

Transport Committee

Oral evidence: [Accessible transport: legal obligations - rail ticket office closures](#), HC 580

Wednesday 13 September 2023

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Members present: Iain Stewart (Chair); Jack Brereton; Sara Britcliffe; Paul Howell; Karl McCartney; Grahame Morris; Gavin Newlands; Greg Smith.

Questions 74–121

Witnesses

[I](#): Christopher Brooks, Head of Policy, Age UK; Mick Lynch, General Secretary, RMT; Katie Pennick, Campaigns and Communications Manager, Transport for All; and Louise Rubin, Head of Policy, Scope.

Written evidence from witnesses:

- [Rail, Maritime and Transport Workers Union](#)

Examination of witnesses

Witnesses: Christopher Brooks, Mick Lynch, Katie Pennick and Louise Rubin.

Q74 **Chair:** Welcome to today's session of the Transport Select Committee. Today we will look at the issue of rail ticket office closures, as part of our wider inquiry on accessibility issues in transport. Before I invite the panel to introduce themselves, I record our thanks for all the submissions that we have received from organisations and members of the public sharing their concerns and experiences. It has been very helpful in giving us a background for today. I invite the panel to introduce themselves. State your name and organisation, please. We will start with Katie.

Katie Pennick: Hi, everyone. I am Katie Pennick. I am the campaigns and communications manager at Transport for All. We are the disabled-led organisation working towards equal access to transport and streets for disabled people across the UK.

Louise Rubin: I am Louise Rubin. I am head of policy and campaigns at Scope, the disability equality charity.

Mick Lynch: Morning: Mick Lynch, general secretary of the RMT union.

Christopher Brooks: I am Christopher Brooks. I am head of policy at Age UK, the older people's charity.

Q75 **Chair:** Welcome all, and thank you for giving us your time this morning. Before we get into some of the issues of substance with the proposals, I would like to ask for your thoughts on the consultation process, and where we are. I am aware that there were considerable concerns initially about the 21-day consultation period, which has been extended. We now have, I believe, 680,000 submissions to the two bodies that are assessing it. Do you think that volume of submissions gives them an opportunity to properly encapsulate the range of concerns, or are there still missing pieces? Katie, I will ask you to comment first.

Katie Pennick: I am very glad to see that 680,000 people responded. It goes some way to demonstrating the enormity of public feeling on the issue. Disabled people have not had a fair opportunity to comment on proposals that will disproportionately impact on us.

I have a few comments about the accessibility of the consultation process itself. In a letter sent to you a few days ago by the Rail Minister, he claimed that all train operators had published their EQIAs on their websites and that they had taken "considerable steps" to provide materials in accessible formats. In fact, operators did not initially make alternative accessible formats available. It was not until several operators were under the threat of legal action from disabled campaigners that they made some of the documents available, and the deadline was extended. Where the formats existed, they were often difficult to get hold of. Not all formats were available. In one instance, I asked for British Sign Language and was offered Braille instead, which is obviously not an



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adequate substitution. Any consultation, but especially one on proposals that will disproportionately impact disabled people, is rendered useless if it is not accessible to the very people who will be impacted.

Even now, to this day, there are still formats missing. For example, operators that never made their consultation materials accessible in Braille include c2c, East Midlands, Great Northern, Northern, Southern, South West Railway and Thameslink. Two operators did not publish their consultations in British Sign Language: c2c and Chiltern Railways. Operators whose EQIAs were available only in pdf form, which is not accessible to everyone, were Avanti West Coast, c2c, Chiltern Railways, Great Western Railway, South West Railway and TransPennine Express. That is just to do with the accessibility of the formats themselves, without saying anything about the process of the consultation.

It took my Transport for All campaigns and policy team the six weeks for which the consultation was open to pore over the consultation materials, and we are all people with professional expertise. We have a background in rail policy. Even then, it was really difficult to tease out the substance and details in the consultations. I am really disappointed to see the opaqueness of the consultation documents, and the number of misleading statements in them, particularly around staffing.

Q76 Chair: Thank you. Louise, what is your opinion on whether the volume of consultation captures the full range of concerns and experiences?

Louise Rubin: I think Katie summed it up perfectly. Clearly, the number of responses demonstrates the strength of feeling among not just the disabled community but a lot of people who are deeply concerned about the proposals.

Like Transport for All, we have found the process itself quite worrying. Very quickly, we heard from disabled people who told us that the posters up in stations, which were the primary way of getting the proposal across to people, were too often out of the line of sight of wheelchair users. They were in parts of the station nobody ever visited and were not accessible to people with visual impairments. We, like Transport for All, have found that it was not particularly accessible. Trying to find the details on individual train operating companies' websites was beyond challenging. They were buried in deep corners of websites, and were not in fonts and contrasts that were accessible for people. Beyond that, the very short length of the process, albeit that it was extended slightly, is unforgivable. I think it left disabled and elderly people feeling overlooked from the very beginning, from the outset. It is as if nobody wants to hear their opinions.

Q77 Chair: Thank you. Mr Lynch.

Mick Lynch: It has been a sham, and everyone knows it. We are going to get far more than 700,000. The 680,000 is for online electronic returns. They have not counted the paper returns, as far as we know. We



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could be going to three quarters of a million, which we understand would be the biggest response ever received.

These companies have threatened our people. LNER, who are here today, threatened our people with disciplinary action for wearing "Save our ticket office" badges and putting little posters up in their ticket offices. They were trying to force it through in three weeks. They were not interested in a mass response. They were not interested in engagement. This is cuts. Reform and modernisation are the two most abused words in this building. This is a fig leaf for cuts—mass cuts to staff and mass cuts to provision. They are not interested in what we are all supposed to be interested in—the turn-up-and-go social model of accessibility and disability. They just want to ram this through to save money.

