By email

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Dear David

Ticket offices: emerging issues and clarification questions

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

This analysis continues but there are a number of issues that we wanted to flag up at this point, along with a series of questions seeking further clarification.
At the beginning of the consultation process we set out the criteria (https://www.transportfocus.org.uk/
publication/transport-focuss-role-in-assessing-major-changes-to-ticket-office-opening-hours/) we will use when assessing proposals. We have grouped these issues and questions under the main headings in our criteria.

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

* Adequacy of retail facilities
We do not know the existing TVM usage (both sales and Ticket on Departure collections) for each station. So, we are unable to determine whether there is sufficient capacity to absorb the number of transactions previously provided by the ticket office. For example, at both Letchworth and Royston, there are significant ticket sales in peak hours. There are other examples of high levels of ticket sales at peak times.

If TVMs cannot cope with the additional demand there is a risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket.

We are also mindful average processing time at a TVM can be misleading as demand

is not evenly spread throughout the day/hour - passengers tend to turn up in clusters, 10 minutes or so before their departure. At those stations where TVMs are located on platforms only, the impact of this is magnified when the peak flow of passengers is on one platform.

Questions:
* 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?
* Has any assessment of the TVM capacity at each station been carried out? This is both in terms of overall capacity and 'remaining' capacity – i.e. factoring in existing sales and Ticket on Departure collection per hour from the TVM?
* What reassurance/evidence can you give that there will be sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours?
* What assessment have you made of the impact of seasonal peaks, especially at tourist destinations?
* Has any assessment of the location of TVMs been carried out - are they in the right place to meet demand?
* What mitigations do you intend to put in place to help staff 'queue bust' at busy times?
* 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?
* What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?

* Usability, functionality and accessibility of Ticket Vending Machines (TVMs)
The Annex B spreadsheets provided by GTR suggest that the only tickets TVMs are not currently capable of selling are annual seasons, and excess/penalty fares, yet we know this not to be the case.

We would ask whether any of the following can be provided from GTR TVMs:

* Advance tickets and reservations
* Season tickets (longer than weekly)
* Railcard Sales (National and regional)
* Car park tickets
* Refunds
* National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)
* Boundary Zone add-ons
* Staff travel discount
* Buying tickets in advance rather than on the day of travel
* Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements)
* Seat reservations
* Changing a booking/tickets
* Use of rail vouchers
* Use of rail warrants
* Ranger and Rover tickets

* Plus Bus tickets
* Ferry connections
* Group Save
* Off-peak purchases before the off-peak begins (i.e. before 09.30)
* Cycle reservations
* Photocards for season tickets
* Scholar tickets
* Sleeper bookings
* CIV tickets for connections with Eurostar international services.

Removing the ability to buy these tickets at stations where they were previously sold by the Ticket Office would represent a significant drop in retail capability. Those passengers who do not have access to online options such as the app or website would face a significant reduction in what they can purchase and could end up paying more than they need to as a result.

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

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

Questions:
* How will disabled people who cannot use a TVM purchase a ticket? And how will this be made obvious to passengers?
* How will people summon a member of staff if they need help while using a TVM (i.e. the equivalent of the 'red light' at a supermarket self-checkout till)?
* Is it proposed to upgrade TVMs to offer remote access/video help facilities?
* Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability? This includes whether they are under cover, whether passengers queuing are protected from the weather and whether they can be read in direct sunlight.
* 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?

An increased reliance on TVMs makes it even more important that they are monitored and maintained. This applies to operational resilience and to customer

service quality. We are mindful that there are standards for queuing times at present (3 minutes in the off-peak and 5 minutes in the peak) but that these apply only to the ticket office and not TVMs. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queueing at a ticket office.

Questions:
* What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs?
* Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?
* Paying by cash
It isn't clear from the Annex B data what proportion of tickets are purchased at ticket offices and TVMs using cash.

We note that except for Brookmans Park and Essex Road (and Brent Cross West when it opens), there is at least one cash TVM at all GTR stations. Where there is no alternative cash retail option at the station, many of these passengers will have to purchase onboard the train or at their destination. This risks a worsening of the customer experience for these passengers, potentially lost industry revenue, and potentially worsening punctuality if the guard is required to sell tickets rather than standing by to open doors.

Questions:
* Have you made any specific assessment of the ability of TVMs to cope with the increase in cash, especially at stations where there is a higher-than-average use of cash to purchase tickets?
* If a person 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?
* How will passengers with cash be able to buy the products listed above in relation to TVMs (page 4)?

