

# **Chiltern Railways' proposed changes to ticket offices: Transport Focus response**

## **Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement**

### **1. Introduction**

This letter is Transport Focus's formal response to Chiltern's 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**

Chiltern published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 28,063 representations objecting to Chiltern's proposal and 16 representations supporting Chiltern's proposal.

Transport Focus used information provided by Chiltern 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 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. The response proposed some enhancements to the original proposal.

Transport Focus acknowledges that Chiltern has made improvements to its original proposal. Your specific station proposals meet many of the criteria set by Transport Focus around staffing and 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** Chiltern stations. A full list of stations is provided at the end of this letter.

The main reasons for this are:

- Welcome Points

In response to concerns Chiltern proposed that Welcome Points will be developed at stations as an initial focal point that provides any customer who needs support and/or advice a place to start their journey. We think there is merit in this idea but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the Welcome Point and needs assistance and whether induction loops would be fitted.

Welcome Points were not explained as part of the original consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. 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 Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and to gather passenger feedback.

- 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 forecasts 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 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 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 national level, in other words 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 28,063 objections to Chiltern'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 network-wide objections opposing changes across all stations.

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

More detail can be found in Annex 1.

We also received 16 representations supporting Chiltern'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 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. Chiltern replied on 26 September. These letters are attached as Annex 2 and 3.

Chiltern's original proposal was:

- Ticket offices would close with staff transitioning to multi-skilled 'customer help' roles - already in place in parts of the network, such as Bicester Village and Oxford Parkway Stations.
- Tickets that cannot be purchased through self-serve ticket machines will be available from staff in the station that have access to an enhanced mobile device that can provide them.

- Self-service ticket machines will continue to have the option to pay by cash or card.
- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now.
- Security teams will be retained as they are today to keep people safe at stations.
- Ticket offices will be repurposed to provide staff, commercial or community space dependent on the station, subject to investment.
- 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 in over three years.

Following further discussion with Transport Focus your letter of 26 September confirmed and expanded some issues:

- All tickets/services (including Railcards and refunds) would be available at the station as they are today.
- Mobile Ticket Issuing Systems (MTIS) would be used to issue tickets not available from TVMs and in the event of longer than usual queues at TVMs.
- The creation of a clearly identified central point at stations. These would be an initial focal point on entering a station that provides support and/or advice. The concept of a central point will be considered across all stations following the consultation process.
- The experience of operating similar arrangements at Bicester Village and Oxford Parkway stations.

We acknowledge that you will be retaining staff for the same hours as now. 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:

“I think they are vital for so many travellers who don’t have smart phones and also have questions about what ticket to buy.”

“As an older rail traveller I value the personal help given to me by Birmingham Moor Street and Solihull ticket offices. I can access on line facilities at home and do use a smart phone for information. But, I do tire more easily now when completing complicated online processes.”

“Whether the designated staff member sits in a ticket office or at a designated enquiry desk is immaterial- but to have one dedicated member of staff in one location who can be found quickly and easily by all travellers is essential.”

“In particular, when making long distance journeys, such as down to Devon/Cornwall, I find speaking to a dedicated member of staff at the ticket office invaluable. I would not be able to find the same wealth of knowledge from a website or ticket machine, which can be confusing and time consuming.”

We will now address each of our criteria points in detail against your revised 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:

“That’s not even taking into account buying tickets for more complex journeys - for which the machine might not even have the option, or it would be buried behind so many menus as to be effectively so. If it takes 20 minutes to buy your tickets, the train might well have already left the station.”

“I think that tickets are too complicated and confusing, that without ticket office staff it can be very difficult to find the right ticket, never mind buying the cheapest option. There are often added complications about which trains you



can travel on, and whether you can get off earlier than your originally intended stop, etc, and this is much easier to sort out in person.”

“Rail ticketing in the UK, including on Chiltern trains, is ridiculously complicated and requires real people to interpret and advise on options.”

