

TransPennine Express' proposed changes to ticket offices: Transport Focus response

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

1. Introduction

This is Transport Focus's formal response to TransPennine Express's (TPE) proposal to change ticket office opening hours at regulated stations. It outlines responses received during the public consultation which began on 5 July 2023 and then sets out Transport Focus's conclusions.

Transport Focus recognises that the way many passengers buy their ticket has changed, with increasing numbers choosing to buy online, use apps or Pay As You Go contactless payment. We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 12 per cent of sales on average.

We acknowledge that the proposal was designed to respond to this shift in customer behaviour, with the aim of bringing staff out from ticket offices to better meet customer needs. It is important to stress that Transport Focus is not against the principle of 'bringing staff out from behind the glass'. Our conclusions below are based solely on the specific proposals received for each station and the potential impact on passengers.

2. Executive summary

TransPennine Express (TPE) published details of its original proposal on 5 July. The public consultation on this ran until 1 September. Transport Focus received 35,380 representations objecting to TPE's proposal and 11 representations supporting TPE's proposal.

Transport Focus acknowledges that TransPennine Express has made improvements to its original proposal. Your specific station proposals meet many of the criteria set by Transport Focus. However, we still have a number of industry-wide generic issues which give continued cause for concern. These are specific to all operators and, while we are willing to continue engaging with the industry on these, they have not yet been resolved. As a result we must object to all 14 proposals to close ticket offices at TransPennine Express stations. We have also objected to the proposals to significantly reduce the ticket office opening hours at Huddersfield and Manchester Airport. A full list of stations is provided at the end of this letter.

On 6 September Transport Focus raised concerns with the proposals and asked a number of clarification questions based on our initial analysis and from the main themes seen in the public responses at that point. TransPennine Express's response proposed some significant enhancements to the original proposal.

Transport Focus acknowledges that TransPennine Express has made improvements to its original proposal. Your specific station proposals meet many of the criteria set by Transport Focus around staffing, information and perceptions of safety. However, having analysed these revised proposals we still have concerns. Most are generic issues at an industry-wide level that are relevant to all train companies. We are willing to continue engaging with the industry on these, they have not yet been resolved. As a result we must object to **all** 14 proposals to close ticket offices at TransPennine Express stations. We have also objected to the proposals to significantly reduce the ticket office opening hours at Huddersfield and Manchester Airport. A full list of stations is provided at the end of this letter.

The main reasons for this are:

- Welcome Points

In response to concerns TransPennine Express proposed that 'Welcome Points' will be developed at stations as an initial focal point that provides any customer who needs support and/or advice a place to start their journey. We think there is merit in this idea but there is much that still needs to be developed, such as a mechanism for alerting staff that someone is at the Welcome Point and needs assistance and whether induction loops would be fitted.

Welcome Points were not explained as part of the original consultation, so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. We believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of Welcome Points. We also believe they should be piloted/trialled to establish what works best at different types of stations and to gather passenger feedback.

- Queuing standards at Ticket Vending Machines

We believe that there is a need for a nationally agreed, and enforceable, queuing time metric for Ticket Vending Machines (TVMs). This could be based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken.

There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct.

- Future regulation

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

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

We believe an alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

3. The process

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

The public consultation began on 5 July and was originally scheduled to end on 26 July, 21 days being the consultation period specified in the TSA. 13 train companies announced their plans simultaneously, of which 12 had stations in Transport Focus’s operating area, the exception being Southeastern.

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

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

4. Responses to the consultation

During the consultation period we received a total of 585,178 responses by email, webform, freepost and phone. Some were specific to individual stations, some were specific to train companies as a whole and some were at a network-wide level, objecting to the proposals by all train companies. In addition, we also received a total of 257 petitions.

There were two specific campaigns launched which generated a large number of responses; one by the RMT union which involved emails and 'postcards', and another via the workers' rights network, Organise, which was via email. While the majority of these responses followed a standard template some had been customised. All have been counted and any that have been customised or contain reference to a specific station identified.

We received 35,380 objections to TransPennine Express's proposals.

The top three themes in responses were concerns over the ability to buy tickets in future (including difficulties in using TVMs), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. The common theme running throughout responses was the role, and value, of staff in delivering all of these.

In addition, we received 93,185 network-wide objections opposing changes across all stations.

We also received many responses from stakeholders including MPs, local authorities and representative organisations.

More detail can be found in Annex 1.

We also received 11 representations supporting TransPennine Express's proposal to close ticket offices out of a total of 721 nationally.

It is important to note that these are the number of *responses* to the consultation and *not* the number of people who responded. Under the TSA the train companies were, in effect, seeking views on each station in their area – it was not a national

consultation. Some people sent objections for individual stations, others sent a reply to each train company objecting to all stations in their area.

5. Criteria for assessment

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

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

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

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

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

- *Passengers can easily buy the right ticket for the journey they want to make.*
This included the product range available at the station, what support is available to advise/help with a purchase and access for people who need to use cash or do not have a smartphone.
- *Passengers requiring assistance to travel receive that assistance in a timely and reliable manner.*
This included arrangements for providing booked assistance (using the Passenger Assist process), assistance provided on a ‘turn-up-and-go’ basis, the support available when buying a ticket and the ease of requesting assistance.
- *Passengers can get the information they require to plan and make a journey, including during periods of disruption.*
This included the information channels available at the station and the support available to help passengers who need assistance.

- *Passengers feel safe at a station.*
This included perceptions of personal security and how train companies will provide reassurance for passengers wanting to travel.
- *Passengers are not penalised if they cannot buy the ticket they require from the station.*
This included arrangements for issuing Penalty Fares or prosecutions for fare evasion.
- *Passengers can continue to use facilities at a station.*
This included access to facilities such as waiting rooms, toilets, lifts and car parking.

Transport Focus made clear it would focus its assessment on the impact of the proposals on quality of service for passengers, however we acknowledge that cost effectiveness is also part of the formal criteria. Transport Focus has not received details on cost effectiveness or cost savings from train companies. Our focus has been on ensuring that passengers retain access to core products and services at stations rather than the cost of delivery, but we recognise that there could be efficiency savings within proposals.

