

GTR Equality Impact Assessment

Section 1- Initiative Details

Title: GTR Ticket Office Project (V1.3)

Section 2- Impact

Is there a potential negative impact?

Disability

Based on Passenger Assist data from the previous 6 periods (P11 to P3), we assist an average of over 6000 customers with Assisted Travel bookings every rail period (4 weeks). We support thousands of more turn up and go customers assistances in addition to this as most of our disabled customers prefer to travel on this basis on our network.

We provide a broad range of assistance to make sure all disabled customers can travel with us independently and with confidence, which is underpinned by robust accessibility training and processes. We also offer a range of support tools and continually seek to grow and increase these to better support all disabilities, visible and non-visible.

Our network is one of the busiest in the country and we manage 239 stations, as well as running services through non-GTR managed stations. We have a range of assistance mechanisms to support assistance provision on our different operating models across our network, such as station staff, onboard supervisors and mobile assistance teams. The proposals impact the majority of our stations with 192 separate station level equality impact assessments (EIA) having been carried out to support this. These assessments will remain live documents while reform works are ongoing, as will this overall GTR level EIA.

The proposed changes could have an impact on some of our assistance processes and operations, which we will carefully consider in order to take appropriate mitigating action as necessary in order to support disabled customers during any transition period. Noting however, that GTR already has established processes in place to support accessibility when ticket offices are already closed, as is for example often the case in the evening at many locations. Our approach to mitigation also applies to access to station facilities and making sure they are available to customers to the same extent as at present. We remain committed to making our services accessible for all and our anticipatory duty to make reasonable adjustments.

We are also aware that retail changes set out in the proposals could have a greater impact on disabled customers such as digital accessibility, accessibility of ticket vending machines, specific discounts for wheelchair users and blind and partially sighted customers (D34 & D50) which are only available from ticket offices and the use of cash.



Some of the mitigation work will be discussed at an industry level to negate the risk of a fragmented approach across train operating companies (TOCs), including retail, ticketing and assistance propositions.

Age

Many customers who travel with us are older and more likely to need additional support, and many of our stations are located in places with high populations of retired people.

Rail travel is often an important mode of public transport for older customers who may not have a private vehicle so rely on public transport.

Many bus routes connect people with our stations, especially in more rural areas.

In addition to this, older people may not be as familiar and comfortable buying tickets online or through other digital means and may need more support during a transition period. Many older people use cash as their main payment method when buying rail tickets.

We will take this into account and identify necessary actions to mitigate this potential impact.

Pregnancy and Maternity

Many customers who travel with us are pregnant or are parents with small children. In some areas train travel is relied upon by these customers.

We offer a range of support to these customers, such as baby on board badges and priority seat cards. Our step free facilities also benefit people travelling around with prams, such as lifts and enclosed waiting rooms. Many of our stations also have baby changing facilities.

These changes could have an impact on the support we provide these customers and access to facilities. We will therefore consider these impacts and how to mitigate to make sure support remains available.

Section 3- Outcome

Evidence

At the outset we would like to highlight for both the GTR EIA and the Station EIAs that the current consultation will provide a further source of evidence (in addition to any other consultation activity GTR may be undertaking) and that the EIAs will be updated to reflect this.

Relevant data was considered and utilised including to support across all station EIAs. This data included Passenger Assist bookings data for previous 6 months (this period



was chosen as it best reflects the way customers are travelling and booking assistance following the increased volumes of customers now travelling post-Covid).

Our data on unbooked assists is captured via either the Passenger Assist staff app (for stations taking part in the adoption pilot of this app) or an internal SharePoint assistance form that all other frontline station colleagues are asked to complete when they provide any assistance to our customers. However, unbooked assist data is captured on a best endeavours approach and recorded volumes are likely to be lower than the actual number of assists provided due the fast paced and often unpredictable operational nature of the running a railway. Our priority will always be providing a safe service with a high level of customer service and so expect the real number of unbooked assists delivered is higher than what has been recorded to date. However, the Passenger Assist staff app is supporting improvement in this area.

