

Ticket Offices Consultation Summer 2023

A submission to Transport Focus & London TravelWatch – All stations, all Train Operators

An August 2023 supplement on Train Operator Equality Impact Assessments

At the time of our 26 July submission, few Train Operator Equality Impact Assessments had been published, but these have now generally been released.

We are very unimpressed with these. This is for two main reasons:

1. The main focus is usually on intending travellers who have protected characteristics and / or require formal assistance to travel – for instance, use of boarding ramps to get on or off trains or otherwise need to make a formal booking for assistance of some form. Those requiring less formal support are less well covered. For instance:
 - a. A word search of the Northern and the GTR EqIA's for mention of "Dementia" found nothing, despite passengers with dementia (or those travelling with them) being more likely to need assistance than the typical passenger.
 - b. Similarly we found no mention of "Autistic", nor "Asperger" – such passengers are again more likely to need help, but not formal assistance – a helpful staff member to guide and support.
2. There is relatively little focus on ticket purchase – For instance, the characteristics of travellers who currently use Ticket Offices and how they might be helped to use Ticket Vending machines (or online purchasing). For instance, is the challenge physical (operating the TVM / reading the screen), with the ticket selection process (understanding it, finding the right ticket etc) or with the purchase phase (using the card facility, inserting payment etc).

We think much greater attention needs to be given to the varying levels of assistance needed at a station and when that might occur. For instance, a traveller with the early stages of dementia, or with Aspergers may well require no assistance at all to travel through the station for their normal journey, when there is little or no disruption. But, in the case of disruption, or for other journeys (to different destinations, or possibly at different times), then greater informal assistance is likely to be needed, such as which platform, what to do to mitigate the disruption etc. Ticket Office staff can be key to this, and whilst moving said staff to the platform will often be a positive in these circumstances, the detail of the consultation shows that instead there will often be increased times of no staff at some TOC's stations.

A particular concern is the differing impacts of time at a station that is now to be unstaffed at times that a traveller uses that station. For instance, women, older people and those with protected characteristics often feel more vulnerable at stations that are not staffed during their visit.

We "tested" Equality Impact Assessments by reference to a self-defined list of 11 questions that deliberately placed less emphasis on protected characteristics and instead included tests relating to other aspects of equality. Our sample of three TOCs gave disappointing results – see Appendix A.

We also draw your attention to the DfT's [National Travel Attitudes Study Wave 8](#), released this month, in particular, observations on "[Feelings of safety during the various phases of a public transport journey](#)", which clearly shows 19% of men and 31% of women feel unsafe "some of the time". The presence of staff is an important mitigant to this, which we consider to be an equality issue due to the variance in proportions.

Appendix A: Assessment of selected TOCs against Railfuture’s questions

TOC		GTR	South Western Railway	TPE
Topic	Question	Answer	Comments	
General			In general, we can appreciate the benefits of SWR’s multi skilling proposals as it will get staff out from behind a window on to the platform to help those less able with every aspect of their journey including barriers and boarding the train. But there are still hurdles to overcome in respect of enabling passengers to purchase any of the full range of tickets and appreciate which offers best value.	
Buying tickets	1. Excluding the largest stations, is the TOC’s approach in-person ticket selling or providing a TVM concierge for those that cannot use self-serve at TVMs?	TVM concierge, with the option to travel to a station with a Ticket Office. But this is mainly relevant when the ticket can’t be issued, rather than the personal characteristics of the intending traveller make it difficult or impossible to use a TVM.	SWR’s approach is to provide a TVM concierge, but if all else fails, the opportunity to travel to a Category 1 station where an in-person sale is possible. SWR also promise to introduce TVMs with video call facilities, but the irony here is they’ve tried that before and for some reason (in 2021) they rapidly stripped out and disposed of all the newer TVMs with the video call option	TVM concierge
	2. Has the TOC assessed TVM usability for anyone who doesn’t meet the typical tests	No evidence of an assessment of the impact of those that are less able to use a TVM from ticket office to TVM. They do comment “All GTR TVMs meet the standards within the DfT code of practice and cover different aspects of design standards at stations. Page 131 of this standard covers TVMs and there are also minimum height requirements for wheelchair access.” But at a single page, we think this is probably insufficient detail	There is no evidence they have assessed this, but they promise to consult affected groups before implementation (see also Q11). One of our members comments “we had a blind person at our public meeting last month who wasn’t happy with the proposals - he normally uses an app but occasionally has the need to speak to a real person. He pointed out that, unless they’re in a fixed location, he wouldn’t be able to find them without asking other passengers which would destroy his independence.”)	Don’t need to stand (to see / reach the screen): No Can easily use touch screen with less than normal dexterity (arthritis etc): No Can use the touch screen with other tools (eg a pointer) EQIA goes into little detail about specific conditions. It does however say: <i>Customers who need to pay with cash, and customers with accessibility requirements who have been unable to purchase their ticket before boarding as a result of the facilities available, will be able to purchase their ticket on-board the train from the Conductor with no fine or additional charges applied.</i>
	3. Do TVMs offer the discounts available to people with specific characteristics such as wheelchair users, local bus pass users?	No; GTR comment “The next steps for these discounts are being discussed at an industry level (such as the future possible digitalisation of these discounts) but we will consider GTR level mitigating action should there be a delay in an industry solution for these discounts during implementation if the proposals are approved. In this circumstance, we would continue to comply with the commitment set out in our Accessible Travel Policy (ATP) that “If disabled customers are unable to purchase a ticket at a station before they travel due to our facilities being unavailable, they can buy a ticket	We regret we do not know the answer to this.	No specific detail given, but does refer to UPs (unusual products), which are currently only available from ticket offices and will continue to be available from a Ticket Office Machine (TOM – note distinction from TVM). A TOM will be retained at every TPE station but will only be used to issue Ups. All other tickets must be obtained from the TVM. TOMs will, of course, only be accessible in hours when the station is staffed.

