

London North Eastern Railway's proposed changes to ticket offices: Transport Focus response

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

1. Introduction

This is Transport Focus's formal response to London North Eastern Railway'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

London North Eastern Railway (LNER) published details of its original proposal on 5 July 2023. The public consultation on this ran until 1 September. Transport Focus received 35,729 representations objecting to LNER's proposal and 32 representations supporting LNER's proposal.

LNER proposals include ticket office closures at Berwick-upon-Tweed, Durham, Darlington, Wakefield Westgate, Retford, Newark Northgate and Grantham stations. These ticket offices are included in the consultation process.

Ticket Offices will remain open at Edinburgh Waverley, Newcastle, York, Doncaster, Peterborough, and London King's Cross stations, and will eventually become known as Customer Information Centres. These ticket offices are not part of the current consultation process.

Transport Focus used information provided by LNER 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. LNER's response provided additional clarification on your original proposal.

Transport Focus acknowledges that LNER has clarified proposals in the consultation process, by stating: "that at least one multi skilled member of staff shall be available using a handheld ticket machine (MTiS) for the current operating hours of the ticket offices affected by the proposals, for a three-month trial period."

However, having analysed this clarification we still have concerns. Some of these are specific to LNER and some are generic issues at an industry-wide level. However, as a result we must object to proposals at **all** stations. A full list of stations is provided at the end of this letter.

The main reasons for this are:

- **Welcome Points**
LNER propose to repurpose the ticket offices, allowing more space for a dedicated accessible waiting area and meeting point/customer information point as an initial focal point that provides any passenger 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. We note that you plan to have induction loops fitted "at customer information points or other suitable locations."

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/trialed to establish what works best at different types of stations and to gather passenger feedback.

- **Access to rail products**
We are not satisfied that passengers would continue to enjoy widespread and easy access to the purchase of rail products at some stations. This includes:

- The range of tickets and services offered, including for those reliant on cash.
 - Where a passenger presenting at a station is unable to purchase their ticket via a TVM due to restrictions on TVM capability.
- **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 (TVM). 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 (such as issuing staff with hand-held ticket devices so that they can ‘queue-bust’ and/or installing extra TVMs).

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 forecasts not be correct.

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 representations to Transport Focus (or to London TravelWatch if the station is based in its operating area). Transport Focus analyses these responses and uses them to help inform its decision on whether to object to the proposals for stations in its operating area.

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the TSA. 13 train companies announced their plans simultaneously, of which 12 had stations in Transport Focus’s operating area, the exception being Southeastern.

The consultation process was challenged, especially over whether people (and especially disabled people) had adequate information on which to comment. We

note that train companies subsequently made proposals available in alternative formats and published Equality Impact Assessments. We had written to each train company requesting they make this information available. The consultation period was also extended by the train companies to 1 September, giving people longer to respond. Under the terms of the process set out in the TSA a nil response on the part of Transport Focus is deemed to be acceptance of the proposals. Therefore, we continued with our role in the process as written.

Transport Focus was originally due to respond on 30 August but, when the consultation period was extended, this moved to 6 October. Due to the unprecedented volume of responses to the consultation this date was subsequently extended again, until 31 October, to allow enough time to process and analyse responses.

4. Responses to the consultation

During the consultation period we received a total of 585,178 responses by email, webform, freepost and phone. Some were specific to individual stations, some were specific to train companies as a whole and some were at a national 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 35,729 objections to LNER'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 national 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 32 representations supporting LNER's proposal to close ticket offices out of a total of 721 nationally.

It is important to note that these are the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area – it was not a national consultation. Some people sent objections for individual stations, others sent a reply to each train company objecting to all stations in their area.

5. Criteria for assessment

Under clause 6-18 (1) of the TSA changes to opening hours may be made under the Major Change procedure if:

(a) the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness, and

(b) members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

Transport Focus may object to a proposal on the grounds that the change does not meet one or both of the criteria above. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State for a decision. The Department for Transport has previously published [guidance](#) setting out the approach the Secretary of State (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. LNER replied on 27 September. These letters are attached as Annex 2 and 3.

