

East Midland Railway's proposed changes to ticket offices: Transport Focus response

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

1. Introduction

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

Transport Focus recognises that the way many passengers buy their ticket has changed, with increasing numbers choosing to buy online, use apps or Pay As You Go contactless payment. We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 12 per cent of sales on average. We acknowledge that the proposal was designed to respond to this shift in passenger behaviour, with the aim of bringing staff out from ticket offices to better meet passenger needs. It is important to stress that Transport Focus is not against the principle of 'bringing staff out from behind the glass'. Our conclusions below are based solely on the specific proposals received for each station and the potential impact on passengers.

2. Executive summary

East Midlands Railway (EMR) published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 35,165 representations objecting to EMR's proposal and 45 representations supporting EMR's proposal.

Transport Focus used information provided by EMR and the issues raised by passengers to analyse proposals. We based our assessment on the impact of the proposals on quality of service for passengers, however we acknowledge that cost effectiveness is also part of the criteria. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

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

Transport Focus acknowledges that EMR has made significant improvements to its original proposal, especially in reinstating staffing hours at stations. However, having analysed these revised proposals we still have concerns. Some of these are specific to EMR and some are generic issues at an industry-wide level. However, as a result we must object to proposals at **all** stations. A full list of stations is provided at the end of this letter.

The main reasons for this are:

- Welcome Points

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

Welcome Points were not explained as part of the original consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and to gather passenger feedback.

- Access to rail products

We are not satisfied that passengers would continue to enjoy widespread and easy access to the purchase of rail products at some stations. This includes:

- The range of tickets and services offered, including for those reliant on cash.
- Where a passenger presenting at a station is unable to purchase their ticket via a Ticket Vending Machine (TVM) or online due to restrictions on TVM capability.
- The ability to retail a ticketing product via a legacy ticket machine (TIS) at Chesterfield, Corby, East Midlands Parkway, Kettering, Loughborough, Market Harborough and Wellingborough, shall be on an ad-hoc basis.

- Queuing standards at Ticket Vending Machines

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for TVMs. This could be based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken (such as issuing staff with hand-held ticket devices so that they can ‘queue bust’ and/or installing extra TVMs).

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

In addition, Derby, Leicester, Lincoln, Nottingham and Sheffield stations were not submitted as ‘major changes’ under the Ticketing Settlement Agreement (TSA) process and so were not part of the public consultation. However, we note that passengers submitted comments to Transport Focus on the above stations during the consultation period.

At these stations minor changes have been made to the ticket office opening times, and changes to staffing levels will occur when the ticket offices become designated as Customer Information Centres. These represent a change to the regulated hours and, as they have not been included under the current consultation, we presume they have been submitted to the Department for Transport (DfT) under the minor change arrangements set out in the TSA. Transport Focus is not consulted on minor changes; but we are conscious that [guidance](#) issued by the Secretary of State says that changes may be made under this procedure “if either the total time during which the ticket office is open each day is not materially reduced or the change does not have a material adverse effect on passengers or other operator’s sales through that office”.

We note that part of your mitigations for the major change proposals at affected stations is a greater reliance for passengers at these stations as Customer Information Centres. We would question whether in particular the change in staffing levels does not have a material adverse effect on passengers.

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

3. The process

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

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

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

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

4. Responses to the consultation

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

There were two specific campaigns launched which generated a large number of responses; one by the RMT union which involved emails and 'postcards', and another via the workers' rights network, Organise, which was via email. While the majority of these responses followed a standard template some had been

customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received 35,165 objections to EMR's proposals.

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

In addition, we received 93,184 network-wide objections opposing changes across all stations.

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

More detail can be found in Annex 1.

We also received 45 representations supporting EMR's proposal to close ticket offices out of a total of 721 nationally.

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

5. Criteria for assessment

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

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

Transport Focus may object to a proposal on the grounds that the change does not meet one or both of the criteria above. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State (SofS) for a decision. The Department for Transport has previously published [guidance](#) setting out the

approach the Secretary of State would take in these circumstances. This guidance states that the SofS is “content for Transport Focus and the Operator to continue discussing the proposal, including amending it, if that would enable an agreement to be reached. If the matter is referred to the SofS, the SofS will decide whether the objections are valid or not; in other words, whether the proposed change fails to meet the criteria, or meets the criteria. Alternatively, the procedure permits an arbitrator to be appointed to determine if the criteria are met.”

