

Govia Thameslink Railway's proposed changes to ticket offices (covering Great Northern, Southern and Thameslink): Transport Focus response

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

1. Introduction

This letter is Transport Focus's formal response to Govia Thameslink Railway's (GTR) proposal to change ticket office opening hours at regulated stations operated by Great Northern, Southern and Thameslink. It outlines responses received during the public consultation which began on 5 July 2023 and then sets out Transport Focus's conclusions.

Transport Focus recognises that the way many passengers buy their ticket has changed, with increasing numbers choosing to buy online, use apps or Pay As You Go contactless payment. We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 12 per cent of sales on average.

We acknowledge that the proposal was designed to respond to this shift in customer behaviour, with the aim of bringing staff out from ticket offices to better meet customer needs. It is important to stress that Transport Focus is not against the principle of 'bringing staff out from behind the glass'. Our conclusions below are based solely on the specific proposals received for each station and the potential impact on passengers.

2. Executive summary

GTR published details of its original proposal on 5 July 2023. The public consultation on this ran until 1 September. Transport Focus received 40,171 representations objecting to GTR's proposal and 40 representations supporting GTR's proposal.

Transport Focus used information provided by GTR 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 several clarification questions based on our initial analysis and from the main themes seen in the public responses at that point. The response and subsequent correspondence proposed some enhancements to the original proposal.

Transport Focus acknowledges that GTR has made substantial improvements to its original proposal. Your specific station proposals meet many of the criteria set by Transport Focus around staffing and access to products and services. However, we still have a number of industry-wide generic issues which give continued cause for concern. These are specific to all operators and, while we are willing to continue engaging with the industry on these, they have not yet been resolved. As a result we must object to proposals at **all** 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 about how and where to locate staff assistance on arrival at a station, GTR proposed that Welcome Points will be developed as an initial focal point that provides any customer who needs support and/or advice a place to start their journey. We think there is merit in this idea but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the Welcome Point and needs assistance and whether induction loops would be fitted.

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

- Queuing standards at Ticket Vending Machines

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for Ticket Vending Machines (TVMs). This could be based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be.

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 expectations not be correct.

- Retail capacity
 - We have concerns over the retail capacity at the following stations: Burgess Hill, Buxted, East Grinstead, Lewes, Lingfield, Littlehampton, Moulsecomb, and Letchworth.
 - We believe there is still a need for a staffed retail point at Brighton station.
 - We believe that any reduction in staffing at Eastbourne station is likely to have a negative impact on disabled passengers due to the high volume of passenger assist requests. This is identified as a risk in the Equality Impact Assessment (EIA) undertaken at Eastbourne.

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 clauses 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 – in other words, objecting to the proposals by all train companies. In addition, we also received a total of 257 petitions.

There were two specific campaigns launched which generated a large number of responses; one by the RMT union which involved emails and ‘postcards’, and another via the workers’ rights network, Organise, which was via email. While the majority of these responses followed a standard template some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received 40,171 objections to GTR’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 40 representations supporting GTR’s proposal to close ticket offices out of a total of 741 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; i.e. 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.

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. GTR replied on 28 September answering these questions. These letters are attached as Annex 2 and 3. After that we wrote to ask GTR further clarification questions on the 6 and 13 October, which were answered on 11 and 19 October respectively. The additional replies provided by GTR are attached as Annex 4 and 5.

The overarching intention of GTR's original proposal was to close all the ticket offices at the stations being consulted on, merging current ticket office and gateline teams, to resource a new role of Station Host. This is a front of house, multi-functional role that includes provision of ticketing assistance, travel advice and assistance for disabled passengers. The proposals made clear that other existing station roles, such as platform staff or despatch, were not set to change.

At many stations that had both gateline and ticket office teams, the combined number of staff from those two teams was to be reduced. At 23 stations the proposals saw a reduction in the staffing hours at the station and/or the number of staff reduce. For some stations this might have meant that there was no longer a staff presence for considerable parts of the day during the week, and/or on weekends.

Although planned to formally close, in respect of the regulated schedule 17 hours, a small number of stations were to act as 'hub stations', where the ticket office equipment would be retained in order for staff to be able to sell those ticket types not available online, or at Ticket Vending Machines (TVMs). These stations included: Brighton, Chichester, Eastbourne, Haywards Heath, Horsham, Huntingdon, King's Lynn, and Worthing.

Although there were some variations across the network, there were three other scenarios outlined within the proposals:

- Stations where the ticket office was to close, but the existing opening hours retained; staffed by the new Station Host role. For example: stations such as Biggleswade, Crowborough, Dormans, Downham Market, Hitchin, Plumpton, Southbourne, West Worthing and Wivelsfield.
- Stations where the ticket office was to close, but the proposed hours exceed the current number of staffed hours served by the ticket office staff. For example: at Burgess Hill station passengers would be able to seek ticketing assistance from Station Hosts for a greater number of hours, when compared to current ticket office hours (assuming the new Station Hosts are able to provide the same level of advice). Station hosts would effectively adopt the hours previously worked by gateline staff: Monday to Saturday 05:15 – 01:15 and 05:50 – 01:10 on Sundays. Similar examples were seen at Haywards Heath and Hassocks.
- Stations where the ticket office would close, the proposed hours exceed the current ticket office opening hours; but represent a reduction when compared to the current hours worked by gateline staff. To be clear, at these stations the current schedule 17 regulated hours would be maintained. The proposed staffing hour reductions were outside of those regulations.

Following further discussion with Transport Focus, and listening to public feedback, GTR's letter of 28 September made some significant changes to those proposals:

Staffed hours

- At 15 of the 23 stations that were to see a reduction in overall staffing (Arundel, Bexhill, Billingshurst, Carshalton, Cheam, Cooden Beach, Coulsdon Town, Emsworth, Ford, Ham Street, London Road, Moulsecomb, Pulborough, Rye and Warblington) you proposed to keep the existing hours of retailing assistance the same as they are today.