They wanted to save £95 million; they spent £1.5 billion on the dispute, trying to fight this, and they got something that has grown out of all proportion. There would have been more responses if they had not hidden away the consultation documents, as we have seen, and hidden away the stuff in the stations. They are not interested in what goes on. They keep pumping out this figure that 12% of people are not buying tickets. Ticket offices are vibrant at the moment. If you go out anywhere on the network, people are queuing out the door. I think this figure of 12% is a fiction.

Q78 Chair: I will come on to some of that. I appreciate the concerns about how the operators went about the consultation, but at the outset what I am interested in and am trying to dig down into is whether the responses that have come in give a full spectrum of the concerns, or are there parts missing?

Mick Lynch: There will be parts missing, because some people still don't know about it, but it has been a massive response, which was unexpected. We think the whole thing has been a sham, designed to be rammed through while people were looking the other way. It all goes back to the Secretary of State, who initiated these changes through the contracts with the TOCs. He directs everything they do these days. He gets access to every letter that is sent. Of course, if the watchdogs object—on the limited basis they are allowed to—the decision will end up with him as well, so it is a controlled show. The whole thing is designed so that they can force this through in the way they want.

Q79 Chair: I understand. We will come to all those issues later. Mr Brooks, what is your opinion on the consultation process?

Christopher Brooks: Clearly 680,000 responses is a lot, but I think it could have been higher if it had been done in a more accessible manner. It was also very fragmented. Clearly, a national-level change is being implemented across the network, so there could have been a bit more ownership of it centrally, and trying to advertise the consultation more effectively through those routes. The fact that initially it was a 21-day consultation over the holiday season leads to the suspicion that it could



have been done in that manner to minimise responses. Obviously, it was subsequently extended, which is a good thing, but there are probably still a number of people who have not responded, particularly older people who are likely to be offline and may find it hard to respond to these things, yet who have very strong feelings and are adversely affected by the proposals.

Q80 Chair: Thank you. The operators have published their equality impact assessments of the proposals. How robust do you think those are? If you don't think they are robust, can you give us some specific examples of where they fall short?

Katie Pennick: Before I comment on the individual TOCs' EQIAs, I want quickly to raise the issue of the missing EQIA, which is the one that the Department should have made programme-wide. While the individual TOCs have made an assessment of the impacts at individual stations, we are missing the identification of cumulative impacts. We have been trying our hardest to get hold of this EQIA. We feel that disabled people should have had access to it before responding to a public consultation. On 11 July we submitted a freedom of information request to the Department for Transport. On the last day of the consultation, on 31 August, the Department responded, rejecting that request and stating that it was withholding the information under the formulation of Government policy exemption, and that "Ministers and officials need a safe space away from public scrutiny to formulate and develop" the proposals. I would argue that during a public consultation is exactly when you want public scrutiny of a policy.

My criticisms of the EQIAs that were made available from the train operators, although, as I have already mentioned, they were not always accessible, could fill an entire session, so I shall try to give you a whistlestop tour. My overarching comment is that they demonstrate a total lack of understanding of the barriers that disabled people face on rail. For example, East Midlands Railway identified a potential impact for blind and visually impaired passengers being unable to use ticket vending machines. Their suggested solution is that "EMR will work with local sight loss charities and hold information sessions that will support customers learning how to use a TVM." Similarly, c2c says it is "happy to spend time showing customers how our machines work." The suggestion that the barrier to using TVMs is simply lack of knowledge is frankly insulting. Another example demonstrating the lack of understanding comes from Great Northern, which says that the removal of hearing loops will somehow allow better communication as staff will be in the concourse, which is louder, so I do not see how that will benefit deaf and hard-of-hearing passengers.

A question that arose for me when I was poring over the many documents, totalling thousands of pages, was what expertise operators drew on in making their assessments. It is unclear what proactive engagement they have had with disabled people and our organisations.



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Certainly, train operating companies did not reach out to or contact our organisation during the development of the proposals. If they do not have that expertise available, how can we be satisfied that they have adequately identified all potential impacts?

A lot of the documents are copy and paste jobs. Chiltern is particularly guilty of that. Most of the individual station assessments are copied word for word for each station and do not take into account the specific circumstances in each area. All the EQIAs rely on the proposed mitigations not only being implemented—there is nothing to hold TOCs to account on that—but working successfully. We do not have confidence that the mitigations will be in place and will work by the time that ticket offices are set to shut. For example, there is no timeframe for any of this. Several TOCs have said they are going to put a TVM that will accept cash in every station, or that they will make sure there is an accessible TVM at each station. When? By what deadline? When is that happening, and with what money or funding? There is no detail on any of that.

I am sure that you must have seen the photo that was recently doing the rounds on Twitter of a permit to travel machine at Hatton station, which currently has no ticket office or machine. It is operated by Chiltern, whom I know you are speaking to later on. The photo shows that the machine does not accept the new £1 coins, which were issued in 2017. It is a niche example, but it demonstrates the speed at which operators might be bringing in their proposed modifications and mitigations. Some of the mitigations identified simply do not mitigate the impacts at all. For example, going back to Great Northern—

Q81 **Chair:** I need to bring in other people as well, so could you quickly summarise, please?

Katie Pennick: Yes. They have identified many impacts that are severe and severely curtail disabled people's rights and freedoms, and several of them have not been mitigated whatsoever, so we have no faith in these EQIAs.

