



# Ticket office consultation: summary of responses

December 2023

## 1. Introduction

On 31 October 2023 Transport Focus objected to train company proposals to close ticket offices. Subsequently, the Department for Transport and train companies announced that all plans had been withdrawn.

Transport Focus has [published detailed responses](#) to each train company setting out the reasons behind this decision. This document sets out Transport Focus's decision and provides a post-consultation summary for the process. It will cover:

- the main reasons for Transport Focus objecting to the proposals
- an outline of the consultation process
- a summary of responses from the public and organisations
- a demographic survey of consultation respondents
- the criteria used to assess train company proposals.

Together with London TravelWatch we received 750,000 responses from individuals and organisations to the public consultation on the proposals. Those responses contained powerful and passionate concerns about the potential changes. Transport Focus would like to thank all those who took the time to take part. The main themes that emerged from the responses included ticket machine capability, accessibility and how passenger assistance and information would be delivered in future.

During this process, Transport Focus's discussions with train companies led to significant amendments and revisions to original proposals, demonstrating the value of this independent review process. Many revised train company proposals reinstated existing staffing hours, identified new and innovative solutions, promised extra facilities to sell all ticket types and cope with cash payments and refunds. Some proposals, such as those from Great Western Railway and TransPennine Express, subsequently met the majority of our criteria. However, across all proposals, there were key issues that were critical to maintaining accessibility for all to the national network that remained unresolved.

Transport Focus also recognises that the way that many passengers buy their ticket has changed, with increasing numbers choosing to buy online, or through apps or via Pay As You Go contactless payment. We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 12 per cent of sales on average. Transport Focus is also supportive of the principle of redeploying staff at *some* stations from ticket offices to improve the overall offer to the passenger.

We also recognise the extreme financial pressure facing the railways and the need to find new, cost-effective ways of working. However, the detail around some of the proposals, particularly new customer support arrangements, were not well-developed. A lack of an overall delivery plan also raised concerns that closures may occur before new arrangements were in place.

## 2. Summary of key reasons for Transport Focus's objection

Transport Focus's [responses to each train company](#) outline the specific reasons for objection at each station. However, there were a number of common areas of concern across many train companies' proposals. These key reasons for objecting to the proposals were:

### Station staffing

Many of the original proposals contained significant reductions in staffing hours. In response to public concerns most train companies significantly revised their proposals and agreed to revert to existing staffing hours. However, at a minority of stations the proposals were still to reduce staffing hours. At these stations we were not satisfied that the proposals represented an improvement for passengers requiring assistance, information, advice or for passengers' perceptions of personal security.

### 'Welcome Points' proposals

In response to concerns raised in the consultation the train companies proposed that 'Welcome Points' would be developed at stations as an initial focal point that provides any customer who needs support or advice a place to start their journey in the absence of a ticket office. We thought there was merit in this idea but there was much that needed to be developed.

Welcome Points were not explained as part of the original consultation, so passengers had not had the opportunity to comment on these plans or to highlight potential concerns. We felt it was important that there was further engagement with disabled people and representative groups on the concept, design and implementation of Welcome Points. We also believed that before any changes to ticket offices were made they should be piloted to establish what works best at different types of stations and to gather passenger feedback.

### Access to rail products

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

### Retail capacity and formal monitoring

We were not satisfied at some stations that there are sufficient alternative retail

options, typically ticket vending machines, to ensure that passengers could still purchase a ticket without a risk of excessive queues.

We felt that queuing time targets, monitoring and reporting for ticket vending machines (based on those currently in use at ticket windows) should be implemented to give passengers assurance before any changes take place. If queues exceeded the targets then action would need to be taken, such as issuing staff with hand-held ticket devices so that they could 'queue bust' or installing extra ticket vending machines.

#### Robust monitoring and review

We did not think there had been enough focus in plans on reviewing and monitoring changes should they go ahead. There needed to be a robust review mechanism based on research with passengers and a common and publicly available set of specific core metrics, including queueing time metrics, designed to monitor the impact. This needed to be in place before any changes were made to ensure they were working for passengers.

#### Future regulation

The public consultation feedback highlighted widespread concern that if ticket offices were closed and existing regulations for ticket offices no longer applied, there would be no ongoing requirement to consult on any future changes. Many passengers feared that train companies would make further cuts to staff if existing regulations were removed.

The rail industry suggested that the existing Accessible Travel Policy (ATP) process, which is formally regulated and enforceable by the Office of Rail and Road as part of an operator's licence, could provide an alternative. We thought this could be an option but that it may require modifications to the ATP guidance. The key requirement was a commitment (and process) to consult on specific changes to staffing at a station, at both an individual station level and wider. We also thought there was 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.

Transport Focus believed there needed to be a commitment to a process for any future material changes in staffing at a station before any changes to ticket offices could go ahead.

### **3. Consultation process**

The procedure for making a major change to ticket office opening hours is set out in 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 London TravelWatch.

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

Concerns about the consultation process were raised, especially over whether people (and especially disabled people) had adequate information on which to comment and over the short consultation period. We note that train companies subsequently made proposals available in alternative formats and published Equality Impact Assessments. We had previously written to each train company requesting they make this information available. The consultation period was also extended by the train companies to 1 September, giving people longer to respond.

