

Linda McCord, Senior Stakeholder Manager
Dan Taylor, Senior Policy Advisor
Transport Focus

28 September 2023
Sent by email

RE: Ticket offices: emerging issues and clarification questions

Dear Linda and Dan,

Thank you for your letter of 6 September regarding our proposals to change how tickets are sold at our stations. I would like to begin by thanking you and your team for your constructive challenge over the past few months. I appreciate that the questions in your letter are both to inform Transport Focus' assessment and to help respond to those who were in contact with your organisation during the local public consultation.

As you know, the aspiration behind the proposals and a key outcome should they be taken forwards, is for our station colleagues to be available where customers will benefit from them the most. With a growing number of customers shifting to digital/smart payment options, ticket offices aren't used as they were in the mid-1990s. I know that Transport Focus agrees in principle with the proposition that having our staff on the concourse alongside our customers is likely to be of benefit, both in terms of customer service and efficiency, thereby providing a better service for customers than today.

Our conversations and your letters have taken a holistic view spanning retail alongside wider concerns such as customer service, access to facilities and, of course, accessibility, all of which is vitally important to us.

With this in mind, my team and I have responded to all your questions in the enclosed document. I would like to draw your particular attention to the positive changes made to address three key concerns, raised during the public consultation period. They also make a material difference to some of the questions you have asked. These positive changes are:

1. Increased staffing hours

Whilst we note that under the Ticketing and Settlement Agreement (TSA), we must consult all proposed changes to our ticket offices with yourselves, we understand the public have raised matters about general station staffing as part of their feedback. We value that feedback and have considered it in making our responses, noting that general station staffing hours do not form part of the TSA.

We initially proposed a reduction in overall staffing hours at 23 of the 186 stations affected by these proposals, where there was a reasonable case on efficiency grounds and our retailing data suggested this was viable. After listening to the invaluable public input during this consultation and carrying out a further comprehensive internal review, we are proposing to make the following amendments:

- At 15 of the 23 stations (Arundel, Bexhill, Billingshurst, Carshalton, Cheam, Cooden Beach, Coulsdon Town, Emsworth, Ford, Ham Street, London Road, Moulsecoomb, Pulborough, Rye and Warblington), we are now proposing to keep the existing hours of retailing assistance exactly the same as they are today. We believe this is a positive response to concerns raised.



- At eight stations (Angmering, Chichester, Crawley, Falmer, Hove, Portslade, Shoreham-by-Sea and Worthing), we remain confident our proposal meets the needs of our customers including regarding accessibility assistance and the need to buy tickets. Here, those needs would be met by the second member of staff who is always rostered to be on board every Southern train. In addition, at Crawley, the existing Mobile Assistance Team based at the station will now provide assistance at either end of the day, outside of retailing assistance hours.

We feel that this is a positive change that has been made in direct response to your valued feedback. This influences the answer to some of your clarification questions, for example around the use of Mobile Assistance Teams.

2. Retaining retail facilities at all stations within this proposal

Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a hub station.

While we expect this equipment will be used increasingly rarely, as the industry makes more of these specialist tickets available to buy online and at TVMs, it will provide a useful additional day one mitigation while changes are made, and customers become used to the new environment.

This influences the answer to some of your clarification questions, for example around product types that as of now are not currently available via a TVM.

3. Enhanced accessibility meeting point

Responding to the feedback received in the consultation, we have reviewed all stations within this proposal and identified locations where, either due to the staffing arrangements or the physical layout of the buildings and/or platforms, it might not be possible to immediately see or locate a member of staff from the main entrance. We now propose introducing an enhanced accessibility meeting point which is being developed at a national industry level. It will be compatible with hearing loops with its core functionality being to notify a member of staff at the station that a customer who needs assistance has arrived. We believe this mitigation will represent a significant enhancement over both our current and the previously proposed arrangements.

As we continue to develop our plans, we would be happy to discuss them further and consider additional feedback from you. We look forward to continuing to work closely with you in the weeks ahead.

Yours sincerely,



David Coates

Programme Lead

Govia Thameslink Railway



Govia Thameslink Railway

Transport Focus: Clarification questions and responses

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

Adequacy of retail facilities

Q: The proposal data, showing ticket sales between 30/01/22 and 13/3/22 is now quite dated. Could you advise us how this data compares with that from sales figures this year/a more recent period?

A: The dataset we've presented is taken from a 'clean' period that postdates the pandemic and – crucially - is unaffected by industrial action as well as major engineering work and public holidays. Based on sampling and our real-time information, the 2022 data set prepared for this programme still presents a representative view of ticket office use at GTR, but is recognised to likely over-report ticket office use. This is because it does not account for the increased use of eTickets following both infrastructure investment (i.e. now at all stations and at all gates) and continued and accelerating channel shift to online. As a result, ticket office sales have declined in relative proportion to approximately 9.5% by value as of August 2023. Given the above, we feel the data we have supplied is appropriate to the proposals being made.

Q: 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?

