Ticket office consultation – summary of the process and Transport Focus's assessment

Transport Focus has objected to train companies' proposals to close ticket offices. This overview sets out the consultation process, the criteria we used to assess proposals and the key assessments made in making this decision.

### Consultation process

The procedure for making a major change to ticket office opening hours is set out in the Ticketing and Settlement Agreement. 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 London TravelWatch.

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 Ticketing and Settlement Agreement. 13 train companies announced their plans simultaneously, of which 12 had stations in Transport Focus's operating area, the exception being Southeastern. Ticket offices in and around London in the consultation are covered by London TravelWatch.

Concerns about the consultation process were raised, especially over whether people (and especially disabled people) had adequate information on which to comment and over the short consultation period. We note that train companies subsequently made proposals available in alternative formats and published Equality Impact Assessments. We had previously 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.

The public consultation stage closed with Transport Focus and London TravelWatch receiving more than 680,000 responses. The top three issues in these responses were concerns over the ability to buy tickets in future (including difficulties in using ticket vending machines), 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. We analysed these responses and used them to help inform our decision on whether to object to the proposals for stations in our operating area.

Criteria to assess train company proposals

Under the Ticketing and Settlement Agreement, changes to opening hours may be made under the major change procedure if:

\* the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and
\* members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

Transport Focus can 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 Transport for a decision. The Department for Transport has published guidance setting out the approach the Secretary of State would take in these circumstances.

We believe it is important that there is as much transparency as possible surrounding the process and Transport Focus's role within it. To that end Transport Focus published a broad criteria to assess the proposals received. These contained many of the same themes set out in the Secretary of State's guidance document. Any proposal must set out how these passenger expectations will be met in future.

\* Passengers can easily buy the right ticket for the journey they want to make. This will include 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 will include arrangements for providing booked assistance (using the Passenger Assist process), assistance provided on a 'turnup-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 will include the information channels available at the station and the support available to help passengers who need assistance.

\* Passengers feel safe at a station. This will include 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 will include arrangements for issuing Penalty Fares or prosecutions for fare evasion.

\* Passengers can continue to use facilities at a station. This will include access to facilities such as waiting rooms, toilets, lifts and car parking.

These are intended to give an outline of the broad areas that have been considered. Transport Focus centred its assessment on the impact of the proposals on passengers and whether, in accordance with the terms of the Ticketing and Settlement Agreement, they represent 'an improvement on current arrangements in terms of quality of service'.

We also took into account any specific circumstances surrounding a station as well as issues raised by members of the public during the public consultation stage.

Key assessments

We have completed our analysis of the proposals which included reviewing responses received from members of the public and published our response to each individual train company.

Transport Focus acknowledges that the train companies have made significant improvements to their original proposals in response to concerns raised in the consultation, especially in reinstating staffed hours at many stations. However, having analysed these revised proposals we still have concerns. Therefore, in summary, Transport Focus has objected to the proposals to close ticket offices. Key assessments include:

### \* Welcome points

In response to concerns the train companies have proposed that 'welcome points' will be developed at stations as an initial focal point that provides any customer who needs support or advice a place to start their journey in the absence of a ticket office. We think there is merit in this idea but there is much that still needs to be developed. 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 disabled people and representative groups on the concept, design and implementation of welcome points. We also believe they should be piloted to establish what works best at different types of stations and to gather passenger feedback.

#### \* Access to rail products

At some stations we are not satisfied that passengers would continue to enjoy widespread and easy access to the purchase of rail products. This includes concern about the availability of key products such as Railcards and facilities for passengers reliant on cash. Where it was proposed that products would not be available at the station but could be purchased onboard the train, we also have concerns about clarity of information for passengers so they could buy with confidence and know they will not be penalised.

## \* Retail capacity

We are not satisfied at some stations that there are sufficient alternative retail options, typically ticket vending machines, to ensure that passengers can still purchase a ticket without a risk of excessive queues. Queuing time targets, monitoring and reporting for ticket vending machines (based on those currently in use at ticket windows) should be implemented to give passengers assurance before any changes take place.

# \* Station staffing

Most train companies significantly revised their proposals in response to concerns about a reduction in the hours at which stations would be staffed. However, at a minority of stations the proposals were still to reduce staffing hours. At these stations we are not satisfied that the proposals would represent an improvement for passengers requiring assistance, information, advice or for passengers' perceptions of personal security. It is also important that an alternative engagement/consultation mechanism is developed to provide passengers with confidence about any potential future material changes in staffing at a station.

### \* Robust monitoring and review

There must be a robust monitoring and review mechanism in place before any changes are made to ensure they are working for passengers. This should include queueing time metrics.

Transport Focus recognises that the way that 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 proposals were 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 assessment has been based solely on the specific proposals received for each station and the potential impact on passengers.

## Response to individual train company proposals

Transport Focus's formal response to individual train companies' proposals can be found alongside this summary document. Those responses outline comments received during the public consultation and set out Transport Focus's conclusions for each individual train company. This includes an overview of the number of representations we have received and the main issues raised in the consultation.

If you would like any of our ticket office consultation documents in a different format, please contact us by:

- \* Email: advice@transportfocus.org.uk
- \* Telephone: 0300 123 2350

\* Post: FREEPOST, RTEH-XAGE-BYKZ, Transport Focus, PO Box 5594, Southend on Sea, SS1 9PZ.