Our published criteria also highlighted that the presence of staff at a station plays a key role in the railway meeting passengers' expectations in many of these areas, so station staffing would be a key consideration in our assessment.

6. Our assessment

Transport Focus used information provided by train companies and the issues raised by passengers to analyse proposals against the criteria set out above. On 6 September we wrote to each train company raising concerns with the proposals and asking a number of clarification questions based on our initial analysis and from the main themes seen in the public responses at that point. TransPennine Express replied on 27 September. These letters are attached as Annex 2 and 3.

TransPennine Express's original proposal was to:

- Retain ticket offices at Huddersfield and Manchester Airport with significantly reduced ticket office opening hours, but with 24 hour staffing as now and multi-skilled staff available to support passengers outside ticket office opening hours.
- Close 14 ticket offices with multi-skilled staff instead available outside of the ticket office and able to support passengers to purchase tickets digitally or from TVMs at the station.
- At the 14 stations where the ticket office was proposed to be closed there were three variations in the staffing hours proposed:

- Stations where staff would be available at the station 24 hours a day (Hull as is already the case, and Middlesbrough would have staffed hours extended).
- Stations where staff would be available at the station for part of the day, for the same times as now (Scarborough, Selby and Thirsk).
- Stations where staff would be available at the station for fewer hours than now and focused on the busiest times (Brough, Grimsby Town, Scunthorpe, Cleethorpes, Malton, Stalybridge, Dewsbury, Northallerton, Thornaby).
- That passengers would continue to be able to access other station facilities, such as waiting rooms and toilets, with the same availability as currently provided.
- That new TVMs would be rolled out, with an increase from 29 to 43 in total across the 16 stations. These TVMs would be subject to an upgrade, which is already committed and funded, to enable them to sell more products including Advance tickets.
- That if a passenger cannot purchase a product online or from a TVM at their TPE station, they would be able to purchase the product from either another station that has a ticket office, from train operator contact centres that offer telesales or on-board.
- For the small number of rail products that can currently only be bought from a ticket office, until such time as these products are more readily available via other channels, the ticket office machine would be retained to provide these products during station staffed hours.
- Five stations would have TVMs that accept cash. At other stations passengers paying with cash could purchase their ticket onboard.

Following further discussion with Transport Focus TPE's letter of 27 September made some significant changes to your proposals:

- Amendments to the hours during which stations will have a permanent staff presence. The revised proposals would not see any reduction in staffed hours at any station. Therefore, staff would be available to assist customers with ticket purchasing for the same hours as today.
- The creation of 'Welcome Points'. These would be an initial focal point on entering a station where passengers could access support and/or advice from staff. They would include '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.'
- Proposal to install an additional TVM at Stalybridge station and to provide a cash TVM at Middlesbrough station.
- You also subsequently confirmed 'that at stations where we originally proposed a reduction in staffing times, our revised proposals will maintain the same staffing hours and provide the same level of staffing as currently

available on each shift, typically one member of staff per shift. At our larger stations with more than one member of staff on shift we have also adjusted our staffing proposals to provide a greater number of staff on duty compared to our original proposals.'

We acknowledge that you have made significant changes to your original proposal in response to passenger feedback from the consultation, especially in no longer reducing staffed hours at any stations. We know from our research that passengers value staff at stations highly for safety and security, information, and advice and help purchasing tickets.

Comments received during the consultation overwhelmingly reinforced this point with concern about availability of staff at the station the most important theme in the responses:

"I often need my ticket office as an essential way to navigate the rail network and make sure I am getting the right ticket, advice on how to best execute my travel plans, and support with any other questions. This cannot be replaced by a ticket machine only. The ticket office staff are irreplaceable." Hull passenger

"Middlesbrough ticket office have amazing, helpful and supportive staff which provide a service that is needed!! Don't close Middlesbrough ticket office!!! Customers need direct contact with staff for advice!!" Middlesbrough passenger

"I work with learning disabled adults. Everything we do is about independence and skills for life, gaining confidence to go out into the world and taking opportunities to grow. Many such adults can and do make journeys alone but these citizens need a friendly face to approach with questions about travel, about options, connections, prices, travel assistance options, and especially they need a safety net when plans go wrong - when trains are delayed or cancelled, etc." Malton passenger

We will now address each of our criteria points in detail against your revised proposal.

6a) Passengers can easily buy the right ticket for the journey they want to make

In our letter of 6 September we set out a number of issues arising from passenger submissions to the consultation and our own analysis. It was clear from the consultation that this was a key area of concern for passengers.

Complexity of fares and ticketing

We acknowledge that there is a clear trend towards digital sales and away from sales at the station, and that this is likely to continue. However, a substantial number of people either cannot or have chosen not to move to digital to date.

Some, such as those who are unbanked and/or have no access to digital channels, have little choice but to buy from the station. Others are reluctant to move online – our research shows that this resistance often comes from uncertainty and a lack of confidence, exacerbated by the complexity and variety of ticket options available. This is not only a matter of personal preference, it is often for hard, practical reasons about routing or time restrictions and concern about the consequences of buying the wrong ticket, including potentially paying more than they needed to. Staff support often offers confidence that the most appropriate ticket for the journey has been purchased.

Comments received during the consultation illustrate this point:

“Most journeys from Hull Paragon are complicated and involve changing trains given Hull's geographical location. The staff in the ticket office are needed to advise on the best routes. I always get their advice. I think losing those staff will mean that I will pay over the odds for overly long and complicated journeys.”

Hull passenger

“Closing our local ticket office will be the end of rail travel for me. I need their information and advice and help. There is always a long queue at Scarborough Ticket office. I belong to the generation considered beyond help on the internet.”

Scarborough passenger

“As 75 year old widow ... I always try to buy my tickets online but this is not always possible as it sometimes says 'no prices available for this journey'. I then have to drive to Northallerton station ticket office to buy my tickets. The staff there are always very helpful and sort my tickets out for me. I do not see how I could manage without this facility. Whenever I go there, there is always a queue as many more people have complicated journeys which need assistance. It is too simplistic to say everyone could buy tickets online or at a machine.”

