

# Transport Salaried Staffs' Association

Devonshire Buildings, 16-17 Devonshire Square, London EC2M 4SQ

t 020 7387 2101

f 020 7383 0656

e [enquiries@tssa.org.uk](mailto:enquiries@tssa.org.uk)

London TravelWatch  
Europoint  
5-11 Lavington Street  
London SE1 0NZ

11<sup>th</sup> October 2019

By email to: [consultations@londontravelwatch.org.uk](mailto:consultations@londontravelwatch.org.uk)

Dear Sir or Madam,

**RE: TRENITALIA c2c STATUTORY CONSULTATION REGARDING A MAJOR CHANGE  
PROPOSAL IN ACCORDANCE WITH CLAUSE 6-18, PARAGRAPH 2, TICKET AND  
SETTLEMENT AGREEMENT (TSA)**

I am writing to you in connection with the above matter on behalf of TSSA.

TSSA is recognised by Trenitalia c2c Limited for collective bargaining purposes and has been involved with industrial relations discussions in connection with the company's proposal that affects 10 stations with ticket offices in London and a further 15 outside the Capital.

We OBJECT to the proposal by c2c Rail Ltd to make changes to the Ticket office opening hours at Fenchurch Street, Limehouse, Barking, Upminster, Ockendon, Chafford Hundred, Dagenham Dock, Rainham, Purfleet and Grays railway stations for the following reasons.

1. **Compliance with Government guidance**

The government guidance levels of about 12 ticket issues per hour as a measure to determine the proposed new opening/closing hours has not been fully adhered to by c2c.

Several of the above mentioned stations generate ticket sales in excess of 12 issues per hour outside of the new proposed opening/closing hours.

As a result, numerous ticket offices, and the services they offer, will be closed at a time when there clearly remains a significant public demand. Therefore, this

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General Secretary **Manuel Cortes**



change does not represent an improvement on current arrangements of quality of service nor will it allow members of the public to enjoy widespread and easy access to the purchase of rail products.

On the basis of the above arguments, TSSA union reps who work in the c2c ticket offices and have first hand experience of these and the other issues identified in the following pages, presented c2c management with a series of counter proposals, all of which were rejected by the company (see Appendix “A” which references all of the affected stations, not just those in the London TravelWatch area). It should be noted that in rejecting the counter proposals, c2c could not give justifiable reasons and refused to supply more recent data.

## 2. Misleading data used to justify changes

The Ticket issues data used by c2c is historic from a period dating back from Sept-Dec 2018. Not only does this mean that the proposal is based on figures for this time last year (rather than the most recent), it is also before the introduction of c2c’s new PICO Ticketing system:

- a. Since the introduction of PICO many stations have seen an unprecedented increase in queues during the morning peak, this is due to PICO being a significantly slower system than its Tribute predecessor (see some of the images in Appendix “B”);
- b. This in turn has led to a noticeable change in customer demand levels at ticket offices during the evening peaks for those wishing to avoid the morning queues.

c2c have not adequately factored this phenomenon in and its impact should these proposed changes be allowed to happen.

**We would strongly recommend that c2c are made to produce current ticket sales data to ascertain whether the proposed closures are still justified, as it would be in the public interest to do so.**

## 3. Impact of new Ticket Vending Machines not accounted for

c2c have yet to roll out their new Sigma Ticket Vending Machines to all stations across the route so their reliability and its impact on the public has yet to be determined.

At the handful of stations these TVM’s have been installed, they have so far proved to be:

- a. highly unstable and continually drop in and out of service throughout the

- day;
- b. extremely difficult to navigate and are in no way user friendly.

We believe this last assertion is supported by c2c's statement within the consultation document "c2c staff, including those on gate lines, will receive training and briefings about the new machines and their enhanced functionality." We would contest that if staff are required to be especially trained and briefed in using the TVM, then what chance do the untrained, non-briefed public stand?

Due to this poor functionality and complicated fares structures TSSA members have reported a big increase in the TVM issuing the wrong ticket and having to change it at the ticket office - which will not be possible if the office is closed or the station unstaffed.

#### 4. New ticket machines are not a replacement for ticket offices

There will be no staff presence on many stations throughout the day once the ticket office closes. The help and support for customers requiring assistance with regard to the:

- a. New TVM's,
- b. Provision of up to date travel information or
- c. Requiring assisted travel

This non-existent assistance is not an improvement to services for the public.

Equally as important is that the new Sigma TVM's do not have all the functions currently available at ticket offices including:

- a. Ranger/Rover tickets,
- b. Family Travelcards,
- c. Selected Promotional Fares,
- d. Oyster top-up

Tickets not available on new Sigma TVMs can be seen at the link on this note.<sup>1</sup>

On this basis, we contend that the new TVMs should in no way be viewed as an adequate replacement for the ticket office.

