

Rt Hon. Grant Shapps MP, Secretary of State.
Department for Transport
Great Minster House
33 Horseferry Rd
London SW1P 4DR

9th August 2022

Dear Secretary of State,

We write as organisations representing the 14.1 million disabled people in the UK, to set out our significant concerns regarding the proposed closure of rail ticket offices, and our objections to the engagement and consultation process that has been undertaken.

Around 1 in 5 people (20%) in the UK are disabled peopleⁱ. Everyone should have the right to travel with freedom, confidence, and spontaneity, but for disabled people getting from A to B involves facing barriers at every stage of the journey. From poor physical infrastructure to issues with communication and information, attitudes and systemic processes, and financial barriers.

This has resulted in the disability transport gap: disabled people make almost 30% fewer trips per year than non-disabled peopleⁱⁱ, a figure which has not changed for over twenty yearsⁱⁱⁱ.

We are disheartened to hear of reported plans to close rail station ticket offices in England. Taking away staffed ticket offices will have a practical impact on disabled people's ability to purchase tickets, arrange assistance and travel by rail, and an emotional impact on whether their journeys can be conducted reliably and safely. Public transport is vital to tackling the climate emergency, and at a time when rail companies want to encourage people out of their cars and onto trains this is a clear step backwards.

In the accompanying pages to this letter, we have set out our three main areas of concern regarding the impact this policy will have on disabled people. We hope that your reply will address these issues, and that you will agree to a pause on the ticket office closures. The impact on disabled people must then be fully researched and documented, followed by either testing of guaranteed mitigations or the plans being cancelled.

Yours sincerely,



Purchasing tickets

Currently, 1 in 8 rail tickets (12.5%) are sold over the counter at ticket offices. This is a significant number of people who will be severely impacted should ticket offices be closed.

Closing ticket offices will force passengers to use alternative means to purchase tickets; either through booking online or using the Ticket Vending Machines (TVMs) at the station. For some disabled people, neither of these options are accessible.

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^{iv}. Blind and visually impaired people are especially likely to be digitally excluded; roughly 38% of all blind and partially sighted people in the UK have never used the internet or have no internet access^v. For those who do have access to the internet, the ticket purchasing platforms themselves can be inaccessible, particularly for those using screen-reader technology or using a keyboard (mouseless). Older people also are less likely to use the internet; across England, 42% of people over the age of 75 report not using the internet at all^{vi}.

Furthermore, the payment methods supported through both online platforms and at TVMs create barriers for the un-banked and those who use cash for accessibility reasons. Disabled people face barriers to holding a bank account, particularly those who are learning disabled and those living in institutional settings. The closure of bank branches and other barriers such as communication barriers^{vii} further create financial exclusion for disabled people. Many TVMs do not accept cash.

Some concessions and ticket types that disabled people use to travel are not available from some TVMs. For example, the 50% wheelchair user discount can only be purchased at ticket offices. Using TVMs may therefore result in increased costs of travel for many disabled people, who already face significant financial barriers to transport. On average, a disabled person faces over £583 more monthly costs than a non-disabled person^{viii}. Disabled people are more over a third less likely to be employed as non-disabled people^{ix}. The proportion of working age disabled people living in poverty (after housing costs) is 27% - 8% higher than the figure for working age non-disabled people^x.

Additional barriers disabled people face to using TVMs include the lack of tactile information and functionality, the positioning (e.g. being out of reach for a wheelchair user), and the complexity of information and user experience.

In recent years there has been a push towards a smart ticketing model, as outlined in several recent consultations and demonstrated with the recent £360 million investment^{xi} to roll out contactless pay-as-you-go ticketing across the Midlands and North. While this provides some solutions in principle, the infrastructure in place is not yet accessible. We have concerns about how visually impaired passengers will locate and use smartcard readers, how accessible the methods of adding credit to smartcards are, how correct discounts and concessions will be applied, and what safeguards are in place for those who forget to tap in or out to avoid getting charged disproportionate penalties.

Station staffing

Currently, many staffed stations are single-staffed in the ticket office only. Should ticket offices be closed or have hours reduced, there will be a reduction in staffing levels at stations. This threatens the provision of the assistance, as well as the availability of facilities including accessible toilets, heated waiting rooms and lifts, which are often closed while stations are unstaffed (or are accessed via keys that only staff can provide).

