



Policy Submission

Ticket Office Closure Consultation – Response from the National Union of Rail, Maritime and Transport Workers (RMT)

Executive summary

- The proposals from the train companies would lead to nearly 1000 ticket offices being closed. Despite the spin from the Government and Train Companies that their proposals are about 'getting staff from behind the glass' this is a mass de-staffing of stations. 2300 station staff jobs are at risk of redundancy as a result of these plans, which is nearly a quarter of all station staff at these companies.
- RMT believes that at all stations where it is proposed that ticket offices will close (or hours will reduce) these plans represent a significant detriment for passengers compared to current arrangements. For instance, Northern is proposing to reduce station staffing provision by nearly 6500 hours a week; at 16 of East Midlands Railway's 29 stations that currently have ticket offices, there would no longer be any guaranteed staffing hours; Avanti is proposing to reduce its ticketing assistance hours at its 19 stations by 350 hours a week.
- Under these proposals, passengers will no longer easily be able to buy the right ticket for their journey.
- Passengers requiring assistance will no longer receive this in a timely and reliable manner, and 'Turn up and go' will be a thing of the past.
- It will be more difficult for passengers to get information required for their journeys at stations, including during disruption.
- Passengers will feel less safe and secure at stations.
- There will be significant confusion for passengers about whether they may be penalised if they can no longer get the ticket they require at a station.
- Access to facilities at stations will be significantly restricted or even withdrawn.
- Importantly, as the arrangements governing ticket office hours are the only statutory regulation of station staffing, if the train companies are allowed to go ahead with these plans, there is nothing to stop them making even more cuts to staffing, facilities and stations in the future.
- Therefore, the proposals by 13 train companies to close ticket offices (or reduce hours) must be rejected in their entirety by Transport Focus and London Travelwatch.

Introduction

The National Union of Rail, Maritime and Transport Workers (RMT) is Britain's largest specialist transport union. RMT has more than 80,000 members from almost every sector of the transport industry. RMT is by some distance the largest rail union and represents all grades of rail workers. Thousands of our members work in the ticket offices impacted by the train companies' proposals.

RMT is opposed to the closure of nearly 1000 ticket offices (and reduction in hours at ticket offices) at Avanti West Coast, C2C, Chiltern, East Midlands Railway, Greater Anglia, GTR (Great Northern, Thameslink and Southern), Great Western Railway, LNER, Southeastern, South Western Railway, West Midlands (including London Northwestern Railway), Transpennine Express and Northern.

The passenger watchdogs are required to provide a separate response to each train companies' consultation, assessing the impact for each station where there are changes proposed in relation to a broad criteria¹ which covers whether under the proposed changes, passengers can still: easily buy the right ticket for their journey; receive assistance in a timely and reliable manner; get the information they require, including during disruption; feel safe at a station; are not penalised if they cannot buy the ticket they need from a station and can continue to use facilities at a station. RMT's belief is that at every station where the train companies are proposing to close the ticket office (or reduce ticket office hours) the proposals will represent a detriment for passengers in relation to these criteria. Therefore, this must result in Transport Focus and London Travelwatch objecting to the proposals at all of these stations in their entirety.

Flawed public consultation process

Before setting out RMT's detailed objections to the proposals, we wish to highlight our significant concerns about the process itself and how this has failed to ensure that the public can engage in a meaningful, informed and accessible way. We believe it is clear that the process set out in the Ticketing and Settlement Agreement (TSA) was never envisaged to be used for mass ticket office closures and was instead intended to deal with changes at individual stations.

Firstly, the structure of the consultations is confusing and fragmented. There are two passenger watchdogs, thirteen train operating companies and 25 different email addresses involved in the consultation. Numerous email addresses may make it easier for responses to be processed, but it certainly does not make it easier for passengers to object to the proposals. We note that London Travelwatch established an email address for passengers to object to all closures in its area, but Transport Focus did not do so until much further into the consultation period. The result of this is that there is no easy and simple way for passengers to object to all ticket office closures. Whilst we understand that many people may wish to raise particular concerns about the impact on their local ticket office/s, there are many that also would want to object to closures in their entirety. There is also no central list of ticket offices covered by the proposals, leaving passengers to attempt to wade through train company websites to try and find this information.

As Transport Focus and London Travelwatch will be aware, in early 2022, following a 'confidential' and 'targeted' consultation, the Government changed its guidance on how it deals with applications from train companies for ticket office closures, with the result being that the 12 transactions an hour 'busy' threshold was removed from this process. This means that ticket offices which were previously deemed 'busy' and therefore not normally permitted to close, could now be closed under the new process. We believe that the purpose of this change was to pave the way for mass ticket office closures and avoid the parliamentary scrutiny of legislative changes to the Ticketing and Settlement Agreement. Of significant concern is that the Government refused to

¹ <https://www.transportfocus.org.uk/publication/transport-focus-role-in-assessing-major-changes-to-ticket-office-opening-hours/>

hold a public consultation² over changes to the guidance, thus denying passengers the ability to have their say on this matter before train companies submitted applications for ticket office closures under the new process, despite the significant ramifications for passengers of the changes to the Government's guidance.

It is clear that these proposals have been on the Government and train companies' agendas for well over a year, and indeed throughout negotiations with the RMT as part of our national dispute, the train companies have been explicit about their intentions to close all ticket offices. In a letter to the RMT sent on 5th July 2023, Steve Montgomery, Chair of the Rail Delivery Group (RDG) confirmed that the DfT had approved the train companies' plans to put proposals for ticket office closures out for public consultation.

The train companies' contracts with the Government also show that in July 2020, the Government established a project with the RDG centred on 'modernising retail' including closing ticket offices, and that the contracts signed from September 2020 include obligations on the train companies to deliver this work.

Despite this, the Government and Train Companies have, and continue to be, dishonest in their portrayals of their plans to the public, clinging to the lines that this is about 'modernising' ticketing and 'getting staff from behind the glass screen'. This makes it hard to see how the public are getting a real opportunity to give informed feedback on the proposals.

The Gunning principles state that public consultations are only legitimate when: proposals are still at a formative stage; there is sufficient information to give 'intelligent consideration'; there is adequate time for consideration and response and 'conscientious consideration' must be given to the consultation responses before a decision is made. Our view is that none of these principles will be met via this process.

Indeed, we believe it is demonstrably clear that rather than being at a formative stage, the train companies are behaving as if their proposals are a fait accompli. On the day that the public consultations were announced, the train companies issued s188 redundancy notices to the RMT, putting 2300 station staff jobs at risk of redundancy as a direct result of their ticket office closure proposals. This is around a quarter of all station staff jobs at these companies. Despite the fact that the public consultation is ongoing, the train companies have proceeded with staff consultation meetings and briefings to staff on their new arrangements, as if they are confident that they will be given the go-ahead to proceed with their proposals. We are aware that at least one train company, Avanti West Coast, is already proceeding to make arrangements for letting agents to put their ticket office spaces out for rent.

There was, understandably, significant public concern raised about the 21-day consultation timescale period being inadequate, and RMT fully shared these concerns. That hundreds of thousands more consultation responses have been received since the consultation deadline was extended to 1st September demonstrates that 21 days was a completely insufficient timescale for passengers to give their views. In our view, the consultation extension, whilst undoubtedly necessary, does not mitigate against the other shortcomings of the process. We would expect the watchdogs to address these issues in their response to the consultations.

² <https://questions-statements.parliament.uk/written-questions/detail/2022-05-10/197>

Misleading messaging

There is no consistency in the train operators' proposals nor in their messaging, which has been opaque and misleading throughout. Every single train company has used different phrases to describe the consultations on their websites, and only three train company website home pages are actually explicit that the consultation is about ticket office closures:

- Avanti - 'Public consultation on ticket office closures'
- Chiltern - 'Public consultation on Chiltern Railways ticket office change'
- C2C - 'C2C consultation on ticket office closures' (on rolling banner on homepage, so not always visible)
- East Midlands Railway - 'Modernisation consultation'
- Greater Anglia - 'Consultation on proposed ticket office changes'
- GTR Thameslink/Great Northern/Southern - 'Public consultation: Find out about the proposal to move ticket office colleagues from behind ticket windows onto the station concourse and how to feedback.'
- GWR - 'Ticket office consultation – Have your say on industry proposals'.
- LNER - 'Our stations are changing. Read about how we're transforming our stations and have your say on the proposed changes in our travel centre consultation' which was then changed to 'Public Consultation Extended – final opportunity to have your say on proposed Ticket Office closures along our route'.
- Northern - 'Public consultation – Proposed changes to ticket offices, find out more about the consultation'.
- Southeastern - 'Ticket office consultation. Find out more'.
- SWR - 'Station Change Proposals. Modernising our retail offer'
- TPE - 'Ticket office consultation. Have your say on the proposed changes to staffed ticket offices'
- West Midlands - 'Consultation announcement. Proposed changes to ticket offices'.