* Digital switch over
Annex B indicates that both on and off station alternatives to the ticket office will be available to passengers, but it's not clear what proportion of passengers are expected to switch to online options. While there is a clear trend in this direction a substantial number of people either cannot or have chosen not to move to digital.

We know from our research that resistance to booking online often comes from uncertainty and a lack of confidence, exacerbated by the complexity and variety of ticket options available. Without evidence to the contrary, we must assume that many of these people will continue to want advice and support at the station and not migrate to digital channels. If there are no plans to increase the number of ticket vending machines (TVMs) at some stations (coupled with the right support from staff) we have concerns over GTR's ability, at some stations, to sell the expected number of tickets displaced from the ticket office, especially at peak hours.

For example, on the Southern Network there are significant peaks in ticket sales at London Road Brighton, Moulescoomb and East Grinstead, each of which has only two TVMs. On Thameslink there are a number of stations with significant sales

during the peak such as Letchworth and Royston.

Questions:
* Do you have any evidence showing how many/what proportion of people will move to digital if ticket offices are closed?
* Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?
* Have you made any assessment of who will not/cannot move to digital and the effect on them of closing the ticket office?
* Do you have any forecast of the impact on revenue – i.e. on how many people will no longer travel as a result or will now travel without paying?
* Do you plan to issue station staff with handheld ticket machines so they can still offer direct face to face retailing to those that need this support to access the full range of tickets?

* 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?

* Availability of staff to provide help and advice:
The overarching intention of GTR's proposals appears to be to use staff from the current Ticket Office and Gateline teams at stations to resource the new role of Station Host, and then do away with those teams. From the proposals received it does not appear that other station roles are set to change. We can, for example, see no planned reduction in the number of Despatch staff at those stations that currently have them.

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

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

At many stations that currently have both teams (Gateline and Ticket Office) the number of staff is to be reduced. It is not clear from the proposals; what proportion of Station Hosts will retain the specialist retail knowledge of Ticket Office staff. If the level of knowledge/expertise is different amongst Station Hosts this could result in passengers receiving inconsistent, or worse, incorrect, advice.

For example: at Horsham station the number of staff across the two teams will be reduced by just over half. At Hassocks station the number of staff in the two teams will be reduced by just over a third.

Whilst we would not expect GTR to be able to tell us how many of the ticket office staff will be retained in future roles, it should be possible to set out what plans there are to ensure that all Station Hosts have the right level of retail training/knowledge. To enable them, to correctly answer the type of ticketing queries passengers would previously have raised at the ticket office.

It is not clear how the Hub station proposals such as at Kings Lynn and Huntingdon will operate or how many staff will be present at any given time.

Questions:
* 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?
* How comparable will this be with the training previously given to ticket office staff?
* How will the hub station proposals operate and what level of staffing will be in place at these stations?

At some stations the proposals would see a substantial reduction in the overall staffing hours at a station and/or the number of staff at the station. For some this might mean that there is no longer a staff presence for considerable parts of the day, or at weekends.

For example, according to the 'Annex B' spreadsheet:
* Billingshurst station currently has one member of ticket office staff available 06:00 – 19:25 Monday to Friday, 07:10 – 13:45 Saturdays and 08:10 – 16:45 on Sundays. If the proposal goes ahead as planned, there would no longer be a staff presence at the station on weekday afternoons after 13:30.
* Cooden Beach station currently has one member of staff available: 06:15 – 18:30 Monday to Friday, 06:15 – 18:30 Saturdays and 08:00 – 16:00 Sundays. If the proposal goes ahead as planned there will be no staff at the station after 13:30 Monday to Friday and reduced hours at the weekends.
* Emsworth station currently has a staff presence, provided by ticket office staff: Monday to Saturdays 06:40 – 13:15, and Sundays 08:10 – 15:45. If the proposals go ahead as planned the staffed hours would be reduced to 06:30 – 10:30 only; there would be no staff presence at weekends.

Although there are variations across the network, there are three other scenarios within the proposals:

1. The ticket office will close, but the existing opening hours are 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 all see the current ticket office opening hours retained, covered by Station Hosts. There are no other staff at some of these stations.

2. The ticket office will close, but the proposed hours exceed the current number of staffed hours currently provided by the ticket office staff.
For example: At Burgess Hill station passengers will 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 are provided at Haywards Heath and Hassocks.

