

Action Disability Kensington & Chelsea's Access Group,
ADKC Centre, Whitstable House,
Silchester Road, LONDON W10 6SB.
Tel: 020 8960 8888; Fax: 020 8960 8282

Re: Letter of objection to ticket office closure proposals

Dear Sirs,

We are writing from Action Disability Kensington and Chelsea (ADKC), an organisation with approximately one thousand members, which is run and controlled by local disabled people and supports its members to live independently. Our ADKC Access Group campaigns for an inclusive society and more fully accessible places. Please, visit our website for more information: [Home | ADKC](#).

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

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

We object on the grounds that it will make the station and its services inaccessible to disabled passengers. The ticket office is one of the most vital accessibility features of this 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.

The mitigations that have been proposed to address this 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.

This 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.

1. Availability of staff, assistance, and facilities

Ticket office staff are my first point of contact when I arrive at the station. Having staff at a designated place means I know where to go if I require 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', I would lose this crucial point of contact.

Multifunctional staff who roam around the station are not an accessible alternative for me. 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. 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 various duties assigned to staff, and no mention has been made of how disabled people will be involved in co-designing this, or any commitment to roll this out before ticket offices are closed.

Without the staffed ticket office, I would have to rely on finding the Help Point to request assistance. These are often not clearly signposted, or not working, and are inaccessible to many Deaf people. They may be located on platforms, beyond the ticket gate line. 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.

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 we/disabled people would not be able to access the assistance we need 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/disabled people would therefore have to rely on Help Points which are not always accessible to us, 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)
- If we/disabled people are not confident we can arrive at the station, identify a member of staff, and receive the assistance we/disabled people need in a timely and easy manner, we/disabled people will be unable to travel from this station. (16-8.3. ii, iii)

2. Accessibility of ticketing

Closing ticket offices will require us 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.

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 myself and others.

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.

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.

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 us to purchase any available ticket, travel through the station, find a member of staff, ask them to travel back to the ticket hall with us, and then have them assist us with purchasing the correct ticket: impacting on our time, energy and budget. 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, there may be little way for them 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/disabled people 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/disabled people would be required to rely on are TVMs and online booking. These do not adequately account for the access needs of disabled passengers like ourselves. (16-8.3.iv, v, vii)
- Without an accessible and timely way to purchase tickets, we/disabled people will be unable to use the rail network from this station. (16-8.3.ii, iii)

3. Safety and security

Having visible staff at a designated ticket office is also important for our safety and security, as they are the location where staff can offer immediate help in an emergency. 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 that we can quickly find and identify a member of staff. Closing the ticket office 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 would limit our ability to use the rail network from this station. (16-8.3.iii)

Based on the above, we would like to kindly ask for your assistance and support in our continuing campaign for all travel service providers and authorities to properly accommodate the needs of all disabled and elderly people in London.

Thank you in advance for your understanding and support.

Yours Sincerely,

The Action Disability Kensington and Chelsea’s (ADKC) Access Group