Many passengers, and groups representing disabled and older people have raised concerns about the adequacy of the posters on display in stations, often these are not in prominently displayed positions, nor are they written in accessible formats.

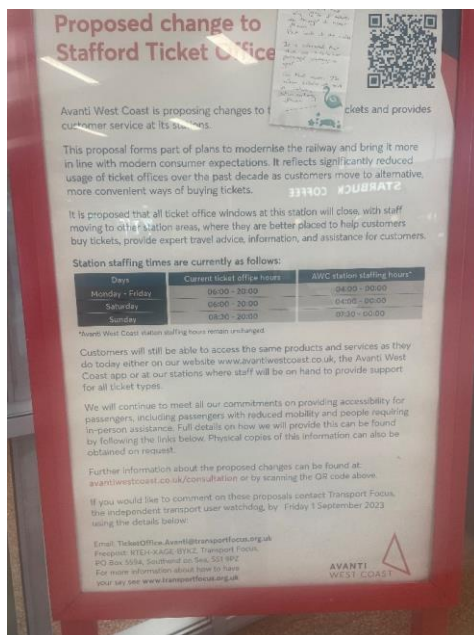
We have already written to the watchdogs to flag our concerns that staff at numerous train companies had been instructed not to display or distribute materials aimed at enabling passengers to engage in the consultation, such as posters and postcards. In addition to this, staff at LNER have been threatened with disciplinary action for wearing badges in support of keeping ticket offices open. Again, this can only be construed as a concerted attempt to prohibit passengers from engaging in meaningful consultation, or even being made aware of the proposals.

RMT has numerous examples of where posters displayed by the train companies are misleading or inaccurate. In many cases, the train companies have failed, we believe intentionally, to draw a distinction between ticket office hours and station staffing, which can be two separate things. While in smaller stations ticket office staff may be the only staff present, at other stations, there is station staffing (such as platform, gateline or despatch staff) in addition to ticket office staffing. In such cases, retaining the existing station staffing, whilst closing ticket offices and cutting ticket office staffing would clearly be a detriment for passengers compared to the current provision.

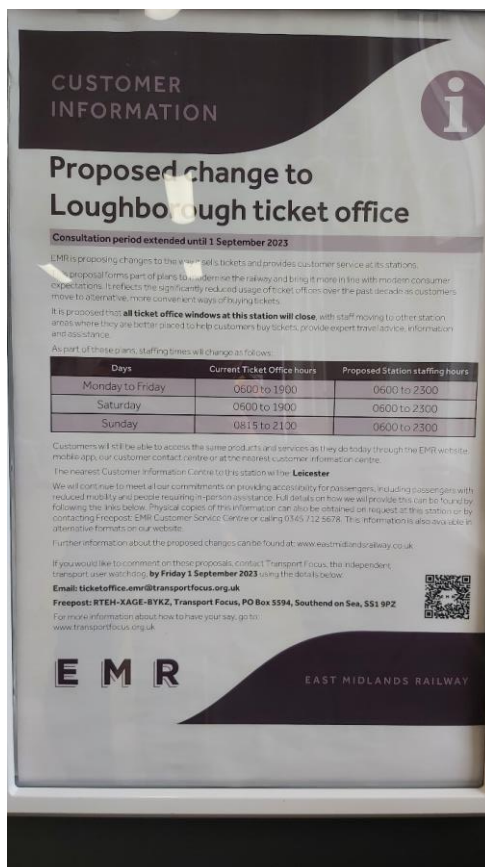
Some examples of misleading posters include:

- The posters displayed by Avanti list the current ticket office hours and the future 'station staffing hours' rather than the ticketing assistance hours (which are significantly fewer than staffing hours). This is highly misleading as it suggests that staff will be present for more time than the ticket office is currently open. Yet the reality is that the ticketing assistance hours are a cut compared to existing ticket office hours. For instance, at Stafford Station,

the poster, below, does not show that the ticketing assistance hours would actually be 07:15 – 16:00 Monday to Saturday and 09:00 – 18:00 on Sundays, a reduction of 34 hours per week compared to the ticket office. The poster also doesn't mention that the company is proposing 5.5 FTE redundancies at this station, representing 9 ticket office staff.



- At East Midlands Railway, the poster at Loughborough compares current ticket office hours to proposed station staffing hours. These are two separate things, but the vast majority of passengers would not know this. The reality is that a passenger would have to travel to the customer information centre at Leicester in order to access a fuller range of products and services.



- Again, at Witham, Greater Anglia is comparing current ticket office hours to 'proposed' station staffing hours, which suggests an enhancement in staffing provision. Yet the station already has non-ticket office staff present during the 'proposed' hours. The difference under the proposals is that passengers would have to travel to Colchester, Chelmsford or London Liverpool Street for a 'full range of products'.

Proposed change to Witham Ticket Office.

Consultation period now extended until Friday 1 September 2023

Greater Anglia is proposing changes to the way it sells and customer service is provided at its stations. This proposal forms part of plans to modernise the railway and bring it more in line with modern consumer expectations. It reflects significantly reduced use of ticket offices over the past decade as customers move to alternative, more convenient ways of buying tickets.

It is proposed that all ticket office windows at this station would close, with our staff moving to other station areas where they would be better placed to help customers buy tickets and provide support from advice, information, and assistance.

As part of these plans, station staffing times would change as follows:

Days	Current Ticket Office hours	Proposed station staffing hours
Monday – Friday	06:00 – 20:00	06:00 – 23:00
Saturday	06:30 – 20:00	06:45 – 22:00
Sunday	06:45 – 20:00	08:00 – 22:00

Customers would still be able to buy tickets from the new ticket machines and other on my website and app, and colleagues would still be available to help customers at the times outlined above. Ticketing assistance would also be available directly from Greater Anglia staff stationed in the ticket machine.

In addition, a full range of products would still be available at our Customer Information Centres in Colchester, Chelmsford, and London Liverpool Street stations.

Station opening times would not change and customers would still have access to the same station facilities they do today.

We will continue to meet all our commitments on providing accessibility for passengers, including passengers with reduced mobility and people requiring personal assistance. Full details on how we will ensure this support can be found by following the new website, printed copies of this information are also for download on request at this station or by contacting Helpline Greater Anglia Customer Relations on calling 0345 300 123 (24/7) or on the GWR website. This information is available to request on terms on our website.

Further information about the changes can be found at www.greateranglia.co.uk/consult or scan the QR code.

If you would like to comment on these proposals please contact Transport Focus at the independent group's user workshop by Friday 1 September 2023 using the details below:

Email: TicketOffice.GWR@transportfocus.org.uk
 Freepost RTFH-XAGE-BYKZ, Transport Focus, PO Box 5504, Southend-on-Sea, SS1 9PZ
 For more information about how to have your say, visit transportfocus.org.uk

greateranglia

- At Bath Spa, managed by GWR, the poster shows interim hours for the ticket office and not that the ticket office is still proposed to close by December 2024. The poster also states that physical copies of the information are available, which staff at the station report has never been the case.

Proposed changes to Bath Spa Ticket Office

GWR is proposing changes to the way it sells tickets and supports its customers at this station.

This proposal forms part of wider plans to modernise the railway and bring it more in line with modern consumer expectations. It reflects significantly reduced use of ticket offices over the past decade as customers move to alternative, more convenient ways of buying tickets.

It is proposed that all ticket office windows at this station close, with some staff moving to other areas of the station where they are better placed to help customers.

Prior to closure, the ticket office will operate to amended times with fewer windows open as shown in the table below:

Days	Station opening times		Ticket Office hours	
	Current times	Proposed times	Current times	Interim times
Monday to Friday	05:15-01:00	Unchanged	0600-2000	0630-1930
Saturday	05:45-01:00	Unchanged	0800-2000	0700-2000
Sunday	07:45-01:00	Unchanged	0745-2000	0730-2030

There are no changes to access to toilets, waiting rooms and lifts. We will continue to meet all our commitments on providing accessibility for passengers, including passengers with reduced mobility and people requiring personal assistance.

Customers will still be able to access the same products and services as they do today at gwr.com, GWR's Mobile App, our customer contact centre on 03457 000 123 or at the station through self-service machines.

