

## **South Western Railway's proposed changes to ticket offices: Transport Focus response**

### **Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement**

#### **1. Introduction**

This letter is Transport Focus's formal response to South Western 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**

South Western Railway (SWR) published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 41,975 representations objecting to SWR's proposals and 59 representations supporting SWR's proposal.

Transport Focus used information provided by SWR 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 cost of delivery, but we recognise that there could be efficiency savings within proposals.

On 6 September we raised concerns with the proposals and asked a number of clarification questions based on our initial analysis and from the main themes seen in

the public responses at that point. The response proposed some enhancements to your original proposal.

Transport Focus acknowledges that SWR has made significant improvements to its original proposal, especially in reinstating staffing hours at stations and maintaining the current ticket retailing capability at all stations. However, having analysed these revised proposals we still have concerns. Some of these are specific to SWR stations but most are generic issues at an industry-wide level that are relevant to all operators. These are set out in detail below. We are willing to continue engaging on these, but they have not yet been resolved. As a result we must object to proposals at **all** SWR stations. A full list of stations is provided at the end of this letter.

The main reasons for this are:

- Welcome Points

In response to concerns about how and where to locate staff assistance on arrival at any station, SWR proposed that Welcome Points will be developed at stations as an initial focal point that provides any customer who needs support and/or advice a place to start their journey. We think there is merit in this idea but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the Welcome Point and needs assistance and whether induction loops would be fitted.

Welcome Points were not explained as part of the original consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and to gather passenger feedback.

- Queuing standards at Ticket Vending Machines

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for Ticket Vending Machines (TVMs). This could be based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken (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 expectations not be correct.

- Retail capacity

We believe that additional specialist retail resource should be provided at Bournemouth, Guildford, Havant, Salisbury, Southampton Central and Winchester.

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 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 network-wide level, in other words, 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 41,975 objections to SWR's proposals.

The top three themes in responses were concerns over the ability to buy tickets in future (including difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. The common theme running throughout responses was the role, and value, of staff in delivering all of these.

In addition, we received 93,185 network-wide objections opposing changes across all stations.

We also received many responses from stakeholders including MPs, local authorities and representative organisations.

More detail can be found in Annex 1.

We also received 59 representations supporting SWR'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 (SofS) for a decision. The Department for Transport has previously published [guidance](#) setting out the approach the SofS would take in these circumstances. This guidance states that the SofS is “content for Transport Focus and the Operator to continue discussing the proposal, including amending it, if that would enable an agreement to be reached. If the matter is referred to the SofS, the SofS will decide whether the objections are valid or not; i.e. whether 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 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. SWR replied on 27 September. These letters are attached as Annex 2 and 3.

SWR's original proposal was to:

- Close all ticket offices and transition staff to new multi-skilled roles.
- All currently staffed stations would remain staffed but with levels of staffing differing according to a station categorisation:
  - 24 category 1 stations – multiple staff with full ticket office retailing capability and expertise available to support retail choices and other customer needs until full transition to digital.
  - 33 category 2 stations – at least one member of staff, with more at busier times. Ticketing via a Ticket Vending Machine (TVM).
  - 97 category 3 stations – one member of staff but only at set times. Ticketing via a TVM.
- Video-calling capabilities on TVMs at 91 locations, mostly at category 3 stations. This will allow customers to see and interact with a member of staff at SWR's video call centre.

- If a passenger is unable to buy a specific ticket before boarding the train because it was unavailable at the station, they would be able to buy one during their journey or when they reach their destination without penalty.

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

- You stated that you were “no longer looking to materially reduce staffing hours. When a customer arrives at a station, there will be staff available who are able to assist in purchasing a ticket using digital means or a TVM.”
- You will temporarily maintain the current ticket retailing capability at all stations until suitable alternative means of purchasing products and services are available. This would ensure access to products and services currently bought through ticket offices that are not available through digital means or TVMs.
- Additional TVMs would be provided.
- You are, “Alongside the rest of the industry... exploring the option to bring in Welcome Points at stations”.