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

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

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

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

6. Our assessment

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

EMR's original proposal was to:

- Close 16 ticket offices and replace them with mobile staff who would visit the station on a daily or weekly basis, where they would help passengers buy tickets and provide travel advice and information.
- At five larger stations – Leicester, Lincoln, Nottingham, Derby and Sheffield – Customer Information Centres (CIC) would sell a full range of products, as well as providing help with more complex transactions. These CICs would replace the ticket office but they would still be regulated under the terms of the TSA – meaning the existing regulations would move to the CIC. However, the changes do not form part of this consultation process.
- Across the remaining stations, the station opening times would remain the same but the ticket offices would close. At these stations tickets could be purchased via TVMs, with staff helping if needed.

Following further discussion with Transport Focus your letter of 27 September made some significant changes to your proposals:

- Amendments to the hours during which stations will have a permanent staff presence. All stations would now see no change in the staffing hours – with staffing hours reverting to current times. Therefore, staff would be available to assist customers with ticket purchasing for the same hours as today, via digital or TVM transactions.
- The creation of designated Welcome Points. These would be an initial focal point on entering a station that provides support and/or advice. The default position will be as close as possible to the ticket machines, this would be reviewed on a station by station basis.
- Proposal to install additional TVMs at two stations.

We acknowledge that you have made significant changes to your original proposal in response to passenger feedback from the consultation, especially in reverting to current staffing hours in most cases. We know from our research that passengers

value staff at stations highly for safety and security, information, and advice and help purchasing tickets.

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

“I’ve sought help and relied on the kind nature of staff on many occasions. They have always been able to give me assistance and up-to-date news, even in times of stress and delayed or cancelled services.”

“Whenever we travel by train we rely on advice given by staff at the station. Anyone needing additional support or information will have their experience of travel massively degraded.”

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

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

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

Complexity of fares and ticketing

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

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

Comments received during the consultation illustrate this point:

“I will be unable to discuss more complex journey options with staff. Portable devices or tablets are not as quick and easy. Ticket Vending Machines and mobile are unsuitable for me.”

“I hugely value the ticket office as online platforms seem to get even more complicated.”

“I often have a lot of trouble booking online and go to my ticket office where they have the info I need. They make suggestions that are very helpful and not made online. I would be lost without this service.”

Useability of Ticket Vending Machines

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

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

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

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

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

“In my experience Ticket Machines are slow, difficult to use and often not in use. More customers trying to use them will only make this worse.”

“Ticket machines are regularly out of order and the staff have very good knowledge of travel options. Machines do not.”

Retail capacity

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

“They are a range of products and services available at the ticket office that may not be available from a TVM. This includes refunds and season ticket changes.”

“My station is very busy when I buy a ticket there is always a queue.”

Cash

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

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

“This would leave TVMs as my only option. Many don’t accept cash or give refunds.”

Product range

Currently ticket offices provide access to a full list of products and services. TVMs, do not provide that same range of products and services. For example, EMR TVMs do not sell products such as Railcards, Advance Purchase fares, Ranger/Rovers and national concessions for disabled people (for wheelchair and visually impaired passengers plus a companion). Nor do they provide seat reservations, allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

“This would leave TVMs as my only option. Some concessions and ticket types are not available. For example, the 50% wheelchair user discount can only be purchased at ticket offices.”

“Machines do not sell all available tickets or offer seat reservations.”

Your proposals (as revised) stated:

- Your letter of 27 September states that you have “adjusted 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.”
- A new, more flexible 'multi-skilled customer' role is intended to provide a more personal service where staff can take the customer to the TVM and support the customer in purchasing the ticket – while at the same giving 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 EMR handheld ticket machines do not offer the full range of tickets.
- Support will be provided to customers in accessing the full range of ticket types by staff at the station. EMR multi-skilled staff 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 Centres.
- There is a cash payment facility at each station. A solution has been identified for Narborough and Oakham stations.
- TVMs:
 - EMR have analysed projected increases in ticket sales and the data has shown at all locations where a TVM is present there is sufficient capacity to absorb transactions.
 - EMR will be holding a series of 'Try the Train Day' which include short learning sessions on TVMs aimed at increasing the confidence in the full customer experience. There will be a customer communications plan that will explain how to use TVMs.
 - EMR advise that enhancements to TVMs require engagement with the TVM suppliers and development activity. In most cases these changes are not planned to be completed until mid to late 2024. Final plans will be dependent on funding agreements and supplier contracts.
 - However, a number of interim mitigations are proposed to ensure customers are not disadvantaged, for example, staff will be accessible

within the station area to support the purchase of tickets from existing TVMs.

