

## **Greater Anglia's proposed changes to ticket offices: 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 Greater Anglia's proposal to change ticket office opening hours at regulated stations. It outlines responses received during the public consultation which began on 5 July 2023 and then sets out Transport Focus's conclusions.

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

We acknowledge that the proposal was designed to respond to this shift in 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**

Greater Anglia published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 39,518 representations objecting to Greater Anglia's proposal and 35 representations supporting Greater Anglia's proposal.

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

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

Transport Focus acknowledges that Greater Anglia has made significant improvements to its original proposal, especially in reinstating staffing hours at stations. However, having analysed these revised proposals we still have concerns with aspects of the proposal. Some of these are specific to Greater Anglia stations but the majority are generic issues at an industry-wide level that are relevant to all operators. These are set out in detail below. We are willing to continue engaging on these, but they have not yet been resolved. As a result we must object to proposals at **all** Greater Anglia 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 Greater Anglia proposed that Welcome Points will be developed at stations 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 taken.

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 are not satisfied that:

- The remaining retail capacity at Kelvedon, Lowestoft, Ingatestone, Frinton and Rochford would meet demand at peak periods.
- The resource levels proposed for retail staff (customer hosts) at Audley End and Billericay is sufficient to fulfil all functions.

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

### **3. The process**

The procedure for making a major change to ticket office opening hours is set out in clause 6-18 of the [Ticketing and Settlement Agreement](#) (TSA). This requires a train company to post details of the change at affected stations and to invite people to send any representations to Transport Focus (or to London TravelWatch if the station is based in their operating area). Transport Focus can then analyse the responses and use them to help inform its decision on whether to object to the proposals for stations in their 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 existing process in the TSA a nil response on our part is deemed to be acceptance of the proposals. Therefore we continued with our role in the process as written.

Transport Focus was originally due to respond on 30 August but, when the consultation period was extended, this moved to 6 October. Due to the

unprecedented volume of responses to the consultation this date was subsequently extended again, until 31 October, to allow enough time to process and analyse responses.

#### **4. Responses to the consultation**

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

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

We received 39,518 objections to Greater Anglia’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 93,185 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 35 representations supporting Greater Anglia’s proposal to close ticket offices out of a total of 721 nationally.

It is important to note that this records the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, consulting on each individual station rather than a single operator-wide or national consultation. Hence it was acceptable for someone to send a

separate objection for individual stations or a separate objection for each individual train company.

## 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 SofS 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. the proposed change fails to meet the criteria, or meets the criteria. Alternatively, the procedure permits an arbitrator to be appointed to determine if the criteria are met.”

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

- *Passengers can easily buy the right ticket for the journey they want to make.*  
This included the product range available at the station, what support is available to advise/help with a purchase and access for people who need to use cash or do not have a smartphone.
- *Passengers requiring assistance to travel receive that assistance in a timely and reliable manner.*  
This included arrangements for providing booked assistance (using the Passenger Assist process), assistance provided on a ‘turn-up-and-go’ basis, the support available when buying a ticket and the ease of requesting assistance.
- *Passengers can get the information they require to plan and make a journey, including during periods of disruption.*  
This included the information channels available at the station and the support available to help passengers who need assistance.

- *Passengers feel safe at a station.*  
This included perceptions of personal security and how train companies will provide reassurance for passengers wanting to travel.
- *Passengers are not penalised if they cannot buy the ticket they require from the station.*  
This included arrangements for issuing Penalty Fares or prosecutions for fare evasion.
- *Passengers can continue to use facilities at a station.*  
This included access to facilities such as waiting rooms, toilets, lifts and car parking.