We acknowledge that you have made significant changes to your original proposal in response to passenger feedback from the consultation, especially in reverting to existing staffing hours at stations. 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.

*“Along with many, many people in our lovely community we rely on Sherborne ticket office and its staff to help us arrange our journeys and the tickets needed.”*

*“Those of us who are not elderly or disabled and can book online still largely prefer human contact from a staffed ticket office because we cherish in-person interaction when things go wrong or we need advice.”*

*“The staff are so knowledgeable and able to quickly answer queries and provide the correct ticket, which gives me more confidence when getting on the train – so much more reliable than an AI, chatbot machine! I think it also helps to give people a sense of security when going to the station that there is someone there who can help, especially if you are a female travelling alone or someone with a disability.”*

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:

*“As a regular rail traveller, it is my personal experience that the self-service ticket machine is virtually impossible to use and often just doesn't work. Buying tickets "online" is not a pleasant experience as, in most cases, it is not possible to discuss/explore alternate travel options and easy to make mistakes.”*

*“I prefer to buy a ticket from a person, as I am not very good with machines, and do not purchase tickets online. Without the ability to buy a ticket from a ticket office, it will severely impede my access to train services.”*

*“It is unrealistic to expect people not familiar with train travel, the elderly, those without computers, to buy tickets online or via the station ticket machine. I have used the railways for 40 years and still get nervous about buying any ticket online or via the machine. These methods are not user friendly; and are not clear. It is extremely easy to overpay for a ticket given the myriad of ticket options.”*



### *Useability of Ticket Vending Machines*

SWR's original 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 TVMs 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:

*“The Christchurch ticket vending machine is positioned in such a way that sunlight renders the screen invisible. It must be moved onto the platform if this is going to be the only way to purchase paper tickets.”*

*“Ticket machines are unusable when the sun shines directly on the screen so you cannot see anything for the reflection and also when rain spattered the touch screen doesn't work.”*

### *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.

*“There are often queues at the machine. It only takes one incompetent person to seize up the whole queue. There are many elderly people here, often hopeless at technology.”*

*“Many retired local people pop up to town for concerts or theatre. They don’t want to miss the train because of a malfunctioning machine or a queue. You might lose this trade.”*

*“Ticket machines are regularly out of order – what plan is there to ensure they are better maintained? Combine this with aggressive revenue protection officers on trains and at barriers makes it more likely people will miss trains that are already often late and unreliable as they have had to queue for longer when one of the ticket machines is out of action.”*

### **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.

*“I am writing on behalf of my elderly mother... she prefers to use cash. I cannot buy advance tickets for her to collect, as the ticket machine requires the purchasing card and I will not be there to do that. This can currently be done from a ticket window, although normally she just talks to ‘the nice man at the station’ who sorts it all out for her. If there is a problem with the cash facilities at the station’s machine, how will she purchase a ticket before travel (notwithstanding the previous comments about advance tickets). Cash remains legal tender and therefore must be accepted at all times.”*

### **Product range**

Currently ticket offices provide access to a full list of products and services. TVMs do not sell/serve all of these. For example, SWR’s TVMs do not sell products such as Railcards, or the national concessions for disabled people (for wheelchair and visually impaired passengers plus a companion). Nor do they provide seat reservations, allow you to change tickets/bookings, use rail vouchers or provide a

means of obtaining a cash refund. At present these are available at the ticket window.