LNER's original proposal was to:

- Close all ticket offices at stations affected by the consultation 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 six major stations – Edinburgh Waverley, Newcastle, York, Doncaster, Peterborough and London King’s Cross – 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. However, they do not form part of the consultation process. We understand that staffing levels and hours shall remain unchanged.
- Across the remaining stations, the ticket offices would close with ticket retailing and support options provided by multi skilled staff. LNER propose to “encourage/educate customers to use self-serve options as a first resort. If they are at the station this will involve the use of TVMs where our staff will be on hand to assist. Additionally we will seek to increase awareness of web based options to offer more convenient alternatives in the future. If customers prefer or require tickets to be issued by one of handheld devices then we will do so but we will still promote the alternatives for future consideration.”

Following further discussions with Transport Focus your letter of 27 September provided additional clarification to your proposals:

- Multiskilled station staff will have access to an MTiS device (a form of mobile ticketing equipment) to assist customers with purchases not available from TVMs. The number of handheld devices available will be matched to meet anticipated demand at each station. LNER see these as supporting other ticketing channels throughout core hours.

We requested further clarification on the above as we were unsure as to the precise nature of ‘core hours’. We believed it reasonable to clarify what hours at stations, passengers could expect to purchase a ticket if required via a handheld device and how many multi-skilled staff would be available to fulfil that transaction.

We received further clarification on 10 October:

- LNER propose to always have a minimum of one staff member available using MTiS for the current opening hours of the relevant ticket offices. LNER will undertake a three-month trial using these hours to assess the volumes and customer feedback.

We acknowledge the additional clarification in response to passenger feedback from the consultation, especially by clarifying the proposed staffing hours that passengers can purchase a ticket via MTiS. 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:

“Station staff are on hand to give advice and guidance. I use them principally to find the best and most convenient way to reach my destination, as that is not always possible online reading timetables.”

“Staff presence at a station is much needed, in particular for passenger who need assistance or reassurance.”

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:

“Not everyone is technology savvy, and not everyone has access to iphone/iPad/computer. What are these people to do when they need tickets – stand on a draughty platform?”

“I think this decision is terrible and doesn't support people who don't want to use technology. It's purely cost driven and doesn't consider people's experience and the support they need. I use the station to and always use the ticket offices rather than the self-service screens which are painful and difficult to use. The staff are incredibly helpful and pleasant to deal with and makes things so much easier.”

“There are many older people in Darlington who either don't have access to the Internet or don't have the skills to navigate successful ticket purchase and printing them off.”

Useability of Ticket Vending Machines

LNER's proposals place 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 many 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 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.

“On one occasion when my wife and I were travelling to York Races the ticket office was very busy and none of the 4 automated ticket machines were

working. The ticket staff were unflappable and were doing their best to deal with a huge queue, despite people getting upset at being delayed.”

“Ticket machines do not always work, and, even if they do, they do not always allow one to buy exactly the ticket one would like then and there. Further, it will make buying more unusual tickets like Rail Rovers impossible at a station, where help may also be needed from a person for making a reservation.”

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.

“Invariably when someone is using a ticket machine the process takes longer and they may require assistance.”

“As a South Yorks resident I have a travel card which allows me to purchase discount fares and also a senior rail card. Forcing me to use ticket machines which I am not familiar or comfortable using, will force me off the trains.”

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.

“Most ticket machines don’t accept cash. This discriminates against those on low incomes who use cash to help themselves budget and the elderly who may not have bank cards.”

