

## By email

Richard Rowland  
Great Western Railway  
Milford House  
Swindon  
Wiltshire  
SN1 5HL

Transport Focus  
Albany House  
86 Petty France  
London  
SW1H 9EA



[www.transportfocus.org.uk](http://www.transportfocus.org.uk)

6 September 2023

Dear Richard

## **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**

Many proposals appear reliant on passengers switching to purchasing tickets online rather than at the station. 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.

### **Questions:**

- What assumptions have you made about 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 an assessment of who will not/cannot move to digital and the effect on them of closing the ticket office?
- How accessible is your app and your website, especially for those with a disability?
- Do you have any forecast of the impact on revenue – i.e. in how many people will no longer travel as a result or will now travel without paying?

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. However, at some stations the number of TVMs does not appear to be sufficient to sell the expected number of tickets if the ticket office closes, especially at peak hours. For example, Barnstable, Bath Spa, Bristol Parkway, Bristol Temple Meads, Chippenham, Dawlish, Didcot Parkway, Exeter St Davids, Maidenhead, Newton Abbot, Paignton, Penzance, Plymouth, Reading, St Austell, Swindon Taunton, Teignmouth, Truro and Tywford. There are many other examples.

Yeovil Pen Mill would be left with no at station retail provision as it does not have a TVM.

Without additional capacity (via TVMs or handheld ticketing machines) there is the risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket. In saying this we note that ticket offices account for, on average, 15 per cent of GWR's sales, but that at some stations the figure is considerably higher. For example, at Barnstaple it is 45.5 per cent, at Cookham 30.9 per cent, at Dawlish 34.4 per cent, at Paignton 41.3 per cent and at Maidenhead it is 25.8 per cent. Many of these stations are in areas with high levels of leisure travel where the types of transactions are potentially more complex and passengers less well versed with the ticketing system. We are also mindful that the 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.

We also note that lost time, some of which is significant, may suppress the ticket office sales data for some stations. For example, Bradford on Avon, Bramley, Mortimer, Trowbridge, Westbury, Yatton and Yeovil Pen Mill.

## Questions:

- What reassurance/evidence can you provide that retail arrangements at each station will have sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours and at those stations with a higher than average proportion of sales from the ticket office?
- Has any assessment of the TVM capacity at each station has 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 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?
- What mitigations do you intend to put in place to help staff 'queue bust' at busy times – for example, will staff have access to handheld devices to sell tickets directly?
- How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?
- 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)

TVMs are not capable of offering the same range of products and services as ticket offices. It appears that the following products/services will no longer be available from the majority of stations:

- Advance tickets and reservations
- Season tickets (longer than weekly)
- Railcard Sales (National and regional)
- Refunds.

We would also ask whether any of the following can be provided from a TVM:

- 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
- Car parking
- 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.

If many of these products are no longer readily available this would represent a significant reduction in retail capability at stations. Those passengers who do not have access to digital would face a significant reduction in what they can purchase and could end up paying more than they needed to as a result.

We are also aware that there is an issue with connectivity at some stations when trying to pay for car parking via the car park ticket machine or via mobile phones. This could also push more people towards using the TVM.

**Questions:**

- Are there any other tickets, not mentioned in the list above, that would not be sold by the TVM?
- 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 the original ticket office machine or have a 'staff mode' option on a TVM) or be issued with handheld machines 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.
- What plans do you have to improve payment for car parking at stations?

TVMs are not physically accessible to all passengers and some people with cognitive 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 someone who cannot use a TVM, for example a disabled person, purchase a ticket?
- 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 (i.e. are passengers protected from the weather when queuing, are they hard to see in sunlight)? Do you have any plans to relocate TVMs?
- We are aware that some groups of disabled passengers are more likely to use cash when purchasing tickets. Are 'cash TVMs' at accessible (step- free) locations in the station?

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? For example, in relation to replenishing consumables, i.e. ticket stock and ink, and repairs to faults
- Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?

- **Availability of staff to provide retail advice and help**

We note that at most stations the plans involve redeploying staff for the same hours/period as the ticket office. However, at some stations the hours have been reduced. For example, according to the public information template, Bristol Temple Meads ticket office is staffed M-F from 0615-2130 while the proposal only covers 0630-1930 (and for Saturday which will

move from 0615-2130 to 0700-2000). Likewise at Bristol Parkway where hours have reduced by 30 minutes in the morning and evening. It is not clear why hours are being reduced at some stations. Particularly when average sales appear to remain high in some instances.

At some stations the proposals would also mean a substantial reduction in the overall number of staff at the stations, both in general and in relation to those with specialist retail knowledge. For example: Bath Spa, Bristol Parkway, Oxford, Maidenhead, Reading and Swindon. These stations may also have multiple TVMs and entrances.

Staffing resilience is also a consideration – the information provided on lost hours shows that there has been a problem in ensuring some ticket offices open when they should at present. It will be important that any new staffing times can be met on a consistent and reliable basis.

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 numbers are substantially reduced, or where staff will now have multiple duties, it appears this will make it harder for passengers to receive specialist advice or support from staff to make a ticket purchase.

Even if staff will still be present at the station, it's not always clear if they will still 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. It will be important that all staff with a retail function receive comprehensive training rather than an 'overview'.



A number of practical questions have also 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. Particularly where stations have multiple entrances or TVMs on different platforms. This is relevant for all passengers, but especially disabled passengers/those requiring assistance.

We note that around 14 stations will retain some ticket office functionality until Sep-Dec 2024. We assume that these are designed to provide some form of 'hub' framework which offers a greater product range.