“In our late forties, we don't consider ourselves to be old but we do struggle at times with technology and invariably we have needed to speak with the staff in the ticket office for help ensuring that we buy the correct ticket, particularly when we travel to London and need to travel beyond Marylebone, this can be very confusing to ensure the correct and most cost effective ticket is purchased.”

### *Useability of Ticket Vending Machines*

Chiltern'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 TVMs 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 ticket vending machine, 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:

“The ticket machines are not always intuitive enough either. The other day I had to use one because the ticket office was unable to take credit cards, and it was not at all obvious how to select a super-off peak travel card. (All I was offered was an off-peak travel card. I went to the ticket office who confirmed that super-off peak was indeed available for the next train to London, and I paid cash. If I had used the machine, I would have been overcharged).”

“If you get lucky and find a machine that is in working order, you'll be subjected to a labyrinth interface of menus, accessed via a touchscreen that takes your inputs as mere suggestions (although by the 4th or 5th prod it might decide you're serious).”

“Your ticket machines are not reliable enough and when using them for non standard tickets it actually takes people longer than getting their tickets from the counter. I've witnessed this many times.”

“In the past I have encountered problems when trying to buy tickets from the machine including card machines not working and a ticket not being valid for a return journey from Birmingham (because the train was from a different operator).”

### *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.

Comments received during the consultation included:

*“In my experience the existing design of the machines at Banbury (and other stations) is poor and they are not as intuitive as they should be. They are also prone to being out of order which can lead to queues and, potentially, missed trains.”*

*“We find the ticket machine at the station difficult to use, it is hard to negotiate the pricing and ticket structure and often takes five minutes to get tickets due to false starts etc. How will this work if several people need tickets and all are being held up by someone who is forced to use the machine as they are not tech savvy enough to get tickets on the internet or phone?”*

### *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.

Comments received during the consultation included:

*“Many TVMs do not take cash, or permit a part cash, part card payment. Given that people on lower incomes and older and disabled people are more likely to use cash, these groups stand to be disproportionately affected by ticket office closures and may find it difficult to travel as a result.”*

*“The risk is that these stations not only lose the ticket office, but in the long-run access to all their facilities such as toilets, advice, waiting rooms and ability to pay in cash before boarding.”*

#### *Product range*

Currently ticket offices provide access to a full list of products and services. TVMs do not sell/serve all of these. For example, Chiltern’s TVMs do not sell products such as Railcards, boundary zone add-ons or Ranger/Rover tickets. Nor do they allow you to change tickets/bookings or use rail vouchers refund. At present these are available at the ticket window.

This came through in the public consultation:

*“The current self service ticket machines do not give you access to all the tickets or the discounts with different passes and so it will be harder than just buying it at the office.”*

*“I have had extensive experience of modern technology through my work but I must admit that using the ticket machines to purchase slightly non-standard tickets has proved very difficult and I have had to resort to using the expert ticket office staff. Being able to discuss problems with people who have been trained in this specific area of service makes the travelling experience more pleasurable and encourages people to use the trains.”*

*“Quite recently, wishing to purchase an all day travel card to London on a group ticket option, I could not bring up the option required at the expected price. It was most frustrating. How much more pleasant an experience to be able to speak to a human being and be certain I was getting the best price.”*

*“Ticket vending machines also cannot sell advance tickets, railcards, give refunds, sell monthly or annual season tickets or ranger or rovers. Most of*

*which are products that are important to a new leisure focussed train environment.”*

Your proposals (as revised) sought to address these points:

- All tickets/services would be available at the station as they are today.
- Mobile Ticket Issuing Systems (MTIS) would be used to issue tickets not available from TVMs.
- MTIS machines would be used to ‘queue-bust’ in the event of longer than usual queues at TVMs.
- TVMs:
  - Self-service ticket machines will continue to have the option to pay by cash or card.
  - TVMs have 'assistance' buttons which are currently inactive – subject to funding, you will seek to enhance TVMs by enabling the buttons for customers to use.
  - TVMs will be upgraded to offer enhanced functionality – subject to funding. Changes are not planned to be completed until mid to late 2024.
- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now. This will ensure that retail advice would be available for the same hours as now.
- 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 to offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead.

