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Dear Robert,

Ticket offices: emerging issues and clarification questions

Thank you for your letter dated 6 September 2023 regarding emerging issues and clarification questions relating to the Stations & Retail Consultation.

Following feedback from Transport Focus and London Travelwatch, and the Rail Minister's 11 September letter to the Transport Select Committee, we have adjusted our proposals to reflect the principle that there will be no change in the hours that stations are staffed as a result of ticket offices closure.

Adopting this principle does not change the proposals for large or medium stations. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance, advice on the best and cheapest fares, and support customers with accessibility needs.

We have reflected this change in the proposals in our responses to your questions which can be found below.

We remain fully committed to supporting the consultation process with the aim of creating a sustainable railway for the future and look forward to receiving your formal feedback on the consultation.

Kind regards,

Will Rogers
Managing Director
East Midlands Railway

Clarification Questions Raised by Transport Focus & East Midlands Railway Responses

Issues relating to whether Customers can easily buy the right ticket for the journey they want to make:

Adequacy of retail facilities

- 1 What assumptions has EMR made about how many / what proportion of people will move to digital if ticket offices are closed?

"Compared to before the pandemic, EMR has already seen a significant decline in the proportion of customers choosing to use ticket offices. At stations with an EMR ticket office, the proportion of tickets issued at ticket offices has declined from 16.1% in the 18/19 financial year to 5.6% in the current year to date. The majority of this decline has been driven by customer migration to digital channels.

EMR predict that this migration will continue in future but is committed to ensuring that suitable and accessible purchasing options are available for those customers who cannot or would prefer not to utilise digital retailing options."

- 2 Does EMR have any existing programmes designed to help people migrate to digital and if so, how effective have these been?

Along with the wider rail industry, EMR has made significant investment in recent years to enable and encourage customers to switch to digital, both for their ticket purchase and ticket fulfilment. Providing digital ticketing capabilities which meet the expectations and requirements of our customers remains a priority for EMR and there are programmes progressing, both in EMR and at an industry level, to continue the migration to digital. At stations with an EMR ticket office, the proportion of customers using a digital channel (website or app) to purchase their ticket has risen from 39.8% in the 18/19 financial year to 63.1% in the current year to date. This highlights that past initiatives have been highly effective in enabling customers to transition to digital channels. Evidence from TOCs within the Transport UK Group shows that customer transitions towards TVMs and digital rise swiftly when the traditional retail window is removed. (Bury St Edmunds), 39% of tickets were retailed through the ticket office window during RP4 2023, following the closure of the traditional office this dropped to 6% in RP 5 2023, this had further reduced to only 2% of retail sales in RP5 2024. Colleagues will be on hand in our stations to support customers during the transition period, assisting and demonstrating; our customer information centres are also located at key interchange locations around the EMR network.

- 3 Have you made any assessment of who will not / cannot move to digital and the effect on them of closing the ticket office?

"Yes, we have completed Equality Impact Assessments for all stations that are in scope for ticket office closure on our network to assess the impact against people with protected characteristics (defined by the Equality Act 2010). Research into digital exclusion (e.g. Office of National Statistics - 'Exploring the UK's digital divide' - March 2019) reveals that whilst the number of non-internet users has been declining over the last decade, there remains a proportion of people who cannot or will not move to digital. We know that older citizens and those with a disability are more likely to be amongst those groups. The EqIAs consider this and set out the following in mitigation:

Proposed on site, static, rostered staffing is aligned with periods of peak customer demand to support customers who may need assistance to buy a ticket. Outside of static hours, there are ticket machines at every station that conform to DfT's 'Design Standards for Accessible

Stations'. In addition, our Accessible Travel Policy commits to customers being able to board a train without a ticket if the ticket machine is inaccessible to them. Customers can then buy a ticket onboard (if available) or at their destination station without a penalty. This is an ORR requirement. This is also referenced as an acceptable mitigation in the National Technical Specification Notice – Persons with Reduced Mobility (January 2021) (Section 4.4.1 – Infrastructure Subsystem) and the National Rail Conditions of Travel (6.1.3.3).

Following feedback from Transport Focus to the Transport Select Committee, EMR has adjusted our proposals to reflect the principle that there will be no change in the hours that stations are staffed as a result of ticket offices closures.

Adopting this principle, and in line with our July position, this does not change the proposals for large stations. There will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance, advice on the best and cheapest fares, and support customers with accessibility needs.

Please refer to Appendix A for an overview of the revised staffing provisions.

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

"EMR does not envisage any negative impact on revenue as a result of the proposals. Alternative options for purchasing tickets will remain available, including on-board retailing, to ensure that customers are able to purchase tickets for travel. Our existing revenue protection measures will continue to combat fraudulent travel on the network to prevent loss of revenue for EMR and the industry.

EMR would suggest Transport Focus consult with RDG for a consistent industry view, or separately with DfT, in regard to the national level impact associated with this reform proposal.

Due to the confidential nature of commercially sensitive information, it is not possible to share actual numbers. However, we believe that by making staff more accessible to customers at the stations and with the introduction of concepts such as "Welcome Points", continued improvement to services such as Customer Assist and easier digital ticketing, we can encourage more people to use the railway on a more regular basis. The cost of delivering an effective service is also a key consideration in light of the most recent National Rail Customer Survey (NRPS) conclusions. The survey highlighted that the proportion of journeys rated as satisfactory by customers regarding value for money for the price of their ticket nationally was 47%. Any cost savings made through the redeployment of staff and closure of ticket offices will ensure better value for money for the taxpayer and customers.

Across the industry we continue to explore alternative channels for ticket retailing, but making all ticket types universally available on all channels is likely to drive up the costs of running the railway. Therefore, a strategic approach to this will represent better value for money."

- 5 Do you plan to issue station staff with handheld ticket machines so they can still offer direct face to face retailing to those that need this support to access the full range of tickets?

"There are no plans to issue station staff with handheld ticket machines. Noting EMR's handheld ticket machines do not offer the full range of tickets.

Support will be provided to customers in accessing the full range of tickets types by colleagues at the station. Our multi-skilled colleagues will advise customers on how a full range of tickets can be purchased via on line channels, a ticket machine, the train guard, telesales or at Customer Information Centres.

We have set out the intentions for the retailing of different products. The industry has already identified that 99% of products sold at ticket offices today can be obtained from a TVM or online.

Where time is required to implement changes due to TVM upgrades or other process changes interim solutions may be necessary and follow a standard hierarchy of mitigation:

1. Direct online (website or App) - Remote from station.
2. Contact centre (or Travel Agent / Travel Centre) - Remote from station.
3. TVM - At station.
4. MTIS (On Board).
5. Customer Information Centre - Remote from Station

The overall mitigation approach is predicated on a 'Digital First' approach to ticketing, with the promotion and use of digital ticketing and services as the primary retail channel. We do recognise however that a number of EMR's customers are digitally excluded, and for them, we have ensured the other channels as set out in the hierarchy are available.

In the very small number of cases that a customer is not able to buy the product at their origin station via these mechanisms, EMR is ensuring that the customer is able to board and buy their ticket on the train or at their destination. This is based on the preexisting conditions of travel. Customers who are unable to purchase a ticket at the station due to the desire to pay in cash will be able to board the service and purchase their ticket from the on board colleague or at their destination station.

All colleagues on the EMR network are also provided with mobile devices (phones) which support in assisting customers with journey information.

Annex B shows the number of tickets sold at each location across our network including a breakdown of cash v card transactions."

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

Yes, EMR has taken the busiest hours of ticket sales during the six-week period of data provided from the ticket office and the ticket machine (assuming a 15% conversion to on line or digital channels). The data has shown that at all locations where a TVM is present there is sufficient capacity for this to absorb any transactions. It is noted that no TVM is present at Oakham and Narborough and as part of our mitigations. EMR will install a Camax Smart Kiosk at these locations, these kiosks retail the same range of fares as a TVM with the addition of Advance Purchase on the day. Customers who are unable to purchase a ticket at the station due to the desire to pay in cash will be able to board the service and purchase their ticket from the on board colleague or at their destination station. "

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

EMR has taken the busiest hours of ticket sales during the six-week period of data provided from the ticket office and the ticket machine (assuming a 15% conversion to on line or digital channels) and the data has shown that at all locations where a TVM is present there is sufficient capacity for this to absorb any transactions. It is noted that no TVM is present at Oakham and Narborough and as part of our mitigations EMR will install a Camax Smart Kiosk at these locations, these kiosks retail the same range of fares as a TVM with the addition of Advance Purchase on the day. Appendix C shows the volume of ticket office sales vs TVM sales at all location affected by our proposals."

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

"Customers travelling to tourist destinations predominantly purchase either day or period return tickets from the stations that they commence their journeys from; we do not expect any additional burden to be placed on ticket machines at destination locations. The key seasonal peak for EMR is the Summer season in Skegness, due to the logistics of the spike in demand and the restrictions on fleet capacity EMR encourage all customers to pre-book allowing demand to be spread throughout the day. Due to long term colleague absence Skegness ticket office has been closed throughout the Summer Season 2023, the TVMs at the location have been able to cope with the demand placed on them throughout the season . Appendix D shows the Customer Satisfaction data from Summer 2023; with record NPS and over satisfaction scores.

