

By email

Louise Ebbs  
Strategy Director  
TransPennine Express  
7th Floor Bridgewater House  
60 Whitworth Street  
Manchester  
M1 6LT

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Dear Louise

### **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*  
It appears proposals may be 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 so far chosen not to move to digital means of purchasing tickets. 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 channels if ticket offices are closed?*
- *Do you have any existing programmes designed to help people migrate to digital channels and if so, how effective have these been?*
- *Have you made any assessment of who will not / cannot move to digital channels and the effect on them of closing the ticket office?*
- *Do you have any forecast of the impact on revenue – i.e. on how many people will no longer travel as a result or will now travel without paying?*

Without evidence to the contrary, we must assume that many people will continue to want advice and support at the station and not readily migrate to digital channels. We note that plans include the provision of additional TVMs at some stations. However, there are still concerns at the ability to sell the expected number of tickets displaced from the ticket office, especially at peak hours. From the information provided it is clear there are still significant levels of sales at some ticket offices.

We do not have sufficient information about existing TVM usage (both sales and Ticket on Departure collections) to determine whether there is sufficient capacity to absorb the sales displaced from the ticket office. We are also mindful that demand is not evenly spread throughout the week, day or hour and that passengers tend to turn up in clusters, shortly before their departure. If TVMs cannot cope with the additional demand there is a risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket.

*Questions:*

- *Has any assessment of the TVM capacity at each station been carried out? This is both in terms of overall capacity and 'remaining' capacity – i.e. factoring in existing sales and Ticket on Departure collection per hour from the TVM?*
- *What reassurance or evidence can you give that there will be sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours?*
- *What assessment have you made of the impact of seasonal peaks, especially at tourist destinations such as Scarborough?*
- *Has any assessment of the location of TVMs been carried out – are they all available at all times trains are running and located in the right place on the station to best meet this demand?*

- *What mitigations do you intend to put in place to help staff 'queue bust' at busy times – for example, will staff have access to handheld ticketing devices and be tasked with selling 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, which currently applies to ticket offices. Will similar obligations be put onto other channels?*
- *Usability, functionality and accessibility of Ticket Vending Machines (TVMs)*  
TVMs are not capable of offering the same range of products and services as ticket offices. From the information provided it appears that the following products/ services are not currently available from TVMs:
    - Advance tickets
    - Seat reservations
    - Season tickets (longer than weekly)
    - Group Save
    - Rovers and Rangers
    - Car park tickets
    - Sleeper bookings
    - Rail and Sail
    - TfGM Wayfarer
    - WY Daysaver
    - Esk Valley Railcard
    - TfGM County Card.

It is not clear if any of the following products/services can be provided by a TVM:

- Buying tickets in advance rather than on the day of travel
- Tickets for travel that do not involve the 'host' station (important for people wishing to use split-ticketing arrangements)
- National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)
- Boundary Zone add-ons
- Plus Bus tickets
- Off-peak purchases before the off-peak begins (i.e. before 09.30)
- Scholar tickets
- CIV tickets for connections with Eurostar international services
- Ferry connections
- Cycle reservations
- Railcard Sales (National and regional)
- Refunds
- Staff travel discount
- Changing a booking/tickets
- Use of rail vouchers

- Use of rail warrants
- Photocards for season tickets.

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

*Questions:*

- *Are there any other products, not mentioned in the list above, that passengers will no longer be able to easily purchase from the station if the ticket office is closed?*
- *How will passengers access any products and services no longer easily available from the station in future?*
- *We understand that TPE plans to upgrade TVM functionality, what will this upgrade cover and when would it be complete?*
- *Can passengers always purchase a ticket from a TVM at the station for a train, even if a train (irrespective of the operator) is shown as 'sold out' and not available to purchase online? If not, how will passengers continue to be able to 'walk-up' and travel?*
- *We understand that TPE plans to retain the ticket office machine so that staff – where they are still present – can use this to sell 'unusual products'. How will this work in practice? How will passengers know this option is available? What range of products will be offered this way and why? Will this include retailing Railcards? How long can you guarantee that this facility will remain available to passengers?*
- *Has consideration been given to issuing staff with handheld machines to allow them to more easily sell the full range of tickets including those not available from the TVM?*
- *How can passengers have confidence that this proposed change is not a precursor to withdrawing some of the products that may no longer be easily available from the station?*