Many disabled people rely upon assistance from staff in order to make their journey, and staff at ticket offices act as the first point of contact. For people with mobility impairments, staff are required to assist with getting onto and off the train. Blind and visually impaired passengers require staff to sight-guide them through the station, onto the platform safely, or may need support with purchasing tickets. Neurodivergent people or those with mental health conditions may require staff assistance to support with navigating through a crowd or through a high sensory environment. People living with dementia report they 'get very confused with technology' and much prefer face to face support to ask what platform they need and what time the train is leaving^{xii}. Whatever a person's specific access requirements, it is vital that disabled passengers can trust that staff will be on hand and assistance will be provided.

Without staffed ticket offices, disabled people must rely upon finding the Help Point to request assistance, which are often not clearly signposted, or not working, and are inaccessible to many Deaf people. A reduction in staff risks leaving disabled people stranded in stations without assistance. Replacing ticket office staff with 'roving' / 'floating' staff who would move around the station rather than remain stationed in the office is not an adequate solution and creates further barriers; people with energy-limiting impairments or mobility impairments cannot trek around stations to find assistance, and blind and visually impaired people will struggle to find and recognise a staff member.

It must be noted that this will be a worsening of an already poor situation. In the recent report^{xiii} commissioned by the Office of Rail and Road into Accessible Travel Policy Implementation, 79 disabled auditors were asked to request assistance from a Help Point at an unstaffed/partially staffed station. Only 65 auditors were able to find a Help Point that they could access. Of these 65; 53 auditors attempted Help Point calls, of which 46 were connected to a Help Point operator; resulting in advice and assistance that enabled 41 auditors to successfully board a train. That equates to **just a 51% success rate for disabled people using Help Points to successfully receive assistance**^{xiv}.

The impact of this cannot be overstated. Disabled people already face the onerous process of meticulously planning journeys in advance. Turning up at a station expecting to be able to request assistance only to find yourself deserted can put disabled people off from attempting journeys again in the future, and can be a real barrier to travelling. According to Scope^{xv}, nearly a third of disabled train passengers said that they don't trust their journeys will go as planned. Closing ticket offices and cutting staff will only make this worse.

Personal security

In London TravelWatch's recent research on personal security^{xvi}, it was found that visible staff at stations made women and other groups of people – including disabled women/people – feel safer when travelling. Passengers, particularly women and young people, reported that in the absence of staff they wouldn't know how to get help in the event of a crime or incident.

Staffed station ticket offices are currently guaranteed places where people can get help. Without sufficient visible staff at stations, there's a risk that particular groups of people with protected characteristics (who face a higher incidence of harassment and hate crime) will not feel safe while travelling on the rail network, and will opt to avoid travelling altogether.

Engagement, consultation and process

Finally, we would like to express our concerns at the process behind this policy. The Department for Transport consulted with the Disabled Persons Transport Advisory Committee (DPTAC) before amending Ticketing and Settlement Agreement (TSA) Ticket Office Guidance. However, this was a closed – not public – consultation. It is unclear what concerns DPTAC raised regarding these changes or how those concerns have been addressed, as a report on the consultation has not been published. Our organisations were not able to provide comment or feed into this consultation. Given the size and scale of the proposed changes, with such profound impacts on disabled people, it is staggering that disabled people themselves and the organisations representing them have not had any opportunity to meaningfully engage with and influence the policy.

We are concerned that in filing an application to close a ticket office, Train Operating Companies may put forward a proposal that does not allow for meeting the Passenger Assist 2-hour requirement, nor their ability to maintain a Turn Up and Go service. We do not believe there is any suitable alternative arrangement adequate to make up for a lack of Passenger Assistance and Turn Up and Go; it is vital disabled passengers are able to travel confidently and spontaneously. While we understand applications to close individual ticket offices will go to public consultation, we do not believe this process to be inclusive and accessible, and we worry about a lack of consistency and joined up approach, and that it will not consider cumulative impacts.

It is a time of great uncertainty for disabled people, dealing with the twin effects of the pandemic and the cost-of-living crisis, and their ongoing impact on travel. With the total lack of clarity and transparency on these proposals, disabled people have had to rely upon rumours and hearsay as reported in the press. This has damaged confidence in travel and has left disabled people feeling anxious about the future and what assistance they can expect. We urge the Department for Transport to clarify these issues urgently.