*“The machine apparently offers a confusing choice of tickets and does not always produce the best results i.e., a rail card cannot be used on an open return ticket. This I found out when a kind person helped me recently with my one and only encounter with said machine. Fortunately the ticket office resolved the problem.”*

Your proposals (as revised) sought to address these points:

- Your letter of 27 September states that you are no longer looking to materially reduce staffing. You subsequently confirmed that all 86 SWR stations in Transport Focus’s area will see no change to retailing staffing hours – meaning they will revert to the existing ticket office opening times.
- You will temporarily maintain the current ticket retailing capability at all stations until suitable alternative means of purchasing products and services are available. You subsequently confirmed that you will empower your staff “to offer the appropriate service, recognising that sometimes this may include using the tablet to retail a fare which is available digitally or through a TVM. As an example, retailing a senior citizen’s Railcard to a customer using the tablet, rather than supporting them purchasing digitally.” And that staff would use this equipment to queue-bust when TVMs are busy.
- TVMs:
  - o You are procuring an interface upgrade from your TVM supplier. This will improve the machine functionality, the customer experience and the range of tickets offered. The new user interface will allow passengers to plan their journey, obtain real time train running information and purchase a wider range of tickets including Advance purchases and Rovers and Rangers.

You are currently testing the functionality at your Basingstoke test suite and plan to roll this out, pending successful testing, to five live TVMs by the end of the year. You expect this to be completed during rail year 24/25.

- o You are also discussing other upgrades. Timescales for this are to be confirmed.
- o All SWR stations in Transport Focus’s area have a TVM that will accept cash.

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this will ensure that there is a member of retail staff present at the same times as now at most stations. We also acknowledge that retaining the existing ticket office sales equipment will ensure that products not available online or via

TVMs will still be available at the station, especially for those reliant on cash and/or who do not have access to the internet.

However, we remain concerned with the following:

i) *Product range at stations*

We note your reference to the retention of existing sales equipment being a temporary mitigation that would remain in place until suitable alternative mitigations are in place. We believe it is a basic principle that access is maintained for those who are non-digital and/or cash based. Any 'suitable alternative mitigation' would need to ensure this safety net is maintained and be subject to consultation prior to implementation.

We also note that you will offer passengers the "appropriate service... recognising that sometimes this may include using the tablet to retail a fare which is available digitally or through a TVM." We understand that different options will suit different people, but we believe it important that the tablet is not seen as a last resort. Subject to this important caveat we acknowledge that this mitigation should ensure that passengers have access to products at the station.

We would also ask how SWR will make passengers aware that the existing sales equipment is being retained. If this is to be an 'on request' option, then passengers will need to know that this exists and that they can request certain products and services. We believe this requires further clarification and discussion.

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

## **Conclusion**

**Recommendation 1:** SWR refer to temporary mitigations (for the unbanked and digitally excluded) remaining in place until 'suitable alternative mitigation' is found. We believe it is a basic principle that access is maintained for those who are non-digital and/or cash based. Any move from the 'temporary mitigation' must be conditional on this and be subject to consultation.

**Recommendation 2:** That DPTAC, disabled people and representative groups should be involved in any discussions to replace the national concessionary fares for disabled passengers with an alternative product.

*ii) Retail capacity at the station*

We acknowledge that you will be procuring six new TVMs and relocating 16 other TVMs to ensure sufficient coverage. You provided combined ticket office and TVM sales data (on a confidential basis). From this we feel that there are still pockets of high-demand that will stretch the ability of TVMs to absorb sales displaced from the ticket window. This makes it all the more important that staff actively use the retained station ticket equipment to queue-bust at busy periods.

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. 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 forecasts not be correct.

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

While you committed to monitor TVM usage you had no plans to introduce queuing targets unless they were adopted at an industry level.

**Conclusion**

**Objection 1:** Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

*iii) Retail staffing hours*

The Rail Minister said: “the Secretary of State and I have been clear in our expectation that no stations that are currently staffed will be unstaffed as a result of the reform. I have made the additional point about the hours not changing

materially either, with staff still being there to provide assistance and additional support for those who need and want it. That would include advice on tickets and assistance in buying them.”

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

### **Conclusion**

**Objection 2:** Additional specialist retail resource should be provided at Bournemouth, Guildford, Havant, Salisbury, Southampton Central and Winchester.

