

Jacqui Russell
Head of Consumer Team



TOC MDs; and
TOC accessibility leads
[by email]

5 July 2023

Dear Industry Colleagues

Station ticket office reforms

Operators have today published consultations on proposals to make changes to the responsibilities of station staff and to close ticket offices. I am writing to provide an overview of a number potentially relevant regulatory considerations that may be helpful as you refine your plans, and to formally ask you to provide an initial high-level review of your proposals against ORR's Accessible Travel Policy (ATP) guidance.

Changes to ticket office opening hours

Changes to ticket office opening hours (including closures) are governed by the processes set out in the [Ticketing and Settlement Agreement](#) (TSA) and [guidance](#) published by the Department for Transport (DfT). Alongside, ORR has a long-term ongoing role in ensuring that passenger interests are protected in key areas, underpinned by licence requirements and consumer law.

Under DfT's guidance, any proposal to close a ticket office is considered to be a major change. Operators must publish details of their proposals, with passengers invited to make representations to Transport Focus (TF) and London TravelWatch (LTW). TF/LTW may then seek amendments to proposals from the operators. Should concerns remain they can raise an objection to the Secretary of State who will make a final decision.

Accessible Travel Policy review

All train and station operators must establish and comply with an ATP as a condition of their licence, setting out their provision for disabled passengers. ATPs must meet the detailed requirements set out in our [guidance](#). While these requirements are

particularly relevant to disabled people, such as the provision of assistance to travel, they can equally be applied more widely and, in this context, that includes requirements relating to ticketing and passenger information. The Annex extracts those aspects of the ATP guidance that are potentially relevant to changes to station staffing and ticket offices.

To ensure that your ATP remains accurate for passengers and meets the requirements of the ATP guidance we are seeking an initial understanding of the areas where we believe that early engagement on changes will be helpful, including where we can provide additional clarity or support in this process.

Your response should:

- Provide a high-level summary of the changes that you are proposing to make to ticket offices and station staffing.
- Identify any areas where you anticipate proposing changes to your ATP documents, and where possible outline what those changes would be.
- Identify any other changes that you propose to make at stations to ensure compliance with the ATP guidance, with particular reference to the areas identified in the Annex.

We do not expect to request or receive revised ATP documentation until there is more certainty over the changes that may be implemented. The process for revising ATPs will then follow the usual process. As part of this we will expect you to show how you have sought and considered feedback from local groups, and we will consult with DPTAC, Transport Focus and (where relevant) London TravelWatch where any material changes are proposed.

Please contact David Kimball (david.kimball@orr.gov.uk) if you have any queries. We will be inviting operators to a meeting to clarify ATP requirements and the review process, and to offer the opportunity to explore any questions you may have.

Please submit your response to ATP@orr.gov.uk by Friday 21 July.

I am copying this letter to RDG, DfT, Transport Focus, and London TravelWatch.

Yours sincerely

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ANNEX: Summary of relevant ATP requirements.

This table summarises those requirements in ORR’s Accessible Travel Policy [guidance](#) that have particular relevance to the roles of station staff. **Please refer to the guidance itself for the full description of requirements.**

Area	Requirement	ATP guidance
Unbooked assistance (Turn up and go) (Assistance includes help with: journey planning, getting on and off the train, getting around the station, purchasing tickets, help with luggage).	Operators must provide assistance where it has not been arranged in advance, where reasonably practicable. Operators must provide clear and reasonable justification to passengers where assistance cannot be provided.	A 1.2f
	Where an operator may be considering a change to train or station staffing levels, they must have clear measures in place to ensure that passengers who have not booked assistance in advance can still receive it in a safe manner.	A1.2f
Booked assistance (passengers must be able to book assistance up until 2 hours before travel)	Operators must provide assistance, when booked in advance, at any station during the hours that trains serve that station.	A.1.2.c
	Where booked in advance, operators must assist passengers off a train at its final destination within 5 minutes, where reasonably practicable.	A.1.2d
	If assistance is provided by station staff, there must be a phone number and a member of staff responsible for receiving calls, and operators must follow the handover protocol.	A.1.2e Appendix C
	Operators must consider how assistance will be provided at part-staffed and unstaffed stations that are accessible to a passenger. They may use accessible taxis but must also consider other options such as on-board, station, mobile staff.	A.1.2.h
	Operators must provide assistance if trains are re-platformed at short notice, where reasonably practicable.	A.1.2i A6.3
	Operators must provide a designated meeting point for use by people that have booked assistance to meet staff.	A2.4.4
Disruption	Passengers must be able to inform operators when there is a problem, particularly at unstaffed stations.	A2.3.1c
	Operators must assist passengers at times of disruption, delay or emergency. They must do everything possible to ensure that, wherever possible, passengers can continue their journey during disruption	A6
Ticket purchase	Operators must set out how they will ensure that, where disabled passengers are unable to buy a ticket at a station before their journey, they are able to buy a ticket without penalty on the train or at their destination.	A3.1
	Ticket vending machines (TVMs) must allow passengers to purchase tickets at the reduced rate for	A.3.2

	holders of a Disabled Persons Railcard, and the holder's companion.	
	If a station is unstaffed, or staff are not in attendance, ticket gates must be locked open	A.3.2
	Operators must warn passengers against purchasing tickets they cannot use e.g. when purchasing first class tickets, passengers should be warned if there is no wheelchair space in first class.	A3.3
Passenger information	A passenger leaflet, which explains to passengers how to book assistance, what assistance is available, and where to get further information must be widely available including at staffed stations	A2.1.1 A2.1.3 3
	Operators must set out how they will ensure staff at stations have access to up-to-date station accessibility information and are able to provide this information to passengers on request	A2.2.4
	Operators must inform passengers on board trains and at stations when there is disruption, diversion or delay, whether assistance has been booked or not. This must include clear aural and visual information to direct passengers to accessible substitute transport	A2.3.1c
	Passengers who require assistance must be able to get all the information that they need at a station from a single source.	A2.4.1
	There must be clearly-marked information points at all category A, B and C stations, which are easy for disabled people to use, with timetables, posters, info leaflets and other materials placed so that both wheelchair users and standing passengers can use them, wherever possible. These must be open whenever the booking office is open, and have up-to-date information on facilities, services, accessibility; timetables; fares; connections; delays and disruption; confirmation of any help arrangements made via Passenger Assist (including bookings by other operators), and; the services and facilities provided by other operators calling at the station, as well as the accessibility of other transport near the station.	A2.4.2
	At unstaffed stations, easily accessible information must be provided regarding nearest staffed station.	A2.4.5