

Mike Hewitson
Head of Policy
Transport Focus
9th Floor Rail House
Store Street
Manchester
M1 2RP

27 September 2023

BY EMAIL

Dear Mike,

Ticket offices: emerging issues and clarification questions

Thank you for your letter dated 6 September outlining emerging issues from TPE's public consultation regarding changes to ticket offices and setting out further clarification questions.

As you are aware, we have held several meetings with Transport Focus representatives regarding our proposals, to discuss and respond to your feedback to date. We have provided additional information and clarification during and outside these meetings, which cover many of the issues you have raised in this correspondence, which we are happy to set out in writing.

We note Transport Focus has set out the criteria you are using to assess proposals. In our public consultation document, we noted that this consultation forms part of the Schedule 17 Ticketing and Settlement Agreement (TSA) Major Change process ([Secretary of State for Transport's Ticketing and Settlement Agreement ticket office guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/secretary-of-state-for-transport-s-ticketing-and-settlement-agreement-ticket-office-guidance)).

As you will be aware, under this process, more significant changes to opening hours, including the full closure of a ticket office can be made where:

- a. the change would represent an improvement on current arrangements in terms of quality of services 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.

At the heart of our proposals is a desire to make our staff more accessible and available to customers. Passenger assistance requests are now increasing after a period of low demand during Covid, whilst transactions at ticket offices have declined significantly as customers are increasingly choosing to purchase their tickets through digital channels. Our proposals seek to modernise the way we provide

customer service at stations, putting our staff where they can help more customers and providing greater value for money for our communities and taxpayers.

We have provided Transport Focus information to demonstrate how we believe our proposals meet the requirements of the TSA process including how:

- customers will still have widespread easy access to be able to purchase rail products either at the station or via other channels;
- customers will know when staff are scheduled to be at the station if they require staff assistance;
- customers will continue to be able to access other station facilities, such as waiting rooms and toilets, as currently provided;
- customers will continue to be able to use our stations confidently and safely to access the rail network; and
- customers with accessibility needs will continue to be supported to be able to access rail services in line with our Accessible Transport Policy

On average only 8% of customers are purchasing their tickets at a TPE ticket office and some of TPE's ticket offices on average now handle six or less transactions per hour. As part of our consultation proposal, we suggested adjustments to staffing times based on customer demand data, proposing station staffing at the busiest times of the day. At nine stations we proposed reduced staffing times, where data demonstrated in the hours proposed to become unstaffed, there are extremely small numbers of ticket transactions (on average four transactions per hour) and an average of six passenger assists per week in total across all nine stations, that could be supported by on board staff or alternative travel arrangements.

TPE developed our proposals to tailor our station operations to meet changing customer behaviour, whilst ensuring all customers could continue to access our services.

Whilst Transport Focus continues to process the public consultation responses, it is clear there has been a significant response from the public, stakeholders, our staff and trade union representatives to the proposals made by TPE and other operators.

We have always maintained that we would listen to feedback and that this would be a meaningful consultation. We can clearly see from the public feedback received, that there is widespread concern regards our proposed changes to staffing times. We have also noted the Rail Minister's recent comments and expectations regards station staffing and taken these into consideration.

Consequently, we are proposing to amend our plans to maintain existing staffing hours at each station. This means, whilst we are still proposing to close ticket offices at 14 stations, we do not propose to reduce staffing times at any station and the following stations: Brough; Cleethorpes; Dewsbury; Grimsby; Malton; Northallerton; Scunthorpe; Stalybridge; and Thornaby, would remain staffed to the same hours as currently provided.

We thought it was helpful to highlight this proposed revision to our plans at the outset of this response, as it has a significant bearing on many of the issues you have raised in your correspondence.

We have set out below our high-level response to each of the sections in your correspondence and provided a full response to each of your clarification questions in the attached Appendix.

We appreciate that you are still processing public consultation responses which may result in further questions. As discussed in our meetings, we would welcome the opportunity to discuss and resolve any further queries that may arise from your review of all consultation comments before you make a final decision regarding our proposals.

Issues in relation to whether passengers can easily buy the right ticket for the journey they want to make

Adequacy of retail

We can confirm our proposal is not reliant on passengers switching to purchase tickets online rather than at the station. However, we have demonstrated that customers are continuing to choose to switch to digital channels, with online purchases accounting for 75% of tickets sold in recent periods compared with 69% last year and around 50% in 19/20.

We have analysed ticket purchases at unstaffed stations and provided Transport Focus examples where ticket offices have closed, to demonstrate that whilst we expect a proportion of customers to switch initially to Ticket Vending Machines (TVMs), customers will also move to digital channels and that based on data trends this channel can reasonably be expected to continue to grow.

We note in your correspondence concerns regards the ability for TVMs to cope at peak hours and during seasonal periods of higher demand. We have recently provided information about existing TVM usage and demonstrated, thanks in part to investment already made in providing additional TVMs, there is ample capacity to absorb extremely high levels of ticket office transactions in the busiest hours and for there still to be available capacity to cater for any seasonal uplift.

Whilst we have overall very good levels of capacity to absorb increased transactions, we have identified and highlighted to you that at Stalybridge, capacity gets close to full capacity if 80% or greater levels of ticket sales transfer to the TVM in the busiest hours. Although we do not expect this level of channel shift to TVMs, to minimise any risk of long queues for customers we have already confirmed that we propose to provide an additional TVM at this station.

Your correspondence indicates that from the data provided there are still significant levels of sales at some ticket offices. The data we have provided shows that the two ticket offices we are proposing to retain account for 40% of all ticket office sales at TPE's 16 stations. Manchester Airport and Huddersfield handle on average 620 and 487 transactions respectively each day (Monday-Friday) which is around twice as much as our next busiest ticket offices: Middlesbrough and Hull, which have a daily midweek average of 288 and 227 transactions, which equates to an average of 19 and 17 transactions per hour, respectively. The rest of TPE's ticket offices have an average of 16 or less transactions per hour; eight ticket offices have 12 or less transactions per hour and of these, five ticket offices have an average of less than 6 transactions per hour. Sales at ticket offices proposed to close are not in our view high and have shown substantial and continued decline in the number of transactions.