We acknowledge that Chiltern’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 for the same hours as now, either via the TVM or using the MTIS machine. This was one of the main concerns expressed by passengers during the consultation.

We have assessed the ticket office sales data you provided (on a confidential basis). From this it appears 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, “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.”

We acknowledge your willingness to maintain queuing targets for Chiltern in your Passengers Charter. We agree that this is important. 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 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.

Finally, we note the industry wide initiative 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.

## **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.

## **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.

There were a considerable number of comments about this from the consultation:

*"It further marginalises the elderly, disabled and low income families who either do not possess the skills, confidence, knowledge or technology to make online or ticket machine purchases."*

*"Primarily we are concerned that the closure of ticket offices will make rail networks harder to navigate for those who have disabilities. For example, how will someone with a sight deficiency be able to locate staff at either Dorridge or Solihull?"*

*"Not everyone has access to computers etc . Older people and people with disabilities and learning difficulties still need personal interaction and support . I sometimes need advice on the best choices for travelling and most cost effective price tickets."*

*"Not everyone can use ticket machines, my aging mother has arthritic fingers and cannot understand the machines."*

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.

*“If you are elderly with mobility problems – how are you going to access a Chiltern team member on a busy station?”*

*“Closures will disproportionately affect vulnerable and disabled people, infrequent travellers and anyone who needs help. For example, a blind or sight impaired person is able to locate a ticket office, but how are they supposed to locate a Chiltern Railways employee who could be anywhere in the station and doesn't stay in one designated place?”*

*“In the absence of ticket offices, Chiltern Railways should provide some form of contact ‘hub’ location in stations for passengers to be able to highlight their need for assistance. Although the current proposals would allow station staff to be able to assist, it may be difficult for passengers to find assistance if staff are dealing with other requests in more remote parts of larger stations.”*

*“As a blind person who regularly travels by train and always buys my ticket from the ticket office I'm very concerned about the proposals to close the offices. Not only do I use the office to buy tickets but to meet my essential assistance. I need a fixed point to locate staff I am unable to see staff in the station & if someone did offer assistance how can I be sure they are a member of staff if I can't see them.”*

*“Ticket offices provide much needed services for older people, young people, people who struggle with technology due to dyslexia, autism or dyspraxia, people who might not know exactly where they need to go so can't find the right station on a ticket machine, tourists, people for whom English is a second language and so on. A wide variety of train users! “*

*“If former TO staff are not always located in the in the foyer/Ticket Hall, will there be 'call bell' systems to call them back, if someone needs assistance?”*

Your proposals (as revised) sought to address these points:

- The creation of a clearly identified central point at stations. “These would be an initial focal point on entering a station that provides support and / or advice. 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.”
- During staffed hours this location would have a member/members of staff nearby to offer advice and support.
- You are not currently installing new induction loop facilities at stations but you 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. Following the

assessments, we may relocate existing induction loops if required. At very least, stations with will continue to have their existing facilities...”

- Passenger Assist service will still be in place - customers will be able to request help as they do today.
- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now.

We acknowledge that trained staff will be available to offer support and help to passengers, and that they will be there for the same times as they are now. This should mean assistance is still available on the same basis as now.

At some smaller stations – where ticket office staff are currently the only members of staff present - we also acknowledge that this could result in more physical assistance actually being available – for example in helping with bags or showing people to the platform - in a way that is not always possible while staff are in a ticket office.

We note the concept of the ‘central point’ as a means of creating an alternative focal point at the station. We think there is merit in this idea but that there is much that still needs to be developed in terms of how the new arrangements would work in practice. For example, in how people will find a staff member if they are not at the central point or alert staff they need help, whether an induction loop will be provided, what queuing arrangements will apply if several people want help at the same time, and how visually impaired passengers would know that someone offering to help was a genuine member of staff. It is clear from the consultation that passengers value staff and want clarity and certainty on how they can find them at the station.

