

c2c'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 c2c'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, or through apps or via 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

c2c published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 29,968 representations objecting to c2c's proposal and 33 representations supporting c2c's proposal.

Transport Focus used information provided by c2c and the issues raised by passengers to analyse proposals. We based our assessment on the impact of the proposals on quality of service for passengers, however, we acknowledge that cost effectiveness is also part of the criteria. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

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

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

Transport Focus acknowledges that c2c has made significant improvements to its original proposal, especially in reinstating staff at some stations. However, having analysed these revised proposals we still have concerns. Some of these are specific to c2c stations and some 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** 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 c2c 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.

- Access to rail products

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

- The range of tickets and services offered at the following stations, including for those reliant on cash: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.
- Whether the remaining retail staffing hours at the following stations would meet demand: Basildon, Benfleet, Chalkwell, Laindon, Pitsea and Tilbury Town.
- Whether the hours proposed for retail staff (Floorwalkers) at Basildon and Southend Central is sufficient.

- Most stations will not retain ticket office equipment and so have no obvious mechanism to 'queue-bust' should there be long queues at Ticket Vending Machines.
- 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 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 – for example, how many people will migrate to digital channels or contactless payment, how many will move to TVMs, can TVMs absorb future demand? We believe this needs to be in place at all stations but we have specific concerns at the following stations: Basildon, Benfleet, Southend Central, Chalkwell, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town and Westcliff.

A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct.

It is clear from the consultation response that members of the public and passengers had serious misgivings with the original proposal. Transport Focus has analysed the proposal and any mitigations designed to address passengers' concerns. The following detailed analysis identifies our remaining concerns and why we have objected to the proposal to close ticket offices.

3. The process

The procedure for making a major change to ticket office opening hours is set out in clause 6-18 of the [Ticketing and Settlement Agreement](#) (TSA). This requires a train company to post details of the change at affected stations and to invite people to send representations to Transport Focus (or to London TravelWatch if the station is based in its operating area). Transport Focus analyses these responses and uses them to help inform its decision on whether to object to the proposals for stations in its operating area.

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the TSA. 13 train companies

announced their plans simultaneously, of which 12 had stations in Transport Focus's operating area, the exception being Southeastern.

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

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

4. Responses to the consultation

During the consultation period we received a total of 585,178 responses by email, webform, freepost and phone. Some were specific to individual stations, some were specific to train companies as a whole and some were at a national level in other words, objecting to the proposals by all train companies.

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 29,968 objections to c2c's proposals.

The top three issues in these 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 33 representations supporting c2c's proposal to close ticket offices out of a total of 721 nationally.

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

5. Criteria for assessment

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

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

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

Transport Focus may object to a proposal on the grounds that the change does not meet one or both of the criteria above. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State for a decision. The Department for Transport has previously published guidance setting out the approach the Secretary of State (SofS) would take in these circumstances. This [guidance](#) states that the SofS is “content for Transport Focus and the Operator to continue discussing the proposal, including amending it, if that would enable an agreement to be reached. If the matter is referred to the SofS, the SofS will decide whether the objections are valid or not; i.e. the proposed change fails to meet the criteria, or meets the criteria. Alternatively, the procedure permits an arbitrator to be appointed to determine if the criteria are met.”

At the same time the consultation was launched, to provide transparency on our role in the process, Transport Focus published its own [criteria](#) (which contain many of the same themes set out in the Secretary of State's guidance document). They covered:

- *Passengers can easily buy the right ticket for the journey they want to make.*

This included the product range available at the station, what support is available to advise/help with a purchase and access for people who need to use cash or do not have a smartphone.

- *Passengers requiring assistance to travel receive that assistance in a timely and reliable manner.*

This included arrangements for providing booked assistance (using the Passenger Assist process), assistance provided on a 'turn-up-and-go' basis, the support available when buying a ticket and the ease of requesting assistance.

- *Passengers can get the information they require to plan and make a journey, including during periods of disruption.*

This included the information channels available at the station and the support available to help passengers who need assistance.

- *Passengers feel safe at a station.*

This included perceptions of personal security and how train companies will provide reassurance for passengers wanting to travel.

- *Passengers are not penalised if they cannot buy the ticket they require from the station.*

This included arrangements for issuing Penalty Fares or prosecutions for fare evasion.

- *Passengers can continue to use facilities at a station.*

This included access to facilities such as waiting rooms, toilets, lifts and car parking.