Northallerton passenger

“First off, I'm pretty computer savvy. I use IT and websites all the time. Despite this, the ticket staff's expertise is invaluable in terms of wading through the quagmire of fares, routes, options etc. I used the ticket office just last week to discuss options for my train ticket as it wasn't clear from apps or machines or websites which one was my best option.”

Huddersfield passenger

Useability of Ticket Vending Machines

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

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

Even where staff will still be present at the station it will be important that they have sufficient expertise to help passengers navigate the complex fares system. In contrast to many other self-service retail situations, for example a self-checkout at a supermarket, many passengers will need support not just to use the ticket vending machine (TVM), but also to understand what they should purchase and provide confidence they are getting the best deal.

An increased reliance on TVMs makes it even more important that they are monitored and maintained. This applies to operational resilience and to customer service quality. There are standards for queuing times at ticket offices (three minutes in the off-peak and five minutes in the peak). It is a requirement that these are monitored and reported on. There are no such targets for TVMs.

The useability of TVMs came through strongly in the consultation responses.

"The decision to close my local station ticket offices – Brough and Hull - is totally wrong... My parents don't have a smart phone, and my mum will not use the ticket machine if I am not there, as it totally frightens her, so that will stop her going to York for nice days out and to Goole for the dentist." Brough passenger

"Profoundly deaf with vision issues. Don't have a smartphone. Need to buy tickets from a person as not able to buy tickets far enough ahead to get them by post. Have tried ticket machines but difficult to navigate, especially with a growing queue of people behind you, and they do not immediately offer the cheapest option, this needs to be searched for. If trains are cancelled, a person needs to be available to give advice about alternative routes." Stalybridge passenger

“The machines take too long to use and you would find yourself in a messy queue with confused tourists and others wielding copious amounts of luggage whilst they are trying to get to grips with an unfamiliar machine with unfamiliar place names etc. It's essential to have a ticket office at important transport hubs.” Manchester Airport passenger

“I have mobility difficulties and often need to ask someone for assistance, particularly if trains are cancelled, as they often are. I also have arthritic hands and using machines is very difficult, as is having to open my purse and try and get card out safely when others are around. The ticket office is a much safer place for me.” Cleethorpes passenger

Retail capacity

Closing ticket windows also raises questions of retail capacity at the station – can TVMs cope with an increased level of sales? If not, then there is a risk of passengers being faced with unacceptable queues to purchase tickets, of missing trains, or in boarding without a valid ticket.

“I'm concerned about the capacity to issue tickets at the required volume during peak periods. Currently there are queues with the current provision of machines plus ticket office staff. If one is removed capacity will be reduced. Are you planning to install more machines?” Huddersfield passenger

“The station is very busy meaning that there is often a queue at the ticket office. The single platform ticket machine is slow and can be used by only one person at a time. What are we supposed to do - get on the train without a ticket and face a hefty penalty? Or miss the train in order to buy a ticket?” Malton passenger

“I am 83 year old and a frequent train user. I find the ticket machines very confusing and difficult to handle. I have seen other people experiencing difficulty in using them... I have seen people, some time get stuck and don't know how to deal with it resulting in them taking a lot of time. Others in the queue get desperate and can start a quarrel. Most of all if one person get stuck the rest of the queue gets delayed too which could result in missing the train.” Scarborough passenger

Cash

Not everyone has a bank account or access to debit/credit cards – some people are reliant on cash to buy tickets. The guidance issued by the Secretary of State specifically mentions the need to take into account accessibility for customers who need to use cash or do not have a smartphone or access to the internet.

Under the existing National Rail Conditions of Travel if you bought your ticket using cash (for example, from a TVM) you are entitled to a refund in cash if your train is cancelled or delayed and you decide not to travel. It is important that this could still be provided in future. Passengers without a bank account also need to be able to receive compensation if their train is delayed. Currently ticket offices offer both these services.

"I always use cash and am concerned that this will restrict my ability to buy tickets and travel. I am over 60. Older people, poorer people, the vulnerable, are more likely to be adversely affected by these proposals." Northallerton passenger

"I have arthritis in the hands making it difficult to use ticket machines and online facilities... At present you get instant refunds from the booking office, who will do this? I still need the option to pay by cash." Grimsby Town passenger

Product range

Currently ticket offices provide access to a full list of products and services. TVMs do not sell/serve all of these. For example, TPE's TVMs do not currently offer Advance Purchase fares, Car Park tickets, cycle reservations, Railcards, some Group Save tickets, Plus Bus, TfGM Wayfarer/Countycard, WY Daysaver and National concessions for disabled people (for wheelchair users and visually impaired passengers plus a companion). Nor do they allow you to change tickets/bookings or provide a means of obtaining a cash refund. At present these are available at the ticket window.

"I have an annual GM Traincard which can only be purchased from a manned ticket office... It is not even possible to find the current price of this type of ticket online; all search results say that you have to enquire at a manned ticket office to find out the current price." Manchester Airport passenger

"On several occasions within the last year I have needed to buy tickets that simply can't be bought from the machine or online, eg Over-journey excess fares, Seat reservations for a partial journey, because the train was fully booked for part of the journey, A single seat reservation covering split tickets. None of these would have been possible without staff having access to the facilities of the ticket office." Selby passenger

"I regularly buy rover tickets these cannot be purchased online or from the machines." Manchester Airport passenger

TPE's proposals (as revised) stated:

- Your revised proposals would not see any reduction in staffed hours at any station. Therefore, staff would be available to assist customers with ticket purchasing for the same hours as today.
- You subsequently confirmed in writing, 'All new employees to these multi-skilled roles that support customer retailing will be provided the same level of retail training as our existing ticket office staff.'
- You also subsequently confirmed 'that at stations where we originally proposed a reduction in staffing times, our revised proposals will maintain the same staffing hours and provide the same level of staffing as currently available on each shift i.e. typically one member of staff per shift. At our larger stations with more than one member of staff on shift we have also adjusted our staffing proposals to provide a greater number of staff on duty compared to our original proposals.'
- You would install an additional TVM at Stalybridge station.
- 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. You have provided cash transaction information (on a confidential basis) and subsequently committed to provide an additional cash TVM at Middlesbrough. You have also confirmed '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.'
- Some products (such as PlusBus, Rovers and Rangers, national concessions for disabled people, rail warrants, and rail vouchers) could also be purchased/used on the train.
- Your TVMs will be subject to upgrades. Advance Purchase fares will be available from TVMs following the upgrade that is already committed and funded and anticipated to be delivered in February 2024. You committed that 'Our TVM upgrade to provide Advance Purchase products will be complete before any ticket office closure'. You also detailed that further products and services will be available from TVMs in future as part of fully funded phase two upgrades (majority during 2024), including Car Park tickets, Remote Video Assistance and Period Season Ticket sales/renewals to smart cards (Seasons tickets longer than weekly) and cycle reservations.
- 'Unusual products/services' will still be available at the station on request via the retained ticket office machine because they are not currently available through any other channels', including:
 - o Use of rail vouchers if product cannot be retailed on board
 - o Use of rail warrants if product that cannot be retailed on board
 - o Photocards for season tickets
 - o Paper season ticket replacement
 - o Other TOC Group Save (TPE Group Save is an online only product)
 - o Esk Valley Railcard
 - o Sleeper bookings.

- You subsequently clarified in writing that ‘Our guiding principle is to support customers to purchase products digitally, as this is a very convenient option for lots of customers or through the TVM in the first instance. However, we recognise there are some customers and some products where this approach won’t work. From the outset of these proposals, we have therefore proposed retaining a ticket office machine, for staff to sensibly use to retail products on request for those instances where other options are not available to customers.’ You also committed that you would ‘provide customer information, such as a poster that would detail specific products available on request’ to ensure passengers are aware of this retained facility.
- On specific product/services you also subsequently confirmed in writing:
 - For Railcards, that ‘if the individual is unable to purchase digitally with staff assistance and or can only pay by cash, TPE will treat this as a type of Unusual Product and retail them on request at the station.’
 - ‘For cash only customers who want to buy an Advance Purchase ticket, TPE will treat this as a type of Unusual Product and retail on request at the station.’
 - ‘National Concessions – TPE has confirmed D34 and D50 concessions (for wheelchair users and visually impaired passengers) are currently and will remain available on board. Customers are currently purchasing these on board when travelling from an unstaffed station or outside times the ticket office is open. There are very low numbers being retailed at ticket offices (a total of 69 transactions in 22/23 at all stations where ticket offices are proposed to close). As today, there will no penalty or issue for disabled customers purchasing these products on board.’ You went on to confirm you will ‘promote and reassure that this concession is available on board, however if a disabled customer is not comfortable buying on board, we will retail on request at the station.’
 - ‘If a customer pays with cash at the station and requests and is eligible for a cash refund, this will be provided at the station upon request.’
 - ‘Customers requesting cash can be provided National Rail Travel Vouchers for delay repay which can be used at stations for another train ticket or for cash. We will therefore continue to provide this service on request at stations.’
- There are also industry wide proposals to:
 - Offer people eligible for the national concessions for disabled people a Disabled Persons Railcard instead.

We acknowledge the reinstatement of staff hours back to the original ticket office hours and that this will ensure that there is a member of staff present at the same times as now at most stations. We also acknowledge that the revised proposals are to increase numbers of staff at larger stations compared to the original proposal and that staff will be trained to the same level as now and will be able to help passengers

buy tickets using TVMs. We also acknowledge that retaining the existing ticket office machine will enable staff to sell products/services not available from the TVM or onboard the train.

However, we remain concerned with the following:

i) Product range availability at the station

You confirmed in writing that you 'Do not have any dated plans to remove the ticket office machine from stations. We would only consider removing the retained ticket office machine if/when the products and services it provides could be provided to customers via other means, for instance, products and services become available via a TVM or local TravelShop'.

We believe it is a basic principle that access is maintained for those who are non-digital and/or cash based. Any future alternative to continued retention of the ticket office machine would need to ensure this safety net is maintained. Any mitigation that might mean passengers would no longer be able access to products/services at the station should be subject to consultation prior to implementation.

We also note that you confirmed 'if a customer was at the station intending to travel and was not digitally enabled, could not use a telesales services and a product was not available on the TVM, we would either retail them the product on request at the station or allow the customer to buy on board.' We understand that different options will suit different people, but it would not be acceptable to expect a passenger to use telesales to purchase a ticket at the station when staff could use the retained ticket office machine. We acknowledge your assurance that 'it is not our intention to inconvenience customers and our staff will sensibly use the retained ticket office machine to retail products that customers aren't able to purchase elsewhere.' If this principle of avoiding inconvenience for customers is fulfilled, the ticket office machine is not used/only used very reluctantly as an ultimate last resort and information is provided about products/services that are available on request, then we acknowledge that this mitigation should ensure that passengers have access to products at the station. We would also expect the retained ticket office machine to be used to retail products/services not available on TVMs or onboard at Manchester Airport and Huddersfield at times that it is proposed the ticket office would no longer be open in future. If this were not the case, the two stations with retained ticket offices might in practice have more time than many other stations when passengers could not access the full product range.

Finally, we note the industry wide initiative for the national concessions for disabled people which could involve people eligible for the concession being provided with a

Disabled Persons Railcard instead. We believe that discussions on this need to involve the Disabled Persons Transport Advisory Committee (DPTAC) and disabled people/representative groups. In the meantime, these concessions would still need to be made available to passengers.