We are aware that industry-wide proposals on this are being discussed. However, as it stands there is lack of clarity and detail on this proposal. We sought industry-wide assurances on the following:

- A mechanism for alerting staff that you are at the Welcome Point and need assistance, at each station. It should be clear that this is for all passengers and not just those with a disability.
- A mechanism of informing people that the Welcome Point has shut (for example, to avoid people waiting there after staff have gone home or where the staff member is ill/off work. This happens at a ticket office by virtue of the blind being closed).
- Clarity over what services/support will be provided to passengers (for example would this also function as the meeting point for passengers who have booked Passenger Assistance).
- Whether induction loops would be fitted.

It is an important principle that people affected by a proposal should have a say on that proposal: “nothing about us without us”. Welcome Points were not explained as part of the consultation so passengers have not had the opportunity to comment on



these plans or to highlight potential concerns. To that end 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 these Welcome Points.

The Welcome Point concept is a fundamental change for passengers, especially disabled passengers, so it is important that they work in practice and that passengers have confidence in them. It was clear from the consultation that accessibility, particularly the availability of staff to provide assistance, was a key area of concern. Therefore, we believe they must be piloted/trialled to establish what works best at different types of stations and how passengers react to them. Proposals on ticket offices would need to await the outcome of these pilots.

### **Conclusion**

**Objection 2:** We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

**Objection 3:** We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

## **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.

*“My husband and I have both recently needed to consult a real person about changes required to the tickets we bought using the automatic machine. We both prefer to buy tickets at the ticket office as we get up to date information about works on routes and are confident that we are buying the best value tickets.”*

*“For many people, including myself, the ticket office is not just a place to purchase a ticket, but also an information centre. Staff often provide invaluable, real-time advice on routes, disruptions, and alternatives—something that an app may not be capable of.”*

Your proposals (as revised) stated:

- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now.
- You 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”
- Staff are currently able to print journey itinerates for passengers who ask for one. You will continue to provide this service as and when customers require them, however, this will be dependent on station teams availability as it is now.”

We acknowledge the commitment to maintain the staffing times as they are now. Staff in the new customer help roles will be present for the same times/hours as existing ticket office staff. We believe that this should ensure that passengers have access to journey planning and disruption information as now.

### **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.

We received a number of comments about this in the consultation:

*“Not to mention that loss of ticket offices means less safety around train stations for women, older and younger people as there will be no one around to deter crime, help someone in distress, or provide assistance. Railway ticket offices are more than just a person selling tickets, they help make train stations safer and train travel safe and accessible.”*

*“I am concerned for the safety of disabled passengers and blind and visually impaired passengers will struggle to identify a member of staff.”*

*“On more than one occasion I have been grateful for the presence of ticket office staff including for lost property retrieval (a mobile phone!), directions for travel, help buying complex tickets, and grateful for their presence when intimidating men were in front of the train station entrance.”*

*“There is also a vulnerability for female travellers if there are less staff about particularly in the evenings and later.”*

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.

Your proposals (as revised) stated:

- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now.
- The Department for Transport (DfT) and British Transport Police (BTP) 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.

We acknowledge the commitment to maintain the staffing times as they are now, both in terms of the new customer help role and for dedicated security staff. We believe that this should provide the same level of reassurance to passengers as now. Indeed, in some instances, having more a more visible staff presence (for example, staff out from ticket windows) could improve perceptions of safety. However, it will be important that the risk assessment mentioned above are completed and acted upon before any changes are made.

## **Conclusion**

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

**Recommendation 2** - 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.

This was something commented on in the consultation.

*"The ticket office means that they can travel without worry and without having to purchase tickets on the train and risk being fined."*

*"However, if it was closed, I would end up boarding the train without a ticket because the machine is so badly designed and would then be issued with a penalty fare by the conductor."*

*"Will there be arrangements for passengers to board the train and pay during their journey without fear of penalty?"*

Your proposals (as revised) stated:

- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now.
- All tickets/services would be available at the station as they are today. Mobile Ticket Issuing Systems (MTIS) would be used to issue tickets not available from TVMs.
- As all tickets would be available from the station ticketless travel rules would remain as now. However, 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. You will ensure staff are fully briefed and kept up to date for machine outages. This includes customers who started their journey via a different train company. All inspectors have advanced disability training.