#### 5. Ticket office duties should not be measured by ticket office sales data alone

The use of the ticket sales formula to measure the opening hours of ticket offices is not completely representative of what will be lost when hours are reduced or offices closed altogether on a particular day. This is because, as we will show later

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<sup>1</sup> See: <https://share.vodafone.com/ftsf-a4f1accd-c316-4fd7-8890-a62e6217a856>

in the section on Station Agents, ticket office staff in c2c are required to provide a range of duties beyond only selling tickets. These other duties include:

- a. Dealing with security and safety patrols as well as anti-social behaviour including physical assaults, acid attacks, sexual assaults;
- b. Station fault reporting;
- c. Lost property and reuniting customers with their belongings;
- d. Sometimes reuniting customers who have been separated from their children;
- e. Dealing with service disruptions;
- f. Maintaining ticket vending machines including emptying, topping up, ticket rolls, fault fixing;
- g. Retrieving tickets swallowed by the gates, re-booting the gates, overseeing the gates;
- h. Evacuating stations when necessary;
- i. In bad weather, ensuring the station remains safe through “killfrosting” and snow clearing or mopping out flooded areas;
- j. Assisting customers who are ill, and so on;
- k. Recently, the ticket offices have also just begun to have equipment installed at all stations which will allow staff to issue and load Smart cards;
- l. Stations such as Fenchurch Street, Limehouse, Barking and Upminster all issue Oyster cards.

## **6. Loss of quality of service and especially the turn up and go assisted travel policy**

Staffed ticket offices are a key role in delivering a quality of service the public has come to expect, including a turn up and go policy on assisted travel (as promised in c2c’s Customer Charter<sup>2</sup>).

Though not part of the schedule 17 consultation, c2c have made reference to the removal of first to last staffing at numerous stations across the route, including in London: Limehouse, Dagenham Dock, Rainham, Purfleet and Ockendon.

The significance of this is the impact on assisted travel. We would particularly draw attention to c2c’s Travel Assistance commitments<sup>3</sup> and the impact on the stations operated by the company which ensures that not only are they accessible for disabled passengers, but travellers can “turn up and go”.<sup>4</sup> Cutting ticket office hours and reducing the number of staff present will seriously impinge on ensuring maintaining accessibility, something that has already been picked up by customers.

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<sup>2</sup> See page 21, c2c Customer Charter December 2018 which can be downloaded from: [https://www.c2c-online.co.uk/app/uploads/2018/12/Passenger\\_Charter\\_Dec\\_2018.pdf](https://www.c2c-online.co.uk/app/uploads/2018/12/Passenger_Charter_Dec_2018.pdf)

<sup>3</sup> See: <https://www.c2c-online.co.uk/help-feedback/travel-assistance/>

<sup>4</sup> See Page 7 of Making Rail Accessible: Helping Older and Disabled Passengers available at: [https://www.c2c-online.co.uk/app/uploads/2018/11/3478\\_-dpp\\_leaflet\\_web.pdf](https://www.c2c-online.co.uk/app/uploads/2018/11/3478_-dpp_leaflet_web.pdf)

Further, in 2018, c2c took part in an Office of Rail and Road consultation on Assisted Travel.<sup>5</sup> We would draw attention to the company's responses<sup>6</sup> to Questions 9, 15, 17 and 21 which acknowledge difficulties other TOC's may experience due to unstaffed stations but this is not an issue for c2c as they have fully staffed stations from 1st to last service - **this will not be the case under these proposals.**

c2c has also indicated that 'Mobile Teams' of security personnel are now available to be deployed to assist where needed. The reality of this is that:

- a. Each 'Mobile Team' consists of **just one person** who will have to cover three stations and are wholly reliant on the train service to ferry them between each location when needed;
- b. In the majority of cases these 'teams' will not be available until 8pm in the evening, leaving many stations completely unstaffed.

This does not represent an improvement to the current quality of services provided.

#### **7. Loss of first to last staffing despite franchise contractual obligations and customer pledge**

Staffed ticket offices have been an integral part of c2c's first to last staffing which is a committed obligation under their Franchise Agreement, this is reiterated within c2c's Passenger Charter<sup>7</sup> which pledges to staff all stations from before the first train arrives of service until after the last train of service departs.

It appears c2c are now renegeing on this pledge/committed obligation by proposing to close ticket offices early and leave stations completely unstaffed for significant parts of:

- a. Weekdays (eg, Limehouse, Ockenden, Purfleet, Rainham);
- b. Weekends (eg, Dagenham Dock, Purfleet, Rainham).

This will be detrimental to the public's enjoyment of current services available.

#### **8. Failure of previous attempt to withdraw from first to last staffing at every station**

First to last staffing was first introduced by c2c in 2015, one of only two operators

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<sup>5</sup> See: <https://orr.gov.uk/rail/consumers/consumer-consultations/improving-assisted-travel-consultation-2018>

<sup>6</sup> See the c2c entry in: [https://orr.gov.uk/data/assets/pdf\\_file/0013/41521/improving-assisted-travel-consultation-responses-july-2019.pdf](https://orr.gov.uk/data/assets/pdf_file/0013/41521/improving-assisted-travel-consultation-responses-july-2019.pdf)

<sup>7</sup> See Page 18, see document in previous note.

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to have this standard (the other being London Overground).<sup>8</sup>

In 2016/7 c2c made an application to the Department for Transport for a derogation of their Franchise Commitment to provide staffing at every station from “first to last service.” The application was refused.