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

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

## **6. Our assessment**

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

Greater Anglia's original proposal was to:

- Close most ticket offices and move staff to other station areas, where they would be better placed to help customers buy tickets and provide travel advice and information.
- At Chelmsford, Colchester, Ipswich, Norwich and Cambridge, Customer Information Centres (CIC) would sell a full range of products, as well as providing help with more complex transactions. These CICs would replace the ticket office but they would still be regulated under the terms of the TSA – meaning the existing regulations would move to the CIC.
- Across the remaining stations, there would be three variations in the ticket retailing and support options available:

- Stations where staff would be available on site throughout the day, as now.
- Stations where staff would be available on site for part of the day, as now.
- Stations where staff would be available on site for fewer hours than now and focused on the busiest times.
- At these stations tickets could be purchased via Ticket Vending Machines, with staff helping use them if needed.
- Additional mobile teams would be created offering greater flexibility and support in providing assistance.

Chelmsford, Colchester, Ipswich, Norwich, and Cambridge stations were not submitted as ‘major changes’ under the TSA process and so were not part of the public consultation. However, we note that changes have been made to the ticket office opening times – for example, it is proposed that Chelmsford station would close at 19.10 (Monday-Friday) rather than 22.00 at present. These represent a change to the regulated hours and, as they have not been included under the current consultation, we presume they have been submitted to the Department for Transport (DfT) under the minor change arrangements set out in the TSA. Transport Focus is not consulted on minor changes; but we are conscious that [guidance](#) issued by the Secretary of State says that changes may be made under this procedure “if either the total time during which the ticket office is open each day is not materially reduced or the change does not have a material adverse effect on passengers or other operator’s sales through that office”. The latter is typically defined as being less than seven ticket issues per hour. We would question whether these constitute minor changes – if not then a separate public consultation would be required before the hours could be reduced.

We also note that Bury St Edmunds station was not part of the public consultation. This is a regulated station and is listed in [Schedule](#) 17 of the TSA. The existing opening hours (0545-1815 Mon-Fri; 0650-1730 Saturday; and 0815-1600 Sunday) should therefore continue to apply, as should the existing product range, until such time as a major change request is submitted and a public consultation conducted.

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

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

reviewed on a station by station basis with input from your Accessibility Panel). This proposal was also subject to business case approval.

- Proposals to install additional TVMs at some stations subject to business case approval.

We acknowledge that you have made significant changes to your original proposal in response to passenger feedback from the consultation, especially in reverting to current staffing hours in most cases. We know from our research that passengers value staff at stations highly for safety and security, information, and advice and help purchasing tickets.

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

*“We have children who use this station outside of what are proposed to be the new staffed hours and to think that people will not need on site assistance after 12.50 PM is not realistic. The international school here also has children travel from long distances to attend who will need assistance, particularly when things go wrong with the service or an on-site ticket machine.”*

*“Under the proposals, the station will only be staffed Monday to Friday 7am-2pm, which is a big reduction in the staffing at the moment. Weekends and the evening time at march are busy times. Who will be there to help and advise customers? The answer is no one.”*

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

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

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

### *Complexity of fares and ticketing*

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

Some, such as those who are unbanked and/or have no access to digital channels, have little choice but to buy from the station. Others are reluctant to move online – our research shows that this resistance often comes from uncertainty and a lack of



confidence, exacerbated by the complexity and variety of ticket options available. This is not only a matter of personal preference, it is often for hard, practical reasons about routing or time restrictions and concern about the consequences of buying the wrong ticket, including potentially paying more than they needed to. Staff support often offers confidence that the most appropriate ticket for the journey has been purchased.

Comments received during the consultation illustrate this point:

*“There have been multiple occasions where there have been delays, disruptions, or cancellations, and I would not have been able to get to my destination without the help of the ticket office staff. They make it so much easier to use the trains and provide support that is invaluable...”*

*“The ticket office provides clear advice in navigating the complexity of ticketing choices, especially when changes or disruption are expected.”*

*“The ticketing system is very complicated and the machines are not easy to identify what ticket you need to buy. The offices are critical when you do not know the area and are able to provide advice and information, including refunds and payment by credit notes.”*

#### *Useability of Ticket Vending Machines*

Greater Anglia’s original proposals placed a much greater reliance on sales from Ticket Vending Machines (TVMs) than at present.

