

Avanti West Coast's proposed changes to ticket offices: Transport Focus response

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

1. Introduction

This is Transport Focus's formal response to Avanti West Coast's (AWC) proposal to change ticket office opening hours at regulated stations. It outlines responses received during the public consultation which began on 5 July 2023 and then sets out Transport Focus's conclusions.

Transport Focus recognises that the way many passengers buy their ticket has changed, with increasing numbers choosing to buy online, use apps or Pay As You Go contactless payment. We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 12 per cent of sales on average.

We acknowledge that the proposal was designed to respond to this shift in customer behaviour, with the aim of bringing staff out from ticket offices to better meet customer needs. It is important to stress that Transport Focus is not against the principle of 'bringing staff out from behind the glass'. Our conclusions below are based solely on the specific proposals received for each station and the potential impact on passengers.

2. Executive summary

AWC published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 47,871 representations objecting to AWC's proposal and 37 representations supporting AWC's proposal.

AWC proposals include closing all ticket office windows at stations, with staff transitioning to multi-skilled Customer Ambassador roles where they would be available to give advice about the best and cheapest fares as well as supporting customers with accessibility needs. The changes are intended to create a visible and accessible staff presence in stations during staffed hours, on ticket concourses and on platforms.

Transport Focus used information provided by AWC and the issues raised by passengers to analyse proposals. We based our assessment on the impact of the proposals on quality of service for passengers, however we acknowledge that cost

effectiveness is also part of the criteria. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

On 6 September we raised concerns with the proposals and asked a number of clarification questions based on our initial analysis and from the main themes seen in the public responses at that point. AWC's response proposed some enhancements to the original proposal.

Transport Focus acknowledges that AWC has made improvements to its original proposal. Your specific station proposals meet many of the criteria set by Transport Focus around access to products and services. However, we still have a number of industry-wide generic issues which give continued cause for concern. These are specific to all operators and, while we are willing to continue engaging with the industry on these, they have not yet been resolved. As a result we must object to proposals at **all** AWC stations. A full list of stations is provided at the end of this letter.

The main reasons for this are:

- **Queuing standards at Ticket Vending Machines**

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for Ticket Vending Machines (TVMs). This could be based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken.

There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry expectations not be correct.

- **Future regulation**

The public consultation feedback highlighted a widespread concern that if ticket offices are closed and 'schedule 17' regulation no longer applies, there will be no ongoing requirement to consult on any future changes.

Many passengers fear that train companies will make further cuts to staff if existing regulations are removed and even that any mitigations promised, or commitments made, as part of the current consultation could quickly be lost.

We believe an alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

It is clear from the consultation response that members of the public and passengers had serious misgivings with the original proposal. Transport Focus has analysed the proposal and any mitigations designed to address passengers' concerns. The following detailed analysis identifies our remaining concerns and why we have objected to the proposal to close ticket offices.

3. The process

The procedure for making a major change to ticket office opening hours is set out in clause 6-18 of the [Ticketing and Settlement Agreement](#) (TSA). This requires a train company to post details of the change at affected stations and to invite people to send representations to Transport Focus (or to London TravelWatch if the station is based in its operating area). Transport Focus analyses these responses and uses them to help inform its decision on whether to object to the proposals for stations in its operating area.

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the TSA. 13 train companies announced their plans simultaneously, of which 12 had stations in Transport Focus's operating area, the exception being Southeastern.

The consultation process was challenged, especially over whether people (and especially disabled people) had adequate information on which to comment. We note that train companies subsequently made proposals available in alternative formats and published Equality Impact Assessments. We had written to each train company requesting they make this information available. The consultation period was also extended by the train companies to 1 September, giving people longer to respond. Under the terms of the process set out in the TSA a nil response on the part of Transport Focus is deemed to be acceptance of the proposals. Therefore we continued with our role in the process as written.

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

4. Responses to the consultation

During the consultation period we received a total of 585,178 responses by email, webform, freepost and phone. Some were specific to individual stations, some were specific to train companies as a whole and some were at a network-wide level, objecting to the proposals by all train companies. In addition, we also received a total of 257 petitions.

There were two specific campaigns launched which generated a large number of responses; one by the RMT union which involved emails and 'postcards', and another via the workers' rights network, Organise, which was via email. While the majority of these responses followed a standard template some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received 47,871 objections to Avanti West Coast's proposals.

The top three themes in responses were concerns over the ability to buy tickets in future (including difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. The common theme running throughout responses was the role, and value, of staff in delivering all of these.

In addition, we received 93,185 national objections opposing changes across all stations.