Q82 **Chair:** Do the other panellists agree with that assessment, or do you have a counter-view or further points you would like to make?

Mick Lynch: I agree with that assessment. What strikes us, going round, is the point that was made at the start about the whole-system analysis. That is the job of the RDG—or the DFT, because the RDG does not exist, in some ways. It is just a club. If you want to travel between two points, you have to ensure that the system is there, not just on your line or in your place, or with your company. We have a national network operated by individual companies, and there is no whole-system equality impact that will mean you can turn up and go, and be able to rely, when you are doing interchanges that may involve bridges and all sorts of impediments and crossings, on having staff available at every point. The onus will be on the individual to book all that. I don't think they care about this. All the equality impact statements are afterthoughts to make the thing go



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through in the three-week period, as it originally was. It is just superficial and without meaning. That is what we have seen from the impact statements.

Q83 **Chair:** Thank you. Are there any additional points, quickly, before I turn to colleagues?

Christopher Brooks: Briefly, there is a lack of understanding about how difficult it is for people who are not internet users and computer users to use automated machines. It is extremely difficult. It is difficult to comprehend if you are a tech-savvy person who regularly uses computers, but it is extremely difficult to expect someone to go into a station and use a TVM, and be able to use the interface, however intuitive some tech-savvy designer thinks it is. It is very difficult, probably impossible for many people who are offline. Over a fifth of over-65s are still not internet users. To expect them to go into a station and do that is an extremely tall order.

Q84 **Chair:** Any additional points?

Louise Rubin: Yes. I agree with Mick's point about the system needing to work across the entire network. When people leave home to travel from point A to point B, something that has frequently come up from the disabled people we have spoken to is that they don't have confidence that the journey will go as planned. Even if you are familiar with your local station and what you need to get through when you are there, you do not know what you are going to find at the other end. The inconsistencies across the network are what really frighten people and make them lose confidence in taking on a journey.

Q85 **Sara Britcliffe:** Train operating companies say that taking people out of the ticket offices and bringing them on to the station will help people with their needs. Do you think there is any merit to that?

Louise Rubin: We have little faith that there will be enough staff to make it work. We have heard from the DfT that no station will be unstaffed, but it does not take long going through the TOCs' proposals to see that that is simply not true. There are numerous examples of TOCs saying that a mobile staffing unit will visit the station once or twice a week or that the offices will be partially staffed. That is not good enough. Disabled people have the right to travel when they need to. We cannot expect disabled people to limit their travel to suit the ticket office schedule. No, we do not have confidence that it can work. We do not believe that there will be enough staff to make it work; but even if there were, disabled people want to know where they can find them. When we look at some of the bigger stations, we cannot comprehend how you can expect disabled people to find roving members of staff. People take a lot of comfort and reassurance from knowing that there is a ticket office where they can go to ask questions and get help when, inevitably, things go wrong on a journey. We just don't understand how it can work.

Q86 **Sara Britcliffe:** Is there anyone who wants to comment?



Mick Lynch: Yes. A quarter of the people are to be made redundant. A quarter of the jobs on stations are going to be cut: 2,300. The companies have notified the staff already under the statutory letter, so they are not taking them out of the ticket office to work on the platforms. They are taking them out of the ticket office to make cuts—to cut jobs out of the system. It is nonsense that these people will all be redeployed. They are cutting the hours and the deployment. Often people need to travel off-peak, and those will be the very hours when staff will not be there. They will chiefly put people there at peak hours, when it suits the companies, not when it suits many pensioners and others who come out after the early morning rush. They will be left to fend for themselves. I think business people find it hard to understand the fear about travel that that puts into people's minds.

Schedule 17, which is the thing that's being abolished and that we have been consulted under, is the only means by which you can guarantee that staff will be there. It is a regulation. That is being abolished. When it is abolished, if it goes through, there will be no regulation for any of the train operating companies to put any staff on any station whatsoever. What is happening now is a temporary measure to get this through. In two years, there will be barely anyone working on stations on our railway, because there will be nothing to stop them de-staffing. They will say it is not efficient. Even the measures that they are putting in, which are only promises, not business commitments or regulations—they are not on the record—are commitments to get the consultation through. You cannot rely on it, and you cannot trust them. They are going to cut the staff and cut accessibility.

Q87 **Sara Britcliffe:** Thank you. Katie, do you want to say something?

Katie Pennick: Yes, that is absolutely the case. Disabled people need staffed stations, because of our hideous Victorian infrastructure. There is a massive step to get on to the train. I need someone to bring out a manual boarding ramp to help me get on. Blind or visually impaired people may require sight-guiding through stations. This is particularly an issue because of the lack of tactile paving on platform edges, which means that navigating a station independently is dangerous for many blind and visually impaired people. People who have mental health conditions, learning disabilities or cognitive impairments may need a bit of extra support to safely navigate a station, particularly if it is crowded. All those use cases demonstrate that staff need to be visible. They need to be located.

The idea that staff currently being behind the glass is a problem that needs to be fixed is not the case at all. It is actually one of the most important accessibility features of a ticket office. It is a designated place where disabled people can go and be assured that they will find assistance from that place. The idea of moving staff into multi-functional roles where they could be anywhere, on any of the platforms or anywhere on the concourse, or, indeed, anywhere else, requires disabled people to



arrive at a station and go traipsing round trying to find the member of staff. Disabled people may have energy-limiting impairments or mobility impairments. I already experience the impact of this, because a station that I use frequently has already closed the ticket office on Sundays. It now shuts at 1 pm on a Saturday. If I want to travel on a Saturday afternoon, I go to the ticket office and it is shut. No one is there and I have to find a member of staff. I have to push myself up a ramp, over the footbridge, down another ramp, trek one platform and then do the same again—trek the entire station. That is completely unreasonable.

