



# Consultation on changes to ticket office arrangements from England's Economc Heartland sub-national transport body

# Response to Transport Focus and London Travel Watch via the following e-mails:

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### Introduction

England's Economic Heartland (EEH) is the sub-national transport body for the region from Swindon and Oxfordshire across to Cambridgeshire and from Northamptonshire to Hertfordshire. We identify and advise government on the strategic transport priorities which will support economic growth and net zero in the region.

The rail network provides important connectivity across the region, and our transport strategy and supporting evidence base shows that improved rail connectivity is a key factor in enabling a decarbonised transport system. Customers living and businesses operating in our area need to have confidence in being able to use the train easily and as part of an integrated transport network. As part of that, they need the right assistance in place at stations to enable them to fully understand ticketing, train service options and get the right help when needed is a part of this.

### **Context and current EEH position**

It is noted that the proposals for ticket office changes are being led by each train operator. These have set out specific proposals for each station with the stated aim to make staff more visible and accessible for passengers.

Given the large rail network within the EEH area, several operators manage stations including Chiltern Railways, East Midlands Railway, Greater Anglia, Great Western Railway, LNER, London Northwestern Railway and ThamesLink, with all setting out different specific proposals for changing ticket office arrangements. We also have a number of longer-distance operators who also use these stations, and customers need to be assured that they will have a consistent and high-quality service whichever train operator they use. Residents and businesses in the EEH region also often use ticketing facilities in nearby key rail hubs, such as the London terminals, both for longer-distance rail services, as well use of the Transport for London network.

We recognise that the train operators extended the original 21-day consultation period specified in the Ticketing and Settlement Agreement (TSA), following extensive feedback received during this period. We also note that Transport Focus and London Travel Watch will be analysing all consultation responses to inform their formal view on whether the proposals would be an improvement on current arrangements and ensure continued access to rail ticketing products. However, the extension coincides with the summer period when many people are away, and when key stakeholder, partnership and democratic meetings do not take place. Therefore, we do not believe consultation timescales reflect the importance of putting customers first, allow rail operators full opportunity to communicate changes with the communities they serve, or provide sufficient time for impacted parties to analyse the options being put forward to determine their impact in any detail. In short, we do not believe that such major changes should be progressed without further and wider engagement with local communities affected.

This wider engagement should include further discussion and review by democratic representatives from local authorities, ensuring that they fully understand the impacts of proposed changes on the communities they serve. The Williams-Shapps Plan for Rail, completed in 2021, identified a number of key problems with the rail system, including that it, 'often loses sight of its customers' and that 'it is missing opportunities to meet the needs of the communities it services.' Every effort should therefore be made to ensure that proposed changes are well communicated so that it is clearly understood how proposals are being designed to help maximise the ability of customers to use the railway.

England's Economic Heartland's Strategic Transport Leadership Board is a partnership of Leaders and Members from local transport authorities across the EEH region. The Board meets regularly and is the opportunity for train operators, Rail Delivery Group and/or Transport Focus to meet directly with those democratically elected representatives. Going forward and where appropriate to do so, EEH would like to see greater engagement between the rail industry and the Board. Discussions with the Board will help shape better outcomes for local residents and businesses and allow both EEH and individual local authority partners to have greater clarity on proposals being developed.

Given the points noted above, rather than comment on the specifics relevant to each station, we set out below some key principles on selling of tickets and providing assistance that we think should guide delivery of a customer focused rail network within our area. These have been developed in engagement with our local authority partners, some of whom will also be responding direct on more specific issues impacting on their areas.

<sup>&</sup>lt;sup>1</sup>Williams review quoted in the Williams-Shapps Plan for Rail at: <a href="https://www.gov.uk/government/publications/great-british-railways-williams-shapps-plan-for-rail">https://www.gov.uk/government/publications/great-british-railways-williams-shapps-plan-for-rail</a>

### Key issues and principles for consideration

## Passenger safety, security and assistance

Passengers using the railway need to feel confident in being able to use rail services, including at stations. A key influencing factor in perception of safety is the number of staff visible on the network, but there is also a need for these staff to be easy to contact, both before and after ticketing lines at stations so that customers can get assistance when they need it.

