

# Chiltern Railway ticket office consultation feedback responses: 27 September 2023

## Retail facilities

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

It is difficult to estimate the level of migration away from ticket offices since our proposal would mean existing ticket office staff would still retain the ability to sell tickets via our mobile ticketing devices. However, given the natural trend towards increasing digital share in recent years we envisage that trend will continue. We also expect TVMs to see increased usage, having plateaued in recent years. We plan to review the channels by which our customers purchase their fares as part of this change process.

### **Do you have any assessment of how your move to a multi-skilled team at Bicester Village and Oxford Parkway stations has worked? Did this include any programmes designed to help people migrate to digital and if so, how effective have these been?**

"The Bicester Village and Oxford Parkway stations model is working well to provide an efficient service for our customers. Station teams have a good relationship with customers, and where customers are unable to use TVMs, our station teams are at hand to assist with ticket purchase using the MTIS device. All tickets are available for purchase online, TVMs or at stations.

No particular programme is known to have been put in place, however, customers were, and are encouraged to use digital channels including the Chiltern website to purchase advance tickets where possible. The model has enabled passengers to move towards the TVM's for general purposes and allows focus on lengthier services such as season ticket sales. Feedback from regular customers on this route suggest a change in customer behaviour in how they purchase their fares to and from these stations to reflect the channels available such as TVM or online. " To be provided: Data to show sales via MTIS vs TVM/Online, and additional info on the Bicester Village, Oxford Parkway model.

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

"A full Equality & Diversity Impact Assessment has been carried out for each station to ensure those with protected characteristics are not disadvantaged (see our EDIA for reference). There will be customers who do not fall within the protected characteristics that are anxious about moving to digital which is why our proposal to bring our staff into a more physical customer facing position will enable customers to purchase the tickets they want with the assistance to use TVM or other digital means. Our EDIA was published (and was made available in alternative formats) during the public consultation.

Link to our EDIA - <https://www.chilternrailways.co.uk/sites/default/files/2023-07/Complete%20EDIA%20for%20ALL%20CRCL%20Stations.pdf> "

### **How accessible is your app and your website, especially for those with a disability?**

We are currently working towards WCAG 2.1 AA accessibility standards (defines how to make Web content more accessible to people with disabilities, this level is used in most accessibility rules and regulations around the world). The website is 95% complete and

should be fully compliant by the end of this year. We would update our app to be WCAG 2.1 AA compatible subject to funding.

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

We do not anticipate a material impact to revenue; our proposal retains the ability for customers who currently purchase at a ticket office to continue to purchase from a station team member using a mobile ticketing devices.

**Why is the use of MTIS a ‘contingency’ rather than a formal retail channel?**

We encourage customers to buy tickets via TVMs and through online facilities. MTIS will be a supporting device at all stations as they are today, to retail products that we are not able to provide through other retail channels. Currently, when queues are longer than usual at TVMs or ticket offices during occasions such as Wembley events or industrial action, station team members are able to support using MTIS devices to control queues for ticket purchases and collections from TVMs.

**How will people know that they can buy a wider range of tickets if they approach staff and ask?**

We will produce targeted customer communications taking into consideration our current customer insight. We will use all our existing channels to raise awareness of the services and products we provide, and how customers can access them including through our station team members.

**What reassurance/ evidence can you provide that retail arrangements at each station will have sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours and at those stations with a higher than average proportion of sales from the ticket office?**

We are not expecting a higher than average capacity for tickets at our stations as a result of our ticket offices closing. Our customers will continue be able to buy retail products with support from our station team members to use the TVMS. Tickets not available via the MTIS device can be purchased at our stations during trading times as they are today. Subject to funding from DfT, we will be enhancing the software on our TVMs to provide additional functionalities.

**Has any assessment of the TVM capacity at each station has been carried out? 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?**

"We have not needed to carry out additional assessments, as we are retaining MTIS devices at all locations. We are not expecting any significant changes to demand to existing ticket sales. However, we will continue to monitor the sale of tickets from TVMs, and any changes to the reservation of tickets for collection at stations via TVMs

Link to our " Provide additional data on TVMs/MTIS and online sales during the past 2-3 years.

