

## Re: Objection to ticket office closure proposals

Dear London Travelwatch and Transport Focus,

We write as a coalition of organisations who strongly oppose the proposals to close ticket offices in England. Together, we represent the 14.6 million disabled people in the UK, their allies and all who will be impacted by these proposals. While we write as experts by experience on disability, we urge the passenger bodies to consider the impact on all protected characteristic groups.

We object to these proposals in the strongest possible terms. Our response concerns plans to close ticket offices at all stations managed by the following Train Operating Companies:

Avanti West Coast	Chiltern Rail	c2c	East Midlands Railway	Greater Anglia
Great Northern/ Govia Thameslink	Great Western Railway (GWR)	LNER (London North Eastern Rail)	London Northwestern Railway	Northern
Southeastern Rail	Southern	SWR (South Western Railway)	TransPennine Express	West Midlands Trains

We object on the grounds that these changes will make the stations and their services inaccessible to disabled passengers. The ticket office is one of the most vital accessibility features of these stations; it impacts everything from the ability to buy tickets, receive assistance, access site facilities, navigate the station, plan routes, and feel confident in making journeys. Furthermore, we are shocked by the level of destaffing contained within these proposals, which we believe will severely curtail disabled passengers' ability to Turn Up And Go.

These proposals represent a deterioration in the quality of service received by disabled people and would likely violate both the Equality Act (2010) and the Secretary of State for Transport's Ticketing and Settlement Agreement ticket office guidance.

The mitigations that have been proposed by train operating companies are piecemeal and inconsistent and fail to adequately address the disastrous impact closures will have on disabled passengers.

In the accompanying pages to this letter, we have set out the mitigations proposed by each train operating company and why they are completely unsuitable.

**We urge you to object to these proposals in their entirety.**

Yours sincerely,

Transport for All

## Signatures

Sense  
Equality Trust  
Wheels for Wellbeing  
AgeUK London  
RMT (National Union of Rail, Maritime and Transport Workers)  
Action on Disability  
DPAC (Disabled People Against Cuts)  
Transport Action Network  
Family Friendly Trains  
Greater Manchester Coalition of Disabled People  
Buckinghamshire Disability Service  
Scope  
RNIB (Royal National Institute of Blind People)  
NAS (National Autistic Society)  
Colostomy UK  
Living Streets  
Camden Disability Action  
Sustrans  
Pathfinders Neuromuscular Alliance  
Surrey Coalition of Disabled People  
Ealing Community Transport  
Nottinghamshire Disabled People's Movement  
National Federation of the Blind (Nottingham Branch)  
Toucan Diversity CIC  
METRO-GAD Greenwich Association of Disabled People  
Thomas Pocklington Trust  
Community Transport Association  
Disability Poverty Campaign Group  
WinVisible  
Guide Dogs  
Inclusion London  
RNID (Royal National Institute for Deaf People)  
MyVision Oxfordshire  
Advanced Transport Research Ltd.

Disability Rights UK  
Chronic Illness Inclusion  
Sisters of Frida  
Culture Access  
Blue Badge Access Awards  
Equal Lives  
28 Too Many  
Level Playing Field  
One Place East  
Parkinson's UK  
Learning Disability England  
Celebrating Disability  
Macular Society  
Centre for Accessible Environments (CAE)  
Blind Veterans UK  
Retina UK  
MS Society  
Greenwich Disabled People Against Cuts  
Leonard Cheshire  
Visionary  
Voluntary Organisations Disability Group (VODG)  
Research Institute for Disabled Consumers  
Muscular Dystrophy UK  
Glaucoma UK  
Suicide Crisis  
Ruils – Independent Living  
Metabolic Support UK  
The Together Trust  
Whizz Kidz  
Royal College of Occupational Therapists  
Visually Impaired Friends  
Fight for Sight / Vision Foundation  
Transport Salaried Staffs' Association  
Sunderland People First  
Spinal Injuries Association  
United Response  
London Forum of Amenity & Civic Societies  
NFB UK

# 1. Comments on the proposals as a whole

## 1.1. Industry-wide pledge

Train operating companies across the country are consulting on similar proposals, underpinned by four industry-wide pledges:

1. There will be a higher proportion of colleagues available across the network than there are today to give face-to-face help to customers out on stations
2. Customers will never have to travel out of their way to buy tickets
3. Those with accessibility needs will always be supported
4. All colleagues will be treated fairly and their new roles will be more varied and engaging

The actual details of these proposals, however, completely contradict all four pledges.

### 1.1.1. Face-to-face help

**Pledge: There will be a higher proportion of colleagues available across the network than there are today to give face-to-face help to customers out on stations**

**Reality: There will be fewer staff across the network, and fewer hours in which to access "face-to-face help".**

Under East Midland Railway's plans, 16 stations will become completely unstaffed, with staff presence limited to "daily" or even "weekly" visits from mobile teams. For West Midland Railways, this rises to 78 stations. They claim that there will be "greater visibility of staff on concourses and platforms", despite there being *nobody at the station* most of the time.

Many other stations will be become unstaffed on particular days, such as Christchurch, operated by South Western, which is set to become unstaffed on Mondays and Sundays:

#### **Christchurch – Category 3**

Transport Focus will be running the consultation for this station

	Current ticket office opening hours	Proposed station staffing hours
Monday	6:00am - 12:55pm	Unstaffed
Tuesday	6:00am - 12:55pm	6:00am - 10:00am
Wednesday	6:00am - 12:55pm	6:00am - 10:00am
Thursday	6:00am - 12:55pm	6:00am - 10:00am
Friday	6:00am - 12:55pm	6:00am - 10:00am
Saturday	7:00am - 2:00pm	9:00am - 1:00pm
Sunday	8:45am - 12:45pm	Unstaffed

Roughly 70 South Western operated stations will see an increase in the number of days where there are no staff located at the station. Like Christchurch, many stations will also have dramatically reduced staff hours on the remaining days.

Train operators pin their claim that “no station that is currently staffed will become unstaffed as a result of these proposals” on the technicality that unstaffed stations will be served by mobile teams on a flexible basis. Mobile teams are not an adequate replacement for station-based staff, and we reject the claim that they will be able to provide the same “face-to-face help”. LNR have said that their mobile teams will be stationed at Customer Information Centres, at selected stations which “have been specifically chosen in locations that were no more than an hour away from each other”. It is ludicrous to suggest that these staff are meaningfully “available” to customers, who will have to wait up to an hour for them to travel over.

Even during hours where stations are staffed, we dispute the claim that staff will be more “available”. The ticket office functions as a designated and identifiable place where passengers can go to find a member of staff. Moving staff into ‘multifunctional roles’ who are roaming around the station will make them harder to find *for the people who need them most*; people with mobility or energy limiting impairments cannot be expected to trek around the station looking for assistance, and visually impaired people may struggle to identify staff. The fact that ticket office staff are in a fixed position “behind the glass” is not a problem that needs to be resolved – it is one of the most helpful and important aspects of their role.

“My local station, Haddenham and Thame Parkway, already reduced the opening hours of the ticket office – it now closes at 1pm on a Saturday. After this, there is theoretically a security person in the station who is meant to get the ramps out. I really struggle to find him, and oftentimes I can’t find him at all. I’m a wheelchair user, and while the station isn’t big, it’s big enough! I have to push myself up the ramp over the footbridge and down onto the platform to check if he’s on one side, and if he isn’t I have to go back over the footbridge and up another steep ramp into the concourse to check if he’s there. It’s exhausting. There have been times where I have given up and tried to use a help point, but it goes through to a call centre in India who are unable to help me. I’ve given up trying to travel at the weekends, it’s a nightmare.”