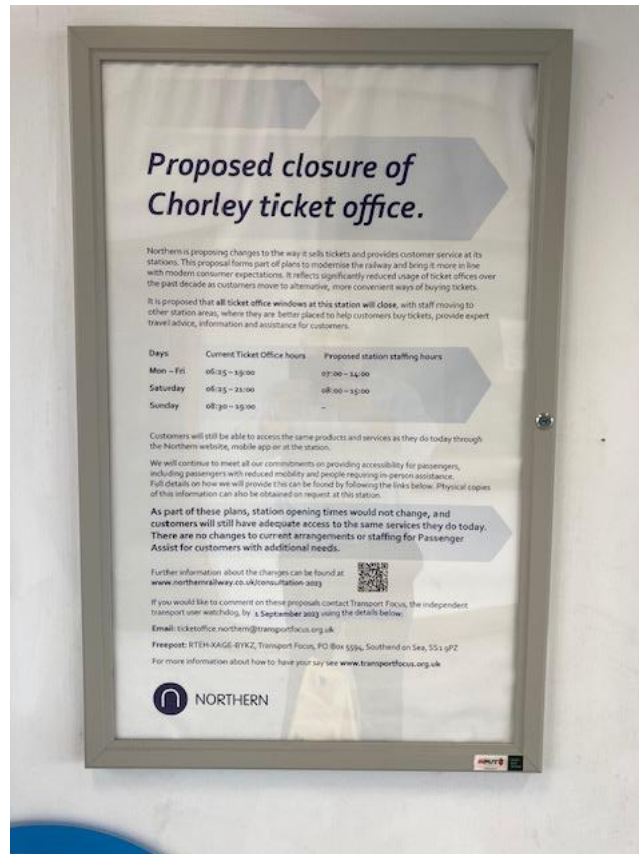
More details can be found at gwr.com/haveyoursay and physical copies of this information are being produced and will be available at this station or by calling 03457 000 123.

If you would like to comment on these proposals, contact Transport Focus, the independent group's user workshop using the details below. **The deadline for comments to be submitted has now been extended to Friday 1 September 2023.**

Email: TicketOffice.GWR@transportfocus.org.uk
 Post: Freepost RTFH-XAGE-BYKZ, Transport Focus, PO Box 5504, Southend-on-Sea SS1 9PZ
 For more information about how to have your say, visit transportfocus.org.uk

Scan Me to find out more about our proposed changes

- At Chorley station, managed by Northern, we believe the information displayed about future arrangements is very misleading. For instance, the poster states that passengers will be able to access the same products, yet our members working at the station report that various products and services would no longer be available, including, part-cash, part-card payments, purchase of railcards, refunds on tickets purchased at the station, seat reservations and issuing smart cards. The poster states that staff will be better placed to assist customers, which is simply not true, given that, at this station, it is proposed to lose 46 staff hours per week. It is difficult to see how the statement that there will be no changes to arrangements for passenger assists could possibly be true when there will be such a significant reduction in staffing presence at the station.



These are just a small number of examples of how the information being given to passengers by the train companies is deliberately misleading and opaque. How can it be considered that there has been intelligent or informed consideration when the facts are being misrepresented in such a way? We would expect the watchdogs to address these issues in their response to the consultations.

Inadequacy of the Ticketing and Settlement Agreement

At no point has there been a ticket office closure consultation of this scale and it is clear that the process set out in the Ticketing and Settlement Agreement is by no means adequate to deal with the scale of changes being proposed by the train companies. The TSA describes a major change as occurring when a train company seeks to 'change the range of Basic Products that it is required to offer for Sale at a Regulated Station or the hours during which its Ticket Office at a Regulated Station is required to be open'. We are not aware of any reference to mass ticket office closures in the TSA.

It is clear that this is a coordinated attempt by the Government and train companies to tear up Schedule 17 by the back door given that any amendments to the Ticketing and Settlement Agreement would require legislative changes. We would expect the watchdogs to address these issues in their response to the consultations.

Despite the significant shortcomings in the process, there has been widespread and overwhelming public opposition to the proposals. At the time of writing there have been in the region of half a million consultation responses, there are numerous online petitions³ with hundreds of thousands of signatures between them, there has been widespread opposition from across the political spectrum, and an extensive range of groups have spoken out against the proposals including many representing disabled and older people and women. Given that the role of Transport Focus and London Travelwatch is to put the interests of passengers first, we can't see how the watchdogs can do anything other than object to the proposals in their entirety.

What ticket office workers say

Ticket office staff know first-hand what the impact will be for passengers of mass ticket office closures and the loss of thousands of station staff jobs.

Following the consultation launch, RMT surveyed our ticket office members to gather their views on the proposals. Over 1000 ticket office workers responded:

- **97% said that closing ticket offices would make it harder for passengers to get the best value fare for their journey.**
- **98% said that closing ticket offices would worsen accessibility for disabled, Deaf and older people.**
- **98% said that closing ticket offices would worsen the quality of service provided to passengers.**
- **94% said closing ticket offices would worsen passenger safety and security.**
- **98% said that closing ticket offices would lead to a reduced presence of staff at stations.**

It is clear that ticket office staff overwhelmingly believe that the proposals to close ticket offices and cut station staffing would be negative for passengers. These workers are the knowledgeable and experienced professionals who know better than anyone the value that ticket offices and ticket office staff have for passengers and what the impact would be of the train companies' proposals. We urge Transport Focus and London Travelwatch to take their views into account when responding to the proposals.

Impact on station staffing

Despite the Government and train companies' misleading claims to the converse, the reality is that these proposals are directly aimed at significantly reducing station staffing and not about improving the passenger experience.

The true agenda is exemplified by the fact that on the day the public consultations were launched, the train companies submitted s188 redundancy notices to the RMT. Every train company involved in the public consultation is proposing reductions in station staffing as a direct result of their ticket office closures. In total, around 2300 station staff jobs are currently at risk of redundancy, equating to around a quarter of all station staff jobs at these companies. If these closures go

³ For instance, <https://www.megaphone.org.uk/petitions/cut-their-profits-not-our-ticket-offices>, <https://petition.parliament.uk/petitions/636542>, <https://act.38degrees.org.uk/act/keep-ticket-offices-open-petition> and <https://www.change.org/p/save-our-railway-ticket-offices>

ahead, there will be nothing to stop the train companies further reducing staffing in the future.

Transport Focus' document⁴ which sets out its role in assessing major changes to ticket office opening hours states that 'It is important to acknowledge 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 will be a key consideration in our assessment'. We agree that this is vital, given the value that passengers place on the presence of staff when travelling by rail. As Transport Focus pointed out in its recent evidence to the Transport Select Committee inquiry into transport accessibility 'in much of our research there is a consistent message coming through about staff: passengers like and value having staff around'.⁵

It is also important to note that in many cases, train companies have already begun de-staffing the railway by stealth, through the non-filling of vacancies. In many cases, train companies are already operating below their agreed establishment for ticket office staff. The impact of this is that train companies are in some cases failing to meet their schedule 17 requirements, and ticket office windows have been reduced. For instance, at Avanti, ticket offices have been frequently closed over the last 12 months, and when they have been open there has been significant short staffing because of a widespread failure to fill vacancies. At Northern, information published via an FOI request shows that for the first four periods of this year, on average, it met just 85% of its Schedule 17 hours. Across the four periods, over 22,000 ticket office hours were lost.⁶

As detailed above, the train companies have been consulting internally on proposed changes to staffing throughout the public consultation period, despite not formally having been given the go-ahead to proceed with their ticket office closures. This does beg the question, why are they so confident that they will be able to go ahead with their plans? We believe this is because the Government has been instrumental in facilitating the whole process.

RMT has warned from the outset that ticket office closures are first and foremost about cutting staff. The Government and rail industry have been misleading and disingenuous on this point throughout. For instance, in January 2023, Steve Montgomery, the Chair of the Rail Delivery Group told the Transport Select Committee that:

"To be clear, with a lot of booking offices we are not talking about unstaffing stations. This is one point we need to be quite clear on. It is about moving people out from behind the ticket office window on to platforms, able, hopefully, to give a greater service to customers, but you want to make sure that people are there to deal with more vulnerable individuals."

Just two months before the train companies announced their proposals, in May 2023, the Rail Minister Huw Merriman MP told the Committee that:

*"It is anticipated that **every station** that currently has somebody working behind the ticket office will still have that person, but they will be interacting with passengers on the platform, helping them to buy digitally, so that passengers are upskilled, as well as workforce."*

When questioned on the closures in the House of Commons following the launch of the public consultations, the Rail Minister stated 'I give the commitment again from the train operators that no currently staffed station will become unstaffed as a result of these changes'. This statement is highly misleading and does not reflect the scale of the cuts being proposed by the train operators.

The voice of the rail industry, the Rail Delivery Group (RDG) has made four 'pledges' relating to the proposals, one of which is 'across the network as a whole, there will be more staff available to

⁴ <https://www.transportfocus.org.uk/publication/transport-focuss-role-in-assessing-major-changes-to-ticket-office-opening-hours/>

⁵ <https://committees.parliament.uk/writtenevidence/119447/pdf/>

⁶ https://www.whatdotheyknow.com/request/stations_not_meeting_schedule_17_18#incoming-2400280

give face-to-face help to customers out in stations than there are today'. It is simply not true that staff will be more visible and available. You cannot take around 2300 staff out of the industry and say the outcome of this will be that more staff will be available.

We refer to the joint letter of objection⁷, coordinated by Transport for All and signed by around 90 organisations, including RMT, which highlights that in some cases stations will in fact become unstaffed, contradicting the Minister's assertions. For instance, at East Midlands, 16 stations would become unstaffed with just 'daily' or 'weekly' visits from mobile teams and no guaranteed hours for staff availability.

