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Wednesday 27 September 2023

### Transport Focus: Ticket offices - emerging issues and clarification questions

Dear Mike,

Thank you for your email of 6 September 2023 (Ticket offices - emerging issues and clarification questions) in response to our recent proposal to make changes to the operation of ticket offices on the c2c rail network.

As you know we have been authorised to commence TSA consultations within a range of parameters that we must comply with. At this moment our proposal to close ticket offices is not approved and we will continue to work with the Department for Transport, all passenger bodies and the industry through the consultation period to refine our proposals. We expect our proposal to be finalised after the consultation period has been concluded.

We very much appreciate your feedback and the supporting questions raised, all of which take into consideration the comments and concerns shared in the six hundred and eighty thousand consultation responses submitted to the Passenger Bodies by customers nationally within the potentially affected areas. We have worked with c2c's operations, diversity & inclusion, health & safety, customer service and ticketing teams to provide a detailed response to each of your questions and the areas requiring additional information, specifically relating to our proposal to close ticket offices. These can be found on the accompanying consultation question response document.

We would stress that in giving our responses to your questions we do so in good faith, based on the current proposals and best information available to us at this moment in time, all of which may be subject to change. All of our responses are subject to completion of the consultation process, final decision, compliance with c2c's National Rail Contract, funding availability and all relevant industry and statutory processes taking place.

Having listened to your feedback and, in light of comments raised since our initial proposal, c2c would like to confirm the following:

- **NO CURRENT STAFFED STATION WILL BECOME UNSTAFFED** We plan to retain our existing c2c ticket office staff who will be trained and redeployed as 'Floorwalkers'. It is not our intention to invoke compulsory redundancy and our experienced, knowledgeable multi-skilled ticket office staff will have the opportunity to further develop their roles and skillsets. They will become more visible and accessible to customers as they carry out their daily duties in and around the station concourse. This includes assisting those customers who need additional support, do not have access or do not wish to use digital ticketing.

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- **MORE TICKETING MACHINES** All c2c managed stations provide customers with access to at least one Ticket Vending Machine (TVM) which accepts cash, and we are in the process of installing an additional five machines at our busier stations. These machines are accessible to all customers and located either inside the station or under cover away from extreme weather conditions.
- **STATION FOCAL POINTS** In the event that a customer requires information and support – whether in relation to purchasing a ticket, planning a journey, or getting live service information – they will have access to a central ‘Welcome Point’. A ‘Welcome Point’ will be an initial focal point on entering a station that provides any customer who needs support and/or advice a place to start their journey. It would be a consistent and common location at c2c stations to offer reassurance to those who need it; a clear and obvious place to get help and support. This will be developed in collaboration with local, disability passenger user groups to ensure that it is fit for purpose and effective.
- **ACCESSIBLE FARES** We continue to work closely with industry partners to confirm the range of ticket products that may be impacted by the proposed ticket office closures. Mitigation may include improvements to the current TVM user experience, the digitisation of additional ticket types and changes to rail industry policy and processes. The overall mitigation is predicated on a ‘Digital First’ approach to ticketing which can be managed directly by customers online or through the award-winning c2c app. In relation to products that may not be immediately available at ticket vending machines, then customers requiring in-person assistance to purchase will be able to travel without a ticket and buy one at the next available opportunity, which will include buying from staff at our Customer Information Centres (which include the largest stations and our terminus Fenchurch Street). This process will be developed in conjunction with our revenue protection & security team and with British Transport Police.

We would like to emphasise that a critical element supporting c2c’s proposal is the extension of Contactless ‘CPAY’ payments (as part of the Project Oval extension) and the introduction e-ticketing across the entire c2c network later this year. We envisage that this will see current levels of Ticket Office administered ticket sales and the number of customer enquiries managed reduce. Based on our research and data analysis, we estimate that nearly half of all transactions currently made across c2c channels are eligible to switch to CPAY, a third are eligible to switch to an online booking and payment process, with less than a fifth remaining in the station. To put this in context, we anticipate that 4 out of 5 c2c customers will no longer be reliant on in-station retailing in order to purchase their travel tickets.

c2c fully recognises and supports the view of the Rail Minister that, given the current unsustainable subsidy levels, there is a real need for change in the way that station ticket offices and their staff operate and provide support to customers. We also share the Minister’s sentiments that “ticket office staff are underutilised” particularly during quieter times of the day and that “enabling ticket office staff to move from behind the screens into new multi-skilled roles providing additional face-to-face support to whom and where it is most needed, could be an opportunity to make better use of taxpayers’ money”.

c2c truly believes that the proposed closure of ticket offices, supported by the redeployment and repurposing of staff and the introduction of contactless and e-ticketing, will play a huge part in moving the rail industry to a more self-service, operationally efficient and financially viable future.

The changes we are proposing will make better use of ticket office staff time, improve engagement and interaction levels between station staff and customers, maintain and enhance existing high levels of customer service and support, while presenting a more visible, approachable and accessible c2c team. We will also undertake a process of safety validation to assure ourselves that changes will not adversely affect the safety risk profile, for both customers and staff, without suitable mitigation being put in place. We know from our passenger survey results that our customers feel safer and have greater confidence travelling on the route when staff are present and visible across the network. The deployment of more staff to station concourses and platforms will reinforce our commitment to passenger safety, highlighted by c2c recently attaining Safeguarding on Rail Accreditation".

c2c looks forward to continuing to work collaboratively with yourselves and other transport user groups, industry stakeholders and the industry to ensure we play our part in delivering the vision put forward by the Rail Minister. Following an incredibly tough few years for the industry against the backdrop of the global pandemic, reduced customer numbers and transformational changes to travel habits and behaviours, this proposal will not only help drive our industry forward but, more importantly, continue to provide our customers with an industry-leading sustainable, reliable and accessible rail network.

If you require any further detail or information relating to any of the responses provided in the accompanying 'c2c responses to clarification questions' document, then please do not hesitate to contact me or a member of my team.

We look forward to continuing to work with you during this consultation process.

Yours sincerely,

c2c

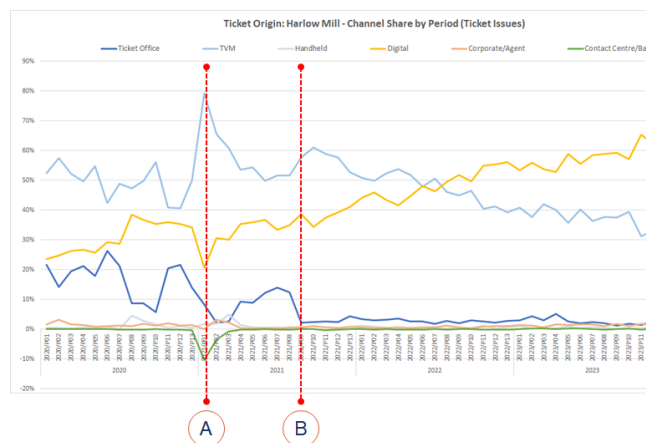
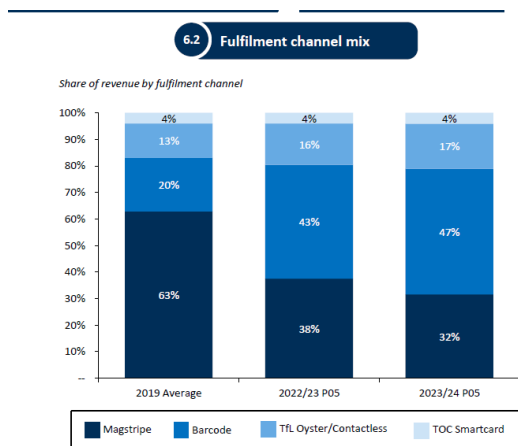
## c2c responses to clarification questions

### Easy and widespread availability of tickets

### Adequacy of retail facilities

Q. What assumptions have you made about how many / what proportion of people will move to digital if ticket offices are closed?

Overall, there has been a clear shift to digital channels over time across rail. This has accelerated through the pandemic period and continues today.