Transport Focus made clear it would focus its assessment on the impact of the proposals on quality of service for passengers, however, we acknowledge that cost effectiveness is also part of the 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 c2c 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. c2c replied on 26 September answering these questions. These letters are attached as Annex 2 and 3.

c2c's original proposal was to:

- Close most ticket offices and move staff to other station areas, where they would be better placed to help customers buy tickets and provide travel advice and information.
- Existing c2c ticket office staff will be trained and redeployed as 'Floorwalkers'. They would provide support and assistance, including specialist retail advice. At several stations the hours of Floorwalker staff would be less than that provided at the ticket office.
- West Horndon station would be de-staffed and East Tilbury would lose specialist retail staff.
- Three stations would retain ticket office facilities but with a change in opening hours: Benfleet, Basildon and Southend Central.

Following further discussion with Transport Focus your letter of 26 September made some significant changes to your proposals:

- No current staffed station will become unstaffed.
- An additional five TVMs: Basildon, Benfleet, Pitsea, Southend Central and Leigh on Sea.
- The creation of designated Welcome Points. These would be an initial focal point on entering a station that provides support and/or advice. It would be a consistent and common location at c2c stations to offer reassurance and would be developed in collaboration with local, disability passenger user groups to ensure that it is fit for purpose and effective.
- Accessible fares. You would continue to work closely with industry partners to confirm the range of ticket products that may be impacted by the proposal. This could include improvements to TVMs, the digitisation of additional ticket types and changes to rail industry policy and processes.

We acknowledge that you have made significant changes to your original proposal in response to passenger feedback from the consultation, especially in reinstating staff in some 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:

"I find it so helpful to have the assistance and advice of a human on the spot, whereas I find getting information online labyrinthine and frustrating."

“The implications of this action will seriously affect many people in many different walks of life – from the physically disabled to persons suffering from anxiety, which can heighten their plight for travelling if they are unable to be reassured by trained personnel.”

“My wife has dyslexia and finds a world of machines most unhelpful. It’s much better to have someone to speak with, ask about train times and fares and pay and collect a ticket for travel.”

“Personally I am extremely concerned that there will not be a person in a designated place ready to help with enquiries, difficulties and the process of obtaining a ticket to travel.”

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:

“When trying to book tickets for journeys online I have found the choices, variations in prices bewildering and website options confusing.”

“I chose to try and buy said tickets online, using the c2c website. I made my entries (traveling Saturday returning Sunday) to be told by the website that those options were not available!! So as a result, I still had to go to the train station and purchase the tickets from the nice man behind the counter. The machine would not accept my options either.”

“Passengers must be able to trust that the ticket system will provide them with understandable options and the best financial solution for their journey, especially where trips extend across multiple operators.”

Useability of Ticket Vending Machines

c2c's original proposals placed a much greater reliance on sales from Ticket Vending Machines (TVMs) than at present.

TVMs clearly have an important role to play in retailing tickets, and we know from our research that many regular users find them quick and easy to use once you know how. However, it is equally clear from our research and the comments received that some passengers still have concerns about using them. TVMs are not physically accessible to all passengers and some people with cognitive disabilities can have difficulties in using them. Others do not find them user-friendly, requiring a degree of prior knowledge of the fares structure which some passengers do not possess. In addition, not all TVMs can offer the same range of products and services as ticket offices.

Even where staff will still be present at the station it will be important that they have sufficient expertise to help passengers navigate the complex fares system. In contrast to many other self-service retail situations, for example a self-checkout at a supermarket, many passengers will need support not just to use the TVM), 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:

“There are many school children who use the station and it is not possible, unless maybe you have a degree in computing, to obtain a child ticket for term time use only.”

“Ticket machines are unreliable and have a habit of breaking down. Also they are not easy for partially sighted passengers to use.”

“The ticket machines are notoriously complicated and time consuming to use and are incapable of making helpful suggestions as to which route and ticket type will best suit the needs of myself or any traveller!”

“You cannot ask a ticket machine the best time to travel, cheapest fares or stations more suited for disabilities.”

“The Ticket Machines are not user friendly or intuitive and when I’m stuck using them in the mornings I find I make other people late which adds stress to the transaction.”

“Many times, when I have visited Chalkwell Station, the ticket machines have been either not working properly or have both been completely out of order.”

“I am 69 and hard of hearing and will be devastated if the ticket office closes. I rely on information from staff behind the counter and find the machines very awkward to use, not to mention how small and difficult to see, the instructions are.”

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.