A: We have considered TVM capacity at each of our stations in drawing up these proposals. Across the network as a whole, our data tells us we have TVMs in excess of demand, modelled on one transaction per 90 seconds for an inexperienced TVM user.

Our proposal is based on both customers of the ticket office and TVMs today increasingly switching to digital methods, whether barcode, contactless, smart card or otherwise. We believe, based on available evidence, that customers are likely to switch to digital tickets rather than TVMs. This has been the experience across the industry where ticket offices have closed in the past. Our staff will be trained to walk along the queues and help customers buy digital instead. As a result, over time we expect TVM usage to either remain at similar levels to today, or as is more likely, decline.

Q: 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?

A: Further to the previous answer, we have the recent experience as a previous change under Schedule 17, the full closure of Harringay ticket office from 2020. Harringay is a reasonably busy station with approximately 450,000 sales per annum of tickets with Harringay as an origin point. Following the closure of the ticket office, TVM usage is now at approximately 7,000 sales per annum, an approximate 2% decline relative to before ticket office closure. The trend at Harringay has been for increasing sales growth over time with a shift towards digital tickets, particularly Contactless.



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

A: From our assessments, we know that the busy summer season is offset by a weakening of the commuting and business market. While leisure customers may potentially require additional support with ticketing, unlike the commuter market, loadings are more evenly spread across the entire day. In addition, tourism destinations such as London Victoria or Brighton are already equipped with larger fleets of TVMs, while our seasonal marketing is geared towards online, particularly eTickets. As a result, while a factor, it is relatively marginal.

Q: Has any assessment of the location of TVMs been carried out - are they in the right place to meet demand?

A: TVMs are located either as part of the ticket hall (if open 24/7) or where the ticket hall is not open 24/7 at a nearby accessible location in immediate proximity, with larger stations often then featuring secondary sets of TVMs. We are however open to consultation feedback which suggests that the location or orientation of a TVM can be tweaked. We will ensure that staff are deployed in the best place to support customers, relative to the location of TVMs. This will vary depending on station layout and infrastructure.

Q: What mitigations do you intend to put in place to help staff 'queue bust' at busy times?

A: Staff training will feature approaching customers in a TVM queue and advising customers where alternative products such as Contactless or eTickets may be faster and more appropriate for the journey they wish to make. Where mobile ticketing devices are available, these can be used.

Q: How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place? We understand that it is not GTR's intention to provide Station Host staff with handheld ticket machines. Should the retail arrangements at individual stations prove inadequate will that decision be reviewed?

A: As today, GTR will evaluate its retail proposition through internal review such as our SQR system, retail sales data and customer insight channels, as well as external survey work such as that carried out by Transport Focus. As evidenced by our continued investment in eTicket infrastructure, it is in the railway's commercial interests to make retail as frictionless as possible and we will monitor introduction carefully, such as wait times for TVMs. Where mobile ticketing devices are available, these can be used.

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

A: There is no impact. All retail channels are already set up to offer the best value National Rail through fare based on the information provided by the customer.



Usability, functionality and accessibility of Ticket Vending Machines (TVMs)

Q: Transport Focus provided list of product types & 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?

A: The table below presents fare types with a commentary on current availability via TVM and expectations on change in the future with reference to planned industry developments where applicable.

Transport Focus provided list.

| Ticket description | Current status at TVM | Change expected | Detail |
|---|---|---|--|
| Advance fares | No | Yes | Industry-wide TVM scheme for introduction |
| Season tickets (longer than weekly) | Yes via smartcard as of now. Expansion to eTicket imminent. | No | Magstripe vending via TVM not currently supported due to risk of receipt loss by customer and need to associate with unique customer I.D which is currently provided by photocard number to enable customer service such as refunds. Smartcards are supported at all TVMs alongside eTicket options. |
| Railcard Sales (National and regional) | No | Potential – subject to wider industry discussions | Currently available online, with 75% now sold online. Larger stations available. |
| Car park tickets | N/A | N/A | Main car parks are ANPR – telephone available as alternative to online. |
| Refunds | No | Potential – subject to wider industry discussions | Online / customer relations refund process supports tickets not purchased online |
| National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion) | No | Yes | Industry-wide scheme for introduction |
| Boundary Zone add-ons | Yes | N/A | |
| Staff travel discount | No | No | Available online |
| Buying tickets in advance rather than on the day of travel | Yes | N/A | |
| Tickets for travel that do not involve the 'host' station | Yes | N/A | |



| | | | |
|---|-----|---|--|
| Seat reservations | No | Potential – subject to wider discussions | GTR does not use seat reservations |
| Changing a booking/tickets | No | No | Available online or via larger station |
| Use of rail vouchers | No | Potential – subject to wider discussions | Industry-wide scheme for introduction |
| Use of rail warrants | No | Potential – subject to wider discussions | Industry-wide scheme for introduction |
| Ranger and Rover tickets | No | No | |
| Plus Bus tickets | No | Potential – subject to wider industry discussions | |
| Ferry connections | No | No | |
| Group save | Yes | N/A | |
| Off-peak purchases before the off-peak begins (i.e. before 09.30) | Yes | N/A | |
| Cycle reservations | No | Potential – subject to wider industry discussions | GTR does not use cycle reservations |
| Photocards for season tickets | No | Yes | Industry-wide scheme |
| Scholar tickets | No | No | |
| Sleeper bookings | No | No | |
| CIV tickets for connections with Eurostar international services | No | No | |