- Point A – Temporary Ticket Office Closure
- Point B – Full Ticket Office Closure

Evidence from previous Ticket Office closures, such as Harlow Mill, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed (typically a maximum of 20% increase in usage), this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing. Harlow Mill shows a 30% shift from closure to digital ticketing.

The extension of CPAY and enablement of Barcode ticketing on the c2c route will have a significant impact on c2c passengers moving to digital. Of today 85% of rail tickets are currently sold 'In Station' (50% at Ticket Vending Machines (TVM) and 35% Ticket Office Machines (TOM)). Based on our research and data analysis, we estimate the following channel shift across all our retailing channels:

- Nearly half of these ticket sales are eligible for CPAY
- A third are eligible to be purchased online to ITSO Smartcard or barcode
- A fifth will remain in station as cash users or magstripe users

Q. Do you have any existing programmes designed to help people migrate to digital and if so, how effective have these been?

The industry overall continues to develop and drive digital adoption, from the network-wide rollout of smartcards in 2018, through the more recent introduction of s-Ticket barcodes in early 2022 (which

c2c is in the processes of determining demand for this on our railway). For Railcards 3 out of 4 are now via digital fulfilment, which launched 5 years ago.

c2c has had an ongoing programme to support channel shift which has seen unattended channels increase from 45% of transactions in 2019 to around 65% now. During the same period, the proportion of c2c's earnings from ticket office sales has fallen from 40% to 25%. This programme has included investment in the user experience of TVMs, c2c website and app, supported by marketing activities specifically promoting the use of Smartcard and app. We will be launching a significant marketing and communications campaign later this year to promote the introduction of contactless PAYG, barcode ticketing and a simplified fares structure across the entire c2c network.

We anticipate a significant channel shift increase prior to the closure of ticket offices due to the imminent launch of contactless PAYG and barcode ticketing. Segmentation work carried out by c2c's digital team has revealed that 42.8% of transactions are by customers buying full-fare paper single & return tickets from c2c retailing channels with a credit card. Our marketing campaign plans includes:

- A dedicated marketing campaign is planned ahead of the implementation of contactless PAYG to tell customers it is coming! with live launch activity from 3 December.
- The main object of this initiative is to switch as many ticket office and TVM transactions (bought using a credit card) to contactless PAYG, with an ultimate long-term goal of 9 in 10 customers of this segment moving to contactless PAYG.
- The campaign will be running across the network, digital channels and on tightly geo-targeted digital advertising spaces in close proximity to our stations.

In a similar manner, the launch of barcode (e-tickets) provides another opportunity to prompt customers who currently buy discounted Railcard tickets at the ticket office to digital e-tickets. This 'railcard rider' segment comprises 28.5% of transactions at the ticket office and TVMs. Our marketing campaign objective is to switch these customers to e-tickets, and analysis from our digital team suggests we can move up to two thirds of these transactions to e-tickets over time. The campaign will run from the launch of e-ticketing on the c2c network on our owned channels.

By targeting those customers who spend time queuing at ticket machines and ticket offices, we will mitigate any impact from the closure of ticket offices by shifting customers online.

**Q. Have you made an assessment of who will not / cannot move to digital and the effect on them of closing the ticket office?**

Yes. Our Equality Impact Assessment (EIA) contains details of how certain user groups may be affected by a move to digital booking and payments. Staff will remain on hand to assist passengers with their ticket purchases, and it will still be possible for customers to pay using cash at all stations, either by using a TVM or one of our five Customer Information Centres.

**Q. How accessible is your app and your website, especially for those with a disability?**

The c2c website and app have been designed to be as accessible to the largest audience possible. It has been coded to comply with the World Wide Web Consortium (W3C) Web Accessibility Guidelines Priority Levels 1, 2 and 3 (Conformance Level "AA"). We continue to iteratively improve our digital products, testing all releases of our digital products and remain committed to maintaining its compliance with appropriate accessibility guidelines and serving the widest possible audience for our services.

**Q. Do you have any forecast of the impact on revenue – i.e. on how many people will no longer travel or will travel without paying as a result?**

This was an important consideration for c2c when creating our proposals. This point, coupled with other key factors such as maintaining accessibility, safety and security, drives our proposals. c2c's proposals are solely based around the redeployment of staff. There is no evidence to suggest that redeploying staff so that they are more accessible to customers would lead to a fall in revenue. It is generally accepted that the more highly visible and accessible staff are, the more revenue increases, and customer satisfaction rates improve. This is in line with Passenger Demand Forecasting Handbook principles.

Due to the confidential nature of commercially sensitive information, it is not possible to share actual numbers. However, we believe that by making staff more accessible to passengers at the stations and the with the introduction of concepts such as "Welcome Points" and continued improvement to services such as Passenger Assist and easier digital ticketing that we can encourage more people to use the railway on a more regular basis.

The cost of delivering an effective service is also a key consideration in light of the most recent National Rail Passenger Survey (NRPS) conclusions. The survey highlighted that the proportion of journeys rated as satisfactory by passengers regarding value for money for the price of their ticket nationally was 47%.

Any cost savings made through the redeployment of staff and closure of ticket offices will ensure better value for money for the tax payer and passengers.

In his letter to the Transport Select Committee, dated 11th September 2023, the Minister of State for Transport, Huw Merriman MP supports this view: "At present, I believe that ticket office staff are underutilised. Enabling ticket office staff to move from behind the screens into new multi-skilled roles providing additional face-to-face support to whom and where is most needed, could be an opportunity to make better use of taxpayers' money, given the current unsustainable subsidy levels"

We continue across the industry to explore alternative channels for ticket retailing, but working towards making all ticket types universally available on all channels is likely to drive up the costs of running the railway. Therefore, a strategic approach to this will represent better value for money.

**Q. What reassurance and evidence can you give that retail arrangements at each station will have sufficient capacity for the ticket sales displaced from the ticket office, especially at peak hours and at stations with a higher than average proportion of sales from the ticket office?**

Five additional TVMs are in the process of being added to the route at Basildon, Benfleet, Pitsea, Southend Central and Leigh on Sea. These are busy stations which, following detailed analysis, the business recognises the need to install extra units. Additionally, CPAY and barcode ticketing will provide a simple and easy way for customers to travel in the future relieving demand on all TVMs (as described earlier).

**Q. Has any assessment of the TVM capacity at each station has been carried out? This is both in terms of overall capacity and 'remaining' capacity – i.e. factoring in existing sales and Ticket on Departure collection per hour from the TVM?**

Yes. c2c carries out TVM capacity reviews with our supply chain. We also have live monitoring in place on each TVM across the route allowing us to quickly identify problems and send a member of staff or



an engineer to further investigate and resolve. We expect the reliance on TVM as a retail channel to decrease following the introduction of barcode and CPAY tickets.

**Q. What assessment have you made of the impact of seasonal peaks, especially at tourist destinations?**

We have a large number of customers that use our network for leisure and we see seasonal peaks heading towards the Essex coast in the summer and towards London stations. We flex our resources to where needed for events and seasonal weather, developing bespoke plans for events and seasonal staffing increases to welcome customers, for example at Southend Central we see large increase in passengers requiring mobility assistance and provide extra staff to ensure we offer the best service possible. We will continue to do this through our internal events and seasonal working groups.

**Q. Has any assessment of the location of TVMs been carried out – are they in the right place to meet demand?**

Every station has at least one cash TVM and in most cases additional card TVMs. The cash TVM is always available at stations where some concourses are closed at off peak travel times meaning cash is always available as a payment method.

**Q. 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 devices to sell tickets directly?**

We intend to give all of our frontline colleagues training on assisting customers choose the best ticket for them and they will be instrumental in driving customers to use CPAY and barcoded tickets when launched across our route, this training is scheduled to start in early November 2023. Our people are concourse based, and will talk to our customers and help them choose what’s right for them. This will include in the initial phases, including additional staff to help to channel shift quickly to other fulfilment methods. We are aiming that the majority of our customers move to self-fulfilment through our app, smartcard, CPAY, barcode and TVM’s all with the support of our well-trained teams who will be there to assist, as we transition to our new ways of working we intend to deploy our Revenue Protection staff to assist at stations where migration to other retailing channels is slower. This will allow us to provide bespoke assistance to customers that require support.