Conclusion

Subject to further discussion and clarification of the points raised above concerning the use in practice of the retained ticket office machine, we are satisfied that passengers will continue to have access to the full range of products. **No objection.**

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

Recommendation 2: The functionality and product range offered by the retained ticket office machine should be promoted and used proactively to support those who are unable to purchase the ticket they need on a TVM or online or are reliant on cash. Any future change to these arrangements should maintain this safety net and be subject to consultation.

ii) Retail capacity at the station

It can be easy to use TVMs for a simple purchase but not for a more complicated journey, especially where there are restrictions on which operator or route you can take. We believe that those transactions could take longer, especially when the people 'displaced' from ticket windows will also potentially be those less familiar with TVMs and how to use them.

While staff may be able to help people use a TVM removing ticket windows reduces the number of 'points of sale' which can be expected to result in higher demand on the remaining TVMs.

We have assessed the ticket office and TVM sales data you provided on a confidential basis. It appears that, with the additional TVM you have committed to provide at Stalybridge, all stations should have enough capacity at TVMs to cope with the volume of sales that could be displaced from ticket office windows. However, we note concerns in the public consultation about queues at TVMs and how long it can take passengers who are not familiar with them or are buying tickets for more complicated journeys.

You state, '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.’ You also state, ‘at our busiest stations, Manchester Airport, Huddersfield, Hull as well as at Dewsbury, we have revenue protection staff available who can and will queue bust.’

We acknowledge the ability to ‘queue bust’ at some stations and your willingness to monitor queuing times in your Mystery Shopper Programme. We agree that this is important. It would be no more acceptable for a person to miss a train while queuing at a TVM than it would be if queueing at a ticket office.

However, we believe that there is a need for a nationally agreed, and enforceable, queuing time metric for TVMs. This could be based on based on the existing standards at ticket office windows (three minutes in the off-peak and five minutes in the peak). This would create a formal review mechanism – if queues exceed the targets then action would need to be taken. There is also a strong argument for putting these results into the public domain, for example in Customer Reports.

There are a number of assumptions when it comes to future retailing – for example, how many people will migrate to digital channels, how many will move to TVMs, can TVMs absorb future demand? A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry projections not be correct.

Conclusion

Objection 1: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented before any changes could take place.

6b) Passengers requiring assistance to travel receive that assistance in a timely and reliable manner

In our letter of 6 September we set out a number of issues arising from passenger submissions to the consultation and our own analysis.

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in providing assistance and support. In the original proposal nine stations would have seen a significant reduction in staff presence. This would have had an impact on disabled passengers’ ability to ‘turn up and go’. While in many cases staff on the train would have been able to assist passengers on and off the train, they were unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

“My son is disabled and uses the ticket office as he can't use the machines also the staff there are amazing with him, it could also mean losing the disabled toilet.” Thornaby passenger

“Ticket office closures will mean another move towards further isolation. Ramps and disabled toilets in public spaces were a step ahead in the fight towards social inclusion. Reduction in human contact and support is a massive step back. Wrong decision. Shame on you.” Grimsby Town passenger

“Unstaffed station would be detrimental to vulnerable travellers people travelling alone, physically mentally and emotionally disabled travellers. Not everyone has access to internet not everyone wants to use cash less systems. Not everyone has ability to read and understand time tables, screens and signs. Not everyone feels safe when travelling and knowing there is a physical human point of contact is a comfort.” Scunthorpe passenger

In addition to widespread concern in the consultation about a reduction in staffing at stations, passengers were also worried that when stations were staffed they may find it more difficult to find staff. Currently passengers know to approach the ticket office – it is the focal point. We understand that guide dogs are trained to go to the ticket window, and it is also the case that ticket windows have induction loops to help people hear.

“I am a pensioner and have difficulty using to ticket machines. I think there will be issues with asking for advice from staff if there is no proper queue. People will all mill around and not take their turn. If you are wanting to catch a train it could cause all sorts of mayhem. I can't see any benefit in the proposed changes.” Scarborough passenger

“Expecting travellers to roam around a station trying to find staff to help them or advise on tickets is not realistic or acceptable. How will those staff respond to passengers with visual or hearing impairments or neurodiverse conditions who are trying to find staff and communicate with them on a busy platform?”
Dewsbury passenger

“Ticket office staff do so much more than dole tickets out. A go to point for vulnerable/disabled people. Keepers of the loo key. Knowing that whatever pickle I'm in, a human being will be sitting behind that screen. As a disabled wheelchair user, I've not got the energy to wheel thither and yon round the station trying to find a human being.” Scunthorpe passenger

TPE's proposals (as revised) stated:

- Amendments to the hours during which stations will have a permanent staff presence. The revised proposals would not see any reduction in staffed hours at any station. Therefore, staff will continue to be available at stations to deliver booked and un-booked assistance for the same hours as today.
- You subsequently confirmed 'that at stations where we originally proposed a reduction in staffing times, our revised proposals will maintain the same staffing hours and provide the same level of staffing as currently available on each shift i.e. typically one member of staff per shift. At our larger stations with more than one member of staff on shift we have also adjusted our staffing proposals to provide a greater number of staff on duty compared to our original proposals.'
- 'Welcome Points' would be developed. You subsequently confirmed 'we are planning to have a clear 'Welcome Point' at, or as close to, the entrance of the station in the concourse/waiting area which will provide customers a clear focal point to speak to staff if they require assistance. If staff are not at the Welcome Point, we will ensure it is clear to customers if staff are at the station or not, and there will be a call alert device to speak to a member of TPE staff either at the station or in our Control. This call system will have an integrated induction loop, just as our help points offer today. TPE has been discussing how to provide this facility with our accessibility panel and will continue to seek their input and advice.'
- The provision of assistance will be a priority for your multi-skilled staff.

We acknowledge the reinstatement of staff hours and at larger stations increases in staff numbers compared to the original proposals should ensure that there is a member of staff present and available to help at the same times as now. This should mean assistance is available on the same basis as it is now.

At some of the smaller stations – where ticket office staff are the only members of staff present - we also acknowledge that this could result in more physical assistance actually being available – for example, in helping with bags or showing people to the platform - in a way that is not always possible while staff are in a ticket office.