Unfortunately, many smaller and rural station have limited staff presence, or for only certain times of the day. This can add to a feeling that there is not enough supervision of the network, especially if members of staff are required to perform several duties. Staff can often provide a high level of customer service, but there may be pressure to perform multiple tasks and help passengers at the same time. Whilst it is noted that some operators have proposed 'mobile teams' to help passengers across the network, including where stations currently have no permanent staff presence, it's not fully clear how these will operate, for example how long they will spend helping passengers at each station and how they can be contacted by passengers if not currently at a particular station.

Principle 1: Any proposed changes need to consider the issues of passenger safety, security and assistance carefully- all passengers, including those needing additional assistance due to disability and/or mobility issues should easily be able to access help and support when using stations on the rail network.

### **Selling ticketing products**

It is acknowledged that an increasing number of tickets are sold outside of stations, particularly through various digital platforms. However, many customers still use staff in stations to seek advice on ticketing, as well as deal with more complex ticketing needs such as provision of season tickets, multi-route/ operator tickets, refunds, split-ticket options, various rail card and group discounts. The complexity of rail ticketing is well documented: Williams-Shapps Plan for Rail noted that, 'the Ticketing and Settlement Agreement comes in at 922 pages, so it is no wonder that passengers find ticket pricing so confusing.' <sup>2</sup> Within EEH we also have a number of stations used significantly by visitors and tourists, such as Oxford, Cambridge and Bicester Village, who play a vital role in the UK economy but who often also need particular assistance on ticketing options.

Should there be a shift to more of a reliance on ticket vending machines at certain stations associated with ticket office changes, we believe that as a minimum many of the existing facilities will need upgrading. In particular, there will need to be assurance there are sufficient facilities to meet customer demand at each station. Ticket machines need to be customer focused and able to sell the same range of tickets as at existing manned ticket offices. In particular, they should:

- Cope with increased use and operate reliably without breaking down, for example failing to accept cash or giving change;
- Sell annual season tickets (if needed with staff authorisation);
- Sell tickets for travel on another day;
- Sell the relevant range of tickets applicable to the particular station, including for different operators, and corporate discount and combined rail/ bus tickets if needed;
- Provide information on relevant ticket price options for travel to particular destinations;

<sup>&</sup>lt;sup>2</sup> https://www.gov.uk/government/publications/great-british-railways-williams-shapps-plan-for-rail

- Be located to allow easy access for all, including those with mobility issues;
- Provide relevant railcard discounts on ticket purchases; and,
- Be consistent in terms of ease of use across the rail network.

Importantly, staff assistance should be available to help passengers to use these machines if needed, particularly for those that may have difficulty using certain technology and/or understanding the different ticket options. Another relevant aspect here is the trends in use of rail post-COVID restrictions, both in terms of building up patronage, but also a shift in use of different reasons for rail travel, such as more leisure travel. <sup>3</sup>Such users tend to be more infrequent users of rail services, who may need further assistance with aspects such as ticketing. Options to sell multi-modal ticketing, for example for bus and coach services should also be considered in making any changes, for example the introduction of the 'customer service centres.'

Principle 2: Any shift to provision of electronic vending machines over provision of manned ticket offices should ensure that the same range of ticket products are still available, and that customers are clear on where they can seek assistance on ticketing options and machine operation if required. Busy stations in particular are still likely to need relevant staff presence, for example through provision of 'customer service centres' to assist with more complex ticketing needs.

### Passengers with particular accessibility needs

Using stations can be a particular challenge to passengers who require extra assistance. Station ticket offices currently provide passengers a location where they can ask for help, including onward assistance for their journey if needed. Without ticket offices, the process could be more difficult for staff and passengers, with a danger that communication could break down, including assistance not being ready for passengers on their arrival at their destination.