Product range

Currently ticket offices provide access to a full list of products and services. TVMs do not sell/serve all of these. We note that LNER proposal states it is *“able to offer around [92%] of tickets currently available from a ticket office. A small percentage (8%) of ticket types (accounting for 2.3% of sales) will no longer be available from the affected stations.”*

LNER TVMs do not sell products such as Railcards, monthly or longer season tickets and National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion). Nor do they allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

“The products I use, almost exclusively, are Rover and Ranger tickets, but I read these will no longer be available to purchase here. When I use this station I most often purchase the West Yorkshire Day Saver ticket from the ticket office - this product, nor any other Rover/Ranger product, isn't available from LNER ticket machines.”

There are a range of products and services (refunds, season ticket changes, ranger and rover tickets, ferry/bus connections, park, and ride to name but a few) currently provided by the ticket office which may not be available from Ticket Vending machines.”

LNER's proposals stated:

- That stations will be staffed from first to last train and *“our customers will continue to have several options available to purchase a ticket”*. As a result, stations will see no change in the staffing hours You have subsequently clarified that at least one member of staff will be available to assist customers with ticket purchasing for the same hours as today, for a three month trial period.
- All multi-skilled station staff will be provided with training in relation to ticketing and the product range.
- There is a cash payment facility at each station.
- Some products not available at the station could be purchased online and/or at customer information centres.
- TVMs:
 - o You have analysed projected increases in ticket sales and are proposing that the existing TVMs have the capacity to retail tickets without any requirement for additional TVMs.
 - o You are planning improvements to TVM functionality. *“Flowbird and the Rail Delivery Group have been engaged to examine the potential of adding to the current functionality of the TVM fleet. They will be providing an update on this very shortly which you can then review and take forward. LNER is currently going through a retender of our entire fleet of TVMs. This tender process is near to being completed and released to potential suppliers with a view to having these new devices in stations in the FY 24/25”*.
 - o Your Accessible Travel Policy commits that if you are unable to buy a ticket at your starting station because you are unable to access ticket selling facilities, you are able to purchase your ticket onboard trains or

at the destination station. You will still be able to use your Disabled Persons Railcard or receive relevant discounts.

- There are also industry wide proposals to:
 - o 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.
 - o Offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead

We acknowledge that staff will be present at the same times as now at stations. We also acknowledge that they will be trained to help passengers buy tickets from digital channels, TVMs and MTiS.

However, we remain concerned with the following:

- i) Some core products and services will no longer be available at the station:*

You have decided not to retain the ticket office machine (TOM) or to provide mobile/hand-held devices that can provide full functionality.
- We note that some products could be made available on TVMs in future. However, this could not take place until the middle of next year and is still subject to funding – this is not guaranteed. There is also the question of how they would be provided until any upgrade - we do not think online-only or having to travel to a Customer Information Centre station to be a sufficient short-term mitigation.
- There are also products and services that will not be available from a TVM. We are particularly concerned that passengers will not be able to buy Railcards at stations (other than at the six Customer Information Centres outlined above). Railcards are a key way in which rail travel is made more affordable. While the majority may be fulfilled online, sales figures show there is still demand for them at stations – not everyone is willing or able to buy them online. If rail is to remain fully inclusive, it is unacceptable to offer only online options for these products or to require people to travel to the nearest 'hub' station.
- There is also no clarity on how cash refunds will be made at your stations in future – The National Rail Conditions of Travel state that if you bought your

ticket with cash you are entitled to a refund in cash. Other remaining issues include being able to change a booking/tickets.

- We also remain concerned about passengers who need to use cash. We acknowledge that there will be a TVM that accepts cash at each station, and that some products could be purchased on board the train. However, and as mentioned, it will not be possible to buy a railcard for cash. Nor is it clear how someone will be able to get a refund in cash at the station (as per the National Rail Conditions of Travel). It is also not clear how passengers without bank accounts would receive compensation if their train is delayed. We acknowledge that these issues exist today at stations where there is no ticket office. However, the TSA terms of reference refer to 'improvements in quality of service' and it is hard to see how removing cash services from more stations could be seen as an improvement.
- 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 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

Objection 1: We are not satisfied that passengers will retain widespread and easy access to key products at the station.

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now.

