

By email

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Dear Paul

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

The public consultation period has now ended. We are continuing to process these submissions and analyse the points and concerns raised. We are also continuing to analyse the data you provided to Transport Focus, in particular the information within the major change template '(Annex B)' spreadsheet.

This analysis continues but there are a number of issues that we wanted to flag up at this point, along with a series of questions seeking further clarification.

At the beginning of the consultation process we set out the [criteria](#) we will use when assessing proposals. We have grouped these issues and questions under the main headings in our criteria.

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

- *Adequacy of retail facilities*  
Many proposals appear reliant on passengers switching to purchasing tickets online or from a TVM at the station. While there is a clear trend in moving to digital a substantial number of

people either cannot or have chosen not to move to digital. We know from our research that resistance to booking online often comes from uncertainty and a lack of confidence, exacerbated by the complexity and variety of ticket options available.

*Questions:*

- *What assumptions have you made about how many/what proportion of people will move to digital if ticket offices are closed?*
- *Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?*
- *Have you made any assessment of who will not/cannot move to digital and the effect on them of closing the ticket office?*
- *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?*
- *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?*

Without evidence to the contrary, we must assume that many of these people will continue to want advice and support at the station and not migrate to digital channels. We note that plans include the greater use of existing TVMs at stations but there are no plans to increase the number of TVMs. This raises concerns at the ability to sell the expected number of tickets displaced from the ticket office, especially at peak hours. From the information provided it is clear that there are still significant levels of sales at some stations.

We do not know existing TVM usage (both sales and Ticket on Departure collections) to determine whether there is sufficient capacity to absorb this level of sales. We are also mindful that demand is not evenly spread throughout the day/hour - passengers tend to turn up in clusters, 10 minutes or so before their departure. If TVMs cannot cope with the additional demand there is a risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket.

*Questions:*

- *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?*
- *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?*
- *What assessment have you made of the impact of seasonal peaks, especially at tourist destinations?*
- *Has any assessment of the location of TVMs been carried out – are they in the right place?*
- *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?*

- *How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?*
  - *What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?*
- *Usability, functionality and accessibility of Ticket Vending Machines (TVMs)*  
 TVMs are not capable of offering the same range of products and services as ticket offices. From the information provided It appears that the following products/services will no longer be available from the majority of stations:
    - Advance tickets and reservations
    - Season tickets
    - Railcard Sales (National and regional)
    - Apex single and return tickets
    - Car park tickets
    - Refunds.

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

- National concessions for disabled people (for wheelchair and visuallyimpaired passengers plus a companion)
- Boundary Zone add-ons
- Staff travel discount
- 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)
- Seat reservations
- Changing a booking/tickets
- Use of rail vouchers
- Use of rail warrants
- Ranger and Rover tickets
- Plus Bus tickets
- Ferry connections
- Group Save
- Off-peak purchases before the off-peak begins
- Cycle reservations
- Photocards for season tickets
- Scholar tickets
- Sleeper bookings
- CIV tickets for connections with Eurostar international services.

If many of these products are no longer readily available at the station this would represent a significant reduction in retail capability. Those passengers who do not have access to digital would face a significant reduction in what they can purchase and could end up paying more than they needed to as a result.

*Questions:*

- *Are there any other products, not mentioned in the list above, that passengers will no longer be able to easily purchase from the station if the ticket office is closed?*
- *Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?*
- *Will staff be able to access a ticket machine, or be issued with handheld machines to sell tickets not available from the TVM?*
- *How will passengers access these products and services in future?*
- *How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets?*

TVMs are not physically accessible to all passengers and some people with cognitive disabilities can have difficulties in using them. If staff assistance to purchase a ticket from a TVM is not available at the station – or perhaps via remote/video assistance – passengers, in particular disabled passengers, will find it harder to purchase a ticket before they board the train.

*Questions:*

- *How will disabled people who cannot use a TVM purchase a ticket?*
- *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)?*
- *Is it proposed to upgrade TVMs to offer remote access/video help facilities?*
- *Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability? This includes whether they are under cover, whether passengers queuing are protected from the weather and whether they can be read in direct sunlight?*

An increased reliance on TVMs makes it even more important that they are monitored and maintained. This applies to operational resilience and to customer service quality. We are mindful that there are standards for queuing times at present (3 minutes in the off-peak and 5 minutes in the peak) but that these apply only to the ticket office and not TVMs. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queueing at a ticket office.

