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(Sent via e-mail)

Dear Robert,

## **Ticket offices: emerging issues and clarification questions**

Thank you for your letter of 6 September detailing your queries on the proposed changes relating to ticket retailing as outlined in our Major Change Template spreadsheet. We are grateful for the time that Transport Focus have dedicated to processing, analysing, and summarising the large volume of responses that you have received since the public consultation commenced on 5 July 2023.

I would also like to take the opportunity to acknowledge that we are grateful for the opportunities that have allowed us to meet both face to face at Glasgow Central and via Teams to discuss the proposals with you in more detail throughout the consultation period and, we believe, address any areas of clarification.

The Avanti West Coast (AWC) objective is to create an enhanced and more accessible customer service, with a passenger experience in line with expectations from using other modern retailing platforms. As set out within the 5 July 2023 consultation, the proposal is to physically close ticket offices but to continue to provide specialist ticketing staff support to passengers. The times of day for our specialist ticketing staff have been chosen to align recent ticket sales data and therefore to reflect the volumes of customer transactions.

AWC staff will no longer be behind the glass - instead they will be located by the main ticket vending machine(s) at each station. This enables us to support the current 6% of customers who purchase over the counter at ticket offices today where AWC is the lead retailer, and also support the remaining 94% of customers who pass through our stations.

The team will continue to be highly trained in the full range of ticket types. They will be able to support with web and app purchase, the use of TVMs and aftersales, as well as to

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proactively support customers with information and other queries. In the event a ticket is unavailable on a digital sales channel or TVM, staff will be able to use handheld ticket issuing devices to retail the full range of ticket types available to customers today, with the full range of payment types accepted.

Our responses to each of your questions are below, in the order in which you asked them and grouped by the main headings in your criteria.

## 1. Issues relating to whether passengers can easily buy the right ticket for the journey they want to make.

### Adequacy of retail facilities

#### ***1.1.1. What assumptions have you made about how many / what proportion of people will move to digital if ticket offices are closed?***

1.1.2. The proposal to change the way in which tickets are retailed at AWC is in response to a movement to digital from traditional station sales. This has been gradually decreasing during the previous decade with the proportion of journeys bought at the stations reducing by two thirds during this time. The trend of moving to digital is expected to continue as web functionality and ease of use continues.

1.1.3. AWC have made a very conservative assumption that only 10% of the customers who currently use the ticket office at AWC stations will move to digital methods of purchase (web and app). However, working with industry partners we intend to promote and support greater continued transition to digital.

1.1.4. Evidence from previous Ticket Office closures, such as Harlow Mill, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed, this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing. Harlow Mill shows a 30% shift from closure to digital ticketing.

**1.2.1. Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?**

1.2.2. It has been the long-term retail strategy for AWC to move customers to book direct via the website or the app. For example, the current advertising campaign, (June 2023-March 2024) utilises targeted media in digital and social channels to direct customers straight through to our website or app to buy tickets.

1.2.3. AWC's comprehensive programme of digital marketing directs customers searching for the most common travel terms e.g. 'London to Manchester by train' straight to our website to make a booking or download the app.

1.2.4. The loyalty programme, Club Avanti, rewards customers for booking via the web or app through a programme of benefits. The programme now has more than 200,000 members.

1.2.5. The Customer Relationship Management programme (CRM) retains customers within the digital channels through email communication of critical journey information, enhancements to web and app functionality and seasonally relevant price promotions.

1.2.6. Station and onboard posters and screens are utilised throughout the end-to-end customer journey to communicate the benefits of booking through the website and app. For example, the display of journey information in stations using QR codes that direct customers to our website.

**1.3.1. Have you made an assessment of who will not / cannot move to digital and the effect on them of closing the ticket office?**

1.3.2. The potential impacts have been assessed through Equality Impact Assessments (EIA) for each station, focusing on customers with protected characteristics. For those who are not digitally connected, to ensure there is no negative effect on these customers, at all

locations the station will remain staffed from first to last train, and during advertised hours ticketing specialists will be able to support customers with ticket purchase. Customer Ambassadors will also have access to portable devices to retail any tickets that are not available on TVMs, web or app.

***1.4.1. Do you have any forecast of the impact on revenue – i.e. on how many people will no longer travel as a result or will now travel without paying?***

1.4.2. AWC do not expect there to be a material impact on revenue from these proposals as there continues to be easy and widespread access to purchase tickets digitally and at TVMs. During the hours of ticketing support specialists, AWC will be able to assist with the full range of tickets, including aftersales support, and where required issue any ticket type via a handheld ticket issuing device.

1.4.3. The hours and provision of mobility assistance at all locations within the AWC proposal remain unchanged. Both pre-booked and Turn up and Go assistance continues to be fully available from first until last train, ensuring there is no detrimental impact to customers with assistance needs.

***1.5.1. What reassurance/evidence can you give that there will be sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours?***

1.5.2. AWC will have sufficient TVM capacity and handheld devices as part of these proposals, including during peak hours.

1.5.3. AWC have modelled a range of scenarios for the transfer of ticket sales to TVMs from the current ticket office, for all locations. To do this AWC analysed transaction times by ticket type on a TVM and overlaid it against the data of tickets being sold over the counter. This used historical transaction data from each ticket office, split into 15-minute time bands, by day of the week for FY2023. This identified the worst-case scenario of additional demand at TVMs.

1.5.4. In addition, the same date range was used to determine the current TVM usage, combining volume of tickets sold at each location via the TVMs, by ticket type sold in 15-minute segments, against the average transaction time of those ticket types. This enabled the total time that TVMs would be used in the event of all current ticket office issues transferring to TVMs. An additional 15 seconds was then added to each transaction to reflect a customer physically collecting their tickets and potentially placing them in a wallet or purse before moving away from the TVM.

1.5.5. The information from this analysis, created the total number of seconds, per 15-minute segment, by day of week, that the TVMs would need to accommodate being used for. For each TVM there is a total of 900 seconds of capacity in each 15 minute segment. This was then multiplied by the total number of AWC TVMs at each station to determine overall TVM capacity in seconds within the 15 minutes. The graphs in the Station Summaries within Appendix A, reflects the demand split by 15 minute segments, by day of the week, versus TVM capacity, and is shown as a percentage. The 4 scenarios shown are current demand, and then current demand with a 25%, 50% and 90%.