**What assessment have you made of the impact of seasonal peaks, especially at tourist destinations?**

"Our proposals will not reduce hours of coverage at stations and our station team members will still be able to sell tickets via our mobile ticketing devices, as well as supporting

customers using TVMs. It is therefore not envisaged there will be any detrimental impacts during seasonal peaks compared to our current offering. We will carry out regular reviews during seasonal peaks to assess any potential impact.

We are maintaining the same staffing hours as we have today, however, we have assessed the quantity of staff we require to continue to provide the right level of services based on our station data, and we will not be looking to make any reductions that impact on our current offering. "

**Has any assessment of the location of TVMs been carried out – are they in the right place to meet demand?**

We are currently drawing up plans for each station. Consideration will be given to the appropriate location of TVMs to ensure they are situated in the most suitable location at stations for our customers, and our station colleagues to be able to provide assistance subject to funding.

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

Retail provision will remain as they are today. However, we will monitor customer satisfaction and enquiries through our existing channels to ensure retail arrangements remain adequate. Our retail internal audits will continue to support our service provision.

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

All locations will be staffed multi-skilled colleagues who will help with impartial retail obligations. There will be no impact on this as a result of the reform.

**TVM capability and availability**

**"Confirmation on whether the following fares could still be purchased/accessed from the station in future – and whether they will be available via the TVM or only via MTIS: National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)**

- o Boundary Zone add-ons**
- o Staff travel discount**
- o Buying tickets in advance rather than on the day of travel**
- o Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements)**
- o Seat reservations**
- o Changing a booking/tickets**
- o Use of rail vouchers**
- o Use of rail warrants**
- o Ranger and Rover tickets**
- o Car parking**

- o Plus Bus tickets**
- o Ferry connections**
- o Group Save**
- o Off-peak purchases before the off-peak begins**
- o Cycle reservations**
- o Photocards for season tickets**
- o Scholar tickets**
- o Sleeper bookings**
- o CIV tickets for connections with Eurostar international services"**

"We can confirm that the fares listed below can still be purchased/accessed from our stations in future as per our current arrangements.

National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion) - This is available via TVM or MTIS

- o Boundary Zone add-ons Currently only available via MTIS
- o Staff travel discount Currently only available via MTIS
- o Buying tickets in advance rather than on the day of travel TVM or MTIS
- o Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements) TVM or MTIS
- o Seat reservations If accompanied by a ticket sales, both MTIS and TVM. If a res for an existing sale, then via MTIS only.
- o Changing a booking/tickets Only via MTIS
- o Use of rail vouchers Only via MTIS
- o Use of rail warrants Only via MTIS
- o Ranger and Rover tickets Only via MTIS
- o Car parking TVM or MTIS
- o Plus Bus tickets If accompanied by a ticket sale, MTIS and TVM. If an add-on to existing, only via MTIS.
- o Ferry connections Only via MTIS
- o Group Save MTIS or TVM
- o Off-peak purchases before the off-peak begins MTIS or TVM
- o Cycle reservations Only via MTIS
- o Photocards for season tickets Only from a booking office / retail point
- o Scholar tickets N/A - only via our Business Travel service.

- o Sleeper bookings Only via MTIS
- o CIV tickets for connections with Eurostar international services Only via MTIS

In addition to the above fares, sales of Railcards are also fairly high. In 2021/22 we sold in £240k worth of Senior Railcards from our booking offices. With the current proposal to retain MTIS, we will continue to be able to retail Railcards at the retail points."

**Could you confirm which tickets/services would not be available from the station in future?**

All tickets/services would be available at tickets as they are today. When customers are unable to purchase their tickets in advance via digital channels, they will be able to purchase at stations via during trading times via the MTIS device or using TVMs.

**Could you confirm whether the list of tickets above will be available and whether this would be via the TVM or the MTIS (or both)? For example, would an Advance4 Purchase ticket be available from a TVM and/or MTIS etc**

All the tickets listed in column 16 will be available via TVM or an MTIS device.