3. The ticket office will 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.

For example: At Crawley station the staff presence is provided by both ticket office and gateline staff. The ticket office is currently staffed Monday to Friday 06:10 – 20:20 and Sundays 08:40 – 18:15. The gateline staff are there most of the day: Monday to Saturday 05:15 – 00:45, and Sundays 06:00 – 00:15. Under the proposals the new Station Hosts would work Monday to Saturday 06:00 – 22:30 and Sundays 08:00 – 20:00. Whilst this represents an increase in hours when compared to the ticket office opening times, it now means that the station won't be staffed from 22:30 Monday to Saturday and after 20:00 on Sundays, where it was before.

At Hove station the ticket office is open 05:50 – 21:00 Monday- Saturday, and 07:10 – 21:45 on Sundays. Under the proposals Station Hosts would be present 06:00-23:00 Monday – Saturday and 07:30 – 23:30 on Sundays. Whilst the new hours would be longer than those currently served by ticket office staff, they would fall short of the hours currently covered by gateline staff 04:55-01:50 Monday-Saturday and 0600-0030 Sundays
A number of practical questions have been raised about how the new arrangements would work in practice - for example, in how people will find a staff member if they need help and what queuing arrangements will apply when several people want help at the same time. This is relevant for all passengers, but especially disabled passengers/those requiring assistance. Annex B suggests that station hosts will be tasked to prioritise locations to provide customer service dependent on the time of day. It would be helpful to have more information on how this will work, particularly at those stations that will see a reduced number of staff, but with increased responsibilities.

For example, at Eastbourne the EIA identifies that the station would benefit from a dedicated accessibility team given the number of assists it currently deals with. And, that there is a significant risk that if staff are reduced there would likely be more assistance failures. Under the proposals the number of staff (Station Hosts) drops considerably, and the maximum number working at any one time is also reduced.

On the GTR websites, under FAQs on the ticketing consultation, passengers are advised that those tickets that cannot be purchased from ticket machines will be available at a selected number of stations such as Horsham, Chichester, Brighton, and London Blackfriars/Victoria. Presumably, these have been identified as 'hub' stations, where the ticket offices will retain ticket issuing equipment so that the Station Hosts can sell passengers the tickets that they need but are not available from the TVM. This is described as an interim arrangement on the GTR websites. Within the station proposals there is no explanation of what interim means for those passengers unable to purchase the ticket they want at their station of origin, either in respect of the individual journey experience, or as the relevant products start to become available online.

Questions:
* What rationale was used for determining which stations were to be included in this 'interim arrangement'?
* How do you intend to brand these stations so that passengers understand their role?
* 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?
* 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?

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

It is clear that GTR's proposals will result in some stations no longer having staff for significant periods of the day, during which there is currently ticket office or gateline staff present.

At stations where overall staffing hours will be reduced the ability of disabled passengers to seek 'turn up and go' assistance will be impacted, making the service less appealing. While in many cases staff on board the train may be able to assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform. While 'mobile' staff may be able to offer this service at some stations, even if this could be delivered robustly, it appears to inevitably mean passengers having to pre-book or wait for the staff to arrive when they didn't before.
We know through our research that passengers greatly value staff at stations. This is not just related to selling tickets but also in relation to safety and security, providing information and help and support.

Questions:
* When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?
  ? If this is reliant on onboard staff how will passengers be
     assisted to move around the station to the platform/to
     purchase the correct ticket/get advice/journey plan? How
     will passengers alert the guard if they haven't pre-booked
     assistance?
  ? 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?
  ? GTR has previously indicated that its existing Mobile
     Assistance Team (MAT) will not be expanded beyond the
     current stations served (59 in total). However, in several
     Equality Impact Assessments (EIA) for stations not served
     by the MAT (for example Ford, Wivelsfield, and Worthing)
     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?
  ? If the mitigation is to provide an accessible taxi what

processes will be put in place and what is your assessment
of the adequacy of this compared with travel by train? I.e.,
how easy is it to source accessible taxis and how reliable
are they.
? What monitoring regimes will be put in place to measure
time taken and reliability?
? How will people summon help if staff are not there?

? What assurance that rostered station hosts will always
include someone not medically restricted or locally agreed
to ensure accessibility support will be available?
? 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?
? For example: At Rye station, the proposals will see a
reduction of staffed hours (46 hours per week). This means
there will no longer be staff at the station Monday –
Saturday afternoons (after 13:00) or at all on Sundays.
There is no tactile paving at this station, and that it is a
popular destination for tourists during the summer
months, who are more likely to be unfamiliar with the
station.