- At the remaining eight stations (Angmering, Chichester, Crawley, Falmer, Hove, Portslade, Shoreham-by-Sea, and Worthing), the needs of passengers, including those requiring accessibility assistance and help to buy tickets would be met by the second member of staff always rostered to be on board every Southern train serving those stations. In addition, at Crawley, the existing Mobile Assistance Team based at the station would provide assistance at either end of the day, outside of retailing assistance (Station Host) hours. Following further questions from Transport Focus, in your letter dated 19/10/23, you confirmed that at four of those stations (Angmering, Chichester, Hove and Portslade) you propose to increase the staffing hours by thirty minutes on weekdays. This has been undertaken in response to feedback, and a review of customer journey numbers and revenue protection.
- You confirmed that at all GTR stations under the consultation there is now no reduction in retail staffing hours.

Retailing

- All GTR stations would now retain one ticket office retail machine (TOMTIS). This would be used by staff, on request, for customers requiring specialist tickets that cannot be provided by TVMs or digitally. It is expected that this equipment will 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 GTR staff for the times it is available today, avoiding the need for customers to travel to hub stations. This is to provide a day one mitigation while changes are made, and ‘customers become used to the new environment’.
- As all stations would retain a TOMTIS machine, and maintain the ability to retail all ticket types currently available, the concept of hub stations was withdrawn. You subsequently confirmed in your letter dated 19/10/23 that the TOMTIS system is due for an update, meaning it can be used in a mobile form – effectively a ‘tablet and dock’ in layman’s terms. The benefit over the existing TOMTIS being that it will enable staff to use the equipment face to face with customers, in the station concourse area, and by doing so be more visible to customers. The new equipment has agreed funding from the Department for Transport, is being tested, and is subject to consultation with union colleagues. Roll out is anticipated in the new year (2024) and expected to be complete in Quarter one 2024.
- You explained that the TOMTIS equipment ensures that there is no change in the ability at any station to support all ticket types or related customer service functions such as refunds, including the ability to use cash.

We acknowledge that you have made significant improvements to your original proposal in response to our clarification questions, and feedback from the consultation.

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:

“The ticket office at Eastbourne station provides a valuable service to all potential users and particularly those who do not have a smart phone. Ticket machines are not as flexible or provide the advice needed by many customers, particularly those who do not use the train services on a regular basis. It is easy to find and obvious which will be more difficult with roaming staff. Standing somewhere on the concourse with other people milling about it no substitute to the existing personal service. The existing service can provide not only ticket sales but reservations and other advice which will be more difficult with roving staff.” Passenger from Eastbourne

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 at 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, but also 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:

“If buying a train ticket was simple, then there might be an argument to move all ticket purchasing online, but the current situation with multiple train operators and multiple ticket types is very confusing. As a result, whenever I am planning a journey which is anything other than a very simple local return I always go to the Brighton ticket office, where the incredibly helpful and experienced staff always help me find the best ticket. The loss of such a resource would be a real blow.” Passenger from Brighton

“This change will impact on me a lot – I'm 66 and am trying to travel by train more rather than drive for environmental reasons. As I live near to Gatwick Airport lots of people from outside the town use the ticket office as they need travel advice but it is often closed outside peak times. Given the absurd complexity of the UK rail ticket system we need ticket offices to advise on the best travel method/ticketing options. The machines can't do this and are sometimes out of order, this means you have to board a train without a ticket in a Penalty Fare Area!” Passenger from Burgess Hill

“I wanted to go from Ashted into London (at peak time) and back out to Windsor yesterday, then back from Windsor to Ashted in off-peak time today. Kevin (ticket office staff) quickly worked out the best way to do that. If I had had to do it myself I'd have been fiddling with the ticket machine for at least 5 minutes. He knows how to optimise the system – I do not... It struck me that the ticket machines are okay for simple, regularly made trips – but as soon as complexity is introduced this becomes hard. I believe that closing the ticket offices will be entirely inconsistent with the current complexity of tickets (peak, off-peak, evening out, groupsave, single/return, different routings, advance etc etc), or indeed with the increase in the penalty fair.” Passenger from Ashted

Useability of Ticket Vending Machines

GTR's original proposal was based on passengers increasingly switching to digital methods, be that barcode, contactless, smart card or otherwise. However, in the short to medium term we believe that closing ticket office would place a greater reliance on sales from Ticket Vending Machines (TVMs).

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

addition, not all TVMs can offer the same range of products and services as ticket offices.

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

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

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

“I'm disabled using machines and holding my credit card and stick I would very likely drop my credit card, bag or stick. The whole process would fluster me and would probably discourage me from travel. Therefore it would be excluding me and deprive me of my independence.” Passenger from Angmering

“I travel quite regularly on trains from Flitwick into London. I have tried to use the ticket machines in the past but I find them, if working, too complex and difficult to use. I see people struggling to use them and that results in a buildup of people queuing to buy tickets. Buying a ticket from a ticket office is easier, simpler and often more helpful from the staff manning the window. I am eighty years old and the closure of ticket offices will undoubtedly reduce the number of occasions when I travel by train.” Passenger from Flitwick

“...The TVM cannot sell Rover tickets – currently these are available from the ticket office. Northern operated TVM's do now sell these tickets – so why not GTR?? Where it is not possible to buy/collect a ticket due to problems with the TVM there needs to be a cast iron guarantee that no passenger will ever be issued with a penalty fare or prosecuted.” Passenger from Dormans

Retail capacity

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

“Barnham has a small concourse. Queues at two machines already cause congestion at peak times. Sometimes the queue stretches out onto the pavement. Ticket office staff provide quick advice on routes and ticket options and prices. This is appreciated by those who may be visually impaired; do not have a smartphone or a bank/credit card. The new proposal should be considered on the space available at individual stations. Although reasonably tech-savvy, as an old person I prefer to buy tickets at the ticket office rather than online to avoid the inevitable hassle of password issues.” Passenger from Barnham

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.