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

"Yes. Most of the approaches for enhancements to TVMs require engagement with the TVM suppliers and development activity. Initial estimates for the development time required for specific products are being reviewed. In most cases these changes are not planned to be completed until mid- to late-2024, however a number of interim mitigations are proposed to ensure passengers are not disadvantaged. Final plans will be dependent on funding agreements and our contracts with suppliers. "

**How will someone who cannot use a TVM, for example a disabled person, purchase a ticket?**

All tickets will continue to be available for purchase as they are today, with many available online. Our team members will be trained and have access to a mobile ticket machine for any products, if customers are not able to purchase them online or cannot use the self-service ticket machines. In the very small number of cases that a customer is not able to buy the product at their origin station via these mechanisms, we will ensure that the customer is able to board the train and buy on the train or at their destination. This is based on the pre-existing conditions of travel.

**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)?**

Our TVMS have an 'assistance' buttons which are currently inactive, so subject to funding we will seek to enhance our TVMS by enabling the buttons for customers to use. One of the benefits of having colleagues on the concourse is that they will be readily available and close to TVMs to assist with customer enquiries, similar to what supermarkets currently have.

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

We will be looking to explore these enhancements. Our TVMs have the physical capability, however, we currently do not have back office support. To have a video facility, we would need a team of people in an office somewhere to handle the calls. So for this, we would

need the enablement budget as well as the extra team members. We would also need upgraded IT connectivity, as video links require greater bandwidth. Therefore, our ability to offer this will be dependant on funding.

**Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability (i.e. are passengers protected from the weather when queuing, are they hard to see in sunlight)? Do you have any plans to relocate TVMs?**

Our location of our TVMs were assessed as part of the our EDIA carried out before the public consultation. We have identified a number of stations where TVMs may have to be relocated to provide additional security or easier accessibility to customers. In some cases, TVMs will be need to be relocated to protect them from environmental factors.

**We are aware that some groups of disabled passengers are more likely to use cash when purchasing tickets. Are 'cash TVMs' at accessible (step- free) locations in the station?**

"All our stations have TVMs with cash and card facilities, and will continue to do so if the proposals go ahead.

Our stations will have one of the following:

- At least one TVM that accepts cash in an accessible location
- Proposals to have staff with MTIS at accessible locations (cash acceptance capability)
- Agreement to pay at the destination or other locations if unable to pay by cash at time of travel if no step free access."

**What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs? For example, in relation to replenishing consumables, i.e. ticket stock and ink, and repairs to faults.**

SLAs vary - depending on the scenario. Most issues are repaired remotely within 2 hours. For issues that require engineer visits, it may be up to 24 hours. If parts are needed, the time will depend on the part required.

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

"Where we propose to close a Ticket Office, we will continue to provide a reasonable adjustment to ensure that no-one has to queue to purchase a rail product for more than five minutes during times of peak demand or for more than three minutes at any other time (or any shorter period(s) specified in the Passenger's Charter). This will stay in line with the current provisions of the TSA for Regulated Stations.

It is possible that there may be longer queues in the immediate period following implementation, particularly at larger stations. However, there is no intention at this time to introduce new set standards for queue times. This is because of our targeted active promotion of online purchasing and multi-skilled station staff who will have access to existing MTIS devices available at stations to help those passengers who do not, or cannot, switch. We are therefore not expecting TVMs to meet the same demand as ticket offices currently, even during peak periods.

Evidence from previous Ticket Office closures, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed (typically a maximum of

20% increase in usage), this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing."

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

**Can you confirm the statement that: 'the hours of operation where we have a member of staff on the station will remain the same as it is today'?**

Yes, this is the basis of our proposal, the hours of operation where we have a member of staff on the station will remain the same as it is today.

**Are staffing levels sufficient to ensure assistance with ticket purchases can still be offered at busier times alongside other duties? Do you have any evidence to support this?**

Our plans are to deliver the right number of stations teams to be available to offer assistance with ticket purchases at busier times. This is supported by the experience from the stations on a number of our routes (Bicester Village, Oxford Parkway) which currently operate using multi skilled team members at stations.