- *Transport for All member*

We also have very serious concerns that ticket office closures are a precursor to extensive staff cuts across the network. In their Frequently Asked Questions document, EMR refuse to guarantee there will be no compulsory redundancies. C2C write that “staffing hours do not form part of our Schedule 17 commitment and may change in future years.” The only staff that operators are regulatorily obliged to have are the ones stationed in ticket offices. Once ticket offices close, train operating companies (TOCs) are not required to go back out to public consultation before making sweeping changes to staffing levels, and there is nothing binding them to the proposed staffing levels put forward in this consultation. The imperative to cut costs that we believe ultimately motivates these closures will pave the way for mass staff layoffs. Without staff, disabled people will be locked out of the rail network entirely. We cannot overstate the impact this will have.

### 1.1.2. Travelling for tickets

**Pledge: Customers will never have to travel out of their way to buy tickets**

**Reality: Roughly half the TOCs explicitly state that passengers will have to travel to a different station or third party retail outlet in order to access certain ticketing options.**

Online booking and Ticket Vending Machines (TVMs) are not accessible to many disabled people, and several rail products (including the D50 and D34 for wheelchair users and visually impaired passengers) are only available in staffed ticket offices, leaving us with no option but to travel out of our way to purchase a ticket. The following examples show operators explicitly stating this:

**Greater Anglia:** “Customer Information Centres at Chelmsford, and London Liverpool Street stations would sell a full range of products, as well as providing help with more complex transactions.” (<https://www.greateranglia.co.uk/consult>)

**Govia Thameslink (operates both Great Northern and Southern):** “What about tickets that cannot be bought online or on ticket machines? This applies to a very small number of tickets – less than 3% for GTR. The intention is that these will be available to purchase online in the future but in the interim customers would be able to buy them in person from selected larger stations during staffed hours.” (<https://www.greatnorthernrail.com/publicconsultation>)

**LNER:** “As part of the proposal to change ticket retailing at our stations, we plan to close Ticket Offices at Berwick-upon-Tweed, Darlington, Durham, Grantham, Newark Northgate, Retford and Wakefield Westgate. As a result, a small percentage of ticket types will no longer be retailed at these stations. We’ll support customers with purchasing these online, or direct them to a Ticket Office where all tickets will be available.” (Page 5)

**LNR:** “Ticket office facilities will be offered at our customer information centres - large and strategically chosen stations to provide customers travelling from, to, or through those stations with the ability to fulfil certain transactions if they can’t use alternatives or upgraded ticket vending machine (TVM)/ticket sales infrastructure have not yet been delivered.” Tickets will also be available at “third party retailing at a physical location, such as a convenience store, either on- or off-station will be referred to as a ticket stop. These will be targeted at customers paying cash or without access to digital technology to book. Ticket stops will be a long-term solution for customers who cannot or do not want to use bank card payment or digital ticketing.” (<https://www.londonnorthwesternrailway.co.uk/travel-information/at-the-station/proposed-changes-ticket-offices>)

**South Western Railway:** “For customers who travel on the very small number of ticket types not yet available online or via a ticket vending machine, colleagues with full retailing capability and expertise will be available at 24 locations across our network with interim additional facilities.” (Slide 7)

"For ticket types that cannot be purchased at [station], the customer would need to buy the ticket online or at one of South Western Railway's category 1 stations. Ahead of implementation, there will be a way for customers to buy a ticket that allows them to get to a category 1 station to purchase the ticket they require for their journey without being out of pocket. South Western Railway will work with passenger groups to develop the specifics of this proposal. " (Slide 13)

While other operators do not *explicitly* require that passengers go to a different station, they often fail to mention how certain ticket types that are not available on TVMs or online will be purchased at all. In this instance, passengers requiring a ticket like the D50 would have no choice but to either travel to a larger station/hub, risk boarding a train without a ticket, or simply abandon the journey.

For many disabled people, travelling to another station is not an option. Not only does this mean a disabled person spends significantly more time than a non-disabled passenger purchasing tickets, but for those with energy limiting impairments, or those who experience pain while travelling, this extra journey makes this a completely inaccessible alternative. This extra trip will also inevitably incur cost whether that is increased fuel costs or using public transport, and several train operating companies have not acknowledged this or offered any reimbursement or compensation for disabled passengers.

A handful of operators do specify that if a customer is truly unable to purchase a ticket at a given station, they can board without one and make the purchase on board or at their destination. This suggestion assumes the first station is accessible and that a disabled passenger is able to board the train without assistance, which will not always be the case. Even where this is possible, there are additional barriers with this arrangement.

The first barrier is low awareness. Despite this provision already being included in most TOC's Accessible Travel Policies, our research (currently unpublished) found that 70% of respondents did not believe the statement "if you are unable to purchase tickets at a station, disabled people can pay for tickets on the train or at their destination and cannot be charged extra for doing so" to be true (11% said false and 59% said 'don't know'). We know that this will not be a sufficient mitigation, *because the policy has already proven to be insufficient*. Furthermore, no TOC has outlined how they will raise awareness of this option. We have specific concerns for particular impairment groups. For example, many autistic passengers will interpret signs literally and follow instructions, so will be deterred by signage highlighting fines for boarding without a valid ticket.

This will also put disabled people in a position of conflict. If staff find a disabled passenger on board without a ticket, it is likely that they will challenge the passenger, and potentially issue a penalty fare if they do not believe the person was unable to purchase a ticket at their origin station. This is especially likely to affect people with non-visible impairments, who do not "look disabled" to the member of staff. Transport for All's research has found that disabled people already experience these kinds of confrontations:

"We were coming back from Manchester and the wheelchair space in Standard class had been taken. So the person getting the ramp out put me in premier. When the ticket person came along they virtually accused us of fraud for not being in the right

place for my ticket. When I pointed out I was hardly in a position to put myself where I was on my own he went off saying "I'll let you off this time.". His attitude was quite unnecessary."

- *Transport for All member*

Even the prospect of facing these interactions is likely to deter many from boarding a train without a ticket, even when they are explicitly permitted to by the Accessible Travel Policy. Those who experience barriers to communication (including people with a learning disability, anxiety, or who are autistic) are especially likely to be deterred.

These access barriers will again leave many disabled people with no option but to travel to a different station to purchase their ticket or forfeit rail travel completely.

### **1.1.3. Assistance**

**Pledge: Those with accessibility needs will always be supported**

**Reality: These proposals will make it impossible for disabled people to access the support we need to travel by rail.**

Many operators point to places where they have already implemented the changes put forward in their proposals. For example, Southwestern rail have had mobile assistance teams for some time, and GWR have moved to a multi-skilled staff team at their stations in Reading and Newbury. Two existing Greater Anglia stations, Bury St Edmunds and Cambridge North also operate this 'new model of retailing'. EMR state "around 40% of stations already operate without colleagues or ticket offices, with a further 43% being staffed part-time." This is being used as evidence that these reforms are already in place and working successfully.

However, there is no evidence they *do* work. Current levels of accessibility on rail are extremely poor, with the ORR finding that in the past year, a third of booking requests for assistance getting to the wheelchair area were not fulfilled. Our own research (pending publication) found that over 37% of disabled people faced barriers to rail due to low staffing, and 36% experienced issues with booking or receiving assistance in the past year.

Our research also found that 1 in 5 disabled people face barriers when booking or paying for tickets, and the DfT itself notes similar barriers:

"Disabled passengers may experience a range of barriers related to ticketing when travelling by rail, with almost two in five reporting the ticket office not being open as a barrier when buying tickets. Over a third each reported that ticket choices were too complicated and knowing they had the right ticket were barriers experienced when travelling by rail." ("Research on experiences of disabled rail passengers" published July 2019)

The accessibility, staffing levels, and ticketing options are already insufficient. The closure of ticket offices, dispersal and dismissal of staff, and movement towards an almost entirely digital ticketing system will make the situation even worse.