“As I only pay by cash at a ticket office and can’t use one of those machines I think I would give up using a train.” Passenger from Seaford

“Value the ability to pay here by cash. This is especially important with a group booking so that everyone can pay rather than one person having to do this and then everyone transferring the money, which is inconvenient.” Passenger from Barnham

“I recently had to exchange rail travel vouchers for cash at the ticket office as they made an error on a delay repay claim and initially sent the wrong amount and was told the only way I could get it was from a ticket office. How would this be dealt with if the ticket office is closed.” Passenger from Portslade

Product range

Currently ticket offices provide access to a full list of products and services. TVMs do not sell/serve all of these. For example, GTR’s 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 (for other operator’s services),

allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

“Buying Unizone season tickets as these can ONLY be bought from a ticket office. As well, the employee who has worked there since I have lived here (10+ years) is always incredibly helpful in ensuring I get on the right train and can find the cheapest ticket. Putting him out of a job would leave my entire community unable to gain comprehensive and amazing travel advice.”

Passenger from Barnham

“I have an Easit card which entitles me to a 15% discount on all Southern Rail tickets, peak and otherwise. The ticket machines at the stations do not recognise this Easit discount card and I have to buy a discounted ticket from station office. If the ticket office is closed, I have to buy a full price ticket and then go back again when open for a refund.” Passenger from Barnham

Major stations

Responses from passengers on the proposals for major stations have highlighted a particular concern about how they will still get expert support and advice at particularly busy stations. At these locations passengers perceive that ticket offices are still very well used.

“The Brighton ticket office almost always has a queue, often extending well outside the ticket office building, so it's essential to be able to queue for the next available ticket clerk. If staff are only to be found on the station concourse, any effort to get help is likely to involve hanging around close to a staff member while they try to help someone else, which puts pressure on them and the other passenger and that some passengers will find intimidating (and which may mean that you get caught waiting for a staff member who is completely tied up with that other passenger for a long period, or who may be called away to deal with an urgent issue before they are able to deal with your enquiry). It's also essential, especially for passengers who cannot see well, that they know the place that they can go to find assistance. The ticket office is that place.”

Passenger from Brighton

“At present the ticket office is a focal point for any passenger seeking assistance, whether this is purchasing a ticket or seeking other advice regarding their travel arrangements or needs. It would appear that most people are able to identify where the ticket office is easily and make their way there for help. Although the plan is to reallocate ticket office staff to the platforms, it is unclear how easy it will be able to identify these staff in future and what sort of coverage there will be at stations with multiple platforms (a member of staff per platform?). There is also a queuing system for ticket offices. It is unclear how

platform-based staff will be able to manage multiple passengers who may approach them simultaneously with their queries and needs.” Passenger from Brighton

GTR’s proposals (as revised) sought to address these issues:

Ease of buying a ticket

- All GTR stations under consultation will retain or exceed the *retail* staffing hours set out in Schedule 17 of the Ticketing and Settlement Agreement. This means that staff will continue to be available to assist passengers with purchasing tickets for the same hours as today, or in some cases, longer than today.
- Where a ticket type is available online or by TVM, GTR staff in the first instance would be expected to show a customer how to access a product directly. For example, this could include demonstrating how to use a TVM to purchase a ticket discounted with a Senior Railcard. However, customers will not however be turned away or refused service.
- The retention of the TOMTIS machine means passengers will get access to the same products and services as now.
- At all except two stations (Brookmans Park and Essex Road) there is a TVM that accepts cash – located either in the ticket hall, where the existing ticket office is located, or in very close proximity, in an accessible location.
- Appropriate training will be provided to ensure that staff are able to advise passengers on the most cost-effective option for their journey. And that the current materials used to train ticket clerks will be used as a baseline for the new Station Hosts. Staff training will also feature approaching customers in a TVM queue and advising them where alternative products such as Contactless or eTickets may be faster and more appropriate for the journey they wish to make.
- Staff will be trained in “fingertip maintenance” of the TVMs, including responding to faults with the cash equipment, or screen calibration. The above training proposals are subject to consultation with the relevant trade unions.

TVMs

- As part of an industry wide project, GTR will introduce new TVM functionality such as the ability to retail Advance Fares. Whilst subject to funding and supplier timescales this is expected to be introduced from mid to late 2024.
- GTR’s Accessible Travel Policy allows a customer to board a train without a valid ticket if the ticket machine is inaccessible to them. This arrangement is already in practice across the network.

Retail capacity

- GTR has considered TVM capacity at each station. Across the network your data tells you that you have TVMs in excess of demand, modelled on one transaction per 90 seconds for an inexperienced user. You explain that your proposal is based on an increasing number of passengers switching to digital tickets. This has been the industry experience where ticket offices have closed in the past. Over time you expect TVM usage to either temporarily increase, or remain at similar levels, before declining as the shift to digital accelerates.
- The TOMTIS machines that will be retained at each station are due to be updated in the immediate future, converting the equipment to function as a tablet computer. This will make it mobile, allowing staff to use the equipment on station concourses – visible to passengers. Whilst subject to consultation with colleagues, the introduction across the GTR estate has funding approval from the department for transport and is expected to be complete in Quarter 1 2024.
- GTR also has mobile ticketing devices, called Envoy. This equipment is largely in place on the Thameslink and Great Northern network as well as with on-board crew on the Southern network. This equipment will support the introduction of these proposals, through ‘queue-busting’. This will be in use at stations that currently have a higher relative usage of the ticket office.
- On queuing times, you believe that a five-minute metric is a sensible starting point, and that you are committed to monitoring progress during implementation. In practice, once a very short amount of time has elapsed (for example, one to two weeks), you expect to take mitigating action if passengers still experience queue times significantly beyond five minutes. This could for example, involve using additional staff with mobile devices, and focusing efforts on approaching customers in the queue – ‘queue combing’, to invite passengers to use digital.