1.5.6. The 90% transition from ticket office to TVM assumes a conservative estimate of a 10% shift to digital and does not reflect a shift of current online purchased tickets away from TVM collection to a digital barcode ticket fulfilment. Currently, greater than half of all tickets issued from an AWC TVM are the collection of pre-paid tickets. Furthermore, this data assumed that 90% of ticket purchases and collection shifting from the ticket office would move to an AWC TVM and did not account or assume any shift to the TVMs at Glasgow Central, Manchester Piccadilly and Stockport operated by other TOCs.

1.5.7. In the 90% transfer from booking office to TVM scenario, we see remaining capacity at the maximum point of the day in all locations with the exception of Stoke-on-Trent, Wigan North Western and Warrington Bank Quay for a combined total across the three stations of 90 minutes per week. At Glasgow Central a second TVM will be introduced to ensure cash can be taken at all locations on TVMs where AWC is the lead retailer. This results in peak demand being less than 50% of overall TVM capacity. Those locations where short spikes of single 15-minute segments, will see staff on hand with handheld devices to support customers purchasing tickets.

**1.6.1. Has any assessment of the TVM capacity at each station been carried out? This is both in terms of overall capacity and ‘remaining’ capacity – i.e. factoring in existing sales and Ticket on Departure collection per hour from the TVM?**

1.6.2. Yes, as set out in the previous response, AWC have undertaken a review of current TVM capacity and also modelled a range of scenarios for transfer of issue volumes to TVMs. In the vast majority of these scenarios we see significant remaining capacity at the maximum point of the day. We continue to engage with the wider industry regarding supporting the continued transition to digital.

1.6.3. In the event that all current users of the ticket office move to TVM for ticket purchase, at three stations there would be instances where TVM capacity is exceeded within a limited number of 15 minutes segments. In these instances, AWC will provide colleagues with handheld devices to support the peaks. The specific capacity at TVMs against demand are shown in Appendix A and highlight where capacity is at the maximum point (defined by 15 minute time bands).

**1.7.1. Has any assessment of the location of TVMs been carried out – are they in the right place?**

1.7.2. AWC introduced new TVMs in 2021. An assessment of the TVM locations was completed in 2021 as part of the project to install the new TVMs at all stations. Where relevant, this installation included formal consultation with other TOCs, Network Rail and local authorities (under the Station Access Conditions). AWC's proposal is to move staff from behind the counter and have specialist ticketing support serving customer from the area where the main TVMs are situated. A further review of the TVM location has formed part of the recent EIA and no TVM relocations have been recommended.

**1.8.1. What mitigations do you intend to put in place to help staff ‘queue bust’ at busy times – for example, will staff have access to handheld devices to sell tickets directly?**

1.8.2. The Customer Ambassador will triage customer needs by identifying what support is required and assist with booking digital tickets or using a TVM. Customers will be directed to the correct cash/card TVM dependent on method of payments and will be asked to locate reference numbers before approaching a TVM if collecting. Staff will also have access to handheld devices which can sell the full range of tickets to the customer if required.

1.8.3. Physical queue systems or arrangements will form part of local assessments. Where required, and practicable, these will be in the form of retractable belt barriers that can be deployed permanently or temporarily in response to specific events or times of peak demand.

***1.9.1. How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?***

1.9.2. As a result of our proposed mitigations, analysis of ticket purchasing at each station and the new role our colleagues will undertake, AWC does not anticipate issues such as lengthy queues that could risk reducing customer service quality. However, AWC will continue to monitor ticket sales and customer satisfaction. Should there be issue such as lengthy queues developing at any stations, AWC will proactively introduce measures to improve the retail arrangements at that station.

1.9.3. AWC would expect any new KPIs and reporting requirements to be set nationally by the relevant industry body.

***1.10.1. What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?***

1.10.2. There will be no impact on impartial retail obligations. All AWC channels (TVMs, website and app) can retail all relevant train company products. Customer Ambassadors with specialist ticketing knowledge will continue to be trained on retail impartiality as outlined within the Ticketing and Settlement Agreement.

## Usability, functionality, and accessibility of TVMs.

### **1.11.1. TVMs are not capable of offering the same range of products and services as ticket offices. We would also ask whether any of the following can be provided from a TVM:**

- |  |   |   |
|--|---|---|
| <i>o Advance tickets and reservations</i>  | <i>o Staff travel discount</i>  | <i>o Plus Bus tickets</i>   |
| <i>o Season tickets</i>  | <i>o Buying tickets in advance rather than on the day of travel</i>   | <i>o Ferry connections</i>  |
| <i>o Railcard Sales (National and regional)</i>  | <i>o Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements)</i> | <i>o Group Save</i>   |
| <i>o Apex single and return tickets</i>  |   | <i>o Off-peak purchases before the off-peak begins</i>                    |
| <i>o Car park tickets</i>  |   | <i>o Cycle reservations</i>   |
| <i>o Refunds</i>   | <i>o Seat reservations</i>  | <i>o Photocards for season tickets</i>                                    |
| <i>o National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)</i> | <i>o Changing a booking/tickets</i>   | <i>o Scholar tickets</i>  |
|  | <i>o Use of rail vouchers</i>   | <i>o Sleeper bookings</i>   |
| <i>o Boundary Zone add-ons</i>   | <i>o Use of rail warrants</i>   | <i>o CIV tickets for connections with Eurostar international services</i> |
|  | <i>o Ranger and Rover tickets</i>   |   |

1.11.2. A full list of the availability of these tickets is shown within Appendix B – TVM Product Range. In all examples, where a ticket is not available from an AWC TVM, staff will be able to retail the product from a handheld ticket issuing device.

### **1.12.1. Are there any other products, not mentioned in the list above, that passengers will no longer be able to easily purchase from the station if the ticket office is closed? How will passengers access these products and services in future?**

1.12.2. All products which are currently available at AWC stations will continue to be offered at stations by AWC TVMs or via Customer Ambassadors using handheld devices that are able to retail the full range of tickets.

