



Department
for Transport

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From the Minister of State
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11th September 2023

Dear Iain,

Thank you for your letter of 27 July regarding your Committee's inquiry into accessible transport and the train operator consultations on ticket offices.

You have asked a number of questions, which we have responded to below. The rail network is at an important juncture where it needs to be reformed and modernize to simplify and improve the passenger experience alongside achieving a railway that is both financially and operationally sustainable. This goal underpins all the reforms being developed by the industry.

Taking into account the outcome of the industry-led consultation, which closed on 1 September, it is important that we continue to work with industry to modernize the passenger experience. Train operator proposals look to move staff from behind the ticket offices screens to provide more help and advice in customer focused roles around the station, and additional support to those who need it. Station reform is an important step in enabling staff to provide more flexible, agile, and personal service and bring the rail network forward to meet the standard that passengers deserve.

I would like to add that I have been involved in several parliamentary debates, responding to ministerial correspondence and parliamentary questions on the industry-led consultation and will continue to do so.

Analysis of ticket office use

1. You have told us that “about 12 per cent of all transactions take place through a ticket office”. How many transactions is this per hour of opening? How has this changed over time?
2. What analysis has the Department done of the volume of ticket office interactions which would not be counted in the 12 per cent figure? How many customer interactions per hour do ticket offices conduct?
3. What assessment has the Government made of the volume of customer interactions between customers and staff when ticket offices are a) open and b) closed?
4. What analysis has the Department done to break down a) the characteristics of customers who buy tickets from ticket offices and b) geographic variation in levels of usage of ticket offices? How many passengers exclusively purchase tickets from ticket offices?
5. What ticket types and fares are not universally available through ticket vending machines?
6. What analysis has the Department done of how much of the 12 per cent is made up of transactions which could not take place at a ticket vending machine, either because a specific product or transaction is not available, the customer was using cash, or because the ticket vending machine is inaccessible to the user?
7. What assessment has the Department made of the number of customers who are unable to use a) ticket vending machines and b) online ticket purchasing?

In 2022/23, around 1 in 10 transactions occurred at a ticket office, this is down from around 1 in 3 a decade earlier and equates to 13% of total revenue. In transactions terms, ticket office transactions are estimated to have fallen from 175 million in 2012/13 to 75 million in 2022/23. Analysis has also shown that the least used ticket offices averaged less than one transaction per hour last year.

The department does not hold data on the number of customer interactions between customers and staff.

We recognise that ticket offices are used for a variety of reasons other than buying tickets, and passengers want and need someone able to provide more support such as journey information and assistance to those who need additional support. We want to free station staff from being limited by staying behind the ticket office screens so they continue to provide these additional services with a more personalised and customer focused approach. Train operator proposals should allow staff to move around the station rather than being restricted to just selling tickets from a ticket office window.

Research conducted by the department in 2021¹ on the experiences of disabled non-users of rail shows that 19% of the respondents reported ticket

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1082490/research-on-experiences-of-disabled-non-users-of-rail.pdf

offices not being open for ticket purchase was something that had prevented or discouraged them from travelling by train. However, research among disabled rail users, conducted in 2019², found that passengers also experience challenges when purchasing tickets from a ticket office. These include: the ticket office counter not being at a height suitable for wheelchair users; a lack of space or a shelf for luggage or mobility assistance; the presence of security screens that can be a sound barrier for passengers who are deaf or have a hearing impairment; and, ticket offices not always being open. Some of these disabled rail users reported that purchasing tickets online was preferable as it was perceived to be less stressful and the passenger would have a choice in how to buy the tickets. The department continues to build on its research to better understand the passengers' characteristics and preferences.

Ticket office usage varies from one location to another. When suggesting changes to the opening hours of ticket offices the train operators must follow the TSA and conduct a station-by-station assessment of the impact of the change on passengers.

Industry informs us that an estimated 99% of all transactions made at ticket offices last year could have been made at ticket vending machines or online. However, we do recognise that there are a small number of products that currently cannot be bought at ticket vending machines, and that their capabilities vary across the rail network. For example, we know that warrants and rail vouchers are not currently accepted by them. Other fares such as boundary fares and some season tickets cannot consistently be purchased at all ticket vending machines nationally at this time.

Industry is considering the current range of non-digital products and transactions and is identifying solutions to address these issues. Work includes improving ticket vending machine functionality, the digitisation of more ticket types and changes to rail industry policy and processes.

The majority of ticket vending machines accept cash, though of course availability varies by station.

Passengers will not be expected to travel out of their way to buy a ticket and will be able to buy en-route or at their destination.