We will through this process, of course, monitor queuing times at busier stations to ensure that we can help customers get through the station as quickly as possible.

**Q. We are aware that staff at ‘hub’ stations will still have access to ticket office equipment/functionality. How will this work – is it a case of the ticket windows still being staffed, or will they just be opened to queue bust? Will they be available at weekends or just Monday-Friday?**

Our intention at the Customer Information Centres will be to assist customers with a ‘floorwalking’ member of staff who will determine the best ticket buying option for customers as a preference to move them to smart, the use of c-pay or purchasing at TVM’s. 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.

**Q. How will the adequacy of retail arrangements at stations be monitored and reported (including to passengers)? What KPIs will be in place?**

It’s our intention to develop a dashboard that our customer teams will have access to provide real-time retail data, details of completed sales and system status statistics. KPIs are in place with suppliers

responsible for maintaining and ensuring retailing machines and systems are available. We will be developing further proposals to have a customer control centre where we monitor in real-time our systems, and provide a mitigation for any reactive issues that affect customers.

**Q. What impact is there on impartial retail obligations – something that currently applies to ticket offices. Will similar obligations be put onto other channels?**

There will be no impact on impartial retail obligations, our people will continue to be trained and competent to ensure our customers get the right ticket for their needs. Staff will, as today, be on hand to assist customers select the correct fare for their journey. The TVM user interface is specifically designed to guide customers towards the cheapest/best suited fare based on the information provided.



## *Usability, functionality and accessibility of Ticket Vending Machines (TVMs)*

### *Q. Are there any other tickets, not mentioned in the list above, that would not be sold by the TVM?*

Not all products and services are required at all locations either due to demand or applicability. We can confirm the range of products that we are considering across industry as those which could be impacted by the ticket office closures and which, based on our understanding of current demand levels and most important, for example, for accessibility purposes.

Industry is also taking into account the time for TVM development and relevant costings to help prioritise the need for alternative retail channels.

See annex A for a list of retail mitigations/enhancements for further information. Since 2020 c2c have enabled Senior Rovers, Boundary Zone, and Canvey Card Fares across all its retailing channels to ensure customers can purchase the correct ticket which was only available at Ticket Offices.

Should a customer not be able to buy the correct ticket at the station, the customer is able to board the train (in line with current National Rail Conditions of Travel – NRCOT) and purchase at the first available opportunity.

### *Q. Do you have any plans to upgrade TVM functionality and if so, what would this cover and when would it be complete?*

Yes. Most of the approaches for enhancements to our TVM requires engagement with the TVM supplier and a development activity for c2c's Ticket Issuing System (TIS). Initial estimates for the development time required for specific products has been set out (see annex A).

In most cases these changes are not planned to be completed in 2024, however a number of interim mitigations are proposed to ensure passengers are not disadvantaged. Final plans will be dependent on funding agreements and supplier contracts.

### *Q. Will staff be able to access the original ticket office machine or have a 'staff mode' option on a TVM or be issued with handheld machines to sell tickets not available from the TVM?*

Subject to approval, our intention is that c2c will be retaining five ticket offices. These will incorporate the existing ticket office machine and be able to retail the same tickets customers can purchase today, only after prioritising digital first methods and in the small number of cases where a customer requires a product from the ticket office, our staff will have ready access to complete that transaction for customers. c2c is investigating whether staff will have access to the TVM 'staff mode' option, and if funding is available and meets the requirements of c2c then this will be made available to staff. We do not have plans to provide our staff with mobile ticketing machines, their role will be to guide our customers to other fulfilment methods.

### *Q. How will passengers access these products and services in future?*

We have set out [in annex A] the intentions for the retailing of different products. The industry has already identified that 99% of products by demand sold at ticket offices today can be obtained from a TVM or online.

Where time is required to implement changes due to TVM upgrades or other process changes, to facilitate earlier implementation of the proposals, interim solutions may be necessary and follow a standard hierarchy of mitigation:

1. Direct online (website or App) - Remote from station.
2. Customer Information Centre - At station.

The overall mitigation approach is predicated on a 'Digital First' approach to ticketing, with the promotion and use of digital ticketing and services as the primary retail channel. We do recognise however that a number of our passengers are digitally excluded, and for them, we have ensured the other channels as set out in the hierarchy are available.

Many interim solutions are dependent on confirmation of TVM functionality and availability where staff are available. In the very small number of cases that a customer is not able to buy the product at their origin station via these mechanisms, we are ensuring that the customer is able to board the train and buy on the train or at their destination. This is based on the pre-existing conditions of travel.

**Q. How can passengers have confidence that this is not a precursor to withdrawing some of these products - for example, rover tickets.**

At this time, we are not looking to withdraw any products. We may be simplifying processes, such as removing photocard requirements for season tickets, but withdrawal of products would require a full and formal review of the ticketing and fares system. This is not within the remit of this consultation or these proposals.

**Q. How will passengers pay for car parking in future? Is there a payment option available at the station?**

There is no change for c2c. Car parking on the c2c route is payable at NCP operated machines or their own alternative channels. It is not currently available at the ticket office.

**Q. Will stations that retain ticket office functionality be able to retail all products and services that can currently be sold or accessed?**

Yes, the ticket office retailing capabilities at the Customer Information Centres will remain unchanged.

**Q. How will someone who cannot use a TVM, for example a disabled person, purchase a ticket?**

Currently, in the event of the station being unstaffed the help point will be available for the customer to use, as it is today. Wayfinding will be implemented near the welcome point so the customers can locate them easier.

The industry has set out its intention to ensure no passenger is left behind as a result of the proposed changes. Specific requirements vary by an individual's disability, and we are working with our suppliers to ensure that TVMs are as accessible as reasonably possible.

We are proposing that our stations will have a clearly identified 'Welcome Point'. A 'Welcome Point' would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a 'Welcome Point' will be considered across all types of stations following the consultation process.

Where the station is changing from a Regulated Station and the Ticket Office is to close, 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. The primary role of the Welcome Point is to offer support and guidance to customer to use the station facilities, such as TVMs and help passengers with their online ticket purchases. Out of staffed hours these locations could also offer access to a 'Help Point' and additional guidance and information.

These 'Welcome Points' should be clearly accessible / visible and close to any ticket retailing facilities where appropriate. Where a customer with disabilities is unable to use a TVM and is not traveling with a companion, the 'Welcome Point' will be a place to start their journey, seek assistance with buying tickets including use of a TVM, as necessary.

**Q. 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)?**

Our staff are predominately concourse based and will still be available for customers, additionally for locations where a member of staff is not immediately available, we currently have 69 help-points across our route of 26 stations and provide access to someone 24 hours a day. Where we need to upgrade and install additional help-points we will do that as part of our normal business processes, as we do today. We are also reviewing our maintenance plans and back-office facilities to ensure that our help-point systems have near 100% availability.

**Q. Is it proposed to upgrade TVMs to offer remote access/video help facilities?**

No. It is highly unlikely that such assistance would be made available across our TVMs due to difficulty and very high costs of infrastructure installation. The need for high bandwidth, both upload and download to support a reliable service means that it is not currently possible at many stations. The installation of the infrastructure across the network to support such services would be prohibitively costly.

However, we are proposing that our stations will have a clearly identified 'Welcome Point'. A 'Welcome Point' would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. Staff would be available from the Welcome Point to assist with TVM transactions during the staffed hours.

**Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability (i.e., are passengers protected from the weather when queuing, are they hard to see in sunlight)? Do you have any plans to relocate TVMs?**

We have taken steps to ensure TVMs are in the right location at stations, both in terms of being where the customer needs them and being useable throughout all weather types. It became apparent that touch screen functionality of TVMs located outside is negatively affected by rain, and as a result we are underground a program to relocate those TVMs to inside spaces which are protected from the elements and are more conducive to a positive customer experience. c2c have also procured five additional TVMs which will be stationed at key locations across the route which will help reduce queue times during busy periods.

Our TVMs are designed with a particular focus on the height at which each of the peripherals are located in order to be usable by wheelchair users. Sigma, our TVM supplier, states that 'touch requiring parts' of the machines are all located at a height of between 700 and 1200m height from the ground.

Q. We are aware that some groups of disabled passengers are more likely to use cash when purchasing tickets. Are 'cash TVMs' at accessible (step-free) locations in the station?

Every c2c station offers at least one TVM which accepts cash payments. These are located in areas of the station which are accessible at all times (i.e. not located at entrances/exits which close during service).

Q. What are the contractual SLAs for fixing out of order TVMs and have these been reviewed given the future importance of TVMs? For example, in relation to replenishing consumables, i.e., ticket stock and ink, and repairs to faults.

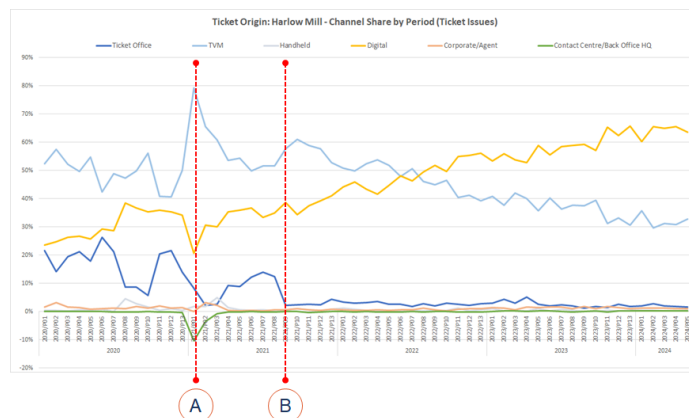
The replenishment of ticket stock and receipt paper is carried out by ticket office staff. This will carry on under the proposal by members of station staff. The process for repairing out of order TVMs by third party engineers will not change from the current arrangement. We have an existing service level agreement (SLA) with our TVM and TIS suppliers which is regularly reviewed to ensure standards are maintained.

Q. Will there be standards for maximum queuing times at TVMs and how will queue lengths be monitored?

Where we propose a station is changing from a Regulated Station and the Ticket Office is to close, we will continue to use reasonable endeavours to ensure that no-one has to queue at to purchase a rail product for more than five minutes during times of peak demand or for more than three minutes at any other time (or any shorter period(s) specified in the Passenger's Charter). This will stay in line with the current provisions of the TSA for Regulated Stations.

It is possible that there may be longer queues in the immediate period following implementation, particularly at larger stations. However, there is no intention at this time to introduce new set standards for queue times. This is because of our targeted active promotion of online purchasing and multi-skilled station staff who will be trained to assist our customers to shift to other retailing channels. In interim phases of the implementation plan we may use our Revenue Protection teams who have access to existing mobile/handheld devices available to help those passengers who do not, or cannot, switch. We are therefore not expecting TVMs to need to meet the same demand as ticket offices currently, even during peak periods.

Evidence from previous Ticket Office closures, such as Harlow Mill, supports that while there is an initial spike of increase in TVM usage at a location where the Ticket Office closed (typically a maximum of 20% increase in usage), this quickly returns to pre-closure levels before showing a continued decline in usage as more customers move to digital ticketing.



- Point A – Temporary Ticket Office Closure
- Point B – Full Ticket Office Closure

We will review progress at suitable milestones and will address any identified issues as part of our regular customer satisfaction surveys.

## *Availability of staff to provide retail advice and help*

### **Q. Why are retail staffing hours being reduced at some stations – i.e., what rationale was used?**

Through the consultation process we have listened to feedback and have made amendments to station hours where we had previously planned increasing our mobile team.

The initial proposal assessed individual station profiles. That assessment led c2c to propose revised hours based on footfall, type of transactions and security rating. At some stations this has increased floor walking hours and in some stations this has decreased hours. Our proposal carefully balances customer requirements and business priorities.

All c2c stations were reviewed based on the individual number of ticket sales/transactions they process, station National Rail Security Programme (NRSP) categorisation, passenger footfall (2019-2020) and reported crime statistics.

Revised station presence can be found in Annex A.

### **Q. 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?**

Our work and research into this area indicates that our proposed staffing levels at stations are sufficient to ensure customer assistance with ticket purchases (and other duties) can still be offered at the busiest of times.

### **Q. How do you intend to brand 'hub' stations, so passengers understand their role as a ticket office?**

We will ensure that at stations where a ticket office is retained that it's clear to customers the function of the office. We intend to our staff to direct customers at these locations to shift to smart, c-pay, barcoded and TVM's as a preference to using the office. This includes a combination of staff in high visibility uniforms, positioning of staff close to the entrance to guide passengers to buy the right ticket and vinyls on closed windows advising customers of the best method of ticket purchase.

### **Q. 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? Will this replicate the training given to existing ticket office staff?**

Our teams at c2c are already multi-functional and have a high level of training to support our customers. In advance of the upcoming CPAY and barcode ticketing introduction we have a training course planned for all staff, including those who do not do ticket selling as part of their role. We think that training our people to be prepared for any new ways of working and supporting customer is essential and we are working on developing even stronger competence frameworks to ensure our people can be knowledgeable and available for our customers. We will also provide ticket recognition training to our agency colleagues to ensure that they can assist our customers.

### **Q. 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 proposing that our stations will have a clearly identified 'Welcome Point'. A 'Welcome Point' would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations

to offer reassurance to those who need it; a clear and obvious place to get help and support. The concept of a 'Welcome Point' will be considered across all types of stations following the consultation process:

Where the station is changing from a Regulated Station and the Ticket Office is to close, the Welcome Point would be a clearly signed location within the station. During staffed hours this location would have a member/members of staff nearby to offer advice and support. We expect the number of passengers that can be supported at any one time will mirror the number of staff available. The primary role of the Welcome Point is to offer support and guidance to customer to use the station facilities, such as TVMs.

Out of staffed hours these locations could also offer access to a 'Help Point' and additional guidance and information.

These 'Welcome Points' should be clearly accessible / visible from the station entrance and close to any ticket retailing facilities where appropriate.

**Q. 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?**

We agree rosters with our staff in advance of any changes to ensure that we can meet our staffing requirements, once these are agreed we resource those locations through a combination of local staff, rotational staff (staff who work at multiple locations) and agency staffing. We track our compliance with schedule 17 and will use this at regulated stations to ensure that we comply with our obligations.



## *Paying by Cash*

**Q. Have you made any specific assessment of the ability of TVMs to cope with the increase in cash, especially at stations where there is a higher than average use of cash to purchase tickets?**

Every c2c station offers at least one TVM which accepts cash payments. These are located in areas of the station which are accessible at all times (i.e. not located at entrances/exits which close during service). As a business we are working with our suppliers as to the feasibility of upgrading card only TVMs so they can also accept cash. For reference our data shows that currently c. 8% of TVM transactions are cash and 14% of TOM transactions are cash. We are confident that TVM will be able to support the transfer of this percentage along with a shift to other channels such as smart card and contactless.

Cash collection from TVMs will continue as they do today. c2c has remote monitoring tools for TVMs so we can clearly see when TVMs are full and due for cash collection, and we can request this on an ad hoc basis if required.

**Q. If a person cannot pay by cash at the station what arrangements will exist to enable them to travel? And will there be clear signage at the station to inform passengers about this?**

The intention is to ensure that customers can continue to pay for tickets in cash. This will include cash acceptance at TVMs (where possible) and at our Customer Information Centres.

Until then, NRCoT 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.