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)?*

- *Will TVMs be upgraded to offer remote access/video help facilities so passengers can access assistance when staff are not present?*
- *Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability? This includes whether they are under cover, whether passengers queuing are protected from the weather and whether they can be read in direct sunlight.*
- *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?*
  - *Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?*
- *Availability of staff to provide retail advice and help*  
TPE is proposing to close 14 ticket offices permanently and to reduce ticket office opening times at Manchester Airport and Huddersfield to the equivalent of one shift per day, and then, subject to a separate future consultation, close them permanently. The current proposals are for a reduction in current staffing hours at 9 stations from the equivalent of two shifts a day to one. The proposals mean at a significant number of stations a substantial reduction in the overall number of hours that there are staff present at a station and/or a reduction in the number of staff at the station.

*For example:*

- Stalybridge station is currently staffed from 05:45 – 23:15 Monday to Saturday and 06:35 – 23:35 on Sunday. It is proposed it will be staffed Monday to Friday 06:00 – 13:00, Saturday and Sunday 09:00 – 16:00. This is a reduction in time with a staff presence at the station from 122 hours to 49 hours per week.
- Scunthorpe station is currently staffed from 05:15 – 20:15 Monday to Saturday and 08:30 – 20:30 on Sunday. It is proposed it will be staffed 07:00 – 14:00 Monday to Saturday and 09:00 – 16:00 on Sunday. In addition to the reduction in the number of staffed hours it is proposed there will be fewer staff available at the station at some times of the day.
- Hull station is currently staffed 24 hours a day, 7 days a week. It is proposed that these hours will be maintained, but with fewer staff overall and remaining staff redeployed to multi-skilled roles and the ticket office closed.

- Manchester Airport is currently staffed 24 hours a day, 7 days a week. It is proposed these hours will be maintained, but with fewer staff overall and the ticket office retained (for now) though open for substantially reduced hours.

We know from our research that many passengers find the fares system complex and confusing and that some people find it difficult to use TVMs. Where staff are removed altogether, where numbers are substantially reduced, or where staff will now have multiple duties, it will make it harder for passengers to receive specialist advice or support from staff to make a ticket purchase.

Even where staff will still be present at the station there are questions whether 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 TVM, but also to understand what they should purchase.

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 would – at least for now - retain the ticket office? What was the reason for not doing so at other stations, for example at Hull?*
- *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 / assessments 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 assessment have you made of the impact of the proposed changes at Manchester Airport, taking into account the distinctive needs of airport passengers, including tourists and foreign visitors?*
- *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*

From the Equalities Impact Assessments published online it is clear 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:

- Middlesbrough 44 per cent
- Thornaby 42 per cent
- Grimsby Town 39 per cent.

We note that it is not proposed that a cash TVM will be available at any of the above stations. Cash TVMs are only proposed for Scarborough, Manchester Airport, Hull, Huddersfield and Dewsbury.

Where there is no alternative cash retail option at the station, it can be expected many of these passengers currently using the ticket office would in future have to purchase onboard the train or at their destination. This risks a worsening of the customer experience for these passengers, potentially lost industry revenue and potentially worsening punctuality if the guard is required to sell more tickets rather than standing by to open doors.

*Questions:*

- *Have you considered providing cash TVMs at more stations?*
- *Where cash TVMs are available, have you made any specific assessment of the ability of these TVMs to cope with the increase in cash, especially at stations where there is a higher than average use of cash to purchase tickets?*
- *If a person cannot pay by cash what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?*
- *How will passengers paying with cash be able to access the full range of products listed above (in relation to TVMs on page 3)?*
- *Disabled passengers may be more likely to use cash when purchasing tickets. Are all cash TVMs at accessible (step-free) locations in the station?*

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

It is clear that where ticket office staff are the only staff presence at a station the proposals for many stations will result in significant reductions in the number hours that the station has a staff presence. 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.