We also received many responses from stakeholders including MPs, local authorities and representative organisations.

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More detail can be found in Annex 1.

We also received 37 representations supporting Avanti West Coast's proposal to close ticket offices out of a total of 721 nationally.

It is important to note that these are the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area – it was not a national consultation. Some people sent objections for individual stations, others sent a reply to each train company objecting to all stations in their area.

5. Criteria for assessment

Under clause 6-18 (1) of the TSA changes to opening hours may be made under the Major Change procedure if:

- (a) the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness, and
- (b) members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

Transport Focus may object to a proposal on the grounds that the change does not meet one or both of the criteria above. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State for a decision. The Department for Transport has previously published [guidance](#) setting out the approach the Secretary of State (SofS) would take in these circumstances. This guidance states that the SofS is “content for Transport Focus and the Operator to continue discussing the proposal, including amending it, if that would enable an agreement to be reached. If the matter is referred to the SofS, the SofS will decide whether the objections are valid or not; i.e. the proposed change fails to meet the criteria, or meets the criteria. Alternatively, the procedure permits an arbitrator to be appointed to determine if the criteria are met.”

At the same time the consultation was launched, to provide transparency on our role in the process, Transport Focus published its own [criteria](#) (which contain many of the same themes set out in the Secretary of State’s guidance document). They covered:

- *Passengers can easily buy the right ticket for the journey they want to make.*
This included the product range available at the station, what support is available to advise/help with a purchase and access for people who need to use cash or do not have a smartphone.
- *Passengers requiring assistance to travel receive that assistance in a timely and reliable manner.*
This included arrangements for providing booked assistance (using the Passenger Assist process), assistance provided on a ‘turn-up-and-go’ basis, the support available when buying a ticket and the ease of requesting assistance.
- *Passengers can get the information they require to plan and make a journey, including during periods of disruption.*
This included the information channels available at the station and the support available to help passengers who need assistance.
- *Passengers feel safe at a station.*
This included perceptions of personal security and how train companies will provide reassurance for passengers wanting to travel.
- *Passengers are not penalised if they cannot buy the ticket they require from the station.*

This included arrangements for issuing Penalty Fares or prosecutions for fare evasion.

- *Passengers can continue to use facilities at a station.*

This included access to facilities such as waiting rooms, toilets, lifts and car parking.

Transport Focus made clear it would focus its assessment on the impact of the proposals on quality of service for passengers, however we acknowledge that cost effectiveness is also part of the formal criteria. Transport Focus has not received details on cost effectiveness or cost savings from train companies. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

Our published criteria also highlighted that the presence of staff at a station plays a key role in the railway meeting passengers' expectations in many of these areas, so station staffing would be a key consideration in our assessment.

6. Our assessment

Transport Focus used information provided by train companies and the issues raised by passengers to analyse proposals against the criteria set out above. On 6 September we wrote to each train company raising concerns with the proposals and asking a number of clarification questions based on our initial analysis and from the main themes seen in the public responses at that point. AWC replied on 27 September. These letters are attached as Annex 2 and 3.

AWC's original proposal was to:

- Close all ticket offices at stations AWC manage, and your ticket offices at Network Rail managed stations on the West Coast Main Line where you are the lead retailer, and move staff to other station areas, where they would be better placed to help customers buy tickets and provide travel advice and information.
- A new role of Customer Ambassador would be created for staff moving from the ticket office to the wider station area.
- 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.
- Customer Ambassadors will be available to help with ticket purchase at key hours during the day. These hours are reduced from the current ticket office

opening times and will be provided by fewer staff than who help with ticket purchase at ticket offices today.

- The 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.
- There will be no changes to AWC station staffing hours and stations will continue to be staffed from the first train to last train.
- Tickets that cannot be purchased through TVMs will be available from staff in the station that have access to a Mobile Ticketing issuing System (MTiS) that can provide them.
- TVMs will continue to have the option to pay by cash or card.
- Customer accessibility services will remain unchanged and stations will continue to have staff available to assist customers at the same times as now.
- Changes would be phased.

Following further discussions with Transport Focus AWC have made changes to the original proposals:

- AWC have taken on board the feedback received during the consultation process and have reviewed in detail the daily ticket transaction data, focusing on the hours at each station where there are currently seven transactions or more. As a result of this, AWC now plan to extend the hours of the Customer Ambassador role with specialist ticketing knowledge at a number of stations. (Birmingham International, Coventry, Crewe, Glasgow Central, Lancaster, Macclesfield, Rugby, Runcorn, Stafford, Stockport, Stoke-On-Trent, Warrington Bank Quay and Wigan)
- AWC will increase the number of Customer Ambassadors with specialist ticketing knowledge at Manchester Piccadilly to provide additional reassurance that quality of service will be maintained.

