

Transport Focus, Albany House,
86 Petty France, London SW1H 9EA

Mike.hewitson@transportfocus.org.uk
0300 123 0830
www.transportfocus.org.uk



West Midlands Trains

(by email)

9 February 2024

Dear 

Feedback on ticket office proposals

On 5 July 2023 West Midlands Trains, along with 12 other train companies, launched a consultation on proposals to close ticket offices. The public consultation was extended and closed on 1 September. West Midlands Trains' notified Transport Focus of changes to the proposals on 13 October and agreed an extension of the deadline for Transport Focus to respond from 31 October to 28 November. On 31 October Transport Focus's objected to the proposals to close ticket offices made by 11 train companies. West Midlands Trains then withdrew their proposals before Transport Focus could formally assess them against our published criteria (see Annex 1).

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 – for example, 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 37,977 objections to West Midlands Trains'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 2.

We also received 48 representations supporting West Midlands Trains'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 Ticketing & Settlement Agreement 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.

Outline feedback on West Midlands Trains's proposals

You have requested feedback on West Midlands Trains's revised proposals. Though these proposals were withdrawn before they could be formally assessed, we welcome the opportunity to provide outline feedback to help you understand and respond to passengers' concerns.

It is important to acknowledge that West Midlands Trains' made considerable revisions to your proposals. The revised proposal received by Transport Focus on 13 October was an improvement on the original proposal in the public consultation. The key change was a significant increase, compared with the original proposal, in staffed hours at some stations and a reduction in the reliance on 'Mobile Teams'.

We welcomed the constructive engagement we had with West Midlands Trains on the original proposals. We also recognise that the revised proposal was much improved and may – if implemented - have improved some aspects of the customer experience at some stations. However, we still had significant concerns about the proposals overall, and their impact on the quality of service for passengers, which I will briefly summarise in turn.

Station staffing

West Midlands Trains proposed changes at 87 stations in total, of which 81 were within the remit area of Transport Focus (the remaining six were covered by London TravelWatch). The original proposals submitted on 5 July were for ten stations to become staffed Customer Information Centres (CICs) with the remainder of stations being covered by mobile teams. It was suggested that mobile teams coverage could potentially be extended to stations that are currently unstaffed. Mobile Teams were to be based from CIC's and deployed where required and in line with operational priorities. It was not clear to passengers in the public consultation when and for how long mobile teams would attend each station.

The revised proposals saw an extension of the concept of CICs to 24 stations (out of 81). Staffing hours would not be reduced at these stations. The remainder of stations would be covered by mobile teams. It was indicated that at some stations this could lead to an increase in staffed hours, but at other stations there would be a reduction and we understood that some stations would not have any planned staff coverage by mobile teams.

Where staffing hours were reduced it is very unlikely we could have been satisfied that the proposals represented an improvement for passengers requiring assistance, information, advice or for passengers' perceptions of personal security. We also had concerns about the proposed use of mobile teams, and the lack of certainty this provides for passengers as to whether staff would or would not be present at the station. This lack of certainty would likely to be felt most

acutely by passengers relying on staff to provide 'turn up and go' assistance at the station including with journey planning and moving around the station.

'Welcome Points' proposals

In response to concerns raised in the consultation West Midlands Trains, like other train companies, proposed that 'Welcome Points / Zones' 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

We understand that at some stations retail equipment would have been retained so that in principle the full product range could still have been purchased at the station during the same hours as now. However, we would have required more information about how this would work in practice, for example where to go and which staff to approach, to understand how passengers might have been impacted.

Where staffing was to be provided by 'mobile teams' it seems unlikely that we could have been satisfied that passengers would continue to enjoy widespread and easy access to the purchase of rail products. We had concerns about the availability of key products, which may not have been available to purchase from ticket vending machines, 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

At some stations we had concerns about whether there were 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 recent process whereby train companies 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.

I hope you find this feedback helpful. We remain happy to continue to engage with West Midlands Trains on this important issue to ensure that passengers' needs and their feedback is considered when West Midlands Trains is developing plans for stations.

Yours sincerely

Mike Hewitson
Head of policy

Annex 1 – Transport Focus criteria to assess train company proposals

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

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

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

We 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.

Annex 2: Total objections received for West Midlands Trains

Station specific objections:

Acocks Green	129
Adderley Park	6
Aston	16
Berkswell	32
Bescot Stadium	1
Birmingham Snow Hill	32
Blake Street	28
Bletchley	162
Bournville	77
Butlers Lane	14
Canley	37
Chester Road	56
Coleshill Parkway	78
Coseley	200
Cradley Heath	68
Droitwich Spa	124
Duddeston	2
Dudley Port	22
Erdington	55
Five Ways	23
Four Oaks	99
Gravelly Hill	26
Great Malvern	287
Hagley	46
Hall Green	48
Hampton In Arden	8
Hamstead	21
Hartford	178
Jewellery Quarter	7
Kidderminster	338
Kings Norton	92
Langley Green	10
Lea Hall	60
Leighton Buzzard	338
Lichfield City	183
Lichfield Trent Valley	73
Long Buckby	32
Longbridge	49
Malvern Link	251
Marston Green	275
Milton Keynes Central	243
Northampton	443

Northfield	101
Nuneaton	245
Old Hill	11
Olton	47
Perry Barr	14
Redditch	94
Rowley Regis	116
Sandwell & Dudley	67
Selly Oak	100
Shenstone	9
Shirley	41
Small Heath	11
Smethwick Galton Bridge	23
Smethwick Rolfe Street	9
Spring Road	17
Stechford	52
Stourbridge Junction	618
Stourbridge Town	129
Stratford Upon Avon	151
Sutton Coldfield	109
Tame Bridge Parkway	85
Tamworth	202
Telford Central	301
The Hawthorns	13
Tile Hill	26
Tipton	23
Tyseley	13
University	50
Walsall	214
Wellington	175
Widney Manor	15
Winsford	48
Wolverhampton	257
Wolverton	36
Worcester Foregate St	184
Worcester Shrub Hill	80
Wylde Green	54
Yardley Wood	95
Total	8104

In addition to the 8104 station specific objections listed above Transport Focus also received 29,873 responses objecting to West Midlands Trains's proposals in general.

Total West Midlands Trains objections: 37,977

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 Travel Watch 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 West Midlands Trains's proposals:

Acocks Green	82
Berkswell	27
Bournville	317
Great Malvern	59
Kings Norton	382
Northfield	175
Olton	318
Redditch	232
Shirley	45
Wellington	1868
Widney Manor	152
Worcester Foregate St	529
Yardley Wood	24

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-ticketoffices>

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.