Q88 Sara Britcliffe: On that point, do you think there is any way at all to be able to shut the ticket offices and to help those who need accessibility help? Is there any way to do it?

Katie Pennick: Something that has been suggested is the idea of a designated point where staff would be. We know that some operators have already rolled it out at several stations. Chiltern already has this customer-focused approach at its stations, including Oxford Parkway and Bicester. They have a big information desk that is fully staffed all the time, usually by two members of staff. The desk can take cash payments, sell any type of ticket that exists, including the D35 and D50 discounts that are not available online or at TVMs. They have staff who can provide assistance, book you a taxi if the lift is out of order, and all those things. There is a hearing loop as well. To all intents and purposes, there is no difference between that and a ticket office. The only difference, as Mick has already highlighted, is that there is no regulatory obligation for a train operator to keep staff at that helpdesk. Schedule 17 applies only to the ticket office, so we can have a ticket office 2.0 but there is absolutely nothing in place to ensure that TOCs will actually keep staff at the information desk.

Mick Lynch: It is un-mandatory and unregulated. They can remove it whenever they wish, with no consultation. That is what they want to happen. Steve Montgomery, who sat here and said there are no plans to close ticket offices—then he is going to close 1,000 of them, virtually—has said to me face to face, “Any hubs that we bring in will be temporary while we update TVMs and do other measures, until we get all the technology that we want.” Any information point, or passenger hub, which is the term you will hear later on, will be a temporary measure until the full transition comes in, and there will be no infrastructure, desks, windows, whatever you like—glass; there will be nothing in the future. That is what we had in the ‘90s on Silverlink going round north London: no ticket offices, no staff. Nothing.

Q89 Sara Britcliffe: Do you want to add to that?

Christopher Brooks: There is not much to add. I think Katie explained it all really clearly. I second it, and say that the beauty of the ticket office is precisely that people know where to go to get assistance. Obviously, they are very popular, and the staff in ticket offices are extremely helpful. With the limitations on technology available in the stations, particularly



navigating the very complex fare system and accessing the best deals, it is really important that that service is maintained. The proposals do not seem to stack up. They are clearly going to be a watered-down version of that support, with other limitations on the tickets that people can purchase and the assistance they can receive.

Q90 Sara Britcliffe: To follow on from that point, it is being reiterated a lot that this is a consultation process, so what changes do you think need to be made to the proposals to make sure that we help those with accessibility needs?

Christopher Brooks: In theory, you could probably deliver the support that people need in other ways. However, in practice, as Mick said, it is probably about cutting costs and reducing staff numbers, which is going to lead to poorer levels of customer service. The people who really need support—older and disabled people—will find it harder and harder to access. There is nothing in the proposals that is better than a ticket office. A ticket office probably trumps it on most counts. You could probably deliver it in an alternative way if it is adequately resourced.

Sara Britcliffe: Thank you.

Q91 Paul Howell: Mick, you and I had a corridor conversation the other week on this subject. It seems to me as though there are two different conversations going on. One is about the concept of closing ticket offices, and the other is what is going to happen next. A minute ago, Katie gave Bicester as an example of what would potentially be a good system, with people manning it. It is managed; it is providing a service. It is not a ticket office, but it is doing the sort of things that we have been told they are talking about transitioning to. But because there is no regulatory enforcement for it to remain, I sense that that is the bigger issue, rather than the transition to a pod-type service that has to be multi-manned to make sure it has consistency. Is the fact that it could be taken away later because of the regulation the real problem? I will go to Katie, then Mick.

Katie Pennick: Yes, the two examples I used, of Bicester and Oxford Parkway, both of which pertain to Chiltern, are the only examples literally duplicating the ticket office approach. The contents of the proposals put forward by all the other operators do not go anywhere near that level of replicating what we have already.

Q92 Paul Howell: Sorry to interrupt, but if you had a situation where that was in some way mandated, would that be better or worse than where we are now, or just about the same?

Katie Pennick: It would be exactly the same. There is no point to any of this. It really is literally a ticket office—just without glass.

Mick Lynch: When we went into the negotiations, we were expecting a modernisation package. We don't have a modernisation package. We have a closure package. There is no modernisation coming in on the back of this. There is no promise of greater accessibility. They need to drop



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these plans. If they want to talk about greater accessibility, different retail measures and different styles of hubs or customer service centres, let's have that conversation; but they are going to be turned into Costa Coffees. I was at Penzance station. Network Rail has already closed the current outlet, which was a family business, in order to bring in corporate multinational companies to sell people very expensive hot drinks that you can get everywhere you go, which is what our country is turning into, in the high street. That is why people are so angry. These are community centres in many towns and villages. I have been up to Berwick. I have been down to Penzance. I have been all over the country. People are going absolutely crackers about losing more, after the banks, the pubs and every community asset has been closed down.

We want an accessible railway that is friendly for everyone. Don't forget, if it is accessible for disabled people, it will be accessible for our foreign visitors—who we want—and for everyone. It will be accessible for women who are fearful about travelling. If we want that modern offer, why have we not got a proposal on it? Even the hours they have are cuts to hours. It is every person for themselves on the railway.

Once the sun has gone down, many people will not want to travel on this railway in the future. That is what we are seeing. It is a fairly apocalyptic version of what the railway will be like. Unsocial behaviour will go up. We are not talking about that today, but if it is accessible for elderly people, people with disabilities and people with learning difficulties, it is going to be great for the rest of us as well because there will be lots of staff around directing us and assisting us. That is what we want, but we have no proposals like that whatsoever. It is just cuts.

