, Sole Street, Swanscombe and Wye will have no facilities to purchase tickets when the ticket office is closed. We would therefore not expect Pertis to be removed unless it is replaced with an alternative self

service ticket machine. In the case of Queenborough we would expect at least a Pertis machine to be installed

2. *Need to safeguard the interests of passengers and other operators* –The Penalty Fare regime while aimed at preventing ticketless travel is often used as a blunt instrument which can unfairly penalise passengers who have genuinely embarked upon their journey from a station with insufficient or no ticket facilities. For passengers using Farningham Road, Sole Street and Swanscombe where only a Pertis is provided, there is the added risk of a penalty fare. We have noted from passenger complaints that SER would expect passengers to seek out the conductor to purchase a ticket. Whilst we support SERs desire to reduce ticketless travel, we do not think that passengers from stations with no facilities to purchase a ticket should face the risk of a penalty fare.
 - Therefore we would strongly suggest the options for SER are to either provide adequate ticket facilities or allow passengers the right to purchase a ticket without condition from a conductor or revenue inspector or alternatively to remove these stations from the Penalty fare zone especially in view of the limited number of transactions at these stations.
1. *Promotion of the use of the network* – Ticket Vending Machines were available are an effective way of making tickets available to passengers. This together with on-line ticket sales can were promoted add to the convenience and ease with which passengers can purchase tickets. They are however not seen as a substitute to real face to face retail transactions
2. *Costs of providing existing facilities, the level of demand for those facilities* – At least a Pertis should be provided at Queenborough as it is an anomaly being the only station without either a TVM or Pertis. Generally though we note that Southeastern have reflected the concerns expressed in our objections to South Eastern Trains. For instance they have based the changes on evidence of the demand at stations over a period of time
3. *The adequacy of proposed alternatives in relation to the needs of passengers who are disabled* – We note that the new TVM machines will be DDA compliant and allow the use of the disabled person's railcard
4. *The continued provision of clear standards of service that can easily be understood and monitored* – We would expect Southeastern to continue to adhere to its passenger charter commitments especially with regards queuing times. We would also expect that a much higher level of compliance with Schedule 17 than is currently achieved
5. *The need to provide passengers with reasonable certainty about the new arrangements and avoid frequent changes* - As this is the second set of changes to the ticket offices

hours we would not expect further changes unless they are increases for the benefit of passengers.

Minor changes – Passenger Focus notes the minor changes proposed. This falls into three categories – [1] where the overall reduction in opening hours across the whole week is 25 minutes or less. [2] where the overall reduction is more than 25 minutes across the week and [3] where there is an overall increase in ticket office opening hours.

Conclusions and recommendations

We have reviewed Southeastern's major and minor proposals in the light of South Eastern Trains' previously submitted proposals, the considerable reduction in the number of passenger objections, the requirements of Schedule 17 and the approach adopted by Southeastern to focus on achieving passenger charter targets for queuing times.

We would have no objection to the proposals subject to the following comments and recommendations:

1. We understand the new proposal is based on meeting your Passenger Charter queuing times by ensuring there are sufficient retail outlets at the times most passengers want to buy their tickets from a choice of staff and ticket windows or ticket vending machines. We endorse this approach as the direct link with your queuing time obligation should also be measurable. We would expect you to monitor this and update Passenger Focus on a regular basis
2. We would recommend that you to develop Action Plans to improve the factors affected by these changes in your National Passenger Survey results
3. We recommend that Southeastern considers making minor changes to the proposed opening times at Ashford, Dover Priory, Farningham and Meopham as suggested above to offer a closer match to the early trains' departure times
4. We recommend that you develop actions to address the general concerns expressed in complaints and known issues such as vandalism and fraud affecting your TVMs
5. We would expect the TVMs at Ashford, Hildenborough Otford and Westgate on Sea to be installed before the 4th of April which is the date when Southeastern proposes to effect the changes
6. In the absence of the Pertis +, we would expect Pertis machines to be retained at all stations were Pertis+ was to be installed, including at the all unstaffed stations

7. We would not expect Pertis to be removed unless it is replaced with an alternative self service ticket machine. In the case of Queenborough we would expect at least a Pertis machine to be installed
8. In the absence of the improved Pertis + we would expect Southeastern to confirm whether they will retain some of the Pertis machines and change the amount of cash required to the level of the minimum fare equivalent from that station as proposed for Pertis+
9. We would recommend that in resolving complaints about your ticket vending machines that you should adopt a far more sympathetic and customer friendly approach to build passenger confidence in the reliability and customer services that you offer
10. We would recommend that all passenger operated ticket machines are covered by CCTV to prevent fraud and to ensure the personal security of passengers
11. Whilst we support Southeastern's desire to reduce ticketless travel, we do not think that passengers from stations with no facilities to purchase a ticket should face the risk of a penalty fare. We would welcome the opportunity to look into the options for Southeastern to either provide adequate ticket facilities or allow passengers the right to purchase a ticket without condition from a conductor or revenue inspector or alternatively to remove these stations from the Penalty fare zone especially in view of the limited number of transactions at these stations
12. We would also expect that a much higher level of compliance with Schedule 17 than is currently achieved.

Finally we thank you for undertaking this consultation and look forward to your response.

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