Station level EIAs have been undertaken which feeds into this overall GTR EIA for workforce reforms. This is in addition to a wide range of customer insights, such as unbooked assistance volumes, assisted travel customer satisfaction surveys, accessibility mystery shopping and customer relations data. As previously stated these station level EIAs will remain live documents while these reform works are ongoing, as will the GTR overall EIA.

Accessibility

The below questions were covered in the station level EIAs. This assessment is designed to provide a GTR level overview of the points covered

Please describe in detail the impact of the proposed change (all questions are mandatory).

1. Who is the person currently responsible for receiving calls and coordinating assistance at this station?

This answer covers the overall GTR position. Every station on our network has a set process for coordinating assistance depending on their level of staffing, physical accessibility and mode of operation of the services calling there.

There is little anticipated risk to assistance provision at any station likely to be impacted by potential reform as customers. Under the proposals no station that is currently staffed will become unstaffed and so there will be no change to customers' ability to contact a member of staff at a station during staffed hours, whether they are travelling on a booked or unbooked basis. We will still assist customers in line with current processes across our network, whether this is provided by station staff, onboard staff or established mobile assistance teams and already have effective procedures in place for providing assistance either outside of staffed hours or at unstaffed locations. We will consider feedback from customers and take mitigations to make sure any risk to how we provide assistance is mitigated.

Stations served by mobile assistance teams or with services that have onboard staff are also supported and coordinated by the assisted travel team based in our Rail Operations Control.



2. How are assistance bookings currently managed and logged at this station?

This answer covers the overall GTR position. No negative impacts are anticipated in the management or logging of assistance at stations affected by workforce reform. We have adopted the Passenger Assist staff app to coordinate and have clear visibility of all booked assistance requests. We have also briefed our colleagues to use this app to record turn up and go assistance so this tool will become a regular part of the assistance process at our stations.

All station and onboard teams have now been trained and have access to this staff app and all assistance logging will go through this method from mid July 2023.

The app will support our station and onboard teams with the management of assistance delivery on our services. However, it will not replace our established handover protocol where the origin station calls ahead to the destination to provide relevant information and arrange for the customer to be met on arrival there.

At unstaffed and partially staffed stations our Rail Operations Centre (ROC) Assisted Travel team coordinate and manage assistance requests (booked and unbooked), which may be through mobile assistance team, onboard staff or alternative transport as per current processes.

3. How do customers currently request TUAG assistance at this station (e.g. via staff, Help Point)? What measures could be put in place to ensure that passengers who have not booked assistance in advance can still receive it in a safe manner?

This answer covers the overall GTR position. A large number of our customers travel on an unbooked basis and this is something we want to encourage and are dedicated to supporting. Customers have several options for requesting turn up and go assistance at our stations including speaking with station staff to arrange assistance for their chosen train, via a station Help Point using the assistance/ emergency button and via a freephone number to ROC Assisted Travel team based in our control centre (text phone option also available).

These options mean that customers are always able to speak to a member of staff at all times trains are running.

Although there is little anticipated impact to assistance provision as a result of potential reforms that can't be mitigated, we are looking into how we can make it as easy as possible for customers to contact a member of staff at any GTR station, such as additional signage advertising the freephone telephone number and a robust review of our station help points.

4. Are station Help Points located in accessible locations with clear signage located nearby?



This answer covers the overall GTR position. Station level EIAs have covered this on an individual station level. We also have station maps indicating Help Point locations at all stations that have them. We will be reviewing these findings and taking any necessary improvement action to make sure customers are always able to get in touch with a member of staff from whichever GTR station they are travelling from.

Further details on mitigation plans related to Help Points can be found in the mitigation section.

5. Is there a taxi drop off and pick up point? Is it accessible?

This answer covers the overall GTR position. Our station level EIAs have captured this information for individual stations. However, we do not anticipate the changes being made under potential reforms will have an impact on this.