We are also aware that there are 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 those 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 retail staffing hours back to the original ticket office hours and that this will ensure that there is a member of retail staff present at the same times as now at stations; and that they will be trained to the same level as now. We also acknowledge that retaining the existing ticket office sales equipment will ensure that products not available online or from TVMs will still be available at the station, especially for those reliant on cash and/or who do not have access to the internet.

However, we remain concerned with the following:

i) Availability of staff assistance, cash purchases, and product range

We note your reference to the retention of the TOMTIS equipment being a temporary mitigation that would remain in place until suitable alternative mitigations are in place. We believe it is a basic principle that access is maintained for those who are non-digital and/or cash based. Any 'suitable alternative mitigation' would need to ensure this safety net is maintained and be subject to consultation prior to implementation.

GTR's proposal makes clear that the national concessionary tickets for disabled passengers will continue to be available to passengers at the station from the TOMTIS machines. However, we are aware that there is an industry-wide initiative to find an alternative method of providing these discounts. We understand the current proposal to be one that could see those eligible for the national concessions being provided 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. We would encourage GTR to support our calls for disabled people to be involved in the development of any proposal on the national concessions.

Conclusion

Recommendation 1: That DPTAC, disabled people and representative groups should be involved in any discussions to replace the national concessionary fares for disabled passengers with an alternative product.

Recommendation 2: SWR refer to temporary mitigations (for the unbanked and digitally excluded) remaining in place until 'suitable alternative mitigation' is found. We believe it is a basic principle that access is maintained for those who are non-digital and/or cash based. Any move from the 'temporary mitigation' must be conditional on this and be subject to consultation.

ii) Retail capacity

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 when the people 'displaced' from ticket windows will also potentially be those less familiar with TVMs and how to use them.

We remain concerned that at a small number of stations, the existing TVMs will not cope with demand at peak times. These are: Burgess Hill, Buxted, East Grinstead, Lewes, Lingfield, Littlehampton, Moulsecoomb and Letchworth.

Taking Burgess Hill as an example we can see that there are three TVMs, one at each entrance point to the station. Without knowing the passenger flow through the main ticket hall, it's easy to imagine a scenario where passengers arriving at the platform 1 entrance for London bound peak services, might face a long queue time in excess of the current ticket office waiting times.

At Buxted, there would be just one TVM to serve those passengers heading into London in the morning peak, with a relatively infrequent service compressing demand into a shorter time period.

Whilst the TOMTIS and Envoy machines can be used to alleviate any pinch points at TVMs, the absence of a firm queuing time metric leaves us nervous that some passengers will face excessively longer waiting times (than today) to buy a ticket.

We note your commitment to monitoring queue lengths during implementation. We agree this is important. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queuing at a ticket office. However, we believe there is a need for a more permanent, nationally agreed, 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 valuable review mechanism. There is also a strong argument for putting these results into the public domain, for example, in Customer Reports.

A firm commitment to such a queuing time metric would give assurance at those stations where there are larger volumes of ticket office sales to be absorbed by TVMs. It would ensure there is a formal mechanism to review sales volumes and, if projections were wrong, to increase retail capacity. Either in the short term, following implementation of the proposals, or in the future should footfall at a station substantially increase.

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. We have seen a wide range of estimates from operators. A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry expectations not be correct.

Conclusion

Objection 1: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

Objection 2: We have concerns over the retail capacity at the following stations: Burgess Hill, Buxted, East Grinstead, Lewes, Lingfield, Littlehampton, Moulsecomb, and Letchworth.

iii) Major stations

In our clarification questions we expressed concern about how the proposals would work at Brighton where sales volume and footfall are both high. Even with the predicted shift to digital, it feels like there would be a need for a large number of retail experts to help with complex ticketing, and the sheer volume of queries/sales. We also raised the practicality of how a more disparate system would work.

You felt this did not reflect your experience of operating major stations – where customers needed more support outside of retail, for example, information on alternative routes during disruption. You also suggested that users of the ticket office were a mixture of customers requiring advice and support and those that have joined the queue because it is in front of them. Those passengers really requiring the support of staff would be waiting, while staff were occupied with routine transactions.

We remain concerned, and of the view that there is a greater risk that a system reliant on roving staff will break down as people crowd around staff at TVMs or as they are walking somewhere to help another passenger. The potential lack of any obvious queuing system to get help with tickets could easily confuse and frustrate in equal measure – especially for someone new to the railway or a tourist. At major stations there are already staff available on the concourse and elsewhere at the station to provide passengers with information, accessibility assistance and other support.

At Brighton, the ticket office is not front and centre within the main concourse, it is to one side, away from the main entrance. It seems less likely people there are

joining a queue because it's in front of them and the TVMs are less visible. We think it reasonable to assume that those passengers seeking it out do so consciously because they're not confident, or able, to make purchases through other means. The overarching premise of the industry's proposed reforms is that ticket office staff are under-utilised, we do not think this is the case at major stations. We also note that many other train operators have proposed to retain a form of ticket office at major stations. We believe there is still a need for a staffed retail point at major stations such as Brighton.

Conclusion

Objection 3: We believe there is still a need for a staffed ticket office at Brighton station.

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 a significant 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.

"I am registered blind and regularly travel [various] routes. Without ticket offices and station staff, I cannot order tickets. I cannot see to use ticket machines (either paying for prepaid tickets or buying new tickets) without assistance. I do not have anyone I can bring to do this for me – I often travel on my own or with my partner, who is also registered blind. Closing ticket offices and reducing the number of staff at stations doesn't just reduce my ability to travel independently, it completely wipes out any hope I have of travelling." Passenger from Brighton

"As someone with dexterity and sight disabilities I rely heavily on dealing with people rather than a machine, and I really don't know how I will be able to buy my tickets in the future." Passenger from Angmering

“The staff at this station go above and beyond whenever I have to travel. I have a son with non-visible special needs and he can feel really overwhelmed when we use the station but the staff always make him feel so comfortable (the last time the lady at the ticket box even gave him one of her waters). They ALWAYS know which ticket is the best value and will get us where we want to go. I NEVER use the ticket machines as they are always wrong, more expensive, freeze and are confusing...” Passenger from Angmering

In addition to widespread concern in the consultation feedback 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, and get the help they need. 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.