EMR has taken the busiest hours of ticket sales during the six-week period of data provided from the ticket office and the ticket machine (assuming a 15% conversion to on line or digital channels) and the data has shown that at all locations where a TVM is present there is sufficient capacity for this to absorb any transactions (see Appendix C)

EMR has assessed the tourist routes and as part of our EqIA data, EMR has reviewed the demographic data and understand what seasonal trends EMR may have.

Skegness Summer is a particularly busy period for EMR, but this is largely driven by footfall and customer luggage assistance rather than ticket purchases. EMR's seasonal operations will continue to be supported by a mixture of fixed-term contract directly engaged colleagues and agency provision to ensure a smooth operation.

Other seasonal trends are EMR's large university stations, such as Loughborough and Nottingham, colleagues will be available at Nottingham throughout the operational day and at Loughborough between 06:00-23:00."

9 Has any assessment of the location of ticket machines been carried out - are they in the right place to meet demand? Are they easily accessible for all Customers?

"EMR ticket machines are located in optimal positions on stations so customers can easily find them using clear wayfinding signage. Ticket machines are located in accessible positions and take into account the peak demand at the station. Further considerations such as sun glare, visibility from a safety and security perspective and the requirements for shelters are also taken into account.

In 2021, all TVMs and Smart Kiosks were surveyed to ensure that wheelchair users and people of small stature could physically access the functionality of the machines."

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

"There are no plans to issue station staff with handheld ticket machines. Support will be provided to customers by colleagues at the stations encouraging the use of online ticket buying facilities or by providing support at a ticket machine. The multi-skilled colleague will be able to quickly assist customers who need help at the ticket machine during busy times reducing any queues that may occur. EMR is committed to assisting its customers during the channel shift from ticket office to alternate retail methods, EMR expect a significant proportion of customers to transition to digital methods - leading to limited additional demand for the existing TVMs at Stations. Customers collecting a Smart product can do this via the validators installed on stations or by using the EMR Mobile App.

EMR will be holding a series of 'Try the Train Days' which include short learning sessions on TVMs which will increase the confidence in the full customer experience.

There will be a customer comms plan that will explain how to use TVMs. These will include:

- A video and audio step-by-step guide on how to use a TVM (buying and collecting tickets)
- Customers will be able to access the video via a QR code positioned on the TVM
- A paper-based guide on how to use a TVM will be available at stations

EMR has taken the busiest hours of ticket sales during the six-week period of data provided from the ticket office and the ticket machine (assuming a 15% conversion to on line or digital channels) and the data has shown that at all locations where a TVM is present there is sufficient capacity for this to absorb any transactions"

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

"Feedback will be actively sought from colleagues on any buildup of queues. Local and senior managers are across the network at busier times of the day and will also be observing practices as part of their roles.

The Ticketing and Staffing section of the Service Quality Regime (SQR) also includes specific criteria relating to the availability and full functionality of ticket vending facilities, help points and colleague presence (where it is expected to be). The results of these third party audits are reportable to customers via the website on a periodic basis.

EMR post travel surveys are sent to all customers who purchase tickets through EMR directly, customers can also access the survey through the EMR website or by scanning a QR code in stations or on board services. This survey (with a mixture of quantitative and qualitative questions) includes a specific section on the retailing proposition at the station. The results and the verbatim feedback from this survey is regularly reviewed and analysed by the Customer Experience Team before being discussed internally with colleagues throughout the business on a periodic basis. This survey allows for EMR to understand any specific issues (as well as more general trends) relating to customer satisfaction right across the network and ensure we are responding to these. (Appendix E shows an example of the feedback provided via the post travel survey)"

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

"There is no impact on EMR's impartial retail obligations. As set out in the Ticketing & Settlement Agreement EMR will continue, as we do today, to comply to the impartiality obligation on all our retail channels.

EMR's ticket machines currently offer tickets for all available routes and our multi-skilled colleagues, if required, will be available to ensure a customer purchases the required ticket for their journey based on their individual choices and needs.

If a customer is purchasing a ticket online the available journey times, prices and operator are all displayed, so they have all the options available to make their choice.

Usability, functionality and accessibility of Ticket Vending Machines (ticket machines)

13 We would also ask whether any of the following can be provided from a TVM:

13A "National concessions for disabled people (for wheelchair and visually impaired Customers 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 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"

Question 13a: Can the following be provided from a TVM:

The following ticket types are available from EMR TVMs:

Buying tickets in advance rather than on the day of travel

Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements)

PlusBus Tickets are available from TVMs

Scholar tickets - these are only issued centrally online through the EMR Business Travel Services department. They are not issued currently through the ticket office.

The following ticket types are not available from EMR TVMs:

National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion) "EMR is currently working with the industry to develop a policy and an effective approach for facilitating Special Disabled Fares (SDF) The intention is to provide those passengers meeting the SDF eligibility criteria with a Disabled Persons Railcard (DPRC). They will be able to purchase discounted tickets from an increased number of retail channels and across a broader range of ticket types, for example, ticket machines and online channels, making them much more accessible.

This will require changes to policy, backend systems and all retail systems as currently the SDF is only available at Ticket Offices. Subject to finalising the relevant funding agreements and assessments, these changes could be fully implemented by mid-2024.

Until then, passengers will be able to purchase their tickets through

- MobileTIS (On-Board)
- Customer Information Centres / Retained Ticket Offices " "
- On board from a Guard
- EMR Customer Information Centres"

Boundary Zone add-ons "We are currently working with the industry to develop an effective approach to facilitate the payment of Boundary Zone Fares through all TVMs, MobileTIS and online channels. Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024.

Until then, passengers will be able to purchase their tickets through

- MobileTIS (On-Board)
- Customer Information Centres / Retained Ticket Offices " "
- On board from a Guard
- EMR Customer Information Centres"

Staff Travel Discount The Retail Mitigations Group are currently exploring avenues to progress solutions to retail this product. Rail staff can take advantage of an existing online

portal in order to purchase privilege rate tickets through RSTL. " - On board from a Guard

- EMR Customer Information Centres"

Seat reservations The intention is to enable seat reservations, at the time of ticket purchase and also later, through all ticket machines. Subject to finalising the relevant funding agreements, these changes could be fully implemented by mid-2024. "

- EMR website

- EMR mobile app

- EMR Contact Centre

- EMR Customer Information Centre"

Changing a booking/tickets "EMR is currently working with the industry to develop a policy and an effective approach for changing a booking or tickets purchased via ticket machines. The intention is for all TOCs to enable changes via their online channels. In addition, it may be possible to offer these changes via the ticket machine using a ticket machine in 'Staff Mode'.

Subject to finalising the relevant agreements, the intention is to have these processes in place by mid-2024." "

- EMR website*

- EMR mobile app*

- EMR Contact Centre

- On board from a the Guard*

- EMR Customer Information Centre

*if bought through that retail channel"

Use of rail vouchers "EMR is currently working with RDG and the Industry to develop a policy and an effective approach for Rail Travel Vouchers (RTV). The intention is for EMR to continue to prioritise the use of BACS, refunds to credit and debit cards and other automated payment methods such as PayPal.

RTV will still be available for issue, should a customer insist on it, but customers will be advised about the benefits of using other methods of payment. Subject to finalising the relevant agreements, the intention is to have these processes in place by mid-2024.

The adoption of this policy change will require updates to existing retail channels and facilities, including WebTIS and retained Ticket Offices / Customer Information Centres / Travel Centres, or via Contact Centres. All TOC frontline staff will be briefed on the new policy regarding RTVs. All TOC customer relations staff will be briefed on the new policy regarding RTVs. " "RTVs will continue be accepted:

- On board Guards

- EMR Customer Information Centres"

Use of rail warrants "EMR is currently working with RDG and the industry to develop an effective approach to issuing warrants, specifically moving this to online, removing the need for warrants to be exchanged at stations.

Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024." "Rail warrants will continue to be exchanged:

- On board from a Guard
- EMR Customer Information Centre"

Ranger and Rover tickets "The intention is for Rovers and Rangers tickets to be available through all EMR TVMs and mobile TIS.

Subject to finalising the relevant funding agreements and assessments, the intention is to have these processes in place by mid-2024." "

- On board from a Guard
- EMR Customer Information Centres"

Ferry connections "EMR is working with the industry to develop a policy and effective approach for ferry connections.

Noting none of this ticket type were sold through an EMR ticket office during the periodical data provided. (Atkins Annex B)" "

- EMR website
- EMR mobile app
- EMR Contact Centre
- EMR Customer Information Centre"

GroupSave "The intention is for Group Save Discounts to be available through all TVMs and Mobile TIS devices.