6. Does this station have any Blue Badge parking?

This answer covers the overall GTR position. Our station level EIAs have captured this information for individual stations. However, we do not anticipate changes being made under potential reform will have an impact on this.

We are mindful that not all customers who need support in relation to parking may be a Blue Badge holder, for instance older customers who may prefer to arrange and pay for their parking at the station. Customers can also pay for parking via our ticket machines at some stations and may need staff help with this. We will review our staff training to make sure station staff can continue to provide this assistance at the required locations.

7. Will there always be a member of staff responsible for receiving calls available to answer the dedicated assistance telephone number at all times trains are calling at that station?

This answer covers the overall GTR position. All our station staff have access to the Passenger Assist staff app on an individual mobile app provided to them. We have rolled this out with a dedicated training package and local area champions to make sure everyone is able to use this app when providing or coordinating assistance. This includes conductor and onboard supervisor colleagues.

In addition to this under our handover protocol all stations have a dedicated assistance number to support the call ahead process for arranging assistance at the destination. These are available on our internal station phone directory app.

Some stations serve as hubs for phone diverts for stations that are unstaffed or partially staffed to make sure assistance requests can be fulfilled at all times trains are running. This includes our ROC Assisted Travel team acting as a central coordination point for our onboard staff on Southern.

We have a number of processes in place to make sure assistance is available to customers at all of our stations at times trains are scheduled to call there. We will carry out a review to make sure that any diverts or processes currently in place remain suitable for any changes made under the proposals.



8. Is this station a “hub” for diverts of dedicated assistance telephone numbers for nearby stations? What ramp maintenance checks are currently in place at this station?

This answer covers the overall GTR position. These details were captured by station level EIAs and are operational processes established under our Accessible Travel programme of improvements undertaken between 2020-2021. As mentioned in the answer for question 7 we will carry out a review to make sure that any diverts or processes currently in place remain suitable for any changes made under the workforce reform proposals.

Our ramp maintenance check processes are well established and there will continue to be robust checks in place for these important assets. We also have set fault reporting processes managed by our facilities department. These processes are not anticipated to be impacted by workforce reforms.

9. Could there be any impact on availability of staff to deliver ramp assistance?

This answer covers the overall GTR position. At stations where there are staff available now to provide ramp assistance there will still be staff available to provide ramp assistance under the proposals. We have a range of mechanisms in place for this, including station staff, onboard staff and mobile assistance teams.

At the majority of Southern stations affected by the proposals there are onboard supervisor or conductors onboard every train calling there, who will be able to provide assistance on or off a train. In most cases these stations are only partially staffed at present and assistance is already predominantly provided by onboard staff. A small number of Southern stations will be covered by existing mobile assistance teams who are already active within the area at the times of day where they are proposed to become unstaffed.

This is an area we continually monitor to make sure the operations we have in place across our network make our services as accessible to all customers as possible.

10. Will the station be unstaffed at any times when services are still calling there?

This answer covers the overall GTR position. We have a mixture of staffing models and station opening hours across our network. The majority of stations covered by the proposals will remain staffed for the same hours as they currently are but by multi-skilled staff. However, there are some stations within the proposal that have a reduction in station staffing hours. The reduction in staffing hours is small in most cases and only a small proportion of stations included within the proposals are affected and have existing support mechanisms in place to cover the hours these stations would become unstaffed. For instance, the affected stations on our Southern coastway routes have a member of onboard staff on every train calling there who is able to provide assistance and sell tickets.



As is the case now, there is always a way for customers to contact a member of staff when stations are unstaffed, such as through a station Help Point or our freephone number. Part of our station level EIAs has been to review what, if any, improvements might be needed to make sure that all customers have this information should they need it. This would be an improvement on our current offering and would help mitigate the proposed reduction in station staffing at the affected stations.

11. Is it common for trains at this station to be replatformed at short notice? If yes, please describe action taken to support disabled customers in this situation.