- Staff will be given enhanced access to industry information to validate the status of retail services, such as TVMs at a station level, to assist with understanding a passenger's situation. This will provide reassurance for customers who have not been able to purchase a ticket at their origin station that they will be given the opportunity to purchase their ticket if asked by a member of staff, be that on board, at their destination or by revenue inspection teams.
- There are also industry-wide proposals to:
 - Remove the requirement for a Photocard when purchasing a Season Ticket. Operators will accept any reasonable alternative form of ID, such as a driving licence, passport, Railcard, student ID, alternative entitlement card (senior citizens pass) or national ID card. For customers who do not have access to a suitable alternative form of ID, a Photocard will still be available from remaining Ticket Offices and via post from a contact centre or third party retailer.
 - Offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead.
 - Allow changes to booking or tickets purchased via ticket machines.

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this will ensure that there is a member of staff present at the same times as now at most stations. We also acknowledge that they will be able to help passengers buy tickets from TVMs.

However, we remain concerned with the following:

- i) Some core products and services will no longer be available at the station:*

You have decided to retain the ticket office machine (TOM) at seven stations Chesterfield, Corby, East Midlands Parkway, Kettering, Loughborough, Market Harborough and Wellingborough. Where a customer presenting at a station is unable to purchase their ticket via a TVM or online, a staff member will have the ability to retail the product via a legacy TOM. This mitigation would remain in place until such time that suitable retail mitigations remove the need for it. Multi-skilled staff would, in the first instance, support in the completion of transactions available through TVMs rather than defaulting to legacy TOM equipment. This mitigation will be provided on an ad-hoc, case by case basis, not offering a consistent offering for passengers. We remain concerned that passengers may not be fully aware that this option exists.

Other stations would be reliant on the TVM, they would not retain the TOM and staff would not have access to a ticketing device.

Some products (for example, Rover and Ranger tickets, national concessions for disabled people) would be available on board the train rather than at the station. This would help ensure access, but it leads to a contradiction with Penalty Fare signage/rules requiring people to have a valid ticket before boarding.

The National Rail Conditions of Travel set out the circumstances in which a person can board without a valid ticket: where there are no facilities to buy, or they are not working; where a TVM will not accept your preferred method of payment (card or cash); or where you have a disability and facilities at the station are not accessible to you. They do not provide an explicit assurance that you can board a train if you cannot get the *type* of ticket you want. If 'pay on board' is to become standard for some products, then there will need to be explicit permission that people can do this without penalty. This will require very clear signage and notification at the station – both in terms of when you can board without a valid ticket and when you can't; and what products/services you can access on board and what you will need to purchase at the station. It should also lead to a change in the National Rail Conditions of Travel. We have raised these concerns and have seen no mention of such in your proposals, just broad commitments to ensure that all rail revenue protection staff are aware of the changes to ticket retail and able to apply this knowledge when dealing with cases of ticketless travel. Without such assurances there is a risk that people become liable for a penalty fare or that they will buy the wrong (potentially more expensive) ticket rather than take the risk of boarding the train without a ticket.

We note that some products (such as Advance Purchase fares, seat reservations, and Rover/Ranger fares) could be made available on TVMs in future. However, this could not take place until the middle of next year and is still subject to funding – this is not guaranteed. There is also the question of how they would be provided until any upgrade – we do not think online or buy on board to be a sufficient 'day 1' mitigation.

There are also products and services that will not be available from a TVM or on board the train. We are particularly concerned that passengers will not be able to buy Railcards at stations (other than at the five Customer Information Centres outlined above). Railcards are a key way in which rail travel is made more affordable. While the majority may be fulfilled online, sales figures show there is still demand for them at stations – not everyone is willing or able to buy them online. If rail is to remain fully inclusive, it is unacceptable to offer only online options for these products or to require people to travel to the nearest Customer Information Centre.

There is also no clarity on how cash refunds will be made at your stations in future – The National Rail Conditions of Travel state that if you bought your ticket with cash you are entitled to a refund in cash. Other remaining issues include cycle reservations and being able to change a booking/ticket.