We acknowledge that you have made changes to your original proposal in response to passenger feedback from the consultation, especially by increasing the ticket retailing staffing hours at the above stations. We know from our research that passengers value staff at stations highly for safety and security, information, and advice and help purchasing tickets.

Comments received during the consultation overwhelmingly reinforced this point with concern about availability of staff at the station the most important theme in the responses:

“There won't be anyone to tell me the best route for getting where I need to go when taking my family on days out. Example being I needed to get to

Manchester Museum, and the ticket office gave guidance to the closest station and where I needed to change. It can be scary travelling to new places with small children.”

“Nobody to ask questions to, longer queues for ticket machines, less choice for elderly people who don't have a smartphone to buy a ticket, far more impersonal experience when travelling.”

“A few years ago a member of staff at this station ticket office went way above the call of duty to assist me in getting London. This was very important as I needed to reach out to a friend who was dying. What assurance can you give me and the general public that extra staff will be available at all times to answer questions after the office is closed.”

We will now address each of our criteria points in detail against your proposal.

6a) Passengers can easily buy the right ticket for the journey they want to make

In our letter of 6 September we set out a number of issues arising from passenger submissions to the consultation and our own analysis. It was clear from the consultation that this was a key area of concern for passengers.

Complexity of fares and ticketing

We acknowledge that there is a clear trend towards digital sales and away from sales at the station, and that this is likely to continue. However, a substantial number of people either cannot or have chosen not to move to digital to date.

Some, such as those who are unbanked and/or have no access to digital channels, have little choice but to buy from the station. Others are reluctant to move online – our research shows that this resistance often comes from uncertainty and a lack of confidence, exacerbated by the complexity and variety of ticket options available. This is not only a matter of personal preference, it is often for hard, practical reasons about routing or time restrictions and concern about the consequences of buying the wrong ticket, including potentially paying more than they needed to. Staff support often offers confidence that the most appropriate ticket for the journey has been purchased.

Comments received during the consultation illustrate this point:

“I would be at a loss if you closed Penrith ticket office their help and advice is invaluable. Online tickets are fine up to a point but can be difficult to navigate at times. Nothing beats asking a “real person”!”

“As an older person, with no car, I rely heavily on the railways - and can only foresee enormous difficulties accessing services if ticket offices are removed. I will try and keep my points succinct, many people, including me, cannot manage to buy tickets online: we simply do not have the equipment, know-how or confidence...”

“I believe that this move will be detrimental to the rail customer experience. There have been many occasions when my planned rail journey was not straightforward, and with the complexity of different rail companies and different types of tickets, I could only be confident I had the right ticket for each part of the journey when I purchased it at the ticket office.”

Useability of Ticket Vending Machines

AWC's proposals place a much greater reliance on sales from Ticket Vending Machines (TVMs) than at present.

TVMs clearly have an important role to play in retailing tickets, and we know from our research that many regular users find them quick and easy to use once you know how. However, it is equally clear from our research and the comments received that some passengers still have concerns about using them. TVMs are not physically accessible to all passengers and some people with cognitive disabilities can have difficulties in using them. Others do not find them user-friendly, requiring a degree of prior knowledge of the fares structure which some passengers do not possess. In addition, not all TVMs can offer the same range of products and services as ticket offices.

Even where staff will still be present at the station it will be important that they have sufficient expertise to help passengers navigate the complex fares system. In contrast to many other self-service retail situations, for example a self-checkout at a supermarket, many passengers will need support not just to use the TVM, but also to understand what they should purchase and provide confidence they are getting the best deal.

An increased reliance on TVMs makes it even more important that they are monitored and maintained. This applies to operational resilience and to customer service quality. There are standards for queuing times at ticket offices (three minutes in the off-peak and five minutes in the peak). It is a requirement that these are monitored and reported on. There are no such targets for TVMs.

The useability of TVMs came through strongly in the consultation responses:

“I would find it extremely difficult to use the ticket machines. I used a machine last week for the first time and found it so confusing and bought the wrong ticket which I only realised when the barrier wouldn't open. Luckily the ticket

office was open and they sorted it for me. I found it very stressful so will use the bus if this is introduced.”

“I buy all my tickets at the ticket office. I tried the machines, I don’t understand them and they often have lengthy queues or are out of order.”