TVMs clearly have an important role to play in retailing tickets, and we know from our research that regular users find them quick and easy to use once you know how. However, it is equally clear from our research and the comments received that some passengers still have concerns about using them. TVMs are not physically accessible to all passengers and some people with cognitive disabilities can have difficulties in using them. Others do not find them particularly 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:

*“Ticket machines are inaccessible for elderly, visually impaired, disabled or dyslexic and removing the ticket offices reduces people's capacity to be independent.”*

*“As someone who experiences anxiety using ticket machines especially when there is a queue I would much prefer to have a face-to-face interaction with someone selling me a ticket and to who I could ask for advice.”*

### *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.

*“The ticket machines on the platform are slow to use and people trying to use them often take ages because they're not particularly user friendly – particularly if you need to purchase tickets for further afield stations. The queues will mean possibly missing trains.”*

*“It would become impossible for many people to travel by train. At peak periods, both the singular ticket machine and the two ticket desk windows being open still cause large amounts of queueing.”*

### *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.

*“Cannot obtain ticket purchase online as no credit/debit cards, have seen machines often out of order so ticket office only way to buy and offering personal help and advice and take cash!”*

*“I am writing to you on behalf of my 82-year-old neighbour, he doesn't have internet, he doesn't have a smart phone, he doesn't have a credit card preferring to use cash saying you know where you are when you pay for things as you go along.”*

#### *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, Greater Anglia's TVMs do not sell products such as Railcards, Ranger and Rovers, Advance Purchase fares, and national concessions for disabled people (for wheelchair and visually impaired passengers plus a companion). Nor do they provide seat reservations, allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

*“I am also entitled to a discount, which I am unable to apply via website, app or ticket machine.”*

*“I will no longer be able to use the railway as all the products I use are only available from Clacton-on-Sea's ticket office.”*

Your proposals (as revised) stated:

- You have improved staffing hours and staff will be available to assist customers with ticket purchasing for the same hours as today.
- All multi-skilled station hosts will be provided with the same level of training in relation to ticketing and the product range that colleagues in the ticket office receive today.
- There is a cash payment facility at each station.
- Some products (for example, Rovers/Rangers, national concessions for disabled people, rail warrants, and rail vouchers) could also be purchased/used on the train from the conductor on some routes.
- TVMs:
  - o Your ticket machines have Virtual Ticket Assistance (ViTA) – which is a ‘help’ (ticket assistance) button connecting customers to a 24/7 Customer Contact Centre in Norwich. They can provide advice on the best ticket option for a customer, and take over the ticket purchase and issue them for the customer.
  - o You have analysed projected increases in ticket sales and are proposing to add additional TVMs at some stations (subject to business case approval).

- You are trialling a ‘plain paper print roll’ ticketing solution on 38 ticket machines, between November 2023 and January 2024, which will see barcode tickets being issued from ticket machines for the majority of tickets resulting in quicker ticket printing time. GA plans to roll out this technology to all of the 188 compatible ticket machines at staffed stations between April and July 2024 (subject to funding approval).
- You are planning improvements to TVM functionality (covering Advance Purchase fares, seat reservations, and Rover/Ranger fares) – but this is not planned to be completed until mid-late 2024 and is dependent on funding.
- Your Accessible Travel Policy commits to a customer being able to board a train without a ticket if the ticket machine is inaccessible to them. Customers can then buy a ticket onboard (if available via a conductor or revenue protection officer) or at their destination station without a penalty.
- There are also industry-wide proposals to:
  - Remove the requirement for a Photocard when purchasing a Season Ticket. Operators will accept any reasonable alternative form of ID, such as a driving licence, passport, Railcard, student ID, alternative entitlement card (senior citizens pass) or national ID card. For customers who do not have access to a suitable alternative form of ID, a Photocard will still be available from remaining Ticket Offices and via post from a contact centre or third party retailer.
  - Offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead.
  - Allow changes to booking or tickets purchased via ticket machines.