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

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

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in providing assistance and support. In the original proposal many stations would have seen a significant reduction in staff presence. This would have had an impact on disabled passengers’ ability to ‘turn up and go’. While in many cases staff on the train would have been able to assist passengers on and off the train, they were unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

Comments received during the consultation included:

*“Having to roam through the station to find staff means I would not be able to access the assistance I need in a timely and easy manner, if at all.”*

*“I would therefore have to rely on Help Points which are not always accessible to me, and often do not work. Even when they do, they do not provide a comparably ‘personal service’ to disabled passengers. If I am not confident I can arrive at the station, identify a member of staff, and receive the assistance I need in a timely and easy manner, I will be unable to travel from this station.”*

*“I also have a friend who is registered as blind and she is horrified of the danger of losing the ticket office staff. She knows exactly where the ticket office is located and feels safe in using the station. Imagine her trying to locate staff to assist her in buying her ticket.”*

*“I feel that I must also include my wife in this e-mail as she has impaired vision. She loves her independent days out travelling by train. All I do is take her to the station and leave her to go to the ticket office to get her ticket from the very helpful staff. Please do not take this pleasure away from her.”*

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

*“I do believe that I will be at a disadvantage to other passengers due to this decision, as due to my age I simply would find it impossible to personally buy tickets any other way; and due to my frailty, I would be unable to chase a staff member around a station. I believe this would impinge my rights under the Equalities Act.”*

*“How does wandering round the station looking for more-or-less easily located staff enhance the travel experience, especially for the elderly and vulnerable, or those with children or heavy luggage or physical disabilities?”*

*“We don’t want to have to walk all round the station to try to find someone. If they are the other side, there would not be time to cross and return.”*

Your proposals (as revised) stated:

- You are reverting to the original ticket office staffing hours at all SWR stations in Transport Focus’s area.
- You are, “Alongside the rest of the industry exploring the option to bring in Welcome Points at stations”. You subsequently said that these would likely be placed in booking halls and that you were involved at an industry level on the concept and design of these.

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

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

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

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

- A mechanism for alerting staff that you are at the Welcome Point and need assistance, at each station. It should be clear that this is for all passengers and not just those with a disability.
- A mechanism of informing people that the Welcome Point has shut (for example, to avoid people waiting there after staff have gone home or where the staff member is ill/off work. This happens at a ticket office by virtue of the blind being closed).
- Clarity over what services/support will be provided to passengers (for example, would this also function as the meeting point for passengers who have booked Passenger Assistance).
- Whether induction loops would be fitted.

It is an important principle that people affected by a proposal should have a say on that proposal: “nothing about us without us”. Welcome Points were not explained as part of the consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. To that end we believe it is important that there is further engagement with DPTAC and with disabled people and representative groups on the concept, design and implementation of these Welcome Points.

The Welcome Point concept is a fundamental change for passengers, especially disabled passengers, so it is important that they work in practice and that passengers have confidence in them. Therefore, we believe they must be piloted/trialled to establish what works best at different types of stations and how passengers react to them. Proposals on ticket offices would need to await the outcome of these pilots.



## Conclusion

**Objection 3:** We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

**Objection 4:** We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

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

It is clear from the public consultation that passengers value staff at a station. Reducing the hours staff are available or making it harder to find them, would make it harder for passengers to access advice and information from staff.

*“The staff are helpful and knowledgeable and ensure that the customer gets the cheapest ticket for their journey. They also advise on times and connections. I would not feel confident using the on platform machine. It may be fine for an uncomplicated journey such as a day return to Exeter Central but it can’t advise on a more complicated journey such as visiting my daughter in Shrewsbury or my friends in various locations.”*

*“I have always bought my ticket at the ticket office. Not everybody has a computer to buy tickets online. And not everybody can cope with the ticket machines (myself included) quite apart from the fact that at times the screen is totally invisible when the sun is reflected in it. Even more important: Machines can't answer questions; even an online 'helpline' hasn't got all the answers (always assuming that one knows how to ask the question in the first place).”*

*“We had need to visit the ticket office at New Milton station because we were not able to obtain sufficient detailed information from the internet regarding the tickets we needed to purchase. Without the advice that a ticket officer was able to provide to questions we posed we would have: Overpaid for the tickets because the website provided insufficient flexibility. We would not have been able to renew and use immediately our Senior Rail Cards. We feel and we believe that we are far from alone in needing the assistance of a human being.”*

Your proposals (as revised) stated:

- You are reverting to the original ticket office staffing hours at all SWR stations in Transport Focus's area.