### **1.12.3. Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?**



1.12.4. AWC's TVMs are industry leading, introduced in 2021 and already have a number of advanced features including the ability to retail season tickets, advance purchase tickets, seat picker and to select any origin and destination. AWC have a roadmap of ongoing enhancements and software upgrades to further improve TVMs. As an example, the recent enhancements which have been made are:

- Ability to pick up bookings using contactless capabilities on the customer smartphone;
- To show trains which have been cancelled trains and no longer running with information highlighting that they have been cancelled;
- Highlighting on the search results page to make it really clear the train departs the next day (especially useful for customers searching for services late in the day);
- Redesign of the Quick Buy section following customer feedback and customer research;
- Further seat picker enhancements will be added by the end of September 23.

1.12.5. Further improvements are planned in collaboration with the wider industry, in most cases these changes will be completed mid- to late-2024, however a number of interim mitigations are proposed to ensure passengers are not disadvantaged, with the primary one being staff available around TVMs with quick and easy access to handheld ticket issuing devices. Final plans for TVM updates will be dependent on funding agreements and supplier contracts. The industry has already identified that 99% of products by demand sold at ticket offices today can be obtained from a TVM or online.

***1.13.1. Will staff be able to access a ticket machine, or be issued with handheld machines to sell tickets not available from the TVM?***

1.13.2. AWC's new Customer Ambassador roles will have quick and easy access to handheld ticket machines to facilitate sales that cannot be undertaken by other methods.

***1.14.1. How many handheld devices will be available per shift – enough for all retail staff on duty?***

1.14.2. AWC will retain a pool of handheld devices across the 20 stations where they are the lead retailer. At each location, there will be enough devices for all ticketing specialist staff on duty and there will also be spare devices.

***1.15.1. How accessible are the handheld devices? Will staff be carrying them or will they have to access them from a secure location?***

1.15.2. AWC's Customer Ambassadors will have quick and easy access to the handheld devices which will be available from the start and throughout their shift, either carrying them or storing them securely within, or close to, the TVM area.

***1.16.1. What is the transaction time difference between purchasing a ticket from the ticket office, TVM, or from a handheld device?***

1.16.2. Transaction times will be broadly similar to now. Transaction time varies considerably dependent on transaction type and the experience of the individual. To start with, customers unfamiliar with a TVM may take longer but that is why there will be specialist ticketing experts available to support.

1.16.3. An assessment of timings/throughput/capacity at TVMs has been undertaken which identifies that all locations will have sufficient capacity to retail tickets following ticket office closures.

1.16.4. Handheld devices will also be on hand to support in retailing tickets. The devices currently used within AWC ticket offices are the same devices staff will use following any ticket office closures. Therefore, transaction times using the handheld device will be similar to now. As above, transaction time varies considerably dependent on transaction type and the experience of the individual.

***1.17.1. Can passengers always purchase a ticket from a TVM at the station for a train, even if that train is shown as 'sold out' and not available to purchase online? If not, how will passengers continue to be able to 'walk-up' and travel?***

1.17.2. Yes. All AWC TVMs enable a customer to buy walk-up products for travel on AWC services, even if the service is shown as sold out. In addition, handheld devices utilised by Customer Ambassadors will be able to retail any product in line with the Ticketing and Settlement Agreement should a customer be unable to book digitally or find the product they require from a TVM.

***1.18.1. How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets?***

1.18.2. AWC have been informed that at this time, the RDG are not looking to withdraw any products. AWC are aware that the RDG may be simplifying processes, such as removing photocard requirements for season tickets, but withdrawal of products would require a full and formal review of the ticketing and fares system. This is not within the remit of this consultation or these proposals.

1.18.3. AWC will continue to retail the full range of tickets required by the Ticketing and Settlement Agreement.

***1.19.1. How will disabled people who cannot use a TVM purchase a ticket?***

1.19.2. Customers may be able to use web and app where appropriate. The AWC website has achieved Shaw Trust Web Accreditation – a mark confirming it has been tested by people with a wide range of disabilities and found to be accessible.

1.19.3. For those who do not use web and app, AWC also have a contact centre phone booking option available 0800-2200 seven days a week, and, as set out above, also propose to have Customer Ambassadors available at each station during advertised hours with specialist ticketing knowledge to help and support customers in purchasing a ticket through the most appropriate method.

1.19.4. These methods include: guiding customers through purchasing a ticket through online channels, aiding and supporting customers in using the TVM, however where this is

not appropriate, the Customer Ambassador will be able to retail a ticket using a handheld device.

1.19.5. As outlined with the AWC Accessible Travel Policy (ATP), if a customer is unable to purchase a ticket at the station, they will be able to buy on board without penalty.

**1.20.1. How will people summon a member of staff if they need help while using a TVM (i.e. the equivalent of the 'red light' at a supermarket self-checkout till)?**

1.20.2. AWC staff with specialist ticketing knowledge will be present in the TVM area during advertised hours, where they will actively look for customers who may need assistance.

1.20.3. AWC is not proposing to develop a specific function for TVMs to summon assistance as staff presence will be maintained around TVMs at stations during advertised hours, and there will be access to handheld ticketing devices to support customers.

**1.21.1. Is it proposed to upgrade TVMs to offer remote access/video help facilities?**

1.21.2. Due to AWC stations having a staff presence from first until last train and Customer Ambassadors with specialist ticketing knowledge at advertised times throughout the day, this function is not being added.

**1.22.1. Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability? This includes whether they are under cover, whether passengers queuing are protected from the weather and whether they can be read in direct sunlight?**

1.22.2. TVMs have been developed against existing accessibility standards. They have the screen and card readers at a height that is usable for customers in wheelchairs, they are all undercover and protected from the weather. In addition, the screen has antiglare properties so that it can be read in direct sunlight.

1.22.3. As part of AWC's commitment to continually improve the experience of rail travel for customers with accessibility needs, user trials of TVMs commenced on Saturday 9 September 2023 and are planned to be completed by the end of September 2023. AWC will be happy to update Transport Focus on the outcome of the user trials once they have concluded.

***1.23.1. What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs?***

1.23.2. We have a range of contractual service level agreements and expected response / resolution times in place with the TVM maintenance supplier and will continue to use our procurement opportunities to support customer satisfaction as well as efficient use of taxpayer money. The response times vary based on the severity of the incident. Due to the commercial sensitive nature, specific SLAs will be provided separately to Transport Focus as supplementary information.