Subject to finalising the relevant funding agreements and assessments, the intention is to have these processes in place by mid-2024." "

- EMR website
- EMR mobile app
- EMR Contact Centre
- EMR Customer Information Centre"

Off-peak purchases before the off-peak begins The intention is to ensure that all Ticket Vending Machines (TVM) and MobileTIS can retail and issue off-peak tickets before the off-peak begins. Subject to finalising the relevant funding agreements and assessments, the intention is to have these processes in place by mid-2024. "

- EMR website
- EMR mobile app
- EMR Contact Centre
- EMR Customer Information Centre"

Cycle reservations Given that the priority is to explore the possibility of upgrading ticket machines to accommodate those products greatest in demand, and taking into account relevant costings, cycle reservations are not being explored as part of the Ticket Vending Machine upgrades at this time. "

- EMR website
- EMR mobile app
- EMR Contact Centre
- EMR Customer Information Centre"

Photocards for season tickets "The industry has agreed the policy to remove the requirement for a Photocard when purchasing a Season Ticket.

Where a form of ID is required for the purchase of a Season Ticket, any reasonable alternative form of ID shall be accepted.

Subject to finalising the relevant funding agreements and assessments, the intention is to have these processes in place by mid-2024. Until this time, it is the intention that customers with no photocard will be able to enter a generic number into retail systems.

The adoption of this revised policy is already allowed for under NRCoT and the TSA and will greatly simplify and streamline the Season Ticket retail process. It will remove the requirement for the use of rail industry specific ID that is cumbersome and requires either face-to-face interaction or issue by post, and allows for the adoption of more flexible, digital alternatives.

A reasonable alternative form of ID may include a driving licence, passport, railcard, or national ID card. A rail issued Photocard may continue to be used where they are available.

Where age verification is required, such as for child ticket purchase, similar reasonable alternative IDs will be accepted, such as full-time education IDs. Some TOCs (for example c2c) already have a process for managing and issuing smartcards to children, and it is proposed that other TOCs adopt a similar process/list of acceptable forms of ID for children.

The adoption of this policy change will require updates to existing retail channels and facilities, including TVMs, MobileTIS, WebTIS and retained Ticket Offices / Customer Information Centres / Travel Centres, or via Contact Centres (telesales functionality).

All TOC frontline staff will be briefed on the new policy regarding Photocards, to include the agreed list of acceptable forms of ID. All TOC customer relations staff who deal with Season Ticket aftersales support issues will be briefed on the new policy regarding Photocards. For customers who have purchased a Season Ticket product fulfilled to CCST and without a Photocard, customers should be identified in the Goldstar database by surname, address, and where available email address." Customers without a photocard will be able to enter a generic number into retail systems.

Sleeper bookings Given the limited need for ticket machines across the industry to retail sleeper bookings, these are not being explored as part of the TVM upgrades at this time. "

- EMR website
- EMR mobile app
- EMR Contact Centre

- EMR Customer Information Centre"

CIV Tickets for Connections with Eurostar International Services Given the limited need for ticket machines across the industry to retail CIV tickets, these are not being explored as part of the TVM upgrades at this time. "

- EMR Contact Centre

- EMR Customer Information Centre"

14 Are there any other products, not mentioned in the list above, that Customers will no longer be able to easily purchase from the station if the ticket office is closed?

"Park and Ride, Standard and First Plus Parking, EMR Group Save and Small Group Fares and the option to purchase Railcards.

EMR is currently reviewing a range of products and services that could be impacted by the ticket office closures, including many of those listed.

The capability of TVMs varies by supplier and model. Not all products and services are required at all locations either due to demand or applicability. For example, the retail of Boundary Zone fares would not reasonably be required for TVMs outside of the London zone.

Some of these are already available at all TVMs. Where they are not, EMR is working across industry, exploring the possibility of including these as part of the TVM upgrades discussions, and correctly prioritising based on our understanding of current demand levels, the time for TVM development and relevant costings.

Where there are staff at the station with handheld devices, they will also be able to retail products, including those listed, to customers. Should a customer not be able to buy the correct ticket at the station, the customer is able to board the train (in line with current National Rail Conditions of Travel – NRCOT) and purchase at the first available opportunity.

EMR is currently working across industry to develop an effective process to facilitate the retailing of car park tickets and other sundry sales through TVMs and Mobile TIS (although it is important to reference that EMR do not propose to make use of Mobile TIS) "

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

"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 has been set out (see annex A).

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 customers are not disadvantaged, for example, colleagues will be accessible within the station area to support the purchase of tickets from TVMs.

Final plans will be dependent on funding agreements and supplier contracts. "

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

"Colleagues would undertake a new, more flexible 'multi-skilled customer' role, we see it as 'breaking down the glass barrier' and providing a more personal service where the colleague can take the customer to the TVM and support the customer in purchasing the ticket - while at the same give them more confidence to use the machine the next time they travel. They would be providing advice about the best and cheapest fares, and supporting customers with other queries and accessibility needs, rather than being confined to the ticket office.

There are no plans to issue station staff with handheld ticket machines. Noting our handheld ticket machines do not offer the full range of tickets.

Support will be provided to customers in accessing the full range of tickets types by colleagues at the station. Our multi-skilled colleagues will advise customers on how a full range of tickets can be purchased through online channels, via a ticket machine, via the train guard, via telesales or at Customer Information Centers.

All colleagues on the EMR network are also provided with mobile devices (phones) which support in assisting customers."

17 How will Customers access these products and services in future?

"EMR has set out the intentions for the retailing of different products. The industry has already identified that 99% of products sold at ticket offices today can be obtained from a TVM or online.

Where time is required to implement changes due to TVM upgrades or other process changes, to facilitate earlier implementation of the proposals, interim solutions may be necessary and follow a standard hierarchy of mitigation:

1. Direct online (website or App) - Remote from station.
2. Contact centre (or Travel Agent / Travel Centre) - Remote from station.
3. TVM - At station.
4. MTIS On Board
5. Customer Information Centre - Remote from station

The overall mitigation approach is predicated on a 'Digital First' approach to ticketing, with the promotion and use of digital ticketing and services as the primary retail channel. EMR do recognise however that a number of our customers are digitally excluded, and for them, we have ensured the other channels as set out in the hierarchy are available.

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 are ensuring that the customer is able to board and buy on the train or at their destination. This is based on the preexisting conditions of travel.

EMRs proposals cover the closure of 23 ticket office locations, 21 of these currently have a TVM with the facility to accept cash/card transactions and we plan to install facilities at the 2 locations without as part of the retail mitigations plan."

18 How can Customers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets.

"EMR has no plans to withdraw any of the product range that it currently offers. This is evidenced by the positive steps being taken to provide alternative purchase channels for that very small proportions of products that are currently not available on ticket machines.

EMR seeks to match its product set to the market and where demand exists and is continually monitoring its product offering and associated demand. EMR would not be able to remove any product without prior approval from the DfT.

The industry may be simplifying processes, such as removing photocard requirements for season tickets, but withdrawal of products would require a full and formal review of the ticketing and fares system. This is not within the remit of this consultation or these proposals."

19 How will disabled people who cannot use a TVM purchase a ticket?

"In 2021, all TVMs and Smart Kiosks were surveyed to ensure that wheelchair users and people of small stature could physically access the functionality of the machines.

The EMR Accessible Travel Policy commits to selling tickets accurately and impartially and to provide customers with accurate information and advice on journey and ticket options, irrespective of which train operating company provides the service.

If a customer is unable to use a TVM and unable to buy a ticket before they board an EMR train, they can buy one without penalty on the train or at their destination station. The customer will still be able to use a Disabled Persons Railcard (or any other valid railcard) and/or receive relevant discounts. This policy is on the EMR website and is approved under the EMR licence agreement from the Office of Road and Rail.

The National Rail Conditions of Travel regulations, section 6, provides the conditions under which a passenger may travel without a ticket and not incur a penalty fare notice. Section 6.1.3.3, states: 'if a customer has a disability and the ticket purchasing arrangements at the station you are departing from are not accessible to you, you do not require a ticket prior to boarding the train.'

The EMR's Customer Service Centre can sell tickets to customers over the phone (7am - 7pm) and book passenger assistance at the same time. Tickets can be provided electronically through print at home or be posted out as a paper ticket or printed out by a member of the on-train team.

All EMR staff receive Enhanced Disability Training. This training includes why it is essential to make reasonable adjustments for customers. Training outcomes also support communication and the importance of language and dignity when communicating with customers with disabilities. (Appendix N - ORR Mandatory Training Outcomes for Disability Training).

The industry has set out its intention to ensure no customer is left behind because of the proposed changes. A customer's specific requirements vary by their disability, and EMR is working with suppliers to ensure that TVMs are as accessible as reasonably possible.

EMR is proposing that stations will have a clearly identified 'Welcome Point'. A 'Welcome Point' will be the initial focal point on entering a station. This is the point where any customer can access support and/or advice from EMR staff and a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it.

The concept of a 'Welcome Point' will be considered across all types of stations with the support of the ERM Accessibility and Inclusion Panel.

For Regulated Stations that will continue to have Ticket Offices (as per Schedule 17 of the TSA), the Welcome Point may be located at the Ticket Office, or an alternative customer information centre at larger stations, this is in line with today's experience.

Where the station is changing from a Regulated Station and the Ticket Office is to close, the Welcome Point would be in a clearly signed location within the station. During staffed hours this location would have a member of staff nearby to offer advice and support. While the primary role of the Welcome Point is to offer support and guidance to customer to use the station facilities, such as TVMs, where possible, any member of staff will have access to a mobile-TIS to retail tickets as necessary.