Other non-listed products & fares

| Ticket description | Current status at TVM | Change expected | Detail |
|--|-------------------------------|--|--|
| Child flat fares | Pre-purchased collection only | Potential – subject to wider discussions | Currently available for collection at TVM when bought online in combination with an adult fare. |
| GTR specific local schemes <ul style="list-style-type: none"> Bedfordshire & Hertfordshire Council Council Concessionary Scheme Easit discount | No | TBC | Alternatives to be discussed with scheme owners including moving schemes online where they are not already in place. |



| | | | |
|--|--|--|--|
| <ul style="list-style-type: none"> • Gatwick staff discount • Luton Airport staff discount • East London NHS Foundation • Luton Borough Council • Unizone • Cambridgeshire Student Connect | | | |
|--|--|--|--|

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

A: Yes. The industry is working on introducing new TVM functionality such as Advance Fares, which subject to funding and supplier timescales are expected to be introduced from mid to late 2024.

Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.

Q: Will staff be able to access retail equipment (such as the original ticket office equipment, a ‘staff mode’ option on the TVM, or a handheld ticket machine) to sell tickets not available from the TVM?

A: Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.

We have a supply of handheld devices that can be used where needed. These do not form part of our proposals, but will be used, especially during initial implementation, to support with queue busting as customers become used to the change.

Q: How will passengers access these products and services in future?

A: Similar to the proposal for our larger stations, all GTR stations will now retain one ticket office retail (TOMTIS) machine. It would be used by staff, on request, for customers requiring the few specialist tickets that cannot be provided by TVMs or digitally. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.



Q: How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets?

A: There are no changes to ticket types available for purchase proposed as a direct result of this programme, although there are examples where simplification is a mitigation to the issues raised in the consultation, for example, withdrawing photocard requirements. Fare simplification remains Government policy under the William-Shapps Plan for Rail but is not within the remit of these proposals.

Q: How will disabled people who cannot use a TVM purchase a ticket? And how will this be made obvious to passengers?

A: Many disabled people can use TVMs which are designed to comply with the DfT's strict code of practice for accessibility, which includes height requirements for wheelchair access and we work with our suppliers to ensure TVMs are as accessible as reasonably possible. We recognise, however, that for some people it is more difficult, depending on the individual's disability. For those who are unable to use TVMs or ticket offices today, people will still have the option of using online / mobile due to the greater compatibility with accessibility software.

For those who cannot use any of the methods above, we'll still have staff on hand to offer ticketing assistance using our machines with a broader range of training than today. We also have an existing Accessible Travel Policy where disabled people who are unable to purchase a ticket can buy one onboard or at their destination. This policy will be updated and maintained once final proposals have been confirmed.

If a disabled passenger would be best supported by their ticket being issued through a ticket office retail (TOMTIS) machine then that will remain possible.

Q: 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)?

A: As today staff are expected to be in close proximity to TVMs and to approach customers who may be having difficulties, and it will be part of their training to proactively look for customers requiring support.

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

A: This is not planned.

Q: 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.

A: TVMs are located either as part of the ticket hall (if open 24/7) or where the ticket hall is not open 24/7 at a nearby accessible location in immediate proximity. We are however open to consultation feedback which suggests that the location or orientation of a TVM can be altered.



Q: We are aware that some groups of disabled passengers are more likely to have a need to use cash when purchasing tickets. Are there TVMs that accept cash at accessible (step-free) locations at each station with existing partial/full step-free access between station entrance and the platform?

A: A TVM that accepts cash is always either part of the ticket hall that contains the existing ticket office, or in very close proximity in an accessible location. The exceptions are Brookmans Park and Essex Road, which as today, do not accept cash. No change is therefore proposed on today in any location.

Q: What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs?

A: The TVM contract is structured against average TVM availability across the station estate over a rolling 13 period (4-week) time frame and has been reviewed given the proposals. Under the contract, we expect an average engineer response and resolution within 24 hours of a reported fault. Importantly however, some of the more common faults that can result in a TVM not accepting cash (e.g. a jam) or a screen calibration issue can be addressed by our station colleagues through what we call “fingertip maintenance” – in effect, similar to the fault clearing processes many large office printers will get users to complete. While there will clearly be some variation between stations, as a general principle – the proposed multi-skilled role is intended to increase the proportion of, and in many cases the hours of availability of staff with the skills and training to keep TVMs in service relative to today. Consumables will remain a station staff responsibility.