***1.24.1. What are the procedures to ensure TVMs are replenished with stock?***

1.24.2. AWC have developed real time monitoring of TVM activity that identifies issues such as low ticket stock, low cash levels etc. Station based colleagues receive real time alerts on their personal issue smart device of such events to allow them to respond quickly in a proactive manner. A back office team will also monitor activity to ensure the TVM fleet is operating effectively.

***1.25.1. Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?***

1.25.2. AWC will comply with any industry regulations introduced for TVMs around queuing times. Customer experience in ticket retailing at stations will be monitored through our mystery shopping programme and customer feedback. Customer Ambassadors will be available to triage customer needs at TVMs, which will help to reduce queuing times.

1.25.3. As a result of our proposed mitigations, analysis of ticket purchasing at all station and the new role our colleagues will undertake, AWC does not anticipate issues such as lengthy queues that could risk reducing customer service quality. However, we will continue to monitor ticket sales and customer satisfaction. Should we see an issue such as lengthy queues developing at stations, we will proactively introduce measures to improve the retail arrangements.

## **Availability of staff to provide retail advice and help.**

### ***1.26.1. What rationale was used for determining to close all ticket offices?***

1.26.2. AWC have seen a significant shift towards digital ticketing and changes in customer behaviour. Today, on average just 6% of customers purchase tickets across the counter from stations where AWC are the ticket office retailer. The functionality on web, app and TVM, combined with the current ticket office equipment capable of being used as a handheld mobile device, allows the full range of tickets to be sold and in person interaction with staff where required. This enables staff to move out from behind the counter to be visible to all, and creates the opportunity to be more proactive in identifying customers who may need assistance, offers a reassuring presence, whilst, combined with rosters built on transaction data, delivers a more efficient operation.

### ***1.27.1. How does the role of a Customer Ambassador in more open spaces differ from a ticket office?***

1.27.2. The AWC Customer Ambassador role differs from a traditional ticket office role by being more flexible to identify and move to (and with) customers requiring support. The open space location will enable the Customer Ambassador to meet a wider range of customer needs and have the ability to be where the customer is located to meet their needs.

### ***1.28.1. Are the proposed (reduced) retail staffing levels at stations sufficient to ensure assistance with ticket purchases can still be offered at busier times alongside other duties? Do you have any evidence / assessments to support this?***

1.28.2. AWC have analysed the customer retailing data for each station and have proposed new hours and FTE numbers for staff offering specialised ticketing support. The new proposed hours are aligned to customer demand for ticket retailing.

1.28.3. The volume of journeys purchased at stations has declined over the previous ten years at a faster rate than ticket office staff have been reduced, therefore whilst they represent in some locations a reduction of current FTE, they are not a reduction on current resource needs to meet current ticket office demand. This, combined with the TVM capacity information, results in AWC being able to demonstrate that there is sufficient capacity to meet future ticket sales at the station, including during peak times, whilst still enabling staff to be visible and proactive in supporting customers with information needs.

***1.29.1. What training will multi-skilled Customer Ambassadors have in ticketing/product range to ensure they can provide expert assistance necessary to navigate the complex fares system and ensure passengers get the right ticket?***

1.29.2. The AWC proposed Customer Ambassador roles for ticketing specialists will continue to receive the same standard of ticket knowledge and training as our existing ticket office staff have today, which will ensure that customers continue to get support in finding the correct ticket. This training encompasses all relevant sections of the TSA on ticket retailing.

***1.30.1. How will people find a Customer Ambassador at the station if they are no longer in the ticket office: will there be a central point / method for calling them? What will the queuing arrangements be when multiple passengers want help/advice?***

1.30.2. There will be staff at stations – both those managed by AWC and at major stations managed by Network Rail - from first to last train. This will include Customer Ambassadors with specialist ticket knowledge in the vicinity of TVMs at specified times.

1.30.3. Passenger assistance meeting points will be in place at stations managed by AWC. These will provide a single focal point at each station, with consistent signage, for customers who need additional support from station staff. Customers will enter the station and proceed to the Passenger assistance meeting point. They will contact staff, either in person or via a Help Point.

1.30.4. Potential locations have been identified at each station for the Passenger assistance meeting points, and these are summarised in the EIA for each station. Passenger assistance meeting points are already in place at stations managed by Network Rail.

1.30.5. In relation to queueing arrangements, physical queue systems or arrangements will form part of local assessments. Where required, and practicable, these will be in the form of retractable belt barriers that can be deployed permanently or temporarily in response to specific events or times of peak demand.

***1.31.1. Will the use of a handheld device be a reluctant last resort if you cannot encourage passengers to purchase a ticket by an alternative channel?***

1.31.2. AWC propose to have Customer Ambassadors available at each station to help and support customers in purchasing a ticket through the most appropriate method. These methods include: aiding and supporting customers in using the TVM, however where this is not appropriate, the Customer Ambassador will be able to retail a ticket using a handheld device. Other methods include guiding customers through purchasing a ticket through online channels.

## **Paying by cash**

***1.32.1. Have you made any specific assessment of the ability of TVMs to cope with the increase in cash, especially at stations where there is a higher than average use of cash to purchase tickets?***

1.32.2. AWC have developed real time monitoring of TVM activity that identifies issues such as low ticket stock, low cash levels etc. Station based colleagues receive real time alerts of such events and a back office team will also monitor activity to ensure the TVM fleet is operating effectively. AWC TVMs have modern cash recyclers that minimise the need for replenishing and ensure they can cope with the expected volume of cash transactions. Before going off duty retail staff will ensure wherever possible that TVMs are in full working order and that cash levels will be sufficient to ensure the machines remain in service overnight.



1.32.3. AWC have undertaken an analysis of all current cash transactions at all locations at both TVMs and over the counter at ticket offices. TVM capacity by day of the week, in 15 minute segments has then been undertaken to demonstrate that the TVMs have capacity for both the volume of cash and volume of transactions. Should there be a sudden spike in the demand for cash transactions at TVMs, staff will be on hand with handheld devices to sell tickets and accepting cash.

***1.33.1. If a person cannot pay by cash what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?***

1.33.2. AWC will make every effort to ensure customers understand their obligations to have a ticket to travel. If for any reason a customer is unable to buy the correct ticket with cash at either a TVM or via a customer ambassador with a handheld device, and they do not have a different method of payment, AWC will allow customers to buy on board.