We note the concept of the 'Welcome Point' as a means of creating an alternative focal point at the station. We think there is merit in this idea but that there is much that still needs to be developed in terms of how the new Welcome point arrangements would work in practice. For example, in how people will find a staff member if they are not at the Welcome Point or alert staff they need help, whether an induction loop will be provided, what queuing arrangements will apply if several people want help at the same time, and how visually impaired passengers would know that someone offering to help was a genuine member of staff.

We are aware that industry-wide proposals on this are being discussed. However, as it stands there is lack of clarity, detail and consistency in these industry-wide proposals. We have sought assurances from all train companies on the following:

- A mechanism for alerting staff that you are at the Welcome Point and need assistance, at each station. It should be clear that this is for all passengers and not just those with a disability.
- A mechanism of informing people that the Welcome Point has shut (to avoid people waiting there after staff have gone home or where the staff member is ill/off work. This happens at a ticket office by virtue of the blind being closed).
- Clarity over what services/support will be provided to passengers (for example, would this also function as the meeting point for passengers who have booked Passenger Assistance).
- Whether induction loops would be fitted.

It is an important principle that people affected by a proposal should have a say on that proposal: “nothing about us without us”. Welcome Points were not explained as part of the consultation so passengers have not had the opportunity to comment on these plans or to highlight potential concerns. To that end we believe it is important that there is further engagement with the Disabled Persons Transport Advisory Committee (DPTAC) and with disabled people and representative groups on the concept, design and implementation of these Welcome Points.

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

We acknowledge that at Huddersfield and Manchester Airport it is proposed that the ticket office would be retained, and that staff will continue to be present 24-hours a day. However, the proposed reductions in ticket office opening hours are very significant, with opening times more than halved to just seven hours each day. Therefore, we think outside of ticket office opening hours there is a requirement for a fully developed Welcome Point to act as an alternative focal point for passengers.

Conclusion

Objection 2: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 3: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place.

6c) Passengers can get the information they require to plan and make a journey, including during periods of disruption

It is clear from the public consultation that passengers value staff at a station. Reducing the hours staff are available or making it harder to find them, would make it harder for passengers to access advice and information from staff.

“My wife and I travel by train at least once or twice every month and it is made much easier for us to buy tickets by the staff at Thornaby ticket office, they advise us of best times to travel to get the best deals, changing trains and times and all done very efficiently and always done with a smile on their faces. Quite frankly if the Thornaby ticket office was to close we would not travel nowhere near as much or indeed at all by train.” Thornaby passenger

“Cannot see the point of taking away with the ticket office at this station or others as they are a vital link between what’s happening with delays... the ticket office operative tells you if this is your train or where to change or if delayed what options, same at Malton Station which we also use, just have person on site that can help you is essential, not all us old folks are up to date with the Apps and how to use machines, I as with many other travellers always avoid machines if an option to speak to a human is there.” Thirsk passenger

“I am in my 20's and don't have a smart phone. I need a ticket office to be able to check for updates regarding train services (for example, alternatives to cancelled or delayed trains). Without a ticket office I'm unable to check if I have problems with my tickets (as has happened before).” Scarborough passenger

TPE’s proposals (as revised) stated:

- Amendments to the hours during which stations will have a permanent staff presence. The revised proposals would not see any reduction in staffed hours at any station. Therefore staff will continue to be available at stations to provide information for the same hours as today.
- Multi-skilled staff ‘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.’
- Your 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.’
- You subsequently confirmed ‘that at stations where we originally proposed a reduction in staffing times, our revised proposals will maintain the same staffing hours and provide the same level of staffing as currently available on each shift, typically one member of staff per shift. At our larger stations with

more than one member of staff on shift we have also adjusted our staffing proposals to provide a greater number of staff on duty compared to our original proposals.’

We acknowledge the commitment to amend the hours that stations are staffed ensuring there is no reduction in staffed hours at any station and at larger stations to increase the numbers of staff available compared to the original proposals. We believe that this should ensure the same level of access to staff for journey planning and disruption information as now.

Conclusion

We are satisfied that staff will be able to provide the same level of journey planning information as now, including during periods of disruption. **No Objection.**

6d) Passengers feel safe at a station

Proposals to reduce or remove staff presence at stations risked making passengers feel less safe at stations than now.

We received a number of comments about this in the consultation:

“Dewsbury is an area of social deprivation and consequently there are incidents from time to time where staff are needed to resolve a situation. I consider that the elderly, the disabled and those who are not able to use modern technology would be discriminated against. In addition, for women travelling alone, it's important to have staff around.” Dewsbury passenger

“It will make the station less safe... It's good to have different options for buying tickets so you don't have to queue, but knowing there is staff on site makes me feel more comfortable and safe, as the station feels isolated and away from people.” Northallerton passenger

“I am registered blind... I feel that the proposals would not only not allow me to purchase tickets it would also leave me feeling very vulnerable whilst on the station.” Scarborough passenger

Our research into passenger priorities in 2022* showed that personal security was the highest station-based priority for passengers. While most passengers tell us they are broadly satisfied with their personal security at the station – of those that weren't, the main cause was the antisocial behaviour of other passengers**. This ranged from people putting feet on seats or playing music loudly to drunken/rowdy behaviour

*[Britain's railway: what matters to passengers. Transport Focus, 2022](#)

**[Passenger perceptions of personal security on the railway. Transport Focus, 2016](#)

Our research also shows that personal security is a higher priority among women and disabled passengers. In 2022 we worked with Transport for the West Midlands to better understand the experiences of women and girls when travelling on public transport^{***}. Our colleagues at London TravelWatch also looked at personal security on London's transport network^{****}. It also found that women and disabled users were more likely to feel unsafe.

^{***}[Experiences of women and girls on transport. Transport Focus, 2022](#)

^{****}[Personal Security on London's Transport Network Recommendations for safer travel. London TravelWatch, 2022](#)

Good lighting, CCTV, clear sightlines, the availability of help points, and a well-maintained environment can all help people feel safer. But it is also clear that passengers still value a visible staff presence across the network. The latter provides reassurance, helping enhance passenger perceptions of personal security and acting as a deterrent to crime and disorder.