Furthermore, the cuts to staffing proposed in many cases will impact passengers as severely as if the station were to become unstaffed. For instance, at Northern, Mossley Hill station is currently open 18 hours a day Monday – Saturday and 15 hours on a Sunday. Under the proposals, there would be a 'journey maker' present at the station for just two hours a day Monday – Saturday and no-one present on a Sunday. Greater Anglia is proposing to reduce the staff presence by 7 hours a day at Waltham Cross, and to completely un-staff the station on Sundays, where the ticket office is currently open 08:15 – 15:45. South Western Railway is proposing many of its station will become unstaffed for certain days of the week. For instance, Worcester Park ticket office is currently open for 12 hours on Fridays and would become unstaffed on this day under the proposals. Similarly at Whitton, which has a ticket office open for 14 hours on Fridays and Saturdays, would become unstaffed on these days under the proposals. These cases are highlighted not as outliers but just some of the many examples of the massive cuts to station staffing that would result from these proposals being implemented. At all of these stations it is clear that what is being proposed by the train companies represents a detriment compared to current arrangements and must therefore be rejected.

Even where the companies propose that station staffing hours would remain the same as current ticket office opening hours, there are multiple reasons why this still represents a significant deterioration in the service provided to passengers, which are described in more detail further on in our response. However, importantly, any proposals for future staffing arrangements outside of the ticket office must only be considered temporary.

This is because the current legislative regime, Schedule 17, which sets out the regulated ticket office opening hours, is the only means of statutorily regulating station staffing. In many cases ticket office staff are the only staff present at a station. If these proposals go ahead, schedule 17 will essentially be torn up and there will be no more regulated staffing levels at any of these stations. The train companies might make claims now about the level of station staffing in the future, but if they are allowed to close ticket offices, there is nothing to stop them rescinding these commitments, and by then there would be no formal role for the passenger watchdogs and no accountability. In fact, the train companies themselves admit this. C2C's consultation states 'Staffing hours do not form part of our Schedule 17 commitment and may change in future years'.

As we have already flagged, the train operators and Government have been disingenuous and opaque throughout this process. The public have been consistently misinformed about the train companies' true intentions, and there is absolutely nothing to suggest that the train companies will honour the staffing arrangements they are proposing as part of this process.

Therefore, the only way to prevent a mass de-staffing of the rail network in the future, is for the watchdogs to object to all of the proposals and ensure Schedule 17 arrangements are maintained.

Transport Focus & London Travelwatch Criteria

Transport Focus' document⁸ sets out the broad criteria it will use to assess proposals. We have not seen an equivalent document from London Travelwatch so assume it will be working to the same

⁷ <https://docs.google.com/document/d/1BAXyWPHijGhivEtWapYswqwrzZGr88z9kJ8XZ86c05g/edit>

⁸ <https://www.transportfocus.org.uk/publication/transport-focus-role-in-assessing-major-changes-to-ticket-office-opening-hours/>

criteria. We set out below why we believe that the proposals will represent a detriment to passengers in relation to these criteria.

Criteria: Passengers can easily buy the right ticket for the journey they want to make. This will include 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.

"Apps don't tell customers that buying a railcard will save them money."

"I often offer people cheaper fares than they would have been charged by the machines because they either don't know what the cheapest product is or don't know how to access it."

"As an example, 3 people came along today. They all wanted travelcards, paying separately. I was able to advise them to buy a group save ticket saving them a 3rd. If they went to the machine they would have done separate transactions and have been none the wiser."

Comments from RMT Survey of Ticket Office Members

RMT firmly believe that passengers would no longer have widespread and easy access to the purchase of rail products if the ticket offices closures went ahead.

While the precise range of products available at different Ticket Vending Machines (TVMs) may vary between train operators, adding to the confusion for passengers, there are a range of products and services available at the ticket office, which are generally not available from TVMs. This includes: refunds (including immediate refunds when trains are disrupted), season ticket changes, ranger and rover tickets, ferry/bus connections, park and ride, group save, season tickets over one month in length, custom length season tickets, advance fares at some TOCs, rail card purchases, off-peak tickets before 9.30am, changes to ticket classes, seat reservations, cycle reservations, photocards for season tickets, scholar tickets, sleeper bookings, car parking, family travel cards, kids for £1 or £2 offer, ticket collection where the customer doesn't have the payment card, excesses, processing warrants and vouchers, staff discounted travel, flexi season tickets, passenger assist bookings, advance tickets, ticket on departure collections purchased via Apple Pay, London CIV tickets, plusbus tickets, tickets from London Zone 6 boundary with a Freedom Pass, printing journey information, issuing and registering smartcards, group travelcards for large groups, encode exchange season tickets, carnet tickets, through tickets to Ireland and Isle of Man, selling tickets for ticket on departure collection anywhere in the country, reprinting ticket on departure tickets following a TVM failure, processing police requests for free ticket issues.

Notably, the D34 and D50 non-railcard discounts available to blind and visually impaired people and wheelchair users are only available from staffed ticket offices, and no train company has made provision for these to be made available from stations where ticket offices are closed.

A number of train companies, including C2C, East Midlands Trains, Greater Anglia, LNER, Northern, Southeastern, TPE and West Midlands Train state that their full range of products would only be available from the small number of 'hubs' or 'customer information centres' being kept open. This would require many disabled passengers to travel significantly out of their way to get the appropriate ticket, risk boarding a train without a ticket or simply not travel at all. The other TOCs are proposing to close all of their ticket offices, so it appears as though there will be no provision for passengers to access the concessionary disabled persons' discount. All scenarios are completely unacceptable and just another example of the disdain shown for disabled people by the train companies.

Importantly, staff at the ticket office ensure that passengers get the best value fare for their

journey. Our ticket office members report time and time again that they are able to navigate the complex and fragmented ticketing system to ensure passengers do not pay more than they need to, and correct tickets brought in error online or at TVMs. Ticket office staff will advise passengers when it is cheaper to buy a railcard, followed by a discounted ticket, rather than a standard fare.

TVMs or online ticketing do not offer passengers the cheapest ticket for their journey, or clearly explain restrictions on certain fares, such as operator-specific tickets. Indeed, there is no requirement in the DfT's Schedule 17 guidance for TVMs to offer all fares. This will undoubtedly mean that passengers lose widespread and easy access to a range of products and fares.

Interestingly, DfT research published in late 2022 found that a third of adults (increasing to 45% who were struggling with bills) found it difficult to choose the most suitable ticket when travelling by public transport.⁹ It therefore stands this this is likely to increase if there is a widespread closure of ticket offices and de-staffing of the railway.

Staff in the ticket office can use their expertise to offer passengers a range of routes and connections and different classes for different legs of a journey. It can be very confusing for passengers to know which ticket is most appropriate for their journey, especially where there are multiple train companies operating on a route or from a station. Staff in the ticket office will split tickets for passengers when they know this is cheaper than buying a single ticket. They will also split tickets where a discount, for instance, the Network Railcard, applies only to part of the journey.

Using TVMs is a one-sided process, there is no interaction between customer and retailer like there is in the ticket office. In contrast, ticket office staff can ask customers questions about their journey and requirements to ensure they get the right ticket for their journey.

Many TVMs do not take cash, or permit a part cash, part card payment and cash can obviously not be used to make purchases online. Across the UK, there are around 1.3 million adults who are 'unbanked'¹⁰ meaning that they do not have a bank account and are therefore likely to rely on cash for purchases. Given that people on lower incomes and older and disabled people are more likely to use cash¹¹, these groups stand to be disproportionately affected by ticket office closures and may find it difficult to travel as a result.

Similarly, there are many people who cannot use online ticketing and will be particularly disadvantaged by the train companies' proposals. London Travelwatch's recent research into digital exclusion on London Transport found that 1.5 million people in London were being left behind by a digital-first approach to transport, with 1 in 6 people saying they are unable to buy a ticket as they can't use or don't have access to a smartphone or the internet, and 1 in 5 saying they had paid more for travel because they are not able to buy tickets online or via apps. And as the research found, digitally excluded people were more likely to be older, disabled and have a lower income.

We also note with concern that there have been attempts by train companies to actively discourage passengers from using ticket offices, for instance, through making reduced or sale fares available online only. Last year, RMT opposed Northern's decision to withdraw Advance Purchase on the Day Fares (APOD) from sale at its ticket offices. The motivation behind this was undoubtedly to disincentivise using ticket offices, as the fares remain available online and at TVMs. This decision, of course, disadvantaged anyone who cannot use digital ticketing.