We also remain concerned about passengers who need to use cash. We acknowledge that there will be a TVM that accepts cash at each station, and that products could be purchased on board the train. However, and as mentioned, it will not be possible to buy a Railcard for cash or get a refund in cash. It is also unclear how passengers without bank accounts would receive compensation if their train is delayed. We acknowledge that these issues exist today at stations where there is no ticket office. However, the TSA terms of reference refer to 'improvements in quality of service' and it is hard to see how removing cash services from more stations could be seen as an improvement.

Finally, we note the industry wide initiative for the national concessions for disabled people which could involve people eligible for the concession being provided with a Disabled Persons Railcard instead. We believe that discussions on this need to involve the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people/representative groups. In the meantime, these concessions would still need to be made available to passengers.

Conclusion

Objection 1: We are not satisfied that passengers will retain widespread and easy access to key products at the station.

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now.

Recommendation 1: That should the industry seek to replace the national concessionary fares for disabled passengers, EMR supports calls for, DPTAC, disabled people and representative groups to be involved in the development of any alternative.

ii) Retail capacity at the station

While staff may be able to help people use a TVM, in most instances they do not retain the ability to actually issue a ticket. Therefore, removing ticket windows reduces the number of 'points of sale' resulting in higher demand on the remaining TVMs.

We note your assurance that existing TVMs will be able to cope with the projected increase in demand arising from closing ticket windows. Your assurance is predicated on a 15% switch to digital channels. It can be easy to use TVMs for a simple purchase but not for a more complicated journey,

especially where there are restrictions on which operator or route you can take. We believe that those transactions could easily take much longer, especially given the people 'displaced' from ticket windows will also potentially be those less familiar with TVMs and how to use them.

We remain concerned at the lack of a queuing time metric at 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. The introduction of a robust, enforceable, metric and reporting regime for TVM queuing (based on the existing standards at ticket office windows) would create a review mechanism – if queues exceed the targets then action would need to be taken (such as issuing staff with hand-held ticket devices so that they can 'queue bust' and/or installing extra TVMs). There is also a strong argument for putting these results into the public domain, for example in Customer Reports. There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct.

Conclusion

Objection 3: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

iii) Retail staffing hours

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

We note that retail staffing hours have changed at all stations. However, the ticket office windows are still proposed to close with multi skilled staff providing retail support at TVMs.

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

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

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in providing assistance and support. In the original proposal many stations would have seen a significant reduction in staff

presence. This would have had an impact on disabled passengers' ability to 'turn up and go'. While in many cases staff on the train would have been able to assist passengers on and off the train, they were unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

"As an autistic person I rely on the ability of ticket office staff for directions or assistance."

"Stations are very dangerous places for visually impaired people to navigate alone. I'm a visually impaired person living in Nottingham and regularly travel by train with my guide dog."

In addition to widespread concern in the consultation about a reduction in staffing at stations, passengers were also worried that when stations were staffed they may find it more difficult to find staff. Currently passengers know to approach the ticket office – it is the focal point. We understand that guide dogs are trained to go to the ticket window, and it is also the case that ticket windows have induction loops to help people hear.

"I'm a carer for my disabled daughter. We travel regularly to London to see her sisters. We need assistance on and off the train. I would think twice about travelling with less staff about to help."

Your proposals (as revised) stated:

- You have "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 (for example, less than an hour a day). Therefore staff will continue to be available at stations to deliver booked and un-booked assistance for the same hours as today.
- Your proposed multi-skilled staff will be positioned at designated Welcome 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). Welcome Points "are to be developed for every location where a staffed ticket office is closed. This will be a clearly recognisable information display at all locations, ideally located next to or adjacent to TVMs and Help Points. Welcome Points will all share core characteristics, although the size/scale of the Welcome Point will vary based on the station category. The concept of a Welcome Point could apply across all types of stations following the consultation process."
- The provision of assistance will be a priority for your multi-skilled hosts.

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this should ensure that there is a member of staff present at the same times as now. This should mean assistance is available on the same basis as it is now.

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

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

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

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

It is an important principle that people affected by a proposal should have a say on that proposal: “nothing about us without us”. Welcome Points were not explained as part of the consultation so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. To that end we believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of these Welcome Points.

The Welcome Point concept is a fundamental change for passengers, especially disabled passengers, so it is important that they work in practice and that passengers have confidence in them. It was clear from the consultation that accessibility, particularly the availability of staff to provide assistance, was a key area

of concern. Therefore we believe they must be piloted/trialled to establish what works best at different types of stations and how passengers react to them. Proposals on ticket offices would need to await the outcome of these pilots.