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

A: We would be happy to consider this either temporarily during implementation or, if it can be deemed as adding value, for longer. Given that this proposal involves customer behaviour change, introducing set standards would be inappropriate before a reasonable period has elapsed, although the existing standard of five minutes for ticket offices at peak times is potentially a reasonable starting point once changes have bedded in.

Paying by cash

Q: 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?

A: For UK payments as a whole, cash has declined from 62% of transactions in 2006 to 14% as of 2022 and is expected to decline to 8% within the next nine years according to UK Finance. Based on this, and the relatively high transaction value of rail tickets, cash does not account for a significant volume. As a result, GTR's existing TVMs have sufficient cash handling capacity for the expected volumes.

Subject to consultation with our trade unions, the multi-skilled role will incorporate training on TVM maintenance including responding to a fault with the cash equipment such as a jam.

Q: 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 passengers about this?



A: It is the same as today. All proposal stations except Essex Road and Brookmans Park have at least one TVM that takes cash and if that isn't working then there are processes in place as per the National Rail Conditions of Travel, section 6.1 that allow our customers to travel and pay at the earliest opportunity.

Q: How will passengers with cash be able to buy the products listed above in relation to TVMs

A: All proposal locations except for Brookmans Park and Essex Road accept cash. There is importantly therefore no substantial change on today. Furthermore, at point of implementation or soon after (see answer referring to TVM upgrades) we anticipate the vast majority of walk-up fares being available at TVM.

With walk-up fares sold via TVM, this scenario is expected to only apply to season type products where either a customer is travelling for several days - e.g. a Brighton "Unizone" quarterly ticket, or is completing a journey with multiple stop-off points, e.g. a Rover. In this scenario a customer would approach a member of staff to use the TOMTIS equipment, or if out of hours, travel to a larger station as they would do today. As described, these larger stations have been set by geography and location on the network, so that any medium distance journey will involve travelling via at least one.

Digital switch over

Q: Do you have any evidence showing how many / what proportion of people will move to digital if ticket offices are closed?

A: Following the installation of eTicket readers to our gatelines and UK smartphone penetration now at 89% of the UK population as of Spring 2023, we expect the trend towards digital ticketing to continue to accelerate. Without further change of the type proposed by this programme, digital and smart tickets already account for approximately 70% of journeys on the GTR network.

In the London area, with near 100% digital and smart ticket coverage, our ticket offices usually account for approximately 1-3% of sales depending on location. This therefore represents a base level of current need for the ticket office, either due to the need for in-person support, or products not currently available online or via TVM. We expect the latter to be rapidly narrowed further by industry level changes to make further tickets available online or via TVM.

GTR has access to a number of case studies that demonstrate how people switch to digital when ticket offices close. We would be happy to discuss this with you on request.

Q: Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?

A: We have run campaigns to shift people towards digital for a number of years and currently have a campaign marketing the installation of eTicket readers at all gatelines across the network. Following the installation of eTicket readers to our gatelines and UK smartphone penetration is now at 89% of the UK population as of Spring 2023, we expect the trend towards digital ticketing to continue to accelerate - with digital ticketing already accounting for approximately 69% of journeys on the GTR network.

We therefore expect sales to naturally decline to similar levels as at our London ticket offices - e.g. 1-3% of sales, with this representing a base level of current need for the ticket office. We expect this gap to be further narrowed by industry level changes to make further tickets available online or via TVM.



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

A: Our EIA identifies that there may be some customers who cannot move to digital. This is an important rationale for our proposed ticketing assistance hours to provide face to face support and for the availability of TVMs with support for cash transactions. For disabled customers we are also retaining our existing ATP commitment on supporting disabled people to travel if they are unable to purchase a ticket.

We are also retaining TOMTIS at all locations to the same hours as today.

Q: 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?

A: We do not anticipate a decline in revenue, with the 9.5% of sales via our ticket offices expected to switch to other channels. From a revenue perspective, the proposal will release staff members able to be more visible at gatelines and by TVMs, and thereby acting as a deterrent, while it is also noted that the current demographic of people which use ticket offices are less likely to fare evade. It's worth noting many UK stations do not have ticket offices and the majority are not open full time, typically oriented towards commuting as it stood in 1995.

GTR has access to a number of case studies that demonstrate how people switch to other channels when ticket offices close. We would be happy to discuss this with you on request.

Q: 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?

A: This will not be standard equipment, however all stations will retain fixed TOMTIS ticket office retail machines at point of implementation.

Q: The GTR-wide EIA talks about the need for staff training to include support for those unable to purchase their car park tickets digitally, using station TVMs. Prior to the consultation, it was our understanding, from GTR, that passengers would always have the ability to pay for their car parking by telephone if not confident/able to use online payment methods. Can you confirm that that option is being maintained under the proposals?

A: Yes we can confirm this, there is no change is proposed on how this works today. APCOA will retain telephone support for car parking.

Availability of staff to provide help and advice

Q: What retail training will be provided to Station Hosts on the ticket/product range, to ensure they can provide expert assistance necessary to navigate the complex fares system, and ensure passengers buy the right ticket?