Q93 Paul Howell: It is the lack of clarity and specificity, if that is a good word, as to where it is going to finish up in the longer term.

Mick Lynch: And a lack of regulation. You need regulation to make these companies do what the Government, the DFT and policymakers specify.

Q94 Paul Howell: Or at least a framework.

Mick Lynch: You will have an unspecified railway. That is what this consultation is about. There is no specification for what they have to do on any station in Britain, even the biggest ones. They will do what they like.

Q95 Paul Howell: I want to ask one specific question of Mick and then I will come to Louise. In terms of your members and what is being potentially proposed, is there any additional training? Do your teams have the skillsets already if these things are going to happen? Would some engagement be needed in that space?

Mick Lynch: They are committed to retraining people. They are going to make people who have never done safety-critical work do safety-critical work. They are going to make people who have never done ticketing



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work do retail work. We don't know how that is going to work, and that's one of the discussions—

Q96 **Paul Howell:** There will be some training then.

Mick Lynch: They are saying there will be, but we do not know what it will include. What they want to do first is cut the jobs. They want to get on with redundancies as soon as they can, and then make the best of it after they have cleared everyone out.

Q97 **Paul Howell:** Louise, you obviously want to come in.

Louise Rubin: Yes. Perhaps what is getting slightly lost in all of this is that travelling by rail is already incredibly difficult for disabled people. We are talking about how to make it better in the future as if that is what is on the cards, but actually we know it is already dire. Before these proposals were on the table, we spoke to disabled people. Already, 30% of people tell us that they do not think their journey will go as planned; 50% say that rail is inaccessible to them. Another 50% say that staff do not know how to help and support them. It is already bad.

There are 101 things that can go wrong on a rail journey if you are disabled, from lack of information on the platforms, to trains being diverted and to the Passenger Assist that you have booked not turning up. There are 101 things. The issue for us is that removing ticket office staff cannot possibly make that better. Ticket offices do not solve all of the problems, but what they offer is a point of reassurance, somewhere you can go and ask for help when things go wrong. We are just not reassured that there will be enough people walking around the platforms and the concourse to offer that. When we start to look through the proposals, there is nothing to reassure us that travelling by rail is going to become more accessible, when it is already in such a bad place to start.

Q98 **Paul Howell:** My perception is that if you travel in various countries overseas, you can turn up, look at the noticeboard to see what is happening, and almost before you have looked at it there is somebody stood there saying, "Can I help you?" If you were to move to that sort of situation, where you had that level of engagement from staff on the platform, it might be a better place than them all being sat behind glass doors. It is that "if" in the first place, isn't it?

Mick Lynch: But they might only do that for two hours a day, and if you are not there for the two hours you won't get any help at all. That is what they are promising.

Q99 **Paul Howell:** I follow the logic.

Louise Rubin: Unfortunately, it is a very long way removed from what the plans actually set out.

Paul Howell: That is exactly what I am trying to share. There is a different position between the vision and what the plans seem to be



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implying at the moment.

Chair: Can I reassure you that the wider concerns you have outlined about accessibility needs are the purpose of our overall inquiry? We will be looking at those in other sessions.

Q100 **Jack Brereton:** Louise, are there people with specific disabilities who will be more affected than others?

Louise Rubin: From the conversations we have had with disabled people, there are huge concerns about people with visual impairments. As you can imagine, it is much harder, first of all, to use websites or the apps to book tickets online beforehand. Not all of them are compatible with screen readers. Then, when it comes to the ticket vending machines themselves, of course, it is challenging to use those if you have a visual impairment. Many of them do not allow you to zoom in and find the information you need. Many of them use colours, fonts and contrasts that do not work.

The other group we have heard an awful lot from are wheelchair users, who are worried because, oftentimes, the ticket vending machines are not at the right height and they cannot use them. Help points equally, are not always positioned as they should be. Even when the help points are working and in the right place, if there aren't staff on the actual station that you are on to respond to those calls, you are looking at perhaps a 15-minute, 20-minute or half an hour wait for someone to get to where you are and assist you with a ramp or the other assistance that you might need.

Q101 **Jack Brereton:** In terms of the specific issues, are there some stations and some operators that you are more concerned about than others?

Louise Rubin: Yes. Looking through the individual TOC consultations, there are some that stand out. I think Katie has actually mentioned some of them already. East Midlands Railway, for example, said in theirs that ticket offices will close, "but we expect weekly visits"—weekly visits—"from mobile staff at the stations." How does that work if you need to get somewhere in a hurry, which happens to disabled people as well as non-disabled people? Disabled people cannot plan their lives around weekly visits.

Equally, the c2c proposal states that some stations will be completely unstaffed, or staffed for limited hours. Again, are we expecting disabled people to travel for one hour a day? What happens if the trains are not running. That often happens, and we have all experienced it? LNER talked about mobile teams providing assistance "if a booking has been made." What does that mean for our right to turn up and go? It throws it completely into doubt.

Q102 **Jack Brereton:** Do any of our other witnesses have any points on that?

Katie Pennick: I echo everything that Louise has said. With the East Midlands Railway plans, which Louise mentioned, for those weekly visits,



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16 stations have been identified where that model will be introduced. For West Midlands Railway, it rises to 78 stations. I do not see how the claim that there will be greater visibility of staff on concourses and platforms can line up with there being staff for only an hour per week. Are those weekly visits going to be scheduled? Will there be an hour slot when I know I can use that station, or will it be ad hoc—they may appear or they may not? We do not know.