On 19 October you proposed an additional mitigation. You stated:

“Our proposal still remains that our multi-skilled host would continue to assist customers at the TVM or provide assistance to customers with the digital purchase of tickets/products in the first instance. However, we recognise that for a small number of customers this approach may not work. These scenarios would include:

- If a customer isn’t digitally enabled and the product is not available on the TVM or from an on-board conductor.
- If a customer can only pay with cash and the product cannot be bought on the TVM or from an on-board conductor.

Therefore, our further temporary mitigation proposes that the multi-skilled host at the station, in the scenarios highlighted above, would have the ability to sell those tickets to a customer via all payment methods, including cash. These arrangements would apply until suitable alternative mitigations are in place.”

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this will ensure that there is a member of retail staff present at the same times as now at most stations. We also acknowledge that they will be trained to the same level as now and will be able to help passengers buy tickets from TVMs, and that further assistance is available via virtual ticket assistance link on TVMs. In addition, we acknowledge that retaining the existing ticket office sales capability will ensure that products not available online or via 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 still have concerns with the following:

*i) Product range*

We note your reference to the retention of existing sales 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.

We would also ask how Greater Anglia will make passengers aware that the existing sales equipment is being retained and can be used. If this is to be an 'on request' option, then passengers will need to know that this exists and that they can request certain products and services. We believe this requires further clarification and discussion – we do not object subject to this being suitably clarified.

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

## **Conclusion**

**Recommendation 1:** Greater Anglia 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.

**Recommendation 2:** 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.

*ii) Retail capacity at the station*

We remain concerned about the ability of some stations to cope with sales demand at high-peak periods. Removing ticket windows reduces the number of 'points of sale' resulting in a much higher demand on the remaining TVMs. We note your statement of 19 October about retaining the existing retail capability for staff, but there is no mention of whether this will be used to tackle queues at TVMs or just to retail certain products on request. 'queue-busting' is something we have raised as part of the consultation.

We also note your assurance that additional TVMs will be provided at some stations in order to cope with the projected increase in demand arising from closing ticket windows. Your assurance is predicated on a throughput of 60 tickets per hour – one per minute. It can be easy to use TVMs for a simple purchase but not for a more complicated journey, especially where there are restrictions on which operator or route you can take. We believe that those transactions could easily take much longer, especially given the people 'displaced' from ticket windows will also potentially be those less familiar with TVMs and how to use them. If looked at from a more realistic 40-45 tickets per hour then the assessment shows a capacity problem at Kelvedon, Lowestoft, Ingatestone, Frinton and Rochford in particular. It also raises questions over Billericay, Great Yarmouth, Hockley, Newport, and Witham.

We also remain concerned at the lack of a queuing time metric at TVMs. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queueing at a ticket office.

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for TVMs. This could be based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken. There is also a strong argument for putting these results into the public domain, for example, in Customer Reports.

There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with

enforcement) will help provide reassurance and safeguards should industry expectations not be correct.

A commitment to such a queuing time metric would also give assurance at those stations above where there are larger volumes of sales to absorb onto TVMs. It would ensure there is a *formal* mechanism to review sales volumes and, if projections were wrong, to increase retail capacity.

### **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 specific concerns over the retail capacity at the following stations: Kelvedon, Lowestoft, Ingatestone, Frinton and Rochford.

#### *iii) Retail staffing hours*

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

We recognise that you have made significant amendments to the hours during which stations will have a permanent retail staff presence. However, we note that retail staff numbers could be reduced at some stations. From information you provided on a confidential basis we have concerns whether there would be enough specialist retail resource to cope with passenger volumes and demand at Audley End and Billericay.

### **Conclusion**

**Objection 3:** Additional specialist retail resource should be provided at Audley End and Billericay.

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

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

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in providing assistance and support. In the original proposal many stations would have seen a significant reduction in staff presence. This would have had an impact on disabled passengers' ability to 'turn up and go'. While in many cases staff on the train would be 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.

