



DRAFT West Midlands Trains Equality Impact Assessment (EqIA)

Project title: Reform of ticket offices

Project owner	Head of Stations	Department	Customer Experience
Version number	V1.0	Date	29/06/23

Note: This is a working document which will continue to be developed during and post consultation.

Overview of Project

West Midlands Trains (London Northwestern Railway and West Midlands Railway) is proposing changes to the provision of ticket retailing and customer service at stations.

As customers move to alternative, more convenient ways of buying tickets, most tickets are now purchased either online or through ticket vending machines (TVMs). In the mid-1990s 82% of all tickets were sold at ticket offices nationally, compared to just 12% today.

For West Midlands Trains, ticket offices accounted for 52% of sales in 2009, but account for only 10% in 2023.



West
Midlands
Trains

In response to these changing customer habits, alongside other train operators, we are proposing to bring employees out from behind ticket office windows to be closer to customers, providing an enhanced customer service and greater visibility of staff on concourses and platforms.

Over 40% of our stations are already unstaffed and many of our ticket offices are only staffed on a part-time basis.



Our Proposal

We are proposing to bring staff out from behind the glass, freeing them up to support customers directly and with greater flexibility. We want staff to be more visible on concourses and platforms and closer to customers to provide an enhanced service role.

Our new model will include:

- A centralised customer experience team to monitor stations remotely and deploy support as required.
- A mobile, multi-skilled team covering several stations and a range of duties to support customers who will also be deployed to locations where extra support is required.
- Customer Information Centres at 10 stations with staff available throughout the week to assist with ticket purchases, as well as customer service, passenger assistance, safety and general upkeep duties.

A full range of ticketing facilities will be offered at Customer Information Centre's to provide customers travelling from, to, or through those stations with the ability to fulfil certain transactions if they are unable to use alternatives or these have not yet been delivered.

Changes will be delivered in conjunction with a national plan to simplify and modernise railway ticketing.

Under the proposals, stations that are currently unstaffed will have a staff presence, unlike today.



**West
Midlands
Trains**

TVMs will be upgraded to make sure customers can still buy the most popular tickets at stations and many staff will have hand-held devices. New customer help points will also be introduced at stations as part of the proposals. The proposals do not impact the availability of other station facilities such as toilets and waiting rooms.

We will continue to meet our accessible travel policy requirements as approved by the ORR. Booked and un-booked passenger assistance with boarding and alighting trains will continue to be provided by our senior conductors who are on every train.

Not all ticket office staff currently deliver passenger assistance. Our proposed new mobile teams will offer greater flexibility and additional support in providing customer assistance.



Key elements of the proposal:

- 77 of our ticket offices would close and be staffed flexibly by a new multi-skilled mobile team who will be deployed to groups of stations in areas rather than being based at individual stations.
- 10 stations will have a customer information centre with ticket office facilities. These customer information centres will sell a full range of products, as well as providing help with more complex transactions.
- Ticket office and station service staff would be given the opportunity to re-train to undertake a range of customer service and station upkeep duties.
- A national consultation is taking place between 5 July and 1 September 2023, following the extension of the consultation period, which was initially due to close on 26 July. Feedback is being managed centrally by two independent watchdogs, Transport Focus and London TravelWatch. Following the conclusion of the consultation; responses will be reviewed which will inform decisions upon whether the proposals should be implemented, amended or not proceed.
- Detail of proposed changes by station are available at:

[Proposed changes to ticket offices | LNR | London Northwestern Railway](#) and [Proposed changes to ticket offices | West Midlands Railway](#)

Equality Impact Assessment Approach

Separate EqlAs have been conducted for all of the 149 stations on the WMT network, that are currently staffed and unstaffed. Station and location specific data has been used to understand, local demographics, relevant to the 9 protected characteristics



as well as crime data. This approach recognises that each of these stations is unique, and allows for proper consideration of issues, risks and mitigations at the local level.