As outlined in our original proposal, 67% of tickets sold at ticket offices are available on our new TVMs and this will increase to 97% when planned upgrades to include advance purchase products are delivered. We have kept Transport Focus updated that this committed and funded upgrade is now due to be completed by February 2024. For products which can only currently be retailed at a ticket office (around 0.3% of products) we have committed to maintain the ability for our station staff to retail these limited number of products at all our stations. We therefore do not believe customers are facing a significant reduction in what they can purchase at stations, and we have demonstrated how all products and service can continue to be provided. It is also worth noting that most customers do not purchase their ticket at the station; in 22/23 on average across our staffed stations only 11% of transactions for journeys were made at the station (8% ticket office, 3% TVM) and 'at station' retailing continues to decline.

When assessing changes to ticket office opening hours, we note the TSA does not require all products to be able to be purchased at the station, but that customers can continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change. We believe the information

we have provided demonstrates that widespread and easy access of rail products will still be available and believe our proposal is comparable with other proposals that have previously been made for ticket office closures in this regard.

We have provided a detailed response to the specific TVM and product questions in the Appendix.

Availability of staff to provide retail advice and help

Based on our revised proposal, retail trained staff will be available to assist customers with purchasing tickets as per current ticket office opening times.

We understand that there is concern about how customers will locate staff if the ticket office is closed. This is a point we picked up in our proposal in our Equality Impact Assessments, where we indicated we would ensure there is a means by which a customer can contact a member of staff at the station if they are not visible. Most of TPE stations are relatively small and therefore we do not envisage it will be difficult for customers to find a member of staff, who will generally be in and around the ticket office area of the station and close to the TVMs.

We recognise the ticket office area is at most stations a natural focal point and although each station is different in its size and layout, we will ensure through changes to wayfinding, signage and customer information that it is clear to customers where they can expect to find assistance and staff, such as a designated welcome point, and how to contact staff if they are not there because they are undertaking other station duties.

Paying by cash

We have provided data which shows the percentage and volume of cash payments at our stations and discussed this in our meetings. As discussed, the overall volume of transactions at many of our ticket offices is relatively low and therefore although there are high percentages of cash transactions recorded, this is a high percentage of a small number. We have provided cash transactions by hour data, which demonstrates the five locations we have already selected for a cash TVM have the largest number of cash transactions overall. However, through this analysis we have also noted that Middlesbrough has some double digit, cash transactions at the ticket office in some hours, which we think additionally justifies a cash TVM at this location, which we now plan to provide.

Elsewhere, the levels of cash transactions do not in our view warrant a cash TVM as volumes are extremely low. Thornaby for example has an average of three cash transactions per hour and Grimsby two per hour. We reasonably expect some customers currently using cash may be able to pay by card, however if cash is a customer's only means of payment, where a cash TVM is not available they will be able to purchase their ticket on board with cash as outlined in our consultation proposal.

Issues relating to whether passenger requiring assistance to travel receive that assistance in a timely and reliable manner

As you have noted, our original plans did not propose any staffing changes to Selby or Thirsk where a barrow crossing is in operation. In 22/23 there were around 16,000 Passenger Assists (Booked and Turn Up And Go) at our 16 staffed stations. 16% of these assists took place during existing unstaffed hours, where the assistance would have been provided by the Conductor. Under our original proposals, around 2% of these assists would have been in hours when the station would have become unstaffed, equating to around six assists per week in total across the nine affected stations. In these circumstances the Conductor would have assisted the customer or if the customer needed assistance through the station, such as a sighted guide, the customer would have been provided an accessible taxi to the nearest station where such assistance could be provided. However, based on our revised proposals to maintain staffing hours, there is now no change to our current provision of assistance proposed.

Issues relating to ensuring passengers are not penalised if they cannot buy the ticket they require from the station

We have been clear in our consultation proposal and in our discussions that customers will not be penalised as result of our proposals. Our penalty fares scheme already operates across unstaffed stations and stations that do not have cash TVMs. Conductors and on-board revenue protection staff have knowledge and understanding of what tickets and facilities are available at stations which our services call. If a customer cannot purchase the ticket they require because we cannot accept cash and this is their only means of payment, the customer will be able to buy a ticket on board from either the Conductor, or on-board revenue protection staff, using cash. Comprehensive information will be provided for our staff and for customers ahead of any implementation so they know exactly where and how particular products can be purchased. Our staff will also be at stations to help guide and support customers through this change and to provide reassurance to customers that they can buy on board without penalty if the facilities available have not allowed them to purchase a ticket in advance.

Issues relating to whether customers can continue to use facilities at a station

Transport Focus has correctly understood that as part of our original proposals station facilities such as lifts, waiting rooms and toilets would be available even where we were planning to reduce staffing hours. As we are not now proposing to alter staffing hours, alternative arrangements will not be required to maintain the current level of customer facilities.

Other issues

Future changes

We understand the public's concern regards potential future changes to station staffing, however regulation already exists to ensure continued provision of customer assistance. Train operators have a licence condition that mandates having an Accessible Transport Policy (ATP) approved by Office of Road and Rail (ORR) which must meet required standards to ensure the accessibility of our services, including the provision of assistance for customers who book or wish to Turn Up And Go. Operators cannot make any changes to ATPs without approval from ORR and when making changes 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. Furthermore, if an operator proposes a significant change, such as to staffing, the ORR's guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies (Transport Focus) by the ORR before any new or amended ATP is approved.

More generally, operators also have legal equality and safety duties that would always be considered as part of any proposed changes to the operation of our stations, including the provision of staffing. We trust that this helps give Transport Focus and the wider public assurance that operators TPE and other operators would need to satisfy existing regulatory and legal mechanisms should they wish to propose any future changes to station staffing.

Timing of mitigations

As discussed in our meetings, we do not propose to close ticket offices until after the planned upgrade to our TVMs to provide advance purchase products is delivered, which is currently scheduled to be completed by February 2024.

TPE has a further phase of upgrades to its TVMs planned for delivery later in 2024 and is actively participating in industry fares and ticketing reform, which in combination will provide even greater customer convenience with more increased product availability on the TVM and through fares simplification and modernisation. However, based on our proposals and the level and type of transactions taking place at our stations, we do not need to wait for further TVM enhancements or

fares reform to be able to provide a better quality of service for customers. Our proposals will enable staff, who at many stations serve a small number of customers at the ticket office, to be available to provide help and assistance to a greater number of customers using the station, 92% of whom on average, have bought their ticket digitally or through another channels.