**What training will multi-functional staff 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? Will this replicate the training given to existing ticket office staff?**

We propose to have multi-skilled colleagues at our stations trained to the same standards as those already in similar roles at our stations; to assist customers and perform essential duties at our stations. All our station staff will be trained to enable them to carry out any duties that they require to do undertake their roles.

**How will people find a staff member 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?**

"We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all our stations following the consultation process. Our station by station plans will establish central points."

**What resilience / contingency have you built into staffing plans to ensure that stations will be staffed as advertised and that 'lost hours' are minimised in future?**

"Our stations will continue to be staffed as they are today, this has been built into our proposals and staffing levels for each station. We currently use General Purpose Relief (GPR) to provide resilience for sick leave, and holidays and will continue to provide the equivalent level of cover."

### **Cash payments**

**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?**

All our TVMs at our stations are able to accept cash. We do not anticipate any issues with an increased use of cash but will review future customer purchasing behaviour and mitigate as appropriate.

**If a person cannot pay by cash what arrangements will exist to enable them to travel, particularly where there are Driver Only Operated services? And will there be clear signage at the station to inform passengers about this?**

"We are currently working across the industry to develop a policy and an effective approach to enabling passengers to travel without a ticket.

Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024. Staff will be issued with relevant instructions to allow passengers to travel without a ticket in certain circumstances.

Until then, NRCoT provides the conditions under which a passenger may travel without a ticket without incurring a penalty fare. Interim policy guidance and training will be issued to ensure that customers are able to travel under Section 6.1 NRCoT when necessary. "

**Can you confirm that people will be able to buy the products listed in column 16 with cash?**

Yes, customers can continue to buy the products listed in column 16 by cash in the same way as they do today, through TVMs and MTIS. MTIS will be used for any 'non standard' sales that cannot be purchased via TVMs.

**Passengers requiring assistance to travel receive in a timely and reliable manner. 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 – e.g. via your existing scheme at Oxford Parkway and Bicester Village?**

We are reviewing our current station staffing levels to ensure we continue to provide the same level of customer service as we do today. This forms part of the discussion we are having in our local consultation. Experience at our stations with multi-skilled colleagues shows us station teams are able to prioritise their duties to assist customer during busier times of the day.

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

"Our current Passenger Assist service will still be in place - customers will be able to request help as they do today.

We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all our stations following the consultation process."

**Can you confirm that there is no change in arrangements for 'turn up and go assistance for disabled passengers?**

"Yes, Passenger Assist services will remain as they are today.

The Passenger Assist service is a netwide service that is available for pre-booked and walk-up customer to receive assistance. This is supported by each operator's Accessible Travel



Policy that sets out the commitments to ensure an accessible railway for all passengers, including for Turn Up and Go.

Link to Assisted Travel Information - <http://www.chilternrailways.co.uk/before-you-travel/Assisted-Travel-Information>

**Passengers, especially disabled passengers, may find it more difficult to find and get help from redeployed staff at stations. How will the central point of the ticket office/window be replicated?**

"We are reviewing this station by station, and will work with our Accessibility Manager to ensure central points at stations are suitable for all those with special travel needs, or those who need a helping hand as identified in our EDIA.

**What mechanisms will exist to monitor instances where assistance is not provided?**

As per current arrangements through our customer relations team, customer complaints handling and feedback from our customers. We take our customer complaints very seriously and monitor the number of complaints we receive per 100,000 journeys. Where a problem with assistance is identified at a station we will work with our station teams to ensure the right level of service is available as per our stations trading hours. Where customers are at a station during trading hours and are unable to get assistance, the proposed central point will be a point of call for help.

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

We are proposing that our stations will have a clearly identified central point. A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a central point will be considered across all types of stations following the consultation process.

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

We are not currently installing new induction loop facilities at stations. However, we are reviewing our stations requirements to help us understand the changes if any, each station will require. The requirements will take into consideration our station by station Equality Impact Assessments.

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

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

"As it is today, via online, social media and customer information.

A central point would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The intention would be to provide information traditionally displayed in the ticket office, including timetable leaflets, accessible travel policies. The

concept of a central point will be considered across all types of stations following the consultation process.