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

ii) Retail capacity at the station

While staff may be able to help people use a TVM, this will result in a higher demand on the existing TVMs.

We note your assurance that you have carried out an hour-by-hour breakdown (by station) of all tickets issued by TVMs including Ticket On Departures. You are confident that there is more than sufficient capacity to accommodate the increase in TVM sales. 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.

We 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. Introduction of a robust metric and reporting regime for TVM queuing (based on the existing standards at ticket office windows) would create a review mechanism – if queues exceed the targets then action would need to be taken (such as issuing staff with hand-held ticket devices so that they can 'queue bust' and/or installing extra TVMs). 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.

Conclusion

Objection 3: 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.

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. A reduction in staffing at stations would have an impact on disabled passengers' ability to 'turn up and go'. While in many cases staff on the train could assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

"Also there's many times I've gone in to the ticket office for help and now you say there'll be more customer service personnel around the station but as a disabled person they can be hard to find."

“I have been made aware of the above due to being a supporter of the Dogs for the Blind Charity. While I understand how the public in general buy their tickets etc, I cannot help being very concerned how the public who are disabled in one way or another and need help will find someone to assist them, ie partially sighted etc. They face difficult challenges in general, before arriving at stations. Will there be enough staff at the stations where this change is going to take place? Grantham is our local station.”

In addition to widespread concern in the consultation about a reduction in staffing levels 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.

“Blind and have a guide dog, upset about losing ticket staffs, cannot see ticket machine. often needs assisted travel, voice over on app not compatible. life is difficult as blind person, need helps.”

LNER’s proposals include:

- Stations will be open and staffed from the first to the last train. Assistance with ticketing will be available and Passenger Assist will always be available at stations. Therefore staff will continue to be available at stations to deliver booked and un-booked assistance for the same hours as today.
- You propose that multi-skilled staff will be positioned at designated welcome / meeting points in which the default position will be part of a repurposed ticket office. *“We wish to embark on a new strategy for ticket retailing whereby all our multiskilled station staff can contribute and assist customers with their requests. Where customers require specific face to face assistance we will have dedicated welcome points and/or Customer Information Points to act as focal points.”*
- The provision of assistance will be a core role priority for your multi-skilled staff.

We acknowledge 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.

Passenger assistance at LNER stations has not been reliant on the ticket office being open previously and this will not change. There is always a dedicated meeting point, clearly denoted by signage that has been made to be clear and easy to identify, near where staff are located. These locations are being reviewed as part of the changes and will continue to enable the provision of assistance.

We note the concept of the new ‘Welcome Point’ as a means of creating an alternative focal point at the station. We note that you plan to introduce Welcome

Points at repurposed ticket offices allowing more space for a designated accessible waiting area and meeting point.

We think there is merit in this idea but that there is much that still needs to be developed in terms of how the new Welcome Point arrangements would work in practice. For example, in how people will find a staff member if they are not at the Welcome Point or alert staff they need help, whether an induction loop will be provided, what queuing arrangements will apply if several people want help at the same time, and how visually impaired passengers would know that someone offering to help was a genuine member of staff. It is clear from the consultation that passengers value staff and want clarity and certainty on how they can find them at the station.

However, as it stands there is lack of clarity and detail on this proposal. We are seeking 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 (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”. 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 new welcome point concept is a fundamental change for passengers, especially disabled passengers, so it is important that they work in practice and that passengers have confidence in them. It was clear from the consultation that accessibility, particularly the availability of staff to provide assistance, was a key area of concern. Therefore, we believe they must be piloted/trialled to establish what works best at different types of stations and how passengers react to them. Proposals on ticket offices would need to await the outcome of these pilots.

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 new 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 particularly value the information provided by staff at a station. Reducing the hours staff are available or making it harder to find them, would make it harder for passengers to access advice and information from staff.

“I’m at this station regularly to travel to London and the ticket office is used, there is always a member of the public at the desk, it’s not just a ticket office it’s for advice too, I don’t believe you have the number of platform staff to provide the service required, without a safety risk to customers.”