Liaison with other operators

TPE has followed the TSA process and notified all operators who use our stations of our proposals. As outlined in the information provided to Transport Focus at the start of the consultation, we have confirmed that the services that TPE currently provides other operators at our staffed stations, such as dispatch or provision of onboard retailing equipment, are not affected by these proposals. As part of the TSA process, we have not received any objections to our proposals from other operators.

TPE is committed to providing the best possible service to our customers and being a good and efficient operator of its services and stations for the government. We believe that our station operating model needs to change to better serve customers, who are increasingly shifting to more convenient digital channels for retailing which will allow our station staff to provide better service to a greater number of customers outside the ticket office.

We trust the information we have provided demonstrates TPE has developed robust proposals for the changes proposed to our ticket offices and that we are also taking account of the feedback received to refine our proposals as part of the consultation process.

We look forward to continuing our collaborative discussions and receiving your station specific assessment of our proposals in due course.

Yours sincerely,



Louise Ebbs
Strategy Director



Appendix 1

TPE Response to Transport Focus’s Clarification Questions

Response to each clarification question received on 06 September, separated by issue area as set out in Transport Focus letter.

Issues relating to whether passengers can easily buy the right ticket for the journey they want to make.		
Ref	Transport Focus Question	TPE Response
TPE01	What assumptions have you made about how many / what proportion of people will move to digital channels if ticket offices are closed?	We have modelled how we expect customers to shift channels following closure of ticket offices and provided Transport Focus with this information. Our assumptions are based on customer trends, analysis of channel split at unstaffed stations as well as what has occurred following ticket office closures elsewhere.
TPE02	Do you have any existing programmes designed to help people migrate to digital channels and if so, how effective have these been?	<p>We regularly run programmes and advertising to drive traffic to our digital channels and this is an ‘always on’ approach across Pay Per Click (PPC), Display, Social and App download activity all pushing to the TransPennine Express Website and App. Activity has been limited recently due to the impact of industrial action; however we are expecting an upturn in this activity from early 2024.</p> <p>When active, our advertising and promotional campaigns such as Club 55 or other discounted/sale activity always includes reference to the TPE website and/or app as a call to action.</p> <p>We are also about to introduce sTicket (mobile phone-based barcode tickets) for season tickets. Evidence from other operators suggests that sTicket is very attractive alternative to paper ticket holders. In addition, we are constantly introducing enhancements to both our webTIS and mobile retail app to make them easier to use. TPE is also part of RDG’s working group - Moving to Digital, where collectively the group are focused on developing further initiatives to help more people migrate to convenient digital channels.</p> <p>TPE’s activity to date has successfully supported significant customer shift to digital channels. In P5 23/24 (August 23) over 75% of journeys made on TPE were made using a digital ticket. This is 4% higher than the same period last year and higher than the national average of around 68%, as well as being significantly above the 2019/20 level of c.50%.</p>

TPE03	Have you made any assessment of who will not / cannot move to digital channels and the effect on them of closing the ticket office?	We have carried out Equality Impact Assessments on our proposals and proposed several mitigations to support people who may struggle to use digital channels and who may not be able to use TVMs independently. These mitigations include the provision of staff with tablets to provide information and to aid use of TVMs, a Try The Train Day program, the retention of facilities at the station to allow staff to retail the limited number of products not available through TVMs or other channels, the ability to buy on board in line with our Accessible Travel Policy, and the ability to purchase tickets over the telephone.
TPE04	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?	Our assumption, based on evidence of previous ticket office closures, is that we will not see a decrease in the number of customers travelling, especially as staff will be more readily available to help customers at the station and will still be on hand to assist customers with ticket purchases.
TPE05	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 (ToD) collection per hour from the TVM?	<p>Yes, we have carried out in-depth analysis of our TVM capacity at all locations which has been provided to Transport Focus. This modelling demonstrates that there is sufficient capacity to absorb expected sales migrating from the ticket office. We carried out sensitivity analysis which took into consideration the number of ToDs issued by both the TVM and ticket office at each location.</p> <p>We calculated TVM "capacity" by observing customer transactions to derive a typical transaction time at a TVM. We were then able to produce the total capacity at each location for TVM transactions per hour based on this transaction time and the number of TVMs present at each location. We used industry sales data to identify the busiest hour at the ticket office at each location on a weekday, Saturday and Sunday. We then forecast the future number of TVM transactions in that busiest hour if 30% and 80% of current ticket office transactions switch to TVM. We compared this number to the TVM capacity per hour to produce utilisation figures for each location. Most locations at most times were well below 50% utilised, even when 80% of ticket office transactions were modelled, with the highest utilisation being Stalybridge at 80% on a weekday.</p> <p>Whilst the TVM at Stalybridge was still shown to be operating within its available capacity, it would, if very high levels of customers transfer from the ticket office (80%-100%) be getting close to its maximum capacity. Even though we do not expect this level of channel shift to TVMs we are now planning to provide an additional TVM at this location to minimise the risk of queuing and inconvenience for customers.</p>
TPE06	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?	As outlined above we have carried out in-depth analysis of our TVM capacity at all locations based on the busiest times of day and have demonstrated that there is sufficient capacity to absorb sales migrating from the ticket office. As highlighted in our