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

Questions:
* Are staffing levels sufficient to ensure assistance can still be offered at
busier times alongside other duties? Do you have any evidence or analysis that
addresses this?
* What assurances can you provide that staff will not be pulled away to other
duties rather than providing assistance?
* How will staff at the station, and on the train know if passengers need help
to board?

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

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

provided and to investigate why it happened?

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

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

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

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

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

We are aware that the GTR Help Points have two buttons for passengers to push, one labelled emergency, the other information. Disabled passengers seeking assistance from the Assistance Team (located at Three Bridges ROC) are meant to push the emergency button. It isn't always sufficiently clear on the Help Points themselves that the emergency button can be used for this purpose. In addition, we are aware that the switching off of some mobile phone 3G networks and ISDN lines could impact the operation of the Help Points.

Questions:
* 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?
* 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 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?

* What are you existing processes and Service Level Agreements for monitoring that help points are working, and the response time to repair faults?
* 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?
* What are the service quality regime standards for answering help point information calls (i.e., Within how many seconds)?
* What are the arrangements for monitoring how quickly control respond to passengers using the emergency button to seek assistance?
* 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?

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

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

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

Questions:
* What changes to ticketless travel rules will be made/where will these be written down to give people who can't buy a ticket some assurances that they won't be penalised? What additional measures will be taken in respect of those journeys involving travel on DOO services/connections with operators?
* What processes will be in place so that passengers do not have to publicly declare/evidence their disability to buy on the train without penalty?
* How will you review signage to avoid sending inconsistent messages about revenue protection?

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

From the initial information provided in Annex B it appeared that access to vital station facilities such as lifts, waiting rooms and toilets could be reduced at many stations where staffing hours are to be reduced. We understand from the overarching EIA published on the GTR websites that the intention is to continue to make these facilities available to the same extent as they are under current staffing hours. It says that "we will identify an appropriate member of staff" who will be responsible. It remains unclear what arrangements will be put in place at those stations that will have no staff other than the Station Hosts.

Questions:

* What mitigations have been designed to keep facilities open, when there are no rostered staff at a station? How reliable/robust will they be?
* When will the proposed mitigations be implemented?
* If facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?
* We understand that alarms for '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?

Issues relating to whether passengers feel safe at the station.

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

At others it would mean a reduction of staffing hours at times when passengers might most value a visible staff presence for reassurance, e.g., for personal security

For example:
* Falmer station is located close to two halls of residence (University of Brighton) and the university campus itself, which has a student union/bar. Given Brighton's vibrant nighttime economy, the proposal to curtail staffing at 23:00 (Monday to Saturday) rather that the current 00:40, could raise passengers concerns over Anti-Social Behaviour, and personal security. Similar could be said of Shoreham By Sea, also close to Brighton, where Monday – Saturday staffing hours will be scaled back from 01:30-23:30.

* Reigate station –The EIA for Reigate highlights the fact that on weekday afternoons the station platforms fill up with school and college students, and anti-social behaviour has been recorded. The proposal will see the maximum number of staff at the station reduced. Without mitigations in place, passengers might question whether a reduction in staff, at the time the station is at its busiest, is appropriate.

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

* Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?
* Are all GTR Help Points connected to CCTV so that Control can see passengers calling for help?

Other issues

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

* Accessibility
We note that unlike other operators GTR has taken the decision not to publish Equality impact assessments for each of its stations, choosing instead to provide an overarching document at network level. We understand that the station level documents are live and will be update once GTR has received feedback on the proposals.
Questions:
* 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.

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

Questions:
* What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?
* Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?
* How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?
* How will compliance with any agreed new hours be monitored and reported?
* What arrangements have been made to provide staff cover for things like sickness and holiday?

* Timing of mitigations
There have been many comments about the sequencing of events and a call for fares and ticketing to be reformed and simplified before removing ticket offices. The same applies to the timing of potential mitigations designed to lessen the impact of closing ticket offices, such as upgrading TVMs.

Questions:
* What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?
* Is there any reason that Transport Focus should not object to the change until the mitigations have implemented and can be demonstrated to be adequate?
* Has any necessary funding/agreement been secured to implement any mitigations?

* Liaison with other operators
We are mindful that some stations also serve trains run by other train companies or involve Network Rail managed stations.

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

We would welcome further clarification on these points. We recognise that there are a lot of questions and the issues raised are complicated, so we would be happy to meet to discuss these in more detail. However, if we are to reflect any comments in our final submission, we will ultimately require a formal written response on these points. We will need this by 27 September 2023.

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

Yours sincerely

Linda McCord
Senior Stakeholder Manager

Coped to:
Myriam Walburger
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