



WinVisible  
women with visible & invisible disabilities

Transport for All  
Access, Rights, Advice

**Dear Transport Focus & London Travelwatch,**

We are writing to you to object to the proposed closure of nearly 1000 ticket offices at Avanti West Coast, C2C, Chiltern, East Midlands Railway, Greater Anglia, GTR (Great Northern, Thameslink and Southern), Great Western Railway, LNER, Southeastern, South-Western Railway, West Midlands (including London Northwestern Railway), Transpennine Express and Northern.

**We believe that if these closures go ahead, it will be disastrous for passenger accessibility, safety, security and service, and therefore the proposals must be rejected.**

**We are opposed to the proposals for the following reasons:**

**Accessibility for disabled, Deaf and older people**

Ticket office closures would cause a significant worsening of the facilities and support offered to disabled, Deaf and older people. Already, disabled people face numerous barriers in accessing the rail network and are three times less likely to travel by rail than non-disabled people. Twenty-two percent of the population had a disability in 2020/1 and since 2002/3 the number of people reporting a disability has increased by 3.8million (+35%).

The presence of staff is vital for ensuring the railway is accessible to all. At many stations ticket office staff are the only staff present, and their responsibilities often include assisting passengers on to trains, including with ramps where required and meeting them off the train. Ticket Vending Machines (TVMs) are not accessible for many disabled people, the functionality is poor and there is no interaction, unlike in the ticket office. Disabled people are much less likely than non-disabled people to have access to the internet, and online ticketing is not accessible for many people.

Ticket offices provide a fixed location for passengers to locate staff. This is particularly important for many disabled people who would not be able to search a station for a roving member of staff, who may or may not be present at the station. Guide dogs are often trained to learn the route to the ticket office.

## **Widespread and easy access to the purchase of rail products**

We believe that passengers would no longer have widespread and easy access to the purchase of rail products and best value fares if the ticket office closures went ahead.

There is substantial demand for the ticket office. While the Government says that 'only' 12% of tickets are sold at ticket offices, in 2022/23, there were 1.5 billion passenger journeys in Britain, which equates to around 180 million journeys being facilitated by ticket offices.

There are a range of products and services available at the ticket office, which may not be available from Ticket Vending Machines (TVMs). This includes refunds, season ticket changes, ranger and rover tickets, ferry/bus connections, park and ride, group save, disabled persons discount, season tickets over one month in length, advance fares, rail card purchases, off-peak tickets before 9.30am, changes to ticket classes, seat reservations, cycle reservations, photocard for season tickets, scholar tickets, sleeper bookings and car parking.

Using TVMs is a one-sided process, there is no interaction between customer and retailer like there is in the ticket office. In contrast, ticket office staff can ask customers questions about their journey and requirements to ensure they get the right ticket for their journey and can offer a range of routes and classes.

Many TVMs do not take cash, or permit a part cash, part card payment. Given that people on lower incomes and older and disabled people are more likely to use cash, these groups stand to be disproportionately affected by ticket office closures and may find it difficult to travel as a result.

Unlike ticket office staff, TVMs do not automatically offer passengers the cheapest ticket for their journey, or clearly explain restrictions on certain fares, such as operator-specific tickets. Indeed, there is no requirement in the DfT's Schedule 17 guidance for TVMs to offer all fares. This risks passengers losing widespread and easy access to a range of products and fares.

## **Quality of Service**

Ticket offices provide passengers with dedicated advice and expertise about their journey and onward travel. They can tailor their service to meet their customers' needs in a way that TVMs or online ticketing is unable to. At many stations access to facilities such as toilets, disabled toilets, waiting rooms and lifts is dependent on ticket office staff.

Having 'roving' staff, no longer based in the ticket office, not only makes them more difficult to locate, which is particularly problematic for many disabled and older people, but also diminishes their ability to give tailored and one-on-one advice.

## **Safety at station for passengers**

Staffed ticket offices have an important role in supporting passenger safety and security. Ticket offices provide a place of safety for both staff and passengers. Requiring staff to undertake transactions out on the platform puts both passengers and themselves in a more vulnerable position.

Ticket office staff are trained and experienced in dealing with difficult incidents and the presence of staff deters abusive and anti-social behaviour.

Ticket office staff provide support and assistance to passengers during times of disruption or in response to emergencies and their role often includes carrying out safety and security checks at the station throughout the day.

### **Impact on staffing levels**

It is clear that the purpose of wholesale ticket office closures is to significantly reduce staffing across the rail network and we are very concerned that the Government and train operators have given no commitment that staffing numbers will not reduce as a result of ticket office closures. Instead, on the day that the public consultations were announced, the train companies issued s188 redundancy notices putting around 2300 station staff jobs at risk.

It is also of significant concern that if ticket offices are closed, there would no longer be any statutory regulation of staffing provision at stations and the passenger watchdogs would have no formal role in monitoring this. Undoubtedly this will lead to reduced staffing provision at stations.

Ultimately, for the reasons set out above, we believe Transport Focus and London Travelwatch must reject all the proposals to close ticket offices (or reduce ticket office hours) at Avanti West Coast, C2C, Chiltern, East Midlands Railway, Greater Anglia, GTR (Great Northern, Thameslink and Southern), Great Western Railway, LNER, Southeastern, South Western Railway, West Midlands (including London Northwestern Railway), Transpennine Express and Northern.

Yours Sincerely,

**Mick Lynch, RMT General Secretary**

**Priya Sahni-Nicholas, co-Executive Director, Equality Trust**

**Janaya Walker, Public Affairs Manager, End Violence Against Women Coalition**

**Stephen Brookes MBE, Rail policy Adviser, Disability Rights UK**

**Linda Burnip and Paula Peters, Disabled People Against Cuts (DPAC)**

**Greater Manchester Coalition of Disabled People**

**Svetlana Kotova, Director of Campaigns and Justice, Inclusion London**

**Jan Shortt, General Secretary, National Pensioners' Convention**

**Caroline Strickland, CEO, Transport for All**

**Kelechi Chioba and Claire Glasman, WinVisible (Women with visible and invisible disabilities)**