		original proposal TPE has increased the number of TVMs at our staffed stations from 29 to 43 and with the proposed additional increase at Stalybridge, this will increase to 44, a 52% increase in TVM capacity across our staffed stations.
TPE07	What assessment have you made of the impact of seasonal peaks, especially at tourist destinations such as Scarborough?	We are aware that Scarborough will likely have higher TVM utilisation in the summer. However, the average utilisation for the busiest hour on the busiest day (Saturday) at Scarborough is 50%. Therefore, demand in a seasonal peak would need to be 100% more than the average to breach available capacity. Seasonality analysis shows that the summer period is typically only 40% busier at the ticket office than the annual average and therefore we are confident there is sufficient capacity to cater for seasonal peaks.
TPE08	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?	We are in the latter stages of rolling out our planned new fleet of TVMs across all our staffed and unstaffed stations. As part of the roll-out we assessed the location of each TVM and can confirm that they are all positioned in and around the main passenger thoroughfares, they are all in accessible locations and all are available for use between the first and last services.
TPE09	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?	If there is a queue on the station, we will expect our colleagues to proactively support and assist customers. At Hull, Manchester Airport, Huddersfield and Dewsbury revenue protection gate line staff will be available to sell tickets with handheld ticketing devices. We have not proposed handheld ticketing devices for other station colleagues as our analysis of TVM capacity does not indicate this will be necessary.
TPE10	How will the adequacy of retail arrangements at stations be monitored and reported, including to passengers? What KPIs will be in place?	As part of our internal periodic reporting, we monitor the volume of sales made through each of our retail points and the availability of our retailing equipment. We also monitor the availability of TVMs and other retail arrangements at the station via our Mystery Shopper Programme and via our Service Quality Regime inspections.
TPE11	What impact is there on impartial retail obligations, which currently applies to ticket offices. Will similar obligations be put onto other channels?	Impartial retail obligations form part of the Ticketing and Settlement Agreement (TSA) which applies to regulated ticket offices. The TSA does not apply to other channels.
TPE12	Are there any other products, not mentioned in the list above (see page 3 of letter), that passengers will no longer be able to easily purchase from the station if the ticket office is closed?	<p>Many of the products and services you have listed will still be available at the station as set out below.</p> <p>The following products from your list are already available at the station on our TVMs</p> <ul style="list-style-type: none"> • "Non host" origin • Off-Peak before off-peak begins • Scholar tickets - where a local travel scheme applies • Boundary Zone add-ons - we are assuming this refers to local PTE schemes (like West Yorkshire Metro). These tickets and can be purchased at a TVM, online or on board.

		<p>The following products will be available at the station as part of a planned upgrade to our TVMs due to be delivered in February 2024. At this point 97% of products will be available from our TVMs.</p> <ul style="list-style-type: none"> • Advance Purchase (AP) for future dates as well as AP on the day <p>The following ‘unusual products/services’ from your list will still be available at the station on request because they are not currently available through any other channels</p> <ul style="list-style-type: none"> • Use of rail vouchers if product cannot be retailed on board i.e. AP • Use of rail warrants if product that cannot be retailed on board i.e. AP • Photocards for season tickets – if a customer specifically requests, however we are now retailing seasons to smartcard which do not require a photocard so do not expect these to be required going forward. 75% of seasons are already on smartcards. • Paper season ticket replacement – as above customers moving to smartcard • Other TOC Group Save (TPE Group Save is an online only product) • Esk Valley Railcard • FIP – International staff discount ticket • Platform Ticket – available on request although not required at TPE stations • Sleeper bookings • Ferry Connections – we assume this relates to Rail & Sail. We do not believe there have been any sales of this product at TPE stations in the last 12 months <p>The following products/services from your list are planned and funded to become available on our TVMs (see response ref TPE 14), however, these products are also available via other channels</p> <ul style="list-style-type: none"> • Car park tickets – available via APCOA App and call centre and part of TVM Upgrade Phase 2 • Seasons (longer than weekly) - available online and telesales and part of TVM Upgrade Phase 2 • Cycle reservations - available via the social media team and part of TVM Upgrade Phase 2 • Seat reservations – available online and as part of TVM Upgrade Phase 2. In meantime we will additionally make available via social media team • Rovers and rangers – available online and on train with plans to make available on TVM as part of RDG TVM enhancement programme
--	--	--

		<p>The following products/services from your list will no longer be available at the station if the ticket office closes as they are readily available through other channels</p> <ul style="list-style-type: none"> • Plus Bus - available on board • CIV - available on board • TfGM Wayfarer/Countycard - available on board • WY Daysaver - available on board • Railcard sales – available online. 80% railcards already sold online including all disabled railcards which are only available online. • Refunds - available from customer contact centre and online • Staff travel discounts – rail staff product available online • Changing a booking – available online and via customer contact centre • National concessions for disabled people – available on board <p>Please also see TPE 14 response for a list of other products that will be available as part of a Phase 2 upgrade expected later in 2024</p>
TPE13	How will passengers access any products and services no longer easily available from the station in future?	<p>Around 67% of all sales made at a TPE ticket office could have been made using a TVM. This will rise to 97% when the planned upgrade to functionality is added to the TVMs in February 2024. For products and services that cannot be retailed via any other retail channel the customer will be able to buy through the retained ticket office machine at 14 out of 16 staffed stations or via other channels such as digital, on board to ticket offices that remain open.</p>
TPE14	We understand that TPE plans to upgrade TVM functionality, what will this upgrade cover and when would it be complete?	<p>We will be making Advance Purchase products available on our TVMs by mid-February 2024.</p> <p>Other Phase 2 TVM enhancements on the committed and funded TPE developmental roadmap include:</p> <ul style="list-style-type: none"> • eTicket Fulfilment (to the customer's phone digital wallet) • Bus Departure Boards • Car Park tickets • Last Minute Reservations • Promise to Pay • Multilingual support • "Popular destinations" (allowing customers to purchase the most popular fares in 4 taps or less) • Remote Video Assistance • Shopping Basket

		<ul style="list-style-type: none"> Period Season Ticket sales/renewals to smart cards (Seasons tickets longer than weekly) <p>We are working with our supplier on a timeline for these features to be introduced and expect the majority to be introduced during 2024</p> <p>Other TVM Enhancements</p> <ul style="list-style-type: none"> Rangers and Rovers <p>RDG is coordinating a programme of upgrades to TVMs on behalf of the industry. TPE has requested that rangers and rovers form part of this programme. We understand RDG has secured in principle agreement to funding from DfT with timescales to be confirmed.</p>
TPE15	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?	Customers will always be able to purchase "walk-up" tickets from our TVMs. We are aware that if there is no availability on some services which are marked as "mandatory reservations" then some digital channels do not allow customers to buy "walk-up" tickets. This is not an issue on TPE TVMs.
TPE16	We understand that TPE plans to retain the ticket office machine so that staff – there 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?	<p>Please also refer to response ref: TPE12 for a list of 'on request' unusual products at stations.</p> <p>Customer information at the station and through other relevant information channels will indicate which 'unusual products' can be purchased on request at stations. A customer will need to speak to member of station staff if they wish to purchase one of these products. This service will be provided for a small number of products which are not available through any other channels. We will keep this facility in place until such time as these products can be retailed through other channels or it is demonstrated there is no demand for them.</p> <p>We are not proposing to retail railcards at stations where the ticket office is closed as they are available online and 80% of railcards, including all disabled railcards, are already sold this way.</p>
TPE17	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?	This has been considered however, the TVMs and hand-held devices share a very similar range of products, and as demonstrated by our modelling there is ample capacity with our TVMs such that we do not consider it necessary to provide additional handheld retail equipment.
TPE18	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?	As outlined in our response ref TPE 12, most products will continue to be available at the station. The small number of products which will not be available on TVMs will be readily available either online, on board and/or through other channels and for the very limited