***1.34.1. How will passengers with cash be able to buy the products listed above in relation to TVMs?***

1.34.2. AWC will have at least one cash TVM at each station where AWC are the lead retailer. Staff will also be available to assist customers in purchasing a ticket with cash using a handheld ticketing device.

***1.35.1. Will all stations have TVMs that accept cash?***

1.35.2. Yes. AWC will have at least one cash TVM at each station where AWC are the lead retailer including an additional cash TVM at Glasgow Central.

**2. Issues relating to whether passengers requiring assistance to travel receive that assistance in a timely and reliable manner.**

**2.1.1. We welcome the station specific EIAs. However, the proposed mitigations are almost identical at all 19 stations affected, which could be seen as a consistent approach or might not take into account the physical/practical implications of the proposals and the safety and security elements at each individual station.**

2.1.2. Station specific EIAs have now been updated following the feedback received through the pan-disability public consultation, including ongoing discussions with Avanti West Coast Accessibility Panel and regional accessibility panels. Station specific EIAs include information such as proposed specialist ticketing support hours for each station. The documents take into account specific features of each station such as where there is more than one entrance to a station. Station Specific EIAs will be made available on the AWC website.

**2.2.1. Even where staff presence has been maintained, in many instances the number of staff available has been reduced. And in other instances, the staff member will now have multiple functions to perform rather than just retail. We would like to be reassured on issues detailed in the proposal and EIA.**

2.2.2. AWC have analysed the customer retail ticketing data for each station and have proposed new hours for staff offering specialised ticketing support. The new proposed hours of specialist ticketing staff have been chosen to align with recent ticket sales data and therefore to reflect the volumes of customer transactions. This can be viewed within Appendix A – Station Summaries.

2.2.3. Passenger Assist Turn Up and Go services and booked Assistance will continue to be managed by the Station Operational team and there are no planned changes to this process within the AWC proposal.

**2.3.1. When the ticket office is closed how will turn up and go assistance for disabled passengers be maintained? If this is reliant on station staff how will passengers be assisted to move around the station to the platform / to purchase the correct ticket / get advice / journey plan? How will passengers alert staff if they haven't pre-booked assistance?**

2.3.2. There will be no changes to the turn up and go assistance for disabled passengers at AWC stations. The Passenger Assist Turn Up and Go services and booked Assistance will continue to be managed by the Station Operational team at stations managed by AWC and there are no planned changes to this process within the AWC proposal. Passenger assistance meeting points will be in place to provide a focal point for customers requiring this type of support from a member of staff.

2.3.3. Passenger assistance meeting points will have the following features: (1) Able to be used from first to last train; (2) Easily identifiable through consistent signage; (3) Staff available to support customers from this meeting point either in person or via Help Point; (4) Accessible seating available close by. Similarly, arrangements for Passenger assistance at stations managed by Network Rail stations will not be affected by these proposals. Passenger assistance meeting points are already in place at Network Rail stations.

**2.4.1. *If the mitigation is to provide an accessible taxi what processes will be put in place and what is your assessment of the adequacy of this compared with travel by train? i.e. how easy is it to source accessible taxis and how reliable are they.***

2.4.2. No mitigation to the proposed ticket office closures involve an accessible taxi. AWC stations will continue to be staffed from first until last service and staff will be on hand to assist customers at the stations and on and off trains.

2.4.3. AWC do use accessible taxis, these are currently sourced in times of disruption, either planned or unplanned. Sourcing accessible taxis to transport customers will not change as a result of these proposals.

**2.5.1. *What monitoring regimes will be put in place to measure time taken and reliability?***

2.5.2. Accessible taxis are currently sourced in times of disruption, either planned or unplanned. Sourcing accessible taxis to transport customers will not change as a result of these proposals.

**2.6.1. How will people summon help if staff are not there?**

2.6.2. There will be staff at stations managed by AWC and at major stations managed by Network Rail from first to last train. This will include Customer Ambassadors in the vicinity of TVMs at specified times. There are Assisted Travel Lounges at NR stations and Passenger assistance meeting points will be in place at stations managed by AWC. These will provide a single focal point at each station, with consistent signage, for customers who need additional support from station staff. Customers will enter the station and proceed to the Passenger assistance meeting point. They will contact staff, either in person or via a Help Point. Calls from the Help Point are directed to staff at the station.

2.6.3. Potential locations have been identified at each station for the Passenger assistance meeting points, and these are summarised in the EIA for each station. Passenger assistance Lounges/meeting points are already in place at stations managed by Network Rail.

**2.7.1. Do all stations have tactile paving fitted along the entire length of each platform face – the need for this is increased if the station is to have no or less staff in future? If not, which stations do not have this?**

2.7.2. There are no proposals at any of the 19 stations under consultation with Transport Focus where AWC is proposing to reduce the hours of coverage or head count of staff on platforms or of those undertaking booked or turn up and go Passenger assistance. Tactile paving is in place at all AWC stations with the exception of Crewe station. Installation of tactile paving at Crewe is planned by Network Rail to start in September 2023 and to be completed by the end of October 2023.

**2.8.1. Are staffing levels sufficient to ensure assistance can still be offered at busier times alongside other duties? Do you have any evidence or analysis that addresses this?**

2.8.2. Passenger Assist Turn Up and Go services and booked Assistance will continue to be managed by the Station Operational teams at stations (or by Network Rail at stations

managed by Network Rail) and there are no planned changes to this process within the AWC proposal.

**2.9.1. What assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?**

2.9.2. Passenger Assist Turn Up and Go services and booked Assistance will continue to be managed by the Station Operational team and there are no planned changes to this process within the AWC proposal. Providing Passenger assistance to customers with accessibility needs will continue to be prioritised. Similar arrangements are in place at stations managed by Network Rail.

**2.10.1. How will staff at the station know if passengers need help to board?**

2.10.2. Station Operational teams at stations managed by AWC will continue to manage the Passenger assistance Process. This process ensures all customer needs are met including help with boarding a train. If passengers have booked Passenger assistance, all station colleagues have access to this information and use it to support customers. If a customer has not booked, the Passenger assistance meeting points will be easily identifiable to customers. Customers will be able to contact staff within these areas. Similar arrangements are in place at stations managed by Network Rail.

