

Jocelyn Pearson
Passenger Link Manager
Passenger Focus
1 Drummond Gate
London
SW1V 2QY

Richard Brooks
Head of Station Staffing Projects
London Midland
102 New Street
Birmingham
B2 4HQ

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Dear Jocelyn

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

Thank you for your letter dated 1 April detailing your response to our proposals for changing ticket office opening hours at 86 of our stations.

Firstly, I would like to thank you for recognising our positive approach to ensuring that the consultation was widely publicised and we do appreciate the healthy response from both our passengers and other stakeholders.

Your response raises a number of issues that I will deal with positively and I want to demonstrate to all those who took the time to contribute to the consultation that their concerns have been taken seriously.

I have placed the issues raised by the consultation under four key headings.

Data

The initial concern in your response was about the data collection period and the possibility of some stations not being staffed during their advertised opening hours. Please note that for the original data supplied, we took account of where ticket offices were not open during the data collection period and provided data from comparable days to ensure its validity. Therefore, the data provides a robust picture of ticket office usage at the stations affected. Since our initial submission we have also provided you with more recent data (November-December 2010) as a direct year on year comparison to one of the original collection periods in our proposal, all of which has provided additional evidence as to the validity of the data and the trends in sales at ticket offices across the network.

Your response highlighted Hall Green station as an example of where you believe we should review the proposed ticket office opening hours based on the data. The data for Hall Green for Sunday sales shows that the benchmark of 12 ticket transactions is exceeded in only one hour during the day. Therefore, we did not consider it cost effective to have the station open for one hour and will continue to endorse our proposal for not opening the station ticket office on Sundays.

Ticket Vending Machines (TVMs)

We are pleased that you welcome our proposal to provide an additional 29 TVMs across our network. We are well aware of your national research report 'Ticket Vending Machine Usability' and have already utilised it to make a change to our existing TVMs. This has involved changing the child button on our TVM to show the age range required for buying a child ticket. We are now looking closely at other recommendations made in the report. Your response also raises the limitations with regards to TVMs as a retail option and you have detailed the specific issues raised by passengers concerning these. We have provided a response to each of these issues below:

- Your response raised the issue of the TVMs' failure to provide a full range of products. Our response is that we will be working with our TVM suppliers to provide the widest range of tickets possible on our current and new TVMs. On the current TVMs we are working with our suppliers to put One-Day nNetwork cards and nDaytripper tickets onto these machines. We are also progressing with our suppliers the provision of a link to the TVMs that will carry information on season ticket holders so that they can access concessionary fares such as Friends and Family tickets. With our new TVMs we are in a good position to specify a number of new features to increase the current range of tickets available.
- In your response you state that our proposal to install card only TVMs will cause problems for those people without credit cards and especially those wanting to pay low value fares by cash. In response we are aware that not everyone has a credit or debit card and that some low value fares are paid for by cash. However, official figures estimate that 85% of the UK population now has one or more credit/debit cards. For those not able to make a card payment at a time when the ticket office is closed, there is the alternative of the permit to travel machine at most stations and these will take cash. If one of these is not available then the first opportunity to pay will be on the train. Thus the passenger is not penalised for being without a credit/debit card. This is already the case at a number of unstaffed locations that we manage. Card only machines also have less mechanical parts to go wrong, which results in them being more reliable for passengers. Our analysis shows that in terms of our current machines, 70% of reported problems relating to the payment system are connected with the coin and note mechanisms. The card only TVMs also provide less attraction for criminals as they contain no cash.

- Your response raises the issue of the station TVM being available at an inconvenient location on the station, especially for passengers with mobility issues. Our response to this is that we have already identified a number of TVMs that will need to be relocated should the proposal be agreed to make them more accessible when the ticket office is not available. These are at Marston Green, Worcester Shrub Hill, Cradley Heath, Selly Oak and Four Oaks stations. We will be happy to review further locations that you feel would benefit from such measures.
- Your response raises the concern that some passengers face problems using TVMs due to dexterity, language issues and sunlight on screens. In response we realise that some people may have difficulty using TVMs and this provides a challenge for all train operating companies with this equipment. We are committed to working with a range of organisations and TVM suppliers to achieve improvements to both our current and future TVMs. In relation to both current and new TVMs we will have the ability to change the profile of screen layouts and improve their usability by location. However, it is important to note that the majority of stations will remain staffed at the busiest times of the day to meet the needs of all passengers, including those that require assistance.
- In your response you note passengers are concerned about the risk of receiving a penalty fare should a TVM malfunction. Our response is that TVMs are monitored closely for faults or vandalism. All of our TVMs are part of a controlled alert system that provides timely information on faults and we will be enhancing this process through our centralised control office. We will be reviewing our penalty fares policy in light of any agreed changes, but we do not believe that these will undermine our current penalty fares policy and operations. For passengers it will remain our policy that any penalty fare is based on the ability to buy a ticket and where this is not possible they will not receive a penalty fare. Permit to travel machines will remain in place at many stations and we are working with TVM suppliers to enhance the provision of this facility as we move forward.
- We appreciate that passengers are concerned about our proposals leading to increased ticketless travel and the subsequent loss of revenue. We acknowledge that there is a risk and we will manage it by the robust delivery of our gatelines, with focused deployment of our on- train revenue protection team plus continuing improvement of conductor ticket checks on trains. We will continue to undertake our quarterly ticketless travel surveys that enable us to focus our attention on areas where revenue is most likely to be at risk.