“The ticket office staff are an invaluable source of information and help in relation to the purchase of tickets and when there are problems with e.g. travel on the day, as well as with faulty/confusing ticket machines. I understand from the proposals that the 'additional help' to be provided around the network will not be as extensive as that provided by the ticket office staff, which is a concern for me.”

Your proposals include:

- Stations will have a permanent staff presence. Most stations will see no change in the staffing hours. Therefore, staff will continue to be available at stations to provide information for the same hours as today. If customer requires a printed travel itinerary, this will still be able to be provided.
- However, there will be a reduction in the overall number of staff at four stations: Darlington, Grantham, Retford and Newark Northgate.

We acknowledge the commitment to maintain the staffing times as they are now. Staff in the new multi skilled roles will be present for the same times/hours as existing ticket office staff. You believe that this should ensure that passengers have access to journey planning and disruption information as now.

We have raised concerns at the reduction in staffing levels at stations. LNER responded stating *“With our multiskilled staff being deployed at all key touchpoints across the station they will be more visible to our customers. Previously, staff in ticket offices were only visible to customers who used that facility and now they will be more accessible in all high profile locations of our stations. Given our experience, we have a forensic understanding of our stations and will ensure that our people are where our customers need them. We plan to deploy our staff using the HICAs method (High impact customer Areas) using reception desks/customer information*

offices as a main focal point/heart of the station. So although there will be 'less staff than present' we believe that our multiskilling model will be more efficient than current arrangements and will provide a better overall customer proposition."

Conclusion

We are satisfied that staff will be able to provide the same level of journey planning information as now, including during periods of disruption. **No Objection.**

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:

"I regularly commute, and I see that the ticket offices provide a vital service in advisory and safety roles. When the service is in chaos it is the only place you will get information on your journey."

"Your closure of the ticket office will essentially make it impossible to use the railway as I would not be able to be provided with the assistance required to not have episodes of panic when using the service because I don't understand the situation, wouldn't have the timetables nor support of the station ticket staff when planning and using the services."

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 include:

- Stations will have a permanent staff presence. All stations will see no change in the staffing hours but there is a proposed reduction in staffing levels. However, staff will continue to be available at stations to provide information 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 being on the concourse rather than in a ticket office) could improve perceptions of safety.

Conclusion

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

Recommendation 2: 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.

"We need the expertise of ticket office staff to help us find the correct routes and tickets (deeply confusing and now the addition of 'split tickets' makes it even more unintelligible). Your customers also need a helping hand when they arrive at the station to guide, assist and protect them."

LNER's proposals stated:

- The proposals do not change the hours during which stations will have a permanent staff presence. Stations will see no change in the staffing hours.
- LNER Revenue Protection Policy, provides assurance regarding the circumstances where it is acceptable to board a train without a ticket. These cover the various situations which could arise from proposals on closing ticket offices, and provides appropriate confidence that tickets can be purchased onboard as required.
- LNER intend to do a full communication programme for frontline colleagues to ensure they are all fully conversant with any changes, ensuring that the approach to protecting revenue reflects any changes brought about by the proposals relating to Travel Centres. In conjunction with this, LNER will review the revenue protection information on their website to confirm that no contradictory advice is provided to our passengers.
- Customers holding a Disabled Persons Railcard (DPRC) can buy tickets on board the train at the same price as at a station so will not be penalised.

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, there are several tickets that may no longer be available from a station. 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 the 'missing' ticket from a 'hub' station or onboard the train.

As part of the changes to ticket offices we note that LNER will be conducting a thorough review of signage at all stations which LNER manage to ensure they provide a consistent message to any passenger using that location. A key element of this review will be on ensuring that any revenue protection related messaging is fully reflective of our approach in this area. This review would be undertaken in conjunction with other Operators who use our stations, especially those who apply a Penalty Fare regime, to ensure consistency.

