



London Underground Ticket Offices
Review of closure programme
Submission to London TravelWatch 2

Thank you for reviewing on behalf of the Mayor of London, Transport for London's programme of Tube ticket office closures. We have already set out our views to you during previous consultations and in our submission emailed on Tuesday 4 October. We re-iterate those points and build on them with the latest information below.

As anticipated by the bulk of passengers with whom our members had contact prior to the start of the Tube ticket office closure program, the removal of ticket offices has resulted in the provision of a poorer service to customers. Further, we believe that following the closure of ticket offices, there is ample evidence to substantiate those concerns.

From passengers unable to rectify incorrectly charged for journeys (eg due to gateline technology failures) to passengers squabbling over who is next to speak with a roving member of staff, chaotic ticket hall scenes have become routine. Long lines of visitors disembarked off mainline services queuing for ticket machines, while proximate ticket offices are screened off and left unused have been noted in the media. Overall, the impression formed by many visitors to the city, exacerbated by ticket office closures, is that peak travel on the transport network is insufficiently safe and incompetently managed.

TfL presented the closure of ticket offices as motivated by a desire to improve customer service. Of course, it was transparently never anything of the sort. The spin placed on the change was essentially a cynical attempt to obfuscate away from the financial pressures on TfL to reduce operational expenditure. We agree with Labour Member of the Greater London Assembly Navin Shah that ticket office closures have presaged a reduction in staffing levels. TfL itself confirm that staffing levels relative to volume of passengers have dropped.

We note the results of your 2013 focus groups with passengers. We also note Director of Research, Tim Bellenger's observation in his recommendation to London TravelWatch board members on 1 February 2016 that "there is significant public opposition to the proposal". We are disappointed that despite the above, London TravelWatch did not oppose the closure of station ticket offices, even when given the formal opportunity to do so (ie when administering the consultation on the ex-Silverlink station ticket offices).

We believe that your role in representing the views of passengers, required you to unambiguously oppose the withdrawal of services, the maintenance of which passengers reasonably believed to be in their interests. Even though you did not do so earlier, we hope your retrospective assessment of Transport for London's closure programme will fully reflect passengers' views and not be moderated to better fit with your earlier acquiescence.

Given that London TravelWatch claims credit for formulating the concept of the "virtual ticket office" we doubt that London TravelWatch can be considered independent/ neutral on this issue. We expect London TravelWatch to set aside its previous judgements on ticket offices and the close working relationship its staff have with Transport for London staff. We look forward to London TravelWatch

assessing the ticket office closure programme solely on the basis of passengers' interests and not through the prism of extraneous issues such as TfL's temporary funding shortfall.

We are concerned about London TravelWatch's ability to hold TfL to the commitments it makes in relation to attempting to mitigate for the loss of ticket offices. TfL's undertakings about keeping ticket offices open on the ex-Silverlink line were not maintained. For example, TfL's commitment to keep ticket offices open 7am – 7pm at a variety of stations until at least December 2016, were quickly discarded. Even though this was a commitment made to London TravelWatch in return for the organisation's support for its proposed closure programme, TfL opted to only open a number of the ticket offices during peak times (or in response to requests for tickets which could not be purchased on TVMs).

Further, we are concerned about London TravelWatch's ability to adequately scrutinise the claims made by TfL. For example, the claims made by TfL about the functionality of upgraded ticket machines were manifestly and continue to be untrue. Specifically, ticket machines cannot perform 99.9% of the tasks carried out at ticket offices – as set out below.

In terms of the types of tickets that are available to passengers, ticket machines are not an adequate replacement for ticket offices. Specifically, the following is a non-exhaustive list of the tasks that are performed at ticket offices, but which cannot be carried out at ticket machines:

- Topping up Oyster cards with exact amounts with card and/or notes - e.g. £6.50 (Zones 1-2 cap), £9.30 (Zones 1-4 cap), etc.
- Topping up Oyster cards with less than £5 with card and/ or notes (any Oysters with a negative balance, Child/ 16+ Oysters or any Oyster with a current discount privilege - especially important as a minimum £1.50 top-up has been imposed at non-LU Oyster Ticket Stops since 2 January 2016).
- Oyster journey history statement printouts and receipts detailing tickets purchased
- Mixed tender payments - e.g. part cash and part card
- Purchase of annual season tickets (<http://www.mayorwatch.co.uk/tfl-apologises-after-season-ticket-renewal-complaints/>)
- The ability to pay with £50/ Scottish Bank notes and 1p, 2p and 5p coins
- Refunds of Oyster cards (with a PAYG balance above £10 or with a valid season ticket or purchased less than 48 hours ago)
- Refunding last PAYG top-up or whole PAYG balance or using PAYG balance to offset the price of a season ticket (e.g. a customer who mistakenly topped up, when intending to purchase a season ticket)
- Odd period season tickets (longer than 1 month - e.g. 6 weeks and 5 days)
- Season ticket changes - e.g. customer wishes to increase/ reduce the number of zones of their season ticket
- Mainline discounts on single tickets (London Underground's machines only sell mainline railcard discounted travelcards)
- Upgrading a London Underground paper single/ return to a London Underground paper travelcard
- Replacing damaged paper travelcards
- Using a ROLT/RLMP to replace a ticket lost in a ticket gate

- Purchasing some of the wide range of mainline tickets - e.g. Advance, Super-off peak, Open singles/ returns
- The acceptance of cheques and warrants
- Sale of point-to-point season tickets
- Privilege-rate Mainline paper tickets
- Boundary Zone Extension tickets to mainline stations (for travelcard season tickets not including Zone 1)
- The ability to purchase group tickets for more than 19 people in a single transaction
- Refunding Same Station exits (more than 30 mins)
- Excess fares window (helps deter and offset losses to fare evasion)

Our broader concerns about the closure of ticket offices have previously been well-ventilated and London TravelWatch has itself considered the issues at length. We reiterate the points previously made, endorse the view of MPs who signed Early Day Motions on the issue – including EDM 1706¹, EDM 1109², EDM 787³ and EDM 957⁴ and list some of the additional key ones below here for your convenience:

Passengers find it harder to obtain advice on tickets and fares without a staffed office

Feedback from our members is that passengers are often tentative about approaching them in the ticket hall. Even where passengers appear to want advice on a journey or using a machine, they are frequently shy about requesting assistance. Staff can take steps to mitigate this – but obviously within limits. This was of course never the case with ticket offices as the function of staff in the offices was clear to everyone.