		products which can only be retailed at a ticket office, we are retaining the ability to retail these 'unusual products' on request at the station.
TPE19	How will someone who cannot use a TVM, for example an older or disabled person, purchase a ticket?	During hours which the station is staffed, a member of staff will be able to assist the customer to use a TVM. Outside of these times, customers will be able to purchase tickets from the Conductor. In addition, tickets are available over the telephone from our Passenger Assist Team or Northern's telesales service. Additionally, customers can purchase tickets via our website, App or a third-party retailer.
TPE20	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)?	At times when staff are at the station, they will primarily be based around the TVM area to support and assist customers who wish to purchase tickets. We are also planning to install a call alert device that customers will be able to use to alert a member of staff that assistance is required if they are not there.
TPE21	Will TVMs be upgraded to offer remote access/video help facilities so passengers can access assistance when staff are not present?	Yes, video help point functionality is part of our future funded roadmap of TVM developments with our supplier. However, it is unlikely to be available before the end of 2024 given the other developments and the complexity of this functionality. We already have help points at all our stations which can be used for train service and other questions. Given we are proposing to maintain staffing hours to the same hours at currently provided there is no change to current levels of staff assistance.
TPE22	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.	Sunlight was considered as part of the installation process, and where possible machines have been positioned to avoid being in direct sunlight all day. Outdoor machines have a screen rated at double the brightness of the indoor machines and therefore will function correctly even if exposed to direct sunlight. Shelters were considered, but previous experience has shown that customers dislike the experience of using a TVM in a confined shelter, and shelters increase the risk of vandalism and anti-social behaviour. The only TVMs located within shelters are at Seamer and Yarm where these machines could not be located on the platforms due to space constraints and close proximity to the running lines.
TPE23	How accessible is your app and your website, especially for those with a disability?	We are in the process of working towards our WCAG accreditation for our website, and our smartphone app is accessible with both Voiceover and Talkback. We are currently on track to reach our WCAG certification in January 2024.
TPE24	What are the contractual SLAs for fixing 'out of order' TVMs and have these been reviewed given the future importance of TVMs?	We have recently replaced our fleet of Ticket Vending Machines with brand new equipment. As part of this process there was an extensive review of SLAs which included bringing in weekend cover for the first time across all stations. Given this recent review, we do not propose to undertake a further review.

		<p>We are also due to deploy new "Remote Monitoring" functionality by the end of March 24 that will enable the TVMs to 'self-report' for the first time. In addition, we are working on an interim measure that should allow the TVMs to provide these fault messages to the supplier before the end of December 23. This will further reduce downtime as the faults will be logged automatically and without staff intervention, resulting in the contracted response times being triggered quicker than is practical currently.</p> <p>The current SLAs are: Supported Hours 06:00 - 20:00 Monday - Friday 08:00 - 16:00 Weekends and Public Holidays</p> <p>Priority 1 (Full outage - single machine station, or full outage at multi machine station) 8 hours (Software) / 8 hours (Hardware)</p> <p>Priority 2 (Failure of single machine at multi-machine location or partial component failure of a single machine at a single-machine station where the machine remains in service) 14 Hours (Software) / 9 Hours (Hardware)</p> <p>Priority 3 (Partial component failure where machine remains in service at a multi-machine station) 42 hours (Software) / 18 hours (Hardware)</p> <p>Priority 4 (Issue that does not impact the machine's ability to retail in any way) 10 working days (Software/Hardware)</p>
TPE25	Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?	Where we propose to close a Ticket Office, we will continue to use reasonable endeavours to ensure that customers do not experience long queues, which is why we have modelled capacity and made additional investment in TVMs. We will introduce the monitoring of queueing times into our Mystery Shopper Programme.
TPE26	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?	Our rationale was based primarily on transaction data, where we could see ticket office volumes could be readily handled by staff outside the ticket office. Even though customer transactions at stations have declined at all stations, Manchester Airport and Huddersfield ticket offices remain significantly busier than any of our other ticket offices, and together represent 40% of all transactions at TPE stations. We therefore think these stations need a combination of ticket office staff and floor walkers to provide the best

		service to customers and to manage current volumes of ‘at station’ retailing. Hull is our fourth busiest ticket office, but it handles only 35% of the level of daily transactions as Manchester Airport, with an average of 17 transactions per hour. We therefore believe the ticket office staff at Hull could provide better customer service to a greater number of customers by being located on the main concourse, closer to rail customers, rather than being in the ticket office at the far side of the interchange.
TPE27	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?	We have adjusted our staffing proposals based on consultation feedback to ensure staffing hours remain as currently provided, which cover the morning and evening peak times at all locations, and staffing levels are increased from our original proposal to demonstrate we have sufficient staff to cover retail as well as other duties.
TPE28	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?	Colleagues who previously worked in ticket offices and are redeployed will retain a significant amount of knowledge about fares and ticketing relevant to their locations already. Therefore, we do not foresee additional ticketing / product training being necessary for these individuals, but we will offer training for employees as required. For new entrants, we will offer a range of suitable training on an individual basis, including product and retail training.
TPE29	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?	We are planning to install a call alert device positioned at, or as close to, the entrance of the station in the concourse/ waiting area that customers can use to alert a member of staff that assistance is required if they are not there. Our staff are trained and skilled to provide great customer service and already demonstrate their ability to manage situations where customers may be looking for help and advice at the same time, such as when required to support a customer who has booked assistance and other customers may need help with retailing.
TPE30	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?	Manchester Airport is TPE’s busiest ticket office with an average of 620 daily midweek transactions. However, the volume of transactions made at the ticket office for journeys to/from this station represents only 6% of total transactions in 22/23 having dropped from 9% in 19/20 as customers are increasingly purchasing their tickets online. We have analysed the volume of transactions per hour and propose to retain the ticket office during the periods of highest demand when we see peak numbers of passengers arriving at the station from flights into Manchester. To provide the best service to customers and manage the periods of peak demand we will have staff outside the ticket office when it is open to queue bust and also when it is closed, supporting customers to purchase tickets from the 8 TVMs we have at this location. As part of our planned and funded TVM development these TVMs will also have multi-lingual functionality in the future.