**Q. How will passengers with cash be able to buy the products listed above in relation to TVMs?**

All c2c stations have a TVM which accepts cash. The additional TVMs which are being installed across the route will also accept cash. We are undergoing a study to assess the feasibility of upgrading card only TVMs in order for them to accept cash. TVMs are remotely monitored, and the business will be able to identify where either a TVM is in need of a cash 'top up' or a cash collection.

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

**Q. 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?**

Staff will be based on the station concourse under the proposals where they are as opposed to behind the ticket office window as at present. This will mean they are best placed to assist customers.

At busy times at present there may be a small queue as customers wait for assistance and this may occur under the proposals. Staffing levels have been allocated to ensure busier stations have more staff available at peak hours so that we can continue to provide the best possible service to customers.

**Q. What assurances can you provide that staff will not be pulled away to other duties rather than providing assistance?**

In our stations, today and in the future, we prioritise assistance for customers with disabilities - this will always be the first task we will ask our people to deliver. Our teams work in busy environments, and we give them tools to be able to prioritise their work and ensure that prioritisation is weighed in favour of assisting customers before all.

**Q. How will staff at the station know if passengers need help to board?**

This will be as present; our staff are made aware of those who have booked assistance and make themselves available. For turn up and go bookings at stations where there is no staff member of duty, as today, customers can use help—points to summon assistance as per the requirements of our Accessible Travel Policy. We always try to provide assistance as soon as reasonably possible.

**Q. When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?**

Turn Up and Go assistance for customers with disabilities will remain the same. The Passenger Assist service is a network-wide service that is available for pre-booked and walk-up customer to receive assistance. This is supported by c2c's Accessible Travel Policy that sets out the commitments to ensure an accessible railway for all passengers, including for Turn Up and Go. 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. Station staff, mobile security teams, or staff from neighbouring stations will be deployed to assist. Our Service Delivery Centre (SDC) will decide if there is a mobile team nearby to assist. In the unlikely event that nobody is available to assist we will look at getting the customer a taxi to the next staffed station. Staff may have to finish other duties first, but we will always try to provide assistance as soon as reasonably possible.

In his letter to the Transport Select Committee dated 11th September 2023, the Minister of State for Transport, Huw Merriman MP has publicly stated his position on station staffing which demonstrate the intent: "I have been clear that no currently staffed station will become unstaffed as a result of industry changes, and operators should ensure that staff are well located within the station as needed to meet passenger needs in future. This includes ensuring that staff are available to assist those who need additional support or do not wish to use digital tickets."

A revised station presence table for c2c stations is attached in annex B.

Q. If this is reliant on onboard staff 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?

c2c has driver-only operated trains. We will have no reliance on onboard staff to provide assistance as is the case today. Customers should at a station where extra assistance is required, use the station help-points to indicate intention to travel and we will in accordance with our Assisted Travel Plan provide assistance.

Q. If the mitigation is a mobile team how long will people have to wait? If you currently use mobile teams to provide assistance, do you have any evidence on their effectiveness (e.g., time taken to arrive, passenger satisfaction)

We do not propose to change the existing support arrangements and will maintain the current service levels. In the event that assistance has not been pre booked, staff may have to finish other duties first, but we will always try to provide assistance as soon as reasonably possible.

Q. 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? i.e., how easy is it to source accessible taxis and how reliable are they.

Taxis will only be used in cases where we are unable to assist customers on to one of our trains – this is a very rare occurrence currently and we do not expect our proposals to increase the likelihood of passengers requiring travelling by taxi. In the cases we require assistance via accessible taxi, we use established and reputable local firms.

Q. How will people summon help if staff are not there?

Customers should at a station where extra assistance is required, use the station help-points.

Q. Which of your stations do not have tactile paving fitted along the entire length of each platform face – the need for this is increased if the station is to have no or less staff in future? If not, which stations do not have this? What additional mitigations can be taken to ensure the safety of visually impaired passengers?

Nearly all c2c station and platforms have tactile paving with two locations – Chafford Hundred and Pitsea engineering bay platform (not passenger operational) - these are due to be completed by December 2023 as part of the Eden Park recommendations.

Q. How will the focal point of the ticket office/ window be replicated?

We are proposing that our stations will have a clearly identified 'Welcome Point'. A 'Welcome Point' would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey. It would be a consistent and common location at stations to offer reassurance to those who need it; a clear and obvious place to get help and support.

**Q. Will induction loop facilities be provided elsewhere on the station/concourse?**

Induction loop facilities are available at all our stations already in accessible parts of our stations and concourses.

**Q. What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?**

We have strong business processes in place to ensure that we track, monitor and support all assistance journeys on our network - 98% of all assistance journeys are met. We investigate any assistance failures and ensure that embed learnings back into our training to ensure continuous improvement. We are working additionally to adopt the Passenger Assistance app across our teams and strengthen our control room management to improve the journeys for those with disabilities.

**Q. How will ancillary information traditionally displayed in the ticket office be provided e.g. timetable leaflets, local travel information, local bus timetables etc?**

We are proposing that our stations will have a clearly identified 'Welcome Point'. A 'Welcome Point' would be an initial focal point on entering a station that provides any customer who needs support and / or advice a place to start their journey.

We will, of course, continue as we do today to provide information traditionally displayed in the ticket office, including timetable leaflets, accessible travel policies, local travel information, local bus timetables at the 'Welcome Point'. The concept of a 'Welcome Point' will be considered across all types of stations following the consultation process.

Every station would have a visible standardized template poster at appropriate location(s) that clearly states:

- What ticket buying facilities and payment methods are available
- What online facilities can be accessed to buy a ticket there and then on a mobile device
- What is expected of them (depending on whether the station is/is not in a Penalty Fares area and/or whether tickets are sold on train) – reinforcing the buy before you board at all relevant locations
- Where they can find help (staff/help point/phone number. etc)

**Q. What devices will staff have? How will staff be able to give people journey itineraries and other printed info?**

All of our frontline teams have access to a mobile device so that they can provide information to passengers, they will continue to have access to our station PC's and printers and are encouraged to print out itineraries for customers who require them – our customers often ask for written directions or itineraries and pen and paper is, as always, available for our teams.

**Q. Are help points at every station and are they in an accessible location? Are there any plans to position help points in concourse areas near ticket offices to avoid having to walk along platforms or over bridges to summon help?**

We currently have 69 help-points across our route of 26 stations and provide access to someone 24 hours a day. Where we need to upgrade and install additional help-points we will do that as part of

our normal business processes, as we do today. We are also reviewing our maintenance plans and back-office facilities to ensure that our help-point systems have near 100% availability.

**Q. What are your existing processes and SLAs for monitoring that help points are working, how quickly calls are answered and the response time to faults? What future commitments can you give?**

All our help-points are checked and monitored daily to ensure that they are available for our customers. We have a robust maintenance process to ensure that our help-points are near 100% availability. This also forms part of our service quality regime.

**Q. What are the standards for monitoring how quickly you respond to passengers using the emergency button?**

On our help points there are two options for customer to choose. Emergency call buttons are directed to 999 emergency services. c2c will monitor how calls for information increase as a result of these changes and make necessary changes through business as usual activities.

**Q. How will you monitor/report time taken to answer help point calls / proportion not answered?**

We will look to, over the next 12 months, introduce a process to monitor time taken to answer help-points. Subject to technical feasibility.

**Q. 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?**

Help point calls are answered through the c2c service delivery centre which has enough staff to manage current call volume. c2c will monitor how calls increase as a result of these changes and make necessary changes through business as usual activities.

**Q. Is it clear how a disabled passenger would use the help-point when seeking assistance to board - e.g. would they press the information button or are they, as with some train companies, expected to press the emergency button to receive more immediate assistance?**

There is no change to current process as is today. We would advise passengers to use the information button to request assistance and c2c would prioritise accordingly.

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

**Q. 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 currently 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.

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 will be issued to allow travel to another station to purchase their product. This should 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)

**Q. 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?**

All staff training will be comprehensive and include customer service, accessibility awareness, and expertise in navigating complex travel scenarios, enabling staff to better assist passengers with diverse needs and queries.