This answer covers the overall GTR position. Station level EIAs have assessed this at an individual level. At locations subject to short notice replatformed services, plans are already in place at a local level to make sure all customers are informed and supported.

We do not anticipate any impact on this area from the proposals. However, it is something we monitor from a range of insights and can take improvement action if a particular location at risk becomes apparent.

12. Where is the current designated assistance meeting point for this station?

This answer covers the overall GTR position. At the majority of staffed stations the ticket office is the designated meeting point for customers who need assistance. Our station level EIAs have been reviewing this on a local level to help us collate this information.

We understand how important meeting points are as a consistent static point for customers to seek assistance and will be reviewing their locations as part of the proposals to establish a new policy for our station meeting points. This will also give us the opportunity to make sure they are in the best place for customers who need assistance (ie. easy to find and in an accessible location) and work with industry partners on a consistent approach across the country.

13. What is the current process at this station for contacting customers with assistance bookings if the booking is affected by disruption and making alternative arrangements?

This answer covers the overall GTR position. Currently the approach taken at stations to support customers during disruption vary although are underpinned by core processes and support tools (including alternative route maps, ticket acceptance and alternative accessible transport).

These proposals present an opportunity to refresh and rebrief our core processes to make sure our customer facing colleagues can provide the best support possible to all customers during these times. They will be more visible and will also receive specialist training to make sure they have the skills needed to advise customers during times of disruption.



Our ROC Assisted Travel team also play an important role is supporting customers travelling on our Southern conductor and onboard supervisor routes, as well as a key point of contact for disabled customers during their journey.

14. What are the current processes for checking and reporting faults with: 1. station lifts; 2. station toilet facilities; 3. Help Points; 4. CIS/PA systems?

This answer covers the overall GTR position. We have well established checking and fault reporting processes with already cover both staffed and unstaffed stations on our network.

We do not anticipate the workforce reform proposals will have a significant impact on these areas as there will be staff at all stations currently staffed who are able to carry out regular checks. We will also have processes in place to maintain access to station facilities to the same extent so the staff responsible for this will provide an additional level of assurance to these important facilities.

15. Could the proposed change have any impact on entry or exist routes at the station?

This answer covers the overall GTR position. Details of this have been captured for each station included within the proposals, and will be fully reviewed. However, it is unlikely that these proposals will impact entry or exit routes at stations as those stations with staff now with still have staff under the proposals.

If it was proposed that an entry or exit route was to be closed under these proposals, or any other proposals, we would assess the change to make sure that there was no negative impact to accessibility at the relevant station.

16. Could the proposed changes result in the permanent closure of any entrances or gates at this station? Could this lead to a reduction in accessibility for disabled passengers to any platform or facility at that station?

This answer covers the overall GTR position. This information has been captured at a local level and will be reviewed. However, it is not anticipated that there will be any permanent closures of any entrances or gates at stations under the proposals.

We are committed to making our stations as accessible as possible for all customers. To mitigate the impact the proposals could have on the availability of station facilities such as accessible toilets, we will identify an appropriate member of staff who will be responsible for making these facilities available to customers to the same extent as they are under the current station staffing hours. This could be another member of station staff, mobile assistance team staff or other member of staff as appropriate for this station.



17. What impact could the proposed changes have on the station emergency and evacuation plans? Could this impact how disabled customers are supported in these situations?

This answer covers the overall GTR position. Details have been captured for individual stations through the local station level EIAs and will be reviewed. However, there is no anticipated impact from the workforce reform proposals on this area at stations not subject to reduced staffing hours as existing plans already take accessibility into account. Our current plans take into account supporting all customers and stations that are staffed now, will remain staffed under these changes. If any changes are required it is expected that these would be minor and due to safety reasons that are in the best interests of customers.

At stations that have proposed reduced station staffing hours we recommend a review is undertaken in conjunction with relevant safety representatives to understand the impact and update the plans with any required changes.

18. Could the proposed change have any other impact on: 1. physical accessibility or step free access at this station; 2. how assistance is provided on a booked or turn up and go basis; 3. on disabled people compared to non-disabled people?

