To: GWR.Consultation@Londontravelwatch.org.uk

From: Hazel and Steve Dawe, Cowley Area Transport Group – [www.catg.org.uk](http://www.catg.org.uk)

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Dear Great Western Railway,

**SUBMISSION TO CONSULTATION ON TICKET OFFICE CLOSURES**

We strongly object to proposals to close ticket offices at train stations managed by the following Train Operating Companies, as well as yourselves:

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

Our objections draw upon the Transport For All template letter, plus our own observations as rail users – particularly with regard to Oxford rail station during the last decade.

We object to ticket office closures on the grounds that this will make each afflicted rail station and its services inaccessible to disabled passengers. With regard to the Equality Act, disability is officially defined as:

You’re disabled under the Equality Act 2010 if you have a physical or mental impairment that has a ‘substantial’ and ‘long-term’ negative effect on your ability to do normal daily activities.[[1]](#footnote-1)

The Oxford ticket office is one of the most vital accessibility features of each station; it impacts everything from my ability to buy tickets, receive assistance, access site facilities, navigate the station, plan routes, and feel confident in making journeys.  As a city with millions of tourists each year and successive waves of foreign students, the ticket office is a key part of the way Oxford responds to these groups. We are concerned that no ticket office means serious problems for tourists and new students, not least since there will be serious limits upon how well railway station staff may serve them compared to the specialists in the ticket office.

The mitigations that have been proposed to address disability specifically are piecemeal and inconsistent. At one station, passengers may have to use a video-call function on a Ticket Vending Machine, at another they may have to call a mobile staff team, at another they may have to travel to a hub. This fractured approach will make navigating the railway prohibitively confusing, and fails to provide an adequate alternative to current ticket office arrangements.

We are concerned that the resulting problems will result in additional car use by people who may have used rail, increasing traffic congestion and pollution. In respect of the latter, the Government cannot undertake policies which undermine its own Climate goals, having been seriously condemned by the Climate Change Committee recently for its poor work in this area already. This could easily add to the legal challenges the Government seems willing to create for itself on its failing Climate policies. Given DfT projections of millions more vehicles in coming decades, it is vital rail plays its part in meeting the travel needs of more people. More ticket offices in more stations would be appropriate to this goal, lower fares, a simpler system of fares, and a return to public ownership.

Ticket office closure in Oxford’s very busy station would represent a deterioration in the quality of service received by disabled people, and would violate both the Equality Act (2010) and the Secretary of State for Transport’s Ticketing and Settlement Agreement ticket office guidance. We note that Transport for All is considering legal action about these proposals at present; that the Government has caused rail strikes by its obdurate unwillingness to protect people from inflation through pay increases; that ticket office closures add to the many types of action undermining rail use, particularly under-investment, the enormous costs of HS2, lack of a general policy to re-open rail lines – including the Cowley line and the Oxford to Witney/Carterton lines.

 **1. Availability of staff, assistance, and facilities**

Ticket office staff are our first point of contact when we arrive at the station, often for complicated longer distance journeys. Having staff at a designated place means we know where to go for assistance, information, advice, or the unlocking of a facility such as a toilet or waiting room. If staffing levels were reduced or existing ticket staff redeployed to ‘multifunctional roles’, we would lose this crucial point of contact. It would give students and visitors from overseas the impression that the UK is a developing country.

Multifunctional staff who roam around the station are not an accessible alternative for anyone. Disabled people with mobility or energy impairments cannot travel through the station to try and find assistance, and blind and visually impaired passengers will struggle to identify a member of staff. Ticket offices are also the only designated point in the station with a hearing induction loop. Many Deaf people will be unable to access the assistance they need without this. This is discrimination and is actionable under the Equality Act. The training that these new ‘multifunctional’ roving staff will be given has also not been made clear. While C2C have said that these new “Floor Walkers” will be provided the same training as current ticket office staff, this is unlikely to be adequate – new roles require new training in how to manage the varies duties assigned to staff. Covering new roles means that staff will not be able to display the in depth knowledge currently offered by ticket office staff.

There is no mention of how disabled people might be involved in co-designing how their needs are to be met. Failure to meet needs in rail stations has the potential to be discriminatory, including ticket machines not designed for use by the disabled, including the poorly-sighted.

This is not just a matter of formally-identified types of disability or impairment. Elderly people may well find using ticket machines daunting or not possible for them personally. We would expect Age UK to be challenging the discrimination of these proposals. We have written to them to query whether they will be doing this.

Without the staffed ticket office, we would have to rely on the Help Point to request assistance. These are often not clearly manned due to staff shortages, or not working, and are also inaccessible to many Deaf 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. Any rail operator failing disabled people like this is clearly engaged in discrimination.

Mobile response teams are also not a viable mitigation, especially if Help Points are the only way to get hold of them. The time it takes for these teams to be requested and make their way over will add to the already excessive journey times disabled people face, and adds to the uncertainty of whether we will be able to make our train.