Questions were also raised about the ability of multi-functional staff to ensure assistance would be provided at the busiest times. We therefore sought assurance that staffing levels would be sufficient, particularly at those stations with only one member of staff present.

Given the significant concerns of disabled passengers in the consultation feedback, we also asked whether there were any GTR stations served by Driver Only Operated (DOO) trains that would see an increase in the amount of time that station staff were not present.

In the original proposal we identified a number of stations without passenger Help Points which were staffed throughout the day. Of those stations, the intention was for a small number to see staffing hours reduced. As a result, we asked whether Help Points would be installed at those locations to provide passengers with a means of requesting help when staff weren't present.

“The idea that passengers' queries can be handled by former ticket office staff redeployed to wander around the station is nonsense. If the member of staff at Ashted is on the 'up line to London' platform and I am at the main station entrance by the 'downline' and I need help buying a ticket, what do I do? Shout across the tracks to the other platform?” Passenger from Angmering

GTR's proposals (as revised) sought to address these issues. They stated:

- 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, GTR commits to enhancing its accessibility meeting points with a method of notifying 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.

- Each station currently has a meeting point for those passengers who have booked assistance. At Brighton for example, the existing signed meeting point is in the main station concourse, next to the WHS Smith and in sight of the gateline. As today, the meeting point will be located in sight of where GTR staff can reasonably be expected to spend the majority of their time. The focus will continue to be on staff looking out for customers who might need assistance, as today, rather than expecting customers to find them. The updated training for the new proposed multi-skilled role will build on GTR's existing accessibility training to ensure that staff know how to seek out and approach those who may benefit from additional support.

GTR's plan is for these enhanced meeting points to be installed at all stations where it is theoretically possible for a member of staff to not be able to always see the Welcome Point.

- All stations within the GTR proposal are in scope for this enhancement, except for the smallest with simple station design/layout. At these there is limited to no possibility of staff being unable to see the meeting point for a significant period. You suggested Balcombe was one such station, where there is a single building on Platform Two.

In contrast, you described Streatham Hill as a station that would benefit from the Welcome Point enhancement. There, the gateline is above the two platforms, with the platforms accessed by lifts and stairs. Whilst staff will continue to spend the vast majority of their time by the gateline (the location of the meeting point), it is possible for them to be elsewhere unable to see it.

- The final design of Welcome Points will be developed with input and testing of disabled people, especially those with visual impairments.
- GTR would continue to provide assistance in line with its Accessible Travel Policy commitments. You pointed out 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, you feel this proposal will increase the proportion of staff involved in supporting accessibility.
- Using customer data, GTR's proposals have been built to place additional staff on duty during busy periods. In many locations this is between 06:00 – 10:00. At busier stations there will also be additional staff between 15:00 and 19:00. Most

assistance requests, as with all passenger journeys, are from medium and large stations such as Haywards Heath or East Croydon. These locations typically have platform staff, and stations which have very large volumes of assistance requests, such as London Victoria, have dedicated accessibility teams above the wider station staff establishment.

- There is only one station, Crawley, served by DDO trains that will see overall staffing hours reduced. Using weekdays as an 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.
- Help Points: 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 passengers to contact GTR's accessibility team.
- As today, rostered On Board Supervisors on trains serving Chichester, and Portslade will step-off the train to confirm if any passengers are awaiting assistance. At Crawley, assistance will be provided by the on-site Mobile Assistance Team.

We acknowledge the significant change to proposals brought about by the reinstatement of retail staff hours. At all stations within the consultation the original ticket office hours are matched by the new post of Station Host, and at most they match the longer hours currently worked by gateline staff. This means (with the exception of the eight stations mentioned below) there is a member of staff present at the same times as today. 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 staff available and do not have customer facing duties beyond the ticket office – we acknowledge that this could result in more physical assistance being made available. For example, helping disabled passengers with bags, guiding them to the platform and providing boarding assistance when necessary – in a way that is not always possible while in a ticket office.

Eight stations (Angmering, Chichester, Crawley, Falmer, Hove, Portslade, Shoreham-by-Sea and Worthing) will still see a reduction in *overall* staffing hours. We do not think passengers will view that reduction as an improvement to the customer experience. There appears to be an assumption that on-board teams provide an adequate alternative to the assistance offered by gateline, or ticket office, staff. Given the nature of their role and inability to leave the platform we'd question how on-board staff can fill the gap of 'missing' station staff. Particularly, when they only have the timetabled dwell time of the train in which to help. However, we

acknowledge that the hours being reduced are not related to ticket office staffing and are outside the current schedule 17 regulation and are not part of this consultation.

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 a lack of clarity and detail on this proposal. We sought industry-wide assurances on the following:

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

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

The enhanced 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.

Finally, we note that the Equality Impact Assessment (EIA) for Eastbourne station shows that there are a large number of passenger assists at the station, particularly when there are national/local events taking place in the area. It also suggests that if there were to be a reduction in staffing numbers there would be significant risk of passenger assists failing. It suggests the station would benefit from a dedicated accessibility team to manage bookings and assistance requests – as seen at stations such as Brighton. If the proposal at Eastbourne is to go ahead as planned the maximum number of staff at the station is to reduce. It would seem from the EIA that any reduction at Eastbourne is likely to have a negative impact on disabled passengers.

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.

Objection 6: Eastbourne station – We believe that any reduction in staffing at Eastbourne station is likely to have a negative impact on disabled passengers due to the high volume of passenger assist requests. This is identified as a risk in the Equality Impact Assessment (EIA) undertaken at Eastbourne.