Out of staffed hours these locations could also offer access to a 'Help Point' and additional guidance and information.

These 'Welcome Points' will be clearly accessible/visible from the station entrance and close to any ticket retailing facilities where appropriate. The 'Welcome Point' should include standardised information for customers including:

- What ticket buying facilities and payment methods are available (via staff and/or TVM)
- What online facilities can be accessed to buy a ticket there and then on a mobile device (QR code to a 24/7 What's App link to EMR Customer Services)
- 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/help point/phone number/webchat, What's App, etc)

Where a disabled customer is unable to use a TVM and is not traveling with a companion, the 'Welcome Point' will be a place to start their journey, seek assistance with buying tickets including use of a TVM, as necessary. In addition, our Accessible Travel Policy commits to customer being able to board the train without a ticket if the ticket machine is inaccessible to them. Customers can then buy a ticket onboard (if available) or at their destination station without a penalty. This is an ORR requirement. This is also referenced as an acceptable mitigation in the National Technical Specification Notice – Persons with Reduced Mobility (January 2021) (Section 4.4.1 – Infrastructure Subsystem) and the National Rail Conditions of Travel (6.1.3.3).

After reviewing the initial feedback that you have sent, we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature. Therefore, staff will be available to assist customers with ticket purchasing for broadly the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours."

20 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)?

"EMR's multi-skilled hosts will be positioned at designated welcome / assistance points, in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis with input from our accessibility panel). A 'Welcome

Point / assistance 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. If assistance is required customers will be able to ask for this support. At stations where there is one colleague on duty and they are called away to assist a customer on another part of the station, as they could be today from a ticket office, the colleague will return to the area of the welcome point / assistance point once this assistance is provided.

Customers will continue to be able to access a range of ticket purchasing channels including via our on board teams, contact centres and online or mobile portals.

EMR will explore the feasibility of installing a remote assistance option via the TVM estate across our network, we are currently rolling out WhatsApp QR codes which allow for customers to speak with a member of our customer contact centre team directly to support with enquiries and assistance bookings.

After reviewing the initial feedback that you have sent, EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature. This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance with TVMs.

Please refer to Appendix A for an overview of the revised staffing provision."

21 "Have you assessed the accessibility of existing ticket machines, both in terms of their location at the station and useability?"

This includes whether they are under cover, whether Customers queuing are protected from the weather and whether they can be read in direct sunlight." "In 2021, all TVMs and Smart Kiosks were surveyed to ensure that wheelchair users and people of small stature could physically access the functionality of the machines.

EMR ticket machines are located in the optimal positions on stations so customers can easily find them using clear wayfinding signage. Ticket machines are located in accessible positions and take into account the peak demand at the station. Further considerations such as sun glare, visibility from a safety and security perspective and the requirements for shelters are also taken into account.

EMR's ticket machine supplier has confirmed that the ticket machines at EMR stations conform to DfT's 'Design Standards for Accessible Stations'.

There are 2 locations (Oakham and Narborough) on the EMR network identified where we do not have a ticket Machine, subject to our business case approval, we have submitted the request for two smart kiosks to be installed at these locations, subject to landlord and listed buildings consent approval. We will identify a position that supports the best location for user accessibility and where we can obtain power and network access. "

22 "How do you propose to replenish TVMs at stations where the proposal is to replace the ticket office with daily/weekly mobile team visit?"

"After reviewing the initial feedback that you have sent, EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. a reduction of less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they will be available to replenish TVMs for the same hours as today

Please refer to Appendix A for an overview of the revised staffing provision.

As an additional mitigation, EMR would work with its current supplier Sec Plus to obtain support in daily emptying and replenishing or cash and ticket rolls."

23 What are the contractual SLAs for fixing out of order ticket machines and have these been reviewed given the future importance of ticket machines?

EMR has a robust Service Level Agreement (SLA) with its supplier to maintain ticket machines with agreed response time and fix times. EMR has a contractual business plan commitment to meet this Service Level Agreement (SLA) with the supplier. EMR is currently reviewing this SLA to reflect expected future usage. In addition, as part of the contractual Service Quality Regime, independent auditors visit ticket machines on a periodic basis to ensure that they are working to full capacity. These auditors can raise a failure within the EMR fault rectification system which triggers the contractor to fix the fault. EMR also has internal field engineers who monitor the availability of its ticket machines and respond to any faults that may occur.

24 Will there be standards for maximum queuing times at ticket machines and how will queue lengths be monitored?

"Where EMR propose to close a ticket office, changing from a Regulated Station, EMR will continue to use reasonable endeavours 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 Appendix M). 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 EMR's targeted active promotion of online purchasing and the fact that all EMR trains have Guards/Train Managers on board who can sell tickets and station staff will monitor queues and ensure customer are not delayed. EMR is therefore not expecting TVMs to need to meet the same demand as ticket offices currently, even during peak periods.

Feedback will be actively sought from colleagues on any build-up of queues. Local and senior managers are constantly across the network at busier times of the day and will also be observing practices as part of their roles.

Customers can provide on the spot feedback to EMR directly through various customer feedback methods, online and via its 24/7 customer service centre.

If a customer is unable to buy a ticket before they board a train, for example if the TVM is not accessible to the person, they are unable to stand/queue, or have a non-visible disability, they can buy a ticket without penalty on the train or at their destination station. Customers will still be able to use their Disabled Persons Railcard (or any other valid railcard) or receive the relevant discounts. EMR staff have all received enhanced disability awareness training which enables them to proactively identify customers who may need help or assistance. This policy is supported by the EMR Accessible Travel Policy and the National Rail Conditions of Travel."

Availability of staff to provide retail help and advice

25 EMR are proposing a number of hub stations in various parts of your network. What rationale was used for determining which stations were designated as Customer Information Centres?

"EMR is proposing 6 Customer Information Centres at its major stations, Sheffield, Derby, Nottingham, Lincoln, Leicester and London St Pancras – Customer Information Centres would sell a full range of products, as well as providing help with more complex transactions.

The location and service offering of the Customer Information Centres will be advertised on EMR's website, the National Rail website and on all non Customer Information Centres stations, including those that are unstaffed.

Customer information centres have been placed at its major interchange locations across the network, in stations where the volume of tickets sold and the variety of ticket related queries is complex. EMR also selected locations to ensure a good geographical spread across its network, for example having a Customer Information Centre at Lincoln.

The proposal aims to encourage more independent purchasing of tickets whilst giving confidence to EMR customers with the support of multiskilled colleagues to offer understanding of products sold.

EMR plan to break down the barrier of a 'glass wall' which can be difficult with those who experience hearing loss or the elderly and more vulnerable.

Station facilities will remain available through amended hours and station infrastructure will remain unchanged offering accessibility for those who may need support or are of limited capability. "

26 How does the role of a Customer Information Centre differ from a Ticket office?

Customer Information centres will be the focal point of EMR main interchange locations where customers can speak to one of our team about their journey in detail, the focus of the operation will shift from retailing the ticket and move towards giving the customer all the information they need to make an informed decision before making their purchase at a time of their choosing via a channel of their choice whether this be supported in the station at our TVMs or from the comfort of their home via one of our digital channels. CICs will allow EMR colleagues to engage with our customers in a more informal manner than they do today.

27 "Are the proposed (reduced) staffing levels at Customer Information Centres sufficient to ensure assistance with ticket purchases can still be offered at busier times alongside other duties? Do you have any evidence / assessments to support this?"

"Yes, data was collated from the proposed 6 Customer Information Centres. EMR obtained Ticket Data from both our Ticket windows and Ticket machines at these locations, EMR were able to determine which were its busiest periods and how many tickets were sold every hour.

This has allowed to EMR understand what staffing levels would be required as part of EMR's proposal for the customer information centres.

EMR's resourcing position at the proposed customer information centres is delivered across a 3 year timescale, with more colleagues available at the start of the process; supporting customers to understand how they can purchase tickets through TVMs and via digital channels, only where the customer cannot complete their transaction using these alternative methods would EMR envisage the customer being served via a traditional TIS.

In April, 2023 the industry sold 30.9% paper tickets, 65.7% barcode tickets and 2.1% Smartcard tickets. This demonstrates a lesser need for a full-time ticket office and an opportunity to introduce a multi-skilled grade of employee who can carry out a variety of roles dependant on customer requirements at the time of travel."

28 Will multi-functional staff 'Customer Service Officer' have a role in ticket retailing? If so can you provide detail on what level of ticket retailing that shall entail

" Yes, EMR proposed multi-skilled band 3 colleagues and above will be expected to support in the retail of products on EMR stations. The dedicated band 4a colleagues will be trained to the same standards as ticket office colleagues are today, all other referenced grades will receive training to enable them to support the retail of the right product for the right journey through our TVMs or smart kiosks at stations. Where customer information centres are located all colleagues working within these will be graded at Band 4A where colleagues are working at locations without a CIC or traditional ticket office the colleagues would be graded at Band 3. The proposed job descriptions are attached as supporting evidence. (Job descriptions are still part of EMR's internal trade union discussions and may be revised with feedback from trade union partners)

This approach will enable EMR to offer a progressive and versatile customer experience. Staff will be taken from behind a ticket office window, breaking down the barrier to be more accessible and visible, dedicating more of their working day to proactively approaching and assisting customers.