In some cases, such as for the purchase of specific fares, evidence may be required, as it is today at ticket offices, to validate their entitlement. This is currently the case for access to Special Disable Fares from Ticket Offices and the same policy will be continued for other retail channels where that fare is available.

**Q. How will you review signage to avoid sending inconsistent messages about revenue protection?**

As part of the implementation planning for Ticket Office closures, we will ensure that all notices and signage within our 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.

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

Q. What mitigations are planned for West Horndon and Laindon??

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 our facilities as part of this plan.

Q. Can you confirm, for the other stations, that all station facilities that are currently provided during ticket office opening hours will remain open during those hours?

There will be no changes to the opening times of our facilities as part of this plan.

Q. We understand that alarms for 'disabled' toilets are often located in ticket offices. Is this the case and, if so, where will these be moved to?

The stations impacted by this was identified in our EQIA and it impacts the majority. The exact location where alarms will be moved will be determined during the next phase of the programme. This will be subject to funding and internal design processes.



## *Questions relating to whether passengers feel safe at the station*

**Q. Have you liaised with the British Transport Police about the impact on staff and passenger security?**

Safety and security is a key priority for each Train Operating Company which has regular engagement with the British Transport Police to understand any safety and security trends on their network.

In addition to this, the Department for Transport (DfT) and British Transport Police (BTP) have agreed that Operators should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals once discussions with the Passenger Bodies have been finalised. This assessment was produced by DfT in collaboration with the BTP for TOCs to complete for each station and will form part of the decision-making process before any ticket office is closed.

**Q. Are any mitigations planned?**

Currently, existing security resource is analysed and deployed through collaboration with the British Transport Police. Mitigations need to be worked up following completion of the Crime and Vulnerability Risk Assessments.

**Q. Is CCTV coverage adequate, is it accessible 'live' from control and is there resource to monitor it remotely when required?**

Yes. c2c has a CCTV monitoring suite staffed 24/7, across all days of c2c train services.

## Other Issues

### Future change

**Q. What assurances can be provided that the level of station staffing outlined in the proposal is delivered and maintained in the future?**

With the removal of stations from Schedule 17 of the TSA, the regulation on Ticket Office staffing and services will be removed. The intention going forward would not be to replicate the historical regulation of station staffing hours but should protect those customers most in need of in-person support and assistance. Therefore, to mitigate the concern that this will erode customer protections from future changes, it has been recommended that additional commitments on station staffing levels be linked to TOC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP).

The ATP already offers better provision for the protection of passenger access to necessary and reasonable support at the station than is contained under the TSA. Unlike the TSA, the ATP is formally regulated and enforceable by the ORR as part of an operator's licence. It covers a range of scenarios to commit TOCs to providing support at stations, the most relevant of which are detailed at Appendix C to this document.

Changes to the ATP are controlled, with the agreement of any new ATP, or change to an existing ATP, to include the provision for involvement of stakeholders regarding the ATP provisions at a local station: "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."

The ORR guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies by the ORR before any new or amended ATP is approved.

Operators may also choose to consult other stakeholders on their draft but ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC) (or Mobility and Access Committee for Scotland - MACS, as relevant for operators serving locations in Scotland), Transport Focus and (where relevant) London TravelWatch on the draft Accessible Travel Policy documents during the approval process and collate a single set of comments to feed back to the operator."

Furthermore, the ORR guidance states that each TOC must publish ATP on their website and via hard copy at staffed stations, and the ATP must be provided to the ORR, DPTAC and Passenger Bodies.

**Q. Can commitments be made that a fixed, advertised staff presence will not subsequently be removed without further passenger consultation?**

At present, ticket office opening hours for individual stations are stipulated in Schedule 17 of the Ticketing and Settlement Agreement (TSA). The TSA is an agreement between operators that is a condition of an operator's service contract. Whilst the TSA makes provisions for determining ticket office hours, this does not directly protect staffing levels or cover the hours of station staffing more widely.

The TSA was brought into use in July 1995 following the introduction of operator franchises. At that time the predominate retail channel for rail tickets was via in-person retail at stations – Ticket Offices. Since then, ticket retailing has seen a fundamental shift to digital ticketing and more automated retail,

with industry figures now showing that only c. 12% of tickets are now bought in-person at a Ticket Office. The protection to customers' ability to purchase tickets locally provided by the TSA is no longer as relevant given that the majority of customer now purchase online, via an App or at TVMs at stations.

The expansion of Pay As You Go (PAYG) schemes including contactless and account-based payment will further erode the requirement for in-person ticket retail.

However, a significant minority of customers, as highlighted by the initial feedback from the consultation exercise, do require assistance when travelling, either to access the services or to understand and purchase the right ticket for their journey. This represents a shift away from the broad Ticket Office sales provision originally intended to be protected by the TSA to a more targeted support at station for those who require assistance.

Given that shift, the regulation required to protect the services should also be fit for purpose. With the removal of stations from Schedule 17 of the TSA, the regulation on Ticket Office staffing and services will be removed. Any future regulation should not replicate the historical Regulated Station approach of the TSA but should protect those customers most in need of in-person support and assistance. Therefore, to mitigate the concern that this will erode customer protections from future changes, it recommended that additional commitments on station staffing levels be linked to TOC policy on supporting accessible travel. The most appropriate mechanism to achieve this is via the Assisted Travel Policy (ATP).

The ATP already offers better provision for the protection of passenger access to necessary and reasonable support at the station than is contained under the TSA. Unlike the TSA, the ATP is formally regulated and enforceable by the ORR as part of an operator's licence. It covers a range of scenarios to commit TOCs to providing support at stations.

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The ORR guidance also covers broader consultation requirements that will be undertaken, including consultation of the Passenger Bodies by the ORR before any new or amended ATP is approved. Operators may also choose to consult other stakeholders on their draft but ORR will formally consult with the Disabled Persons Transport Advisory Committee (DPTAC) (or Mobility and Access Committee for Scotland - MACS, as relevant for operators serving locations in Scotland), Transport Focus and (where relevant) London TravelWatch on the draft Accessible Travel Policy documents during the approval process and collate a single set of comments to feed back to the operator."

Furthermore, the ORR guidance states that each TOC must publish ATP on their website and via hard copy at staffed stations, and the ATP must be provided to the ORR, DPTAC and Passenger Bodies.

**Q. How would any new staffing arrangements be advertised to passengers (in a similar manner to the way ticket office opening times are advertised)?**

As is the case today, staffing hours and arrangements are advertised, for example on our websites and wider industry sites.

c2c has a Passenger's Charter, which is a published guide to the level of service passengers can expect to receive when using their stations and train services. The charter is reviewed annually, including engagement with the Passenger Bodies (Transport Focus and London TravelWatch) and includes a description of all aspects of the expected services a passenger should expect, including purchase of tickets and support at stations.

The production of the charter is a requirement for each operator under their contract with the DfT. It should provide a simple and clear description of the expected services. The Charter ensures that each operator will continue to communicate the services and availability of those services at stations that are no longer Regulated Stations under Schedule 17, as it does today.

**Q. How will compliance with any agreed new hours be monitored and reported?**

This is something that needs to be agreed across industry.

**Q. What arrangements have been made to provide staff cover for things like sickness and holiday?**

We have robust monitoring of our staffing requirements by our dedicated resourcing teams. We have agreed rosters with our staff and use rotational staff to cover planned gaps in rosters. For short-term resourcing issues our teams have access to additional staff through overtime and agency staffing, as is the case today.

### *Timing of mitigations*

**Q. What guarantees can you offer that any mitigations proposed will be implemented before the implementation of a ticket office change?**

In many instances, we expect there will be two stages of mitigation. The "Day 1" 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 1" 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.