Conclusion

We are satisfied that the proposal should not create any additional risks for passengers. **No objection.**

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

In our letter of 6 September we expressed concern at instances where facilities such as waiting rooms, toilets (including accessible toilets), and lifts could/would be closed because there was no member of staff to open them. We were concerned that any changes to ticket retailing at stations should not result in any reduction in access to key passenger facilities. Station facilities such as waiting rooms, lifts and toilets are important to the customer experience for many passengers, while for some passengers they are an essential in enabling them to travel by train.

LNER's proposals state:

- All stations affected will be open and staffed from the first to the last train.
- It also means that staff will continue to be available to respond to any alarms (for example the alarm in the accessible toilet) for the same hours as today.

Conclusion

We are satisfied that the commitment to maintain original staffed times will mean passenger 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.

We note that you will adhere to the staffing principles contained within the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – that protects those customers most in need of in-person support and assistance.

The ATP mechanism could be a mechanism for future engagement but we feel that it may require modifications to the existing 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.

LNER propose to *“always have a minimum of 1 staff member available using MTiS for the current opening hours of the relevant Travel Centres. We will undertake a 3 month trial using these hours to assess the volumes and customer feedback.”*

After the three-month trial period further changes could be made without any appropriate consumer protection measures being in place. We believe that there needs to be a commitment/process in place before changes can go ahead.

Conclusion

Objection 6: 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].

Short term mitigations proposed by LNER include the use of MTiS and Customer Information Centres. For short term 'quick wins' which can be offered on TVMs, these can be completed before the implementation of the ticket office change. We recognise your position that it is not known at this stage, whether the cost of implementing the necessary mitigation measures would prove to be value for money and that you feel that even prior to any mitigations being implemented the proposals represent a step up in the quality of your staff and customer proposition.

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. Passengers will need to be guided through the mitigations.

Conclusion

Recommendation 3: It will be essential that there is a clear, co-ordinated communication plan to inform passengers should any changes go ahead.

iii) Monitoring and review

We do not think there has been enough focus in plans on reviewing and monitoring changes should they go ahead. There is a need to assess whether mitigations have been delivered and, crucially, whether passengers feel the new arrangements are working. This would require research with passengers and a series of metrics designed to monitor the impact.

As stated earlier, we think this must include queuing time metrics at Ticket Vending Machines. A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct. This regime must be in place before any changes took place.

Conclusion

Objection 7: 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: We are not satisfied that passengers will retain widespread and easy access to key products at the station.

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now.

Objection 3: 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 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 new Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

Objection 6: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

Objection 7: There must be a robust monitoring and review mechanism in place to review any changes. This must include queuing time metrics.

Station	Decision	Grounds for objection (see text above)
Berick-Upon-Tweed	Objection	1, 2, 3, 4, 5, 6, 7
Durham	Objection	1, 2, 3, 4, 5, 6, 7
Darlington	Objection	1, 2, 3, 4, 5, 6, 7
Wakefield Westgate	Objection	1, 2, 3, 4, 5, 6, 7
Retford	Objection	1, 2, 3, 4, 5, 6, 7
Newark Northgate	Objection	1, 2, 3, 4, 5, 6, 7
Grantham	Objection	1, 2, 3, 4, 5, 6, 7

Transport Focus
31 October 3033

Annex

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

Annex 1: Total objections received for LNER

Station specific objections:

Berwick Upon Tweed	809
Darlington	512
Durham	760
Grantham	316
Newark Northgate	264
Retford	200
Wakefield Westgate	679

Total 3540

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

Doncaster	294
Edinburgh	307
Newcastle	742
Peterborough	159
York	595

In addition to the 3540 station specific objections listed above Transport Focus also received 30,070 responses objecting to LNER's proposals in general.

Total LNER objections: 35,707

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 LNER's proposals:

Berwick Upon Tweed	3808
Durham	43
Grantham	6
Newcastle	2
Wakefield Westgate	463

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.