Revising EMR's working practices will allow flexibility across its network and more opportunities for us to invest in its people - providing further training, development, and experience. "

29 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 Customers get the right ticket? Will this be comparable to the training given to ticket office staff currently?

"Multi-skilled colleagues, will be provided with a level of training in relation to ticketing and the product range that colleagues in the ticket office are today.(Band 4a will be trained to the same standard as a ticket office colleagues today). All grades will receive training to enable them to support the retail of the right product for the right journey through our TVMs or smart kiosks at stations.

-Attached as supporting evidence is the training modules that will be provided to each grade of colleague across the EMR network under the Stations Multi-Skilling programme. Where a station doesn't have a customer information centre but does have a permanent colleague

presence these colleagues will be trained to Band 3 (it is noted that for a period of time post implementation there will be colleagues across the network who are displaced from higher grades and could therefore be trained to a higher grade).

EMR will be providing a modern experience which is responsive to the changing demand and needs of customers which aspires to meet the priorities of customers; safety and security, customer service and sales "

30 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?

"EMR is proposing that its stations will have a clearly identified 'Welcome Point'. A 'Welcome 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 'Welcome Point' will be considered across all types of stations following the consultation process:

For Regulated Stations that will continue to have Ticket Office (as per Schedule 17 of the TSA), the Welcome Point may be located at the Ticket Office, or an alternative customer information point at larger stations, as it often is today.

In EMR's larger stations e.g. Kettering, colleagues will be in the booking hall supporting the operation of its ticket gates as well as on the platforms, at its customer information centres colleagues will be alongside the TVMs to support customer purchases and move the sale towards a traditional TIS where needed.

Where the station is changing from a Regulated Station and the Ticket Office is to close, the Welcome Point would be a clearly signed location within the station. During staffed hours this location would have a member/members of staff nearby to offer advice and support. EMR expect the number of customers that can be supported at any one time will mirror the number of staff available. While the primary role of the Welcome Point is to offer support and guidance to customer to use the station facilities, such as TVMs, where possible, any member of staff will have access to a mobile-TIS to retail tickets as necessary.

Out of staffed hours these locations could also offer access to a 'Help Point' and additional guidance and information.

These 'Welcome Points' will be clearly accessible / visible from the station entrance and close to any ticket retailing facilities where appropriate. (Station welcome point/ assistance point locations will be advertised via EMR's website and NRE alongside station welcome posters). "

31 What will the queuing arrangements be when multiple Customers want help/advice?

"EMR's proposed multi-skilled hosts will be positioned at designated welcome / assistance points; the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis). A 'Welcome Point / assistance 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. If assistance is required customers will be able to ask for this support.

The queuing arrangements at stations will follow the same principles that are used today at ticket offices. Tensator barriers will be used to organise any queues at ticket machines where

required - these arrangements currently exist at a number of locations when justified. EMR is committed to working with customers to encourage transition to ""digital first"" retail methods in order to minimise the number of customers required to queue at ticket machines. "

32 How will people know when a station shall be staffed by a daily/weekly mobile visit and for what hours?

"Exact hours of each visit will be determined by the outcomes of the internal trade union consultation. Once these hours are agreed they will be published on EMR's website and on the station welcome posters.

(Colleagues will be available at the station in a multi-skilled role for the hours that the current ticket office is open - these will continue to be advertised via NRE and EMR websites and on the station welcome posters.

The expectation will be that a colleague is available for a period of time that was previously the station's ""peak"" hours. EMR continue to work with its trade union partners around the exact deployment plans for the proposed mobile colleagues and will of course take into account the feedback of the customer bodies when concluding its internal consultations

After reviewing the initial feedback that you have sent EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature. This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today.

Please refer to Appendix A for an overview of the revised staffing provision."

33 "What are the proposed duties for mobile staff? Will they have a role in ticket retailing? If so, can you provide detail on what level of ticket retailing that shall entail."

"After reviewing the initial feedback that you have sent EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature. This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Therefore staff will be available to assist customers with ticket purchasing for broadly the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours.

Multi-skilled colleagues, will be provided with a level of training in relation to ticketing and the product range that colleagues in the ticket office are today.(Band 4a will be trained to the same standard as a ticket office colleagues today) All grades will receive training to enable

them to support the retail of the right product for the right journey through our TVMs or smart kiosks at stations.

Attached as supporting evidence is the training modules that will be provided to each grade of colleague across the EMR network under the Stations Multi Skilling programme. Where a station does not have a customer information centre but does have a permanent colleague presence these colleagues will be trained to Band 3 (it is noted that for a period of time post implementation there will be colleagues across the network who are displaced from higher grades and could therefore be trained to a higher grade). "

Paying by cash

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

"EMR has reviewed the level of cash transactions through both Ticket Offices and ticket machines and there are no concerns with the increase in cash payments through the ticket machines.

The ticket machines will continue to be emptied of cash with no limitations of the number of coins or notes accepted.

EMR will ensure that ticket machines are sufficiently resourced to ensure cash useage at the required levels. TVMs notify EMR when they are full and our cash collection regime is with SecPlus who support and will maintain replenishing and collection of cash.

Supporting evidence around the volume of cash transactions at EMR's TVMs is provided as suplmentaty evidence."

35 If a person needs to pay by cash and cannot, what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform Customers about this?

"At least one of EMR's ticket machines at almost every EMR location accepts cash as a method of payment and is clearly signed to that effect. EMR has taken steps to ensure the continuation of this facility in the future with arrangements for machine maintenance together with cash deliveries and collections to support this method of payment. In addition EMR's multi-skilled hosts will be trained to attend to minor faults to ensure this facility is maintained. (Oakham and Narborough will have Smart Kiosks installed which do not accept cash. Customers who are unable to use these machines would be able to board the train service and buy their tickets from the on board colleague, all trains that serve the EMR network have an onboard colleague who can retail tickets.)

In the event that a ticket machine is unable to take cash, as per the policy today, appropriate discretion would be applied as all EMR services has a guard onboard with the opportunity to sell the customer a ticket for travel. The National Rail Conditions of Travel provides the conditions under which a customer may travel without a ticket without incurring a penalty fare.

After reviewing the initial feedback that you have sent EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling

proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours.

Therefore if a customer is unable to obtain a ticket the multi-skilled host will firstly undertake finger tip maintenance of the ticket machine to resolve the issue. If the fault continues the host will report both the fault and also ensure that messaging is sent out across the EMR network advising the non availability of cash purchase facilities from that station. This process is already established."

36 How will Customers with cash be able to buy the products listed above in relation to ticket machines?

"The intention is to ensure that customers can continue to pay for tickets in cash. EMR is currently working with the industry to facilitate access to those products that cannot at present be purchased via a ticket machine subject to finalising the relevant agreements and assessments.

Additionally, EMR has a guard on board all services and where a customer cannot obtain a ticket for travel prior to departure, tickets can be purchased on board with cash."

37 Will all stations have TVMs that accept cash?

We have reviewed all our stations that would be affected by our proposals and we have identified 2 locations where we currently do not have a ticket machine, as part of our business plan, we propose to install a smart kiosk at Narborough and Oakham, this is subject to landlord and listed buildings consent. All other locations affected by the proposed changes have at least one Ticket machine which accepts cash and card transactions. EMR will continue to support the transition where possible to "digital first" retail channels as part of our implementation plans.

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

38 When station staffing hours are reduced how will turn up and go assistance for disabled Customers be maintained?

"There are no changes to the current arrangements for customers requesting Turn up and Go Passenger Assistance. Ticket Office colleagues do not carry out Turn Up and Go Passenger Assistance requests. Customers who make these requests are supported by station colleagues at our larger stations and our onboard colleagues for unstaffed and smaller stations.

EMR has been providing a Turn up and Go Passenger Assistance service since 2008. EMR has a robust and successful process in place for Turn up and Go customers and since 2014 this service has been further supported by EMR's 24/7 customer service centre who can consistently support customers.

On arrival at an un-staffed/part-staffed station customers can request assistance by waiting on the platform, or via the Help Point or by using a dedicated WhatsApp messaging service

(of which signage is displayed on Help Points). At staffed stations customers can ask a member of the station team to support them.

In 2024, EMR is installing assistance boarding points on to platforms at stations which do not have staff, or have staff on a part time basis, this will be on a schedule of delivery based on station assistance demands and passenger volumes. These points will assist staff and customers by enabling easy identification of a customer who would like assistance, whether that be visible or non-visible disability.

Should a customer need Customer Assistance on a turn up and go basis they can inform EMR via the station Help Point. The 24/7 customer service team are on hand to support customers with these requests. All teams have been trained in the needs of customers with disabilities.

This is supported by each operator's Accessible Travel Policy (appendix J) that sets out the commitments to ensure an accessible railway for all customers, including those requesting assistance on a Turn Up and Go basis.