As outlined in point 1.1.1, if there are fewer staff at stations, and fewer hours in which to find them, disabled people will be *unable to access the support we need to travel*. Especially given the high rate of access failures already, Southeastern's statement that there will be "fewer staff, but they will be better able to support our customers following enhanced training" is hard to believe.

The details of each consultation give us no assurance that TOCs will be able to fulfil their Accessible Travel Policies under these new arrangements, especially with regard to Turn Up and Go (TUAG), which requires being able to find staff and receive assistance quickly. Having to call and wait for a mobile team, or traipse around the station looking for assistance, will make this nigh on impossible. We also see WMT's statement that a mobile team will be available to provide assistance "if a booking has been made in advance" as a near explicit admission that TUAG will be unavailable if the closures go ahead.

The increasing reliance on Help Points to request information and assistance will also create barriers for disabled people. A recent audit by the Office of Rail and Road found that only 51% of disabled passengers were able to successfully receive assistance using help points. A system that fails half its users cannot become our only point of access.

Disabled people are also disproportionately represented in the number of people with no access to the internet, making the online means of booking tickets and requesting assistance inaccessible for many; 23% of disabled adults had no access to the internet in 2019 compared to just 6% of non-disabled adults. 42% of people over the age of 75 report not using the internet at all. (London TravelWatch, *Left Behind Londoners*, 2023) The claim that disabled people will "always be supported" when travelling by rail is therefore incompatible with the proposals put forward by all TOCs, most of which heavily rely on digital solutions.

There are also significant access barriers to using Ticket Vending Machines (TVMs). They lack tactile information and functionality, which is essential for blind and visually impaired passengers. Transport for All have heard from blind and visually impaired members that they have been left with no choice but to ask another passenger, a complete stranger, for help using a TVM. This means giving the other passenger their bank card and hoping they do not make an unauthorised purchase, or worse, steal their card. This is an extremely vulnerable position which could so easily be avoided.

Full height TVMs are positioned out of reach for wheelchair users, and the buttons are inaccessible to many with dexterity impairments. They are also very complex to navigate, meaning the correct/cheapest fare is almost always easier to obtain at a ticket office. Very few TOCs have said that they will make all ticket types available on TVMs (e.g. the D50), and none have proposed any solutions to the accessibility issues we have outlined here.

TVMs are also inaccessible for those who do not use bank cards, which includes many disabled people. Several TOCs who have proposed heavy reliance on TVMs have not stated whether all machines will be able to accept cash, as many currently do not.

Ticket offices are generally the only place in the station where an induction loop can be found, yet almost no TOCs have made any mention of how they will continue to provide induction loop facilities once the ticket office closes. If a loop is installed, it requires a member of staff to operate, meaning that passengers entering a station with only roaming or mobile staff will be unable to access the support they need. This is a glaring omission.

Other vital station facilities for disabled passengers that will be impacted by these proposals include access to toilets and heated or sheltered waiting areas. These require staff to unlock them and with the reduction of staffing levels these facilities will have access restricted, despite the claims otherwise. This will mean that those with conditions who rely upon access to a toilet may be unable to travel by rail. Several train operating companies have stated these facilities will be unaffected, which we dispute. With the introduction of mobile staff teams, there is no telling how long a disabled person could be waiting for assistance. Without a protected and heated place to wait, many disabled people will be unable to wait comfortably and their conditions could be impacted by the weather.

Finally, we fundamentally take issue with the claim that disabled people will “always” be able to receive the support we need to travel: the support we need invariably requires staff, and staff hours are being slashed (see breakdown by each operator for more details). This will leave far fewer hours in the day, and far fewer days in the week, in which disabled people can access assistance. We cannot “always” access the support we need *even under present arrangements*. A reduction in staff, in tandem with an increasing dependence on inaccessible alternatives (TVMs, Help Points, digital ticketing, mobile and roaming staff), will lead to a deterioration in these already unacceptable standards.

#### **1.1.4. Treatment of disabled workers**

**Pledge: All colleagues will be treated fairly and their new roles will be more varied and engaging**

**Reality: The new job roles set out for staff are neither fair nor engaging, and are likely to discriminate against disabled staff as well as passengers.**

Ticket office staff are being moved from a static, seated post to a highly physically demanding role. Roaming staff will now have to be on their feet, walking through the station wherever they are needed, and the increased duties of each member of staff means they are likely to be needed in several places at once. Northern's new "Journey Maker" role, for example, will require staff to:

- Help customers to buy tickets online and at TVMs
- Provide assistance to passengers throughout the stations
- Make overhead announcements
- Assist during service disruption
- Clean the station
- Provide information to individual customers
- Resolve additional customer issues

Staff are already overstretched, as has been made clear by the high rate of assistance failures, and ongoing industrial dispute over working conditions. The pledge to make new roles "engaging" appears to be a euphemism for "impossibly demanding".

Moving staff that previously worked at a single station to a mobile team is also likely to disadvantage disabled staff, for whom frequent and unpredictable travel can be a barrier. No operating company has made mention of reasonable adjustments for disabled staff, whose working conditions are about to change dramatically.

### **1.2. Fragmented approach**

These proposals have been devised by individual operators, not at a national level, and have not been standardised across the network. It has led to a piecemeal, fragmented picture, where processes and plans are inconsistent across operators creating ample room for confusion. This is a barrier in and of itself.

Depending on the operator, staff responsible for providing assistance will be called different titles, ("floorwalker", "customer ambassador", "multiskilled role", "journey maker"), making it even harder for disabled passengers to know who they are meant to be approaching for assistance.

The process for requesting assistance will be completely different at different places and times. For Turn Up And Go assistance, at some stations disabled passengers will be required to go to a help point, some have a number for calling a mobile team, and others require passengers to walk around the station to locate a member of staff. If making an

interchange, or switching between lines and operators as part of a journey or when plans change, there may be a completely different way of getting hold of staff, receiving assistance, and purchasing a ticket for the next leg of the journey. How are disabled people expected to become familiar with the different processes followed by each operator?

Pre-booked assistance is impacted by this too. Currently the ticket office functions as a designated meeting point for assistance, whereas the proposals offer no standardised guidance on this: some operators require disabled passengers to go to a specific boarding point on the platform where a train guard will provide assistance onto the train, while other operators have not made clear where the meeting point is. By requiring disabled passengers to find this meeting point, it is unclear how TOCs believe this meets their obligations under the Accessible Transport Policy, particularly providing sighted guidance to the platform.

Some TVMs accept cash, while some don't. Some have video call functionality, while others don't, even on the same network. Some operators state that, if you cannot purchase a ticket at a given station, they will organise for you to be transported (presumably by taxi) to the nearest station with staff/full range of ticketing options, while others say that disabled passengers should make their own way there and will not be reimbursed.

What is particularly frustrating is that the Government is well aware of the issues that fragmentation creates. The Williams-Shapps Plan for Rail made many direct references to it ("the sector today is too complicated, too confusing for passengers"). The Plan outright stated that "the rail network should feel like a network, a coherent, consistent, clearly-branded operation that gives passengers confidence in using it", and we fail to see how juggling interactions with both "floorwalkers" and "journey makers" achieves this.

Barriers to information are already high. A further finding from our currently unpublished research was that only 37% of respondents said they felt well informed while on their train journey. 38% said poor information about the accessibility of stations had been a barrier to rail travel in the past year. Should these proposals go through, the fragmentation will make it prohibitively confusing to travel, arrange and receive assistance, and purchase tickets.

## 2. Process

Train operating companies are required, under the Ticketing and Settlement Agreement (TSA) to complete a Major Change Template which asks if operators will still be able to provide pre-booked Passenger Assistance within the 2 hour timeframe, and if not, then what the 'alternative arrangements' will be. We find the suggestion that there are *any* appropriate alternatives to providing timely assistance unacceptable, and fundamentally flawed. We also note the glaring omission Turn Up And Go in this template. We have spoken out about these plans for over a year and have made it abundantly clear that ticket office staff are essential and cannot be replaced.

