

By email

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Dear Angela

### **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](#) 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?*
- *Do you have any forecast of the impact on revenue – i.e. in how many people will no longer travel as a result or who will travel without paying?*

Without evidence to the contrary, we must assume that many people will continue to want advice and support at the station and not migrate to digital channels. However, there are still concerns at the ability to sell the expected number of tickets displaced from the ticket office, especially at peak hours. The data you provided on TVM issues demonstrates some challenges if those passengers previously buying from ticket offices were in future to buy from TVMs.

For example:

- Bolton - (ticket office reduced hours) peak hours Monday-Friday and AM Saturday
- Bridlington - AM Monday-Saturday
- Keighley - peak AM Monday-Friday and AM Saturday
- Wigan Wallgate – (ticket office reduced hours) AM Saturday.

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

*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 location of TVMs been carried out – are they in the right place to best meet demand?*
- *What mitigations do you have 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?*

- *Is it a reasonable mitigation where a person can no longer purchase a specific ticket to instead have to travel to one of the remaining stations with a ticket office to purchase one? Do you have alternative mitigations proposed?*
  - *What assessment have you made of the impact of seasonal peaks, especially at tourist destinations such as Windermere?*
- *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 seat reservations (without purchasing a ticket at the same time)
    - Season tickets (longer than weekly)
    - Railcard Sales (National and regional)
    - Refunds
    - Car parking tickets
    - Esk Valley Railcard
    - Dales Railcard
    - Sleeper bookings
    - Merseytravel Trio
    - South Yorkshire Travelmaster
    - Cycle reservations
    - TFGM Countycard
    - Warrant payments
    - London International (CIV) destination.

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
- Changing a booking/tickets
- Use of rail vouchers
- Use of rail warrants
- Ferry connections (some, inc Ireland and Isle of Man)
- Group Save
- Off-peak purchases before the off-peak begins
- Photocards for season tickets
- Scholar tickets.

This would represent a significant drop 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. From the proposal

documentation, we note that you state that Duo and Plus Bus tickets will be available to purchase from your TVMs.

*Questions:*

- *Are there any other products passengers will no longer be able to get from your stations following closure of the ticket offices?*
- *How will passengers access these products and services in future?*
- *We are aware Northern TVMs were upgraded in 2021. Do you have any plans to further upgrade TVM functionality and if so, what would this cover and when would it be complete?*
- *Will staff be able to access a ticket machine, or be issued with handheld machines to sell tickets not available from the TVM?*
- *How can passengers have confidence that this is not a precursor to withdrawing some of these products?*

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 perhaps via remote/video assistance – 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 an older or 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)?*
- *Following your recent TVM video assistant trial in your East region, what were the findings and are there plans to roll this out more widely?*
- *Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability e.g. protected from the weather- rain/sun for both passengers and the TVM.*
- *What consideration have you made to relocate TVMs to a more accessible position if necessary?*
- *How accessible is your app and your website, especially for those with a disability?*

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? Please include 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 specialist retail advice/help*

At some stations the proposals would 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:

- It is proposed that both Windermere station and Hebden Bridge station will no longer be staffed on Sundays, a popular day for tourists and holidaymakers who may need help navigating the timetables and ticketing options.

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.

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:

- Broad Green station is currently staffed 05:35-23:59 Monday to Saturday and 08:05-23:35 on Sunday. It is proposed it will be staffed 07:00-09:00 Monday to Friday, 10:00-12:00 on Saturday and unstaffed on Sunday. This is a reduction in time with a staff presence at the station from 126 hours to 12 hours per week.
- Buckshaw Parkway station is currently staffed 06:00-00:10 Monday to Saturday and 0815-2345 on Sunday. It is proposed it will be staffed 0700-1100 Monday to Friday, 0900-1300 on Saturday and no hours on Sundays. This is a reduction in time with a staff presence at the station from 124 hours to 24 hours per week.
- Garswood station is currently staffed 0600-2345 Monday to Saturday and 0800-2335 on Sunday. It is proposed it will be staffed 0930-1130 Monday to Friday, 1230-1430 on Saturday and no hours on Sundays. This is a reduction in time with a staff presence at the station from 122 hours to 12 hours per week. This proposed role is also a roving position.
- Hazel Grove station is currently staffed 06:05-19:00 Monday to Friday, 07:00-20:00 on Saturday and 09:00-16:00 on Sunday. It is proposed it will be staffed 06:00-13:00 Monday to Friday, 09:00-16:00 on Saturday and unstaffed on Sunday. This is a reduction in time with a staff presence at the station from 85 hours to 43 hours per week.
- Menston station is currently staffed 06:15-19:00 Monday to Saturday and 09:15-16:30 on Sunday. It is proposed it will be staffed 07:00-12:00 Monday to Friday, 09:00-14:00 on Saturday and unstaffed on Sunday. This is a reduction in time

with a staff presence at the station from 84 hours to 30 hours per week. There are many more like this.