We will also consider for each of our stations to have a visible standardised template poster at appropriate location(s) that clearly states:

- What ticket buying facilities and payment methods are available (via station team members and/or TVM)
- What online facilities can be accessed to buy a ticket there and then on a mobile device
- What is expected of them (depending on whether the station is/is not in a Penalty Fares area and/or whether tickets are sold on train) – reinforcing the buy before you board at all relevant locations
- Where they can find help "

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

Current arrangements will apply. Station teams will have printers to print tickets from the MTIS devices. We are currently able to print journey itineraries for passengers who ask for one. We will continue to provide this service as and when customers require them however, this will be dependant on station teams availability as it is now.

**Will staff have the ability to print journey details for passengers?**

Current arrangements will apply. The printers for the MTIS machines will be able to print journey details if requested.

**Help points at stations**

Are help points at every station and are they in an accessible location? Yes, all stations have Help Points available and they are accessible to customers. We have identified in our business cases a need to upgrade and install additional help points to ensure that there is sufficient availability for those passengers who need this kind of facility.

We are also reviewing our maintenance plans and back office facilities to ensure that these help point systems have near 100% availability. We are also ensuring that these help points are sited within the most accessible part of the station estate. "

**Are there any plans to position help points in concourse areas near ticket offices to avoid people having to walk along platforms or over bridges to summon help?**

This is part of the station by station planning to ascertain if/ or where help or welcome points will be needed at our stations, depending on the size and layout of the station. Any additional changes to our stations to provide new or enhanced help points will be subject to funding

**What are your existing processes and SLAs for monitoring that help points are working and the response time to faults? What future commitments can you give?**

Help points are checked by an independent auditor during every static SQR audit (period of every 4 weeks). If any help point is out of operation, faulty, poor reception etc. it is reported to CRCL who raise a call out with telecoms supplier (line faults) or FM (hardware) attendance is within 24 hours.

### **What are the standards for answering help points – i.e. within how many seconds?**

"Standards relevant are: PRM TSI: 4.4.1, which requires 'Staff should be available to answer calls at all times that services are in operation at the station. Operators must have in place a mechanism to allow passengers to inform them when there are problems, particularly at unstaffed stations. Operators may wish to set this out when providing details of feedback mechanisms.

The SLA for Help Point responses is currently 30 seconds."

### **What are the standards for monitoring how quickly you respond to passengers using the emergency button?**

From a safety perspective: this would be considered as part of the station evacuation or first aid plans, and would only be available during our trading hours. Outside of these hours, fire safety would be managed remotely and with the assistance of emergency services (until our internal on-call processes starts, and we can get our on-call colleagues to attend the location).

### **How will you monitor/report time taken to answer help point calls / proportion not answered?**

Most of our help points are answered by National Rail Enquiries. Additional information to be added - (NRE to provide this data to the business).

### **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?**

This is part of the planning we are putting in place to continue to provide a good customer service, and to continue to provide of customer safety.

### **Is it clear how a disabled passenger would use the help-point when seeking assistance to board - e.g. would they press the information button or are they, as with some train companies, expected to press the emergency button to receive more immediate assistance?**

Whichever button is pressed, the customer should be able to speak to someone who can make the necessary arrangements for their assistance.

### **Issue relating to ensuring passengers are not penalised if they cannot buy the ticket they require from the station**

#### **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? 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?**

"Ticketless travel rules will still be the same, if a pre purchase ticket facility exists. Inspectors will continue to use discretion when customers have issues at TVMs or travel from unstaffed stations or only have cash from a card only machine at a station. We will ensure our teams are fully briefed and kept up to date for machine outages. This includes customers who started their journey via a different TOC. All inspectors have advanced disability training, not all are obvious and we will encourage the JAM card 'just a minute'.

There's work across the industry to develop a policy and an effective approach to enabling passengers to travel without a ticket and not to have to go out of their way to buy a ticket.

Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024. Staff will be issued with relevant instructions to allow passengers to travel without a ticket in certain circumstances, including clarification of travel in Compulsory Ticket Areas (CTAs) to ensure passengers are not unfairly penalised.