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.

“Ticket office staff are able to help with practicalities of certain routes with heavy luggage, e.g., if going from Ashtead to Reading it's better to change at Guilford, which has step free access to platforms, rather than at Dorking Main/Deepdene which involves steep outdoor (and therefore slippery in rain) steps at Deepdene. The Ashtead ticket office staff know that; the ticket machine does not.” Passenger from Ashtead

Your proposals (as revised) stated:

- Staff will continue to be available at stations to provide information for the same hours as today.
- All GTR staff have a company issued mobile phone which is used to provide customers with advice and support. Where appropriate, staff will also coach customers on how to use their own phones to access information online. GTR

does not intend to provide printing facilities for routine use, for example, for printing journey itineraries.

- There is no plan to change the way that ancillary information, traditionally displayed in the ticket office (for example, timetable leaflets, accessible travel policies and local travel information) is displayed. Should ticket offices have a different use, the location for this information may change to an alternative prominent area of the station.
- Calls made from station Help Points, either for information or emergencies, are to be answered within 30 seconds. Planned general audits are carried out by GTR station managers, with staff also conducting spot checks at least once a day as part of wider station security checks. Each Help Point is tested as part of GTR's service quality regime with two primary Service Level Agreements (SLA) – 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.

As the proposals do not involve a significant change to staffing hours a significant increase in the volume of help point calls is not expected. 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.

Conclusion

We acknowledge the commitment to maintain staffing times at most stations. We believe that this should ensure the same level of access to staff for journey planning and disruption information as now.

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.

Recommendation 3: At the three stations that currently do not have Help Points and are to see a reduction in overall staffing hours – outside of the TSA schedule 17 regulations (Chichester, Portslade and Crawley) – we would urge GTR to secure the necessary funding to enable their installation. Whilst we note that each station has posters advertising a freephone number and text service for GTR's accessibility team there will be occasions when passengers turn to help points because there is no other option at the time.

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:

“As a young woman I cannot count the number of times I have been sexually harassed or even groped on the train or at the station. Having an open ticket office is one of the few situations which makes a station feel safe for a young woman like me as I can seek help from someone working...” Passenger from Rye

“Although I have only seen one major incident of anti-social behaviour, there are concerns in this area anti-social behaviour is getting worse. We have all seen video clips of youths throwing items on to the tracks at an unstaffed station. Whilst I would not expect staff to intervene personally, I would expect them to call the police.” Passenger from Angmering

“I cannot see well enough to use the ticket machines, and don't like getting a credit card or debit card out to tap to enter I could easily be mugged for the card, or drop it and lose it.” Passenger from Ashtead

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:

- Retail staff will continue to be available at stations to provide information for the same hours as today.
- GTR has a close working relationship with British Transport Police (BTP) and work with them as partners on a daily basis. While you do not envisage the proposals impacting security, you will be working closely with the force if proposals are taken forwards. This will include a risk assessment and safety validation process.
- 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.
- 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.

We understand that the Department for Transport and BTP have agreed that operators should complete a Security and Vulnerability Risk Assessment, developed in collaboration with BTP.

Conclusion

We acknowledge the commitment to maintain staffing times at most stations. We believe that this should ensure the same level of access to staff as now. Indeed, in some instances, there will be a more visible staff presence (in other words staff out from ticket windows) which could improve perceptions of safety.

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

Recommendation 4: At the eight stations that are to see reductions to staffing hours, typically towards the end of timetabled services, we would suggest GTR closely monitors those locations for any increase in anti-social behaviour and crime.

Recommendation 5: 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.

"There is a risk is that passengers will have to over-pay at a ticket machine to ensure they are covered for their journey, or might end up with slightly the wrong ticket and then get clobbered with a penalty fare by an over-zealous inspector. Either way, the train companies increase their revenue (which I suspect is the true aim of the proposal)." Passenger from Ashtead

"I am immensely worried that ordinary, law and rule abiding people are now going to be unduly punished for not having a valid ticket, or not being in receipt of a ticket due to not being able to purchase a ticket beforehand at the station, or having the incorrect ticket, as they have been forced to use an overly convoluted and difficult to use ticket machine." Passenger from Horsham

"The station offers services to London via two routes and two operators. Ticket pricing is complex, particularly around peak times. The on line sales are not specific enough to ensure compliance, hence risk of either not being able to catch a particular train (specifically leaving London), or of having to pay additional or penalty fares." Passenger from Pevensy and Westham

"The proposals add another level of anxiety (i.e. 'are we travelling with the right tickets or should we worry about incurring a penalty fare?') about travelling by train. As ever, with modern technology, the burden of risk ('have I bought the right ticket?') is being passed to the consumer, not the provider of the service, and the consumer faces the upset of travelling with constant low-level anxiety. The outcome will be 'use the car'." Passenger from Uckfield

Your proposals (as revised) stated:

- Most stations will see no change in overall staffing hours, and any reductions that do remain will fall outside the TSA schedule 17 regulated ticket office hours. All stations subject to the proposals will retain a TOMTIS machine, that can be used by Station Hosts. This means that the full product range currently sold by the ticket office will continue to be available at the station, at the same times as now or longer.
- GTR has an existing Accessible Travel Policy which allows disabled people, who are unable to purchase a ticket, to buy one onboard or at their destination.
- None of the potential scenarios that could be encountered under the proposals are different to what might be experienced today at either an unstaffed station, or

a station where the ticket office is closed. The National Rail Conditions of Travel are already designed with these scenarios in mind.

We again acknowledge that restoring all the current schedule 17 ticket office opening hours, and retaining the TOMTIS machines at each station, addresses our main concerns. There will still be someone available to provide advice and support for passengers, who will be able to sell the full range of tickets, at the same times as now or for longer.