### 2.1 Lack of engagement

Given the size and scale of the ticket office closures, with such profound impacts on disabled people, it is staggering that disabled people and the organisations that represent us have not had the opportunity to meaningfully influence this policy at a National level.

The Department for Transport consulted with the Disabled Persons Transport Advisory Committee (DPTAC) before amending the Ticketing and Settlement Agreement (TSA) Ticket Office Guidance, at around the start of 2022. However, this was a closed – not public – consultation. It is unclear what concerns DPTAC raised regarding these changes or how those concerns have been addressed, as a report on the consultation has not been published. Our organisations were not able to provide comments or feed into this consultation.

When the proposed closure plans were first leaked to the press in Spring 2022 we began loudly voicing our opposition. In August 2022 we wrote directly to the then Secretary of State for Transport, Grant Shapps, to set out our concerns about the proposals. The letter was co-signed by 15 organisations representing Deaf and disabled people, and addressed the impacts ticket office closures would have on our community's ability to access rail services. The Minister's response failed to address many of our central points, arguing that shutting ticket offices would actually improve accessibility.

Since then we have sought out meetings with decision-makers across the rail industry, including the Rail Delivery Group, Office of Rail and Road, and the Department for Transport. At every stage we have thoroughly and vociferously opposed the plans, and made clear the disastrous impact they will have on disabled people. Upon seeing the content of the proposals that have gone out to public consultation, it is clear our concerns have gone unheard.

Equality and Impact Assessments have been carried out by train operators (it is claimed), however as the vast majority of TOCs have not published these alongside the consultation materials it is impossible to scrutinise what considerations operators have given to the impact on disabled people.

While the Rail Minister is adamant that these proposals will bring benefits to accessibility and disabled passengers, we fail to see how he has formed this opinion. Government must act

upon the input of experts in this area, and respond swiftly to the scale of expert organisations who have spoken strongly against the proposals.

## 2.2. Inaccessible consultation

Instead of proactive, early, meaningful engagement with disabled people and organisations, plans for individual closures are going out to public consultation, with consultations only open for a mere 21 days. Each train operator has put forward a different proposal, the details of which vary significantly (as outlined in the previous section). With 16 train operators putting forward proposals, and many of them operating both within and outside of London, there are effectively a total of 23 consultations open, with different consultation documents and different email addresses to send objection letters to for each. The sheer volume of information contained within the collective proposals, together with the administrative burden of trawling through different websites to find details of particular stations and sending off multiple emails to different addresses is time-consuming and laborious, and a particular barrier for the very people who will be impacted the most.

While passengers are being encouraged to submit their views on proposals at their local station, or other stations that they use regularly, we believe this is a completely inadequate model for gauging impact on disabled people. For many, the proposals would mean stations becoming totally inaccessible. Disabled people therefore may wish to object to all of the proposals, on principle. We want to be able to travel from our local station, but also from any other station that we might visit at any point in the future. This fragmented approach will also fail to capture the cumulative impact of the changes.

Train operators are also not required to widely promote the consultations, aside from putting a poster up in a station. We've seen many examples of tiny posters in stations with limited information at stations across England.

Online, the consultation pages are often difficult to find on the train operator's website, and key details (such as which stations will become unstaffed) are hidden among confusing and misleading statements. The proposals are referred to in ambiguous, uncontentious terms such as "modernisation plans". In SWR's proposals they repeatedly state:

- "We will ensure that all currently staffed stations will remain staffed." (p5)
- "Those with accessibility needs will always be supported." (p5)
- "...by bringing [staff] out of the ticket offices and into the stations, they will provide more visible and personal help to our customers." (p6)
- "Category 3 stations will have one colleague available to support retail choices and other customer needs" (p10)

It is later revealed that there will in fact be "one colleague available at set times". They go on to list each station individually, with the current ticket office hours compared with the proposed staffing hours. We were able to decipher that 68 stations will have an increase in the number of days where the station is completely unstaffed, which contradicts the pledges stated above. This is not immediately apparent or easy to understand. This was our overarching experience of the consultation, and will mean a great number of disabled people will not understand the full extent of the plans or how they will be impacted.

Finally, we are shocked at the lack of accessibility of the consultations themselves. Many train operators have not provided the proposals in accessible alternative formats, such as British Sign Language (BSL), EasyRead, Braille, Large Print, and others. Where these formats do exist, they are difficult to get hold of, and not all formats are available (one example we experienced involved an operator offering braille in lieu of BSL). Any consultation, but especially one on proposals directly impacting disabled people, is rendered useless if it does not adequately capture the views of the impacted community.

### **2.3 Fairness of consultation**

We believe that the consultations do not meet the Gunning principles for fair consultation. We suggest that a consultation which does not meet these principles should be called into question.

#### 1) Proposals are still at a formative stage

The language used by many of the TOCs suggest that, regardless of the outcome of the consultations, they will proceed with the proposed changes. This is a cost cutting exercise to make up for the loss of income during the pandemic. Many TOCs refer to stations under their remit where the suggested changes are already in effect and mention the perceived lack of detrimental impact this has had on passengers. We know from countless disabled people that at stations with no ticket office, they regularly experience assistance failures or avoid these stations at all costs.

#### 2) There is sufficient information to give 'intelligent consideration'

Sufficient information has not been provided in accessible formats. Some TOCs have made these formats available later, in part due to Transport for All contacting each TOC requesting these. Some, however, have responded that these are unavailable or will take a significant amount of time to reach the disabled person. In some instances this amount of time exceeds 21 days this consultation is open for. For many disabled people, it is impossible to give the proposals and intelligence consideration due to the lack of alternate formats available and the lack of equality impact assessments.

Only one of the 16 TOCs has published an EqIA for these proposals. Many have mentioned an assessment has been done and submitted to the Department for Transport or have said the responses to the consultation will inform their EqIA. It is impossible for a disabled person to give "intelligent consideration" to these proposals without understanding the impact they will have and what mitigations are in place (and when). While the TSA does not require an EqIA to be made, many disabled organisations were assured that these assessments were being done. If that is the case they must be published and made available for the duration of the consultation in order to comply with the Gunning Principles.

#### 3) There is adequate time for consideration and response

While the Ticket and Settlement Agreement only requires these consultations to be open for 21 days, we believe this is wholly insufficient. With 16 TOCs having open consultations at the same time, 21 days is an extremely short amount of time to respond to each one in full. It

is also crucial to point out that the very few TOCs have made alternate formats available from the outset of the consultation, meaning that many disabled people have been unable to make full use of the 21 days.

- 4) 'Conscientious consideration' must be given to the consultation responses before a decision is made.

The passenger bodies, London TravelWatch and Transport Focus, have a very short amount of time to read the letters of objection and come to a decision on the proposals, up to 28 days. Given that 16 TOCs opened their consultations on the same day, passenger bodies will be inundated with responses. This gives them very little time to consider the catastrophic impact these proposals will have on disabled people at each station and reach an appropriate decision.

If the passenger body rejects the proposal, the decisions can then be overturned by the Secretary of State for Transport. There is no detailed information or quantifiable metrics published to explain how the Secretary of State will make the final decision. Based on this, it is impossible for there to be "conscientious consideration" to be given to this consultation.

### 3. Detailed objections by train operator

#### 3.1 Avanti West Coast

Whilst Avanti proposes that ticket office staff will be replaced with "Customer Ambassador roles", these roles will seemingly not be available from first to last train. Under the detailed proposals for each station, Avanti lists times for "ticketing support available", and these hours are significantly less than operating hours. For example, under proposed change to **Birmingham International**, ticketing support will be available on Sundays until 7pm, while the last train on a Sunday is 01.13 (currently the ticket office is open until 9pm). This constitutes a more than seven hour gap where there will be no ticketing support available. It is therefore unclear how disabled people requiring ticketing support will get that support in these hours.