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		without penalty at their destination or from on-board staff (where available)."		
	4. Is there at least one TVM at most stations that accepts cash?	Yes – GTR report 3 stations do not	Yes but often the cash facility is either not working or closed for security reasons.	No 5 of 16 stations will have at least one TVM that accepts cash
Meet & Greet	5. Has the TOC identified that for some travellers being able to find staff easily & consistently is of particular importance (eg the less mobile [for one or more of many reasons])	Yes; GTR comment “We are particularly mindful of the feedback from blind and visually impaired customers that it is vital for maintaining independent travel that there is a set static meeting point,”	Q5&6: They only promise to provide designated places for those who need assistance boarding the train. There is no mention of designated places where help with ticket purchase will be available.	Yes
	6. Has the TOC identified the need for new designated meeting points – and set some definitions as to how these points will be selected?	Yes – see above		No
Waiting for the train	7. Has the TOC identified the characteristics of those who are most likely to need support and reassurance short of formal assistance to board and alight the train (eg those more likely to feel threatened because of a reduced ability to move away or defend themselves)?	Yes, but limited in depth, and more on hard factors (eg boarding assistance) and less on soft factors. Mental characteristics such as Dementia, Autism / Aspergers seem to have received limited attention.	There is no evidence that SWR has considered these issues (One of our members states “they struggle during disruption with all passengers and the staff seem to exit very rapidly to hide in their safe offices to avoid all passengers seeking assistance. Often with the response I have no idea what is going on.”) However, on a more positive note, we consider that staff would be in a better position to assist if they are out and about rather than shut behind an office window.	Yes Within the 9 protected characteristics identified within the Equality Act 2010.
	8. Has the TOC identified when the people most likely to need support and reassurance are present at the station? Does this assessment include an assessment of the broader situation (eg light or dark, regular presence of sports fans)	No		No
	9. Has the TOC identified the need how to support those less able to support themselves during a disruption (eg one of more of	No		No

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	less familiar, without a smartphone, with sight or hearing difficulties)?			
By station	10. Has the TOC identified the need to consider the proportion of the mix of users at each of their stations (eg age profile of the local area, presence or not of a hospital)	No	<p>This extract from SWR's Station Change Proposals document says how they categorised their stations...</p> <p><i>Each station was assessed against the following considerations:</i></p> <ul style="list-style-type: none"> ▪ <i>The travelling distance between stations</i> ▪ <i>The number of tickets issued and types of tickets issued</i> ▪ <i>The current level of ticket office only fares</i> ▪ <i>The ease of transition to digital ticketing e.g. location of ticket vending machine</i> ▪ <i>The station's role during planned and unplanned disruption.</i> 	Yes
	11. Has the TOC published any station-by-station assessment of the above topics?	No, but they have confirmed it exists	SWR promise this: "An Equality Impact Assessment will be completed for every station affected by these proposals" and "We will consult with local accessibility groups on our proposals and our Accessibility and Inclusion Forum will continue to be integral to the process."	Yes (see the individual station details). Non protected characteristics (eg Aspergers) have generally not been considered – eg the Brough assessment only identifies those just released from Prison who are issued with a travel warrant (other than the 9 protected characteristics)