We note that it is proposed that station staffing hours will be maintained at Selby and Thirsk stations, which have barrow crossings and do not have step-free access to platforms. However,

at stations where the hours that staff are present has been reduced it appears some disabled passengers' ability to 'turn up and go' or to travel from the station having booked assistance will still be impacted. While staff onboard the train may be able to assist passengers on and off the train, they will not be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

*Questions:*

- *When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?*
- *If assistance can only be provided by staff onboard trains how will passengers be assisted to move around the station to the platform / to purchase the correct ticket / get advice / journey plan? How will passengers alert the guard if they haven't pre-booked assistance?*
- *If 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? How easy is it to source accessible taxis and how reliable are they?*
- *What monitoring regimes are in place to measure time taken and reliability?*
- *How will people summon help if staff are not available at the station?*
- *Do all stations have tactile paving fitted along the entire length of each platform face? If not, which stations do not have this? The need for this is increased if the station is to have no or fewer staff in future. If not, which stations do not have this and what additional mitigations can be taken to ensure the safety of visually impaired passengers?*

Where a staff presence has been maintained, in many instances the number of staff available has been reduced. And the staff member will have multiple functions to perform rather than just retail.

*Questions:*

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

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 or immediately visible?*
- *Will induction loop facilities be provided elsewhere on the station/concourse?*
- *What mechanisms 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?*
- *What assurance can you provide that staffing levels will be sufficient to ensure that – alongside their retail and passenger assistance duties – staff will be readily available to offer help to passengers requiring information and advice?*
- *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?*

If staff have been removed or 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 available at every station and are they in an accessible location? Are there any plans to position help points in concourse areas to avoid having to walk along platforms or over bridges to summon help?*
- *What are the existing processes and SLAs for monitoring help points and the response time to repair faults? What future commitments can you give?*

- *What are the expected standards for answering help points (I.e. within how many seconds)? What is the current performance?*
- *How will you monitor and report time taken to answer help point calls / proportion not answered?*
- *What are the standards for monitoring how quickly you respond to passengers using the emergency button?*
- *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 and often 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. They must be confident they will not be penalised if they do so. This must include people who are not able to use a TVM because of a disability.

Signage at a station must not send contradictory messages. For example, Penalty Fare notices that require you to have a ticket before boarding a train need to be consistent with other notices that may instruct people to buy certain tickets on board.

*Questions:*

- *What changes to ticketless travel rules will be made / where will these be written down to give people who can't buy a ticket some assurances that they won't be penalised?*
- *What processes will be in place so that passengers do not have to publicly declare/evidence their disability to buy on the train without penalty?*
- *How will you review signage to avoid sending inconsistent messages about revenue protection?*

**Issues relating to whether passengers can continue to use facilities at a station.**

From the information provided it appears that access to station facilities including all lifts, waiting rooms and toilets will be maintained at all stations, including where it is proposed staffing hours will be reduced.

*Questions:*

- *What are the proposed mitigations to ensure all passenger facilities (including lifts) are available even when staff are no longer present? How robust will they be? Do they rely on future investment and if so, is funding secured?*

- *How will it be ensured that station facilities are not subject to misuse or vandalism and will be maintained in good condition?*
- *We understand that alarms in accessible toilets are often set up so they can alert staff in ticket offices. Is this the case and, if so, 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. Proposals to remove the staff presence in the evenings, as is the case for a number of stations, seems particularly likely to result in increased concern about personal safety.

#### **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?*
- *Some stations, for example Stalybridge and Dewsbury, have pubs on the station premises. How have you assessed their impact on passenger perceptions of personal security where staff will no longer be present?*

### **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 will be delivered and maintained in the future?*
- *Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?*
- *How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?*
- *How will compliance with any agreed new hours be monitored and reported?*
- *What arrangements have been made to provide staff cover for things like sickness and holiday?*

- *Timing of mitigations*

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

*Questions:*

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

- *Liaison with other operators*

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

*Questions:*

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

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

Mike Hewitson  
Head of Policy

Copied to:  
Adam Fairclough