“The ticket machines don't work properly, despite being new. The screens don't easily register presses, finding your way to a station is longwinded and laborious, the times shown start not from the next scheduled train but from the next five minute interval of the hour. A simple day return? Forget about it, you must specify train times in a round-the-houses journey of button presses and choices that have, on more than one occasion, made me miss a train. And then there are the times when they take my money but fail to issue a ticket, which has also happened more than once.”

Retail capacity

Closing ticket windows also raises questions of retail capacity at the station – can TVMs cope with an increased level of sales? If not, then there is a risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket.

“I find the complete closure of the ticket office an unjustified change for customers. Crewe is a busy hub, with plenty of passengers, and ticketing arrangements are over-complicated. In these circumstances, travel advice is important and I think its current quality would be a sad loss for railway users like myself.”

“Whenever I need to book train tickets, I have found the staff at Stafford station ticket office very very helpful. On some journeys I can be flexible over the time of the train I am taking, so can ask the staff if there are no Super Off Peak/off peak tickets left on the first train I suggested, what other train times on the same day, still have cheaper tickets available. And if my destination needs 2 or 3 changes - such as when I travel from Stafford to Darlington - I can ask for alternate ways to get there, the staff member will print out the train times/where I change trains, etc.”

“There are three windows at the ticket office. It is rare to see no queue at the ticket office. The question 'Why is this the case?' needs to be answered and published. The ticket machines are prone to breakdowns and are not user friendly. The layout is not the easiest to read. A queuing system will have to be introduced. People who do not have English as their first language will be disadvantaged as will travellers from abroad.”

Cash

Not everyone has a bank account or access to debit/credit cards – some people are reliant on cash to buy tickets. The guidance issued by the Secretary of State specifically mentions the need to take into account accessibility for customers who need to use cash or do not have a smartphone or access to the internet.

Under the existing National Rail Conditions of Travel if you bought your ticket using cash (for example, from a TVM) you are entitled to a refund in cash if your train is cancelled or delayed and you decide not to travel. It is important that this could still be provided in future. Passengers without a bank account also need to be able to receive compensation if their train is delayed. Currently ticket offices offer both these services.

“I use cash to pay for my tickets and the help and advice I get from ticket office staff is irreplaceable....they are vital. Machines and cards should not be the only ways to obtain tickets, just what is wrong with real money these days?”

“I don't like the new ticket machines, they are unhelpful and don't always give you the best deal. Most times you cannot use cash and I won't use online banking or my bank card. You also cannot get help when you need it. This is a backwards step and for people who are vulnerable this doesn't help and should not be allowed to go ahead.”

Product range

Currently ticket offices provide access to a full list of products and services that TVMs do not provide.

“There are a range of products and services available at the ticket office, which may not be available from Ticket Vending Machines (TVMs). This includes refunds, season ticket changes, ranger and rover tickets.”

“Products offered in ticket office outstrip those offered by ticket machines . Again the less able and less well off in society are being penalised for not using technologies.”

Major stations

Responses from passengers on the proposals major stations have highlighted a particular concern about how passengers will still get expert support and advice at particularly busy stations and where passengers perceive that ticket offices are still very well used.

“I mostly understand the need for modernisation, however I am a little stumped as to how Manchester Piccadilly, Euston, Birmingham New St, and Birmingham

Int can be closed. I would understand more if MAN was transferred to Northern, and BHM to LNR/WMT, but to close completely seems unnecessary at the larger/airport stations.”

“I would like to register my disagreement with the closure of Birmingham New Street ticket office. It is the main entry/exit point to the UK’s second city. It caters to tourists and local visitors who are not knowledgeable about the rail network and sells the most appropriate ticket.”

“The media are reporting that the ticket offices at smaller stations will be closed however the ticket offices at large stations will remain open. Yet looking at the proposals the list of ticket offices to close include London Euston. Glasgow Central Manchester Piccadilly and Birmingham new street. These are the biggest and busiest stations on the West Coast main line.”

That this is proposed a Manchester Piccadilly, one of the busiest stations with tourists and others needing help daily? What is going on?”

AWC’s proposals sought to address these points:

- 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.
- 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 AWC see significant remaining capacity at the maximum point of the day. AWC continue to engage with the wider industry regarding supporting the continued transition to digital.
- Booked and un-booked passenger assistance will still be provided. This is not impacted by these proposals. There will be an easily identifiable meeting point including options to call for help at the station which will include accessible seating. In addition, AWC’s Travel Companion service is available.
- Customers will continue be able to buy a ticket with cash at the station.
- Customers will be able to obtain cash refunds at the station in the same way they do today.
- Headcount reduction is reflective of the current level of demand and transactions that are undertaken within the ticket office. Rather than using the existing rosters as the starting point to determine future rosters, the proposed roster has been built based on the recent volume of transactions and demand at the ticket offices.
- AWC intend to provide additional support during a medium-term transition period, where it is expected that a greater volume may require help. Additional support will be provided to promote the move to web and app as well as to support those customers who are using a TVMs for the first time.