This answer covers the overall GTR position. These proposals will not change the step free categorisation of any of our stations. We are committed to making our network as physically accessible as possible and work closely with Network Rail and the Department for Transport on Access for All schemes. We are fortunate enough to have stations that have benefitted from this scheme and have improved step free access as a result. We have many more similar schemes to add new lifts at more of our stations, as well as supporting initiatives that provide other physical accessibility improvements, such as accessible toilets. Our commitment to improving physical accessibility will not be impacted by the workforce reform proposals. Many existing ticket offices are inaccessible and the new proposed model of more visible ticketing assistance will help break down barriers to inclusive travel and mean more customers are able to receive individualised support.

We have well-established processes in place that make sure our services are accessible to disabled customers. Although the proposals may mean a change in the way some of our stations coordinate assistance, customers should not be impacted and will still be able to receive assistance in the same way at their station, whether they are travelling on a booked or turn up and go basis. The majority of our customers travel with us on a turn up and go basis and our colleagues receive accessibility training and ongoing briefings to make sure everyone is supported on their journeys.

While we note that there may be an impact on some disabled people, or others with protected characteristics, as a result of these changes we are confident that we will be able to take appropriate mitigating action and make reasonable adjustments as required. There may be some customers that require additional support with the transition from the current model to the model proposed and this will be more readily available from more visible staff who have had training to give them the skills they need to support all customers. We have long standing processes in place to support accessibility and are always looking for new ways to improve the service we offer disabled customers. Our



support tools are available to customers to give them more confidence on their journey but are supplementary to the vital role our frontline people play in making our services accessible and inclusive to all. Under the proposals there will still be staff at all stations that currently have staff and we will continue to provide assistance at all of our stations. One area we will be focusing on is refreshing our approach to station meeting points. We recognise how important designated and well-marked meeting points are for many customers who need assistance and will discuss next steps at a GTR and industry level to provide clear guidance on this to customers and avoid a fragmented approach.

The ability to purchase the appropriate ticket is also a major consideration, and we will continue to meet the obligations set out within our Accessible Travel Policy (ATP). Our ticket vending machines sell most types of tickets and can apply railcard discounts such as the Disabled Persons Railcard. There will also be staff readily available to provide ticketing assistance at stations that currently have staffed ticket offices. Our onboard teams will also be able to sell customers tickets if they are unable to buy one before travelling, and disabled customers can also purchase a ticket at the destination if necessary without penalty in line with our ATP.

With the introduction of hub stations and the proposal that customers may have to travel there to purchase a ticket not available digitally or on a ticket machine, we are mindful of the impact this could have on disabled customers. This is why we are working at an industry level to find a solution for the specialist discounts (D34 & D50) that are only currently available at ticket offices. For other ticket types only available at hub stations, any customer who has to travel to a hub for this reason will never have to pay more for their ticket than would have been the case before the proposals and there will be a policy to reimburse any additional cost incurred.

Additional training will be designed and delivered to frontline colleagues providing ticketing assistance to make sure they have the skills and knowledge to support all customers purchase an appropriate ticket, including those that do not have good access to digital options. Customers will still be able to pay for tickets using cash at all but three stations, and we are looking at mitigations in respect of those stations. However, we understand that the changes proposed represent a significant shift to a more digital and modern approach at our stations and we will need to offer more support to some customers as a result, such as older customers who may not be as familiar or comfortable buying tickets online or through other digital methods. Our next steps will take this into consideration, for instance with additional staff training and customer information taking into account best practice and feedback following the consultation.

We are also mindful of concerns over the availability and accessibility of our ticket machines. All of our current ticket machines comply with the Department for Transport's code of practice in relation to accessible features. We also have processes in place for maintenance and staff training.

Closure of ticket offices could have an impact on hearing induction loop facilities, although the real life lived experience of these systems has varied across our network. As part of mitigation work, we will be consulting with organisations representing customers with lived experience to find a solution to this change.