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

Comments received during the consultation included:

*“My brother used a wheelchair and without station staff he would not have been able to access the train.”*

*“As wheelchair users, and with failing sight, we need to know that help can be summoned immediately when in difficulty.”*

*“I buy my Travelcard or single zone return at the ticket office because I have some visual impairment and cannot see the ticket machine screen clearly to select the relevant option especially on sunny days when the screen is almost invisible to me.”*

*“Having no sight means that I cannot recognise station staff so a ticket office is a helpful and useful reference point for asking for help.”*

Your proposals (as revised) stated:

- You have improved staffing hours and staff will be available to assist customers with ticket purchasing for the same hours as today.
- Your proposed multi-skilled hosts will be positioned at designated Welcome Points (subject to business case approval) in which the default position will be as close as possible to the ticket machines (this will be reviewed on a station-by-station basis with input from your Accessibility Panel). A Welcome Point “would be an initial focal point on entering a station that provides any customer who needs support and/or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support.”
- The provision of assistance will be a priority for your multi-skilled hosts.



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

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

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

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

- A mechanism for alerting staff that you are at the Welcome Point and need assistance, at each station. It should be clear that this is for all passengers and not just those with a disability.
- A mechanism of informing people that the Welcome Point has shut ( 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 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. Therefore, we believe they must be piloted/trialled to establish what works best at different types of stations and how passengers react to them. Proposals on ticket offices would need to await the outcome of these pilots.

## **Conclusion**

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

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

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

It is clear from the public consultation that passengers value 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.

*“There will be nobody to help when both the ticket machine break or there is disruption and trains are not running to the displayed times.”*

*“Staff with a handheld ticketing machine cannot tell you of all the relevant connections available compared to those using the computers in the office, particularly when there are delays. These changes would put me of travelling on the train.”*

Your proposals (as revised) stated:

- You have improved staffing hours and staff will be available to assist customers with ticket purchasing for the same hours as today.
- Multi-skilled hosts will be provided with tablets and mobile phones (subject to business case approval). If a customer requires a printed travel itinerary, this will still be able to be provided.

We acknowledge the commitment to maintain the original retail staffing times. We believe that this should ensure the same level of access to staff for journey planning and disruption information as now. However, we would reiterate concerns about staffing at Audley End and Billericay and whether there is sufficient ‘customer host’ resource to ensure passengers can easily access this information.

## Conclusion

**Objection 3 applies again:** Additional specialist retail resource should be provided at Audley End and Billericay.

### 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:

*“What about women and vulnerable people who are on the station on their own with no staff? Who are they going to go to for support if things go wrong?”*

*“Consider the impact on women/vulnerable users later in the evening - when there are fewer people around and those that are, are less savoury - not knowing where to find a flesh-and-blood human to help them would make them considerably more anxious – if they brave the train at all.”*

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

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

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

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

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

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

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

Your proposals (as revised) stated:

- You have improved staffing hours and staff will be available to assist customers with ticket purchasing for the same hours as today.
- The Department for Transport and British Transport Police have agreed that you should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.

We acknowledge the commitment to maintain the original staffing times. We believe that this should ensure the same level of reassurance to passengers as now. Indeed, in some instances, having more a more visible staff presence (for example, staff out from ticket windows) could improve perceptions of safety. However, it will be important that the risk assessment mentioned above are completed and acted upon before any changes are made.

### **Conclusion**

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

**Recommendation 3:** 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.

*"I will not personally be impacted but many friends will be. For example, RNIB data shows that a significant proportion of blind and partially sighted people are not easily able to use self-service ticket machines. Vulnerable people will inevitably end up on trains without a correct a ticket and be penalised as a result."*

Your proposals (as revised) stated:

- You have improved staffing hours and staff will be available to assist customers with ticket purchasing for the same hours as today.
- National Rail Conditions of Travel already provide the conditions under which a passenger may travel without a ticket without incurring a penalty fare.