We acknowledge the commitment to maintain staffing times as they are now and to maintain the same range of tickets/services as now. We believe that this should

ensure that passengers have the same opportunity to purchase before they board as they do now. We also acknowledge that ticket inspectors can use their discretion when passengers have issues at TVMs. However, it will be important to monitor queue lengths as set out above.

## **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 a 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.

We received comments on this in the consultation:

*“The risk is that these stations not only lose the ticket office, but in the long-run access to all their facilities such as toilets, advice, waiting rooms and ability to pay in cash before boarding.”*

*“Having staff at a designated place means that they know where to go if they require assistance, information, advice or the unlocking of a facility such as a toilet or waiting room.”*

Your proposals (as revised) stated:

- Stations will continue to be staffed and the hours of operation where there is an existing member of staff, will remain the same as now.
- All station facilities that are currently provided during ticket office opening hours will remain open during those hours.

We acknowledge that facilities at the station will be open/available for the same times as now.

## **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.

Comments received during the consultation included:

*"Will 're-purposed' staff really be available to assist people with ticketing issues? Would expect the proposed closure of ticket offices is really with a view to saving money by reducing staff numbers."*

*"I suspect once the ticket offices go, gradually all staff will go too. That's wrong. We need officials there to help and give us some security."*

*"I appreciate that the suggestion is that this change would free up staff to walk around the station helping customers. I don't believe that this would be likely to happen in anything other than the very short term. Rapidly their numbers would dwindle as staff leave and are not replaced."*

Your letter of 26 September raised the possibility that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – protects those customers most in need of in-person support and assistance. It stated:

- 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 4:** 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].

Your letter of 26 September referred to two stages of mitigation. You stated that, “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.”

The main mitigation in your proposal is the decision to retain the station MTIS machine in order to provide access to all products/services currently available, especially for those who are non-digital and/or cash based. Any future changes to retailing should be conditional on such services being maintained, and on consultation.

Other mitigations have also been proposed around Welcome 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 – see objections 2 and 3 and recommendation 1.

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 3:** Chiltern’s proposed retention of the MTIS machines provides a safety net for those passengers unable to purchase the ticket they need on a TVM or online. Any future changes to retailing should be conditional on this safety net being maintained, and on consultation.

**Recommendation 4:** 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 Ticket Vending Machines. 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 5:** There must be a robust monitoring and review mechanism in place to review any changes. This must include queuing 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 that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

**Objection 3:** We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

**Objection 4:** An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

**Objection 5:** There must be a robust monitoring and review mechanism in place to review any changes. This must include queuing time metrics.

<b>Station</b>	<b>Decision</b>	<b>Grounds for objection (see text above)</b>
Banbury	Objection	1, 2, 3, 4, 5
Birmingham Moor Street	Objection	1, 2, 3, 4, 5
Dorridge	Objection	1, 2, 3, 4, 5
Leamington Spa	Objection	1, 2, 3, 4, 5
Solihull	Objection	1, 2, 3, 4, 5,
Warwick	Objection	1, 2, 3, 7, 5
Warwick Parkway	Objection	1, 2, 3, 4, 5.

**Transport Focus**  
**31 October 2023**

### **Annex**

- 1 - Total objections received for Chiltern
- 2 - Transport Focus's letter of 6 September
- 3 - Chiltern's response to that letter

## Annex 1: Total objections received for Chiltern

Station specific objections:

Banbury	499
Birmingham Moor Street	103
Dorridge	66
Leamington Spa	891
Solihull	125
Warwick	137
Warwick Parkway	102
Total	1923.

In addition to the 1,923 station specific objections listed above Transport Focus also received 26,140 responses objecting to Chiltern's proposals in general.

Total Chiltern objections: 28,063

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 Chiltern's proposals:

Dorridge	61
Leamington Spa	207
Solihull	243.

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.