*Questions:*

- *What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs?*
- *How do you propose to replenish TVMs at stations where the proposal is to replace the ticket office with daily/weekly mobile team visit?*
- *Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?*

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

At some stations the proposals would mean a substantial reduction in the overall hours of staff at a station and/or the number of staff at the station, both in general and in relation to those with specialist retail knowledge.

At the 5 stations you propose to designate as ‘Customer Information Centres’ there is a pattern of reducing both the hours of retailing availability and the number of staff with specialist retail knowledge. However, you propose that the full range of tickets will only be available at those 5 stations, which could lead to an increase in transactions.

At 15 stations you propose to close the ticket office and expect daily visits from mobile staff at some stations and weekly visits from mobile staff at other stations.

For example:

- Alfreton ticket office will be closing. Although the ticket office will close, you expect to provide daily visits from mobile staff at the station. The timings of these visits are to be determined.
- Hinckley ticket office will be closing. Although the ticket office will close, you expect to provide weekly visits from mobile staff at the station. The timings of these visits are to be determined.

At the remaining 9 stations you propose to close the ticket office. However, the stations will still be staffed with multi-skilled ‘Customer Service Officers’ to fulfil any customer service requirements but the role does not include ticket retailing.

We know from our research that passengers find the fares system complex and confusing and that many people find it difficult to use TVMs. Where staff are removed altogether, where numbers are substantially reduced, or where staff will now have multiple duties, it will make it harder for passengers to receive specialist advice or support from staff to make a ticket purchase.

Even where staff will still be present at the station there are questions whether they will have sufficient expertise to help passengers navigate the complex fares system. In contrast to many other self-service retail situations, for example a self-checkout at a supermarket, many passengers will need support not just to use the ticket vending machine (TVM), but also to understand what they should purchase.

The proposal notes that tickets can be purchased online using the EMR mobile app or via the website. They can also be purchased at station ticket machines.

During station staffing hours, staff will be able to provide advice on the best ticket for your journey, including providing assistance with the EMR mobile app, website, or station ticket machine.

However, there is no mention of purchasing a ticket direct from a Customer Service Officer.

A number of practical questions have also been raised about how the new arrangements would work in practice - for example, in how people will find a staff member if they need help and what queuing arrangements will apply when several people want help at the same time. This is relevant for all passengers, but especially disabled passengers/those requiring assistance.

*Questions:*

- *What rationale was used for determining which ticket offices were to be designated as Customer Information Centres?*
- *How does the role of a Customer Information Centre differ from a ticket office?*
- *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?*
- *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*
- *What training will multi-functional staff have in ticketing/product range to ensure they can provide expert assistance necessary to navigate the complex fares system and ensure passengers get the right ticket? Will this be comparable to the training given to ticket office staff currently?*
- *How will people find a staff member at the station if they are no longer in the ticket office: will there be a central point/method for calling them? What will the queuing arrangements be when multiple passengers want help/advice?*
- *How will people know when a station shall be staffed by a daily/weekly mobile visit and for what hours?*
- *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.*

- *Paying by cash*

From the Annex B data provided it is clear that a significant proportion of tickets sold at some ticket offices are still purchased with cash and passengers prefer this method of payment.

*Questions:*

- *Have you made any specific assessment of the ability of TVMs to cope with the increase in cash, especially at stations where there is a higher than average use of cash to purchase tickets?*
- *If a person cannot pay by cash what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?*
- *How will passengers with cash be able to buy the products listed above in relation to TVMs?*
- *Will all stations have TVMs that accept cash?*

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

It is clear that proposals will result in many stations no longer having staff for significant periods of the day/week during which there is currently a ticket office staff present.

At stations where overall staff presence has been reduced disabled passengers' ability to 'turn up and go' will be impacted. While in many cases staff onboard the train may be able to assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform. While 'mobile' staff may be able to offer this service at some stations, even if this could be delivered robustly, it appears to inevitably mean passengers having to pre-book or wait for the staff to arrive.

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in relation to safety and security, providing information and providing assistance and support.

*Questions:*

- *When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?*
- *If this is reliant on onboard staff how will passengers be assisted to move around the station to the platform/to purchase the correct ticket/get advice/journey plan? How will passengers alert the guard if they haven't pre-booked assistance?*
- *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, passenger satisfaction)*
- *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.*
- *What monitoring regimes will be put in place to measure time taken and reliability?*
- *How will people summon help if staff are not there?*

- *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?*

Even where staff presence has been maintained, in many instances the number of staff available has been reduced. And in other instances, the staff member will now have multiple functions to perform rather than just retail.