We are also mindful of access to customer facilities remaining available at stations to the same extent as they are before the proposed changes are implemented, such as accessible toilets and baby changing rooms. This will be considered for each location in



line with our station level EIAs and wider review work at GTR and industry levels. Additional safety reviews will also take place to make sure that alternative solutions are identified and actioned for any emergency alarms currently connected to ticket offices (such as alarms in some station accessible toilets).

The safety and well-being of our colleagues and customers is a priority for us and we want to provide assurance that we will take any mitigating action needed to make ensure the safety of customers travelling on our network.

Our station level EIAs will remain live throughout the period of reform and will undergo review to identify any improvements to how easy it is for customers to request the help and assistance they need and any other ways we could improve our accessibility offering. This will feed into a wider GTR level review to make sure all customers are supported through the transition. This will also remain a live and agile document throughout this time to make sure we are capturing all potential negative impacts on protected characteristics and implementing any necessary mitigations to support customers and inclusive travel on our services.

Consultation

A public consultation on proposals will take place. Relevant stakeholders, including organisations representing disabled people, will be able to share their feedback and views on the proposed changes via this process.

Mitigating Action

We have undertaken station level EIAs on stations that would be affected under the reform proposals. These documents will remain live and agile throughout the time of the consultation and implementation if approved, to make sure that any potential negative impacts on those with protected characteristics are appropriately mitigated. We incorporated a standard set of questions within these station level EIAs to collate consistent information across all affected stations and help us assess potential impacts on our legal and licence obligations and gather evidence in relation to this. We will continue to collate and review the findings and suggested mitigations from these assessments while these works are ongoing to make sure that our overall GTR level EIA accurately reflects the mitigation action and feedback on which it is based. We envisage common themes will be seen which will need a consistent approach to be designed and delivered at a central level, such as a review of the meeting point policy. This will be a business priority to make sure any potential impacts on customers will be minimised and appropriately mitigated. As a result, this GTR level EIA will also remain a live and agile document throughout the period of change.

We are conscious that there are many train operating companies making similar proposals which would mean a large-scale shift for customers in relation to rail travel, and the corresponding need to work with these operators and other industry partners to promote the opportunity to take a consistent approach to the supporting customers. This is particularly important in relation to disabled and older customers so that we take consistent mitigations and avoid a complicated and fragmented network.

We will also consider a range of customer insights and feedback received through the public consultation and broader stakeholder engagement, which will account for an



additional source of evidence upon which these equality impact assessments can be based. This will ensure that we can consider any mitigation action needed during and following a transition period if the proposals are approved. We are mindful of our obligations under the Equality Act 2010, and particularly the duty to make reasonable adjustments for disabled customers.

We will now outline several key areas that we have identified as needing mitigating action. At this stage we do not have all the answers and will work collaboratively across the business, with industry partners and groups and organisations representing customers (particularly disabled customers) to implement the best mitigations possible.

Meeting Points

We recognise that one of the biggest concerns under these proposals for disabled customers is the change from the default position of the ticket office being the meeting point customers could go to request assistance. We are particularly mindful of the feedback from blind and visually impaired customers that it is vital for maintaining independent travel that there is a set static meeting point, and the impact moving staff out of the ticket office and around the station could have. This is therefore an area we will consider carefully and seek customer feedback on, as well as work with fellow train operators to establish a consistent approach across the network.

Whilst the best solution is still to be discussed and finalised, our key objective is to make sure that any customer who needs assistance to travel can quickly and easily find a member of staff in a set static location that is accessible for all. Many of our current ticket office locations do not have step free access and so a benefit of the proposals should be that staff will be more visible and available to customers who need them. We will work to make sure the mitigation action supports this and the delivery of assistance to older and disabled customers.

D34 & D50 Discounts

As detailed in our Accessible Travel Policy (ATP), GTR supports the industry-wide schemes for discounts for blind or visually impaired customers or customers who stay in their wheelchair during a rail journey, referred to as D34 / D50 in reference to the percentage discount on an adult fare.