**Q. 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?**

We understand the concern about the timing of mitigations and when best to change staffing arrangements. There is a significant wealth of experience in East London and South Essex regarding the popularity and impact of introducing pay-as-you-go "touch and go" ticketing. The station staffing operating model proposed by c2c has already been proven in East London, by operators such as London Overground on the Gospel Oak to Barking Riverside Line. This directly relevant experience creates a strong body of evidence to suggest that the mitigations being proposed (i.e. Oval, TVMs, plus floor walking and security staff) are attractive to customers, easy to use and adequate.

Ideally Oval and redeployment of TO staff would occur concurrently, in order to maximise the assistance that can be given to customers during the transition. But it is certainly the case that any objection by Transport Focus will delay c2c's ability to redeploy staff to provide assistance where it will be most needed.

There is no reason that Transport Focus should object to any of these proposals as prior to a longer-term solution being implemented, there will be an appropriate Day 1 mitigation in place which will fully mitigate any issues.

These short-term mitigations will allow for passengers to buy their tickets in a different way than they do today, either at their origin station, along their route or at their destination, in line with our pledge that passengers will never have to travel out of their way to buy tickets.

**Q. Has any necessary funding / agreement been secured to implement any mitigations?**

The Rail Delivery Group has agreed in principle with the Department for Transport that funding support for the Retail Enhancements will be available, but the release of this funding will obviously be subject to the conclusion of the consultation process and the ticket office closure plan going ahead.

In his letter to the Chair of the Transport Select Committee, dated 11 September 2023, the Minister of State for Transport, Huw Merriman MP, has confirmed that no final decisions will be made until after the consultations have been concluded. He states,

“When authorising Operators to commence TSA consultations, the Department set out at range of parameters with which an Operator's proposal must comply. Operators then took action to consult on ticket office changes in line with the rail industry's Ticketing and Settlement Agreement (TSA). The Department has not approved any proposal put forward by an Operator and will not do so until consultations are concluded.”

The letter also clarifies the Minister's expectations that Train Operating Companies will be refining their proposals as part of this consultation process without restarting the process.

“Train operators have entered into discussions with the passenger bodies to take account of the feedback received through the consultation responses. We expect train operators to work collaboratively with the passenger bodies in the coming weeks, listen to the concerns raised and to refine their proposals accordingly.”

“We expect to see operators develop and adapt their proposals where needed in response to points raised in the consultation.”

*Liaison with other operators*

**Q. What assessment has been made of the impact on services operated by other train companies? Have those operators agreed to the changes?**

c2c has important duties to other train companies, their staff and customers. That's why in developing our proposals we have considered not only c2c's own network and customers, but also those of other train operators, including those with station access rights to c2c managed stations.

c2c has consulted all train operators with station access rights plus Transport for London. Now that the consultation period has closed, we can confirm we have not received any objections from these parties.

In terms of analysis on other operator's passenger services, Arriva London Rail (as London Overground concessionaire) and London Underground Limited are the only scheduled passenger operators to have access rights at any c2c stations in the London TravelWatch area.

Today c2c stations are an anomaly for the London Overground and London Underground service groups which serve c2c managed stations and the surrounding communities. These proposals bring

customer information, assistance and retail arrangements at c2c operated stations in line with London Overground Gospel Oak to Barking line stations and London Underground stations, creating an easier to understand and consistent approach for East Londoners.

**Q. Have any discussions been had with Network Rail about the impact at NR managed stations?**

This will have a very limited impact on c2c passengers as the vast majority of our services do not use a Network Rail managed station. They provide passenger assistance services for us when we are diverted to London Liverpool Street for engineering works – this will not change.

## Annex A- Retail mitigations and enhancements

Passenger bodies have asked whether any of the following ticketing products can be provided from a TVM. The below retail mitigations and enhancements are currently under discussion across industry. Some of these will continue to evolve as the policy is developed and agreed.

Any associated costs with the delivery of changes mentioned below is specifically excluded from c2c's proposal. It is c2c's understanding that the required funding for these changes may be made available centrally through the Department for Transport and the Rail Delivery Group.

### *Advance tickets and reservations*

c2c TVMs allow remote purchase where customers can change the Origin – this is specifically helpful for customers looking for Advance tickets on other operator's routes.

### *Season tickets*

c2c offers weekly and monthly season tickets at TVMs.

We are currently working across the industry to develop a policy and an effective approach for season tickets longer than a month. Annual season tickets will not be available via TVMs. However, the industry is investigating the option to mandate all season tickets to Smart ticketing media (Smartcards).

Subject to finalising the relevant funding agreements and assessments, these changes could be fully implemented in 2024. Until then, passengers will be able to purchase their tickets through:

- Direct online (via website or App)
- Customer Information Centres

### *Railcard Sales (National and regional)*

Railcard discounts are available across all retailing channels including TVMs

The current policy is that Railcards will be issued online, and at Customer Information Centres. Most Railcards are available from National Rail, TOCs and Third Party Retailers. Some Railcards (that require additional verification) are only available from National Rail. Subject to finalising the relevant policy, these changes could be fully implemented by 2024. Until then, passengers will be able to purchase their Railcards through:

- Direct online (via website or App)
- Customer Information Centres

### *Apex single and return tickets*

c2c TVMs already allow the purchase of Apex single and return tickets.

### *Car park tickets*

c2c does not currently retail car park tickets at ticket offices. This is managed through third party suppliers (e.g. NCP).

## Refunds



We are currently working across the Industry to develop a policy and an effective approach for refunds and replacements of tickets purchased via TVMs. The intention is for all TOCs to provide refunds via their online channels, possibly through uploading a photograph of the cut-up ticket. In addition, it may be possible to offer refunds via the TVM using a TVM 'Staff Mode'

Replacement tickets, for example, Seasons, where the ticket is damaged or faulty will be issued online, from Customer Information Centres. The adoption of this policy change will require updates to existing retail channels and facilities, including TVMs. Subject to finalising the relevant agreements, the intention is to have these processes in place in 2024. Until then Customer Contact Centres will be able to assist with these transactions.

### *National concessions for disabled people (for wheelchair and visually impaired passengers plus a companion)*

We are currently working across the Industry to develop a policy and an effective approach for facilitating Special Disabled Fares (SDF) The intention is to provide those passengers meeting the SDF eligibility criteria with a Disabled Persons Railcard (DPRC). They will be able to purchase discounted tickets from an increased number of retail channels and across a broader range of ticket types, for example, TVMs and online channels, making them much more accessible.

This will require changes to policy, backend systems and all retail systems as currently the SDF is only available at Ticket Offices. Subject to finalising the relevant funding agreements and assessments, these changes could be fully implemented in mid 2024.

In the very small number of cases that a customer is not able to buy the product at their origin station via these mechanisms, we are ensuring that the customer is able to board the train and buy on the train or at their destination. This is based on the pre-existing conditions of travel.

### *Boundary Zone add-ons*

c2c TVMs already allow the purchase boundary zone add- ons.

### *Staff travel discount*

There is an existing online industry portal that can retail to staff members. Staff discounts are not currently available on the TVM. We are working with industry to agree the appropriate policy. Until then, passengers will be able to use their staff travel discount through:

- Digital (online industry portal)
- Customer Information Centres

### *Buying tickets in advance rather than on the day of travel*

c2c TVMs allow buying tickets in advance (for single and returns) rather than on the day of travel.

### *Tickets for travel that do not involve the 'host' station*

c2c can retail and issue remote tickets that do not originate at the retailing channel.

### *Seat reservations*

c2c TVMs allow for seat reservations if booked at time of purchase.

### Changing a booking/tickets

We are currently working across the Industry to develop a policy and an effective approach for changing a booking or tickets purchased via TVMs. The intention is for all TOCs to enable changes via their online channels. In addition, it may be possible to offer these changes via the TVM using a TVM 'Staff Mode'. [Subject to finalising the relevant agreements](#), the intention is to have these processes in place in 2024. Until then, Customer Contact Centres will be able to assist with these transactions.

### Use of rail vouchers

We are currently working across the Industry to develop a policy and an effective approach for Rail Travel Vouchers (RTV) The intention is for TOCs to prioritise the use of BACS, refunds to credit and debit cards and other automated payment methods such as PayPal and Amazon.