Transport Focus then had until 31 October to reply to each train company. Under the terms of the TSA, Transport Focus is able to object to train company proposals based on criteria relating to quality of service, cost effectiveness and widespread and easy access to rail tickets and products.

Transport Focus and London TravelWatch engaged two external suppliers to help process and log responses to the consultation: Ventrica and Greens Digital. The assessment and analysis was carried out by internal staff.

### **4. Responses to the consultation**

During the consultation period Transport Focus received a total of 585,178 responses by email, webform, freepost and phone. Some were specific to individual stations, some were specific to train companies as a whole and some were at a national level objecting to the proposals by all train companies. We also received many responses from stakeholders including MPs, local authorities and representative organisations. More detail can be found in Appendix 1.

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.

The top three issues in these responses were concerns over the ability to buy tickets in future (including difficulties in using Ticket Vending Machines), the provision of information needed to plan journeys (including during periods of disruption) and how passengers requiring assistance would receive help and support. The common theme running throughout responses was the role, and value, of staff in delivering all of these. We analysed these responses and used them to help inform our decision on whether to object to the proposals for stations in our operating area.

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. Demographic survey of consultation respondents**

The train companies' consultation under the TSA only requires them to provide Transport Focus's contact details so that passengers can make representations. One of the disadvantages of this method of gathering responses is that it means Transport Focus cannot easily capture information which might support analysis of the different concerns and priorities of different types of respondents. The short time allowed, under the TSA process (unless extended), for Transport Focus to respond to train companies also limits the depth of analysis that can be undertaken.

In order to provide assurance that the train companies' consultation had reached a wide range of passengers and potential respondents Transport Focus conducted a survey of a sample of people who had responded to the public consultation. We emailed asking them to complete an online questionnaire collecting their demographic details. The survey closed on Thursday 21 September with 4156 people having completed a questionnaire.

Key findings from the demographic survey included:

- Responses tended to be from older train users; almost a half of those responding were more than 65 years of age.
- 58 per cent of the responses were from female train users, while 40 percent were from those who are male.
- Almost seven in 10 respondents used trains at least a few times a month.
- More than nine in 10 of those submitting a response to the consultations used trains to make journeys for leisure reasons and almost one in four used trains to make journeys to or from work or education.
- 20 per cent of those submitting a response said that they have a long-term physical or mental health impairment limiting the daily activities or work that they can do. Of these respondents:
  - 58 per cent have a mobility impairment

- 20 per cent have a mental health impairment
- 18 per cent have a hearing impairment
- 14 per cent have a visual impairment
- 8 per cent have a cognitive or learning impairment.

The full demographic survey report is available on our [website](#).

## 6. Criteria to assess train company proposals

Under the TSA, changes to opening hours may be made under the major change procedure if:

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

Transport Focus can object to a proposal on the grounds that the change does not meet one or both of the criteria above. If we object, the train company can either withdraw their proposal or refer it to the Secretary of State for Transport for a decision. The Department for Transport has published [guidance](#) setting out the approach the Secretary of State would take in these circumstances.

We believed it was important that there was as much transparency as possible surrounding the process and Transport Focus's role within it. To that end Transport Focus published broad [criteria](#) to assess the proposals received. These contained many of the same themes set out in the Secretary of State's guidance document. Our view was that any proposal must set out how these passenger expectations would be met in future.

- **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.

These provide an outline of the broad areas that were considered for each train company. Transport Focus centred its assessment on the impact of the proposals on passengers and whether, in accordance with the terms of the TSA, they represented 'an improvement on current arrangements in terms of quality of service'.

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

Finally, our assessment of the proposals also drew on the findings of Transport Focus's own research *Passenger views on rail ticket retailing - their experience and attitudes to change*, conducted in December 2021. This research explored passengers needs and views on retailing at stations and on potential changes to ticket offices. The research summary and research agency report are available on our [website](#).



## Appendix 1

### Breakdown of consultation responses received by Transport Focus

Transport Focus received a total of 585,178 responses to the train companies' consultation. These were classified as 'objections', 'supportive' or 'neutral'.

In total Transport Focus received 583,166 objections to the proposals, 721 representations supportive of the train companies' proposals and 1291 'neutral' representations which were not clearly objecting to, or supportive of, the train companies' proposals.

A detailed breakdown by train company and station can be seen in the individual [responses](#) to each train company. A brief overview is available below.

### Objections received

Number of objections by train company

Avanti West Coast	47,871
c2c	29,968
Chiltern Railways	28,063
East Midlands Railway	35,165
Govia Thameslink Railway	40,171
Greater Anglia	39,518
Great Western Railway	57,825
London North Eastern Railway	35,729
Northern	60,339
South Western Railway	41,975
TransPennine Express	35,380
West Midlands Trains	37,977
Total	489,981

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.

## Supportive representations received

Number of supportive representations by train company

Avanti West Coast	37
c2c	33
Chiltern Railways	16
East Midlands Railway	45
Govia Thameslink Railway	40
Greater Anglia	35
Great Western Railway	100
London Northeastern Railway	32
Northern	90
South Western Railway	59
TransPennine Express	11
West Midlands Trains	48
Total	546

Transport Focus also received a further 175 responses supportive of the proposals nationally which were not attributable to a specific station or train company.

## Petitions

We also received a total of 257 petitions objecting to the proposals, including 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-ticketoffices>

We were 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>

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

Transport Focus is the operating name of  
the Passengers' Council

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