These discounts are only currently available from ticket offices for wheelchair users & blind and visually impaired customers. Removal of ticket offices would clearly have an impact on the disabled customers who are entitled to these discounts and we are clear that there is a need for mitigation in this area. The next steps for these discounts are being discussed at an industry level (such as the future possible digitalisation of these discounts) but we will consider GTR level mitigating action should there be a delay in an industry solution for these discounts during implementation if the proposals are approved. In this circumstance, we would continue to comply with the commitment set out in our Accessible Travel Policy (ATP) that *"If disabled customers are unable to purchase a ticket at a station before they travel due to our facilities being unavailable, they can buy a ticket without penalty at their destination or from on-board staff (where available)."* We would make sure our approach supported this and that all customer facing staff were adequately briefed around this commitment to support its application.



TVM availability & accessibility

All GTR TVMs meet the standards within the DfT code of practice and cover different aspects of design standards at stations. Page 131 of this standard covers TVMs and there are also minimum height requirements for wheelchair access.

GTR have a fleet of TVMs that are card only however in each station these are mixed with cash & card TVMs at the same station. Only 3 stations do not have TVMs that accept cash.

The following is further information on our TVMs and mitigation activity.

- Should customers need assistance in using a TVM, this will be available within the proposed model to move staff out of the ticket office and situated on the concourse.
- The role of the station teams will continue to include maintenance of the TVMs to mitigate against them going out of service, plus fault reporting for any issues that they are not able to fix through established finger-tip maintenance processes.
- GTR will also continue to monitor TVM availability remotely and investigate any issues, as per current procedures
- GTR will continue to monitor faults reported by stations teams to ensure action by suppliers is timely and in line with contractual SLAs.
- GTR is investigating SLAs and new contractual opportunities to mitigate against stations having no TVMs in service (partially or fully functional).

As part of our gathering information for our station level EIAs we have been able to assess the numbers and locations of TVMs across affected stations. As a result, further reviews can be carried out on this data to ascertain if these stations have suitable ticketing facilities for all customers. Where any risks are identified we will be able to implement bespoke location specific mitigations. This will remain a critical live element for our station level EIAs to consider.

On conductor and onboard supervisor routes on our Southern network, a further mitigation will be the option to purchase a ticket during their journey from these members of staff.

Station Hubs

An element of the proposals is for station hubs with ticket office facilities to be opened on request in selected stations (as outlined in the consultation documents), which customers could travel to if the ticket type they wanted was only available from a ticket office. GTR retail information states that this only applies to 3% of ticket types and customers who had to travel to these stations would be reimbursed at the station hubs to make sure the journey did not cost them any additional amount.

As set out above in relation to D34 & D50 discounts, we are mindful of our ATP commitment that *"If disabled customers are unable to purchase a ticket at a station before they travel due to our facilities being unavailable, they can buy a ticket without penalty at their destination or from on-board staff (where available)."* and would not make any decisions that conflicted with this. We would therefore identify mitigation at a GTR level to make sure we satisfied our ATP commitment. This is also likely to be an issue affecting other train operators making similar proposals so we will encourage an industry wide discussion so that a consistent approach was adopted. However, the finalised



industry decision on the D34 & D50 discounts should mitigate much of the impact on disabled customers.

Station Help Points

Station Help Points already play an important role in supporting customers travelling on our network who need to contact a member of staff. They have been designed with accessible features such as large buttons and hearing induction loops. We have endeavoured to place these at suitable heights and in accessible locations but are aware that further optimisation of individual locations is possible. We have a range of sources of information that we can use to review these locations, such as the station level EIA and information gathered as part of these assessments and station maps, including usefulness of signage. This has helped capture any obvious places where mitigations are needed as part of these proposals to make sure customers can always contact a member of staff through these facilities or an appropriate alternative, such as our freephone number to our assisted travel team based in our Rail Operations Control (ROC) as it not likely to be possible to move existing Help Points. We will consider whether investment in additional Help Points could be a suitable mitigation for some stations affected by the proposals, as well as signage improvements. The station level EIAs will be invaluable in reviewing solutions on a station-by-station basis.