- To ensure customers, particularly at the large stations, can get ticketing support, it is not proposed that staff are roaming around the station, although staff will proactively move to help any customers they believe require support. The Customer Ambassadors with specialist ticketing knowledge will be assigned to specific roles. The TVM area will become the focal point for ticketing enquires, much like the ticket office is today, with staff expected to remain visible to support customers.
- There are also industry wide proposals to:
 - remove the requirement for a Photocard when purchasing a Season Ticket. Operators will accept any reasonable alternative form of ID, such as a driving licence, passport, railcard, student ID, alternative entitlement card (senior citizens pass) or national ID card. For customers who do not have access to a suitable alternative form of ID, a Photocard will still be available from remaining Ticket Offices and via post from a contact centre or third party retailer.
 - We are also aware of industry wide proposals for the national concessions for disabled people which could involve people eligible for the concession being provided with a Disabled Persons Railcard instead. We believe that discussions on this need to involve the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people/representative groups. In the meantime, these concessions would still need to be made available to passengers.

We acknowledge that AWC's proposals will still allow passengers at the station to buy/access all tickets and services currently available at the ticket office. This includes people who need to pay by cash.

We also acknowledge that trained retail staff will still be able to assist passengers with their purchase either via the TVM or using the MTIS machine. This was one of the main concerns expressed by passengers during the consultation.

However, we remain concerned with the following:

i) Retail capacity at the station

We have assessed the ticket office sales data you provided (on a confidential basis). From this it appears that that the combination of TVMs and the MTiS machine has the capacity to cope with the volume of sales displaced from ticket office windows. However, we note concerns in the public consultation about queues at TVMs and how long it can take passengers who are not familiar with them or are buying tickets for more complicated journeys.

You state, “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. 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.”

We acknowledge your willingness to monitor queuing times. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queueing at a ticket office.

However, we believe that there is a need for a nationally agreed, and enforceable, queuing time metric for TVMs. This could be based on based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken. There is also a strong argument for putting these results into the public domain, for example in Customer Reports.

There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct.

Conclusion

Objection 1: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

Recommendation 1: That DPTAC, disabled people and representative groups should be involved in any discussions to replace the national concessionary fares for disabled passengers with an alternative product.

ii) Major/Large stations

We remain concerned at the proposals at larger stations where sales volumes and footfall is still high, especially at peak times. We think there is a greater likelihood that the system of Customer Ambassadors will break down as people

crowd around staff at the TVMs or as they are walking somewhere to help another passenger. On raising this matter, we note that AWC propose:

“At the Network Rail Major Stations such as Birmingham New Street and Manchester Piccadilly, there will be a queue system in place for the TVMs. This reflects that Major Stations do often have a higher volume of transactions and therefore have a greater volume of TVMs available to customers.

At smaller stations, physical queue systems or similar 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.”

Customer Ambassadors will have the dual role of helping people use a TVM and to issue a ticket. You state that “Transaction times at TVMs 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. 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.”

We note that 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 the financial year 2023.

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.

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.

We note your assurance (detailed above) that TVMs have sufficient capacity in order to cope with the projected increase in demand arising from closing ticket offices. However, it can be easy to use TVMs for a simple purchase but not for a more complicated journey, especially where there are restrictions on which operator or route you can take. We believe that those transactions could easily take much longer, especially given the people 'displaced' from ticket windows will also potentially be those less familiar with TVMs and how to use them.

We further note the potential lack of any fixed queuing system to get help could easily confuse and frustrate in equal measure – especially for someone new to the railway or a tourist. At major/large stations there are already staff available on the concourse and elsewhere at the station to provide passengers with information, accessibility assistance and other support. We are aware that many other train operators have proposed to retain ticket offices at major stations.

Therefore, we believe there is still a need for a staffed retail point at the following major stations Glasgow Central, Manchester Piccadilly and Birmingham New Street. This equally applies to large stations with significant footfall and ticket sales, Coventry and Preston.