While Avanti suggests that these roles will mean there is a "visible and accessible staff presence" during staffed hours, there is no detail on how this will be achieved. For example, there is no detail on where precisely staff will be located ("on ticket concourses and on platforms" suggests they will be roaming). If there is no designated point, how will disabled people find them? How will blind and visually impaired people locate and identify them as staff if they are roaming around the station? How will people with mobility and energy-limiting impairments find help if they are required to wander around the station in search of assistance? If staff are on platforms, how will people who require assistance purchasing tickets get through the ticket barrier? How will Deaf and Hard of Hearing people communicate with these staff if they are not in a ticket office with a hearing loop? Will these staff be able to take cash payments?

Finally, Avanti states that people will have access to the same products. Some rail products are only available at a ticket office (for example, the D50 for wheelchair users and blind/visually impaired passengers). Avanti has not made clear how these products will be available to purchase.

## 3.2 Chiltern Railway

The movement towards "multi skilled customer help roles" who move through the station will make staff less visible, and harder for passengers to request assistance. There is no detail as to how passengers who need assistance from the entrance will get hold of staff at all. While Chiltern has argued that this model is already in place in **Bicester Village and Oxford Parkway**, there is no detail on how the success of this has been evaluated - how has Chiltern ensured disabled people have not already been negatively impacted by these changes?

The proposals also contain contradictory information, claiming that "customer accessibility services will remain unchanged", but also that "hours of service for accessibility and ticket assistance" will be "similar", not the same. There is no mention of what training staff will have in these new roles to ensure disabled people receive an equitable service.

We know 23% of disabled adults are non-internet users (London TravelWatch, Left Behind Londoners), making the proposal to purchase tickets online or via a mobile app inaccessible to so many individuals. Chiltern are suggesting the alternative will be to use a ticket vending machine (TVM) with the assistance of staff. However we know that currently TVMs do not offer all rail products, in particular the D34 and D50 for wheelchair users and blind passengers. Though some roaming staff members will have 'enhanced mobile devices' to sell these tickets, it is implied that not all staff will have these, and there is no clarification as to whether they will accept cash. It is also unclear how disabled people will be able to get to these roaming staff if they are on the platform and a person requires a ticket to get through the barrier.

The expansion of Pay As You Go (PAYG) ticketing is also not an acceptable mitigation. It is particularly inaccessible for those with dexterity, cognitive, or visual impairments, and those with learning disabilities. There is no detail as to how these barriers to use will be addressed. The penalty fares for incorrect use of PAYG ticketing are also high, meaning disabled people are disproportionately likely to be overcharged.

## 3.3 C2C

C2c's proposals put a large emphasis on a new type of staff role called "floorwalkers" which c2c say will have the same training and knowledge as ticket office and will "be on hand" to assist passengers. Additionally, c2c state that compared with today, "staff would be more visible" and "have more time to assist customers who need the most help". Upon reading the proposals, we do not see how that can possibly be true.

Firstly, the vast majority of stations will only have floorwalkers until 8pm. Only two stations, **Fenchurch Street and Shoeburyness**, will have floorwalkers beyond 8pm, and even then it won't be from first till last train (no floorwalkers after 10pm). Two stations, **Chafford Hundred and Thorpe Bay**, will only have floorwalkers until 1pm. Three stations, **East Tilbury, Limehouse and Ockendon**, won't have any floorwalkers at all, and will only have gateline/security staff at the station. And three stations, **Dagenham Dock, Rainham and**

**West Horndon**, will have no staff at all, not even gateline or security. We fail to see how staff will be “on hand” and “more visible” if they are not at the station. This appears to directly contradict the Government and industry line that “no stations will become unstaffed as a result of these proposals”.

In their Major Changes Template for London Travel Watch, C2C note that Ockenham station is nearby “Beacon Hill Academy, a school for people with profound disabilities [...] and is a potential source of short notice and regular assistance. This combination creates a short notice need for staff throughout the day and night.” However, upon checking the proposed staffing hours, the Ockenham ticket office will close AND there will be no Floor Walkers either. These are the only staff who are fully qualified in assisting disabled people to buy tickets. Incidentally, the hours in which other staff (not Floor Walkers) will be available at Ockendon has been omitted from C2Cs other documents, despite this information being available for other locations. Despite identifying this station as needing higher levels of staff support, C2C have failed to provide this support on ticketing, and have failed to guarantee anywhere in their proposals the availability of other assistance staff. Similar breakdowns by station are not available for C2C stations outside of London.

Disabled people who want to travel from these stations and require assistance are “strongly encouraged to book in advance”, and should we wish to travel spontaneously we must rely upon ‘help points’ to contact a mobile team who will be dispatched from a neighbouring station (which c2c point out may not arrive in time for the next train). This is totally unacceptable and completely removes the ability to Turn Up And Go. Help points have around a 50% fail rate according to the ORR’s mystery shopping data. Even if we are able to get through, a mobile team may already be occupied delivering assistance elsewhere at a station miles away, or may get stuck in traffic. It is inconceivable that disabled passengers should be expected to wait hours for assistance to show up. This also leaves another question unanswered: what about people who are unable to use help points? Blind and visually impaired people may need sight-guiding through the station and may not be able to safely locate a help point independently. Help points will not be accessible to some Deaf passengers.

For stations that do have floorwalkers, we do not agree that having a roaming member of staff who could be anywhere in the station is “more visible” than a staff at a designated and known place. A ticket office is accessible, fitted with a hearing loop, and crucially doesn’t move.

It is interesting that c2c state that “35.8% of c2c customers bought their ticket from ticket offices over the 12 months to June 2023”. This is a huge proportion of sales. Some rail products, including the D34 and D50 for wheelchair users and blind passengers, are only available from a ticket office. In the table labelled “Where you will be able to purchase c2c products” there is no mention of these discounts. We presume these will not be available to purchase online, so it is unclear how passengers will be able to purchase these products.

### 3.4 East Midlands Rail

EMR proposes closing ticket offices at 29 stations. Out of these, 16 will become totally unstaffed. Six stations, including **Burton-On-Trent and Newark Castle**, are expected to have “daily visits” from mobile staff. Ten stations, including **Skegness and Oakham**, are only expected to have “weekly visits” from mobile staff. This is shocking and unacceptable, and contradicts Government’s line that “no station will become unstaffed as a result of these proposals”. We fail to see how an unscheduled “weekly visit” from a mobile team constitutes being staffed.

EMR’s proposal contains no detail on how they will continue to meet their commitments from the accessible travel policy. The extent of information provided is “we remain committed to support all our customers accessibility requirements. All train services that call at EMR managed stations will continue to have a guard on board who are able to support with any Passenger Assistance requests”. There is no detail on how disabled people who require assistance through the station (for example, blind passengers who need sight-guiding, or people with cognitive impairments or learning disabilities who need support) will get this. Disabled people using this company have no way to appropriately respond to this consultation because they do not know what the alternate arrangements will be when the ticket offices are closed.

The mention of staff being available “at the right time in the right locations” is absurd and ambiguous. Customer demand can change at any point, and there is no way of predicting when a disabled person may want to use the network. Disabled people using this company will have no idea if a staff member will be available.

We know that customer help points are very unreliable when trying to arrange assistance. Recent research from the ORR shows that only 51% of disabled passengers were able to successfully receive assistance using help points. Even if we are able to get through, a mobile team may already be occupied delivering assistance elsewhere at a station some miles away, or may get stuck in traffic. It is inconceivable that disabled passengers should be expected to wait hours for assistance to show up.