- Your Conductors and Revenue Inspectors currently operate in an environment where many stations are unstaffed or have ticket offices open only in the morning. You state that “Procedures are already in place to provide information to on-train staff about short term ticket office closures through sickness etc and any ticket machines that are out of order. They are therefore experienced in ensuring that customers who genuinely have been unable to purchase a ticket before travel are not penalised. In that environment it is not considered that any change to ticketless travel rules are required.”
- You state that “All current Revenue Protection signage is compliant with the Penalty Fare Scheme rules and considered appropriate in not sending an inconsistent message. There is no evidence of customer confusion around the Penalty Fares Scheme.”

We again acknowledge that reverting to original staffing hours will address many of our concerns as there will still be someone available to provide advice and to sell tickets at the same times as before.

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

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

However, the National Rail Conditions of Travel make no mention of allowing you to board in situations where you cannot get the ticket you want. And yet some of the mitigations presented are to buy some tickets onboard the train if they cannot be purchased from the station.

We note your statement that signage is compliant with the Penalty Fare Scheme rules and considered appropriate. We think that if ‘pay on board’ is to become standard for some products then there will need to be explicit permission that people can do this without penalty. This will require very clear signage and notification at the station – both in terms of when you can board without a valid ticket and when you can’t; and what products/services you can access on board and what you will need to purchase at the station. This will be particularly necessary at stations served by multiple operators. For example, at Ely would Greater Anglia’s ‘buy on board’ permission also apply if a passenger boarded a Great Northern train?

## **Conclusion**

**Objection 6:** We are not yet satisfied that adequate safeguards exist to prevent passengers being penalised if they cannot buy the ticket they require from the station.

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

In our letter of 6 September we raised concerns 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 result in a 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.

*“The waiting room and toilets are usually locked in the evenings. Will this now mean that they will be locked in the afternoons when no staff are present?”*

*“When stations are left unmanned then toilets are usually locked – I am an older person and find it difficult to be without a public convenience for too long. Toilets cannot always be relied upon when on board a train and I’ve sometimes travelled on trains that are so crowded that it is impossible to reach the toilets in any case.”*

Your proposals (as revised) stated:

- You have improved staffing hours and staff will be available to assist customers with ticket purchasing for the same hours as today. This 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.

We acknowledge the commitment to maintaining access to facilities for at least the same period as before.

## **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.**

## **6g) Other issues**

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

### *i) Future regulation*

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

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

*“And of course, there is the expectation that this is the thin end of the wedge. Over time, staff will be reduced down to almost zero and then the experience of travelling by train will become sterile as well as anxious for some”.*

*“I fear that... the closure ticket offices in general and the Great Yarmouth office in particular is just one step in removing staff from the station entirely.”*

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

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

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

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

## Conclusion

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

### ii) *Timing of mitigations*

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

Your letter of 26 September referred to two stages of mitigation. You stated that: “The ‘day one’ mitigations (in place for the day a ticket office closes) may be an interim measure to manage the transition until a longer-term solution can be implemented. These longer-term solutions will have already been planned and approved/contracted, and we will just be waiting for delivery of equipment or completion of an upgrade. The intention is for the ‘day one’ mitigations to act as a full mitigation to any specific issue, and therefore it is not seen as necessary to wait until a longer-term solution is in place before the ticket office closes. This approach would also allow for wider station changes and arrangements to be implemented, as soon as is practical, that will assist with modernisation and efficiencies to provide a better service for customers and better value for taxpayers.”

The main mitigation in your proposal is the decision to retain the existing station retail equipment in order to provide access to products/services currently available. 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 3.

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



## **Conclusion**

**Recommendation 1 applies again:** Greater Anglia 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.

### *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 needs to be a robust review mechanism based on research with passengers and a common and publicly available set of specific core 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.

## 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 specific concerns over the retail capacity at the following stations: Kelvedon, Lowestoft, Ingatestone, Frinton and Rochford.

**Objection 3:** Additional specialist retail resource should be provided at Audley End and Billericay.

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

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

**Objection 6:** We are not yet satisfied that adequate safeguards exist to prevent passengers being penalised if they cannot buy the ticket they require from the station.