NRCOT and the associated Railways (Penalty Fare) Regulations already provides the conditions under which a passenger may travel without a ticket without incurring a penalty fare. Interim policy guidance and training will be issued to ensure that customers are able to travel under Section 6.1 NRCOT when necessary.

In a limited number of cases, operators will offer a 'Permit to Travel' to another location will be issued to allow travel to another station to purchase their product. This should be limited to a small range of products (not for use on the day, complex products). Such products may include in-person purchase of a railcard, annual seasons (if not mandated to digital), and rover and ranger tickets.

For travel on the day or reasonably available tickets, such as weekly seasons, the customer should be handled under existing NRCOT conditions (Section 6.1)"

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

"As part of the implementation planning for Ticket Office closures, we will ensure that all notices and signage within our stations are updated to reflect any changes in policies and processes in a consistent manner. This includes 'wayfinding' signage, and information about travelling without a ticket and the circumstances in which a penalty fare may be incurred. One of our approaches could be to audit each station with a pre-set requirements for gap analysis. We will follow any signage guidance from the industry to avoid inconsistent customer communications "

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

**Can you confirm that all station facilities that are currently provided during ticket office opening hours will remain open during those hours?**

Yes - this is a key component of our proposals. All station facilities that are currently provided during ticket office opening hours will remain open during those hours

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

"All accessible toilets (disabled toilets) should have a red pull cord - we can choose where that alarm rings to.

We are considering options on how this will work in those stations where we may have lone working and also ensure a process is in place so that colleagues are not rushing safety critical duties such as dispatching but also attending to a raised alarm. "

**Issues relating to whether passengers feel safe at the station**

**Have you liaised with the British Transport Police about the impact on staff and passenger security?**

"Yes. We liaise regularly with the BTP during our monthly routine liaison meeting. All changes have been assessed and all impacted locations will undergo a crime and vulnerability assessment.

In addition to this, the Department for Transport (DfT) and British Transport Police (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 and will form part of the decision-making process before any ticket office is closed. "

### **Are any mitigations planned?**

We recognise that antisocial behaviour and verbal assaults are key risks and are planning mitigations to help tackle these. This will include introducing further body worn cameras to our people and providing additional training on de-escalation measures and conflict avoidance.

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

We are currently undertaking a survey for station CCTV, and will use the outcome of the survey to inform any further coverage that is required. Any additional CCTV requirements will be subject to funding.

### **Future changes**

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

A key part of our proposal is that stations will have the same level of staff as they have today.

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

"At present, ticket office opening hours for individual stations are stipulated in Schedule 17 of the Ticketing and Settlement Agreement (TSA). The TSA is an agreement between operators that is a condition of an operator's service contract. Whilst the TSA makes provisions for determining ticket office hours, this does not directly protect staffing levels or cover the hours of station staffing more widely.

The TSA was brought into use in July 1995 following the introduction of operator franchises. At that time the predominate retail channel for rail rickets was via in-person retail at stations – Ticket Offices. Since then, ticket retailing has seen a fundamental shift to digital ticketing and more automated retail, with industry figures now showing that only c. 12% of tickets are now bought in-person at a Ticket Office. The protection to customers' ability to purchase tickets locally provided by the TSA is no longer as relevant given that the majority of customer now purchase online, via an App or at TVMs at stations. The expansion of Pay As You Go (PAYG) schemes including contactless and account-based payment will further erode the requirement for in-person ticket retail.

However, a significant minority of customers, as highlighted by the initial feedback from the consultation exercise, do require assistance when travelling, either to access the services or to understand and purchase the right ticket for their journey.

This represents a shift away from the broad Ticket Office sales provision originally intended to be protected by the TSA to a more targeted support at station for those who require assistance.

Given that shift, the regulation required to protect the services should also be fit for purpose. With the removal of stations from Schedule 17 of the TSA, the regulation on Ticket Office staffing and services will be removed. Any future regulation should not replicate the historical Regulated Station approach of the TSA but should protect those customers most in need of in-person support and assistance. Therefore, to mitigate the concern that this will erode customer protections from future changes, it recommended that additional commitments on station staffing levels be linked to TOC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP).