Many other stations will become completely unstaffed on particular days. South West Railway has quite a few stations like that, such as Christchurch, which is set to become unstaffed on Mondays and Sundays. Again, is it a case of disabled people not being able to travel on those days? We do not know. LNR said that there will be mobile teams stationed at customer information centres “at selected stations which have been specifically chosen in locations that are no more than an hour away from each other.” It is completely ludicrous to suggest that disabled people should turn up at a station, call for help, if they can use the help point, and wait up to an hour for a mobile team to come out to meet them. That directly contradicts the contents of the rail operators’ accessible travel policies; it is a condition of their licence to provide timely assistance to disabled people. Disabled people have the right to turn up and go. We have the right to travel spontaneously. We do not know when meetings are going to end. We do not know whether we will be in a place at a given time. We also experience a multitude of other barriers, not just on the rail network but across all forms of transport which may delay our journey and throw plans up in the air. It is absolutely vital that disabled people are able to travel spontaneously and turn up and go and require that assistance.

I have a comment on help points, which have also been proposed as a solution in stations that are set to become unstaffed or visited by a mobile team once a week. At the moment, help points do not work. I don’t know if any of you have ever used a help point, but the chances of you getting help from it are very slim. In fact, the rail regulator, the ORR, which I understand you are speaking to later, has conducted research on this. It found that only 51% of its mystery shoppers were able to successfully get help from a help point. That was if they were able to find it, locate it, if it was working, if they were able to speak to the operator and understand what they were saying and could receive that assistance in a timely manner. That is half of journeys. We cannot be suggesting that help points are an adequate solution when they only work for half the time.

Another thing I would be very grateful if you could put to the ORR later today is the topic of regulation, which we have already touched on. As we have laid out, the situation as it stands is dire. The ORR has only just released research that said that in the year ending March 2023 just 81% of pre-booked passenger assistance requests resulted in all of that assistance being received. That is pre-booked, arranged in advance, with a confirmation email and all set in stone. It was only 80%, so one in five



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journeys resulted in unsuccessful assistance. What that means for me and millions of other disabled people is being stranded on trains that may not be terminating at that station. That is the current situation.

Q103 Chair: I understand, and these are all issues that we are exploring elsewhere in the inquiry. In the interests of time, we need to keep focused on particular topics.

Katie Pennick: To bring it back to the point on regulation, this is the content of the accessible travel transport policies, which is a condition of the franchising agreement. If this is the current situation, what are the ORR's powers to hold train operators to account? If this is what is currently happening, how will those regulatory powers be exercised when things get worse, as they inevitably will?

Q104 Jack Brereton: I want to ask a further question particularly around Transport for London. Obviously, they closed a lot of their ticket offices in 2015. What is the difference between what is proposed here and what TfL have done? Are there any lessons that should be learnt? Mick, do you want to comment?

Mick Lynch: It is very unsatisfactory that they did that. Of course, somebody with blonde hair promised that no ticket offices in London would close. That was a manifesto commitment when he stood for election. He said that none of them would close whatsoever, so that shows how far you can go with some people making promises.

The difference in London is that you have a very simple fare structure that is easy for everyone to understand. Secondly, due to the King's Cross fire we have fire regulations on every sub-surface station, with mandatory regulations, in law, about how many people have to be on duty in the concourse, in the tunnels, on the platforms and all around. If those people are not there, those stations cannot open and have to be closed. You have a completely different regulatory framework.

What you will get with these proposals, as I have said before, are no rules, regulations or requirements at all. I do not think that the TVMs we have spoken about are covered by any regulation. A lot of people are talking about TVMs. I have been told by very senior people in this industry that there will not be any TVMs. TVMs are going to be phased out. They are a temporary measure. The assistance you will get is how to use your phone. If you do not have one, or are not very good with it, you will not get any help at all. You will not be able to buy a ticket.

It might be interesting to ask what their plans are for TVMs, but the maintenance schedules on them have already completely fallen to pieces. They are dilapidated and very often do not work at all. Again, this is a stepping stone to get through the reliance on TVMs, which are sometimes on staircases—in the middle of staircases—but they will not be around at all because it costs money for contractors to come and fix them and for staff to go and reset them and they don't want staff.



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Q105 **Jack Brereton:** The Rail Delivery Group have suggested that they will ensure that those ticket machines are upgraded. Would that help?

Mick Lynch: But is it a requirement?

Q106 **Jack Brereton:** That is what they have said; they want to see them improved.

Mick Lynch: But the Chair told us that they would not be shutting the ticket offices, and that there were no plans.

Katie Pennick: Can I come in on the—

Q107 **Jack Brereton:** I think you have come in enough. We want to ask some of the other witnesses some questions. In terms of the other issues that I was going to ask you, Mick, you mentioned modernisation. What was your view in terms of modernisation? What should that have looked like, in your view?

Mick Lynch: We have not had a modernisation proposal, but any proposals have to take on board the social model of accessibility and disability. It has to have an updated retail offer, where you can buy tickets and permits for your journey at the station. If you do not have that, we will have de-staffed stations. If they want to talk about how we will update retail, we can do that. We have updated retail, but what they are doing already is limiting what can be sold on ticket office machines. They are not updating those. We already have a limited amount that can be sold.

Everyone you speak to will say that they prefer the interaction with the ticket clerk because they get better value. You have to remember that, when it is all done through apps, AI and algorithms, the train companies will be able to sell you the tickets that they want you to buy, and not the one that you may need or which may be better value. You get that from human interaction. They want to take the human out of this, so that they can just download to you the ticket they want you to buy and make you take the journey that they want you to take.