A: Our ticketing office staff have a vast knowledge and we want to ensure that as well as creating a more varied and interesting role, we continue to support our customers with high quality advice.



As a result, this will be further developed if and when proposals are taken forwards. Appropriate training will be provided to ensure staff are able to advise customers where required on the most cost effective option for their journey.

Q: How comparable will this be with the training previously given to ticket office staff?

A: Training will be developed using our current materials for ticket clerks as a baseline, whilst creating a wider role with a broader emphasis on all forms of customer service.

Q: How will the hub station proposals operate and what level of staffing will be in place at these stations?

A: All stations will now retain a TOMTIS ticket office retail machine so the concept of hubs is no longer relevant. We expect this equipment would remain in situ while ticket types currently only available from a TOMTIS machine are steadily made available from either TVMs or digitally, depending on the product type. This equipment will continue to be available for use by our staff for the times it is available today, avoiding the need for a customer to travel to a larger station.

The concept of the hub model was identical to all other GTR stations in that the primary purchase route will be digital such as Contactless, eTicket or smart card, followed by TVM. If a customer is unable to use either method, a staff member will be available to complete the sale.

Q: What rationale was used for determining which stations were to be included in this ‘interim arrangement’?

A: This is no longer relevant – please see answer above.

Q: How do you intend to brand these stations so that passengers understand their role?

A: This is no longer relevant – please see answer above.

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

A: Our proposals on staffing levels have been based on current demand and as a result, we believe they are designed to meet the needs of our customers. This will continue to be assessed and monitored if proposals are taken forwards.

Q: 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?

A: Following consultation input, at stations where it is possible that a member of staff may not be immediately available, for example due to the layout of the station or if single staffed then we are committing to enhancing our accessibility meeting points with a method of notifying a member of staff that a customer is on the premises and awaiting assistance.

We believe that staffing levels are sufficient not to need queuing arrangements, based on customer demand and travel patterns. Our staff are trained to assist people in the appropriate order depending on their need. Each station will undergo a risk assessment to determine that the right level of staffing is available to safely undertake their duties and meet the needs of customers.



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

Q: When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?

A: Accessibility has been a primary focus when making these proposals as is maintaining the ability to turn up and go.

There are eight stations where station staffing hours are proposed to be reduced (noting only five of these are proposed to see a small reduction when compared to current Schedule 17 hours). At these, there is an On Board Supervisor on every train to step on to the platform to provide assistance as today. At Crawley, the existing Assistance Team based at the station will now provide assistance at either end of the day, outside of retailing assistance hours.

Q: 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?

A: As today, support at stations is not proposed to be available outside of staffed hours, except where existing Mobile Assistance Teams are available. For boarding assistance, as today an On Board Supervisor / Conductor will step off the train at each station stop to identify customers on the platform requiring assistance and where a boarding ramp may be helpful - examples include a wheelchair user, a visually impaired person, parents with buggies or elderly people.

Q: Are there any GTR stations served by DOO (Driver Only Operation) trains that would see an increase in the amount of time that station staff are not present?

A: Further to changes in our proposal, there is only one station, Crawley, where this would apply. Using weekdays as the example, station staff are proposed to be present until 22:30. The last scheduled train service is at 23:55. Between 22:30 and 23:55, assistance will be provided by the Mobile Assistance Team which is based at Crawley itself.

Q: GTR has previously indicated that its existing Mobile Assistance Team (MAT) will not be expanded beyond the current stations served. However, in several Equality Impact Assessments (EIA) for stations not served by the MAT there is reference to 'Mobile Assistance' being a possible mitigation. Can you confirm that there aren't plans to increase the number of stations served by the Mobile Assistance Team as part of the ticket office proposals?

A: No, there are no proposals to extend MATs, with the exception of the nighttime availability at Crawley as referenced in the previous answer.

Q: 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?

A: Taxis provide no part of our proposals. As today, wherever possible, we aim to ensure that customers can travel by train for as much of the journey as practicable. In some cases (such as a disabled customer



with reduced mobility being unable to travel due to the station being inaccessible) we may provide a free taxi (accessible, if required) between the inaccessible station and the nearest or most convenient accessible station as a reasonable adjustment.

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

A: We would continue to provide assistance in line with our Accessible Travel Policy commitments with evaluation through mystery shopping, customer feedback and the ORR's regulatory role.

Q: How will people summon help if staff are not there?

A: As today, for those stations that are unstaffed, this will be via station help point, freephone or text message to our central accessibility team.

Q: What assurance that rostered station hosts will always include someone not medically restricted or locally agreed to ensure accessibility support will be available?

A: This is something that we already manage today and there is no reason to anticipate a change in approach as a result of this proposal.

As today, we will meet our commitments through our Accessible Travel Policy including providing boarding ramp assistance where required.

Q: 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? What additional mitigations can be taken to ensure the safety of visually impaired passengers?

A: Almost all stations served by GTR have tactile paving. Just four remain to be fitted out at the time of writing.