**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.

<b>Station</b>	<b>Decision</b>	<b>Grounds for Objection</b>
Audley End	Objection	1, 3, 4, 5, 6, 7, 8
Billericay	Objection	1, 3, 4, 5, 6, 7, 8
Braintree	Objection	1, 4, 5, 6, 7, 8
Burnham on Crouch	Objection	1, 4, 5, 6, 7, 8
Clacton	Objection	1, 4, 5, 6, 7, 8
Colchester Town	Objection	1, 4, 5, 6, 7, 8
Diss	Objection	1, 4, 5, 6, 7, 8
Elsenham	Objection	1, 4, 5, 6, 7, 8
Ely	Objection	1, 4, 5, 6, 7, 8
Frinton	Objection	1, 2, 4, 5, 6, 7, 8
Great Yarmouth	Objection	1, 4, 5, 6, 7, 8
Hatfield Peverel	Objection	1, 4, 5, 6, 7, 8
Hockley	Objection	1, 4, 5, 6, 7, 8
Ingatestone	Objection	1, 2, 4, 5, 6, 7, 8

Kelvedon	Objection	1, 2, 4, 5, 6, 7, 8
Lowestoft	Objection	1, 2, 4, 5, 6, 7, 8
Manningtree	Objection	1, 4, 5, 6, 7, 8
March	Objection	1, 4, 5, 6, 7, 8
Marks Tey	Objection	1, 4, 5, 6, 7, 8
Newport (Essex)	Objection	1, 4, 5, 6, 7, 8
Prittlewell	Objection	1, 4, 5, 6, 7, 8
Rayleigh	Objection	1, 4, 5, 6, 7, 8
Rochford	Objection	1, 2, 4, 5, 6, 7, 8
Shelford	Objection	1, 4, 5, 6, 7, 8
South Woodham Ferrers	Objection	1, 4, 5, 6, 7, 8
Southend Victoria	Objection	1, 4, 5, 6, 7, 8
Stansted Mountfitchet	Objection	1, 4, 5, 6, 7, 8
Stowmarket	Objection	1, 4, 5, 6, 7, 8
Thetford	Objection	1, 4, 5, 6, 7, 8
Whittlesford Parkway	Objection	1, 4, 5, 6, 7, 8
Wickford	Objection	1, 4, 5, 6, 7, 8
Witham	Objection	1, 4, 5, 6, 7, 8
Wivenhoe	Objection	1, 4, 5, 6, 7, 8.

**Transport Focus  
31 October 2023**

**Annex**

1. Total objections received for Greater Anglia
2. Transport Focus's letter of 6 September
3. Greater Anglia's response to that letter.

## Annex 1: Total objections received for Greater Anglia

Station specific objections:

Alresford (Essex)	9
Audley End	284
Billericay	246
Braintree	134
Burnham On Crouch	23
Clacton	216
Colchester Town	116
Diss	139
Elsenham	59
Ely	611
Frinton	157
Great Yarmouth	88
Hatfield Peverel	35
Hockley	637
Ingatestone	413
Kelvedon	172
Lowestoft	208
Manningtree	190
March	173
Marks Tey	117
Newport	32
Prittlewell	20
Rayleigh	194
Rochford	188
Shelford	99
South Woodham Ferrers	25
Southend Victoria	124
Stansted Mountfitchet	134
Stowmarket	135
Thetford	58
Whittlesford	44
Wickford	167
Witham	507
Wivenhoe	278.

**Total 6032**

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

Bury St Edmunds	67
Cambridge	997
Chelmsford	435
Colchester	342
Ipswich	767
Norwich	652.

In addition to the 9,292 station specific objections listed above Transport Focus also received 30,226 responses objecting to Greater Anglia's proposals in general.

Total Greater Anglia objections: 39,518

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 Greater Anglia's proposals:

Lowestoft	471
Prittlewell	107
Stowmarket	74

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.