Conclusion

Objection 4: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 5: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

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

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

“I will be adversely affected because I won’t be able to ask for information or get advice.”

“I often travel to visit friends. Staff at my station explain to me the best way to go about it, to lose that information would affect my confidence to travel.”

Your proposals (as revised) stated:

- You have “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 (for example, less than an hour a day). Therefore, staff will continue to be available at stations to provide information for the same hours as today.”
- Multi-skilled staff will be provided mobile phones. If a customer requires a printed travel itinerary, this will still be able to be provided.

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

Conclusion

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

6d Passengers feel safe at a station

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

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

“Has the potential to significantly increase risks to personal safety. Of great concern to those travelling alone including those with visible or hidden disabilities.”

“I want to feel safe when I’m at the station and knowing there is staff around is reassuring.”

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

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

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

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

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

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

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

Your proposals (as revised) stated:

- You have “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 (for example, less than an hour a day). Therefore staff will continue to be available at stations to provide information for the same hours as today.

- The Department for Transport and British Transport Police have agreed that you should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.

We acknowledge the commitment to maintain the original staffing times. We believe that this should ensure the same level of reassurance to passengers as now. Indeed, in some instances, having more a more visible staff presence (for example, staff out from ticket windows) could improve perceptions of safety.

Conclusion

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

Recommendation 2: There should be no implementation of proposals until the crime and vulnerability audits mentioned above have been completed and any necessary actions have been implemented.

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

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

"It will have adverse effect on my ability to make sure I have the right ticket and not penalised if I don't."

Your proposals (as revised) stated:

- You have "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 (for example, less than an hour a day). Therefore, if a customer is unable to obtain a ticket the multi-skilled staff will be able to provide advice and reassurance." EMR propose to "ensure that all rail revenue protection staff are aware of the changes to ticket retail and able to apply this knowledge when dealing with cases of ticketless travel. Staff will be given enhanced access to industry information to validate the status of retail services, such as TVMs at a station level, to assist with understanding a passenger's situation. This will provide reassurance for customers who have not been able to purchase a ticket at their origin station that they will be given the opportunity

to purchase their ticket if asked by a member of staff, be that on board, at their destination or by revenue inspection teams.”

- National Rail Conditions of Travel (NRCoT) already provide the conditions under which a passenger may travel without a ticket without incurring a penalty fare.
- Your Guards and Revenue Inspectors currently operate in an environment where many stations are unstaffed or have ticket offices open only in the morning. You state that EMR will use “NRCoT as the basis for dealing with ticketless travel, as it is today, and the application of Penalty Fares scheme with the clear obligation on the customer to buy a valid ticket before boarding.”
- You state that “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).”

We again acknowledge that reverting to original staffing hours will address many of our concerns as there will still be someone available to provide advice and support for passengers.

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

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

However, as already covered above, there are a number of tickets that may no longer be available from a station. The National Rail Conditions of Travel make no mention of allowing you to board in situations where you cannot get the ticket you want. And yet some of the mitigations presented are to buy the ticket from a ‘hub’ station or onboard the train.

We note your statement that signage is compliant with the Penalty Fare Scheme rules and considered appropriate. We think that if ‘pay on board’ is to become standard for some products then there will need to be explicit permission that people can do this without penalty. This will require very clear signage and notification at the station – both in terms of when you can board without a valid ticket and when you can’t; and what products/services you can access on board and what you will need to purchase at the station.

Conclusion

Objection 6: We are not yet satisfied that adequate safeguards exist to prevent passengers being be penalised if they cannot buy the ticket they require from the station. This applies to all EMR penalty fare stations.

6f Passengers can continue to use facilities at a station

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

Your proposals (as revised) stated:

- You have 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 (for example, less than an hour a day). This means that facilities will be available for at least the same period as before.
- It also means that staff will continue to be available to respond to any alarms (for example, the alarm in the accessible toilet) for the same hours as today.

Conclusion

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

6g Other issues

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

i) *Future regulation*

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

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

Your letter of 27 September raised the possibility that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – protects those customers most in need of in-person support and assistance. It stated:

- The ATP process is formally regulated and enforceable by the ORR as part of an operator's licence.

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

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

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

Conclusion

Objection 7: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

ii) Timing of mitigations

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

Your letter of 27 September referred to two stages of mitigation. You stated that, 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.”