Concerns about queue lengths came through in the consultation:

“There is a queue out of the door on weekdays as it is, the waiting time will increase without the ticket office.” Leigh On Sea passenger

“At anytime, and regularly past 7am, the queue becomes extremely long, going down to the gangway to access the beach - which is many metres from the station entrance. This is regardless of machines working (or not), and desks currently available.” Chalkwell passenger

“When the ticket office at Thorpe Bay is closed it has been necessary to purchase a ticket from a ticket machine located outside the station. The queue has been so long that in spite of turning up early to catch the train, I inevitably miss the train I wish to catch.”

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.

Comments received during the consultation included:

“We pay using cash like loads of people do. There are not enough Ticket Vending Machines around, and when there are, they hardly ever work.”

“Please do not close your ticket offices. Not everyone pays by card, cash still exists.”

“Some tickets may not be available from machines for cash or card purchase. This could mean that passengers are forced to buy more expensive tickets; this is clearly unfair.”

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.

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, c2c's TVMs do not sell products such as Railcards, season tickets longer than monthly, Rangers and Rovers (other than your own Senior Rover) and national concessions for disabled people (for wheelchair and visually impaired passengers plus a companion). Nor do they 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.

This came through in the public consultation:

“I also have concerns over whether a machine will always offer the best value tickets.”

“At Benfleet recently the internet and the ticket machines told me that the cheapest tickets for two of us to Fenchurch Street were in excess of £20 each. This was such a ridiculous amount (it would have been far cheaper to drive up there and park) that I went to the ticket office and queried this amount. The

young lady asked a couple of questions and then said that we could have tickets at £10 each. These tickets were not available on the machines.”

“As someone who regularly travels across the National Rail network, I regularly use Ranger and Rover tickets. However, these are only able to be purchased at ticket offices and cannot be purchased at ticket machines. If ticket offices permanently close, then this means that I will not be able to buy these Ranger and Rover tickets, which may therefore put me off from using the National Rail network.”

“Ticket machines do not offer the full range of tickets. They do not allow split ticketing. They do not allow me to buy from the edge of my regional pass. They don't want to sell day tickets or weekly tickets. They don't have regional rail cards. No way to get or renew a Railcard. I need to add a photo or get my age verified, not available on the machine.”

c2c's proposals (as revised) stated:

- You will retain retail staff at East Tilbury and at West Horndon stations.
- 'Tap-and-Go' contactless payment would be in place across the c2c network by the end of 2023. You state: “this proposal won't proceed until it has been introduced”. You estimate that nearly half of all at-station transactions are eligible to switch to this mode.
- Barcode ticketing would also be launched across the c2c network by the end of 2023. You estimate that one-third of at-station sales are eligible to be purchased online to ITSO or barcode.
- You are investigating whether staff will have access to the TVM 'staff mode' option – allowing greater functionality.
- You do not have plans to provide staff with mobile ticketing machines, their role will be to guide our customers to other fulfilment methods.
- A full product range will be available at Benfleet, Basildon and Southend Central stations. Your intention at these 'Customer Information Centres' (CIC) will be to assist customers with a 'floorwalking' member of staff. Staff will not be based behind the window however will be able to go and assist customers that cannot purchase their ticket type by other methods.
- Where products are not available at TVMs passengers will be able to travel without a ticket and buy one at the next available opportunity, which will include buying from staff at Customer Information Centres
- All frontline staff will be trained to help passengers choose the best ticket, rather than just 'Floorwalkers'.
- Every c2c station offers at least one TVM which accepts cash payment. station.
- TVMs:
 - o c2c TVMs already offer: Advance Purchase, weekly and monthly seasons, boundary zone add-ons, buying tickets in advance rather

than on the day of travel, tickets for travel that do not involve the 'host' station, c2's Senior Rover ticket, PlusBus, and Group Save.

- Five additional TVMs would be provided.
- You are planning improvements to TVM functionality (covering national concessions for disabled people, changing a booking or tickets, rovers/rangers) but this is not planned to be completed until mid-late 2024 and is dependent on funding.
- There are also industry wide proposals to:
 - Remove the requirement for a Photocard when purchasing a Season Ticket. Operators will accept any reasonable alternative form of ID, such as a driving licence, passport, Railcard, student ID, alternative entitlement card (senior citizens pass) or national ID card. For customers who do not have access to a suitable alternative form of ID, a Photocard will still be available from remaining Ticket Offices and via post from a contact centre or third party retailer.
 - Offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead.
- National concessions for disabled people, rail warrants, and rail vouchers could also be purchased on the train or at destination.

We acknowledge the reinstatement of retail staffing at East Tilbury and West Horndon, and that full ticketing functionality remains at Benfleet, Basildon and Southend Central. We also acknowledge the statement that contactless payment would be introduced across the entire c2c network before ticket office proposals would begin.