TPE's proposals (as revised) stated:

- Amendments to the hours during which stations will have a permanent staff presence. The revised proposals would not see any reduction in staffed hours at any station. Therefore staff will continue to be available at stations to provide information for the same hours as today.
- You subsequently confirmed 'that at stations where we originally proposed a reduction in staffing times, our revised proposals will maintain the same staffing hours and provide the same level of staffing as currently available on each shift i.e. typically one member of staff per shift. At our larger stations with more than one member of staff on shift we have also adjusted our staffing proposals to provide a greater number of staff on duty compared to our original proposals.'

We also understand that the Department for Transport and British Transport Police have agreed that you should complete a Crime and Vulnerability Risk Assessment reflecting the change proposals. This assessment will be completed for each station and will form part of the decision-making process before any ticket office is closed.

We acknowledge the commitment to maintain existing staffing times. We believe that this should ensure the same level of reassurance to passengers as now. Indeed, in some instances, having more a more visible staff presence could improve perceptions of safety.

Conclusion

We are satisfied that the proposal will not negatively affect passengers' perceptions of personal security at the station. **No objection.**

Recommendation 3: There should be no implementation of proposals until the crime and vulnerability audits mentioned above have been completed and any necessary actions have been implemented.

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

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

"I will also be impacted as if the machines at my station fail for any reason, I could be liable for a £100 fine. The rules around penalty fares should be reviewed if we have to rely solely on ticket machines." Huddersfield passenger

"I pay cash for tickets and not being able to purchase from the ticket office will mean I cannot use the train unless faced with a fine. I travel often for work and purchase tickets on the morning of my commute. I need to be able to use the office and not a machine." Malton passenger

TPE's proposals (as revised) stated:

- Amendments to the hours during which stations will have a permanent staff presence. The revised proposals would not see any reduction in staffed hours at any station.
- You subsequently confirmed 'that at stations where we originally proposed a reduction in staffing times, our revised proposals will maintain the same staffing hours and provide the same level of staffing as currently available on each shift i.e. typically one member of staff per shift. At our larger stations with more than one member of staff on shift we have also adjusted our staffing proposals to provide a greater number of staff on duty compared to our original proposals.'
- You '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.'
- '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.'
- You subsequently confirmed your view that the National Rail Conditions of Travel 'are adequate and already cover scenarios for not being able to purchase in advance either because there is no ticket office and/or where a customer can't purchase from the TVM.'

We again acknowledge that amendments to station staffing to ensure that there is no reduction in staffed hours at any station will address many of our concerns as there will still be someone available to provide advice and support for passengers.

However, while you are proposing to retain the ticket office machine, it is not intended that it will be used where products/services which are not available on TVMs are available to purchase onboard. Some products, for example Plus Bus, CIV tickets (for Eurostar connections), TfGM Wayfarer/Countycard, WY Daysaver and national concessions for disabled people, would be available on board the train on some routes rather than at the station. This would help ensure access, but it leads to a contradiction with Penalty Fare signage/rules requiring people to have a valid ticket before boarding.

The National Rail Conditions of Travel set out the circumstances in which a person can board without a valid ticket: where there are no facilities to buy, or they are not working; where a TVM will not accept your preferred method of payment (card or cash); or where you have a disability and facilities at the station are not accessible to you. They do not provide an explicit assurance that you can board a train if you cannot get the *type* of ticket you want. If 'pay on board' is to become standard for some products (at all times, not just outside of existing ticket office opening hours), then there will need to be explicit permission that people can do this without penalty. This will require very clear signage and notification at the station – both in terms of when you can board without a valid ticket and when you can't; and what products/services you can access on board and what you will need to purchase at the station. It could also lead to a change in the National Rail Conditions of Travel.

We have raised these concerns and you indicated you would 'consider providing additional customer reassurance with an industry agreed wording on a poster if this would help alleviate concerns.' Without clear information there is a risk that people become liable for a penalty fare or that they will buy the wrong (potentially more expensive) ticket rather than take the risk of boarding the train without a ticket.

Conclusion:

Subject to development of suitable information/signage being provided at stations to make clear to passengers when you can board without a valid ticket and what products/services you can purchase on board we can be satisfied that adequate safeguards exist to prevent passengers being penalised if they cannot buy the ticket they require from the station. **No objection.**

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

Station facilities such as waiting rooms, lifts and toilets are important to the customer experience for many passengers, while for some passengers they are an essential in

enabling them to travel by train. It's important that any changes to ticket retailing at stations should not mean any reduction in access to key passenger facilities.

“Use of the waiting room and toilet facilities will be unavailable to passengers when staff are not there as the indoor area will be locked up. So being told by TPE that stations and facilities, will still be available is nonsense, if staff are sick and the shift not covered at the moment then the above areas are locked. This will be from early afternoon.” Malton passenger

“Reducing staff hours will clearly impact customers in terms of access to waiting rooms (particularly during inclement weather) and to toilet facilities.” Grimsby Town passenger

TPE's proposals (as revised) stated:

- Your original proposals was to maintain passenger access to other station facilities, such as waiting rooms and toilets, with the same availability as currently provided.
- Your revised proposals confirmed '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.'
- It also means that staff will continue to be available to respond to any alarms (for example the alarm in the accessible toilet) for the same hours as today.

Conclusion

We are satisfied that the commitment to avoid any reduction in staffed hours at any station will mean passenger have the same level of access to station facilities as now. **No objection**

6g) Other issues

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

i) Future regulation

The public consultation feedback highlighted a widespread concern that if ticket offices are closed and 'schedule 17' regulation no longer applies, there will be no ongoing requirement to consult on any future changes. Many passengers fear that train companies will make further cuts to staff if existing regulations are removed.