RTV and cashable vouchers will still be available for issue, should a customer insist on it, but customers should be advised about the benefits of using other methods of payment (see above).

Where TOCs offer vouchers, these should wherever possible be e-Vouchers redeemable via their websites and apps. The adoption of this policy change will require updates to existing retail channels and facilities, Customer Information Centres, or via Contact Centres. All TOC frontline staff will be briefed on the new policy regarding RTVs. All TOC customer relations staff will be briefed on the new policy regarding RTVs.

Subject to finalising the relevant agreements, the intention is to have these processes in place in 2024. In the meantime, Customer Information Centres will be able to accept rail travel vouchers and cashable vouchers.

### Use of rail warrants

We are currently working across the industry to develop an effective approach to issuing warrants, including online. Subject to finalising the relevant agreements, the intention is to have these processes in place in 2024. Until then, station staff will be able to assist with warrants at Customer Information Centres.

### Ranger and Rover tickets

c2c offer our own local Senior Rover across all retailing channels

The intention is for all Rovers and Rangers Tickets to be available through our TVMs. Subject to finalising the relevant funding agreements and assessments, these changes could be fully implemented in 2024. Until then, passengers will be able to purchase these tickets through:

- Direct online (via website or App)
- Customer Information Centres

### PlusBus tickets

PlusBus is available when purchased as an add on to a Rail Ticket at TVMs.

### Group Save

GroupSave is available from all retailing channels including c2c TVMs

### Off-peak purchases before the off-peak begins

Customers can change the date and time of their purchase across all retailing channels including TVMs so customers are able to purchase their off-peak ticket prior to the off-peak commencing.

### Cycle reservations

Given the priority is to explore the possibility of upgrading TVMs to accommodate those products greatest in demand in line, taking into account relevant costings, these are not being explored as part of the TVM upgrades at this time.

### Photocards for season tickets

The industry has agreed the policy to remove the requirement for a Photocard when purchasing a Season Ticket. Where a form of ID is required for the purchase of a Season Ticket, any reasonable alternative form of ID shall be accepted. Subject to finalising the relevant funding agreements, these changes could be fully implemented in 2024. Until this time, it is the intention that customers with no photocard will be able to enter a generic number into retail systems.

#### IF FURTHER DETAIL REQUIRED:

The adoption of this revised policy is already allowed for under NRCoT and the TSA and will greatly simplify and streamline the Season Ticket retail process. It will remove the requirement for the use of rail industry specific ID that is cumbersome and requires either face-to-face interaction or issue by post, and allows for the adoption of more flexible, digital alternatives.

A reasonable alternative form of ID may include a driving licence, passport, railcard, or national ID card. A rail issued Photocard may continue to be used where they are available.

Where a customer purchases on Season Ticket on a c2c Smartcard, this is already a process in place where customers require a form of ID.

## Annex B – c2c station staff presence

The table below captures the hours staff will be at stations within the Transport Focus area. c2c has addressed staffing concerns raised by the transport bodies by ensuring floor walker staff will be available at the stations highlighted in red below. Changes in red highlight where additional hours have been added to the c2c proposal.

Station	Monday-Friday				Saturday				Sunday			
	Current Ticket Office Hours	Proposed Ticket Office Hours	Proposed Floorwalker Hours	Proposed Station Presence Hours	Current Ticket Office Hours	Proposed Ticket Office Hours	Proposed Floorwalker Hours	Proposed Station Presence Hours	Current Ticket Office Hours	Proposed Ticket Office Hours	Proposed Floorwalker Hours	Proposed Station Presence Hours
Basildon*	05:15 21:00	06:00 20:00	06:00 20:00	04:30 01:30	05:15 21:45	07:00 20:00	07:00 20:00	04:45 01:30	06:15 20:45	07:00 19:00	07:00 19:00	07:00 01:00
Benfleet*	05:15 21:30	05:00 20:00	05:00 20:00	04:15 02:00	05:15 21:45	06:30 19:30	06:30 19:30	04:45 02:00	06:15 21:15	06:30 19:30	06:30 19:30	06:00 22:00
Chalkwell	05:15 19:45	Closed	05:00 20:00	05:00 01:45	06:45 16:15	Closed	08:00 15:00	04:00 01:45	07:45 15:30	Closed	08:00 15:00	05:30 01:15
East Tilbury	06:15 10:45	Closed	06:15 10:45	06:00 01:00	07:30 13:15	Closed	07:30 13:15	06:00 23:00	Closed	Closed	Closed	07:00 19:00
Laindon	05:15 20:30	Closed	06:00 20:00	04:30 01:30	06:15 20:45	Closed	07:00 20:00	04:45 01:30	07:15 21:00	Closed	10:30 17:30	05:00 01:00
Leigh on Sea	05:15 20:00	Closed	05:00 20:00	05:00 20:00	06:15 20:00	Closed	07:00 21:00	07:00 01:45	07:15 19:30	Closed	07:00 20:00	07:00 00:00
Pitsea	05:15 20:00	Closed	06:00 20:00	06:00 01:15	06:15 20:00	Closed	08:30 16:30	04:00 01:30	06:45 20:45	Closed	08:30 16:30	05:45 01:15
Shoeburyness	06:15 12:30	Closed	04:00 22:00	04:00 02:00	08:30 17:15	Closed	06:00 16:00	06:00 02:00	08:45 14:30	Closed	06:00 15:00	06:00 02:00
Southend Central*	05:45 18:45	06:00 20:00	06:00 20:00	24 hours	06:30 21:00	07:00 21:00	07:00 21:00	24 hours	07:30 19:00	06:00 21:00	06:00 21:00	24 hours

Station	Monday-Friday				Saturday				Sunday			
	Current Ticket Office Hours	Proposed Ticket Office Hours	Proposed Floorwalker Hours	Proposed Station Presence Hours	Current Ticket Office Hours	Proposed Ticket Office Hours	Proposed Floorwalker Hours	Proposed Station Presence Hours	Current Ticket Office Hours	Proposed Ticket Office Hours	Proposed Floorwalker Hours	Proposed Station Presence Hours
Southend East	05:15 18:00	Closed	05:00 20:00	05:00 22:00	06:30 15:30	Closed	04:15 16:00	04:15 00:00	08:00 15:15	Closed	05:30 16:00	05:30 00:00
Stanford-le-Hope	05:30 19:15	Closed	06:00 20:00	05:00 01:15	06:30 19:15	Closed	07:00 20:00	06:00 00:00	08:15 16:00	Closed	08:30 15:30	06:00 23:00
Thorpe Bay	05:30 17:15	Closed	06:00 13:00	06:00 01:30	07:00 15:15	Closed	06:00 15:00	06:00 23:00	08:00 15:45	Closed	06:00 15:00	06:00 22:00
Tilbury Town	05:30 19:15	Closed	04:45 19:00	04:45 01:15	06:15 19:30	Closed	08:30 15:30	04:45 00:00	08:15 16:15	Closed	08:30 15:30	05:00 00:00
West Horndon	06:15 10:30	Closed	06:00 10:00	06:00 10:00	08:30 14:45	Closed	09:00 13:00	09:00 13:00	Closed	Closed	Closed	n/a
Westcliff	05:45 16:45	Closed	05:00 20:00	05:00 01:30	07:00 15:15	Closed	06:00 14:00	06:00 01:45	07:30 15:00	Closed	07:00 14:00	06:00 00:00

\*Customer Information Centre

For avoidance of doubt, "Proposed floorwalker hours" will be fulfilled by redeployed c2c ticket office colleagues, who already have enhanced ticketing, fares and retailing training. The "Proposed Station Presence Hours" are more likely to be covered outside of "Proposed floorwalker hours" by gateline colleagues, who will be predominantly in place to provide a visible security and safeguarding presence, and to provide passenger assistance where required. They will not undergo specialist training on fares, ticketing and retailing but they are trained to assist.

Proposed Floorwalker Hours	Proposed Station Presence Hours
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