Contact centres are also an unreliable method of arranging assistance. By requiring disabled people to arrange assistance this way, it places a significant time burden on the disabled person to plan their journey, precisely and in advance. This burden is not shared by non-disabled passengers.

There is no detail on how the process of purchasing and renewing Disabled Railcards will be set out, or how disabled people will be able to purchase the D34 and D50 products.

### 3.5 Govia Thameslink (operates both Great Northern and Southern)

GTR only guarantees staff will still be available from first to last train “at stations with step-free access”. This presumes that staff assistance is only needed by wheelchair users, which is not the case! For stations including **Ashwell & Morden, Bowes Park, Brookmans Park**, and many others, there will now be no staff assistance available at the weekend, meaning disabled people who can use non-step-free stations (like blind people) will not have the assistance they need.

For example, **Warblington** is a non-step-free station, which currently is staffed Mondays-Fridays 07:55 - 09:15. The proposal is there would be no ticketing assistance, at any time. For blind and visually impaired people who do not require step free access but may need support purchasing their tickets as TVMs are inaccessible, there will now be no staff around to provide this assistance.

In cases where staff will not be in the station at all, there will be “mobile assistance teams” who can be contacted via telephone or Help Point. Help Points have a failure rate of around 50% for disabled people requesting assistance (according to mystery shop data from the ORR), and there seem to be no plans to address this or improve the technology. The only alternative is phone, which does nothing to accommodate the digitally excluded, or Deaf/hard of hearing people. It is unclear where the Help Points will be located, but if they are located on the platform beyond the ticket barrier, this is inaccessible to blind and visually impaired people who need sight-guiding through the station in order to travel safely. Even if a passenger requiring assistance is able to request assistance via the help point, we have serious concerns about the time it will take for the mobile assistance teams to reach them - especially during rush hour when traffic will be bad.

The plans also state 3% of tickets will not be available for purchase online or at TVMs before ticket offices close. This includes the D34 and D50, and disabled people who require any of these tickets will have to travel out of their way to a larger station (during staffed hours) to buy them. This could lead to situations whereby a passenger in, for example, **West Worthing** is required to travel to **Brighton** just to purchase a ticket. This would be almost an hours drive (1 hour 15 on the bus) before setting foot on a train, completely contradicting the industry-wide pledge that “customers will never have to travel out of their way to buy tickets”. Expecting disabled people to make an additional journey, with the stress and time that involves, before they can even get on the train is bad enough in itself. But to add insult to injury, Southern does not offer to reimburse the cost of this journey as some other operators have done.

GTR do not guarantee that the availability of station facilities (e.g. toilets) will remain the same, saying this is “under review depending on the outcome of the consultation”, which is not remotely reassuring. There is no detail about hearing induction loops.

### 3.6 Greater Anglia

There was a distinct lack of information included in the published materials, making it difficult to assess the proposals.

Greater Anglia states that "no station would become unstaffed as a result of these proposals", which we believe is a misleading statement. There are over 15 stations which will see a dramatic reduction in staffing levels. For example, **Braintree, Lowestoft, Great Yarmouth** and several others stations will become unstaffed on Sundays (where they are currently staffed), with GA stating there will be "Regular visits by our mobile team" but no detail on how regular these visits will be, or how long it will take for mobile teams to be dispatched when requested in a Turn Up And Go scenario. **Rochford** station will become unstaffed on weekends. We also note the lack of regulatory framework to ensure this happens as stated.

This proposal does not explain how disabled customers will be able to find and identify the new "customer host" at stations. It is unclear from their proposals where Greater Anglia are suggesting to move staff to that they feel is "better placed" than a ticket office, but is still accessible to everyone and fitted with a hearing loop.

It is very unclear from the proposals whether passengers will be expected to contact the contact centre directly or via a ticket machine. If it is through the ticket machine, we know that these are very inaccessible to many disabled people making this not viable.

By turning the "seven major stations" into "Customer Information Centres", disabled passengers that are unable to purchase tickets or arrange assistance at their preferred station will be required to travel to one of the seven stations. For example, passengers travelling from **Great Yarmouth** (set to become completely unstaffed on Sundays) who require support purchasing their tickets are being asked to travel to **Norwich**, which is 1 hour 10 minutes away. There is no detail on whether Greater Anglia will compensate passengers who need to do this for their time, or any expense they incur. This also directly contradicts the industry-wide pledge that "customers will never be expected to travel out of their way to purchase tickets".

### 3.7 Great Western Rail

Though Great Western say that Passenger Assist would not be affected by these plans, we fail to see how this could be the case. Many stations will see a reduction in hours where it is staffed. For example, **Bristol Temple Meads** is currently staffed at the ticket office until 9.30pm on weekdays, but under the proposals the station will only be staffed until 7.30pm. Both **Reading** and **London Paddington** are currently staffed until 10pm on weekdays, this will decrease to 7.30pm - particularly shocking for such large and important stations. London Paddington is the 6th busiest station in the UK with 23.8 million journeys made per year. It is one of the key interchange terminals, connecting with South Wales mainline as well as Elizabeth Line and London Underground services. Becoming unstaffed after 7.30pm on weekdays will mean any disabled passenger commuting out of London after work will struggle to get assistance - either having to book it in advance (a burden that is not expected of non-disabled passengers, and not always possible given meetings overrun), or contact assistance via the help point and wait for staff to arrive. At all of these stations that will see an increase in unstaffed hours, it is unclear how Turn Up And Go will work in these new unstaffed hours, and how customers will access facilities such as toilets, waiting rooms, and lifts.

There is a heavy reliance on digital alternatives for receiving assistance (booking online, Passenger Assist App) and ticketing (online, contactless payments, TVMs). And yet no steps are being taken to remove the digital barriers that prevent many disabled people from using these. Interestingly, GWR is one of the few train operators that makes reference to availability of railcards, however the information they have given is incorrect. They state that "the Disabled Person's Railcard... [is] available online, with some also available to buy via post or phone." While it is true that the Disabled Person's Railcard can be applied for via post, the application form one must complete to do this can only currently be collected from a \*staffed ticket office\* or downloaded from a website. For those with no online access, there is no detail on where this form will be collected from in the future.

Some discounts, including the D34 and D50, will no longer be available for purchase at stations or online, but only on-board trains. This will put disabled passengers into potentially stressful situations where they could be challenged by the guard for boarding without a ticket and potentially fined.

For those that require human support in purchasing a ticket, for example those with cognitive impairments or learning disabilities, GWR says "there will be more staff with more training on platforms and station concourses, helping passengers to plan journeys and use digital and self-service ticketing" but it is unclear how passengers will access these staff if they are on the platform (which requires having a ticket to get to). This also contradicts what we know from the proposals which is that many stations will in fact see a decrease in staffed hours.

There is also some contradictory information about access to station facilities. Great Western have said that "Customer access to station facilities such as waiting rooms and toilets is unaffected by these changes". However, the hours where staff are available has been reduced at a number of stations. This is almost certain to affect the availability of facilities, as staff are required to unlock them.

### 3.8 LNER

At the stations where ticket offices are set to close, 8% of ticket types will no longer be available for purchase. Disappointingly, in the table showing where customers can buy products there is no mention of the D50 for wheelchair users and visually impaired passengers. We presume these products will not be available to purchase online or from a TVM (as they currently are not). Therefore anyone who requires these tickets will likely have to travel to a different station to buy their ticket, expending additional time, energy, and money. For example, passengers travelling from **Durham** won't be able to purchase the D50 at the station or online, and so will have to travel to **Newcastle** first to purchase this ticket - over an hour away on a bus.

