



Transport Committee

Huw Merriman MP
Minister of State
Department for Transport

By email

20 October 2023

Dear Huw,

The future of rail ticket offices

On Wednesday 13 September, we held an evidence session focusing on proposals to close ticket offices across the rail network as part of our ongoing inquiry into 'Accessible transport: legal obligations'. We also re-opened our call for written evidence to enable organisations and members of the public to tell us their views on the ticket offices consultation, and we have published those submissions.

In both written and oral evidence, we have heard numerous concerns regarding both the consultation process for the ticket office changes, and the proposals themselves, in terms of what they will mean for disabled people travelling on the rail network. Our inquiry will continue over the coming months and we will report in due course, but we wanted to take the opportunity to present to you our reflections on this specific issue before the point at which Transport Focus and London TravelWatch give their responses to the proposals.

The consultation process

We understand the reasons why the process set out in Ticketing and Settlement Agreement as mandatory for these consultations, as set out in your letter to us of 11 September. Nonetheless, we do not consider it a sufficient mechanism for a network-wide change of the proposed scale. Anthony Smith, Chief Executive at Transport Focus, told us that the Ticketing and Settlement Agreement "has been used in the past, either for individual stations or for five train companies when there were changes across their ticket office estate, but never anything quite on this scale" and he did not believe it "was ever designed for something of this magnitude."¹ We heard concerns that a consultation format based on comments about individual stations was not adequate for capturing network-wide issues, and does not reflect how people travel. More consideration should have been given in advance to whether a more appropriate consultation mechanism could have been agreed upon.

We heard from multiple witnesses that the consultation documents alternative formats (e.g., audio, Easy Read, British Sign Language etc.) available were not consistent across the various train operators. We were told by Katie Pennick, Campaign and Communications Manager at Transport for All, that

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.²

¹ Oral evidence taken by the Transport Committee on 13 September 2023, [Anthony Smith] [Q124, 127](#).

² Oral evidence taken by the Transport Committee on 13 September 2023 [Katie Pennick], [Q75](#)



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We were also told by Richard Allan, Chief Executive at Chiltern Railways, in a letter following the session, that the Rail Delivery Group did not advise operators prior to the launch of the consultation on the need for multiple alternative formats of the proposal documents and it did not instruct operators to make some formats available until very late in the consultation period (the letter states that operators were not instructed to include an Easy Read format until 10 August 2023).³

Given that the timing of this consultation was entirely in the gift of the operators and that the proposals had clearly been in preparation for some time, the inconsistency and inaccessibility of the consultation materials was unacceptable. It was also easily foreseeable that the three-week period set out in the Ticketing and Settlement Agreement would be inadequate and should have been treated as a minimum which as a matter of good practice the operators planned to exceed. This was only belatedly recognised through the extension of the initial consultation period.

The Rail Delivery Group clearly played a role in coordinating the consultations, and should have been better prepared, and given better advice to operators, on both the timescale and the presentation of information.

We were reassured by the approach being taken by Transport Focus to the consultation and we are confident that its analysis will be undertaken thoroughly and with expertise. We are, however, concerned at the size of the task ahead given the huge number of responses received, and ask you to ensure that Transport Focus and London TravelWatch have adequate resources and time to complete it.

Lack of transparency of proposals

The lack of information and analysis made available by operators, the Rail Delivery Group and, especially, the Department for Transport, about the cumulative impact of the proposals on the rail network has been unacceptable. Campaigners and individuals have been left to do the considerable detective work of checking whether claims made by operators stack up against the detail of the proposals. Both your Department and train operators have maintained that such analysis would pre-empt the consultation outcome; we put multiple questions on these points to you in our [letter of 27 July](#), which were not answered on that basis. We see no reason, however, why an analysis of the effect of the proposals *if adopted* could not have been produced. This would have assisted in informing the consultation.

It appears from your recent comments to the Committee about the proposals that perhaps even Ministers were taken aback by the details once there had been sufficient time to work out the implications.⁴ Better information up front, in particular about the overall proposed reductions in the hours for which stations are staffed (not just ticket office opening hours), would have served everyone involved in the process. The lack of consistency in how proposals were presented by individual operators on their websites also mitigated against gaining a network-wide understanding.