Conclusion

We are satisfied that the proposal should not create any additional risks for passengers if they cannot buy the ticket they require from the station. **No objection.**

6f) Passengers can continue to use facilities at a station

In our letter of 6 September we expressed concern at instances where facilities such as waiting rooms, toilets (including accessible toilets), and lifts could/would be closed because there was no member of staff to open them. We were concerned that any changes to ticket retailing at stations should not 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.

“This proposal will affect both me, members of my family, and friends who use this station regularly. The ticket office is a source of useful information when going on a less common journey, and the automatic machines do not always work. Also the toilets are only open when the ticket office is open - the state of the toilets on the Southern trains is such that there are often no toilets working at all, and the toilet facilities at the station are therefore essential, especially for a disabled passenger like myself. I am objecting to any proposed closure of ticket offices.” Passenger from Hove

“In addition to this, when the ticket office is unmanned, the toilets are also locked so therefore the result would be a railway station with no toilet facilities at all.” Passenger from Pulborough

“Ticket office staff are my first point of contact when I arrive at the station. Having staff at a designated place means I know where to go if I require assistance, information, advice, or the unlocking of a facility such as a toilet or waiting room. If staffing levels were reduced or existing ticket staff redeployed to ‘multifunctional roles’, I would lose this crucial point of contact.” Passenger from Shoreham by Sea

Your proposals (as revised) stated:

- 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. There will be no change to the availability of facilities because of these proposals.
- 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 passengers have the same level of access to station facilities as now. **No objection.**

Recommendation 6: Where stations will benefit from increased staffing hours, that GTR review the ability to extend the opening times of facilities, such as waiting rooms and toilets.

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.

"I am totally against this plan. It is important to have physical presence at stations for security, customer service and assistance for the disabled and elderly. I do not believe the reassurances that platform staff will remain. I believe this will be the first step in those jobs being removed also and everything moved online. Maintaining manned ticket offices ensures this will not happen." Passenger from Barnham

"If staff have to be moved out of ticket offices to the concourse we need solid guarantees that these staff will not be made redundant at a later date to cut costs." Passenger from Reigate

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.

In your letter on 28 September you explained that 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.

Your letter also raised the possibility that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – would continue to protect those customers most in need of in-person support and assistance.

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 28 September referred to two possible stages of mitigation, ‘day one’ mitigations and longer-term mitigations. The intention is for the ‘day one’ mitigations to act as a full mitigant to any specific issue. You do not therefore think it necessary to wait until a longer-term solution is in place before the ticket office closes.

Your main ‘day one’ mitigations are to maintain retail staffing hours and the retention of the TOMTIS machines. The TOMTIS machine ensures access to all products/services currently available, including those reliant on cash and who have no access to digital channels. However, the TOMTIS equipment is only being provided on a temporary basis. We believe that this safety net must be retained, especially for those who are non-digital and/or cash based. Any future change should be conditional on such services being maintained, and on consultation.

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

See objections 1, 4 and 5: Passengers will need confidence that there are firm commitments in place for any mitigations in respect of accessibility, and retail capacity, before any changes could be made.

Recommendation 6: 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 expectations not be correct. This regime must be in place before any changes took place.

Conclusion

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

iv) Regulatory anomaly – Warblington station

On receiving the proposals for GTR stations, Transport Focus queried why no data had been provided in support of the planned closure of Warblington ticket office. In a subsequent email GTR explained that Warblington station has never had a ticket office at that location and that it did not understand why schedule 17 hours were in place. There are no staff at this location.

Whilst your decision to remove the schedule 17 hours is understandable (if there is no ticket office) we are unable to confirm that the proposal should go ahead without confirmation from the Department for Transport that this is simply an anomaly. The situation is not helped by the fact that both the Southern website and National Rail Enquiries advertise Warblington ticket office opening hours.

Conclusion

Objection 8: We object to the removal of Warblington station from TSA schedule 17 regulations until confirmation of the anomaly is provided by the Department for Transport.

Recommendation 7: If there are no staff, or ticket office, at Warblington station the station information provided to passengers on both the Southern website and National Rail Enquiries needs to be corrected so as not to mislead passengers.

7. Assessment for each station

Objection 1: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

Objection 2: We have concerns over the retail capacity at the following stations: Burgess Hill, Buxted, East Grinstead, Lewes, Lingfield, Littlehampton, Moulsecomb, and Letchworth.

Objection 3: We believe there is still a need for a staffed retail point at Brighton station.

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: *Eastbourne station* – We believe that any reduction in staffing at Eastbourne station is likely to have a negative impact on disabled passengers due to the high volume of passenger assist requests. This is identified as a risk in the Equality Impact Assessment (EIA) undertaken at Eastbourne.

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.

Objection 9: Object to the removal of Warblington station TSA schedule 17 hours until confirmation of the anomaly is provided by the Department for Transport.