If travelling Southbound this would be an hour in the wrong direction before you've even started your journey. It is unfathomable that disabled people could be expected to do this, and directly contradicts the industry-wide pledge that "customers will never have to travel out of their way to buy tickets". If a passenger needs a refund, and there is no Customer Information Centre at their station, they will have to go online or call the operator, instead of being able to simply walk up to a ticket office and ask. This could lead to disabled passengers not getting the refunds they need and being out of pocket, at a time where we are facing an average £975 additional monthly costs. The lack of detail around the refund process is worrying, and their website says they are "working through this in more detail".

Having roaming staff around the station makes it significantly more difficult to find and request assistance, especially for those with mobility and energy limiting impairments. Passengers are told to "look out for us in red" if they need to identify a member of staff, which is not accessible for blind/visually impaired people needing assistance.

There is very limited detail as to how their Accessible Travel Policy will continue to be met, and there is no mention of the availability of station facilities or induction loops.

### 3.9 WMT (comprising of London Northwestern Railway and West Midlands Railway)

Both LNR and WMR are operated by West Midlands Trains, and we shall provide our analysis for both of them together.

WMT's proposals are extensive and shocking. From our analysis, it appears that a total of 78 stations will lose their designated staff team and become totally unstaffed, being instead served by roving "mobile teams" "on a flexible basis". These include important stations such as **Great Malvern, Hemel Hempstead, Redditch, and Stratford-upon-Avon**. We totally dispute the idea that this constitutes being a staffed station, and would argue that the Government's line that "no currently staffed station will become unstaffed as a result of these proposals" is false. WMT's statement "moving staff out from behind windows and onto concourses and platforms will enable them to provide support and assistance to passengers in a way that they currently cannot" is extremely misleading, as the reality for most stations, at least part of the time, will be zero staff presence.

Having to call a mobile team and wait for them to make their way over will inevitably increase the time it takes to receive assistance. Worse still, WMT state that the customer centres "have been specifically chosen in locations that were no more than an hour away from each other" to allow mobile teams to provide assistance "if a booking has been made in advance." We believe this constitutes an admission that Turn Up and Go assistance, as it currently exists, will no longer be available should the closures go ahead. This means disabled people who cannot book in advance, for example in instances where you don't know what time your engagement ends, arriving at a station needing assistance will have to wait up to an hour for this to arrive. We absolutely believe that this is an insurmountable barrier and will prevent disabled people from travelling. Additionally, there is no requirement for passengers to book in advance, and this must not change.

Passengers needing to buy tickets in person for whatever reason will now be directed either to a Customer Information Centre (which are up to an hour apart) or go to a third party retail outlet which will sell tickets. The pitfall with both of these is that disabled passengers will have to make an additional journey before they even get on their train, and incur additional travel costs. There is also no mention of what training (if any) staff will receive at these third party retail outlets to ensure that they can provide an adequate service to disabled passengers, and nothing has been put in place to ensure the retail outlets themselves are accessible.

WMT have said they will install new Help Points, but have not specified how these will be made more accessible than the current versions, which are inadequate. There is also no detail on the timeframe for this, and we are very cognisant of the lack of regulatory framework to ensure this happens. TVMs will only be upgraded to sell the "most popular tickets". If TVMs are going to be relied on so heavily, they need to sell ALL tickets. Disabled persons discounts (e.g. D34 and D50) may not be the most popular - does that mean we won't be able to buy them unless we travel an hour to the nearest Customer Information Centre? TVMs are also inaccessible for a number of other reasons, none of which have been addressed.

### 3.10 Southeastern

Southeastern is relying on larger stations or 'Travel Centres' to provide services no longer available at small/medium stations. In their Equality Impact Assessment (EQIA), they acknowledge that not all rail products are available online or via TVMs, and pose that disabled passengers should travel over 30 minutes out of their way to these Travel Centres to access "full retail facilities". For example, passengers travelling from **Hayes** will first have to travel 35 minutes on the train (longer by bus) to London Bridge to purchase the correct ticket. This is not an acceptable mitigation, and a direct contradiction of the industry-wide pledge that "customers will never have to travel out of their way to buy tickets", and there is no mention of how passengers will be reimbursed for this extra journey. A number of ticket and retail options will now only be available online as well.

Southeastern's suggestion that "fewer staff" will somehow be "better able to support our customers following enhanced training" is perplexing. Staff are already overstretched, and assistance failure rates are much too high as it is. Having fewer staff will worsen this.

The EQIA acknowledges some customers require induction loops, which are often only present in ticket offices. It addresses this by suggesting staff will enable them to "seek out a quiet area", which is not remotely an appropriate alternative to an induction loop.

Their EQIA acknowledges that Ticket Vending Machines are not accessible to some, but addresses this point by saying they plan to install 100 additional touchscreen ticketing machines - which will not help at all as these are inaccessible to blind people. Saying that they are as "easy to use" as the screens in "fast food restaurants" is obviously not helpful for those who can't use these either.

Ticket offices also serve a crucial function as a meeting point. Under new plans, disabled people would have to look online to find the designated meeting place while waiting for a Mobile Team. This fails the 23% of disabled adults who do not have access to the internet.

As staff are now roaming throughout the station instead of being in a designated point, disabled people will have to either contact them through an assistance point or their smart phone. Again, digitally excluded people will be left with no choice but to go through the station, walk around looking for a member of staff, then walk back with them to the TVM where they can assist, by which point they may very well have missed their train. This is especially inaccessible for those with mobility, visual, or energy limiting impairments. A key point that Southeastern also fails to address: how are you supposed to go through the station and find a member of staff if you cannot get a ticket to go through the gate?

Southeastern also do not guarantee that station facilities will continue to be available to the same extent they are now. Rather, they say they are "working with Accessibility experts and our Accessible Travel Advisory Panel to draw on ideas and initiatives that have been developed across the industry to ensure that facilities such as accessible toilets and waiting rooms remain open as much as possible". This is hardly reassuring, and is far from a guarantee that station facilities will be available at the same times they are now. This will be a particularly disabling barrier to any passenger with a medical condition or impairment that means they need access to facilities such as toilets at short notice.

### 3.11 South Western

While South Western state that “all currently staffed stations will continue to have colleagues available to help customers”, this is a misleading statement. Many stations will in fact become unstaffed on particular days, often Fridays, Saturdays, and Sundays or Mondays. Upon closer analysis of the proposals, we found that 69 stations will see an increase in the number of days the station is totally unstaffed (e.g. **Addlestone, Barnes, Farncombe**). Additionally, many stations will see a dramatic decrease of staffing levels. For example, **Christchurch station** is currently staffed at the ticket office 6 days a week from 6am to 12.55pm, and on Saturday until the mid afternoon. Under proposed staffing hours, the station will be totally unstaffed on monday and sunday, and all other days will only be staffed 6am - 10am (9am - 1pm on Saturday).

These stations fall under what SWR call Category 3 stations, where there will be "one colleague available to support retail choices and other customer needs" (p10), however later on in the document it specifies that there will actually be "one colleague available at set times". During unstaffed hours, SWR state that "For ticket types that cannot be purchased at [the station], the customer would need to buy the ticket online or at one of South Western Railway's category 1 stations." This directly contradicts the industry-wide pledge that "customers will never have to travel out of their way to buy tickets". These proposals also directly contradict another industry-wide pledge, that "those with accessibility needs will always be supported". It is unclear how passengers will be expected to find staff, who are now being dispersed around the station in multifunctional roles rather than at a designated point. Those who need assistance boarding the train are told to go to an “assisted boarding point”, but no mention is made of how passengers who need assistance immediately upon arriving at the station entrance (e.g. those who require sight-guiding through the station) will be able to alert the staff to get this. There is also no mention of where there will be induction loops.