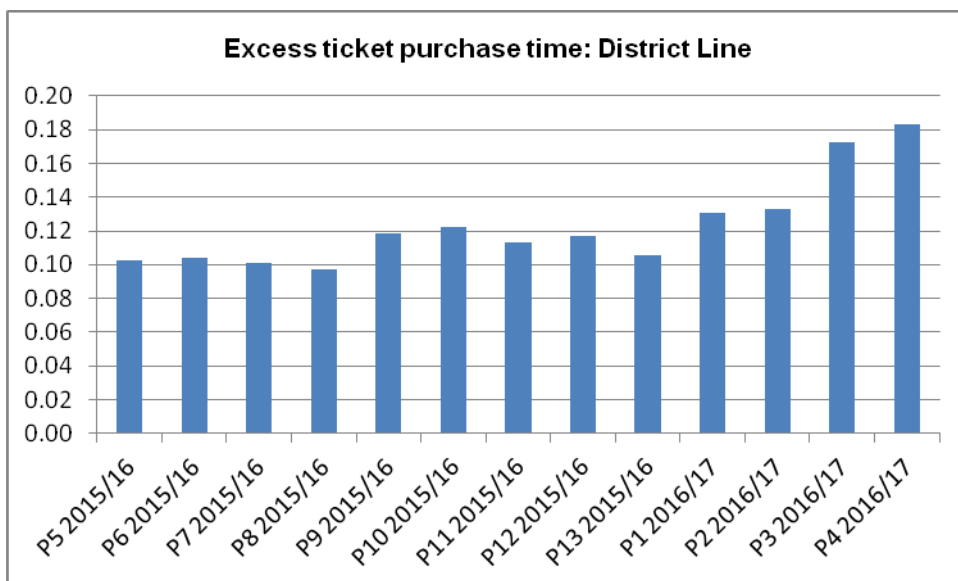
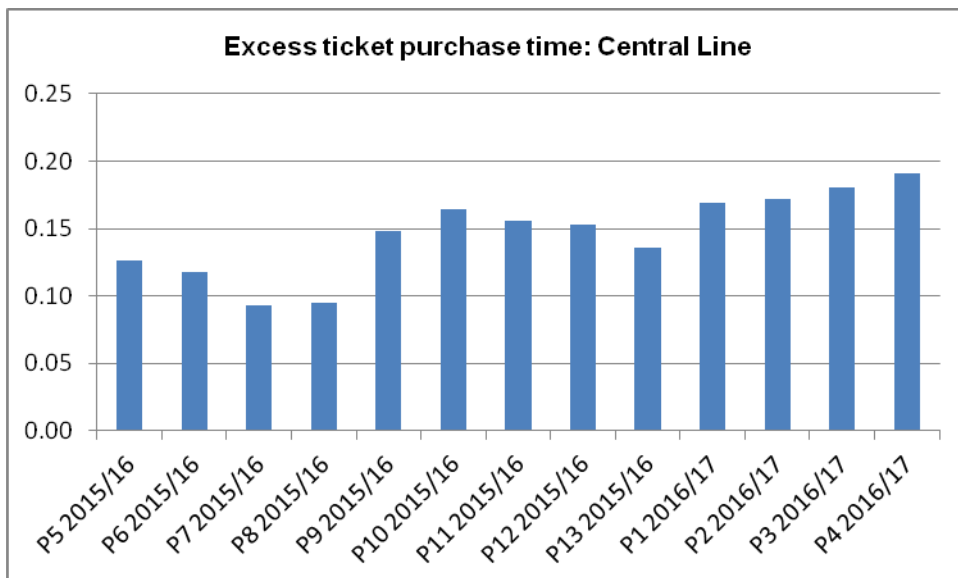
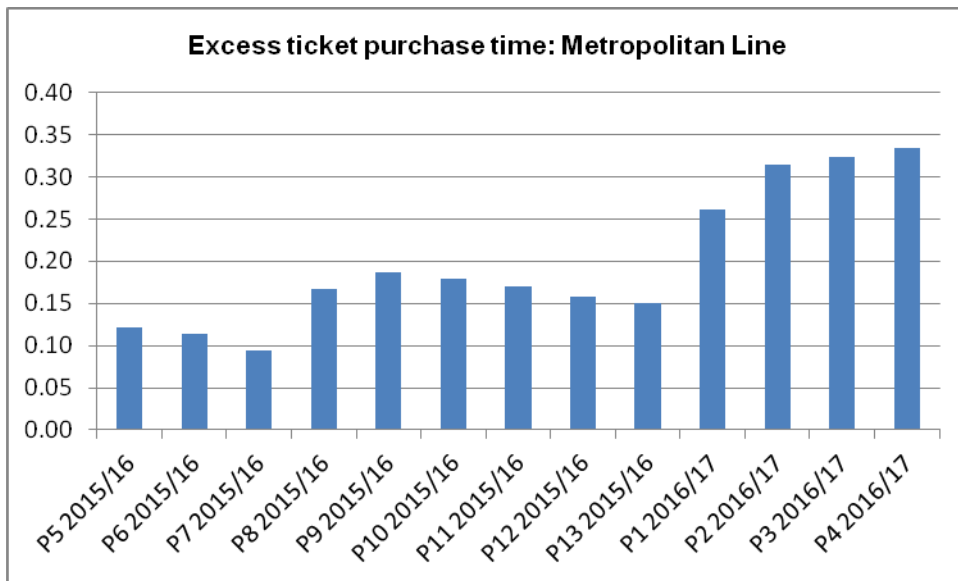
Where a passenger does require assistance, they frequently have to be referred to other sources of assistance – ie to the phone helpline (from where they are often referred back to the station) or online. This is exasperating for passengers and undermines passengers having a positive perception of the administration of public transport in London.