However, we remain concerned with the following:

- i) Some core products and services will no longer be available at the station*
- You have decided to retain the ticket office machines at the three CIC stations, Basildon, Benfleet and Southend Central. These stations will be capable of selling the full range of tickets that are available from c2c ticket offices today. However, other stations will not retain the ticket office machine and staff will not be issued with mobile/hand-held devices that can provide full functionality. This means some products and services will no longer be available at non-CIC stations.

We note that some of these products could be made available on TVMs in future but that this could not take place until the middle of next year and is still subject to funding – they are not guaranteed. There is also the question of how they would be provided until any upgrade – we do not think online-only or having to travel to a CIC station to be a sufficient 'day one' mitigation.

We note your statement that passengers requiring a ticket that is not available at the station will be able to travel without a ticket and buy one at the next available opportunity, which will include buying from staff at Customer Information Centres. This would help to ensure access but it leads to a contradiction with Penalty Fare signage/rules requiring people to have a valid ticket before boarding. The National Rail Conditions of Travel set out the circumstances in which a person can board without a valid ticket: where there are no facilities to buy, or they are not working; where a TVM will not accept your preferred method of payment (card or cash); or where you have a disability and facilities at the station are not accessible to you. They do not provide an explicit assurance that you can board a train if you cannot get the type of ticket you want. If 'board and pay later' is to become standard for some products, then there will need to be explicit permission that people can do this without penalty. This will require very clear signage and notification at the station – both in terms of when you can board without a valid ticket and when you can't; and what products/services you can access on board and what you will need to purchase at the station. It should also lead to a change in the National Rail Conditions of Travel. Without such assurances there is a risk that people become liable for a penalty fare or that they will buy the wrong (potentially more expensive) ticket rather than take the risk of boarding the train without a ticket.

We are particularly concerned that passengers will not be able to buy Railcards at stations (other than at the three Customer Information Centres outlined above). Railcards are a key way in which rail travel is made more affordable. While the majority may be fulfilled online, sales figures show there is still demand for them at stations – not everyone is willing or able to buy them online. If rail is to remain fully inclusive, then these need to be available, including for cash. We believe it is unacceptable to only offer online options for these products or to require people to travel to the nearest 'hub' station. It will also not be possible to obtain cycle reservations or change a booking at these non-CIC stations.

We also remain concerned about passengers who need to use cash. We acknowledge that there will be a TVM that accepts cash at each station. However, and as mentioned, outside the CIC stations it will not be possible to buy a Railcard for cash; nor is it clear how cash refunds will be made at stations in future. We note that this is something being considered at a national level – and that you may be able to address this via a staff mode option on TVMs – but at present there are no firm commitments. We are conscious that The National Rail Conditions of Travel state that if you bought your ticket with cash you are entitled to a refund in cash and as it stands this will not be possible at stations other than Benfleet, Basildon and Southend Central.

It is also not clear how passengers without bank accounts would receive compensation if their train is delayed. We acknowledge that these issues exist now at stations that currently have no staff. However, the TSA terms of reference refer to 'improvements in quality of service' and it is hard to see how removing cash-services from more stations could be seen as an improvement for people reliant on cash.

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

Objection 1: We are not satisfied that passengers will retain easy access to key products at the following stations: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now at the following stations: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.

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

ii) Retail capacity at the station

We acknowledge that Pay-As-You-Go and barcode ticketing will absorb some of the sales that used to be via ticket offices. We also acknowledge that c2c is providing five additional TVMs.

However, we also note that some ticket offices currently record high levels of sales. While Floorwalkers may be able to help people use a TVM, in most instances, they do not retain the ability to actually issue a ticket. Therefore, removing ticket windows reduces the number of 'points of sale' resulting in a much higher demand on the remaining TVMs.

- At the three CIC stations:

Basildon and Benfleet have significant sales all week long while Southend Central has high levels of sales on a Saturday. We have concerns that TVMs will not be able to absorb this volume during periods of high-peak demand. We note that these stations will retain the ticket office equipment, but that staff will not be based behind the window. During peak hours we feel that there will be a need for the ticket office machine to be used as a queue-buster rather than being kept in reserve for products that can't be sold from TVMs. We accept that contactless will reduce the volume of demand on TVMs but until it is implemented we cannot be sure by how much – hence there is still a risk of long queues at TVMs at peak times.