**2.11.1. Passengers, especially disabled passengers, may find it more difficult to find and get help from redeployed staff at stations. Currently passengers know to approach the ticket office – it is the focal point. We understand that guide dogs are trained to go to the ticket window, and it is also the case that ticket windows have induction loops to help people hear. Passengers need to know where they should go to reliably find staff or be able to notify staff that they need assistance.**

2.11.2. There will be staff at stations managed by AWC and major stations managed by Network Rail from first to last train. This will include Customer Ambassadors in the vicinity of TVMs at specified times. Passenger assistance meeting points will be in place at all AWC stations. These will provide a single focal point at each station, with consistent signage, for customers who need support from station staff. Customers will enter the station and proceed

to the Passenger assistance meeting point. They will contact staff, either in person or via a Help Point. Customers will be able to wait for assistance in a comfortable and accessible seating area. This will be an improvement compared to current Passenger assistance meeting points, which are located within the Ticket Office in 12 AWC stations, as there will be a single point at each station able to be used from first to last train, easily identifiable through consistent signage.

2.11.3. Potential locations have been identified at each station for the Passenger assistance meeting points, and these are summarised in the EIA for each station. Passenger assistance meeting points are already in place at stations managed by Network Rail.

2.11.4. There will continue to be induction loops available at all AWC stations to help customers communicate with staff.

#### ***2.12.1. How will the focal point of the ticket office/window be replicated?***

2.12.2. Passenger assistance meeting points will act as a focal point for people requiring assistance. These will have the following features: (1) Able to be used from first to last train; (2) Easily identifiable through consistent signage; (3) Staff available to support customers from this meeting point either in person or via Help Point; (4) Accessible seating available close by.

2.12.3. Potential locations have been identified at each station for the Passenger assistance meeting points, and these are summarised in the EIA for each station. Passenger assistance meeting points are already in place at stations managed by Network Rail.

#### ***2.13.1. How will people summon help if staff are not there?***

2.13.2. Passenger assistance meeting points will be in place at all AWC stations. These will provide a single focal point at each station, with consistent signage, for customers who need support from station staff. Customers will enter the station and proceed to the Passenger assistance meeting point. They will contact staff, either in person or via a Help Point. Passenger assistance meeting points are also in place at stations managed by Network Rail.

**2.14.1. Will induction loop facilities be provided elsewhere on the station/concourse?**

2.14.2. There will continue to be induction loops available at all AWC stations to help customers communicate with staff, including during ticketing enquires and purchase.

**2.15.1. What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?**

2.15.2. As set out in the AWC ATP, AWC will closely monitor how we follow all aspects of our ATP. AWC will also track how we keep to our legal requirements and industry guidelines and measure our performance against our accessibility goals and targets, particularly focusing on feedback from customers. The results will help to guide and prioritise AWC's efforts to improve accessible travel. AWC will monitor and evaluate:

- Response times for Passenger Assist bookings, however the booking is made;
- Any failure to provide booked assistance;
- The number of booked assistance requests;
- The number of 'turn up and go' requests;
- The availability of accessible features, for example, accessible toilets and lifts;
- Satisfaction scores for Passenger Assist, broken down by each station;
- Whether improvement plans are delivered on time; and
- Customer complaints about accessibility.

2.15.3. AWC will evaluate results every four weeks and carry out an in-depth review each year. They will share information and the results of their evaluation across industry forums, such as the Rail Delivery Group (RDG), and with the Office of Rail and Road (ORR), fully keeping to the ORR's core data reporting requirements, including giving them details of any of their main actions to improve performance.

### 3. Issues relating to whether passengers can get the information they require to plan and make a journey, including during periods of disruption.

**3.1.1. How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?**

3.1.2. AWC will provide leaflet information racks, predominantly within the concourse area to make all current ancillary information readily available. Where the station concourse layout prohibits this, other station areas will be identified which will be easily accessible locations for customers.

**3.2.1. What devices will staff have – e.g. will they be able to print journey itineraries for passengers who ask for one?**

3.2.2. The devices currently used within AWC ticket offices are the same devices staff will use following any ticket office closures, these are mobile enabled and can be docked and undocked which enables more flexibility for staff to be able to support customers. These devices have a print functionality for customers requiring printed information. All staff also have personal issue smart devices with a range of public and company bespoke apps, to ensure they are able to provide timely, relevant, consistent and accurate information.

### 4. Issues relating to ensuring passengers are not penalised if they cannot buy the ticket they require from the station.

**4.1.1. Proposals to remove ticket offices that rely on TVMs that are not fully accessible, do not sell the full product range or do not accept cash will mean more passengers are unable to buy the right ticket before they board the train. Passengers must be made aware that they can board a train without a ticket if they cannot buy the**



***ticket they need from the station and be confident they will not be penalised if they do so. This must include people who are not able to use a TVM because of a disability.***

4.1.2. AWC continues to consider carefully the implications on those customers with accessibility needs and is also identifying mitigations for the small number of products that cannot be retailed on TVMs alongside the RDG. AWC will make every effort to ensure customers understand their obligations to hold a ticket or authority to travel before they board a train where there was the opportunity to buy one and where not possible will support customers in being able to purchase onboard, at intermediate stations or at arrival location when required in line with the current conditions of carriage.

4.1.3. As outlined with the AWC ATP, if a customer is unable to purchase a ticket at the station, they will be able to buy on board without penalty.

***4.2.1. Signage at a station must not send contradictory messages. For example, Penalty Fare notices that require you to have a ticket before boarding a train need to be consistent with other notices that may instruct people to buy certain tickets on board.***

4.2.2. AWC will ensure all signage at AWC stations is updated, accurate and reflective of the final industry position on revenue protection/penalty fares schemes as part of a review of any changes needed following this consultation.

***4.3.1. What changes to ticketless travel rules will be made / where will these be written down to give people who can't buy a ticket some assurances that they won't be penalised?***

4.3.2. AWC do not currently operate a penalty fares scheme and will allow customers to buy on board where a valid ticket cannot be purchased in advance without penalising. For other train companies whose services operate through AWC stations we will ensure signage is updated, accurate and reflective of industry position on revenue protection/penalty fares schemes.