Q108 **Jack Brereton:** In terms of Age UK, is there a particular barrier relating to the current technology of some of those ticket machines?

Christopher Brooks: Yes, it is a huge barrier for people. As I have said already, no matter how intuitively designed the TVMs are, there are still over one in five over-65s who do not use the internet.

Q109 **Jack Brereton:** And there are no upgrades or changes that could be made so that they are to a standard where everybody could use them. Is that the case?

Christopher Brooks: Yes, I think so. If you are not familiar with using technology and computers, you cannot really be expected just to turn up in a station and use an automatic machine to help you choose the right



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fare, especially with the complex fare structure we have. Maybe that is a reform that needs to be looked at first.

Human assistance is really important for people as well. If you are offline, people are more dependent on that personal assistance. It is not just the one in five who are offline. Over half of over-65s are narrow internet users, so they can only do a limited range of activities online. They will find it very challenging as well. A significant number of people—millions of pensioners—will find it very difficult if we go down a more automated route. It will obviously have the impact that it will put some people off travelling altogether, whereas others will probably travel less and their lives—

Q110 Jack Brereton: Do you have any data on that and how many people may have suggested that this will put them off travelling altogether? Have you been able to collect any information on that?

Christopher Brooks: No, I don't have any information. I have just heard anecdotally from people contacting us saying that they would find it very difficult to travel. I do not think it has been quantified anywhere. There are about 2.5 million pensioners who are offline. Even if it just puts off a small proportion of those people from travelling, you could easily see how it could cost hundreds of thousands of journeys a year, potentially.

Katie Pennick: On that comment—

Chair: Sorry. If we have time at the end we will come back, but I have other colleagues who would like to ask questions.

Q111 Karl McCartney: My colleague, Jack, just asked the question I was going to ask of the panel, so I will ask something else and then come to you, Mick. Specifically, have your organisations done any polling of your members, or do you have a figure for journeys that might not be made on the railways should the worst-case scenario happen and all these changes be brought in? Do you have any idea of figures?

Louise Rubin: We have not asked exactly that question. We have asked a number of questions about the impact. Of the people who told us that they would find ticket vending machines inaccessible, the largest majority—around 80%—told us that it is because they do not know what fare they need or what ticket they need. They get that information from going to a ticket office. For the rest, about 10% told us that they depend on cash. We know that disabled people, more than non-disabled people, rely on cash. It is often harder to get access to a bank account. There were big concerns among the 10% who were worried that they would not be able to use cash, and that they do not have a contactless approach. Five per cent. told us that ticket vending machines are at the wrong height for them. Another 5% told us that they cannot see, zoom in or read the machines themselves.

Q112 Karl McCartney: Specifically on that question, Katie.



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Katie Pennick: It is good to see that our research matches up. We found very similar things in research that we have done: 12% of disabled people use the ticket office to buy their tickets when using rail; 10% use cash; 37% of disabled people have faced barriers to rail due to low staffing in the last year alone; and 36% experienced issues with booking or receiving assistance in the past year. That is obviously something that is heavily tied to ticket offices and staffing ability.

Q113 **Karl McCartney:** Chris, I am not going to come to you because you were just asked. Mick, surprisingly, we might be on the same side of this issue. In a more general sense—you and your members know the railways perhaps better than most—what are your feelings? If all of these changes went through, what do you think will be the downturn? There is not going to be an upturn in people using the railway. The bottom line is that it is about money. We want to get more people using the railways.

Mick Lynch: I think we are going to have what might be a hostile environment, and not just for disabled people with physical impairments and pensioners. You have to remember that there are lots of people with learning disabilities. The blind groups are not represented here today. I have seen them out on the demos and the activities. They are up in arms about this. The guidance and understanding they get from staff, almost one to one when they are regular travellers, cannot be underestimated.

I think this is a dash for cuts. It will affect our people. That may not be your concern, but it will affect—

Q114 **Karl McCartney:** Is there a percentage of journeys that are made today that perhaps will not be made in the future, and not just by disabled people?

Mick Lynch: We should be looking for growth so that all people can feel that the railway is theirs and it is an environment that they can trust, as well as the buses. It is all of these public transport things. We should be looking for people to be less locked into their houses and their own lives and getting out into communities, playing a full role. We hope that our members can serve those people and be part of that accessibility drive. That is where we should be looking.

We think this is just a means by which you can cut staff and the consequences have not been thought through. Nobody is looking at a new transport system that is modernised, using technology as a friend to people rather than something that is going to obstruct them. The groups that we have met are completely hostile to these proposals. They want the opposite. If we want a modern railway, let's modernise it and not go back to the de-staffing that we have had in many situations already.

Q115 **Karl McCartney:** You want to make it welcoming.

Mick Lynch: Exactly, yes.

Q116 **Grahame Morris:** I know we are under a bit of time pressure, but I want



to ask Katie about the letter the Committee received from the Rail Minister on 10 September about the issue of ticket office closures. There are at least two things that struck me. One is the fact that he acknowledges that ticket offices are not just used to purchase tickets. One of the reasons given is that only 12% of tickets are bought through ticket offices, but he acknowledges that people go there for advice, assistance and so on. I think that is a positive.

A little later on he refers to the ticketing and settlement agreement, the TSA. I took note of the point that the panellists, including Mick, made about schedule 17 being the only statutory protection. I am thinking about what we, as a Committee, can do in terms of making recommendations to Government. If they are going to press ahead with some form of redeployment, or whatever they are going to call it, should we be seeking to reinforce the ticketing and settlement agreement with operators?