- At the non-CIC stations:
We have similar concerns at the ability of TVMs to absorb peak-level sales at the following stations: Chalkwell, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town and Westcliff. These stations will not retain ticket office equipment and so have no obvious mechanism to 'queue-bust'. Again, we recognise the potential for contactless payment to make a significant difference to volumes.

It is clear that much depends on the projected uptake of contactless and barcode payments. Therefore, we think it important that this be introduced before there are any changes to ticket office staffing in order to get an accurate assessment of the remaining demand for at station sales.

We also 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. A robust metric and reporting regime (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 to introduce queue-busting measures (such as issuing staff with hand-held ticket devices so that they can sell tickets). There is also a strong argument for putting these results into the public domain (for example in Customer Reports).

A commitment to a queuing time metric would give assurance at those stations above where there are large volumes of sales to absorb onto TVMs, and uncertainty on our part about the impact of contactless payment on residual demand. It would ensure there is a formal, enforceable mechanism to review sales volumes and, if projections are wrong, to increase retail capacity.

Conclusion

Objection 3: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

iii) Retail staffing hours

We are mindful of the following statement made by the Rail Minister: “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.”

In subsequent correspondence you stated that c2c’s proposal “has a 1 per cent change in availability of trained retail staff across all c2c stations over a seven-day period – some stations will have less hours and some will have more.”

Nonetheless we note that there are some significant reductions at some stations between current ticket office hours and proposed Floorwalker hours. There will still be other staff at the station but there will be no specialist retail staff providing advice on tickets, and assistance in buying them, at those times. The ability of staff to help with the ticket purchasing process was one of the key themes to come through in the consultation. To help assess this we looked at ticket sales in those periods to get a sense of demand/need for specialist advice.

We believe that there are sufficient sales to justify a Floorwalker at the following stations and times:

- Basildon: retain Floorwalker staff from 0515-0600 Mon-Fri; and from 0615-0700 Sunday
- Benfleet: retain Floorwalker staff from 0600-0630 and 1930-2100 Saturday; and from 1900-2000 Sunday
- Chalkwell: retain Floorwalker staff from 0700-0800 and 1500-1600 Saturday
- Laindon: retain Floorwalker staff from 0515-0600 Mon-Fri; and from 0715-1030 Sunday
- Pitsea: retain Floorwalker staff from 0515-0600 Mon-Fri; and from 0700-0830 and 1630-1800 Saturday; and 0700-0830 Sunday.
- Tilbury Town: retain Floorwalker staff from 0615-0830 and 1530-1900 Saturday.

Not having specialist retail advice at these times could impact on passengers.

In addition, we note that retail staff numbers could be reduced at some stations. From information provided (on a confidential basis) we have concerns whether there would be enough Floorwalker resource (or specialist retail advice) to cope with passenger volumes and demand at Basildon (Mon-Fri) and Southend Central (Mon-Fri)

Conclusion

Objection 4: Additional Floorwalking staffing hours should be provided for the stations and times listed above.

Objection 5: Additional Floorwalking resource should be provided at Basildon and Southend Central (Monday-Friday).

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.

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:

"Due to my age and sight issues it's not an option for me to use the internet or machines unless I have help. My journeys are often complex and being able to discuss details prior to purchase/travelling is a requirement. Talking to an experienced person is much better than struggling through various websites."

"On a personal level, I suffer from severe anxiety, particularly around using public transport, I also have hearing loss which affects my confidence. I find having to type travel information into a machine and use my card, especially if there is a queue of people, totally stressful and overwhelming."

"What arrangements are being implemented for disabled discounts where a carer travels free."

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.

"My partner is disabled and uses a wheelchair. He depends on being able to find someone at a ticket office and he can't always get through ticket barriers"

independently. We know there will be someone he or I can speak to in a ticket office whereas he can't often go wandering around a station, especially one with stairs, to find someone for assistance.”

“Disabled people with mobility or energy impairments cannot travel through the station to try and find assistance, and blind and visually impaired passengers will struggle to identify a member of staff. Ticket offices are also the only designated point in the station with a hearing induction loop.”

Your proposals (as revised) stated:

- Reinstatement of staff at West Horndon and specialist retail staff at East Tilbury.
- The creation of designated Welcome Points. These would be an initial focal point on entering a station that provides support and/or advice. It would be a consistent and common location at c2c stations to offer reassurance and would be developed in collaboration with local, disability passenger user groups to ensure that it is fit for purpose and effective. The Welcome Point would be a clearly signed location within the station. During staffed hours this location would have a member of staff nearby to offer advice and support.
- That staff will be based on the station concourse under the proposals as opposed to behind the ticket office window as at present. This will mean they are best placed to assist customers.
- You will prioritise assistance for customers with disabilities – this will always be the first task staff are asked to deliver.
- Every station has a help point either on the platform or in the concourse area which customers are directed to use if they cannot locate a member of staff.