Outstanding stations are: Arlesey (installation to commence in September 2023), Netley (completion expected in September 2023), Watton-at-Stone (completion expected late October 2023) and Hertford North (in Network Rail planning process)

Q: 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?

A: We would continue to provide assistance in line with our Accessible Travel Policy commitments. As today, station staffing levels are based on assisted travel volumes and staff will continue to be trained to prioritise assisted travel above wider customer service. It is also important to note that at the majority of locations, while ticket office staff may provide the initial welcome for assisted travel and any ticketing assistance required, it is more often the gateline, platform or on-board teams who provide boarding support. Therefore in the round, this proposal will increase the proportion of staff involved in supporting accessibility.

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



A: Staff are trained to prioritise in order: safety, security (e.g. anti-terror), accessibility, and then customer service, meaning in practice that accessibility is always the first priority after preventing customers from coming to harm.

We also believe that at larger stations, these proposals will represent an improvement with more staff available proportionately to provide more rounded support, rather than specifically ticketing.

Q: How will staff at the station, and on the train know if passengers need help to board?

A: As today, by being proactive in identifying customers who may require additional support and asking them, by being approached, or by facilitating an existing request for booked assistance.

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

A: With regards to accessibility, please see the next answer.

Q: How will people summon help if staff are not there?

A: Following consultation input, at stations where it is possible that a member of staff may not be immediately available, for example due to the layout of the station or if single staffed, then we are committing to enhancing our accessibility meeting points with a method of notifying a member of staff that a customer is on the premises and awaiting assistance. This is being developed in coordination with RDG, recognising the importance of a consistent approach between different operators.

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

A: Induction loops are incorporated into the design of help points. We are evaluating the need for induction loops elsewhere in the station, noting that the existing ticket office induction loop is primarily a mitigation for the sound blocking effect of the security glass.

As described above, we are also proposing the incorporation of an induction loop into the enhancement of the accessibility meeting point.

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

A: As today, any failed assistance will be investigated thoroughly by our accessibility team. Following the model used by our safety team, the objective of the process, led by a senior GTR manager, is to identify the root cause and introduce measures to reduce the risk of it happening again.

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

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

A: No change planned on today as this information is displayed outside of the ticket office - e.g. a leaflet rack, poster of local travel information. In the future, should ticket office spaces have a different use, these locations may change to an alternative prominent area of the station.



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

A: All GTR staff have a company issued mobile phone which is used to provide customers with advice and support and where appropriate, staff will coach customers on how to use their own mobile phones to access information online. We are not proposing printing facilities for routine use, with pens and paper for bespoke, or pre-printed leaflets / forms as today for routine information representing a faster to use alternative. Also, the TOMTIS ticket office retail machines have the ability to print.

Q: At some stations, that are currently staffed throughout the day, there are no help points available to passengers. At those stations, such as Crawley (where the staffing hours are to be reduced) will Help Points be installed?

A: There are three in-scope stations that will not have help points by March 2024: Chichester, Portslade and Crawley. At all stations there is an advertised freephone telephone number and text service for our accessibility team. As today, the rostered On Board Supervisor will step-off the train at Chichester and Portslade to confirm if any passengers are awaiting assistance, while at Crawley, assistance will be provided by the on-site Mobile Assistance Team.

GTR is exploring options on installing help points at these three locations.

Q: Has an assessment been undertaken on the location of Help Points to ensure that they are accessible to all passengers? For example, are there any stations where the closure of the ticket office will reduce step-free access to the Help Points? Are there any plans to position help points in concourses or station entrances to avoid passengers having to travel along platforms or over bridges to summon help?

A: The potential closure of ticket offices will have no impact on access to help points. Station staff will still be available to assist under these proposals in the vast majority of cases.

Q: A significant number of stations EIAs (Equalities Impact Assessments) suggest that the current signage for Help Points is inadequate and needs to be improved. When will work be undertaken to address this?

A: At present, stations with on-board staff or where assistance is provided by a Mobile Assistance Team at present have help points labelled as "Emergency and accessibility" whereas stations with first to last staffing are labelled as "Emergency" following the rationale that accessibility is a purpose for the station staffing. We are however planning on updating the labelling of all help points to "Emergency and accessibility" in the next few months.

Notably, station staff will still be available to assist under these proposals in the vast majority of cases. Therefore, the proposed closure of ticket offices will not lead to an increase in help point use.

At all stations, 'Welcome Posters' provide a freephone and text number to the same support team, in addition to posters at OBS or Conductor route stations. These numbers are also provided on new signage at all MAT served stations, within our Making Rail Accessible Brochure (available to download in Easy Read, Large Print and Audio versions) and our videos (Making Rail Accessible: What's available at the station).



Q: What are your existing processes and Service Level Agreements for monitoring that help points are working, and the response time to repair faults?

A: Help point calls for either information or emergency are to be answered within 30 seconds. Planned general audits are carried out by our station managers, with staff also conducting spot checks at a minimum of a daily frequency as part of wider station security checks.