Objection 2: We believe there is still a need for a staffed ticket office at the following stations: Birmingham New Street, Coventry, Glasgow Central, Manchester Piccadilly and Preston.

iii) Retail Staffing hours

The Rail Minister said: “the Secretary of State and I have been clear in our expectation that no stations that are currently staffed will be unstaffed as a result of the reform. I have made the additional point about the hours not changing materially either, with staff still being there to provide assistance and additional support for those who need and want it. That would include advice on tickets and assistance in buying them”.

We note that retail staffing hours have changed at all stations within your proposal. However, we note that AWC have taken on board the feedback received during the consultation process and have reviewed in detail the daily ticket transaction data, focusing on the hours at each station where there are currently seven transactions or more. As a result of this work, you now plan to extend the hours of the Customer Ambassadors with specialist ticketing knowledge at a number of stations. (Birmingham International, Coventry, Crewe, Glasgow Central, Lancaster, Macclesfield, Rugby, Runcorn, Stafford, Stockport, Stoke-On-Trent, Warrington Bank quay, Wigan)

6b) Passengers requiring assistance to travel receive that assistance in a timely and reliable manner

In our letter of 6 September we set out a number of issues arising from passenger submissions to the consultation and our own analysis. This was one of passengers' main concerns during the consultation.

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in providing assistance and support. A significant reduction in staff presence would have an impact on disabled passengers' ability to 'turn up and go'. While in many cases staff on the train would be able to assist passengers on and off the train, they were are to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

These themes came through in the public consultation:

"What provisions will there be for pax's that are blind - They say staff members will be walking around but pax is blind and will not know where the staff members are. PAX knows where to locate a tix office at all stations they use but not staff members. PAX can't purchase tix's online - Staff sometimes advise to purchase online. Impact is pax wont be able to travel."

"As someone with disabilities I rely on passenger assistance at stations, The journeys can involve several changes, some at small stations and I rely on station staff to move from train to train. It's already difficult enough to find journeys I can manage because the number of changes during a journey has increased. Plus the impact of trains being delayed makes rail travel stressful and unappealing."

"I object specifically about proposed changes to Runcorn station, on the grounds that it will make the station and its services inaccessible to my mother-in-law and other older and/or disabled passengers. The ticket office is one of the most vital accessibility features of this station; it impacts everything from her ability to buy tickets and, receive assistance."

In addition to widespread concern in the consultation about a reduction in staffing at stations, passengers were also worried that when stations were staffed they may find it more difficult to find staff. 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.

“I also work as a support worker doing travel training with vulnerable adults. We rely on the helpful staff in the office who help us. No longer having a ticket office will have a big impact on people.”

“I suffer from hearing loss and I rely on the booking office and staff to assist me when travelling. The proposed changes will have a big impact on using the rail network. It is frustrating with the current shortfall in the service, which means I now regularly cancel planned travel. The proposed changes will further reduce my freedom to travel.”

AWC’s proposals state:

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.

Station specific Equality Impact Assessments (EQIA) 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 EQIAs 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 EQIAs are available on the AWC website.

We note that potential locations have been identified at each station for the Passenger assistance meeting points. These will be located close to the main station entrance and TVM, and will include consistent signage, accessible seating and a Help Point.

Conclusion

Recommendation 2: We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of any changes to Passenger Assistance meeting points.

6c) Passengers can get the information they require to plan and make a journey, including during periods of disruption

It is clear from the public consultation that passengers particularly value the information provided by staff at a station. Reducing the hours staff are available or making it harder to find them, would make it harder for passengers to access advice and information from staff.

“The customer service by staff at the ticket office in Wigan North West is exceptional. Many elderly people and those who cannot book their rail tickets online depend on this service. They help me in this way and also by explaining the choice of tickets and enquiries about timetables, cost, assistance getting on or off the train if a relative or friend needs this.”

“I am concerned about how I will be able, when going to the large concourse of Birmingham New Street Station, to locate a Customer Ambassador when I need advice.”

AWC's proposals include:

- Stations will have a permanent staff presence. Therefore, staff will continue to be available at stations to provide information for the same hours as today. If customer requires a printed travel itinerary, this will still be able to be provided.

We acknowledge that all stations will remain staffed from first train to last train as now.

We have raised concerns at the reduction in staffing levels at stations. AWC responded stating *“The proposed AWC Stations headcount reduction is reflective of the current level of demand and transactions that are undertaken within the ticket office. Rather than using the existing rosters as the starting point to determine future rosters, the proposed roster has been built based on the recent volume of transactions and demand at the ticket offices.”*

Conclusion

We are satisfied that staff will be able to provide the same level of journey planning information as now, including during periods of disruption. **No Objection.**

6d) Passengers feel safe at a station

Proposals to reduce or remove staff presence at stations risked making passengers feel less safe at stations than now.