As justification for these proposals, the Government and rail industry regularly cite the figure that

⁹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1165693/our-changing-travel-how-people-s-travel-choices-are-changing.pdf

¹⁰

<https://publications.parliament.uk/pa/cm201719/cmselect/cmtreasy/1642/164205.htm#:~:text=The%20FCA%20has%20published%20research,not%20have%20a%20bank%20account.>

¹¹ <https://www.ageuk.org.uk/latest-press/articles/2021/one-in-five-older-people-rely-on-cash-for-everyday-spending/>

12% or 1 in 8 tickets are sold at the ticket office. The Government has confirmed this figure is from 2021/22¹², in the midst of the global pandemic when passenger numbers were compressed, and therefore does not necessarily reflect current patterns, where passenger numbers have in some cases started to exceed pre-pandemic levels. The 12% figure is also understood to include tickets brought from or for travel from stations where there is no ticket office.¹³ The ORR publishes passenger journey statistics based on ticket sales data. In 2022/23, there were 1.5 billion passenger journeys, 12% of which is 180 million. This is still a significant demand for the ticket office.

Notably, C2C's consultation response states that in the 12 months to June 2023, 35.8% of tickets were purchased at ticket offices. Of course, the Government's and train companies' reductive focus on transactions ignores the much wider role provided by the ticket office staff, and there is no measure of the meaningful and helpful interactions they have with passengers on a daily basis.

Criteria: Passengers requiring assistance to travel receive that assistance in a timely and reliable manner. This will include 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.

"We have a number of deaf customers who conduct transaction written in a notepad with us. We also have a number of regular customers with autism who perform their transactions with us by preference and need. Countless older customers are saying they will just stop travelling by train if there is no ticket office to help them plan and purchase. Travel is a frightening experience if you are dependent on others to help you complete that journey successfully."

"I have had many people in tears at my window. Crying because their freedoms are about to be curtailed."

"You'd have staff at a station 09:30-11:30 that's basically saying disabled and older people who need assistance can only travel at these times otherwise this help wouldn't be there for them"

"There is nothing inclusive about disenfranchising the most marginalised in our society. Many customers like the personal touch that they receive in the ticket office, especially those with sensory needs who really benefit from getting away from the hustle and bustle of the platforms and concourse and having a calmer ticket office/travel centre where they can discuss their needs and get the best product or journey to help them make their journeys."

Comments from RMT Survey of Ticket Office Members

As the watchdogs will undoubtedly be aware, there has been widespread and vocal opposition to the proposals from disabled and older people, and organisations representing them. For instance, over 180 disabled peoples' organisations have signed a petition coordinated by the National Federation of the Blind UK¹⁴ and there are nearly 90 signatures to the letter of objection coordinated by Transport for All¹⁵.

RMT fundamentally believes that if the proposed closures are permitted to go ahead, there will be a significant worsening of the facilities and support offered to disabled, Deaf and older people. Importantly, we do not believe that TOCs will be able to fulfil their duties in relation to Turn Up

¹² <https://questions-statements.parliament.uk/written-questions/detail/2023-05-05/183877>

¹³ <https://www.modernrailways.com/article/modern-railways-august-2023>

¹⁴ <https://www.nfbuk.org/nfbuk-petition-on-safety-security-and-accessibility-at-all-train-stations-in-the-uk/>

¹⁵ <https://docs.google.com/document/d/1BAXyWPHijGhivEtWapYswqwrZGr88z9kX8XZ86c05q/edit>

and Go despite this being a legal right for disabled people.

The train companies themselves are aware of the potential impacts on disabled people of what they are proposing, yet they are seeking to press ahead regardless. The TOCs' Equality Impact Assessments identify many risks to disabled and older people, instance:

- **Avanti** – *"Ticket offices are a known space for passengers to find staff and receive assistance, not just for purchasing tickets. This could result in passengers not receiving the support they need leading to them no longer choosing to travel by rail."*
- *"This project may lead more customers to use the TVMs. TVMs may not be accessible for some disabled customers, including those with visual impairments."*
- **Northern** – *"Customers at 131 stations will not be able to use cash to purchase ticket products in or at the station, impacting those who rely on cash as a payment method. Despite alternative cash purchase channels being in place, this may inconvenience some customers as they will need to print a Promise to Pay ticket from a TVM before boarding a train. This will particularly impact the elderly, and/or communities that are more deprived, as they are more likely to prefer cash as their valued form of money."*
- *"The proposed stations reform will bring a change in the routine for many customers, potentially creating increased levels of stress and anxiety. The total number of station staffing hours is reducing across the majority of stations impacted in this proposal, meaning that some accessibility requests may not be able to be supported during the same hours that they are currently, in particular 'turn up and go' requests. As such, some customers with disabilities may not receive assistance during hours where the staff presence has been removed. This may discourage some passengers from using the railway."*
- *"Disabled people are at greater risk of incidents of abuse and unwanted sexual behaviours; in recent years, there has been a 43% increase in the number of disability-related hate crimes. The lack of colleagues presence may increase personal security and safety concerns when travelling."*
- **Greater Anglia** – *"Accessibility and suitability of Ticket Vending Machines (TVMs): There are currently a range of tickets and railcards which can only be purchased via ticket office (including discounts for wheelchair users and customers with a visual impairment); many TVMs do not accept cash payments; some customers may struggle to use a TVM, e.g. due to disability."*
- *"Certain aspects of service delivery may be reliant on the ticket office: landline telephone for handover protocol; hearing loops; meeting point for assistance."*
- **East Midlands Railway** – *"Not all ticket products are available to purchase on board the train or at the TVMs. This may leave the customer at a financial disadvantage, by having to buy a more expensive ticket type."*
- *"Customers who have sight and hearing loss may not be able to navigate the station."*

It is also clear that the mitigations proposed do not provide for the same level of accessibility as under current arrangements, and importantly, if ticket offices are permitted to close, whatever the train companies are proposing now are just temporary arrangements that could be changed in the future.

Already, it is unacceptable that disabled people face numerous barriers in accessing the rail network and are three times less likely to travel by rail than non-disabled people.¹⁶ Twenty-two percent of the population had a disability in 2020/2 and since 2002/3 the number of people reporting a disability has increased by 3.8million (+35%).¹⁷

As we have already detailed, the motivation behind these proposals is not 'getting staff from behind the glass' in order to help passengers, it is about cutting thousands of station staff jobs

¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/972438/transport-disability-and-accessibility-statistics-england-2019-to-2020.pdf

¹⁷ <https://researchbriefings.files.parliament.uk/documents/CBP-9602/CBP-9602.pdf>

across the network. The presence of staff is vital for ensuring the railway is accessible to all. At many stations ticket office staff are the only staff present, and their responsibilities often include assisting passengers on to trains, including with ramps where required and meeting them off the train. Where there are other station staff at the station, ticket offices and ticket office staff provide a fixed location where passengers know they will be able to get specialist and dedicated advice and assistance and at many stations the ticket office is the meeting point for pre-booked assistance. For many older and disabled passengers, it is simply not possible or safe for them to roam around a station trying to locate a member of staff.

TVMs are not accessible for many disabled people, the functionality is poor and there is no interaction, unlike in the ticket office. Many full height TVMs are not physically accessible for wheelchair users. As detailed above, disabled people are much less likely than non-disabled people to have access to the internet¹⁸, and therefore online ticketing is not accessible for many. A March 2023 survey by the Guide Dogs charity of its online member panel asked for their views about proposed policies relating to rail staffing (ticket office closures, reduced staff at stations and on board, and DOO). 92% said that such reductions in staffing provision would make train travel less accessible for them, 91% said they would be less confident travelling by train and 82% said they would be less likely to travel by train. The survey report concludes by highlighting that rail travel facilitates an active social life for many visually impaired people, and that this could be limited by ticket office closures and reductions in rail staffing.

As our analysis of the train companies' proposals (contained later in our response) shows, in many cases the train companies are proposing significant cuts to staffing compared to current ticket office hours. At Avanti, which is proposing to close all of its 19 ticket offices, there would be a reduction in ticketing support assistance of more than 350 hours per week. At Northern, its proposed 'journey maker' mobile staff hours (and the changes to hours at the 18 stations proposed to retain ticket offices) represent a reduction of nearly 6500 hours per week compared to current ticket office hours. At 16 East Midlands Railway stations there are no proposed staffing hours, with simply 'weekly' or 'daily' visits 'expected' from mobile staff.

We reiterate that it is only Schedule 17 arrangements that guarantee when staff are present at a station, and for this reason this is when many disabled and older people will opt to travel. Tearing up Schedule 17, which is what is being proposed, will mean disabled people have no guarantees of when staff will be present. The weekly or daily visit model proposed by a number of TOCs is completely unacceptable and gives passengers zero certainty of when or if staff will be present. We believe that Transport Focus and London Travelwatch have a duty to retain Schedule 17 arrangements by objecting to the train companies' proposals.

Even at the times where it is proposed staff would be available at the station for ticketing support, this would be under a 'mobile' or 'roving' model, which is categorically not an adequate replacement for staffed ticket office in a fixed location. As already highlighted, it is simply not possible or acceptable to expect many disabled or older people to search around a station for a mobile member of staff. The ticket office provides a fixed location where passengers know they can get advice and assistance, and many guide dog users report that their dogs are trained to learn the route to the ticket office. Even if they do locate someone, the ability of that member of staff to give dedicated and one-on-one advice will be far harder when out on a platform, with other passengers seeking to get their attention, than at a ticket office window. Requiring staff and passengers to conduct transactions out on the platform puts them both in a much more vulnerable position, and also risks passengers being victims of deceptive or abusive behaviour, for instance if a member of the public were to pretend to be a member of staff.