We also heard justified concerns that operators had not given sufficient information in their proposals to allow the potential merits of a new approach to be fairly assessed. A wide variety of role names and team configurations are being suggested as replacements for the well-

³ [Letter from Chief Executive of Chiltern Railways to Transport Committee Chair](#), published 20 October 2023

⁴ Oral evidence taken by the Transport Committee on 6 September 2023 [Huw Merriman MP], [Q97](#)



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understood ticket office. Stephanie Tobyn, Director of Strategy, Policy and Reform at the Office of Rail and Road, told us:

I genuinely do not understand some of the proposals that have been put forward. I do not think there are answers yet to some of the proposals, so already we are starting to think, “Well, how would that work? That wouldn’t fit with what we think should be done under the accessible travel policy.” I cannot understand how a team could turn up at a prescribed time at a station once a week. I cannot understand how that would facilitate turn-up-and-go assistance.⁵

The potential effect of the proposals on disabled travellers

It is clear from the evidence we heard from operators that the overall rationale for these changes is based on the behaviour of the majority of passengers. To some extent, that is reasonable: in aggregate, the way passengers interact with ticket retail has changed significantly over recent years, and it is rational to consider how resources should be allocated differently in response.

This is not necessarily, however, a sufficient approach for safeguarding the needs of a minority of passengers who have legitimate concerns about whether closing a ticket office would remove the support they need—whether with ticketing, information, safety or access assistance—to travel freely and reliably on the railway to the same extent as everyone else.

We have heard many reasonable questions raised about the practicality of alternative staffing arrangements and alternative retail arrangements for people with all kinds of disabilities. For example, people with mobility impairments or energy-limiting conditions are concerned about having to roam around to find a member of staff; people with visual impairments wonder how they will readily identify a member of staff who is not at a fixed position; people with hearing loss may need to use the hearing loops installed at ticket offices; people with learning disabilities are worried about not knowing where to find staff and often prefer to speak to a person rather than use a machine; Help Points are often out of reach or simply out of order; and there is a wide range of reasons why people cannot use ticket vending machines, such as dexterity impairments, visual impairments, a need to use cash or being incorrectly positioned for wheelchair users. This list is not exhaustive.

It is also perplexing that these proposals have been put forward before the simplification of ticketing promised by the Williams-Shapps Plan for Rail, which would be an enabler of alternative arrangements. We were told by Christopher Brooks, Head of Policy at Age UK that the current complex fare structure is a barrier for many people when purchasing rail tickets online or at a ticket vending machine. He stated:

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 fare, especially with the complex fare structure we have. Maybe that is a reform that needs to be looked at first.⁶

We note that in [your letter to us of 11 September](#) you said that ticket office transactions are estimated to have fallen from 175 million in 2021–13 to 75 million in 2022–23. This is of course a substantial change, but the volume of such transactions is still very significant.

⁵ Oral evidence taken by the Transport Committee on 13 September 2023, [Stephanie Tobyn], [Q151](#)

⁶ Oral evidence taken by the Transport Committee on 13 September 2023, [Christopher Brooks], [Q109](#)



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It is concerning that operators were not able to provide us with a demographic breakdown of the passengers who currently purchase their tickets from ticket offices, so it does not seem possible to accurately estimate how many of those passengers would be able to transition to purchasing their tickets without access to a ticket office. The evidence we heard from disabled people's organisations, and the written evidence we received, give little confidence that the needs of these passengers are properly understood by operators. For example, we were told in written evidence by the Royal National Institute of Blind People (RNIB) that:

At the moment, ticket office staff must compensate for the lack of comprehensive inclusivity in rail travel.

Before there can be any consideration of removing staff from ticket offices, the support these staff provide would have to be reliably and accessibly available by other means. No matter how perfect digital accessibility becomes, there will always be a need for staff to be present to assist people for whom the technology isn't available or suitable.

The entire experience of rail travel — journey planning, ticket purchase, station navigation, emergency help, and safety at stations, among other aspects — would first have to be investigated and overhauled in a way that removes the barriers that disabled people, including blind and partially sighted people, currently face. Closing ticket offices under the current proposals would not remove any of these barriers for blind and partially sighted people and would instead add new ones.⁷

Your [letter to us of 11 September](#) also reveals that there is no overall data on customer interactions with staff other than for ticket purchases, which our evidence tells us are immensely valued by passengers.

We therefore consider that the proposals as put forward by train operating companies in this consultation go too far, too fast, towards a situation that risks excluding some passengers from the railway. At a minimum, changes this radical should be carefully piloted in limited areas and evaluated for their effect on all passengers before being rolled out. This would allow for the alternative proposals, which at present are too vague, to be properly understood.

We hope and expect that the consultation will ultimately lead to much better proposals that will reflect the needs of all passengers. We are encouraged by your own insistence that that no currently staffed station will become unstaffed as a result of industry changes, and that whatever emerges from this process must ultimately provide a better service, not a diminished one. I would be grateful for a response addressing the concerns we have raised by 15 November 2023.

Kind regards,

Iain Stewart MP
Chair of the Transport Select Committee

⁷ Royal National Institute of Blind People (RNIB), [Written evidence submitted to the Transport Committee](#), published 5 September 2023.