TPE31	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?	Under our proposals, which are subject to TU consultation, we are proposing to introduce General Purpose Relief into the rosters for most of our stations. In effect, this means more stations will provide their own relief for annual leave and periods of short-notice absence, rather than requiring cover from a different station.
TPE32	Have you considered providing cash TVMs at more stations?	TPE has already invested in new and additional TVMs, increasing numbers at our staffed stations by 50% (from 29 to 43). Through this programme we had planned for 7 cash TVMs at the five locations with the highest cash sales. We have provided Transport Focus details of cash transactions by hour, which demonstrates the five locations we have already selected for a cash TVM have the largest number of cash transactions overall and by hour, however we have also noted that Middlesbrough has some similar, double digit, cash transactions at the ticket office in some hours, which we think additionally justifies a cash TVM at this location which is now planned.
TPE33	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?	Our cash TVMs include a real-time dashboard that can be viewed by station staff and includes a monitor of cash levels within the device. Should levels of coins or notes become too high (or too low) station staff are able to act accordingly. Therefore, our TVMs will be able to cope with any increase in cash sales. Based on our wider analysis of transactions by hour at locations with cash TVMs we have demonstrated they will be easily able to cope with the extra demand if ticket office transactions migrate to TVMs.
TPE34	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?	If a customer can only pay by cash, they will be able to buy their ticket on-board. Signage is designed to the national Penalty Fares standard. If industry-level changes are made to the Penalty Fares scheme, we will update signage accordingly, however this is not expected at this stage. We will update our on-line revenue protection policy to reflect any changes if ticket offices close in line with our proposals.
TPE35	How will passengers paying with cash be able to access the full range of products listed above (in relation to TVMs on page 3)?	Passengers who are only able to pay with cash can purchase products at the TVM, or on-board the train where no cash TVM is available. We have committed to provide an additional cash TVM at Middlesbrough, which means the six stations with the highest volume of cash transactions will all retain a cash payment facility. Cash transactions at other station ticket offices are on average 3 transactions or less per hour.
TPE36	Disabled passengers may be more likely to use cash when purchasing tickets. Are all cash TVMs at accessible (step-free) locations in the station?	All our TVMs (including the cash and card variants) are in accessible step-free locations at our stations

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

Ref	Transport Focus Question	TPE Response
TPE37	When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?	As station staffing hours will be maintained, 'Turn Up and Go' assistance for passengers will remain the same. Outside of staffed hours, customers are advised to use a help point to contact a member of staff in Control or to approach the Conductor when their service arrives. This is the same process which is currently in place for the provision of assistance outside of station staffing times.
TPE38	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?	As per current procedures, once the station is unstaffed, a customer will have access to the help point on the station 24/7, and our social media channels are also available 24/7. A customer can also ring the Contact Centre between the hours of 06:00 hours to 23:00 hours and the stations will continue to be monitored via CCTV within our Control Centre 24/7. As per current arrangements Conductors check down the platform once the train has arrived at the Station, and the Control Centre may contact the Conductor proactively if they see a passenger requiring assistance arrive at the station who has not booked.
TPE39	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?	Based on retaining our current staffing hours at stations, we do not expect there will be any increased reliance on accessible taxis as a result. Taxis for customers are generally easy and reliable to source; over the last 12 months, we have been able to source 99% of planned taxis and 97% of the emergency taxis that we have requested (this is inclusive of bookings for accessible taxis). Our taxi resourcing is done via a supply partner who specialises in taxi management and has commercial agreements in place with numerous local taxi suppliers across our network. Taxi provision is monitored daily with the supply partner.
TPE40	What monitoring regimes are in place to measure time taken and reliability?	We expect to continue to monitor satisfaction through our post-trip surveys which we conduct with a sample of customers who have used assisted travel, regardless of whether pre-booked or 'Turn Up and Go', every period.
TPE41	How will people summon help if staff are not available at the station?	We are planning to provide a call alert device positioned at, or as close to, the entrance of the station that will alert a member of staff elsewhere at the station that assistance is required if they are not there.
TPE42	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	Following works by Network Rail, the roll out of tactile paving to TPE managed stations is nearing completion. Some work is still required at Northallerton to bring the existing tactiles up to current standards, but all other stations are now compliant. Northallerton is due to be completed by mid-October 2023. Announcements warning customers regarding the lack of tactiles will continue to be played at Northallerton until the works

	mitigations can be taken to ensure the safety of visually impaired passengers?	are completed. We also have the GoodMaps Explore smartphone app which customers can use for turn-by-turn directions around the station to help aid independent travel and improve safety.
TPE43	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?	Staffing levels at Manchester Airport, Huddersfield and Hull Paragon cover 24 hours a day, and at our other 13 stations the staffing levels cover the majority of the day, including the busy morning and evening peak times, and weekends. Therefore, staffing levels at all our stations remain sufficient and appropriate to ensure assistance can continue to be offered at busier times, alongside other duties.
TPE44	What assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?	Our highest priority is to ensure the safety of all users of the railway while carrying out our day-to-day station duties, including assistance. Our Accessible Travel Policy includes a commitment to meet passengers within five minutes and we will continue to strive to meet this target.
TPE45	How will staff at the station know if passengers need help to board the train?	Pre-booked assistance will still be booked via the Passenger Assist system so station staff and Conductors will be able to see pre-booked assists as they can today. During staffed hours, there will be no changes to the provision of TUAG assistance. Outside of staffed hours, customers will be advised to use a help point to contact a member of staff in Control or to approach the Conductor when their service arrives. We will continue to run our program of enhanced disability and equality training which includes a section on how to deliver assistance as well to identify customers who may need assistance (including those with hidden disabilities).
TPE46	How will the focal point of the ticket office/window be replicated?	The concourse / waiting area will remain the focal point of our station and include all the information which customers will need. This will be the location for our British Sign Language departure board and our proposed digital solution for summoning a member of staff if they are not there. At most stations, this area is also the location of the TVMs. This will also be the meeting point for customers wishing to use Passenger Assist.
TPE47	How will people summon help if staff are not there or immediately visible?	We are planning to provide a call alert device positioned at, or as close to, the entrance of the station that will alert a member of staff elsewhere at the station that assistance is required if they are not there.
TPE48	Will induction loop facilities be provided elsewhere on the station/concourse?	Induction loops are already installed at our stations to help customers with hearing impairments access PA announcements. They are mostly located on platforms near the customer information system equipment and in waiting rooms, and are clearly labelled. We have recently conducted a program of testing and repairs to this equipment to ensure that everything is in working order. We have identified that the positioning of the units and the equipment could be improved and we therefore plan to propose a pilot improvement scheme at Salybridge this financial year, as part of our accessibility minor works fund. Subject to the success of this pilot, we will make improvements across the