Our research into passenger priorities in 2022* showed that personal security was the highest station-based priority for passengers. While most passengers tell us they are broadly satisfied with their personal security at the station – of those that weren't, the main cause was the antisocial behaviour of other passengers**. This ranged from people putting feet on seats or playing music loudly to drunken/rowdy behaviour

*[Britain's railway: what matters to passengers. Transport Focus, 2022.](#)

** [Passenger perceptions of personal security on the railway. Transport Focus, 2016](#)

Our research also shows that personal security is a higher priority among women and disabled passengers. In 2022 we worked with Transport for the West Midlands to better understand the experiences of women and girls when travelling on public transport^{***}. Our colleagues at London TravelWatch also looked at personal security on London's transport network^{****}. It also found that women and disabled users were more likely to feel unsafe.

^{***}[Experiences of women and girls on transport. Transport Focus, 2022](#)

^{****}[Personal Security on London's Transport Network Recommendations for safer travel. London TravelWatch, 2022](#)

Good lighting, CCTV, clear sightlines, the availability of help points, and a well-maintained environment can all help people feel safer. But it is also clear that passengers still value a visible staff presence across the network. The latter provides reassurance, helping enhance passenger perceptions of personal security and acting as a deterrent to crime and disorder.

AWC's proposals state:

- 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. There is no change to the safety and security measures in place and all stations are staffed from first train to last train.
- The Department for Transport and British Transport Police have agreed that you should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.

Conclusion

We are satisfied that the proposal will not negatively affect passengers' security at the station. **No objection.**

Recommendation 3: There should be no implementation of proposals until the crime and vulnerability audits mentioned above have been completed and any necessary actions have been implemented.

6e) Passengers are not penalised if they cannot buy the ticket they require from the station

In our letter of 6 September we were concerned that relying on TVMs that are not fully accessible, or do not sell the full product range could mean more passengers are unable to buy the ticket they want before they board the train. This could result in people having to buy the 'wrong' ticket or risk being penalised for boarding without a valid ticket.

Your proposals state:

- 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.
- 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.

We acknowledge that the National Rail Conditions of Travel explicitly state that you can board without a valid ticket if:

- "You have a disability and Ticket purchasing arrangements at the station you are departing from are not accessible to you." (clause 6.1.3.3)
- a self-service Ticket machine is not in working order, or will not accept your preferred method of payment (card or cash) (clause 6.1.3.2)

Conclusion

We are satisfied that the proposal should not create any additional risks for passengers (subject to queuing targets being implemented as above). No objection.

6f) Passengers can continue to use facilities at a station

In our letter of 6 September we expressed concern at instances where facilities such as waiting rooms, toilets (including accessible toilets), and lifts could/would be closed because there was no member of staff to open them. We were concerned that any changes to ticket retailing at stations should not result in any reduction in access to key passenger facilities. Station facilities such as waiting rooms, lifts and toilets are important to the customer experience for many passengers, while for some passengers they are an essential in enabling them to travel by train.

Your proposals state:

- 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. There is no change to the safety and security measures in place and all stations are staffed from first train to last train.

Conclusion

We are satisfied that the commitment to maintain original staffed times will mean passenger have the same level of access to station facilities as now. No objection

6g) Other issues

Transport Focus's published [criteria](#) stated that we would also consider any other issues raised by members of the public during the consultation. Two key issues were:

i) Future regulation

The public consultation feedback highlighted a widespread concern that if ticket offices are closed and 'schedule 17' regulation no longer applies, there will be no ongoing requirement to consult on any future changes.

Many passengers fear that train companies will make further cuts to staff if existing regulations are removed and even that any mitigations promised, or commitments made, as part of the current consultation could quickly be lost.

Your letter of 27 September raised the possibility that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) could be used as a form of regulation. The ATP process is:

- formally regulated and enforceable by the ORR as part of an operator's licence.
- It requires operators to have clear measures in place when considering changes to station staffing levels to ensure the continued provision of unbooked assistance for passengers.
- Material changes at a station (which include staffing) must be reported to ORR.
- At the time of submission, operators must confirm that they have sought and considered feedback from local groups such as their passenger panel, accessibility forum and local user groups, as appropriate.
- Should significant or material changes be made to a revised ATP, then ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC), Transport Focus and (where relevant) London TravelWatch.

We think this could be an option but feel that it may require modifications to the ATP guidance. The key requirement for us is a commitment (and process) to consult on specific changes to staffing at a station, at both an individual station level and wider. We also think there is a need to maintain public engagement as well. The value of this can be seen in the current process whereby train companies have responded to passenger feedback – that improvement loop would be lost if there was no mechanism in future.