We acknowledge the reinstatement of staff at West Horndon. However, this is not for the same hours as now – there is a loss of 2 hours 15 minutes on Saturday – and there are no other staff at that time. This leads to a reduction in staff assistance for accessibility, as well as for information, personal security and retail advice.

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

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 the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of these Welcome Points.

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

Conclusion

Objection 6: Staffing hours for West Horndon should revert to the current staffing times.

Objection 7: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 8: 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 particularly value the information provided by staff at a station. Reducing the hours staff are available or making it harder to find them, would make it harder for passengers to access advice and information from staff.

“Ticket office staff are often my first point of contact at stations. They provide assistance, information, advice and not just tickets. For blind and partially sighted people this support is vital. Roaming staff are not an acceptable alternative – especially if you cannot see them!”

“Personally I am extremely concerned that there will not be a person in a designated place ready to help with enquiries, difficulties and the process of obtaining a ticket to travel.”

“I don't believe that in the long term the staff will be redeployed; I believe that over a period of time staffing levels will be reduced.”

Your proposals (as revised) stated:

- You will provide information traditionally displayed in the ticket office, including timetable leaflets, accessible travel policies, local travel information, local bus timetables at the Welcome Point.
- Your frontline teams have access to a mobile device so that they can provide information to passengers, they will continue to have access to station PC's and printers and are encouraged to print out itineraries for customers who require them.

We note that all stations will continue to have a staff presence at all the times ticket offices are currently open (with the exception of West Horndon as outlined above – which remains an issue of concern).

We note that information is not just limited to Floorwalkers, Gateline staff will also be expected to provide answers to general (non-retail) questions. We believe that this should ensure that there is someone available to provide basic information on journey planning and disruption information as now. However, there may be times, with more complicated journeys, when specialist retail advice is essential to help plan a journey. Therefore, we reiterate our concerns about Floorwalker hours set out above.

Conclusion

Objection 4 applies again: Additional Floorwalking staffing hours should be provided for the stations and times listed above.

Objection 6 applies again: Staffing hours for West Horndon should revert to the current staffing times.

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.

Comments received during the consultation included:

“Passenger safety will be adversely affected if there are fewer staff on site. This is particularly the case for women travelling alone. And there will be fewer staff around. Won't there!”

“Even more important is the passenger safety aspect. As a female passenger I want to feel safe at a station and know where exactly I can find a member of staff. This currently doesn't happen if you are looking for a member of staff on long platforms.”

“I am a woman who travels alone from Leigh on Sea on a regular basis. If the ticket office is closed there will be no staff in situ. This is unacceptable to me for safety and security reasons. I will be forced to travel by car.”

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 have reinstated staffing at West Horndon station.
- c2c has a CCTV monitoring suite staffed 24/7, across all days of c2c train services.
- 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 note that all stations will continue to have a staff presence at all the times ticket offices are currently open (with the exception of West Horndon as outlined above). We believe that this should ensure the same level of reassurance to passengers as now. Indeed, in some instances, having more a more visible staff presence (for example staff being on the concourse rather than in a ticket office) could improve perceptions of safety.

Conclusion

Objection 6 applies again: A reduction in staffing hours/presence at West Horndon station creates an additional risk for personal security at that station.

Recommendation 2: There should be no implementation of proposals until the crime and vulnerability audits mentioned above have been completed and any necessary actions have been implemented.

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

In our letter of 6 September we were concerned that relying on TVMs that are not fully accessible, or do not sell the full product range could mean more passengers are unable to buy the ticket they want before they board the train. This could result in people having to buy the 'wrong' ticket or risk being penalised for boarding without a valid ticket.

Comments received during the consultation included:

"There have been multiple occasions where ticket machines at the station have been out of order and, without a ticket office, I would not have been able to board a train unless I chose to jump the barriers or risk a fine on the train."

“I have been issued with a fine before due to a fault with a machine at an unstaffed station – this was distressing, I still have trauma when boarding a train now because help was not on hand for me to buy a ticket.”