We acknowledge the commitment to maintain the original retail staffing times. We believe that this should ensure the same level of access to staff for journey planning and disruption information as now. However, we have earlier questioned whether there is enough staff resource at Bournemouth, Guildford, Havant, Salisbury,

Southampton Central and Winchester. This would also apply to ensuring passengers can easily access information.

## Conclusion

**Objection 2 applies again:** Additional specialist retail resource should be provided at Bournemouth, Guildford, Havant, Salisbury, Southampton Central and Winchester.

## 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 also feel that my local station feels safer when the office is manned. The office manager is visible and is a point of contact if there is a problem.”*

*“If there is a dedicated and universal place that people can find a member of staff when they are in a situation where their or another’s safety is compromised they are better able to access it. Staff who move about in a large open space that is often crowded or help points which are difficult to identify and could be located anywhere on an unfamiliar concourse are not user friendly. At a time when particularly women’s safety is in the spotlight this seems like a move in the opposite direction.”*

*“It will also be safer for the staff to be behind glass and not in the station, which in Weymouth, sometimes has a problem with anti-social behaviour. I fear the staff will not like being out of the office and vulnerable so may not be easy to find.”*

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

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

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

Our research also shows that personal security is a higher priority among women and disabled passengers. In 2022 we worked with Transport for the West Midlands to better understand the experiences of women and girls when travelling on public

transport\*\*\*. Our colleagues at London TravelWatch also looked at personal security on London's transport network\*\*\*\*. It also found that women and disabled users were more likely to feel unsafe.

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

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

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

Your proposals (as revised) stated:

- You are reverting to the original ticket office staffing hours at all SWR stations in Transport Focus's area.
- The Department for Transport and British Transport Police have agreed that you should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.

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

## Conclusion

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

**Recommendation 3:** There should be no implementation of proposals until the crime and vulnerability audits mentioned above have been completed and any necessary actions have been implemented.

## 6e) Passengers are not penalised if they cannot buy the ticket they require from the station

In our letter of 6 September we were concerned that relying on TVMs that are not fully accessible, or do not sell the full product range could mean more passengers are unable to buy the ticket they want before they board the train. This could result in

people having to buy the 'wrong' ticket or risk being penalised for boarding without a valid ticket.

*"If the machine is not working or there is a queue...the alternative is to jump on the train to buy a ticket from one of the commercial guards. Whilst this is often possible (and they are generally nice and accommodating about it) sometimes there is no commercial guard, their machines are not working, the signal required for card payments is not available because of bad network coverage and it is simply not possible. You then risk being fined at Waterloo whether you have a valid reason or not and are actively trying to pay your fare rather than trying to evade payment. I know several people who have been unfairly fined in this way."*

*"If a passenger boards a train without a ticket they are now automatically presumed 'guilty' of intention to evade payment and fined £100 – there have been many notices threatening this for some time. If tickets are impossible to obtain because the ticket machine is not working or not selling the ticket they are entitled to, or the queue is too long etc etc. why should they pay a fine for the inadequacies of the ticketing system?"*

Your proposals (as revised) stated:

- You are reverting to the original ticket office staffing hours at all SWR stations in Transport Focus's area.
- You will temporarily maintain the current ticket retailing capability at all stations until suitable alternative means of purchasing products and services are available.
- SWR intends to work closely with other train operators to align signage messaging.

We again acknowledge that you are reverting to original staffing hours and providing the means to purchase the full range of tickets at the station. This means that passengers should have the same opportunity to buy a valid ticket before boarding as they do now.