We believe that there needs to be a commitment/process in place before changes can go ahead.

Conclusion

Objection 3: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

ii) Timing of mitigations

Transport Focus is on record as saying that mitigations need to be in place before the changes come in [[Evidence](#) to the House of Commons Transport Committee hearing – 13 September 2023].

You have advised that 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.

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.

Ultimately, the only change in the ticket issuing systems proposed is the enhancements to the TVM functionality to meet some of the 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.

Other mitigations have also been proposed around Passenger Assistance meeting points and Crime and Vulnerability surveys. We have already set out in the sections above the importance of these being addressed prior to any changes at ticket offices.

There would also be a need for a clear, co-ordinated communication plan surrounding any changes (should they go ahead). This would need to set out what was being done and by when. It is clear from the consultation that passengers feel very strongly about this issue and have a number of concerns that have yet to be publicly addressed. This will be especially important given that proposals have changed since the original consultation – passengers will need to be guided through the improvements and mitigations.

Conclusion

Recommendation 5: It will be essential that there is a clear, co-ordinated communication plan to inform passengers should any changes go ahead.

iii) Monitoring and review

We do not think there has been enough focus in plans on reviewing and monitoring changes should they go ahead. There is a need to assess whether mitigations have been delivered and, crucially, whether passengers feel the new arrangements are working. This would require research with passengers and a series of metrics designed to monitor the impact.

As stated earlier, we think this must include queuing time metrics at TVMs. A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct. This regime must be in place before any changes took place.

Conclusion

Objection 4: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

7. Assessment for each station

Objection 1: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

Objection 2: We believe there is still a need for a staffed retail point at the following stations: Birmingham New Street, Coventry, Glasgow Central, Manchester Piccadilly and Preston.

Objection 3: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

Objection 4: There must be a robust monitoring and review mechanism in place to review any changes. This must include queuing time metrics.

Station	Decision	Grounds for objection (see text above)
Birmingham International	Objection	1, 3, 4
Birmingham New Street	Objection	1, 2, 3, 4
Carlisle	Objection	1, 3, 4
Coventry	Objection	1, 2, 3, 4
Crewe	Objection	1, 3, 4
Glasgow Central	Objection	1, 2, 3, 4
Lancaster	Objection	1, 3, 4
Macclesfield	Objection	1, 3, 4
Manchester Piccadilly	Objection	1, 2, 3, 4
Oxenholme Lake District	Objection	1, 3, 4
Penrith	Objection	1, 3, 4
Preston	Objection	1, 2, 3, 4
Rugby	Objection	1, 3, 4
Runcorn	Objection	1, 3, 4
Stafford	Objection	1, 3, 4
Stockport	Objection	1, 3, 4
Stoke On Trent	Objection	1, 3, 4
Warrington Bank Quay	Objection	1, 3, 4
Wigan North Western	Objection	1, 3, 4.

Transport Focus
31 October 2023

Annex

- 1 - Total objections received for Avanti West Coast
- 2 - Transport Focus's letter of 6 September
- 3 - AWC response to that letter

Annex 1: Total objections received for Avanti West Coast

Station specific objections:

Birmingham International	100
Birmingham New Street	683
Carlisle	1567
Coventry	584
Crewe	862
Glasgow Central	203
Lancaster	2163
Macclesfield	763
Manchester Piccadilly	1259
Oxenholme Lake District	490
Penrith	569
Preston	586
Rugby	787
Runcorn	273
Stafford	1067
Stockport	712
Stoke On Trent	860
Warrington Bank Quay	207
Wigan North Western	205
Total	13,940

In addition to the 13,940 station specific objections listed above Transport Focus also received 33,931 responses objecting to Avanti West Coast's proposals in general.

Total Avanti West Coast objections: 47,871

Transport Focus also received a further 93,185 responses objecting to the proposals nationally which were not attributable to a specific station or train company.

Some responses received by our shared Freepost address and addressed jointly to Transport Focus and London TravelWatch have been counted by both organisations as the objection could apply to stations in both organisations' areas.

The following station specific petitions (with the number of signatures) were also received by Transport Focus in response to Avanti West Coast's proposals:

Birmingham New Street	79
Lancaster	1178

Runcorn	643
Stafford	107.

We received copies of the following online petitions:

Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>

Megaphone - <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices>

We are also aware of the following online petitions:

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

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

We also received a report on a survey from 38 Degrees with 26,194 responses objecting to the changes nationally.