After reviewing the initial feedback that you have sent, EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e., less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations -including an update to our proposed station staffing hours.

The EMR Customer Information Team services are available 24 hours through varying channels such as phone, WhatsApp, social media and email, with the exception of Christmas Day. The team ensure customers can be assisted with their train journey, or, where reasonably practicable, provided with alternative accessible transport at no extra cost. Where reasonable we commit to assisting the customer on to the next available service, which is suitable for the individual needs, considering availability of on-board facilities, wheelchair spaces and priority seating, and seating when services are busy.

EMR does not propose any changes to the existing availability of staffing at its stations. Where staff are available currently, they will remain available under the proposals and the existing processes detailed above will not change. This is supported by our commitments in the EMR Accessible Travel Policy. EMR is committed to ensuring that it provides an accessible railway for all passengers in whichever way they choose to travel.

After reviewing the initial feedback that you have sent we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. "

39 If this is reliant on onboard staff how will Customers be assisted to move around the station to the platform / to purchase the correct ticket / get advice / journey plan? How will Customers alert the guard if they haven't pre-booked assistance?

"As today, outside of staffing hours, Guards and Train Managers can provide assistance at all of our locations. EMR have either a Guard or a Train Manager on every train. On train crews are equipped to sell tickets and can advise customers on their journeys.

Guards and Train Managers have access to the Passenger Assistance App (this is a national app that is available to all Train Operating Companies) so they can see who has booked assistance for their service. EMR's on train staff are trained to identify key signs that a customer may need some help - such as having a mobility aid, guide dog, cane, wearing a sunflower lanyard or if they produce a TALK or Just a Minute Card. Customers can also ask the Guards/Train Managers for assistance if they haven't got a booking.

By August 2024 we intend to install assistance boarding points at accessible platforms, our on board teams will be able to clearly check these areas to ensure that any customer requiring assistance is given relevant support to board. Passenger Assistance is already carried out by the on train crew at unstaffed stations."

40 If the mitigation is a mobile team how long will people have to wait? If you currently use mobile teams to provide assistance do you have any evidence on their effectiveness (e.g. time taken to arrive, Customer satisfaction)

"After reviewing the initial feedback that EMR has sent EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours.

As part of EMR's proposals, EMR intend to install assistance boarding points at all accessible platforms, EMR's on board teams will be tasked to check these areas to ensure that any customer requiring assistance is given relevant support to board. The majority of stations affected by the proposals already rely on the ""OnBoard"" colleagues to undertake customer assistance."

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

"An accessible taxi will be used as last resort (this is the policy today). There is a national issue with the provision and availability of accessible taxis because of the lack of regulation. EMR do not anticipate any increase in the use of accessible taxis based on its current proposals. The use of taxis to deliver customer assistance is, and will remain, a last resort in the event of service disruption and or the destination station not being accessible. Where a station is accessible there will be no change and customers will continue to be supported in boarding and leaving our services by EMR's on board teams. When taxi provision is offered EMR considers the assistance requirements, the relative journey times involved and the availability of taxis in the area.

EMR is working closely with industry stakeholders to support the increase in provision of accessible taxis available. EMR manages the relationship with the taxi contractors closely and regular meetings are held with the customer service and procurement team to hold them to account and improve where necessary."

42 What monitoring regimes will be put in place to measure time taken and reliability?

"EMR already has an established complaints review process (Appendix O Customer Complaints Handling Procedure) and the Accessibility & Inclusion Manager has oversight of all accessibility related complaints to drive an appropriate investigation and corrective actions. A cross-section of complaints are also taken to the EMR Accessibility and Inclusion Panel who support EMR in how to improve when the service goes wrong. EMR's Customer Service Director is accountable for improving the customer experience for those with a disability and reports to the Department for Transport on an annual basis with the improvements that have been made over the previous 12 months.

Accessible taxis when required are procured through a contract with CMAC (a nationwide taxi contract management and booking company), this allows EMR to access a wide variety of operators from across the local area increasing the pool of accessible vehicles. EMR regularly review the performance of our contract with CMAC against a commercial KPIs.

EMR also chair a regular working group attended by our Accessibility Panel to drive strategic actions. Staff will be asked to report any known issues (as today) to drive any investigations necessary. We will also continue to monitor through EMR's Passenger Assistance reporting, Customer Feedback and complaints, Post Travel Survey, the customer rating through national Passenger Assistance App and stakeholder engagement."

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

"Help Points are available at all EMR stations. Customers can communicate verbally through the Help Point. The Help Point also signposts customers to WhatsApp, for those who rely on text/written word (via a QR code). Whether the customer contacts us verbally or by text they access EMR's 24/7 Customer Service Centre who are available to help. The British Deaf Association have identified WhatsApp as the preferred communication channel for Deaf/deaf or hard of hearing customers.

Virtual wayfinding tours are available through the EMR website, enabling customers to explore the station environment before they travel. 10 more stations will have a virtual tour created before April 2024. The virtual tours have been very popular with EMR many customer groups. The virtual tours have audio, BSL and captioned information provision to support customers with hearing and sight loss.

Customers can also contact our Customer Service Centre; 24/7 should they require reassurance and assistance. EMR will increase the visibility of the Customer Service Centre contact details at stations and on train.

EMR is conducting a pilot into audio signage at its stations. The pilot will take place before March 2024 and if successful EMR will roll out the system to more stations in 2025.

On train staff also provide support to customers and can fulfil the need to deploy a ramp from the platform - allowing access to the train. This is an accepted procedure at unstaffed locations. EMR has been providing the same service at 75 of its 104 stations.

After reviewing the initial feedback that you have sent EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing

hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Therefore staff will continue to be available at stations to deliver unbooked assistance for the similar hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours."

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

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45 "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?"

"The rationale for determining the staffing at stations, was based on the peak customer demand, assistance requests, the number of ticket sales at a station either via the current ticket office or ticket machine and the removal of certain duties from colleagues at some stations. The consolidation of former platform duties and ticket office duties will result in adequate number of staff to assist customers. In most cases, this will result in more staff available for critical duties such as Passenger Assistance. The provision of assistance will remain a priority.

EMR has a guard or train manager on all services. These colleagues will continue to provide assistance to booked and unbooked passenger assistance requests

On train staff provide a ramp from the platform allowing access to the train. This is an already accepted procedure at unstaffed locations. EMR has been providing the same service at 75 of its 104 stations.

Handover of assistance can be completed by on train staff once the customer boards the service. The on-train team can assign the handover protocol to the Customer Service Centre, who can carry out the process remotely. The Customer Service Centre is available 24/7."

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

"The provision of Passenger Assistance does not sit within the job descriptions of the majority of colleagues working in ticket offices across the EMR network and therefore the removal of staff at certain locations will not affect assistance provision.

EMR will continue to have a member of staff on board all of our services allowing customers to travel with or without a booking to all locations that are physically accessible across the network. Where colleagues do remain at stations these colleagues will be trained to deliver Passenger Assistance in line with Multi Skilled principles currently being discussed with our trade union partners.

The provision of assistance will be a priority for our multi skilled hosts, both those based at a station and the mobile teams. The removal of certain duties at some stations and the movement of staff from behind a ticket window will allow multi skilled hosts to focus on providing assistance when required.

After reviewing the initial feedback that you have sent we have reviewed all our proposals, and made some significant amendments to the hours during which stations will have a

permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations including an update to our proposed station staffing hours. "

47 How will staff at the station know if Customers need help to board?

"At part staffed and un-staffed stations, customers can request assistance via the Help Point phone or use WhatsApp messaging of which signage is displayed on the help-point. Help points are available at all stations under the proposal.

Under the proposal EMR does not plan to remove staff at any stations which currently have staff. The existing processes for part-staffed and un-staffed stations will remain as they are today (as identified in Q48). EMR has a 24/7 omni-channel customer service centre, meaning customers can talk to staff through a variety of verbal and typed communication. EMR does have plans to improve accessibility to services, particularly at stations which do not have staff. These are detailed below.

In 2024 EMR is installing assistance boarding points on to platforms at stations which do not have staff, or have staff on a part time basis. The order in which the assistance points are rolled-out will be based on station assistance demands and customer volumes. These points will assist staff and customers by enabling easy identification of a customer who would like assistance, whether that be visible or non-visible disability. EMR also train staff to identify key signs that a customer may need some help - such as having a mobility aid, guide dog, cane, or wearing a sunflower lanyard, its is also proactive in approaching our customers.

EMR is delivering a project to give customers use of 'passenger companion device', this portable device provides in-the moment 'push' wayfinding for users with less visible disabilities, such as anxiety, empowering them to travel with confidence on the rail network without the need for a smartphone.

In 2024, EMR will be trialling a pilot of audio-signage at unstaffed locations to help customers with sight-loss navigate stations.

By December 2023, EMR will be providing BSL sign-video services to staff and customers. This will enable staff and customers to communicate using sign language live translation. This will be available for frontline colleagues at stations, on-train and in the EMR Customer Service Centre.

After reviewing the initial feedback that you have sent, EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e., less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours. "

48 How will the focal point of the ticket office/ window be replicated?

"Our proposed hosts will be positioned at the designated welcome/assistance points in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station by station basis with input from our accessibility panel). A 'Welcome Point/assistance 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.