We would reiterate calls for the introduction of a queuing time metric at TVMs. This would give assurance at those stations where there are larger volumes of sales to absorb onto TVMs. It would ensure there is a *formal* mechanism to review sales volumes and, if projections were wrong, to increase retail capacity.

We would also reiterate the need for SWR to make passengers aware that the existing sales equipment is being retained and the value of introducing queuing time metrics at TVMs.

## Conclusion

We are satisfied that the revised proposal should not create any additional risks for passengers (subject to queuing targets being implemented as above). **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 mean 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.

*“As an IBS sufferer I need and rely upon access to station toilets at the start and end of my journeys. If ticket office buildings are locked this will be devastating for me, and negatively affect my health and wellbeing.”*

*“I would be interested in the proposals to manage toilet opening hours where these are currently only unlocked during ticket office opening hours – is it proposed also to reduce toilet opening hours to match staffing hours and if so this will mean no toilet facilities at many Category 3 stations on many Mondays, Fridays and Saturdays where it is proposed the stations should now be unstaffed.”*

Your proposals (as revised) stated:

- You are reverting to the original ticket office staffing hours at all SWR stations in Transport Focus’s area.

We acknowledge that reverting to the original ticket office staffing hours will mean that facilities at the station will be open/available for the same times as now.

## 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 areas 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.

*“I do not trust SWR or the other rail providers not to eventually remove staff from the station altogether. Although they say they will keep staff on-site for now there is nothing to stop them getting rid of them in future. This means that elderly and disabled people would be excluded from the rail network, which is discriminatory to say the least.”*

Your letter of 27 September stated:

- That you would expect any proposed regulation of future staffing requirements to be debated nationally with the relevant industry body.
- That the Assisted Travel Policy, which is regulated and enforced by the Office of Rail and Road requires stakeholder involvement to make changes to provisions at stations. The Assisted Travel Policy will continue to be in place further to this consultation process.

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

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

## **Conclusion**

**Objection 5:** An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

ii) *Timing of mitigations*

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

Your letter of 26 September referred to two stages of mitigation, 'day 1' mitigations and longer-term mitigations. You said that your 'day 1' mitigations will maintain staffing hours and enable customers to buy the full range of tickets at our stations or online. These would act as a full mitigant to concerns raised and therefore it is not necessary to wait until a longer term solution is in place before the ticket office closes.

The main mitigation in your proposal is the decision to retain the existing station retail equipment in order to provide access to all products/services currently available. However, this is only being provided on a temporary basis. We believe that this safety net must be retained, especially for those who are non-digital and/or cash based. Any future change should be conditional on such services being maintained, and on consultation.

Other mitigations have also been proposed around Welcome Points and crime and vulnerability surveys. We have already set out in the sections above the importance of these being addressed prior to any changes at ticket offices – see objections 3 and 4 and recommendation 3.

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

## **Conclusion**

**Recommendation 1 applies again:** SWR refer to temporary mitigations (for the unbanked and digitally excluded) remaining in place until 'suitable alternative mitigation' is found. We believe it is a basic principle that access is maintained for those who are non-digital and/or cash based. Any move from the 'temporary mitigation' must be conditional on this and be subject to consultation.

### *iii) Monitoring and review*

We do not think there has been enough focus in plans on reviewing and monitoring changes should they go ahead. There needs to be a robust review mechanism based on research with passengers and a common and publicly available set of specific core metrics designed to monitor the impact.

As stated earlier, we think this must include queuing time metrics at Ticket Vending Machines. A robust queuing time regime (with enforcement) will help

provide reassurance and safeguards should industry expectations not be correct. This regime must be in place before any changes took place.

### **Conclusion**

**Objection 6:** There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.



## 7. Assessment for each station

**Objection 1:** Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

**Objection 2:** Additional specialist retail resource should be provided at Bournemouth, Guildford, Havant, Salisbury, Southampton Central and Winchester.

**Objection 3:** We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

**Objection 4:** We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

**Objection 5:** An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

**Objection 6:** There must be a robust monitoring and review mechanism in place to review any changes. This must include queuing time metrics.