Another area of concern is ensuring that those passengers with disabilities such as visual or hearing impairments, or other particular needs are provided with the right assistance at the right time as they make their way through stations. Whilst we recognise that some operators are looking at new digital models to help particular passengers, for example, use of tools such as 'Whats App' for real-time passenger assistance, we don't think that this will be sufficient to help all those wishing to seek assistance, for example for those can't or are not able to use digital/ phone technology. The stated overall aim of proposals to have more staff on-hand to assist such passengers is to be welcomes, but such changes should be underpinned by more detailed assessments of differing customer needs such as through an Equality Impact Assessment (EIA). Any EIA should be subject to the right level of scrutiny before being adopted. EIAs will need to both take account of the assistance offered at each station, but also the design and layout of stations, recognising that not all stations are currently set up well for those with particular needs. This will help ensure that measures are planned to put the right help in place at the right time for all rail users.

Principle 3: Any changes to ticket office facilities should not disadvantage those with particular accessibility needs, or who are not able to use relevant technology. The impacts and opportunities to help such customers should be thoroughly assessed and reported before any changes are made, for example through use of appropriate Equality Impact Assessments.

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<sup>&</sup>lt;sup>3</sup> https://dataportal.orr.gov.uk/statistics/usage/passenger-rail-usage/ and https://media.gbrtt.co.uk/news/rail-commuting-up-8-percent-as-strikes-impact-reduces

### Having a focal point for help on stations

London Travel Watch undertook research in 2016 on the impact of closure of ticket offices across London Underground<sup>4</sup>. Whilst it is recognised that this network is not directly comparable with the wider rail network, the research findings provide real world feedback on passenger experience without ticketing offices in place. One of the key findings from the Travel Watch research was that passengers, particularly those with particular needs, can find stations chaotic without a defined place to find staff or ask for assistance. This was previously provided by the ticket office, but without these in place it was not always clear where assistance could be obtained.

The train operator consultations include some proposals for replacement of ticket offices with 'customer service centres' within our area. These have the potential to provide the focal point for assistance, particularly in busier stations. However, we believe that care should be made to ensure that when planning these centres there should be a focus on customer needs. An important part of this will be ensuring staff presence is at least as good as that offered at present, as well as ensuring:

- that they are clearly visible for all passengers arriving at stations;
- that they are consistently branded across the network;
- that a wide range of assistance is provided, including for those with particular needs; and,
- that guidance on ticketing options for all passengers is still able to be provided, including help with using ticketing machines if needed.

Where 'customer service centres' are not planned, train operators should consider carefully how passengers can seek assistance from staff from all stations across the network. This should include staff presence at busy times of station operation and provision of passenger 'help-points' or similar at visible points within the station where train operator staff can be contacted for assistance. Staff training will be key as part of this, ensuring that they have the multiple skills required to support customers, for example those with particular needs, as well as providing ticketing advice. It's also important that rail operators provide a consistent approach to how customer service is provided, particularly at busy stations, for example ensuring staff roles are well defined and those helping are easily identifiable so that customers can ask for assistance easily and quickly. Innovations that assist customer experience at stations could also play a role, building off best practice developed through relevant trials such as at Bristol Temple Meads.<sup>5</sup>

Principle 4: Changes to provision of ticket office facilities should not lead to confusion or lack of clarity on provision of help to passengers using the rail network. In particular, passengers should be clear on how to get required assistance at focal points within the station.

### Conclusion

England's Economic Heartland recognise that whilst shifts in ticketing purchases may require some changes to the design and staffing arrangements at stations, there is the concern from many of our residents and local authority partners regarding the detail of these proposed changes. As noted above, we are also concerned about the way that these proposals have been communicated and consulted upon, believing that further and wider engagement is needed from the train companies with communities impacted before major changes are made.

<sup>&</sup>lt;sup>4</sup> https://www.londontravelwatch.org.uk/publication/london-travelwatch-review-of-ticket-office-closures/

<sup>&</sup>lt;sup>5</sup> https://cp.catapult.org.uk/opportunity/station-innovation-zone-innovation-funding-programme-year-two/

Notwithstanding these points, we wish to ensure that any changes are underpinned by a key set of principles as set out above which put rail passenger needs at the heart of any changes. Finally, we recognise that ticketing arrangements are only one part of ensuring improved passenger journeys on the rail network, with costs of travel, service provision and integration with other modes of transport also key considerations. We wish to continue to work collaboratively with the rail industry to achieve such benefits for the communities we represent across our area.