Station	Decision	Grounds for objection (see text above)
Angmering	Objection	1, 4, 5, 7, 8
Arlesey	Objection	1, 4, 5, 7, 8
Arundel	Objection	1, 4, 5, 7, 8
Ashwell & Morden	Objection	1, 4, 5, 7, 8
Balcombe	Objection	1, 4, 5, 7, 8
Baldock	Objection	1, 4, 5, 7, 8
Barnham	Objection	1, 4, 5, 7, 8
Berwick Sussex	Objection	1, 4, 5, 7, 8
Bexhill	Objection	1, 4, 5, 7, 8
Biggleswade	Objection	1, 4, 5, 7, 8
Billingshurst	Objection	1, 4, 5, 7, 8
Bognor Regis	Objection	1, 4, 5, 7, 8
Bosham	Objection	1, 4, 5, 7, 8
Brighton	Objection	1, 3, 4, 5, 7, 8
Burgess Hill	Objection	1, 2, 4, 5, 7, 8
Buxted	Objection	1, 2, 4, 5, 7, 8
Chichester	Objection	1, 4, 5, 7, 8
Christ's Hospital	Objection	1, 4, 5, 7, 8
Cooden Beach	Objection	1, 4, 5, 7, 8
Crawley	Objection	1, 4, 5, 7, 8
Crowborough	Objection	1, 4, 5, 7, 8
Dormans	Objection	1, 4, 5, 7, 8
Downham Market	Objection	1, 4, 5, 7, 8
Durrington On Sea	Objection	1, 4, 5, 7, 8
East Grinstead	Objection	1, 2, 4, 5, 7, 8
Eastbourne	Objection	1, 4, 5, 6, 7, 8
Edenbridge Town	Objection	1, 4, 5, 7, 8
Emsworth	Objection	1, 4, 5, 7, 8
Eridge	Objection	1, 4, 5, 7, 8
Falmer	Objection	1, 4, 5, 7, 8
Ford	Objection	1, 4, 5, 7, 8
Goring By Sea	Objection	1, 4, 5, 7, 8
Ham Street	Objection	1, 4, 5, 7, 8
Hampden Park Sussex	Objection	1, 4, 5, 7, 8
Hassocks	Objection	1, 4, 5, 7, 8
Haywards Heath	Objection	1, 4, 5, 7, 8
Hitchin	Objection	1, 4, 5, 7, 8
Horsham	Objection	1, 4, 5, 7, 8
Hove	Objection	1, 4, 5, 7, 8
Huntingdon	Objection	1, 4, 5, 7, 8
Hurst Green	Objection	1, 4, 5, 7, 8
Ifield	Objection	1, 4, 5, 7, 8

Kings Lynn	Objection	1, 4, 5, 7, 7
Lancing	Objection	1, 4, 5, 7, 8
Letchworth	Objection	1, 2, 4, 5, 7, 8
Lewes	Objection	1, 2, 4, 5, 7, 8
Lingfield	Objection	1, 2, 4, 5, 7, 8
Littlehampton	Objection	1, 2, 4, 5, 7, 8
London Road Brighton	Objection	1, 4, 5, 7, 8
Meldreth	Objection	1, 4, 5, 7, 8
Moulsecoomb	Objection	1, 2, 4, 5, 7, 8
Newhaven Town	Objection	1, 4, 5, 7, 8
Pevensy & Westham	Objection	1, 4, 5, 7, 8
Plumpton	Objection	1, 4, 5, 7, 8
Polegate	Objection	1, 4, 5, 7, 8
Portslade	Objection	1, 4, 5, 7, 8
Preston Park	Objection	1, 4, 5, 7, 8
Pulborough	Objection	1, 4, 5, 7, 8
Reigate	Objection	1, 4, 5, 7, 8
Royston	Objection	1, 4, 5, 7, 8
Rye	Objection	1, 4, 5, 7, 8
Sandy	Objection	1, 4, 5, 7, 8
Seaford	Objection	1, 4, 5, 7, 8
Shoreham By Sea	Objection	1, 4, 5, 7, 8
Southbourne	Objection	1, 4, 5, 7, 8
Southwick	Objection	1, 4, 5, 7, 8
St Neots	Objection	1, 4, 5, 7, 8
Three Bridges	Objection	1, 4, 5, 7, 8
Uckfield	Objection	1, 4, 5, 7, 8
Warblington	Objection	1, 4, 5, 7, 8, 9
West Worthing	Objection	1, 4, 5, 7, 8
Wivelsfield	Objection	1, 4, 5, 7, 8
Worthing	Objection	1, 4, 5, 7, 8

**Transport Focus
31 October 3033**

Annex

1. Total objections received for Govia Thameslink Railway
2. Transport Focus's letter of 6 September
3. GTR response 28 September
4. Additional correspondence from GTR – 11 October
5. Additional correspondence from GTR – 19 October

Annex 1: Total objections received for Govia Thameslink Railway

Station specific objections:

Station	Objections received
Angmering	250
Arlesey	48
Arundel	67
Ashwell & Morden	28
Balcombe	50
Baldock	41
Barnham	172
Berwick Sussex	73
Bexhill	299
Biggleswade	114
Billingshurst	139
Bognor Regis	432
Bosham	12
Brighton	1049
Burgess Hill	196
Buxted	43
Chichester	405
Christs Hospital	15
Cooden Beach	53
Crawley	139
Crowborough	305
Dormans	7
Downham Market	257
Durrington On Sea	93
East Grinstead	205
Eastbourne	396
Edenbridge Town	32
Emsworth	117
Eridge	16
Falmer	12
Ford	19
Goring By Sea	78
Ham Street	35
Hampden Park Sussex	32
Hassocks	419
Haywards Heath	583
Hitchin	369
Horsham	412

Hove	166
Huntingdon	259
Hurst Green	97
Ifield	25
Kings Lynn	505
Lancing	210
Letchworth	281
Lewes	791
Lingfield	23
Littlehampton	143
London Road Brighton	41
Meldreth	42
Moulsecomb	19
Newhaven Town	65
Pevensy & Westham	21
Plumpton	19
Polegate	183
Portslade	90
Preston Park	171
Pulborough	210
Reigate	92
Royston	191
Rye	135
Sandy	72
Seaford	173
Shoreham By Sea	385
Southbourne	32
Southwick	46
St Neots	150
Three Bridges	153
Uckfield	125
Warblington	4
West Worthing	181
Wivelsfield	62
Worthing	319
Total	12,493

In addition to the 12,493 station specific objections listed above, Transport Focus also received 27,648 responses objecting to GTR's proposals in general.

Total Govia Thameslink Railway objections: 40,171

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 Govia Thameslink Railway's proposals:

Station petition	Petition signatures
Buxted	231
Crowborough	1765
East Grinstead	1055
Edenbridge Town	97
Haywards Heath	34
Horsham	152
Hurst Green	89
Lewes	783
Lingfield	453
Littlehampton	315
Preston Park	120
Rye	303
Uckfield	313

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.