		rest of the TPE estate through accessibility improvement funds. To confirm, existing equipment is available and functional. Any future works will be a continuous improvement initiative and not a mitigation for our ticket office proposals.
TPE49	What mechanisms exist to monitor instances where assistance is not provided and to investigate why it happened?	Any complaints regarding failed assistance are investigated by our Contact Centre, the Accessibility Team, and local station management. Also, customers taking part in our post-trip survey who are unsatisfied with the service they receive are given the opportunity to have raise a complaint proactively at that point.

Issues relating to whether passengers can get the information they require to plan and make a journey, including during periods of disruption.		
Ref	Transport Focus Question	TPE Response
TPE50	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?	Currently, ticket office staff at 13 of our 16 stations carry out assistance and other duties in addition to their ticket office duties. However, the majority of staff time at these locations is spent in the ticket office, only coming out by exception when there is another duty to be carried out, or matter to attend to, on the wider station. Our proposal will mean staff are now located in the main areas of the station, which will naturally make them more present, visible and available to greater numbers of customers at the station rather than just customers who wish to purchase a ticket or go to the ticket office to ask for information.
TPE51	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?	Our revised plans will see our current staffing hours maintained at every station and staffing at sufficient and appropriate levels covering morning and evening peaks at all stations. Our current staffing levels at Manchester Airport, Hull, Huddersfield, Middlesbrough and Scarborough cover first and last trains throughout the week.
TPE52	How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?	Ancillary information will continue to be made available to customers at our locations on the same basis as today.
TPE53	What devices will staff have e.g. will they be able to print journey itineraries for passengers?	Colleagues will be issued with a personal smart phone and have access to a tablet device while on duty. These will empower staff with access to a range of information and apps at their fingertips, such as train running information, and booked assistance. We will retain the functionality for staff to print journey itineraries for customers on request.
TPE54	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?	Help points are available at every station and are in locations where they are most needed for general queries and emergency situations. At 10 stations there is a help point in the main concourse/ticket office area. Numbers of help point at each station are set out below:

		MIA – 4, SYB – 5, HUD – 5, DEW – 4, SBY – 4, BUH – 4, HUL – 6, MLT – 2, SEM – 2, SCA – 4, THI – 3, NTR – 5, YRM – 2, TBY – 3, MBR – 4, SCU – 2, BTB – 3, GMB – 4, CLE – 4
TPE55	What are the existing processes and SLAs for monitoring help points and the response time to repair faults? What future commitments can you give?	Monitoring of help points forms part of our service quality regime. The SLA for time taken to answer a call is 30 seconds. The rectification timescale for the repair of a fault is subject to the nature of the fault, however we have agreed with the hardware maintainer, that minor issues are to be resolved within 72 hours and for major faults to be resolved within 48 hours. All faults have to be rectified within 7 days.
TPE56	What are the expected standards for answering help points (i.e. within how many seconds)? What is the current performance?	As part of the current Service Quality Regime ('SQR'), we aim to answer all help point calls within 30 seconds. Our help point availability YTD is 76.73%. There are various reasons why a help point may not answered within expected standards. For example, if the help point is out of operation; if it is in operation but when the call was made it was faulty or the reception was poor; if the call was not answered within 30 seconds; or if the call was answered but it was inaudible or unclear. We have recently been experiencing some faults which relate to server issues affecting the quality of calls, which are currently being addressed.
TPE57	How will you monitor, and report time taken to answer help point calls / proportion not answered?	This is currently tracked through our Service Quality Regime where all facilities at a station including help points are subject to a regular inspection. In addition, we also monitor this through mystery shoppers who will check all facilities at the station including help points. Calls not answered by auditors are logged, after which point the condition of help points is checked.
TPE58	What are the standards for monitoring how quickly you respond to passengers using the emergency button?	Calls using the emergency button are answered within 30 seconds, the pressing of the emergency button prioritises this above any other help point calls.
TPE59	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?	We do not believe there will be an increase in calls via the help points with station staffing hours remaining unchanged. Our Customer Information Controller team, who accept the calls made via the help points, is sufficiently staffed to be able to cope with help point calls 24/7. There are two Customer Information Controllers on duty at any one time between the hours of 06:00 and 23:00. When a Customer Information Controller is not on shift, the Duty Customer Experience Manager will monitor this facility. Our Service Quality Regime also regularly inspects whether a help point call was answered within 30 seconds.

Issue relating to ensuring passengers are not penalised if they cannot buy the ticket they require from the station.

Ref	Transport Focus Question	TPE Response
TPE60	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?	We are not proposing to make any changes to our ticketless travel policy as it already covers for periods when station ticket offices are closed or travel from unstaffed stations where retailing facilities are not available. However, our on-line revenue protection pages will be reviewed and amended as required.
TPE61	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?	The National Rail Conditions of Travel currently states the following for visually impaired customers: "You will need to produce a document from a recognized institution such as Social Services, your Local Authority or Blind Veterans UK. Acceptable documentary evidence includes: CVI (Certificate of Visual Impairment); BP1 (Scotland), BD8 certificate for being blind or partially sighted; Local Authority registration card or letter for being blind or partially sighted. You will need to carry this documentary proof with you when making the journey". Wheelchair users are not required to produce any documents if they are remaining in their wheelchair for the journey. There will be no changes to these processes as part of this proposal.
TPE62	How will you review signage to avoid sending inconsistent messages about revenue protection?	TPE operates a regulated Penalty Fares scheme across its network (except Scotland). Along with other Penalty Fares operators we will review and (if necessary) make changes to station signage that will be consistent across all Penalty Fares operators.