Each help point is also tested as part of GTR's service quality regime with two primary SLAs - the first relates to the 30 second response time, for which GTR has seven days to correct any issue. The second relates to defective help points, for which GTR has, under its service quality regime 14 days to correct any issue.

Q: What commitments can you give to ensure that there will be a working Help Point at each station after the switch off, of 3G and ISDN lines?

A: Help points will continue to be available. We are updating infrastructure as required for the eventual planned switch off of legacy technologies such as ISDN or 3G.

Q: What are the service quality regime standards for answering help point information calls (i.e., Within how many seconds)?

A: Within 30 seconds for both information and emergency calls.

Q: What are the arrangements for monitoring how quickly control respond to passengers using the emergency button to seek assistance?

A: The GTR Control team is resourced to answer an emergency call within 30 seconds which is tested via our SQR regime.

Q: What arrangements will be made to strengthen GTR's ability to respond to the potential increase in Help Point calls? How will you monitor/report time taken to answer help point calls / proportion not answered?

A: As the proposals do not involve a significant change relative to the number of existing GTR stations, it is not anticipated to drive a significant increase in the volume of help point calls. This will however be monitored, with staffing increased to maintain the current 30 second standard if deemed required. Emergency help point calls are currently managed across three desks at the control centre with GTR investing in additional IT to both quality check response calls and expand the number of desks which can be involved in calls if this is required in the future. Information calls are handled by the wider National Rail enquiries call centre.

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

Q: 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 additional measures will be taken in respect of those journeys involving travel on DOO services/connections with operators?



A: There are no proposed changes - none of the potential scenarios that could be encountered under this proposal are different to what might be experienced today at either an unstaffed station, or a station where the ticket office is closed and the National Rail Conditions of Travel are already designed with these scenarios in mind.

Q: 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?

A: As today, our staff are trained and expected to act discretely, but it is reasonable to expect a customer to explain why they were unable to purchase a ticket.

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

A: As today, signage is the responsibility of our station management teams and industry-level materials are updated using established processes, for example as demonstrated by the recent change to penalty fares. As part of any future implementation, notices and signage will be updated and / or replaced to reflect new arrangements.

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

Q. What mitigations have been designed to keep facilities open, when there are no rostered staff at a station? How reliable/robust will they be?

A: There will be no change to the availability of facilities as a result of these proposals. If staff hours do change, we will make alternative arrangements to open or close facilities to the same operating hours as today.

Q. When will the proposed mitigations be implemented?

A: From point of introduction on a location by location basis

Q: 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?

A: This is an issue that we manage today, for example through the use of CCTV. We will maintain maintenance and facility checking as today and our current cleaning regimes will remain in place.

Q: We understand that alarms for 'accessible toilets', and in some cases lifts (e.g., Ham Street), are often routed to staff in ticket offices. Is this the case at GTR stations and, if so, what changes will be made to ensure passenger's calls for assistance are answered?

A: As with Help Points, many lift calls are already routed to our Control team at Three Bridges ROC, with toilet calls typically monitored locally. If and where proposals are taken forward, local arrangements will be adjusted, with any alarms re-routed accordingly and risk assessments carried out prior to implementation.

Issues relating to whether passengers feel safe at the station

Q. Have you liaised with the British Transport Police about the impact on staff and passenger security at stations?



A: We have a close working relationship with BTP and work with them as partners on a daily basis. While we do not envisage these proposals will impact on security, we will be working closely with the BTP if proposals are taken forwards including a risk assessment and safety validation process.

Q. Where station staffing hours are to be reduced, what additional/new measures are being put in place to ensure ASB doesn't become a problem? The info provided on the GTR spreadsheet seems to confirm what measures are already in place. If yes, is the funding for these confirmed?

A: CCTV, BTP and Rail Enforcement Officer support on request is funded and in place. As today, GTR has experience in managing anti-social behaviour at unstaffed and partially-staffed locations. We already have Travel Safe Officer teams working across our network and work closely with BTP on intelligence-led policing and patrols. We recently strengthened our partnership with the BTP for another year by signing a collaboration agreement, committing both organisations to work together towards shared objectives.

Q. Where stations are impacted by popular local or national events e.g., Eastbourne, Falmer, and Lingfield, what provisions are made to increase staffing to help manage higher volumes of passengers at these times?

A: As today, GTR provides additional staffing during significant events, for example during football matches in the Brighton area. These proposals will enhance this ability by introducing a greater proportion of multi-skilled staff. This will continue as it does today.

Q. What additional pool of cover will be available for sickness/holidays/absence etc? If staff numbers are considerably lower, ensuring cover for a (predictable) level of expected absence will be important

A: As today and across all GTR roles, the staff establishment size is designed to allow for sickness, holiday leave and similar. A significant attraction of the new role is greater flexibility through multi-skilling which will increase our ability to move staff to cover temporary gaps in coverage.