“The fiction is being promulgated that station staff will be redeployed into nebulous customer service roles... Inevitably any such redeployment will be short term and soon all stations outside major cities, will be completely

unmanned. They will then be open to vandalism and general decay.” Grimsby Town passenger

“Malton is such a small station, I don't believe that staff will be available at all. it will just become an unstaffed station, which will discourage many people from using the trains altogether.” Malton passenger

“How can they possibly be ‘better placed’ to do this out on a platform, even supposing the staff keep their jobs? (It may be cynical, but we are expecting staff provision to be removed completely in the not-too-distant future.)” Northallerton passenger

Your letter of 27 September raised the possibility that the Accessible Travel Policy (ATP) process – overseen by the Office of Rail and Road (ORR) – protects those customers most in need of in-person support and assistance. It stated:

‘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.’

We think that the ATP process could be an option but feel that it may require modifications to the ATP guidance. The key requirement for us is a commitment (and process) to consult on specific changes to staffing at a station, at both an individual station level and wider. We also think there is a need to maintain public engagement as well. The value of this can be seen in the current process whereby train companies have responded to passenger feedback – that improvement loop would be lost if there was no mechanism in future.

We believe that there needs to be a commitment/process in place before changes can go ahead.

Conclusion

Objection 4: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

ii) Timing of mitigations

Transport Focus is on record as saying that mitigations need to be in place before the changes come in [[Evidence](#) to the House of Commons Transport Committee hearing – 13 September 2023].

TPE's letter of 26 September states:

- '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 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.'
- '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.'

The other main mitigation in your proposal is the decision to retain the ticket office machine to retail products not available from TVMs or onboard the train. As previously mentioned, we believe that this safety net should be retained for those who are non-digital and/or cash based.

Other mitigations have also been proposed around TVM upgrades, Welcome Points and Crime and Vulnerability surveys. We have already set out in the sections above the importance of these being addressed prior to any changes at ticket offices – see objections 2 and 3 and recommendation 3.

There would also be a need for a clear, co-ordinated communication plan surrounding any changes. This would need to set out clearly what was being done and by when. This will be especially important given that proposals have changed since the original consultation – passengers will need to be guided through the improvements and mitigations.

Conclusion

Recommendation 2 applies again: The functionality and product range offered retained ticket office machine should be promoted and used proactively to support those who are unable to purchase the ticket they need on a TVM or online or are reliant on cash. Any future change to these arrangements should maintain this safety net, and be subject to consultation.

Recommendation 4: It will be essential that there is a clear, co-ordinated communication plan to inform passengers.

iii) Monitoring and review

We do not think there has been enough focus in plans on reviewing and monitoring changes should they go ahead. There is a need to assess whether mitigations have been delivered and, crucially, whether passengers feel the new arrangements are working. This would require research with passengers and a series of metrics designed to monitor the impact.

As stated earlier, we think this must include queuing time metrics at Ticket Vending Machines (TVMs). A robust queuing time regime (with enforcement) will help provide reassurance and safeguards should industry forecasts not be correct. This regime must be in place before any changes took place.

Conclusion

Objection 5: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

7. Assessment for each station

Objection 1: Queuing time targets, monitoring and reporting for TVMs (based on that currently in use at ticket windows) must be implemented before any changes could take place.

Objection 2: We believe that there must be further engagement (as above) on the design, location and implementation of Welcome Points.

Objection 3: We believe that the Welcome Point concept must be piloted and reviewed before any changes to ticket offices take place

Objection 4: An alternative engagement/consultation mechanism is required for any future material changes in staffing at a station.

Objection 5: There must be a robust monitoring and review mechanism in place to review any changes. This must include queueing time metrics.

The above sets out Transport Focus's assessment of TPE's proposals and our conclusions. This results in the following assessment for each station:

Station	Decision	Grounds for objection (see text above)
Brough	Objection	1, 2, 3, 4, 5
Cleethorpes	Objection	1, 2, 3, 4, 5
Dewsbury	Objection	1, 2, 3, 4, 5
Grimsby Town	Objection	1, 2, 3, 4, 5
Huddersfield	Objection	2, 3
Hull	Objection	1, 2, 3, 4, 5
Malton	Objection	1, 2, 3, 4, 5
Manchester Airport	Objection	2, 3
Middlesbrough	Objection	1, 2, 3, 4, 5
Northallerton	Objection	1, 2, 3, 4, 5
Scarborough	Objection	1, 2, 3, 4, 5
Scunthorpe	Objection	1, 2, 3, 4, 5
Selby	Objection	1, 2, 3, 4, 5
Stalybridge	Objection	1, 2, 3, 4, 5
Thirsk	Objection	1, 2, 3, 4, 5
Thornaby	Objection	1, 2, 3, 4, 5.

Transport Focus
31 October 3033

Annex

- 1 - Total objections received for TransPennine Express
- 2 - Transport Focus's letter of 6 September
- 3 – TransPennine Express's 27 September response to that letter

Annex 1: Total objections received for TransPennine Express

Station specific objections:

Brough	71
Cleethorpes	127
Dewsbury	545
Grimsby Town	184
Huddersfield	423
Hull	774
Malton	342
Manchester Airport	59
Middlesbrough	218
Northallerton	312
Scarborough	448
Scunthorpe	252
Selby	438
Stalybridge	256
Thirsk	194
Thornaby	440
Total	5083

In addition to the 5083 station specific objections listed above Transport Focus also received 30,297 responses objecting to TransPennine Express's proposals in general.

Total TransPennine Express objections: 35,380

Transport Focus also received a further 93,185 responses objecting to the proposals nationally which were not attributable to a specific station or train company.

Some responses received by our shared Freepost address and addressed jointly to Transport Focus and London TravelWatch have been counted by both organisations as the objection could apply to stations in both organisations' areas.

The following station specific petitions (with the number of signatures) were also received by Transport Focus in response to TransPennine Express's proposals:

Cleethorpes	384
Malton	2122
Middlesbrough	582
Northallerton	1256
Scarborough	72

Scunthorpe	753
Thirsk	259
Thornaby	2225.

We received copies of the following online petitions:

Change.org - <https://www.change.org/p/save-our-railway-ticket-offices>

Megaphone - <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices>

We are also aware of the following online petitions:

Parliament - <https://petition.parliament.uk/petitions/636542>

38degrees - <https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition>

We also received a report on a survey from 38 Degrees with 26,194 responses objecting to the changes nationally.