A mitigation proposed by the train companies is the presence of help points at stations – however, this is completely inadequate and by no means an acceptable replacement for a staffed ticket

¹⁸ <https://www.transportforall.org.uk/campaign/ticket-office-closures/>

office. ORR mystery shopping data shows these have a fail rate of around 50%¹⁹, and help points themselves are not accessible for many disabled people.

As the joint letter coordinated by Transport for All states 'these proposals will make it impossible for disabled people to access the support we need to travel by rail'. This concern is echoed by our ticket office members, many of whom report passengers saying they simply will not be able to travel by rail anymore if these proposals go ahead.

The Government's own Disabled Person's Transport Advisory Committee (DPTAC) has, for years, warned the Government about the 'toxic combination of driver-only operated trains and unstaffed stations' for disabled people.²⁰ In October 2022, a member of DPTAC, Matthew Smith, resigned from the Committee, stating that the Government's already discriminatory policies look set to get 'drastically worse' if it goes ahead with ticket office closures.²¹ Yet, bizarrely, the industry body, the Rail Delivery Group, has highlighted the inadequate staffing provision as justification for these proposals stating that 'stations without ticket offices already make up 43% of those operating in the UK, with a further 40% being staffed part-time'. Rather than seeking to justify more cuts to staffing, this should make it apparent that much of the railway is already inaccessible as a result of being unstaffed or partially staffed.

In 2019, the then Chair of the EHRC wrote to the Transport Select Committee stating that 'the impact of ongoing transport policies remains a concern. In particular, the move to driver only operated (DOO) trains, as well as reductions in staffed stations. We believe that the shift to DOO trains, with the increased likelihood of there being no second member of staff on board to assist passengers, and a decrease in staffed stations could represent a diminution of protection for disabled people, and potentially be breach of the Equality Act 2010.'²²

The EHRC has also raised concerns more recently about the impact on the rail operators' abilities to meet their duties under equalities legislation, stating in correspondence with us and others that they 'share' our concerns about the impact of the proposals. We understand that in light of this the EHRC has met with the DfT, ORR and Transport Focus.

One of the RDG's four pledges is that 'those with accessibility needs will always be supported' but we fail to see how train operators would be able to meet the commitments contained within their Accessible Travel Policies (ATPs) if they are able to go ahead with these proposals. By severely reducing or no longer guaranteeing when staff will be present, the TOCs are essentially tearing up any notion of Turn Up and Go. Requiring passengers to roam around a station for a mobile member or staff, locate a help point which may or may not work or wait for a mobile team also does not equate to passengers being able to Turn Up and Go.

In addition to Turn Up and Go, TOCs existing ATPs include various roles for the ticket office, which would no longer be able to be fulfilled if the proposals are implemented, for instance:

- **East Midlands Railway** – "*Where you have booked assistance for a journey at a staffed station (unless agreed otherwise in your booking) please approach the ticket office to let us know you have arrived.*"
- **GWR** – "*You can obtain information about the services provided by GWR and all other train companies at our ticket offices or clearly signed information points at some of our larger stations (usually open at the same time as the ticket office).*"
- **Greater Anglia** – "*Where assistance has not been arranged in advance, please speak with a member of our station team (usually at the ticket office)*"
- "*At a larger or staffed station you can get all of the information you need from either a*

¹⁹ <https://www.orr.gov.uk/sites/default/files/2022-07/accessible-travel-policy-implementation-review-july-2022.pdf>

²⁰ <https://www.rmt.org.uk/news/govt-advisors-warned-doo-trains-are-toxic-for-disabled/>

²¹ <https://www.disabilitynewsservice.com/government-accessible-transport-adviser-quits-over-rail-staffing-discrimination/>

²² <https://twitter.com/ABCommuters/status/1097905211149090816/photo/1>

ticket office or customer information desk."

- **Northern** – *"You can obtain information about the services provided by Northern and all other train companies which serve the station at our ticket offices."*
- *"You can buy the full range of tickets from staffed ticket offices. Our ticket offices will accept all major credit/debit cards, cash and Rail Travel vouchers"*
- *"The meeting point at staffed stations is at the ticket office, this will be clearly identified, to help customers who have booked assistance to locate and meet our staff"*

The ORR, which is responsible for approving the TOCs' ATPs, wrote to the operators on the day the consultations were launched, seeking 'an initial high-level review of your proposals against ORR's Accessible Transport Policy (ATP) guidance', which suggests that the TOCs had not provided this to the ORR in advance of putting their proposals out for public consultation. We have significant concerns that the train companies could be permitted to proceed with these proposals following the public consultation before they have submitted revised ATPs to the ORR for review.

Already, the railway is not fully accessible for disabled people. It is unacceptable that the train companies are pressing ahead with these damaging proposals which would mean many disabled and older people can no longer use the rail network. We firmly believe that these proposals would mean the train operators would be in breach of their legal duties under equalities legislation and cannot be permitted to proceed.

Criteria - Passengers can get the information they require to plan and make a journey, including during periods of disruption. This will include the information channels available at the station and the support available to help passengers who need assistance.

"We would not be able to provide a high level of 1-2-1 service to our customers if we were taken out from the ticket office. We would not have all the relevant information at our fingertips and we would not be able to dedicate time to in depth queries that may require a little more time."

"One person is unable to perform 3/4 roles. You can't sell a ticket and help someone on the machine plus operate a barrier and give out information all at the same time."

"At the moment, if a customer needs to find a member of staff for any reason including, assistance, medical emergency, travel advice including ticketing they know staff will be found at the ticket office. If we are deployed as mobile team we could be anywhere on the station at any given time which would mean a customer would have to navigate multiple platform and stairs to find a member of staff."

"We won't be able to help them if they purchase the wrong ticket or if they need to change it. They won't have access to the whole range of ticket and to the best value."

Comments from RMT Survey of Ticket Office Members

As Transport Focus pointed out in its recent submission to the Transport Select Committee 'in much of our research there is a consistent message coming through about staff: passengers like and value having staff around'. Undoubtedly, an important part of the role played by staff is in relation to the provision of information, including during periods of disruption. As Transport Focus' research has found, passengers experiences of unplanned disruption 'are heavily driven by the interaction with, and information provided by, staff'²³ and that during periods of disruption 'passengers should not feel that they are being 'left to get on with it' or that their needs have not

²³ <https://www.transportfocus.org.uk/publication/passenger-attitudes-towards-rail-staff/>

been thought about'.²⁴

Ticket office staff are customer service professionals. They provide passengers with dedicated advice and expertise about their journey and onward travel. They can tailor their service to meet their customers' needs in a way that TVMs or online ticketing is unable to. Ticket office staff have an in-depth knowledge of what is a very complex ticketing system. Closing ticket offices and cutting staff risks this knowledge and skills being lost forever.

Importantly, ticket office staff ensure passengers get the best value ticket for their journey. Conversely, TVMs do not automatically offer passengers the cheapest ticket for their journey, or clearly explain restrictions on certain fares, such as operator-specific tickets. Indeed, there is no requirement in the DfT's Schedule 17 guidance for TVMs to offer all fares nor for them to ensure passengers are able to purchase the cheapest fare for their journey.

RMT therefore believes that the train companies' proposals would make it much harder, and many cases impossible, for passengers to get the same level of information as is available now from the ticket office. Cutting thousands of staff from stations will undeniably mean that there are fewer staff available to provide information to passengers. Furthermore, where staff are present, this would, in the vast majority of cases, be in a new 'multi-functional' role outside of the ticket office, which would limit their ability to give one-on-one advice and information to passengers and restrict the information they themselves have access to, as mobile staff are likely to only be equipped with a portable device such as a tablet. This model will be particularly problematic for passengers requiring assistance who may not be able to search around a station for a member of staff.

Criteria - Passengers feel safe at a station. This will include perceptions of personal security and how train companies will provide reassurance for passengers wanting to travel.

"We already have problems with antisocial behaviour, often requiring police attendance, with no staff this would inevitably worsen."

"We are the front line, often the first point of contact. The eyes and ears of the railway. There are many examples from within my office where we have prevented runaway children, county lines drug dealers, protected and advised victims of domestic abuse. Closing ticket office means destaffing stations and more risk to passengers."

"We recently had a stabbing at my station and it is believed that the victim is still alive because of staff presence. Not only was a prolonged attack prevented but first aid and a secure place was provided while waiting for the emergency services. The same week there was also a suicide intervention. That's just 2 lives saved."

"No staff presence in evenings, will increase cases of antisocial behaviour and station vandalism."