The proposals also outline a move towards digital ticketing solutions, by “investing in enhancements” and “develop[ing] and market[ing] products to drive an increase in digital uptake.” This does not address the fundamental reason that many disabled people do not use digital alternatives; it is not that we are simply reluctant, it is that they are inaccessible. Implementing video call technology on some TVMs will not remove the key barriers to their use (inaccessible to blind/visually impaired people, those with dexterity impairments, often out of reach of wheelchair users, frequently out of service).

These changes are justified by saying that 99% of tickets could be bought online or using a ticket vending machine. It is not however specified which tickets are *not* currently available online, or if/when they will be made available. Those passengers that still require a member of staff to purchase these tickets in the interim will have to travel to a category 1 station to find “colleagues with full retailing capacity and expertise”. While South Western say “there will be a way for customers to buy a ticket that allows them to get to a category 1 station to purchase the ticket they require for their journey without being out of pocket”, there are no details of how this will happen. This also fails to account for the disproportionate stress, time, and energy needed for disabled people to make this additional journey.

There is also no mention of whether TVMs will all be able to accept cash.

### 3.12 Northern

Northern proposes closing ticket offices at 131 stations, and significantly reducing the number of hours that staff are available at stations. Northern state that "during advertised staffing hours of stations our teams will be available to assist you like today", which brings no reassurance to any disabled person who wishes to travel outside of these heavily restricted times. We see this as a severe and unacceptable curtailing of disabled people's freedoms and rights to access this public service.

**Manchester Victoria**, one of the busiest stations in the region, will only be staffed until 6pm on weekdays and 5pm on Sundays. The vast majority of stations (121 in total, including important stations like **Deansgate and Salford Central**) will now be completely unstaffed on Sunday. Some stations, including **Burnley Central, Hag Fold, Hale, Parbold, Rose Hill, and Woodsmoor** we be virtually unstaffed apart from a few hours on weekday mornings. **Leeds Travel Centre** will have no staff at all, ever. We believe the statement "All 149 stations where we have ticket offices currently will continue to have a colleague presence" is therefore misleading at best, as most stations will have a significantly reduced staff presence. It is unclear what disabled passengers who require assistance are expected to do outside these hours, as there is no attempt to offer anything in its place - not even visits from mobile teams.

The fact that Northern state that they "are working on the detail of how the changes we are making will further support accessible travel in the future" is shocking and unacceptable: how are disabled people expected to comment upon proposals that are still not finalised. The proposals also hint at the loss of Turn Up and Go as Northern "recommends that you continue to book assistance at least two hours before travel if it is needed."

The movement towards a single "Journey Maker" role for staff, which requires a single colleague to sell tickets, provide assistance, resolve customer issues, help during disruptions, advice on journey planning, and make announcements, is unfeasible. Staff will need to be in five different places at once, and it is extremely unlikely that they will be "available to assist you like today" as proposed.

The new ticketing proposals are also extremely confusing. Those who cannot pay by card will be required to buy a 'Promise to Pay' notice from a TVM and present this to a guard on board the train. This excludes those for whom TVMs are inaccessible (for example, those with dexterity issues and blind people), and puts them in a situation of conflict where they are at risk of receiving a penalty fare through no fault of their own. It is also unclear how people will access disabled persons discounts such as the D34 and D50. The proposals say that these will be available for purchase on board trains and online, but does this require a Promise to Pay notice as well? If not, why is this necessary for cash purchases? And if so, what is being done to make this accessible?

Third party retail outlets are also being proposed as ticketing venues. But again, there is no mention of what training these staff will receive, or how it will be ensured that the outlets themselves are accessible.

### 3.13 TransPennine

TransPennine say that there will be “a more visible staff presence to customers during the times they are on duty”. But the “times they are on duty” are reducing at most (9) of the stations where ticket offices are set to close. For example, it is proposed that **Brough and Grimsby Town** be staffed only until 3pm on weekdays. **Malton, Northallerton and Scunthorpe** will only be staffed until 2pm on weekdays. **Stalybridge** will be staffed only until 1pm on weekdays. Even if it were true that multifunctional roaming staff provided a “more visible presence” (which we dispute), the overall availability of staff is going down.

It is unclear how disabled passengers, particularly those commuting to and from work, are expected to use these stations outside of these severely restricted times. The alternatives proposed by TransPennine are inadequate. For example, TransPennine state that “at times when our stations are unstaffed, there are a range of facilities available to assist customers” and point to “help points” (which we know to have around a 50% fail rate), as well as “My Station View 3D tours and GoodMaps turn-by-turn directions”, which are an insufficient replacement for staff-assistance with things like sight-guiding and deployment of manual boarding ramps.

TransPennine go on to say that “if a customer specifically needs station staff assistance to access rail services, by providing help through the station, then outside station staffing times, alternative transport to the nearest accessible station or to their destination will be provided”. We understand from members that this rarely works well in practice: taxis often take hours to turn up and when they do are often inaccessible (we have reservations about the availability of Wheelchair Accessible Taxis in this region at short notice). We also fundamentally believe this is no fair substitute for allowing disabled people to use the rail network, as non-disabled people do. TransPennine acknowledges the time impact this will have on passengers, stating that if assistance hasn't been arranged in advance, “there may be a wait whilst the correct vehicle to meet your needs is sourced.” Several stations are reducing the number of hours where staff are available, meaning more and more people will be subject to this lengthy and convoluted procedure, which further chips away at the provision of Turn Up and Go in a reasonable timeframe.

Furthermore, 3% of tickets will not be available for purchase online or at TVMs.

TransPennine say that “These products will continue to be available to purchase from TPE and other train operator ticket offices. However, until such time as we can make these products more readily available via other channels, we will also retain a ticket office machine at all our staffed stations so we can provide these products during station staffed hours.” Using the fact that these are available ticket offices run by other TOCs is not a reasonable mitigation, as the vast majority of these are also filing for closure. This leaves disabled people, such as wheelchair users requesting a D50, without equitable access to ticketing services. The proposal also seems to imply that the ticket office booth (and machine) will remain open, but without a designated staff member to staff it. This is a clear admission that ticket offices remain absolutely necessary, and provide services that cannot be fully replaced.

TransPennine also say they are investing in more TVMs, but do not appear to be investing in improvements to TVMs that would make them more accessible. TVMs will only be upgraded

to accept cash at 5 locations.

#### **4. Ways these proposals violate the Ticketing and Settlement Agreement**

We believe the proposals put forward by the above train operators violate the terms of the Ticketing and Settlement Agreement on the following grounds:

- Having to roam through the station to find staff means disabled people would not be able to access the assistance I need in a timely and easy manner, if at all. This would be a deterioration in the “quality of service” (16-8.1.a) (5.3)
- Disabled people having to rely on Help Points which are not always accessible, and often do not work. (16-8.3.iv, v, vii) Even when they do, they do not provide a comparably “personal service” to disabled passengers. (5.2)
- Disabled people can no longer be confident when arriving at a station, in member of staff will be able to be identified and provide assistance in a timely and easy manner. (16-8.3. ii, iii)
- Disabled people will no longer have “widespread and easy access to the purchase of rail products”, or the most “cost effective” option (16-8.1.a.i).
- The proposals represent a deterioration to the “current levels of accessibility to facilities for the sale of fares” (16-8.3.a.i).
- The alternatives to purchasing from a ticket, office means relying on are TVMs and online booking. These do not adequately account for the access needs of disabled passengers. (16-8.3.iv, v, vii)
- Without an accessible and timely way to purchase tickets, many disabled people will be unable to use the rail network from their local station. (16-8.3.ii, iii)
- The proposals will limit “access to emergency contacts” and increase response time for “emergency response to incidents”. It would also remove the only “identifiable location for getting help and visible staff presence that provides perceived and real safety and security benefits”, with no sufficient alternative. (5.3)
- The proposals would be a lapse in the operator’s duty to “safeguard the interests of passengers”, particularly disabled passengers. (16-8.3.iii, vii)