Katie Pennick: That is a really good question. I noted something that struck me in that letter. As you identified, the Minister talks about the fact that the ticket office plays a role far beyond just selling tickets. He said that the Department does not hold data on the number of customer interactions between customers and staff that are not retailing interactions. I don't see how this can be pitched as a case of improving a service when there is no data on the current level of service. I think there is a bit of a gap there.

With regard to schedule 17, as we have talked about already quite a bit, the staff at the ticket office are the only staff who are regulatory and meant to be there. The only thing that we could see that would be acceptable would be amending that—I believe it is the Railways Act, but I am not entirely sure—to ensure that the current level of staff remains the same. Again, we go back to the point of what on earth the point is in all of this.

I think it is really important. Perhaps that is something you could also put to the ORR in terms of what other regulatory powers they have in ensuring that staffing levels are maintained. We have already talked about how the current situation is dire. I have given examples of stations I have seen that have already reduced their staffing levels and have already closed their ticket office. From our point of view, we would like to see an increase in staff. That is what we are fighting for. That is what is so demoralising about this entire conversation. My best-case scenario in all of this is that things do not get worse but we will not have secured progress.

Q117 **Grahame Morris:** I can empathise with your experience. I missed the Transport Select Committee last Wednesday because I was on an HS2 visit to the viaducts and tunnelling system. Chiltern Railways were excellent; the trains were wonderful, lovely and clean. I bought my ticket at Marylebone and when I tried to get out at Rickmansworth there weren't any staff around and I had to climb over the barrier, which is no



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mean feat for me because I've got two bad knees. There is nobody to help, is there?

Katie Pennick: It wouldn't have been possible for me.

Q118 **Gavin Newlands:** I have two quick yes/no questions because I am conscious of the time. I assume you will be aware that last year ScotRail had a similar consultation with regard to ticket offices, although they only proposed to close three ticket offices in Scotland. The consultation occurred and a similar response was received. It was listened to and the closures were reversed.

First, do you have similar confidence that the UK Government will listen to the results of the consultation, as happened in Scotland? Secondly, during an urgent question before recess I asked the Minister why the Avanti ticket office at Glasgow Central was being closed, whereas the LNER ticket office in Edinburgh was remaining open. There was no real answer to that. As far as I understand it, more than double the amount of tickets are bought at the office in Glasgow as at Edinburgh, yet the Edinburgh one is remaining open. Do any of you understand why that decision has been made?

Katie Pennick: Very quickly, no, is the short answer. I do not have trust in the Government to listen to the responses of the consultation, particularly around the fact that this directive seems to have come from the Department itself. As we know, the consultation has ended. It is currently with the passenger bodies to make a decision. If an agreement cannot be reached between the passenger bodies and the operators, it gets escalated to the Secretary of State, which I believe is a case of marking one's own homework.

Q119 **Gavin Newlands:** Do you have any idea about Glasgow ticket office?

Katie Pennick: I do not know about the Glasgow example, I am afraid.

Q120 **Gavin Newlands:** No; nobody knows.

Louise Rubin: Unfortunately, no, it appears to be a done deal and I hate to say it. The only hope that we have at the moment is that the two watchdogs will do a good job of going through those thousands and thousands of consultation responses, pushing back on the mitigations that the TOCs have suggested, and making them stronger and making them viable, but in terms of this going ahead, I think it is going to happen.

Mick Lynch: One station is FirstGroup and the other is the office of last resort—not last resort, whatever it is called, although maybe it is the last resort. On the process, I don't have much faith. The process is not designed for this level of closure. We have only closed 23 ticket offices in the last 10 years. It is normally about sections, about limited areas. You could then see that the watchdog could do a decent job, with mitigations along a route. If you are virtually closing all of the ticket offices and you get three quarters of a million responses, it means you have to think



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again anyway. You have to stop what you are doing because nobody is supporting it. They are not getting three quarters of a million responses saying, "Please close my ticket office." They have to stop and take a breath.

These watchdogs are completely overwhelmed. They said, "Do not do this closure programme in this way. Go in swathes, if you have to do it, but we cannot staff or resource it." That is why they are having to extend. The whole process is flawed. I think it needs to be halted.

Christopher Brooks: I don't disagree with my colleagues, but I am going to be more optimistic. I do not think that the groundswell of opposition was anticipated and I think it has turned it into a far more political issue than they had initially envisaged. The Government could probably do themselves a favour and listen to what people are saying. I think they could help themselves a lot if they paid attention to the Committee and maybe to organisations like ours as well. I am sure they have been inundated and that MPs at constituency level have received a lot of correspondence about it. I have not given up hope.

Gavin Newlands: Apologies, Chair. No further yes/no questions.

Q121 **Chair:** I have one quick question for clarification. It is something I want to put to the train operators later, in their session. It is your point, Mick, about them wanting to phase out ticket vending machines. You said the contracts for maintenance were being phased out, and that was a reason why you think they are not going to be there for much longer. To clarify, is that for the existing machines? I am aware of lots of new types of ticket vending machines that are coming onstream. For example, Northern, at Leeds, has an interactive one.

Mick Lynch: There will be new machines and there will be updates, but in the long term I think they will find it an overhead, and it will go the same way as air travel. With Ryanair or easyJet, it is almost like you have a job with them when you try to book a flight. That is the future view of the railway. The less infrastructure you have, the better, because it is cheaper.

Chair: We will be putting that point to them later on. For now, I thank you all very much indeed for your time this morning.