Comments from RMT Survey of Ticket Office Members

Staffed ticket offices have an important role in supporting passenger safety and security, which would be significantly diminished under the train companies' proposals. As the passenger watchdogs will be aware, there is a consistent theme emerging from research, which is that passengers like and value the presence of staff. Having staffed ticket offices supports passenger perceptions and feelings around safety, and closing ticket offices will most likely lead to many passengers no longer feeling safe when travelling.

²⁴ Ibid

A 2016 Transport Focus report found that one in ten passengers had cause to worry about their personal security during a rail journey during the past six months. The main causes of these concerns were the anti-social behaviour of passengers and the lack of staff. When passengers were asked what could allay concerns about safety, they 'consistently identified staff presence as the key'²⁵. In the report Transport Focus confirmed that 'cutting the number of staff, either at stations or on the trains, runs counter to what passengers actually want and could jeopardise their confidence in their ability to get to their destination safely.'

Ticket office staff are trained and experienced in dealing with difficult incidents and will endeavour to diffuse situations to prevent them from escalating and the presence of staff deters abusive and anti-social behaviour. Ticket office staff also provide support and assistance to passengers during times of disruption or in response to emergencies and their role often includes carrying out safety and security checks at the station throughout the day.

Ticket office staff often have sight of most passengers accessing a station, including via CCTV, and can monitor/flag passengers they have concerns about, for instance if they suspect someone is suicidal or involved in county lines activity. Our members report that when stations become unstaffed, ASB and violence often increases.

RMT believes that the safety and security of certain groups may be particularly impacted by the train companies' proposals. Between 2020/21 and 2021/22 incidents of disability related hate crimes increased by 43%²⁶, and whilst these figures are not specific to the railway, they are clearly indicative of a concerning trend.

RMT also has particular concerns about the impact on the safety of women and girls of the train companies' proposals. It is well established that sexual harassment on public transport is a significant problem and an issue that disproportionately impacts women and girls:

- An RMT survey of women public transport members in November 2021 found that 45% had prevented passengers being sexually harassed in the last five years and nearly three-quarters thought that sexual harassment on public transport is becoming a bigger problem.²⁷
- YouGov research from 2020 found that 55% of women had experienced some form of unwanted sexual behaviour on public transport in London.²⁸
- Research by the Suzy Lamplugh Trust from 2021 investigating violence and aggression on public transport found that a shocking 97% of women respondents experienced some form of unwanted behaviour on public transport in the past 5 years and were also more likely to have experienced sexual assault and rape, as well as most behaviours which could be interpreted as sexual harassment.²⁹

It is therefore unsurprising that research shows that the presence of staff is important in supporting women and girls' perceptions and experiences of safety when travelling by rail. For instance, research published by Transport Scotland in 2023 found a 'consensus' that the presence of staff made women and girls feel safer, as did ticket offices being open and staffed and went on to recommend that the Scottish Government look to increase staffing provision on its rail network.³⁰

The UK Government's recently published National Travel Attitudes Survey found that nearly two-

²⁵ <https://www.transportfocus.org.uk/publication/passenger-attitudes-towards-rail-staff/>

²⁶ <https://www.gov.uk/government/statistics/hate-crime-england-and-wales-2021-to-2022/hate-crime-england-and-wales-2021-to-2022>

²⁷ <https://www.rmt.org.uk/news/international-day-for-the-elimination-of-violence-against-women/>

²⁸ <https://yougov.co.uk/topics/politics/articles-reports/2020/01/22/most-women-have-been-sexually-harassed-london-publ>

²⁹ <https://www.suzylamplugh.org/national-personal-safety-day-2021-campaign>

³⁰ <https://www.transport.gov.scot/news/women-and-girls-safety-on-public-transport/>

thirds of women said they avoid travelling alone when it is dark, 75% of women agreed that 'transport staff being able to deal with incidents' was important for personal safety and 63% of women said they would report a safety incident to a member of station staff, such as station staff.³¹

It is therefore extremely concerning that that the train companies in England, supported by the UK Government are actively pursuing policies that would significantly reduce staffing across the rail network.

The TOCs themselves are aware of the impact on safety of their proposals. For instance, the Northern Equality Impact Assessment highlights the following risks in relation to womens' safety:

- *60% of women and non-binary people have experienced a situation where they were felt uncomfortable due to their gender or physical appearance whilst travelling via rail.³² Women typically feel less safe than men while travelling but are more likely to notice enhancements in transit safety measures and feel safer as a result.³³ Staffed stations provide increased feelings on safety and comfort, and thus the reduced colleague presence may threaten this.³⁴*
- *In response to surveys, women noted that they wanted staffed stations, good lighting and visibility, CCTV cameras, and more and better trained colleagues on trains, especially at non-peak times.³⁵*
- *The reduction in colleague numbers and thus colleague presence may decrease customers perception of personal security and safety.*

Criteria - Passengers can continue to use facilities at a station. This will include access to facilities such as waiting rooms, toilets, lifts and car parking.

"Kidsgrove station is currently open 0610 - 1230 Monday to Saturday, EMR is proposing that it is visited by a mobile member of staff 'weekly' this would mean all the station facilities would only be accessible once a week."

"We have 2 waiting rooms plus a large waiting area in booking office including a disabled toilet with all these closed and locked from 14.00 that's a minimum of 5 hours a day passengers are being deprived of a safe waiting area and toilet facilities plus 11 hours on a Sunday clearly not the same as the have now."

Comments from RMT Survey of Ticket Office Members

At many stations access to facilities such as toilets, accessible toilets, waiting rooms and lifts are dependent on the presence of ticket office staff. Notably, a number of the TOCs' consultation documents are silent on the impact on access to facilities. This is the case for Avanti, Chiltern, East Midlands, Northern and SWR. Where LNER is not proposing to close ticket offices, it states that it will 'continue to offer the same facilities' but has no mention of access to facilities at the stations where ticket offices are proposed to close.

³¹ <https://www.gov.uk/government/statistics/national-travel-attitudes-study-wave-8/national-travel-attitudes-study-wave-8>

³² Jones, I. (2022) [Nearly half of women 'feel unsafe using public transport alone after dark'](#)

³³ Wallace, R.R., Rodriguez, D.A., White, C. and Levine, J. (1999) [Who Noticed, Who Cares? Passenger Reactions to Transit Safety Measures](#)

³⁴ Imperial News (2020) [Women 10% more likely than men to report feeling unsafe on city public transport](#)

³⁵ DfT (2012) [Transport for Everyone: an action plan to promote equality](#)

The other train companies state that access to facilities will not be affected by the proposals, but it is difficult to see how the same level of access will be maintained at any stations where the train companies are proposing to reduce or remove staffing provision. For instance, West Midlands states that access to facilities will be the same, yet it is proposing no permanent staffing for the majority of its stations, with just unspecified visits from mobile teams. We dispute that this would enable it to maintain the same level of access to facilities as now.

Ticket offices are normally the only place within stations where there are hearing loops installed and they require a member of staff to operate them. We aren't aware of any TOC consultation document making reference to how hearing loops would be operated if ticket offices are closed, and the reality is it is likely that they would no longer be available, meaning many Deaf people will not be able to access the assistance they require.

In March 2023, SWR installed life-saving defibrillators at all of its staffed stations. There is no mention in the consultation document of whether these would remain accessible, but given that only station staff and local ambulance services are given the codes to access them, it follows that these would no be as accessible on the days it is now proposed that stations will be unstaffed.

Criteria - Passengers are not penalised if they cannot buy the ticket they require from the station. This will include arrangements for issuing Penalty Fares or prosecutions for fare evasion.

The operators' proposals will undoubtedly cause significant confusion for passengers and staff about the implementation of penalty fares. It is difficult to see how operators could guarantee that passengers will not be penalised if they cannot buy the ticket they require from the station without a significant loosening of penalty fares regimes, which seems counter-productive in terms of revenue collection.

As we have already identified, the non-railcard disabled persons discount is only available from staffed ticket offices. Therefore, what will happen to disabled people who are no longer to access this discount from the station? This will undoubtedly increase anxieties and stress for disabled people who may either end up travelling at greater expense without the discount they are entitled to or not travelling at all. Both scenarios are completely unacceptable.

LNER states that 8% of ticket types would no longer be retailed at the stations where the ticket offices are proposed to close and at these stations they will 'support customers with purchasing these online or direct them to a ticket office where all tickets will be available'. What if a passenger doesn't have the means to purchase online? It is completely unreasonable to suggest they travel miles away to another station with a ticket office, yet will they be penalised if they do not do so?

Many stations that currently have a ticket office only have one TVM. This will certainly lead to increased queuing on platforms if ticket offices are closed. Will passengers be permitted to travel if the queue is too long for them to get a ticket in time for their train? If not, is it fair to expect passengers to start their journeys earlier in order to access a limited number of TVMs?

Given the complete lack of consistency taken by the operators to the consultations and their proposals it's hard to envisage how the rail industry could ensure a consistent approach to penalty fares should their proposals be implemented.

Cost effectiveness

Under the TSA, changes to ticket office hours can be made 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.