The above-mentioned research on the experiences of disabled rail users³ reported that one of the challenges encountered by disabled passengers

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814862/experiences-of-disabled-rail-passengers.pdf

³https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814862/experiences-of-disabled-rail-passengers.pdf

when buying tickets is in using ticket vending machines (TVMs), the most common anticipated problem being difficulties in using the ticket machines. Ticket vending machines being out of order, and the accessibility of ticket vending machines were also mentioned as barriers to ticket purchase by disabled non-users of rail (mentioned by 14% and 13% respectively)⁴. Difficulties on buying tickets on smartphone apps was also reported by 33% of them. The department continues to build on its research to better understand the passengers' characteristics and preferences.

Role of the Department

8. Does the Department believe train stations need ticket offices?
9. What assessment has the Department made of the number of current passengers who will stop using the rail network if the proposed changes were implemented?
10. What direction was given or expectations set by the Department to the Rail Delivery Group and the train companies about the a) scale and b) type of changes to be reflected in their proposals? Have you set a targeting saving you expect these changes to achieve?
11. Were the specific changes proposed by operators discussed with or approved by your Department before they were published?

At present, I believe that ticket office staff are underutilised. Enabling ticket office staff to move from behind the screens into new multi-skilled roles providing additional face-to-face support to whom and where is most needed, could be an opportunity to make better use of taxpayers' money, given the current unsustainable subsidy levels.

These reforms will bring stations in line with what customers expect from other modern and responsive services, including supermarkets and banks, where customer assistants help with information, provide support where it's needed and assistance in making digital transactions on the shop floor. Multi-skilled staff will be on hand at all currently staffed stations, assisting those who need additional support or who cannot or do not want to use contactless or digital tickets, and helping passengers with their onward journey.

The Department has made no assessment of whether the public would be disincentivised to travel by rail as a result of industry proposals on ticket offices. However, a key aim of the proposed reform is to improve the passenger experience and therefore maintain and attract passengers.

The Rail Delivery Group proposed a range of reforms to the Department. Individual Operators then considered these proposals and applied them to their specific business. In accordance with the Operator Agreements the

⁴https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1082490/research-on-experiences-of-disabled-non-users-of-rail.pdf

Department then authorised Operators to commence consultations on stations reform in accordance with the TSA process. When authorising Operators to commence TSA consultations, the Department set out a range of parameters with which an Operator's proposal must comply. Operators then took action to consult on ticket office changes in line with the rail industry's Ticketing and Settlement Agreement (TSA). The Department has not approved any proposal put forward by an Operator and will not do so until consultations are concluded.

The proposals

12. If the proposals set out by the train companies were adopted in full, at how many stations across the whole network would hours of staff presence be fewer than they are currently? In percentage terms how much would overall staffing hours fall?
13. If the proposals set out by the train companies were adopted in full, how many stations which currently have some staffed hours would become completely unstaffed? How many would lose a permanent staffing presence at a specific period in time during the week that can be relied upon by customers?
14. How many stations would lose access to a ticket office in peak time? How many would now be unstaffed during peak time?
15. At how many stations where ticket office hours are proposed to be reduced or removed is access to other facilities such as toilets currently linked to ticket office hours?
16. Under the proposals, how many stations will be staffed by mobile teams operating between multiple stations? Would such mobile teams have fixed hours at each station or would their presence be on an ad hoc basis?
17. Will the hours for which mobile staff are available at stations be subject to regulation in the same way as ticket office hours currently are?
18. If a customer needs assistance, how long should they expect to wait before a member of a mobile team is able to help them? How would a customer access this assistance?

The consultation exercise is industry led, and we would anticipate that train operators have acted in accordance with the TSA. This requires operators to consider the impact of their proposals on all passengers.

The proposed changes vary between individual train operators and at their stations involving proposals for changing current ticket office opening hours and/or for changing current working practices of station staff. The Government is not in a position to predict the outcome of the consultations.

Following the end of the consultations, the independent passenger bodies will now play a vital role in assessing and shaping proposals. Train operators have entered into discussions with the passenger bodies to take account of the feedback received through the consultation responses. We expect train operators to work collaboratively with the passenger bodies in the coming weeks, listen to the concerns raised and to refine their proposals accordingly. We recognise that TOCs will also be discussing employment matters with trade unions as part of their own collective bargaining processes.

The Department has no role in the TSA process unless objections cannot be resolved between the train operator and passenger body and are referred to the Secretary of State for a decision. If called upon to make a determination on a specific ticket office proposal, the Secretary of State will follow the TSA process alongside the relevant guidance and will take into account the equality implications of the proposal.

I have been clear that no currently staffed station will become unstaffed as a result of industry changes, and operators should ensure that staff are well located within the station as needed to meet passenger needs in future. This includes ensuring that staff are available to assist those who need additional support or do not wish to use digital tickets.