Checks of our Help Points are carried out as part of our service quality regime, which will support ongoing maintenance and fault reporting of these facilities. Our accessibility mystery shopping programme also helps us assess the quality of communication and assistance customers receive through Help Points on our stations, which will inform ongoing training and resource needs.

Lastly, we will be considering potential options for refreshing labelling on our Help Points to make it as inclusive as possible and indicate to customers which button to press for assistance (currently labelled “assistance/emergency” with temporary stickers on Help Points on some of our routes).

Stations with proposed reduced station staffing hours

We have a mixture of staffing models and station opening hours across our network. The majority of stations covered by the proposals will remain staffed for the same hours as they currently are but by multi-skilled staff. However, there are some stations within the proposal that have a reduction in station staffing hours. The reduction in staffing hours is small in most cases and only a small proportion of stations included within the proposals are affected. We have existing support mechanisms in place to cover the hours these stations would become unstaffed. For instance, the affected stations on our Southern coastway routes have a member of onboard staff on every train calling there who can provide assistance and sell tickets. In other parts of our network we have established mobile assistance teams that can offer assistance.

As is the case now, there is always a way for customers to contact a member of staff when stations are unstaffed, such as through a station Help Point or our freephone number. These mechanisms will continue to support both turn up and go and booked assistance as these stations.



Hearing induction loops

Many of our ticket offices are fitted with hearing induction loop facilities to support hard of hearing customers when speaking to staff through the ticket office window. The removal of this window and having staff available in the concourse will support better communication and support. However, we recognise that stations can be noisy busy environments and want to make sure the potential removal of induction loop facilities does not create a barrier to customers who rely on them. We will actively seek feedback from customers with lived experience and groups representing people who are hard of hearing to find and implement suitable mitigations, which could include new innovations.

We will also support colleague awareness internally through training and engagement on potential communication barriers and how to support all customers.

Access to station facilities

We are committed to maintaining the same level of access to station facilities at stations affected by the proposals as is currently available. To mitigate the impact the proposals could have on the availability of station facilities such as accessible toilets, we will identify an appropriate member of staff who will be responsible for making these facilities available to customers to the same extent as they are under the current station staffing hours. This could be another member of station staff, mobile assistance team staff or other member of staff as appropriate for this station.

The station level EIAs will support the design of the exact solution for each station affected to make sure that customers are not impacted by changes made under the proposals if they are implemented.

We are confident in the maintenance and fault reporting processes we currently have in place, with a range of checks being undertaken on regular frequencies. We will however keep this under review for all stations impacted by the proposals, particularly those with station lifts, to make sure we have considered any potential negative impacts and act to take mitigations if needed.

Accessible toilet emergency alarms connected to ticket offices

We are aware that some emergency alarms from accessible toilets at stations sound in ticket offices. Work is underway as a priority to confirm which stations are impacted and to identify a suitable mitigation strategy. This will be undertaken in conjunction with safety and facilities teams.

Station car parking – non-digital support

We have identified a potential area customers may need support, particularly those that do not have access to or confidence in digital options. Whilst most customers pay for their parking at our station car parks digitally, tickets can also be purchased at TVMs at relevant stations and staff may need to assist customers with this in some cases. We will therefore be including this within our training programme for the new multi-skilled station role.



This is not an exhaustive list of areas for mitigations under the proposals, and additional examples may be included in this assessment throughout the time these proposals are live, and through the implementation period if they are approved. Any final assessments and decisions (including station level EIAs) will be formed following engagement with customers and stakeholder groups to make sure we achieve the best outcome that supports customers through this time of change should the proposals be approved. In this circumstance, a detailed plan would be created to support the transition period and customer feedback and accessibility would play a pivotal role in this.