### **Questions:**

- Why are retail staffing hours being reduced at some stations?
- 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 to support this?
- What training will multi-functional staff have in ticketing/product range to ensure they can provide expert assistance necessary to navigate the complex fares system and ensure passengers get the right ticket? Will this replicate the training given to existing ticket office staff?
- 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?
- What was the rationale behind choosing those stations due to close in Sep-Dec 2024. Why apply for closure now rather than in 2024? How will you brand these stations so that passengers understand their continued role as ticket offices? Why have staffing hours been cut at some of these stations?

- What resilience/contingency have you built into staffing plans to ensure that stations will be staffed as advertised and that 'lost hours' are minimised in future?

- **Paying by cash**

A significant proportion of tickets sold at some ticket offices are still purchased with cash. For example: at Bridgewater it is 28.3 per cent, Cambourne 38.1 per cent, Dawlish 29.8 per cent, Exeter Central 26.6 per cent, Gloucester 29.5 per cent, Newton Abbot 28.7 per cent, Paignton 29.2 per cent, Redruth 28.3 per cent, Teignmouth 28.4 per cent and Weston super Mare 29.4 per cent.

If 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:**

- Do your TVMs accept cash? 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 cannot pay by cash what arrangements will exist to enable them to travel, particularly where there are Driver Only Operated services? 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)?

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

---

We note that GWR's proposal focuses on redeploying retail staff and that in most instances the hours of redeployment match the original ticket office hours. That said, there are around 14 stations where the hours have been reduced (see our earlier comments). We also note that at some stations there are other staff (gateline and dispatch) that also act as a source of assistance and can provide support for disabled people who want to turn-up-and-go.

However, a number of questions have been raised during the consultation about how this help will be provided. The Equality Impact Assessments received were too generic and high-level for us to be able to undertake a meaningful analysis of the impact from an equality perspective. The document may amount to over 1000 pages but most of the information contained within has been repetitively cut and paste. There has been no attempt to provide station specific impact assessments – particularly in terms of the physical/practical implications of the proposals and the safety and security elements.

We also note that, while staff presence is maintained in most instances, the number of staff available has been reduced at some stations. 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 due to understaffing?

- How will staff at the station know if passengers need help to board?
- 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?
  - If services are operated as Driver Only Operation then how will assistance be provided?
  - If the mitigation is a mobile team how long will people have to wait? If you currently use mobile teams to provide assistance do you have any evidence on their effectiveness (e.g. time taken to arrive, passenger satisfaction)
  - 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?
    - Which of your stations do not 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?

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, 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?

One issue emerging concerns the operation and reliability of 'help points' at stations. If staff are harder to find, passengers may 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 a number of 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.

### **Questions:**

- Are help points at every station and are they in an accessible location?
- Are there any plans to position help points in concourse areas near ticket offices to avoid people having to walk along platforms or over bridges to summon help?
- What are your existing processes and SLAs for monitoring that help points are working and the response time to faults? What future commitments can you give?
- What are the standards for answering help points – i.e. within how many seconds?
- What are the standards for monitoring how quickly you respond to passengers using the emergency button?
- How will you monitor/report time taken to answer help point calls/proportion not answered?
- Do you have enough resource in place to ensure that an increase in calls via help points can be answered promptly and in accordance with standards?
- Is it clear how a disabled passenger would use the help-point when seeking assistance to board - e.g. would they press the information button or are they, as with some train companies, expected to press the emergency button to receive more immediate assistance?

## **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 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 information provided it appears that access to vital station facilities including lifts, waiting rooms and toilets can be maintained when the ticket office is closed.

### **Questions:**

- Can you confirm that all station facilities that are currently provided during ticket office opening hours will remain open during those hours?
- We understand that alarms for 'disabled' toilets are often located in ticket offices. Is this the case and, if so, where will these be moved to?

## **Issues relating to whether passengers feel safe at the station.**

---

We note that GWR's proposal focuses on redeploying retail staff and that in most instances the hours of redeployment match the original ticket office hours. We also note that at some stations there are other staff (gateline and dispatch). This continued staff presence will help to ensure that passengers feel safe at the station.

### **Questions:**

- Have you liaised with the British Transport Police about the impact on staff and passenger security?
- Are any mitigations planned?
- Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?



## Other issues

---

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

- **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?

- **Data sufficiency**

Our ability to review the proposals depends on access to the right data in order to build an accurate and complete picture on which to base our judgement. Without sufficient data including sales and lost hours over at least 6 consecutive weeks since February 2022 this will probably result in an objection.

- **Stations where a handheld ticket machine is used by ticket office staff:**

We are aware that there are a number of ticket offices around the Bath and Bristol area where there is limited sales data available for us to review due to the nature of the software which centralises transaction data. These stations include: Filton Abby Wood, Keynsham, Nailsea and Backwell, Oldfield Park, Worle, Yate. It remains unclear to us whether there will be any change to ticket office arrangements at these stations.

**Questions:**

- Can GWR confirm whether retail staff will continue to serve passengers at these stations with handheld ticket machines at the same time as they currently do and if these stations remain part of the existing Schedule 17 regulation?

- **Stations where there have been ticket office closures due to vacancies or structural issues:**

We note that there are also a number of stations where closures have meant that sales data has not been available for the standard period of time chosen for review. These include: Charlbury, Kemble Henley and Stonehouse. We have recently been provided with data for different time periods which we are now reviewing. However, we are aware that sufficient data cannot be found for Kemble. Without this data it becomes hard to properly assess the proposal for Kemble and would probably result in an objection.

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.

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

Nina Howe  
Senior Stakeholder Manager

Copied to: Jane Jones