*Questions:*

- *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?*
- *What assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?*
- *How will staff at the station know if passengers need help to board?*

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

*Questions:*

- *How will the focal point of the ticket office/window be replicated?*
- *How will people summon help if staff are not there?*
- *Will induction loop facilities be provided elsewhere on the station/concourse?*
- *What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?*

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

While the staff that remain at the station may in some cases be more visible outside of the ticket office, at some stations they may be harder to find when they are required, unless (and as set out above) an alternative focal point for information is provided.

Proposals to reduce the number of staff present risk a detrimental impact on overall customer service for passengers, making it harder for them to access advice and information from staff at these times.



*Questions:*

- *How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?*
- *What devices will staff have – e.g. will they be able to print journey itineraries for passengers who ask for one?*

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

*Questions:*

- *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?*
- *What are your existing processes and SLAs for monitoring that help points are working and the response time to repair faults? What future commitments can you give?*
- *What are the standards for answering help points (i.e. within how many seconds)?*
- *What are the standards for monitoring how quickly you respond to passengers using the emergency button?*
- *How will you monitor/report time taken to answer help point calls/proportion not answered?*
- *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?*

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

Proposals to remove ticket offices that rely on TVMs that are not fully accessible, do not sell the full product range or do not accept cash will mean more passengers are unable to buy the right ticket before they board the train. Passengers must be made aware that they can board a train without a ticket if they cannot buy the ticket they need from the station and be confident they will not be penalised if they do so. This must include people who are not able to use a TVM because of a disability.

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

*Questions:*

- *What changes to ticketless travel rules will be made/where will these be written down to give people who can't buy a ticket some assurances that they won't be penalised?*
- *What processes will be in place so that passengers do not have to publicly declare/evidence their disability to buy on the train without penalty?*
- *How will you review signage to avoid sending inconsistent messages about revenue protection?*

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

From the information provided it appears that access to vital station facilities including lifts, waiting rooms and toilets will also be reduced at many stations where staffing hours have been reduced.

*Questions:*

- *Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn? What are these? How robust will they be?*
- *And if so when will any proposed mitigations be implemented?*
- *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?*
- *We understand that alarms for 'disabled' toilets are often located in ticket offices. Is this the case and, if so, where will these be fitted?*

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

Where proposals reduce or remove staff presence at stations this risks making passengers feel less safe. Removal of staff presence in the evenings, as is the case in a number of proposals, seems particularly likely to result in increased concern about personal safety.

*Questions:*

- *Have you liaised with the British Transport Police about the impact on staff and passenger security?*
- *Are any mitigations planned?*
- *Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?*

**Other issues**

A number of additional issues have also emerged during the consultation process:

- *Future changes*

The public consultation feedback has highlighted a widespread concern that if ticket offices are closed and ‘schedule 17’ regulation no longer applies, there will be no further protections to prevent train operators removing all station staff in future without passenger consultation. An alternative regulatory mechanism covering station staffing could provide significant reassurance to passengers and stakeholders on this point.

*Questions:*

- *What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?*
  - *Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?*
  - *How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?*
  - *How will compliance with any agreed new hours be monitored and reported?*
  - *What arrangements have been made to provide staff cover for things like sickness and holiday?*
- *Timing of mitigations*  
There have been many comments about the sequencing of events and a call for fares and ticketing to be reformed and simplified before removing ticket offices. The same applies to the timing of potential mitigations designed to lessen the impact of closing ticket offices, such as upgrading TVMs.

*Questions:*

- *What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?*
  - *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?*
  - *Has any necessary funding/agreement been secured to implement any mitigations?*
- *Liaison with other operators*  
We are mindful that some stations also serve trains run by other train companies or involve Network Rail managed stations.

*Questions:*

- *What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?*
- *Have any discussions been had with Network Rail about the impact at NR managed stations?*

We would welcome further clarification on these points. We recognise that there are a lot of questions and the issues raised are complicated, so we would be happy to meet to discuss these in more detail. However, if we are to reflect any comments in our final submission, we will ultimately require a formal written response on these points.

It would be helpful in fully considering your response if we could receive a written reply by 27 September.

For absolute clarity – and to help ensure transparency – we also want to inform you that we intend to publish this letter and your formal response alongside our final submission. Please be aware of this when responding.

Yours sincerely

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