Even where staff will still be present at the station, it's not always clear if they will have sufficient expertise to help passengers navigate the complex fares system. In contrast to many other self-service retail situations, for example a self-checkout at a supermarket, many passengers will need support not just to use the ticket vending machine (TVM), but also to understand what they should purchase. 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. This is relevant for all passengers, but especially disabled passengers/those requiring assistance.

*Questions:*

- *What rationale was used for determining which stations were classed as hub stations, for example Glossop?*
  - *How do you intend to brand the hub so passengers understand their role as a ticket office?*
  - *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? How comparable will this be with the training previously given to 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 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, in the 2022-2023 financial year the proportion of ticket office transactions that used cash were:
    - Barnsley 43 per cent
    - Blackburn 50 per cent
    - Glazebrook 64 per cent
    - Mexborough 40 per cent
    - Rochdale 39 per cent

- St Helen's Central 47 per cent
- Thorne North 48 per cent.

Where there is no alternative cash retail option at the station, many of these passengers will have to purchase onboard the train or at their destination. This risks a worsening of the customer experience for these passengers and potentially lost industry revenue.

*Questions:*

- *If a person cannot pay by cash will your Promise to Pay signage at stations and on social media be clearly posted to inform passengers about this?*
- *Have you assessed the risk of worsening punctuality on some routes if the guard is busy retailing tickets on board instead of being ready to open the doors at stations?*
- *How will passengers with cash be able to buy the products listed above (page 3)?*
- *Do you have any forecast on the impact on revenue of those passengers who get a Promise to Pay as they pay by cash, don't come across a guard on board and alight at an unstaffed station?*
- *In your proposal you state that at your gated stations it will also be possible to buy a ticket using cash before getting through the gateline. Can you confirm that gateline staff will proactively sell tickets both before and/or after a journey? Often, gateline staff will sell tickets at the end of a journey, for example, at unstaffed stations, where there is no TVM, passenger has Promise to Pay etc, but not necessarily prior to boarding a service.*
- *What reassurance can you give that gateline staff will sell a ticket to a passenger prior to them boarding a service rather than directing them to a TVM instead?*

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

It is clear that Northern's proposals will result in many stations no longer having staff for significant periods of the day during which there is currently a ticket office staff present.

We also note that at some stations there are other staff (gateline and dispatch) that act as a source of assistance and can provide support for disabled people who want to turn-up-and-go, but at stations where overall staff presence has been reduced disabled passengers' ability to 'turn up and go' will be impacted. While in many cases staff onboard the train may be able to assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in relation to safety and security, providing information and providing assistance and support.

Questions:

- *In your proposal you state that ‘during advertised staffing hours of stations our teams will be available to help you like today’. When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?*
  - *If this is reliant on conductors 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 conductor if they haven't pre-booked assistance?*
  - *If the mitigation is as now, via Passenger Assist, how long will people have to wait? Do you have any evidence on 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?*
  - *Do all stations have tactile paving fitted along the entire length of each platform face – the need for this is increased if the station is to have no or less staff in future? If not, which stations do not have this?*
  - *For those stations with barrow crossings such as Thorne North and Ulverston, you propose that conductors will be trained on how to use them. What timescales do you expect for training to be rolled out and what impact will there be to the passenger experience as a result of the change?*
  - *Taking into account the above, have you considered if schedules will be impacted for example, delays to services?*
- *What assurances can you give to disabled passengers who want to ‘turn up and go’ that they will still be able to do that in future without jeopardising independent living.*

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

However, a number of questions have been raised during the consultation about how this help will be provided.

Questions:

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



- *Roving staff – for those stations where a roving staff member will be deployed for perhaps 2 hours per day, how can you assure there will be a staff presence at the advertised times for the duration of the shift? As previously stated, this is particularly important for disabled passengers who may wish to turn up and go.*
- *Following on from the above, what contingencies are in place if a roving staff member isn't available or gets delayed during a shift?*

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:*

- *What evidence can you provide on how staff moving out from ticket offices will make them more visible and available to passengers and improve the customer experience?*
- *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, how quickly calls are answered and the response time to faults? What future commitments can you give?*
- *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?*

**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 signage be reviewed 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?*
- *Those facilities for which you are seeking funding, can you give any indication of when this will be secured along with its subsequent implementation?*
- *If facilities are to be open when staff have been withdrawn, how will it be ensured they are not subject to misuse or vandalism and will be maintained in good condition?*
- *We understand that alarms for accessible toilets are often located in tickets offices. Is this the case and, if so, where will these be fitted? How will someone be alerted in future?*

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

Where proposals reduce or remove staff presence at stations this risks making passengers feel less safe. Removal of staff in the evenings and particularly Sundays, as is the case in a number of proposals, seems very likely to result in increased concern about personal safety. We also note that at some stations there are other staff (gateline and dispatch) and that 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 and particularly what arrangements have been made to provide staff cover when a roving staff member is unavailable for any reason?*

- *Timing of mitigations*

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

Questions:

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

- Liaison with other operators

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

Questions:

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

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

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

Yours sincerely

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Head of Policy

Copy to:  
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