Issues relating to whether passengers can continue to use facilities at a station.		
Ref	Transport Focus Question	TPE Response
TPE63	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?	Given we plan to retain our current station staffing levels, all customer facilities at our stations will continue to be made available to customers during the same times as they are today.
TPE64	How will it be ensured that station facilities are not subject to misuse or vandalism and will be maintained in good condition?	As today, we will monitor the condition of facilities at stations either by a member of staff being on duty, or via CCTV outside of staffing times. We will also continue to run our Service Quality Regime, which carries out regular inspections of all assets and facilities at our stations every period, and any failures are picked up for rectification. We will also continue to carry out mystery shops.
TPE65	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?	Currently, the alarms fitted in our accessible toilets are set up to alert staff at the station. As we plan to retain the current level of staffing hours, there will still be a member of staff at the station during the same hours as today to receive the alert.

Issues relating to whether passengers feel safe at the station		
Ref	Transport Focus Question	TPE Response
TPE66	Have you liaised with the British Transport Police about the impact on staff and passenger security?	Ensuring the safety and security of our staff and users of the railway are key priorities. As such, we have consulted our proposals with the C Division Superintendent of the BTP and our embedded BTP Officer. We are also undertaking a Crime and Vulnerability Risk Assessment with the BTP.
TPE67	Are any mitigations planned?	All our stations have been assessed against the Secure Station Scheme and already meet the relevant standards. CCTV will continue to be monitored 24/7 by our Control team. The security staff that we currently have in place for specific stations will remain in place. We will continue to work with Northern Rail and BTP in relation to the Real Ale Trail. We will continue to promote the BTP text service at all stations and on-board trains. We have automated announcements reminding customers of 'see it, say it, sorted'. We will continue to work closely with the BTP on security deployment across the network, in particular during events and in response to any issues of anti-social behaviour at stations. We will also continue to promote use of body-worn cameras by our station staff.
TPE68	Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?	All stations are currently covered with CCTV which is accessible live from Control and is monitored remotely 24/7. We are also in the process of upgrading our CCTV at stations to a new, feature-rich CCTV solution, which is a funded scheme which will take approximately 18 months to deliver. In the meantime, the current CCTV system is operable and will be maintained until the new system is installed.
TPE69	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?	At Stalybridge, the staff are located in the ticket office near the station entrance and are remote from the pub which is above at platform level. At Dewsbury, access to the pub does not require use of the station. We will be maintaining the existing security deployment on the Rail Ale Trail at the same level it is today. As outlined in our correspondence, we are now proposing no change to staffing hours at these stations.

Other Issues		
Ref	Transport Focus Question	TPE Response
TPE70	What assurances can be provided that the level of station staffing outlined in the proposal will be delivered and maintained in the future?	We currently have no plans to alter staffing beyond the current proposals. If in the future we felt it was appropriate to make any staffing changes, these would be undertaken in compliance with the legal and regulatory requirements as outlined below.

TPE71	Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?	Regulation exists to ensure continued provision of customer assistance. Train operators have a licence condition that mandates an Accessible Transport Policy (ATP) approved by Office of Road and Rail (ORR) which must meet required standards to ensure the accessibility of our services, including the provision of assistance for customers who book or wish to Turn Up And Go. Operators cannot make any changes to their ATPs without approval from ORR and when making changes 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. Furthermore, if an operator proposes a significant change, such as to staffing, the ORR's guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies (Transport Focus) by the ORR before any new or amended ATP is approved. More generally, operators also have legal equality and safety duties that would always be considered as part of any proposed changes to the operation of our stations, including the provision of staffing. We trust that this helps give Transport Focus and the wider public assurance that operators would need to satisfy existing regulatory and legal mechanisms should they wish to propose any future changes to station staffing.
TPE72	How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?	There are now no proposed changes to staffing hours. We will continue advertised planned station staffing times at the station, on our website and on the National Rail Enquiries website.
TPE73	How will compliance with any agreed new hours be monitored and reported?	Ticket office and general staffing hours will continue to be monitored and any non-delivery reviewed and reported internally. Staffing availability and helpfulness is also monitored via our Service Quality Regime, Mystery Shopper Programme, and internal Customer Satisfaction survey. Ticket office opening hours will continue to be reported externally in our Customer Report.
TPE74	What arrangements have been made to provide staff cover for things like sickness and holiday?	We have provided for General Purpose Relief as part of proposed staff rosters, which allows for cover for annual leave and staff sickness.
TPE75	What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?	Any mitigations or measures outlined within our proposals will form part of our operator implementation plan and will be delivered as part of the ticket office closure project. Our TVM upgrade to provide Advance Purchase products will be complete before any ticket office closure. As we plan to retain current staffing hours, there is no longer a need to provide mitigations related to reduced staffing cover, such as maintaining customer facilities.
TPE76	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?	TPE has clearly set out its plans and provided data and evidence to Transport Focus that these will enable customers to continue to enjoy widespread and easy access of rail products. TPE has increased the number of TVMs at its staffed stations by over 50% and will be completing upgrades to our TVMs by February 24 that will make 97% of products

		available on TVMs. TPE does not plan to close its ticket offices until this upgrade is completed. TPE will additionally be retaining the ability to retail unusual products that are not currently available through other channels. Products will also be widely available digitally, on board and through telesales. Customers will continue to be able to pay by cash either at a TVM or on board. As part of our operator implementation plan, we will ensure station signage and customer information is updated and welcome focal points are provided. Therefore, we do not believe there is any reason for Transport Focus to object to our proposals as there are no long lead or unfunded mitigations required. Our understanding is that Transport Focus has not objected to other ticket office closures in similar circumstances.
TPE77	Has any necessary funding / agreement been secured to implement any mitigations?	The key mitigation to enable our plans to close ticket offices is the TVM upgrade to retail advance purchase which is already funded. Any other costs of delivering this project, such as changes to signage, customer information and means to contact staff if they are not visible will form part of our operator implementation plan that will be submitted to DfT to secure approval to implement the proposals, subject to the outcome of this consultation.
TPE78	What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?	As outlined in the information provided to Transport Focus at the start of the consultation, we have confirmed to other operators that the services that TPE currently provides other operators at our staffed stations, such as dispatch or provision of onboard retailing equipment, are not affected by these proposals. As part of the TSA process, we have not received any objections to our proposals from other operators.
TPE79	Have any discussions been had with Network Rail about the impact at NR managed stations?	TPE does not operate any ticket offices at Network Rail managed stations.