Signatures

Katie Pennick, Campaigns and Policy Manager – **Transport for All**

Pip Jackson, President – **Access Association**

Fran Springfield & Kathy Bole, Co-Chairs – **Chronic Illness Inclusion**

Stephen Brookes MBE, Rail Policy Adviser – **Disability Rights UK**

Blanche Shackleton, Head of Policy Public Affairs and Campaigns – **Guide Dogs**

Gemma Hope, Director of Policy – **Leonard Cheshire**

Nick Moberly, CEO – **MS Society**

Sophie Dodgeon, Head of Policy and Public Affairs – **RNIB**

Teri Devine, Associate Director for Inclusion – **RNID**

Amanda Casson Webb and Sue Evans, Joint Chief Executives – **Royal Association for Deaf people**

James Taylor, Executive Director of Strategy, Impact and Social Change – **Scope**

Eleanor Lisney – **Sisters of Frida**

Tom Jones, Campaigns Officer – **Thomas Pocklington Trust**

Claire Glasman – **WinVisible**

Isabelle Clement MBE, Director – **Wheels for Wellbeing**

References

- ⁱ UK Government (2021) Family Resources Survey: financial year 2019 to 2020. Available at <https://www.gov.uk/government/statistics/family-resources-survey-financial-year-2019-to-2020/family-resources-survey-financial-year-2019-to-2020#disability-1>
- ⁱⁱ Department for Transport (2020) National Travel Survey: DIS0401 Travel by disability status and age: England 2020. Available at <https://www.gov.uk/government/statistical-data-sets/transport-disability-and-accessibility-data-tables-dis04>
- ⁱⁱⁱ In 2001 the Commission for Integrated Transport (CfIT) conducted a survey that found that disabled people travel a third less often than non-disabled people. The CfIT study was conducted by MORI between 9 June and 5 July 2001 among 2,202 members of the general public in England. Referenced in DPTAC (2002) Attitudes of Disabled People to Public Transport. Available at https://trimis.ec.europa.eu/sites/default/files/project/documents/20060811_110503_45123_UG395_Final_Report.pdf
- ^{iv} Office for National Statistics (2019). Exploring the UK's digital divide. Available at: <https://tinyurl.com/2p92bfbp>
- ^v RNIB (2021) Sight loss and technology briefing. Available at <https://www.rnib.org.uk/sites/default/files/APDF%20Sight%20Loss%20and%20Technology%20Briefing.pdf>
- ^{vi} ELSA Covid-19 Substudy Wave 1, 2020
- ^{vii} Which (2021). Available at <https://www.which.co.uk/news/2021/07/banks-failing-to-support-disabled-customers/>
- ^{viii} Scope (2019) Disability Price Tag report. Available at: <https://www.scope.org.uk/campaigns/extra-costs/disability-price-tag/>
- ^{ix} Office for National Statistics (2019) Disability and employment, UK: 2019. Available at <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandemploymentuk/2019>
- ^x Scope (2022) Disability facts and figures. Available at <https://www.scope.org.uk/media/disability-facts-figures/>
- ^{xi} Government (2021). £360 million investment to transform rail ticketing across the country. Available at <https://www.gov.uk/government/news/360-million-investment-to-transform-rail-ticketing-across-the-country>
- ^{xii} Qualitative research conducted and provided by Alzheimer's Society.
- ^{xiii} RiDC (2022) Accessible Travel Policy Implementation. Available at <https://www.orr.gov.uk/sites/default/files/2022-07/accessible-travel-policy-implementation-review-july-2022.pdf>
- ^{xiv} Furthermore, in the same study, of the auditors who used a Help Point, 19% agreed/strongly agreed that the Help Point operator didn't understand their requirements. 14% agreed/strongly agreed that the Help Point operator was dismissive and the auditor didn't feel like a priority.
- ^{xv} Scope (2019) Travel Fair report. Available at <https://www.scope.org.uk/campaigns/travel-fair/travel-fair-report-summary/>
- ^{xvi} London TravelWatch (2021) Personal Security on London's Transport Network. Available at <https://www.londontravelwatch.org.uk/campaigns/personal-security/>