¹ <https://www.parliament.uk/edm/2006-07/1706>

² <http://www.parliament.uk/edm/2009-10/1169>

³ <https://www.parliament.uk/edm/2013-14/787>

⁴ <http://www.parliament.uk/edm/2015-16/957>



There are insufficient numbers of ticket machines leading to delays and impaired through flow of passengers

Not all ticket halls are suited to the placing of large ticket machines. The time it takes to carry out transactions at ticket machines is longer than for those at ticket machines. Transactions at ticket machines are much more likely to be held up and require staff assistance to correctly complete. The substantial sums being invested in ticket machines, which will likely soon be obsolete, is a poor use of limited TfL funds.

The lack of ticketing facilities is also impacting on TfL revenue. Specifically, it is frequently the case that due to lack of ticketing facilities, station staff are instructed to let customers travel without valid tickets. This situation occurs a number of times a day at multiple stations and persists for prolonged periods. We anticipate that the accumulated impact on TfL revenue, will likely have negative consequences for the provision of services.

Vulnerable or less technically minded passengers, perhaps including the elderly, disabled or visitors, may be less confident using a ticket machine and could end up overspending or being deterred from travel

In terms of visually-impaired people, where ticket offices are retained, people can learn the route to the ticket office window, but where ticket offices have been removed our members report that such customers are struggling to locate mobile staff. Further, ticket machines are touch-screen and do not deploy audio or tactile operation technology, so cannot be used unaided by many visually-impaired people.

In terms of hearing-impaired people, ticket office windows have induction loops, but obviously a mobile member of staff does not. Finally, in terms of mobility-impaired people, the design of ticket machines (e.g. absence of a level counter for sorting change) is inadequate. We therefore believe that the steps which TfL has taken to accommodate disabled users is insufficient to mitigate the loss of ticket offices.

Tube ticket offices at hub stations

A number of the ticket offices which were operated by London Underground are in stations which are also an integral part of the National Rail network. Given, on the National Rail network, the limited use of smartcards/ the lack of a standard pattern timetable/ a simple fare structure, there is such stations to retain adequate face-to-face ticketing facilities.

Crime

Another factor is deterring crime against passengers. We agree with the concerns in this regard of Dawn Butler, MP for Brent Central, remembering the appalling murder of Tom Ap Rhys Pryce⁶. She is correct that the ability of staff to safely oversee the ticket hall and safely be able to summon assistance is enhanced by staff being located in and having access to the secure confines of a ticket office.

Many of the stations which shed their ticket offices first showed a significantly higher level of reported criminality. For example, statistics produced by the British Transport Police for Wembley Park station (ticket office removed) show 54 criminal and anti-social behaviour offences reported committed in 2015 (up from 44 the year before)⁷. Whereas at nearby Wembley Central station (ticket office retained

⁵ <https://data.london.gov.uk/dataset/london-underground-performance-reports/resource/c3ecab2b-5acf-4124-8dd5-fb4ae7c016e5>

⁶ http://www.kilburntimes.co.uk/news/dawn_butler_mp_brent_overground_ticket_office_closures_could_cost_lives_1_4374865

⁷ <http://crimemaps.btp.police.uk/data/?q=Wembley%20Park,%20Wembley,%20Wembley,%20Greater%20London%20HA9,%20UK#station>

for longer) there were just eight criminal and anti-social behaviour offences reported committed in 2015 (down from 16 the year before)⁸.

Obviously there are many variables underlying the occurrence and recording of crime. However, there is a wealth of international research specific to public transport showing that where the level of official control differs, certain types of crime (eg theft and sexual assault) are often displaced to locations where criminals feel more confident that they will not be caught. This is a plausible hypothesis in understanding crime fluctuations in Wembley, which further research would likely support.

We hope you will support the recommend the re-opening of ticket offices on London Underground – spefically the re-commencement of the provision of services to passengers from those locations. We look forward to reading your response to this consultation.

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October 2016

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<http://crimemaps.btp.police.uk/data/?q=Wembley%20Central,%20Wembley,%20Wembley,%20Greater%20London%20HA0,%20UK#station>