Assistance booking portals and contact centres will be updated alongside EMR and NRE websites detailing where the customer assistance/meeting points are positioned."

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

"Help Points are available at stations. Customers can communicate verbally through the Help Point. The Help Point also signposts customers to WhatsApp (via a QR code) where access to EMR's 24/7 Customer Service Centre is available. The British Deaf Association has identified WhatsApp as the preferred communication channel for deaf/deaf or hard of hearing customers.

Virtual wayfinding tours are available through the EMR website, enabling customers to explore the station environment before they travel. More virtual tours will be created as these have been very popular with customer groups. Virtual tours have audio, BSL and captioned information provision to support customers with hearing and sight loss.

Customers can also contact our Customer Service Centre; 24/7 should they require reassurance. EMR will increase the visibility of the Customer Service Centre contact details at stations and on train.

Additionally, EMR is looking at the trial of audio signage at one of our locations. Depending on the success of the pilot EMR will then roll out the facility to more stations on their network (based on customer numbers and how accessible the station is).

On train staff also provide support to customers and can fulfil the need to deploy a ramp from the platform allowing access to the train. This is an already accepted procedure at unstaffed locations. EMR has been providing the same service at 75 of its 104 stations.

After reviewing the initial feedback that you have sent EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Therefore staff will continue to be available at stations to deliver unbooked assistance for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours."

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

"Yes, hearing loops are in EMR staffed locations and it will review where they are currently situated and whether they are in a suitable location following our proposal.

EMR's proposed hosts will be positioned at designated welcome/assistance points in which the default position will be as close as possible to the ticket machines (this will be reviewed

on a station by station basis with input from our Accessibility and Inclusion Panel). EMR will also procure and implement mobile hearing loops in staffed stations.

It is anticipated that all stations will have an induction loop (whether fixed or mobile). The amount of loops and locations will be determined on a station by station basis with support from EMR's Accessibility and Inclusion Panel."

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

"EMR already has an established complaints review process whereby the Accessibility & Inclusion Manager has oversight of all accessibility related complaints to drive an appropriate investigation and corrective actions.

EMR also has the opportunity to internally investigate where any potential Passenger Assistance has not been provided, reported via its customer service centre and fed back to the relevant department where an internal review takes place. Understanding the root cause helps to mitigate against them happening in future.

The EMR Senior Leadership team are provided with periodic data on Passenger Assistance failures and complaints. The Customer Service Leadership team meet on a weekly basis where every PA failure is discussed to find the root cause, and heads of service are held accountable to investigate and improve services in the future.

In addition to this EMR operate the following feedback systems on a periodic basis.

- Post travel survey (circa 1800 responses per week).
- Assisted Travel Survey (circa 120 responses per period)
- PA App rating from the Transreport system
- Customer panels
- Local Accessibility Panels
- Mystery shopping
- Accessibility and Inclusion Panel
- Customer complaint data
- Online Customer Forum

All of the data relevant to accessibility and disability garnered from the above, is analysed and reviewed on a periodic basis by the Accessibility & Inclusion team, and at the EMR Customer Board, which is attended by the extended leadership team.

Periodic data is also supplied to the Office of Road and Rail on assisted journeys, accessibility complaints, redress provided as a result of failed assistance and alternative transport provisions.

EMR produce a period (4-weekly) accessibility and complaints data dashboard, this data is shared with EMR Area Station Managers and Network Rail (for London St Pancras delivery) to highlight any problem areas and create action/improvement plans. This process will not change."

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

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

"In the majority of cases ancillary information is displayed in the ticket hall area, at the front of the station or on the platforms. At stations with a ticket hall, this will remain open for the same amount of time as today. At the small number of locations where this information is displayed in the ticket office, the information will be moved to an area accessible to customers.

These publications will still be provided at EMR's stations and will be located within the waiting rooms. Customers can also request information via one of our customer information channels including the contact centre, social media and WhatsApp.

EMR is proposing that our stations will have a clearly identified 'Welcome Point'. A 'Welcome 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, local travel information, local bus timetables at the 'Welcome Point'. The concept of a 'Welcome Point' will be considered across all types of stations following the consultation process.

Every station will have a visible standardised template poster at appropriate location(s) that clearly states:

- What ticket buying facilities and payment methods are available (via staff and/or TVM)
- What online facilities can be accessed to buy a ticket there and then on a mobile device (QR code/weblink – default would be the retailing site of the SFO)
- 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/help point/phone number/webchat.etc"

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

Colleagues on the stations are all issued with smart phones preloaded with a range of applications (such as the national Passenger Assistance App and Multi Modal Journey Planners) designed to give up-to-date information to both the colleague and the customer. Where there is a proposal to close a ticket office, EMR will be retaining a colleague office where traditional computers and printers will be located to enable more detailed enquiries to be undertaken and itineraries to be printed if requested.

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

"Yes, help points are at all of EMR stations in scope. All help points have been checked to ensure they are accessible. There are no plans to position help points near ticket offices as

most are visible from the entrance of platforms. No customers need to use a footbridge to access a help point.

Customers can communicate verbally through a help point. The help point also signposts customers to WhatsApp (via a QR code) where access to EMR's 24/7 Customer Service Centre is available.

The British Deaf Association have identified WhatsApp as the preferred communication channel for deaf/deaf or hard of hearing customers.

EMR continue to invest in information provision across the network, replacing and installing additional equipment where required in line with EMR's obligations under the NRC. "

55 What are your existing processes and SLAs for monitoring that help points are working, how quickly calls are answered and the response time to repair faults maintained? What future commitments can you give?

"Station colleagues test the help points at frequent intervals as part of their daily station assurance checks.

Help points on EMR stations are tested regularly in order to ensure that they are in good working order. Station colleagues test them as part of their daily readiness checks - this is supported by the periodic Planned General Inspections. If EMR find one to be faulty this is escalated through its "Concerto" FM Help Desk and assigned to the relevant maintenance team for urgent rectification. The failure of a help point at a station requires a 24 hour initial response from the maintenance contractor.

The reliability and functionality of EMR's help points is assessed as part of our SQR monitoring regime."

56 What are the standards for answering help points (i.e. within how many seconds)?

EMR's agreement with National Rail Enquiries (through the Rail Delivery Group) who answer our help points is that calls will be answered within 30 seconds of being dialled.

57 What are the standards for monitoring how quickly you respond to Customers using the emergency button?

EMR's agreement with National Rail Enquiries (through the Rail Delivery Group) who answer our help points is that calls will be answered within 30 seconds of being dialled.

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

EMR track National Rail Enquiries performance through its contract with the Rail Delivery Group and receive periodic compliance data which is reviewed. Testing of help point functionality and answering is also included within the DfT specified Service Quality Regime. All forms of help point performance data is reviewed as part of EMR's internal customer experience governance processes.

59 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?

"There are no current concerns with the resourcing of help point answering. EMR's contract with National Rail Enquiries allows for any required resource uplifts to be implemented on a three monthly rolling basis. The longer-term potential for an increase in help point call volumes has already been discussed with National Rail Enquiries who have assured EMR that other resources can be deployed to support help points should an immediate need arise.

After reviewing the initial feedback that you have sent EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours. "

Issue relating to ensuring Customers are not penalised if they cannot buy the ticket they require from the station.

60 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?

"EMR Guards and Revenue Protection Inspectors currently operate in an environment where many stations are unstaffed or have ticket offices open only in the morning. Procedures are already in place to provide information to on train staff about short-term ticket office closures through sickness etc and any ticket machines that are out of order.

They are therefore experienced in ensuring that customers who genuinely have been unable to purchase a ticket before travel are not penalised. In that environment it is not considered that any change to ticketless travel rules are required.

EMR state in the Accessible Travel Policy if a customer is unable to buy a ticket before boarding one of our trains, you can buy one without penalty on the train or at the destination station.

EMR is currently working across the industry to develop a policy and an effective approach to enable customers to travel without a ticket (also ensuring that customers are not inconvenienced to purchase a ticket at an unacceptable distance from their origin station).

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 customers to travel without a ticket in certain circumstances, including clarification of travel in Compulsory Ticket Areas (CTAs) to ensure customers are not unfairly penalised.

NRCoT and the associated Railways (Penalty Fare) Regulations already provides the conditions under which a customer 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. "

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

"As applies today where customers join at an unstaffed station or one where the ticket office is closed, EMR on train colleagues are trained and experienced in dealing with this situation and there is no evidence of adverse customer feedback to our approach.

This will be included within EMR's training identification for multiskilled colleagues. In some cases, such as for the purchase of specific fares, evidence may be required, as it is today at ticket offices, to validate their entitlement. This is currently the case for access to Special Disabled Fares from ticket offices and the same policy will be continued for other retail channels where that fare is available."

62 How will you review signage to avoid sending inconsistent messages about revenue protection? "As part of the implementation planning for ticket office closures, EMR will ensure that all notices and signage within its 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.