4.3.3. AWC will make every effort to ensure customers understand their obligations to hold a ticket or authority to travel before they board a train where there was the opportunity to buy one and where not possible will support customers in being able to purchase onboard, at intermediate stations or at arrival location when required in line with the current conditions of carriage.

**4.4.1. What processes will be in place so that passengers do not have to publicly declare/evidence their disability to buy on the train without penalty?**

4.4.2. In line with the current AWC revenue protection policy only full price Anytime tickets with no discount can be purchased on board our trains. However, in line with the AWC Assisted Travel Policy (ATP) if it is difficult for you to buy a ticket before you travel due to your disability, you will be able to buy tickets on board the train or at your destination. You will still receive any fare reductions that you are entitled to, and you won't be penalised for travelling without a ticket. All our staff have undertaken disability awareness training and are skilled to deal with this sensitively.

**4.5.1. How will you review signage to avoid sending inconsistent messages about revenue protection?**

4.5.2. AWC will ensure all signage at AWC stations is updated, accurate and reflective of industry position on revenue protection/penalty fares schemes.

## **5. Issues relating to whether passengers can continue to use facilities at a station.**

**5.1.1. From the information provided it appears that access to vital station facilities including lifts, waiting rooms and toilets will be maintained at all stations. Can you confirm that access to all station facilities will be maintained with the proposed closure of ticket offices?**

5.1.2. AWC can confirm that there will be no change to the current arrangements for access to station facilities such as lifts, waiting rooms and toilets at stations managed by AWC.

**5.2.1. We understand that alarms for ‘disabled’ toilets are often located in ticket offices. Is this the case and, if so, where will these be fitted?**

5.2.2. Accessible toilets at AWC stations all have alarms for when a customer needs help. Currently, accessible toilet alarms do not divert to a ticket office. Instead, alarms either make a loud noise across the station, or in most cases, are diverted to the Customer Service Team Leaders, or Announcer’s office. These proposals will not change this process.

**5.3.1. One issue emerging, concerns the operation and reliability of ‘Help Points’ at stations. If staff have been removed or are harder to find, passengers will be increasingly reliant on Help Points to obtain assistance and information. However, research by the ORR [ATP Implementation. Review of unbooked assistance and Help Points – 2022] identified a number of issues with their use. The report suggested that it may be difficult for disabled passengers to have confidence in boarding a train if they request assistance from a Help Point at an unstaffed or partially staffed accessible station.**

5.3.2. Stations managed by AWC will be staffed from first to last train and station staff will carry out Passenger assistance. Help Points are in place at all AWC stations. Help Points calls go to relevant staff at each station. A diversion is in place if for some reason a call is not answered. Help Points will continue to be regularly tested, with remedial measures in place if needed. Similar arrangements are in place at stations managed by Network Rail.

**5.4.1. Are Help Points at every station and are they in an accessible location? Are there any plans to position Help Points in concourse areas near ticket offices to avoid having to walk along platforms or over bridges to summon help?**

5.4.2. There are Help Points in accessible locations in every AWC Station. For customers requiring help with purchasing tickets, there will also be specialist ticketing support staff based by the TVMs in specified hours.

5.4.3. In addition, AWC stations are staffed from first train to last train. For customers requiring assistance to board trains then at Network Rail Managed Stations there are Passenger assistance Lounges and Passenger assistance meeting points will be in place at all AWC stations. These will provide a single focal point at each station, with consistent signage, for customers who need support from station staff. Customers will enter the station and proceed to the Passenger assistance meeting point. They will contact staff, either in person or via a Help Point. Potential locations have been identified at each station for the Passenger assistance meeting points, and these are summarised in the EIA for each station. Similar arrangements are in place at stations managed by Network Rail.

**5.5.1. *What are your existing processes and SLAs for monitoring that Help Points are working and the response time to repair faults? What future commitments can you give?***

5.5.2. There are two types of Help Point on the AWC estate and the associated maintenance contracts include a range of contractual service level agreements and expected response / resolution times, depending on the severity of the fault. Due to the commercially sensitive nature, specific SLAs will be provided separately and confidentially to Transport Focus. AWC will continue to use our procurement opportunities to support customer satisfaction as well as efficient use of taxpayer money.

**5.6.1. *What are the standards for answering Help Points (i.e. within how many seconds)?***

5.6.2. Current processes ensure that a Help Point is diverted to a secondary number after a set amount of time (usually 30 seconds). The diversion is in place if a call is not answered (e.g. if a staff member is dispatching a train) and then the call will divert to another local phone (e.g. announcer's phone).

**5.7.1. *How will you monitor/report time taken to answer Help Point calls / proportion not answered?***

5.7.2. In addition to local station Team Leader inspections, an independent Service Quality Regime auditor under a regime specified by the Department for Transport (DfT) tests all

Help Points at all stations, every 4 weeks. They will record a failure if the Help Point is not answered within 30 seconds.

**5.8.1. Do you have enough resource in place to ensure that an increase in calls via Help Points can be answered promptly and in accordance with standards?**

5.8.2. AWC will maintain staff at stations from first to last train, as well as specialist ticketing support during specified hours. As a result, we do not believe that there will be an increase in calls via Help Points. However, we do agree that where Help Points are used by customers it is vital that they are answered promptly and in accordance with standards.

## **6. Issues relating to whether passengers feel safe at the station.**

**6.1.1. Have you liaised with the British Transport Police (BTP) about the impact on staff and passenger security?**

6.1.2. Safety and security is a key priority and AWC has regular engagement with the British Transport Police to understand any safety and security trends on our network. We have also had specific conversations with BTP about the proposals of this TSA major change consultation. These focussed on the potential impact on both station staff and the public, in addition to property and infrastructure. BTP have agreed to work with AWC as part of any proposed implementation to ensure crime and security considerations remain a key priority of the project.

6.1.3. In addition to this, the DfT and BTP have agreed that Operators should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals once discussions with the Passenger Bodies have been finalised. This assessment was produced by DfT in collaboration with the BTP for TOCs to complete for each station. Due to the AWC Secure Stations Accreditation, there are already a number of mitigating factors in place against the reportable crime categories.

### **6.2.1. Are any mitigations planned?**

6.2.2. Due to the AWC Secure Stations Accreditation, there are already a number of mitigating factors in place against the reportable crime categories. Further mitigations have been considered for staff security, including the equipment they have such as Body Worn Cameras. These will be explored further with staff representatives if any proposed plans are to be implemented.