Your proposals (as revised) stated:

- You are working across the industry to develop a policy and an effective approach to enabling passengers to travel without a ticket and not to have to go out of their way to buy a ticket.
- Subject to finalising the relevant agreements and assessments, the intention is to have these processes in place by mid-2024. Staff will be issued with relevant instructions to allow passengers to travel without a ticket in certain circumstances, including clarification of travel in Compulsory Ticket Areas (CTAs) to ensure passengers are not unfairly penalised.
- National Rail Conditions of Travel (NRCoT) and the associated Railways (Penalty Fare) Regulations already provides the conditions under which a passenger may travel without a ticket without incurring a penalty fare. Interim policy guidance and training will be issued to ensure that customers are able to travel under Section 6.1 NRCoT when necessary.
- In a limited number of cases, operators will offer a ‘Permit to Travel’ to another location to allow travel to another station to purchase their product. This would be limited to a small range of products (not for use on the day, complex products). Such products may include in-person purchase of a Railcard, annual seasons (if not mandated to digital), and Rover and Ranger tickets.
- For travel on the day or reasonably available tickets, such as weekly seasons, the customer should be handled under existing NRCoT conditions (Section 6.1)
- You will ensure that all notices and signage within stations are updated to reflect any changes in policies and processes in a consistent manner. This includes ‘wayfinding’ signage, and information about travelling without a ticket and the circumstances in which a penalty fare may be incurred.

We acknowledge that the National Rail Conditions of Travel explicitly state that you can board without a valid ticket if:

- “You have a disability and ticket purchasing arrangements at the station you are departing from are not accessible to you.” (clause 6.1.3.3)
- “A self-service ticket machine is not in working order, or will not accept your preferred method of payment (card or cash).” (clause 6.1.3.2)

However, as already covered above, the National Rail Conditions of Travel make no mention of allowing you to board in situations where you cannot get the ticket you want. They do not provide an explicit assurance that you can board a train if you cannot get the type of ticket you want. If this is to be permitted there will need to be

explicit permission that people can do this without penalty. Therefore, the current National Rail Conditions of Travel do not provide adequate safeguards in this area. This will require very clear signage and notification at the station – both in terms of when you can board without a valid ticket and when you can't; and what products/services you can access on board and what you will need to purchase at the station. It should also lead to a change in the National Rail Conditions of Travel. Without such assurances there is a risk that people become liable for a penalty fare or that they will buy the wrong (potentially more expensive) ticket rather than take the risk of boarding the train without a ticket.

Conclusion

Objection 9: We are not yet satisfied that adequate safeguards exist to prevent passengers being penalised if they cannot buy the ticket they require from the station. This applies to the following non-CIC stations as they will not retain the ability to sell all tickets: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.

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

In our letter of 6 September we expressed concern at instances where facilities such as waiting rooms, toilets (including accessible toilets), and lifts could/would be closed because there was no member of staff to open them. We were concerned that any changes to ticket retailing at stations should not result in a 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.

“Permanent ticket office closures seem likely to lead to the closure of toilets and waiting-rooms, given that these facilities are generally inaccessible during present-day hours of closure of ticket offices, sometimes even during office opening hours. Withdrawal of these facilities would cause serious hardship and could be harmful to passengers’ health.”

Your proposals (as revised) stated:

- c2c has amended the staffing hours so that no currently staffed station will become unstaffed. There will be no changes to the opening times of facilities as part of this plan.

We acknowledge this commitment to maintaining access to facilities. However, concerns remain at West Horndon as a reduction in staffing hours (see above) could have an impact on the availability of facilities at that station.

Conclusion

Objection 6 applies again: a reduction in staffing hours at West Horndon risks station facilities not being available for the same duration as they are now.

6g) Other issues

Transport Focus's published [criteria](#) stated that we would also consider other issues raised by members of the public during the consultation. Two key issues were:

i) *Future regulation*

The public consultation feedback highlighted a widespread concern that if ticket offices are closed and 'schedule 17' regulation no longer applies, there will be no ongoing requirement to consult on any future changes.

Many passengers fear that train companies will make further cuts to staff if existing regulations are removed and even that any mitigations promised, or commitments made, as part of the current consultation could quickly be lost.

"Once ticket offices have been closed there will be no legal requirement for rail companies to consult in future on the removal of station staff."

"No-one buys this suggestion that removing the ticket offices will give these employees more time on the platform as we all know very, very well that these jobs will simply disappear."

"To be in favour of the consultation I'd need to be sure staff are being deployed and there's no evidence that will happen."

Your letter of 26 September raised the possibility that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – protects those customers most in need of in-person support and assistance. It stated:

- The ATP process is formally regulated and enforceable by the ORR as part of an operator's licence.
- It requires operators to have clear measures in place when considering changes to station staffing levels to ensure the continued provision of unbooked assistance for passengers.
- Material changes at a station (which include staffing) must be reported to ORR.
- At the time of submission, operators must confirm that they have sought and considered feedback from local groups such as their passenger panel, accessibility forum and local user groups, as appropriate.