All current Revenue Protection signage is compliant with the Penalty Fare Scheme rules and considered appropriate in not sending an inconsistent message. There is no evidence of customer confusion around the Penalty Fares Scheme"

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

63 In respect to facilities that are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?

"EMR has committed to ensure that customer facilities will remain open for the same amount of time as they are today, as well as ensuring that no station would become unstaffed as part of these proposals. This is supported by a station cleaning team who visit stations to ensure each customer facility is maintained to a high standard alongside EMR's team of existing SST (Station Servicing Technician). This all allows regular checks of customer facilities to remain in place, supported by CCTV.

EMR has CCTV cameras at:

ALFRETON, BEESTON, BOSTON, BURTON ON TRENT, CHESTERFIELD, CORBY, DERBY, EAST MIDLANDS P/WAY, HINCKLEY, KETTERING, KIDSGROVE, LEICESTER, LINCOLN CENTRAL, LONG EATON,

LOUGHBOROUGH, MANSFIELD TOWN, MARKET HARBOROUGH, MELTON MOWBRAY, NEWARK CASTLE, NOTTINGHAM, OAKHAM, SHEFFIELD, SKEGNESS, SLEAFORD, SPALDING, STAMFORD

WELLINGBOROUGH

After reviewing the initial feedback that you have sent, EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Therefore staff will continue to be available to ensure EMR's customer facilities are in good condition for the same hours as today. Please refer to

Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours. "

64 Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn? What are these? How robust will they be?

"EMR has committed to ensure that customer facilities will remain open for the same amount of time as they are today as well as ensuring that no station would become unstaffed as part of these proposals. Mobile teams will also be in place across the network. This is supported by a station cleaning team who visit stations to ensure each customer facility is maintained to a high standard.

EMR will be exploring the use of remote monitoring where possible to support the deployment of colleagues across our network. Remote monitoring is currently being rolled out across all locations where lifts are used to access platforms. EMR will consider remote monitoring (including opening and closing) of toilets and waiting rooms. The ongoing station redevelopment projects at Skegness and Boston have remote monitoring as part of EMR blended plan for delivery of these facilities in the future."

65 And if so when will any proposed mitigations be implemented?

"EMR has committed to ensure that customer facilities will remain open for the same amount of time as they are today, as well as ensuring that no station would become unstaffed as part of these proposals. Mobile teams will also be in place across the network. This is supported by a station cleaning team who visit stations to ensure each customer facility is maintained to a high standard.

This practice will be put in to place as a priority to ensure all facilities remain accessible and available for the same amount of time as they are today."

66 And if facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?

"EMR has committed to ensure that customer facilities will remain open for the same amount of time as they are today, as well as ensuring that no station will become unstaffed as part of these proposals. Mobile teams will also be in place across the network. This is supported by a station cleaning team who visit stations to ensure each customer facility is maintained to a high standard. This all allows regular checks of customer facilities to remain in place, supported by CCTV.

EMR has CCTV cameras at:

ALFRETON, BEESTON, BOSTON, BURTON ON TRENT, CHESTERFIELD, CORBY, DERBY, EAST MIDLANDS P/WAY, HINCKLEY, KETTERING, KIDSGROVE, LEICESTER, LINCOLN CENTRAL, LONG EATON,

LOUGHBOROUGH, MANSFIELD TOWN, MARKET HARBOROUGH, MELTON MOWBRAY, NEWARK CASTLE, NOTTINGHAM, OAKHAM, SHEFFIELD, SKEGNESS, SLEAFORD, SPALDING, STAMFORD

WELLINGBOROUGH

After reviewing the initial feedback that you have sent EMR has reviewed all our proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any

reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Therefore staff will continue to be available to ensure EMR customer facilities are in good condition for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours.

EMR has a contract with Carlisle security to provide Travel Safe Officers who work in partnership with EMR on board teams and revenue protection to ensure stations are not subject to misuse or vandalism."

67 We understand that alarms for 'disabled toilets' are often located in ticket offices. Is this case and, if so, where will these be fitted and how will they be responded to when there are no staff at the station

"In a number of cases the accessible toilet alarm are located in ticket offices, whilst others are located just outside the accessible toilet. EMR is working with a supplier to install an alarm system in accessible toilets that has call routing functionality (subject to business case approval). This will operate in the same way as EMR's current lift alarms. This will mean if there are no staff at the station, the alarm will call a location in which help can be provided.

However, after reviewing the initial feedback that you have sent EMR has reviewed all its proposals, and made some significant amendments to the hours during which stations will have a permanent staff presence. Most stations will see no change in the staffing hours and any reductions that do remain are of a minor nature (i.e. less than an hour a day). This does not change the proposals for large stations and in line with our July proposal there will be some small reductions in staffing hours at medium stations as a result of our multi-skilling proposal. At small stations ticket offices will still close but there will be no change to staffing hours at these stations and roving teams will not be implemented. Staff at these stations will still transition to multi-skilled 'customer help' roles where they can provide assistance for broadly the same hours as today. Therefore staff will continue to be available to respond to an alarm for the same hours as today. Please refer to Appendix A which sets out individual station specific mitigations including an update to EMR's proposed station staffing hours. "

Issues relating to whether Customers feel safe at the station

68 Have you liaised with the British Transport Police about the impact on staff and Customer security?

"Safety and security is a key priority for EMR. EMR has regular engagement with the British Transport Police to understand any safety and security trends on EMR's network. In addition to this, the Department for Transport (DfT) and British Transport Police (BTP) has agreed that we should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. These will be completed once all of EMR's discussions with the Customer Bodies are finalised and once all of EMR's internal consultation has been concluded.

This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed. "

69 Are any mitigations planned?

Any proposed mitigations will be reviewed and implemented based on the outputs of the risk assessments. Therefore, the risk assessment process will need to conclude prior to agreeing any mitigations (should any be required).

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

"CCTV is not remotely monitored at any location across the EMR estate, although there is an aspiration to develop a 24/7 monitored CCTV control room in future. Local monitoring is provided at all stations where CCTV cameras are provided and colleagues are present on site. There are currently no dedicated CCTV operator roles within the EMR stations operation.

EMR has CCTV cameras at:

ALFRETON, BEESTON, BOSTON, BURTON ON TRENT, CHESTERFIELD, CORBY, DERBY, EAST MIDLANDS P/WAY, HINCKLEY, KETTERING, KIDSGROVE, LEICESTER, LINCOLN CENTRAL, LONG EATON,

LOUGHBOROUGH, MANSFIELD TOWN, MARKET HARBOROUGH, MELTON MOWBRAY, NEWARK CASTLE, NOTTINGHAM, OAKHAM, SHEFFIELD, SKEGNESS, SLEAFORD, SPALDING, STAMFORD

WELLINGBOROUGH"

Other Issues

Future Changes

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

"The levels of station staffing will be delivered in the same way as it is today.

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 customer 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. 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 customer 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 customer 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 customer bodies."

72 Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further Customer 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. This does not 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 ticket machines 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)."

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

"The new staffing arrangements will be advertised in the same way in which the current ticket office opening hours are advertised. This would be via the EMR's website on the station information page, National Rail Enquiries via the station information page and the station welcome poster displayed at the station.

Each train company has a Passenger's Charter, which is a published guide to the level of service that customers can expect to receive when using their stations and train services. The charter is reviewed annually, including engagement with the customer bodies (Transport Focus and London TravelWatch) and includes a description of all aspects of the expected services a customer 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."

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

"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 customer 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. 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 customer 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 Customer 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 Customer Bodies"

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

Station resourcing is part of the ongoing internal consultation process with EMR's trade union partners. When proposing any new method of working, the associated rosters are considered in conjunction with trade unions. We operate a rostering principle of 1 in 7 "General Purpose Relief" these colleagues are utilised to ensure that sufficient cover is maintained during periods of annual leave. Local rostering agreements are utilised to provide

cover for short notice sickness and all endeavours are made to maintain coverage during these instances.

Timing of mitigations

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

In many instances, EMR 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. It would also allow for wider station changes and arrangements that will assist with modernisation and efficiencies.

77 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 TF 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.

Train Services across the EMR Network are operated with a second member of staff on board who can retail tickets where required and support in the delivery of accessible travel processes. Cross Country, Northern Trains, Trans Pennine Express, West Midlands Trains, Avant West Coast and LNER all have on board crews available to support in the same manner.

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

78 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.

Liaison with other operators

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

"The impact of the proposals in respect of ticket office closures and alterations have been progressed with all other operators through the consultation process contained in the Secretary of States Guidance for Major Change Proposals.

EMR has been working alongside its industry partners throughout the consultation period in order to appraise them of its plans and to take feedback from them. Third-party operators had the opportunity to formally object to EMR's proposals via consultation, no such formal objections were received. EMR will continue to work with its partners across the rail industry to ensure that its proposed changes are delivered smoothly."

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

EMR's proposals do not fundamentally affect the operation of stations operated by Network Rail. EMR serve NR managed stations in Liverpool, Manchester and London St Pancras. Its operations in Liverpool and Manchester are not affected by the proposed changes. EMR's colleagues at Network Rail High Speed and HS1 have been apprised of its proposals with regards the ticket office in St Pancras; there are no proposed changes to the platform or Customer handling operations at St Pancras.