6.2.3. CCTV coverage and lighting reviews, in addition to positions of safety and training will form part of future risk assessments and mitigations that will be considered and discussed further with BTP.

### **6.3.1. Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?**

6.3.2. The CCTV at all AWC station is currently in line with all industry security guidelines. The CCTV is accessible remotely enabling both the 'live' viewing of CCTV, and the reviewing of previously captured footage remotely.

## **7. Other issues:**

### **Future Changes**

#### **7.1.1. What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?**

7.1.2. AWC will continue to monitor customer insight data to determine the effectiveness of the customer proposition and hours of coverage. Rosters may change for operational reasons (for example, timetable changes), or to ensure customer needs and demands are

reflected in the hours and volume of staff coverage. AWC have built in spare coverage to mitigate against annual leave. This, combined with a range of internal policies and procedures to manage sickness and support employee health and wellbeing support the ultimate aim to ensure a workforce that is fit and able to deliver their rostered shifts.

***7.2.1. Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?***

7.2.2. One option would be to use the existing Assisted Travel Policy, which is regulated and enforced by the ORR and requires stakeholder involvement to make changes to provisions at stations.

***7.3.1. How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?***

7.3.2. Staffing hours for AWC ticket offices and arrangements are advertised on our website and wider industry websites, in addition to at the station. AWC will continue to display information regarding ticketing, to enable customers to know when ticketing specialist staff will be available. This will be done at the station and online on the AWC website. The information will also be made available to third parties such as Network Rail and National Rail Enquires to enable them to display the hours of ticketing specialist staff in much the same way current ticket office hours are displayed today.

***7.4.1. How will compliance with any agreed new hours be monitored and reported?***

7.4.2. One option would be to use the existing Assisted Travel Policy, which is regulated and enforced by the ORR and requires stakeholder involvement to make changes to provisions at stations.

***7.5.1. What arrangements have been made to provide staff cover for things like sickness and holiday?***

7.5.2. The proposed rosters have spare coverage built in which is over and above the minimum percentage required to cover all annual leave. Each location will have a maximum number of staff that will be allowed annual leave at any one time, to ensure that staffing levels can be maintained.

## **Timing of mitigations**

### ***7.6.1. What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?***

7.6.2. The primary mitigation in the short term is Customer Ambassadors having access to handheld ticket issuing devices, which can retail the full range of products and accept all industry agreed payment types.

### ***7.7.1. Is there any reason that Transport Focus should not object to the change until the mitigations have implemented and can be demonstrated to be adequate?***

7.7.2. AWC believe that the mitigation proposed has been proved as adequate. The current retailing system used in the ticket office, Avocet, is able to be used as a mobile device. It has been in operation since 2018 and is able to retail the full range of tickets. The combination of TVMs with their current software and functionality, and the Avocet machine used by staff to issue tickets in person has proved adequate in meeting customer needs since their introduction.

7.7.3. Ultimately, the only change in the ticket issuing systems proposed is the enhancements to the TVM functionality to meet some of the fewer than 1% of ticket office transactions that they cannot perform. For that reason, AWC believe that with the combination of staff being on hand at TVMs to support their use, and with the mitigation to issue tickets via a handheld, provides an adequate way of meeting customer needs. The Avocet ticket issue equipment following its introduction in 2018 has proved a reliable platform for staff to retail the full range of tickets, and capable of fulfilling all requirements of the Ticket and Settlement Agreement.



**7.8.1. Has any necessary funding / agreement been secured to implement any mitigations?**

7.8.2. The RDG has agreed in principle with the DfT that funding support for retail enhancements will be available, but the release of this funding will obviously be subject to the conclusion of the consultation process and the ticket office closure plan going ahead.

7.8.3. In his letter to the Chair of the Transport Select Committee, dated 11 September 2023, the Minister of State for Transport, Huw Merriman MP, has confirmed that no final decisions will be made until after the consultations have been concluded. He states: “When authorising Operators to commence TSA consultations, the DfT set out at range of parameters with which an Operator's proposal must comply. Operators then took action to consult on ticket office changes in line with the rail industry's TSA. The DfT has not approved any proposal put forward by an Operator and will not do so until consultations are concluded.”

7.8.4. The primary retail mitigation remains ticketing specialist staff having access to handheld ticket issuing devices, in the event of an accessibility need or a ticket that is not available from a TVM. The handheld device will retail the full range of tickets as the current ticket office.

## **Liaison with other operators**

**7.9.1. What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?**

7.9.2. AWC when considering the changes proposed focussed on the impact to all customers using the station, rather than a specific group of those boarding specific services. This ensured that not only did the changes propose address the needs of delivering the AWC operation, including the customer experience, the proposals also considered all other station users and the obligations that AWC have in providing customer experience and other

contractual related activity such as train dispatch, customer information and mobility assistance.

7.9.3. As part of the consultation process all other train companies have had access to AWC's proposals. TOCs have met bi-weekly at a collective forum chaired by the RDG and met individually where required. No other operator has objected to AWC's proposals.

***7.10.1. Have any discussions been had with Network Rail about the impact at NR managed stations?***

7.10.2. AWC work closely with Network Rail across our operation including at the NR managed stations in the scope of this consultation: Glasgow Central, Manchester Piccadilly, Birmingham New Street and London Euston. Network Rail stations managers were briefed on the launch of the public consultation. Discussions with Network Rail station managers has been ongoing, and will continue as part of any proposed implementation to ensure there are no negative impacts on the wider station customer experience, operation or safety and security.

AWC believe the information provided demonstrates how we will continue to ensure passengers enjoy widespread and easy access to the purchase of rail products, and that the provision of Passenger assistance for both booked, and Turn Up and Go, passengers will continue to be provided from the first until last train.

Please do not hesitate to get in contact if you require further information or have any clarifications or questions. Please could you also let me know if you continue to have any concerns or develop any new concerns, to give AWC the opportunity to refute or clarify before a final decision is taken.

Yours sincerely

Clare Kingswood  
(Interim) Executive Director, Stations

## Appendices

Appendix A – Station Summaries

Appendix B – TVM Product Range

Appendix C – Equality Impact Assessment