This would violate the Ticketing and Settlement Agreement (2023) on the following grounds:

* Having to roam through the station to find staff means not being able to access the assistance needed 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)
* We would therefore have 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)
* For some, if they are not confident they can arrive at the station, identify a member of staff, and receive the assistance they need in a timely and easy manner, they might well be unable to travel from this station. (16-8.3. ii, iii)

**2. Accessibility of ticketing**

Closing ticket offices will require disabled or elderly people to purchase tickets through means such as online booking or through Ticket Vending Machines (TVMs) at the station. Neither of these options are accessible for many disabled people, and not automatically accessible to all elderly people either.  To avoid legal action for discrimination, the railway operator must keep ticket offices open.

Disabled people are disproportionately represented in the number of people with no access to the internet; 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. This makes online ticketing inaccessible for many.

This would leave TVMs as our only option. Many of these do not accept cash, which many disabled people often use for accessibility reasons. Some concessions and ticket types are also not available from some TVMs. For example, the 50% wheelchair user discount can only be purchased at ticket offices. Ticket office advice on journeys is far superior to what is available online, including access to cheaper tickets. Even if these options were made *available* at TVMs, they would still not be *accessible* to disabled people. TVMs lack tactile information and functionality, which is essential for blind and visually impaired passengers, while full height TVMS are positioned out of reach for wheelchair users. They are also very complex to navigate. This means often the correct or cheapest ticket is only available in the ticket office. Some operating companies have said they will include a video call feature on some TVMs so that staff can be called to assist. This does nothing to mitigate the fundamental accessibility issues already outlined. Even then, the proposals suggest these will only be available at some, not all stations. This is also discriminatory, and not sustainable in practice.

We also have concerns around the ‘Promise to Pay’ notice proposed by Northern Rail. Again, this is likely to be an incredibly confusing option, and again will not be accessible for those who cannot use TVMs for other accessibility reasons. Many operating companies have also failed to guarantee that all discounts and ticket options for disabled people will be available for purchase online or at TVMs. This will lead to disabled people being disproportionately overcharged, and denied access to the concessionary fares we are entitled to. Multifunctional roles would also require staff to work on both sides of the ticket gate line. This is a clear barrier to seeking support if a ticket is required before travelling past the gate line in order to go through the station to find assistance. This may require users to purchase any available ticket, travel through the station, find a member of staff, ask them to travel back to the ticket hall with the user, and then have them assist with purchasing the correct ticket: impacting on the would-be passenger’s time, energy and budget and that of pressed staff members too. This is not an acceptable alternative to our current ticket office.

The other mitigation proposed by several operating companies to keep ticketing staff at larger, busier stations (under the name ‘hubs’, ‘travel centres’, or ‘customer information centres’) has similar pitfalls. It is not reasonable to ask disabled passengers who cannot purchase a ticket without staff assistance to travel miles out of their way (at additional expense) to one of these stations in order to purchase a ticket. If an individual is unable to purchase a ticket, or board a train without staff assistance, it may be very difficult to actually *get* to one of these ‘hubs’ in the first place. Again, this is not a remotely acceptable mitigation.

Some operating companies have proposed using third party retail outlets to sell tickets. However, it has not been specified what training (if any) staff will receive at these 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.

This would violate the Ticketing and Settlement Agreement (2023) on the following grounds:

* We would no longer have “widespread and easy access to the purchase of rail products”, or the most “cost effective” option (16-8.1.a.i).
* It would represent a deterioration to the “current levels of accessibility to facilities for the sale of fares” (16-8.3.a.i).
* The alternatives we would be required to rely on are TVMs and online booking. These do not adequately account for the access needs of disabled passengers or the elderly. (16-8.3.iv, v, vii)
* Without an accessible and timely way to purchase tickets, many will be unable to use the rail network from this station. (16-8.3.ii, iii) This would be discriminatory and actionable.

**3. Safety and security**

Having visible staff at a designated ticket office is also important for safety and security, as they are the location where staff can offer immediate help in an emergency. Protection of the public, including women travelling alone, depends upon rail station staffing and may well be a factor in the choices of travel mode people make.

Disabled people are at a higher risk of having a health-related emergency than non-disabled people. Disabled people are also at higher risk of hate crime. Between 2021-2022, hate crimes in England and Wales have increased by 26%, with disability related hate crimes increasing by 43%. Therefore, disabled people need to know where they can quickly find and identify a member of staff. Closing the ticket office in Oxford would make the services here less safe and less accessible.

Proposing that disabled people rely on Help Points to reach staff assistance in an emergency is not a viable option. As well as the inaccessibility of these Help Points outlined earlier, and their abysmal success rate, passengers cannot expect an emergency response if they first have to find a Help Point, be put through to a call centre, and or wait for a mobile team to come to the station and find them. Staff have to be visible and on hand quickly for any meaningful emergency response to be available.

This would violate the Ticketing and Settlement Agreement (2023) on the following grounds:

* It would 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)
* It would be a lapse in the operator’s duty to “safeguard the interests of passengers”, particularly disabled passengers. (16-8.3.iii, vii)
* It might limit the ability of some to use the rail network from this station. (16-8.3.iii)

Yours sincerely,

Hazel and Steve Dawe

COWLEY AREA TRANSPORT GROUP – [www.catg.org.uk](http://www.catg.org.uk)

1. <https://www.gov.uk/definition-of-disability-under-equality-act-2010> [↑](#footnote-ref-1)