RMT believes it is indisputable that the changes proposed **would not** represent an improvement in terms of quality of service, nor would the public continue to enjoy widespread and easy access to the purchase of rail products.

The train companies are often keen to highlight how their proposals will deliver on the 'cost effectiveness' element. However, there is no definition in the TSA of what cost effectiveness means in practice. For instance, is it solely focused on the cost of delivery or does it include the wider impacts on the railway's finances? We are not aware of any train company proposals which give concrete details around how they believe they will deliver cost effectiveness.

Furthermore, the reality of these proposals will be that many passengers, including many disabled and older people, will no longer be able to or feel confident travelling by rail. This, combined with a potential loosening of the fare evasion regime risks significantly denting passenger revenue, which just adds to the reasons to oppose these short-sighted proposals.

Train Companies' Proposals

RMT has conducted a station-by-station analysis of each train companies' proposals, which are summarised below in order to support our arguments around why these proposals will represent a significant detriment for passengers compared to current arrangements. We believe it is important to note that a number of TOCs have been highly evasive about the proposed arrangements in comparison to current provision, which we believe means it is hard for passengers to truly get an understanding of what the full impacts will be.

Avanti

Avanti states it is closing all of its 19 ticket offices and moving staff to multi-skilled 'customer ambassador' roles. Comparing current ticket office hours to the proposed ticketing assistance hours reveals that there will be a reduction in ticketing staffing provision of over 350 hours per week. Avanti is proposing the loss of 190 ticket office/station staff roles. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

Chiltern

Chiltern proposes to close all of its ticket offices and wants passengers to 'purchase your travel online or via mobile apps being arriving at the station'. It states that 'staff will be available to assist with your ticket purchase from self-service ticket vending machines'. Chiltern gives no concrete proposals for ticketing and accessibility staffing hours, merely stating that they will be 'similar' to now. Chiltern's ticket offices are currently open over 1700 hours per week, and under these proposals passengers have no guarantees about whether any of these hours will be maintained. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

C2C

C2C is proposing to close 20 of its 25 ticket offices and change the hours at its stations where the ticket office is proposed to remain open. At the other stations staff would become mobile 'floorwalkers'.

Cumulatively, it is proposing a reduction in staffing provision of 200 hours per week. In a number of instances, it is not proposing any floorwalker provision at stations where there are currently ticket offices. This is the case at Dagenham Dock (M-F), East Tilbury (M-F and Saturday), Limehouse (M-F and Saturday), Ockendon (M-F and Saturday), Purfleet (M-F), Rainham (M-F), Upminster (Sunday) and West Horndon (M-F and Saturday). C2C is proposing a reduction in its station staffing of 21.6 roles, which represents around a quarter of its station staffing establishment. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

East Midlands Railway

Of its 29 ticket offices, EMR is proposing to keep ticket offices at six stations. At seven stations it states that they will be staffed from 6am – 11pm to 'fulfil any customer service requirements'. However, this is likely to reflect existing staffing arrangements (which are separate to ticket office staffing) and not an enhancement in staffing provision. It does not appear that the same level of services and products would be available at these stations and instead a full range of products would only be available at the six ticket offices.

At the rest of EMR's stations it is proposing no specific hours and instead these stations would get daily or weekly visits from mobile teams. Our view is that this represents a de-staffing of these stations, as there is no guarantee if and when staff would be present. Under EMR's proposals there would be a loss of at least 728 hours a week. EMR is also proposing a reduction in its station staffing establishment of 170 roles. At all stations where it is proposed the ticket offices would close (or hours would reduce), these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

Greater Anglia

Greater Anglia is proposing to retain 'Customer Information Centres' at 7 stations and close its remaining 47 ticket offices. At all of the CICs, the hours are proposed to reduce compared to the current ticket offices. At its stations categorised as 'fully staffed' the proposed station staffing hours likely reflect existing staffing arrangements rather than an increase in staffing provision. In its stations which are classed as staffed part time, staff are proposed to move into mobile roles, and in most cases their hours are proposed to reduce compared to current ticket office hours. At these stations, and the CIC's, there is a proposed loss of over 730 hours a week. In a number of cases, stations which currently have a staffed ticket office will only receive visits from mobile teams on certain days of the week. Greater Anglia is proposing the loss of nearly 230 station staff jobs. At all stations where it is proposed the ticket offices would close (or hours would reduce), these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

GWR

GWR is proposing to close all of its ticket offices, with a phased approach meaning all would be closed by December 2024. It proposes to move ticket office staff to 'other areas of the station'. Under the current proposals GWR states that staffing hours would be similar to current ticket office hours, with a loss of 125 hours per week. However, the reality is that if it gets permission to close ticket offices, there's nothing to stop the company significantly reducing staffing provision in the future, especially as it is proposing to cut 350 station staff roles. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

GTR

It is difficult to ascertain the true impact of its proposals as its consultation document appears to

compare current ticket office hours with station staffing hours (which as already detailed are two different things in many train companies). However, GTR is proposing the loss of over 260 station staff jobs so undoubtedly there would be a reduction in staffing provision. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

LNER

LNER is proposing to close six ticket offices and retain seven. At the stations where it is proposing to close ticket offices it merely states that 'stations will be open and staffed from the first to last train' and 'assistance with ticketing will be available during these times'. However, this gives no confidence about the level of assistance that will be available to passengers and at what times, given that it already has first to last staffing provision at its stations, which is in addition to ticket office staffing. However, the company is proposing to reduce its station staffing provision by 67 roles, which is over 10%. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

Northern

Northern is proposing to close 131 ticket offices and retain 18. Where ticket offices close, it proposes to move staff into mobile roles called 'journey makers'. It is also proposing to reduce its station staffing provision by 272 roles, which is more than 50%. Cumulatively, its proposals equate to a reduction in hours of nearly 6500 a week compared to its current ticket office hours. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

Southeastern

Southeastern is proposing to close ticket offices at 40 of its stations and says it will consult on closing its remaining c100 ticket offices at a future date. It proposes to reduce station staffing at its medium and larger stations and move staff onto the platform at smaller stations where they are already the only staff present. The company is also proposing the loss of 300 station staff jobs. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

SWR

SWR is proposing to close its 153 ticket offices and has three categories for staffing provision within these stations. Across its stations there are 135 instances where stations that currently have ticket offices in operation would no longer be staffed on certain days of the week. SWR is proposing the loss of 180 station staff jobs. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

Transpennine Express

TPE is proposing to close 14 of its ticket offices and reduce the hours at the other 2 ticket offices. At the two stations where it plans to retain ticket offices, their cumulative hours will reduce by 112 a week. At 10 other stations it is proposing to reduce staffing provision, meaning a further cumulative reduction per week of 370 hours. It is proposing to reduce its station staffing by 42 roles (25%). At all stations where it is proposed the ticket offices would close (or hours would reduce), these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could

further diminish in the future.

West Midlands Trains

WMT is proposing to retain 'Customer Information Centres' at 6 stations and close ticket offices at the remaining stations. At the stations where ticket offices are proposed to close, it plans to move staff into mobile 'roving' roles and does not propose any specific hours for staffing provision, stating that 'exact hours staff would be present at each station will be finalised following the completion of the consultation' which makes it extremely hard for passengers to know what they are being consulted on. Given that it has given no commitments about future staffing provision, there are around 3800 weekly ticket office hours that could be lost. The company is proposing a reduction of 250 station staff roles. At the stations it operates under the banner of London Northwestern, there are 4 stations proposed to retain Customer Information Centres with the other ticket offices closing and staff moving into mobile 'roving' roles. At these stations there are around 800 weekly ticket office hours that could be lost. At all stations where it is proposed the ticket offices would close, these proposals represent a worsening for passengers in relation to the assessment criteria and importantly only represent a temporary arrangement that the train company could further diminish in the future.

Summary

To conclude, RMT believes that the proposals put forward by the thirteen train operating companies for ticket office closures (or reductions in ticket office hours) would, if implemented, represent a significant deterioration for passengers in terms of quality of service and access to products and services at all of the impacted stations. Moreover, we believe the proposals would significantly worsen passenger accessibility, hinder passengers' ability to get information at stations, reduce feelings of safety at stations, restrict access to facilities and cause confusion and anxieties around whether they will be penalised for travelling without a ticket.

As we have already set out, we do not believe that the process set out in the Ticketing and Settlement Agreement is appropriate for the scale of closures being proposed, and as a result of this, there has been significant misinformation being fed to passengers from both the train companies and the Government. Despite these obstacles, the unprecedented scale of opposition to the closures from passengers around the country cannot be ignored. We believe that Transport Focus and London Travelwatch must listen to and act upon the concerns of passengers and reject all of the proposals to close ticket offices, or reduce ticket office hours, at Avanti West Coast, C2C, Chiltern, East Midlands Railway, Greater Anglia, GTR (Great Northern, Thameslink and Southern), Great Western Railway, LNER, Southeastern, South Western Railway, West Midlands (including London Northwestern Railway), Transpennine Express and Northern in their entirety.

1st September 2023