- Should significant or material changes be made to a revised ATP, then ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC), Transport Focus and (where relevant) London TravelWatch.

We think this could be an option but feel that it may require modifications to the ATP guidance. The key requirement 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 10: 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. You stated that, “The ‘day one’ mitigations (in place for the day a ticket office closes) may be an interim measure to manage the transition until a longer-term solution can be implemented. These longer-term solutions will have already been planned and approved/contracted, in development and are just waiting for delivery. The intention is for the ‘day one’ mitigations to act as a full mitigant to any specific issue, and therefore it is not seen as necessary to wait until a longer-term solution is in place before the ticket office closes but would also allow for wider station changes and arrangements that will assist with modernisation and efficiencies”.

As we set out earlier in this letter, we are not convinced that all ‘day one’ mitigations will be sufficient. In particular, in how some products (such as Railcards and cash refunds) may not be available on day one, especially for people who are unbanked or digitally excluded. This is already covered under objection 1 and 2.

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 7 and 8 and recommendation 2.

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

iii) Monitoring and review

We do not think there has been enough focus in plans on reviewing and monitoring changes should they go ahead. There 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 (TVMs). A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct. This regime must be in place before any changes took place.

Conclusion

Objection 11: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

7. Assessment for each station

Objection 1: We are not satisfied that passengers will retain easy access to key products at the following stations: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.

Objection 2: We are not satisfied that passengers reliant on cash will be able to access the railway in the same way as now at the following stations: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.

Objection 3: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented at all stations before any changes could take place.

Objection 4: Additional Floorwalking staffing hours should be provided for the stations and times listed above.

Objection 5: Additional Floorwalking resource should be provided at Basildon and Southend Central (Monday-Friday)

Objection 6: Staffing hours for West Horndon should revert to the current staffing times.

Objection 7: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 8: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

Objection 9: We are not yet satisfied that adequate safeguards exist to prevent passengers being penalised if they cannot buy the ticket they require from the station. This applies to the following non-CIC stations as they will not retain the ability to sell all tickets: Chalkwell, East Tilbury, Laindon, Leigh on Sea, Pitsea, Shoeburyness, Southend East, Stanford Le Hope, Thorpe Bay, Tilbury Town, West Horndon and Westcliff.

Objection 10: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

Objection 11: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

Station	Decision	Grounds for objection
Basildon	Objection	3, 4, 5, 7, 8, 10, 11
Benfleet	Objection	3, 4, 7, 8, 10, 11
Chalkwell	Objection	1, 2, 3, 4, 7, 8, 9, 10, 11
East Tilbury	Objection	1, 2, 3, 7, 8, 9, 10, 11
Laindon	Objection	1, 2, 3, 4, 7, 8, 9, 10, 11
Leigh On Sea	Objection	1, 2, 3, 7, 8, 9, 10, 11
Pitsea	Objection	1, 2, 3, 4, 7, 8, 9, 10, 11
Shoeburyness	Objection	1, 2, 3, 7, 8, 9, 10, 11.
Southend Central	Objection	3, 5, 7, 8, 10, 11
Southend East	Objection	1, 2, 3, 7, 8, 9, 10, 11
Stanford Le Hope	Objection	1, 2, 3, 7, 8, 9, 10, 11
Thorpe Bay	Objection	1, 2, 3, 7, 8, 9, 10, 11
Tilbury Town	Objection	1, 2, 3, 4, 7, 8, 9, 10, 11
West Horndon	Objection	1, 2, 3, 6, 7, 8, 9, 10, 11
Westcliff	Objection	1, 2, 3, 7, 8, 9, 10, 11.

Transport Focus
31 October 2023

Annex

1. Total objections received for c2c
2. Transport Focus's letter of 6 September
3. c2c's response to that letter.

Annex 1: Total objections received for c2c

Station specific objections:

Basildon	204
Benfleet	379
Chalkwell	419
East Tilbury	45
Laindon	298
Leigh On Sea	764
Pitsea	119
Shoeburyness	242
Southend Central	149
Southend East	351
Stanford Le Hope	147
Thorpe Bay	398
Tilbury Town	107
West Horndon	32
Westcliff	268
Total	3922

In addition to the 3,922 station specific objections listed above Transport Focus also received 26,046 responses objecting to c2c's proposals in general.

Total c2c objections: 29,968

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.

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.