<b>Station</b>	<b>Decision</b>	<b>Grounds for objection</b>
Aldershot	Objection	1, 3, 4, 5, 6
Alton	Objection	1, 3, 4, 5, 6
Andover	Objection	1, 3, 4, 5, 6
Ascot	Objection	1, 3, 4, 5, 6
Ash	Objection	1, 3, 4, 5, 6
Ash Vale	Objection	1, 3, 4, 5, 6
Axminster	Objection	1, 3, 4, 5, 6
Bagshot	Objection	1, 3, 4, 5, 6
Basingstoke	Objection	1, 3, 4, 5, 6
Bedhampton	Objection	1, 3, 4, 5, 6
Bentley	Objection	1, 3, 4, 5, 6
Bournemouth	Objection	1, 2, 3, 4, 5, 6
Bracknell	Objection	1, 3, 4, 5, 6
Branksome	Objection	1, 3, 4, 5, 6
Brockenhurst	Objection	1, 3, 4, 5, 6
Brookwood	Objection	1, 3, 4, 5, 6
Camberley	Objection	1, 3, 4, 5, 6
Chandlers Ford	Objection	1, 3, 4, 5, 6
Christchurch	Objection	1, 3, 4, 5, 6
Cosham	Objection	1, 3, 4, 5, 6

Crewkerne	Objection	1, 3, 4, 5, 6
Dorchester South	Objection	1, 3, 4, 5, 6
Earley	Objection	1, 3, 4, 5, 6
Eastleigh	Objection	1, 3, 4, 5, 6
Fareham	Objection	1, 3, 4, 5, 6
Farnborough Main	Objection	1, 3, 4, 5, 6
Farncombe	Objection	1, 3, 4, 5, 6
Farnham	Objection	1, 3, 4, 5, 6
Feniton	Objection	1, 3, 4, 5, 6
Fleet	Objection	1, 3, 4, 5, 6
Fratton	Objection	1, 3, 4, 5, 6
Frimley	Objection	1, 3, 4, 5, 6
Gillingham Dorset	Objection	1, 3, 4, 5, 6
Godalming	Objection	1, 3, 4, 5, 6
Guildford	Objection	1, 2, 3, 4, 5, 6
Hamworthy	Objection	1, 3, 4, 5, 6
Haslemere	Objection	1, 3, 4, 5, 6
Havant	Objection	1, 2, 3, 4, 5, 6
Hedge End	Objection	1, 3, 4, 5, 6
Hinton Admiral	Objection	1, 3, 4, 5, 6
Honiton	Objection	1, 3, 4, 5, 6
Hook	Objection	1, 3, 4, 5, 6
Liphook	Objection	1, 3, 4, 5, 6
Liss	Objection	1, 3, 4, 5, 6
Lymington Town	Objection	1, 3, 4, 5, 6
Martins Heron	Objection	1, 3, 4, 5, 6
Micheldever	Objection	1, 3, 4, 5, 6
Milford Surrey	Objection	1, 3, 4, 5, 6
Netley	Objection	1, 3, 4, 5, 6
New Milton	Objection	1, 3, 4, 5, 6
Overton	Objection	1, 3, 4, 5, 6
Parkstone	Objection	1, 3, 4, 5, 6
Petersfield	Objection	1, 3, 4, 5, 6
Pokesdown	Objection	1, 3, 4, 5, 6
Poole	Objection	1, 3, 4, 5, 6
Portchester	Objection	1, 3, 4, 5, 6
Portsmouth & Southsea	Objection	1, 3, 4, 5, 6
Portsmouth Harbour	Objection	1, 3, 4, 5, 6
Romsey	Objection	1, 3, 4, 5, 6
Rowlands Castle	Objection	1, 3, 4, 5, 6
Ryde Esplanade	Objection	1, 3, 4, 5, 6
Salisbury	Objection	1, 2, 3, 4, 5, 6
Shanklin	Objection	1, 3, 4, 5, 6