In addition c2c provided detail of their Franchise Commitment (redacted from the publicly available version of the Franchise agreement between the DfT and Trenitalia<sup>9</sup>):

**67.1 STATION AGENTS**

67.2 As soon as reasonably practicable following consultation with all relevant stakeholders, including but not limited to the Secretary of State, interested Trade Unions, the Passenger’s Council and the London Travel Transport Users Committee, the Franchisee shall redeploy the relevant Franchise Employees who are stationed in the ticket office to a more flexible customer-facing role (Station Agent) on Station platforms and concourses. Station Agents shall perform functions including:

67.2.1 assisting customers in using TVMs and smart kiosks

67.2.2 providing information to customers; and

67.2.3 providing staff presence at Station between the period commencing 5 minutes prior to the arrival or departure time of the first timetabled Passenger Service to arrive at or depart from a Station and until the arrival or departure time of the last timetabled Passenger Service to arrive at or depart from a Station.

It would be in the public’s interest that these Franchise Commitments are clarified with the DfT as it is an integral part of the background information within c2c’s Ticket Office Schedule Consultation, should stations become unstaffed once the Ticket Office closes.

**9. The London Mayor’s commitment to first to last staffing**

Arriva Rail London, which operates the London Overground concession, brought forward a proposal in 2018 that would have seen a number of its passengers adversely affected by ticket office closures and cuts to hours. However, when the proposal was first referred to London TravelWatch changes were made to that scheme. Subsequently, the proposal came before the Mayor of London in accordance with Schedule 8 of the Railways Act 2005. This led to the decision not only not to close any staffed ticket office but also that:

<sup>8</sup> See: <https://www.railpro.co.uk/railpro-magazine/november-2015/top-of-passengers-list>

<sup>9</sup> See page 239 of Essex Thameside Franchise Agreement (Rail Public Register Copy) at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/821712/essex-thameside.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/821712/essex-thameside.pdf)

“All stations will continue to be staffed from 15 minutes before the first train of the day until 15 minutes after the last - a continuing commitment that makes London Overground stations stand out on the national rail network.”<sup>10</sup>

We would argue that the same arrangement should apply in c2c with its first and last system because the same issues of personal security and customer assistance apply on this railway as they do on the London Overground network.

## 10. Loss of jobs in ticket offices

The consultation details that appear on the company’s website<sup>11</sup> confirms that there will be no compulsory redundancies amongst the affected staff although a voluntary redundancy offer is being across the company to free up posts for displaced ticket office staff.

However, what it doesn’t say is that the proposal does cut out a significant number of ticket office jobs. For example, at Chafford Hundred station there are currently 3 full time staff but the company are proposing to reduce this to 1 person. C2c has also proposed major cuts to existing part time jobs which will mean further displacement of staff.

Staff have the option to be redeployed to alternative roles, including those associated with working on the Gateline. On the Gateline, however, staff can find themselves exposed to an increased level of physical and verbal assaults. The growing threat of violence against station staff (which includes the Gateline) is a real issue in the industry at present, as reported by the Railway Safety Standards Board in its latest Annual Safety Performance Report.<sup>12</sup>

The pattern of job losses is repeated across the route at various stations and indicates that the motive behind the scheme is about cutting costs to enhance the company’s financial performance - and absolutely nothing to do with enhancing customer service or the travelling experience of passengers.

## Conclusion

TSSA calls on London TravelWatch to recognize that the information provided by c2c to justify its proposal is outdated and fails to reflect the actual level of tickets currently sold per hour through the PICO system. It also fails to recognize changing customer

<sup>10</sup> See: <https://www.london.gov.uk/press-releases/mayoral/mayor-tfl-to-keep-overground-ticket-offices-open-0>

<sup>11</sup> See: <https://www.c2c-online.co.uk/media-centre/latest-news/ticket-office-consultation/>

<sup>12</sup> See page 123-124, RSSB’s “Annual Health & Safety Report A reference guide to trends on GB railways 2018/19” downloadable from: <https://www.rssb.co.uk/en/Standards-and-Safety/Improving-Safety-Health--Wellbeing/Monitoring-safety/Safety-Performance-Reports>

demand levels or the additional services provided by c2c ticket offices. On this latter point, one of the most important activities is that of the turn up and go disabled assistance that will be undermined by cuts to ticket office opening hours, preventing access to trains by disabled people and potentially leading to disability discrimination claims. We have also drawn attention to the franchise contract's committed obligation around "first and last" staffing which c2c seem only too willing to overlook and would ask if the Department for Transport has actually authorized this change when we know that the Mayor of London remains committed to it.

In re-stating our objection to the proposal, we believe c2c will fail to meet the requirements of the Ticket and Settlement Agreement 6-18 para 2 should they be granted permission to make the proposed changes to ticket office opening hours on the grounds listed above. The proposed changes do not represent an improvement to services for the public and is in fact a detriment.

We hope our Objections are viewed seriously and given due diligence.

Yours sincerely

Rob Jenks  
Policy Advisor