As we set out earlier in this letter, we are not convinced that all 'day 1' mitigations will be sufficient. In particular, in how some products (such as Railcards and cash refunds) may not be available on day 1, especially for people who are unbanked or digitally excluded. This is already covered under objection 1 and 2.

Other mitigations have also been proposed around Welcome Points and crime and vulnerability surveys. We have already set out in the sections above the importance of these being addressed prior to any changes at ticket offices – see objections 4 and 5.

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

Conclusion

Recommendation 2: It will be essential that there is a clear, co-ordinated communication plan to inform passengers should any changes go ahead.

iii) Monitoring and review

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

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

Conclusion

Objection 9: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics. must include queueing time metrics.

7. Assessment for each station

Objection 1: We are not satisfied that passengers will retain widespread and easy access to key products at the station.

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now.

Objection 3: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

Objection 4: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 5: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

Objection 6: We are not yet satisfied that adequate safeguards exist to prevent passengers being penalised if they cannot buy the ticket they require from the station. This applies to all EMR penalty fare stations.

Objection 7: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

Objection 8: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

Station	Decision	Grounds for objection (see text above)
Alfreton	Objection	1, 2, 3, 4, 5, 6, 7, 8
Beeston	Objection	1, 2, 3, 4, 5, 6, 7, 8
Boston	Objection	1, 2, 3, 4, 5, 6, 7, 8
Burton On Trent	Objection	1, 2, 3, 4, 5, 6, 7, 8
Chesterfield	Objection	1, 2, 3, 4, 5, 6, 7, 8
Corby	Objection	1, 2, 3, 4, 5, 6, 7, 8
East Midlands Parkway	Objection	1, 2, 3, 4, 5, 6, 7, 8
Hinckley	Objection	1, 2, 3, 4, 5, 6, 7, 8
Kettering	Objection	1, 2, 3, 4, 5, 6, 7, 8
Kidsgrove	Objection	1, 2, 3, 4, 5, 6, 7, 8
Long Eaton	Objection	1, 2, 3, 4, 5, 6, 7, 8
Loughborough	Objection	1, 2, 3, 4, 5, 6, 7, 8
Market Harborough	Objection	1, 2, 3, 4, 5, 6, 7, 8
Mansfield	Objection	1, 2, 3, 4, 5, 6, 7, 8
Melton Mowbray	Objection	1, 2, 3, 4, 5, 6, 7, 8
Narborough	Objection	1, 2, 3, 4, 5, 6, 7, 8
Newark Castle	Objection	1, 2, 3, 4, 5, 6, 7, 8
Oakham	Objection	1, 2, 3, 4, 5, 6, 7, 8
Skegness	Objection	1, 2, 3, 4, 5, 6, 7, 8
Sleaford	Objection	1, 2, 3, 4, 5, 6, 7, 8
Spalding	Objection	1, 2, 3, 4, 5, 6, 7, 8
Stamford	Objection	1, 2, 3, 4, 5, 6, 7, 8
Wellingborough	Objection	1, 2, 3, 4, 5, 6, 7, 8

**Transport Focus
31 October 2023**

Annex

1. Total objections received for East Midlands Railway
2. Transport Focus's letter of 6 September
3. EMR's response to that letter

Annex 1: Total objections received for East Midlands Railway

Station specific objections:

Alfreton	117
Beeston	332
Boston	59
Burton On Trent	135
Chesterfield	340
Corby	97
East Midlands Parkway	99
Hinckley	68
Kettering	201
Kidsgrove	214
Long Eaton	202
Loughborough	245
Mansfield	53
Market Harborough	310
Melton Mowbray	104
Narborough	152
Newark Castle	22
Oakham	130
Skegness	39
Sleaford	132
Spalding	116
Stamford	115
Wellingborough	239

Total 3521

Transport Focus also received the following objections about stations which were not included in East Midlands Railway's consultation on changes to ticket offices:

Derby	410
Leicester	355
Lincoln	173
Nottingham	921
Sheffield	644

In addition to the 3,521 station specific objections listed above Transport Focus also received 29,163 responses objecting to East Midlands Railway's proposals in general.

Total East Midlands Railway objections: 35,187

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

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

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

Boston	46
Chesterfield	885
Derby	51
Kidsgrove	604
Leicester	50
Loughborough	360
Melton Mowbray	170
Nottingham	191
Sheffield	952
Skegness	110
Wellingborough	137

We received copies of the following online petitions:

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

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

We are also aware of the following online petitions:

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

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

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