Sherborne	Objection	1, 3, 4, 5, 6
Southampton Airport PWY	Objection	1, 3, 4, 5, 6
Southampton Central	Objection	1, 2, 3, 4, 5, 6
St Denys	Objection	1, 3, 4, 5, 6
Sunningdale	Objection	1, 3, 4, 5, 6
Swanwick	Objection	1, 3, 4, 5, 6
Sway	Objection	1, 3, 4, 5, 6
Swaythling	Objection	1, 3, 4, 5, 6
Templecombe	Objection	1, 3, 4, 5, 6
Tisbury	Objection	1, 3, 4, 5, 6
Totton	Objection	1, 3, 4, 5, 6
Wareham	Objection	1, 3, 4, 5, 6
Weymouth	Objection	1, 3, 4, 5, 6
Whitchurch Hants	Objection	1, 3, 4, 5, 6
Winchester	Objection	1, 2, 3, 4, 5, 6
Winchfield	Objection	1, 3, 4, 5, 6
Winnersh	Objection	1, 3, 4, 5, 6
Winnersh Triangle	Objection	1, 3, 4, 5, 6
Witley	Objection	1, 3, 4, 5, 6
Wokingham	Objection	1, 3, 4, 5, 6
Wool	Objection	1, 3, 4, 5, 6
Woolston	Objection	1, 3, 4, 5, 6
Yeovil Junction	Objection	1, 3, 4, 5, 6

**Transport Focus  
31 October 2023**

**Annex**

1. Total objections received for South Western Railway
2. Transport Focus's letter of 6 September
3. SWR's response to that letter

## Annex 1: Total objections received for South Western Railway

Station specific objections:

Aldershot	61
Alton	477
Andover	214
Ascot	68
Ash	38
Ash Vale	17
Axminster	291
Bagshot	3
Basingstoke	230
Bedhampton	7
Bentley	8
Bournemouth	355
Bracknell	127
Branksome	22
Brockenhurst	119
Brookwood	44
Camberley	23
Chandlers Ford	28
Christchurch	90
Cosham	68
Crewkerne	144
Dorchester South	319
Earley	105
Eastleigh	83
Fareham	190
Farnborough Main	92
Farncombe	77
Farnham	179
Feniton	19
Fleet	136
Fratton	199
Frimley	2
Gillingham Dorset	109
Godalming	59
Guildford	229
Hamworthy	17
Haslemere	145
Havant	247
Hedge End	24

Hilsea	3
Hinton Admiral	41
Honiton	211
Hook	36
Liphook	63
Liss	62
Lymington Town	101
Martins Heron	80
Micheldever	3
Milford Surrey	13
Netley	11
New Milton	265
Overton	2
Parkstone	14
Petersfield	292
Pokesdown	52
Poole	254
Portchester	11
Portsmouth & Southsea	89
Portsmouth Harbour	84
Rowlands Castle	10
Ryde Esplanade	660
Salisbury	317
Shanklin	164
Sherborne	428
Southampton Airport Parkway	70
Southampton Central	217
St Denys	6
Sunningdale	222
Swanwick	36
Sway	15
Swaythling	3
Templecombe	54
Tisbury	93
Totton	33
Wareham	110
Weymouth	231
Whitchurch Hants	24
Winchester	300
Winchfield	101
Winnersh	53
Winnersh Triangle	18
Witley	9

Wokingham	533
Wool	26
Woolston	26
Yeovil Junction	106
<b>Total</b>	<b>10,217</b>

In addition to the 10,217 station specific objections listed above Transport Focus also received 31,758 responses objecting to South Western Railway's proposals in general.

Total South Western Railway objections: 41,975

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 South Western Railway's proposals:

Andover	417
Bournemouth	183
Branksome	59
Brockenhurst	178
Christchurch	286
Cosham	269
Dorchester South	62
Havant	118
Liphook	164
Lymington Town	760
New Milton	511
Pokesdown	62
Portsmouth Harbour	368
Sherborne	71

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.