The ATP already offers better provision for the protection of passenger access to necessary and reasonable support at the station than is contained under the TSA. Unlike the TSA, the ATP is formally regulated and enforceable by the ORR as part of an operator's licence. It covers a range of scenarios to commit TOCs to providing support at stations, the most relevant of which are detailed at Appendix C to this document.

Changes to the ATP are controlled, with the agreement of any new ATP, or change to an existing ATP, to include the provision for involvement of stakeholders regarding the ATP provisions at a local station:

"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."

The ORR guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies by the ORR before any new or amended ATP is approved.

Operators may also choose to consult other stakeholders on their draft but ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC) (or Mobility and Access Committee for Scotland - MACS, as relevant for operators serving locations in Scotland), Transport Focus and (where relevant) London TravelWatch on the draft Accessible Travel Policy documents during the approval process and collate a single set of comments to feed back to the operator."

Furthermore, the ORR guidance states that each TOC must publish ATP on their website and via hard copy at staffed stations, and the ATP must be provided to the ORR, DPTAC and Passenger Bodies."

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

"As is the case today, staffing hours and arrangements are advertised, for example on our websites and wider industry sites.

We have a Passenger's Charter, which is a published guide to the level of service passengers can expect to receive when using their stations and train services. The charter is reviewed annually, including engagement with the Passenger Bodies (Transport Focus and London TravelWatch) and includes a description of all aspects of the expected services a passenger should expect, including purchase of tickets and support at stations.

The production of the charter is a requirement for each operator under their contract with the DfT. It should provide a simple and clear description of the expected services. The Charter ensures that each operator will continue to communicate the services and availability of those services at stations that are no longer Regulated Stations under Schedule 17, as it does today."

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

"As per our proposal, our hours of station operations will remain unchanged.

With the removal of stations from Schedule 17 of the TSA, the regulation on Ticket Office staffing and services will be removed. The intention going forward would not be to replicate the historical regulation of station staffing hours but should protect those customers most in need of in-person support and assistance. Therefore, to mitigate the concern that this will erode customer protections from future changes, it has been recommended that additional commitments on station staffing levels be linked to TOC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP).

The ATP already offers better provision for the protection of passenger access to necessary and reasonable support at the station than is contained under the TSA.

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

Cover for colleague sickness and holidays will be provided as it is today. All our stations have GPRs (will be written in full) to cover colleague sickness and holidays.

## **Timing of mitigations**

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

In many instances, we expect there will be two stages of mitigation. The "Day 1" mitigations (in place for the day a ticket office closes) may be an interim measure to manage the transition until a longer-term solution can be implemented. These longer-term solutions will have already been planned and approved/contracted, in development and are just waiting for delivery. The intention is for the "Day 1" mitigations to act as a full mitigant to any specific issue, and therefore it is not seen as necessary to wait until a longer-term solution is in place before the ticket office closes but would also allow for wider station changes and arrangements that will assist with modernisation and efficiencies.

### **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?**

"There is no reason that Transport Focus should object to any of these proposals as prior to a longer term solution being implemented, there will be an appropriate "Day 1" mitigation in place which will fully mitigate any issues.

These short term mitigations will allow for passengers to buy their tickets in a different way than they do today, either at their origin station, along their route or at their destination, in line with our pledge that passengers will never have to travel out of their way to buy tickets. "

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

"The Rail Delivery Group has agreed in principle with the Department for Transport that funding support for the 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.

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 Department 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 Ticketing and Settlement Agreement (TSA). The Department has not approved any proposal put forward by an Operator and will not do so until consultations are concluded."

The letter also clarifies the Minister's expectations that Train Operating Companies will be refining their proposals as part of this consultation process without restarting the process.

"Train operators have entered into discussions with the passenger bodies to take account of the feedback received through the consultation responses. We expect train operators to work collaboratively with the passenger bodies in the coming weeks, listen to the concerns raised and to refine their proposals accordingly."

"We expect to see operators develop and adapt their proposals where needed in response to points raised in the consultation."

**Liaison with other operators**

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

Through the RDG TOC to TOC consultation process.

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

We do not have any National Rail managed stations.