Accessibility

Your response raises the issue of accessibility when stations are unstaffed. In response we recognise our staff provide assistance when available at stations and this will continue, wherever possible. For those passengers requiring assistance that turn up without booking we will continue to make every reasonable endeavour to meet their travel needs. This will involve the assistance of our on-train team as is currently the case at many unstaffed stations that we manage. As stated in our initial submission we will be investing in additional platform to train ramps so that these are easily accessible for both on train and station teams. For disabled passengers who use the advance booking system 'Assisted Passenger Reservation System (APRS)' we appreciate that this is not a perfect system. We are working to deliver improvements to the APRS journeys that we manage for disabled passengers. Specifically we will undertake a review of our APRS records and make contact with regular passengers who book assistance so that we can discuss future arrangements with them.

We also have active National Station Improvement Programme and Access for All schemes in progress at a number of our stations that will deliver real benefits to our passengers, especially those who may be mobility impaired.

In your response you state that passengers seek assurances that lifts will remain operational if staff are not available. We are pleased to provide reassurance that we will keep lifts in operation when a ticket office is closed. This will be an improved passenger facility in comparison with the current situation, which requires the lifts to be locked out of use once the station becomes unstaffed.

Safety, security and the station environment

Your response outlined the issue of safety and security for passengers and their concerns of being at an isolated unstaffed station in winter. In response, safety is our top priority and we manage the risks that we face as far as is reasonably practicable. We are aware that a human presence does provide some sense of security, but we currently manage unstaffed stations and deal well with the issue of safety and security. In relation to our proposals we are considering additional security measures at stations. We are working closely with the BTP on joint safety and security risk assessments with detailed discussions taking place at our joint tasking meetings.

We are undertaking a review of our CCTV provision, analysing its quality, coverage, access and retrieval. As mentioned in our proposal, we are also delivering help points at all of our stations. We are aware that this system on its own cannot phone the police or call an ambulance. However, it is a tried and tested system across the country and is seen as a crucial piece of equipment for providing a sense of security for passengers. We will ensure that good signage is provided to our passengers to make them aware of this facility and how to use it.

In addition, we are identifying those stations considered possible hotspots for crime and anti-social behaviour and ensuring that they will be targeted for additional security measures. Since the start of our franchise we have invested in achieving secure station accreditation for stations that cover 80% of passenger journeys on the network. There is an ongoing programme of re-accreditation for all of these stations and we will continue to work to provide secure station accreditation for more locations. A measure of our success in managing safety and security is demonstrated by our latest crime statistics that show an overall 40% decrease across the network (year on year).

Your response also stated that unstaffed stations were prone to not being kept clean and looking cared for by the company. In response staff will continue to undertake cleaning at their own stations as they do now. At those stations where we propose to close the ticket office completely, we will put in place arrangements for the station to be regularly visited for cleaning. For example, should our submission be agreed our proposed staffing arrangements will see extended periods of time when more than one person is available at a number of stations, which will allow them to visit other locations.

To ensure that we remain vigilant at maintaining our station environments we will continue to drive improvement through our rigorous Service Quality Management System that measures performance in a wide range of customer service delivery areas. We will also continue to measure the perception of station service delivery through our quarterly customer satisfaction surveys that supplement the National Passenger Survey process that you undertake. The focus on both of these processes has delivered improvements since the start of our franchise and will continue to do so.

Concern about the management of large numbers of school children is also raised in your response. On this issue we will undertake risk assessments at all identified locations where we provide a service to large groups of children.

Your response raises the issue of waiting shelters, toilets and payphones not being available when staff are not on the station. Our response to this is that we have undertaken a review of the possible non-availability of toilets and waiting rooms for passengers as a result of the proposals. We do have a policy of locking station toilets and waiting rooms when staff are not available on stations and this will continue. From our experience this provides a clear deterrent to vandalism and other anti-social behaviour. It is important to note that the toilets and waiting facilities at staffed stations will still be available at the busiest times of the day, when we will have ticket offices open. With regards to shelters we have looked at the facilities being provided and the need to ensure that there are alternatives for passengers. At stations such as Cradley Heath, Lye and Old Hill we have already identified the need for additional shelter facilities. In addition, we will undertake a review of pay phone locations and will try to ensure that they remain available when a station is scheduled to be open.

You raise in your response the issue that unstaffed stations may impact on local businesses due to their unwelcoming appearance. Firstly, the stations that we are proposing to be unstaffed are by their nature lightly used and so use of rail services to access the local business is likely to be minimal. In the case of Jewellery Quarter, the majority of passengers using the station do so as a destination location, so in most instances they will already have bought a ticket and sought information. At such stations we believe that the provision of effective physical wayfinding and onward journey information is a significant value added for passengers. Also, in relation to this we are currently developing proposals in line with the national information zoning initiative for many of our stations.

Dealing with disruption when staff are not available at stations was also raised as a passenger concern. In response we wish to make it clear that accurate passenger information during disruption is of paramount importance. We have already invested millions of pounds in new and enhanced customer information systems at our stations and continue to do so. This includes the provision of new audio and visual systems in terms of both hardware and software including the ability to record announcements at our central control office, which can then be set to broadcast at any station. In addition, our station help points are now linked to operators who can provide personal assistance, which includes real time train running information, advance journey planning, fares and ticket options, assisted travel arrangements as well as providing a link to our customer service team to discuss any issues including lost property enquiries.

Conclusion

I hope that our response has provided you with the details of the hard work and thorough consideration we undertook in producing our proposals. We want to ensure that the proposed changes do not impact negatively on the valuable service we provide and that our passengers do continue to travel from clean and welcoming stations with an ability to buy tickets with ease and obtain help when it is needed.

We look forward to further discussions with you on the key issues raised by passengers during the consultation process and through other research that you have undertaken.

Yours sincerely



Richard Brooks
Head of Station Staffing Projects