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

A: As today, station CCTV is designed to help ensure the station is safe and secure, including at times when it may already be unstaffed. A specialist team manages and monitors live CCTV at Control.

Q. Are all GTR Help Points connected to CCTV so that Control can see passengers calling for help?

A: All CCTV is available live to the Control team. GTR is working to expand the number of stations where activating the help point also connects the control desk with a live feed to the CCTV, rather than the operator needing to manually access the station CCTV as they do at present.

Other issues:

Q. Once GTR has had opportunity to respond to the feedback it receives and adjust the EIAs accordingly will it commit to publishing them for each station? We believe this will help passengers understand what the proposals mean for the stations they most frequently use



A: As today, information on station staffing, facilities and accessibility will be updated on the central databases that supply our station information online and at posters and across the wider rail industry. This will also include updating accessibility specific information such as via our ATP if necessary. The EIAs remain internal tools that are regularly reviewed; the updated information and changes on the ground are the outputs for customers.

Future changes

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

A: No station that is staffed today will be unstaffed under our proposals and our proposals are designed around the needs of our customers today.

The existing set-up of the Ticketing and Settlement Agreement reflects the railway as of 1995 and provided protection for customer's ability to purchase tickets, in the context of the Ticket Office being overwhelmingly the main sales channel three decades ago. Subsequently, with ticket office sales now accounting for roughly 9.5% of sales and following the example of London, expected to decline further as digital ticketing expands, the focus on in-person retail is no longer as relevant.

That notwithstanding, station staffing plays an important role in safety, security, accessibility, revenue and customer service, many of which are themselves either regulated, legal or commercial requirements or priorities. While we should be expected to continue to evolve to suit changes in customer behaviour, society and technology, it is unrealistic to expect those priorities to change dramatically in the near future.

The intention in the future is not to replicate the historical regulation of ticket office hours, but instead focus on the output of those hours: protection of support for customers, especially disabled customers.

As a result, there is an existing link as highlighted through consultation responses in supporting accessible travel. A potential mechanism to achieve this in the future is via our Accessible Travel Policy (ATP) and those of other TOCs.

Unlike the TSA, the ATP is formally enforceable and regulated via the ORR as part of our operating licence and already commits GTR to providing assistance in a range of scenarios such as when train services have on board staff and when they do not.

Changes to an operator's ATP are controlled, with alongside the ORR's determination, operators required to demonstrate engagement with local stakeholders:

"At the time of submission, operators must confirm that they have sought and considered feedback from local groups such as their passenger panel, accessibility forum and local user groups, as appropriate."

The ORR also stipulates broader consultation requirements including consultation of Transport Focus and London TravelWatch.

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

A: As above.



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

A: As today, through updates to the station welcome poster and online information that is available on National Rail Enquiries and across all our websites.

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

A: There will be no change to current arrangements, with hours of staff availability advertised externally. We will continue to use a roster system that meets these agreed hours as today.

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

A: As today and across all GTR roles, the staff establishment size is designed to allow for sickness, holiday leave and similar. A significant attraction of the new role is greater flexibility through multi-skilling which will increase our ability to move staff to cover temporary gaps in coverage.

Timing of mitigations

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

A: Depending on the issue in question, there may be two stages of mitigation, but these will always follow a "Day One" mitigation.

For all retail issues, the "Day One" mitigation of facilities available at larger stations will be in place, supplemented by TOMTIS at all locations. The intention is this is developed over time, for example - progressively more types of tickets becoming available online or by TVM through wider industry programmes. The intention is for the "Day 1" mitigations to act as a full mitigant to any specific issue, and therefore it is not seen as necessary to wait until a longer-term solution is in place before the ticket office closes but would also allow for wider station changes and arrangements that will assist with modernisation and efficiencies.

Q. 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?

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

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

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

A: The Rail Delivery Group has agreed in principle with the Department for Transport that funding support for the Retail Enhancements will be available. GTR has agreed with its DfT leads funding for GTR-level



mitigations. In both cases the release of this funding will be subject to the conclusion of the consultation process and the proposals going ahead.

There are three key areas of mitigation that DfT has agreed to fund:

1. Retail enhancements, allowing tickets sold in the ticket office to be bought either on a TVM or online. Furthermore, GTR will be funded to retain a TOMTIS ticket office retail machine at every station that currently has a ticket office
2. At 15 stations (Arundel, Bexhill, Billingshurst, Carshalton, Cheam, Cooden Beach, Coulsdon Town, Emsworth, Ford, Ham Street, London Road, Moulsecomb, Pulborough, Rye and Warblington), DfT has supported keeping the existing hours of retailing assistance exactly the same as they are today
3. DfT will principally fund the development nationally of an enhanced accessibility meeting point

Liaison with other operators

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

A: Engagement with other operators has been completed as part of the Ticketing and Settlement Agreement. Operators are in agreement.

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

A: Yes. Proposals at locations with Network Rail staff such as London Victoria have been designed with this in mind and no specific mitigations related to Network Rail are required.



Govia Thameslink Railway

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