The consultation process

19. Did the Department consider mandating an alternative form of consultation to that set out in the Ticketing and Settlement Agreement?
20. On how many occasions has the consultation process set out in the Ticketing and Settlement Agreement been used for changes affecting a) more than one operator and b) more than five stations at one time? How often has it been used to close a ticket office?
21. Which accessibility groups attended roundtable discussions with the Department prior to the launch of the consultations? What feedback did they give? What changes were made as a result to a) the proposals and b) the consultation process?
22. What steps has the Department taken to assure itself that the consultations are accessible to all?

The Department did not consider mandating an alternative form of consultation because the Ticketing and Settlement agreement applies. The Department fully respects the TSA as a long-standing industry process. The TSA is an agreement between train operators and Rail Delivery Group and we would not seek to mandate an alternative to the consultation process it outlines, which has been in place since 1995. The accompanying TSA Ticket Office guidance sets out the Secretary of State's expectations if a proposal is referred to him for a decision.

In the last 10 years only 23 offices have closed, despite the significant change in passenger behavior in respect to purchasing tickets. Of stations managed by DFT contracted Train Operating Companies, 57% have ticket offices. Of those, approximately 70% transacted 12 transactions or fewer per hour, on average, in 2022/23.

The TSA Major Change process must be used every time a train operator proposes to close a ticket office. The process is completed on a station-by-station basis and will always involve consulting other operators who are affected by the change in addition to the public.

The Department, in partnership with industry, held roundtables prior to the consultations launch on 5 July and has subsequently held roundtables during the consultation period with accessibility and transport groups. These include the following groups and people that were invited:

- 3 Nations Dementia Working Group
- Age UK
- Campaign for Better Transport
- Community Rail
- Disabled Person's Transport Advisory Committee
- Disability Rights UK
- Equality Trust
- Equality and Human Rights Committee
- Guide Dogs
- Leonard Cheshire
- London TravelWatch
- Mencap
- Multiple Sclerosis Society
- National Autistic Society
- National Federation for the Blind
- Parkinsons UK
- Railfuture
- Royal National Institute of Blind People
- Royal National Institute for Deaf People
- Scope
- Sense
- Thomas Pocklington Trust
- Transport Focus
- Transport for All
- Urban Transport Group
- Whizz-Kidz
- Women's Aid

Under the TSA process all operators are required to have taken the necessary steps to provide information to passengers a station-by-station basis so they can comment on proposals, this is via posters. TOCs have also displayed this information on their websites on a station-by-station basis.

Train operators extended the ticket office consultation period by five weeks, until 1 September. We were pleased that operators listened to feedback following continued engagement with stakeholders, including accessibility groups. This extended consultation period gave to all users of the railway, including older and disabled passengers, more time and greater opportunity to respond.

All train operators published their Equality Impact Assessments for their proposals on their websites. Operators took considerable steps to ensure the availability of consultation materials in a variety of accessible formats. All operators for example, made their consultation materials available in large print, audio versions and Web Accessible digital formats.

The decision-making process

23. How will Ministers decide whether proposed the proposed closure of specific ticket offices can proceed? What criteria and principles will be used?
24. In your oral evidence to us on 19 January 2023, you said that “Any decisions on closures have to be done via the ticketing and settlement agreement. There will have to be an impact analysis of what that would mean for passengers, and then those decisions would be made.” Has this impact analysis been completed, will it be published, and will you provide a copy to the Committee? Will this be done for each individual station, for the network as a whole, or both?

Now the public consultation period has ended, the independent passenger bodies – Transport Focus and London TravelWatch - will play a vital role in assessing and shaping staffing proposals. During this period, the passenger bodies are engaging with operators on the responses they have received and the criteria they have set out.

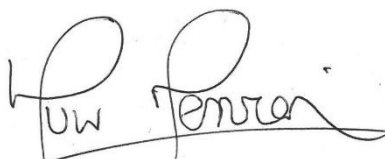
We expect to see operators develop and adapt their proposals where needed in response to points raised in the consultation. Where agreement cannot be reached between operators and the passenger bodies, individual cases can be referred to the Secretary of State, for a decision.

At this point it is for the Secretary of State to take into consideration the factors outlined in the TSA, the Ticket Office Guidance and the equality assessments and decide on the proposal. The Ticket Office Guidance can be viewed here <https://www.gov.uk/government/publications/secretary-of-state-for-transport-ticketing-and-settlement-agreement-ticket-office-guidance/secretary-of-state-for-transport-ticketing-and-settlement-agreement-ticket-office-guidance>

This means, The Secretary of State will consider what impact the proposal has on staffing, revenue protection, retail, safety, security, and the impact on passengers with protected characteristics.

Thank you once again for your letter. I hope this response has been helpful.

Yours ever,

A handwritten signature in black ink, appearing to read 'Huw Jones', written in a cursive style.

HUW MERRIMAN MP

MINISTER OF STATE FOR TRANSPORT