What sort of work is this?

	Property-related, or physical changes, to stations, trains, offices, depots or other buildings / assets managed by WMT		
	An event, including conferences, training courses, meetings etc...		
	The change, removal or introduction of a policy or standard.		
	An IT development or enhancement		
	The procurement of goods and/or services		
	<table border="1"> <tr> <td>The introduction of another sort of change – <i>please explain</i></td> <td>This EqIA focus on the changes brought about as a result of the reduction to staffing levels of stations across the West Midlands Trains Network that includes the removal of traditional ticket offices, reviewing legacy dispatch locations and the creation of new multi-functional roles. As a result of this, the service offering to West Midlands Trains Customers will change.</td> </tr> </table>	The introduction of another sort of change – <i>please explain</i>	This EqIA focus on the changes brought about as a result of the reduction to staffing levels of stations across the West Midlands Trains Network that includes the removal of traditional ticket offices, reviewing legacy dispatch locations and the creation of new multi-functional roles. As a result of this, the service offering to West Midlands Trains Customers will change.
The introduction of another sort of change – <i>please explain</i>	This EqIA focus on the changes brought about as a result of the reduction to staffing levels of stations across the West Midlands Trains Network that includes the removal of traditional ticket offices, reviewing legacy dispatch locations and the creation of new multi-functional roles. As a result of this, the service offering to West Midlands Trains Customers will change.		

1. What does this work aim to achieve?



**West
Midlands
Trains**

- To deliver an efficient, effective and flexible station operation reflecting current consumer behaviours.
- Ensuring required cost savings are realised but a good quality customer experience is maintained.
- Modernise the approach to customer service, retailing and management of the station operation across the WMT Network with multifunctional mobile teams.
- Deliver a consistent approach to the staffing of stations across the network with some currently unstaffed locations now benefitting from having a staffing presence at various points across the day/week, in line with customer movements and/or special events.

2. Could this work impact on people?

West Midlands Trains Ltd.

Registered address: St Andrews House, 20 St Andrew Street, London, EC4A 3AG. Registered number:9860466. VAT number: 278 2688 49.
West Midlands Trains Ltd is owned by Transport UK Group Ltd (TUK).



✓	Yes – please explain how	<p>This work will impact on:</p> <p>Customers – It will change the WMT staff interaction and service that they will encounter at each station.</p> <p>The customer experience will be different as a result of a change to the role that each staff member is undertaking. Moving away from singular presence (i.e. ticket office, gate line, platforms) at a single location to a versatile, multifunctional role responsible for the customer service offering across a number of different locations on the network.</p> <p>Some stations that are currently staffed will be covered by the mobile teams, and legacy unstaffed locations will be covered by the mobile teams.</p> <p>The overall number of ‘station’ staff will be reduced.</p>
	No	N/A



3. What do you know about the diversity of the people potentially impacted by this work? Where does this information originate from?

This detail should be proportional to the size and scope of your project.

Each EqIA uses a range of data and evidence including local area information and demographic data – age, ethnicity, first language preference, religion, disability, crime, educational/ medical/ religious establishments, major employers, charitable organisations, and any seasonal data trends.

We looked at the following:

- Within the local population, are the following four age groups (<4 – 15, 16 – 24, 25 – 64, 65+) within 5% of the regional or national average?
- Are local ethnic group demographics within 5% of the regional and national average?
- Is “English as spoken a first language” within 5% of the regional and national average?
- Is the number of people within the local population who identify as following “no religion” within 5% of the regional and national average?
- Are people who are recognised as disabled under the equality act in the local area (where this limits their daily activities a little, or a lot) within 5% of the regional and national average?
- Does this data align with local/corporate knowledge?
- What are the top three crimes in the local area?
- Is the number of crimes reported in the local area below, equal to or above the national average?



4. What protected characteristics could this work potentially have an impact on and what is the potential impact?

Protected Characteristic	Potential negative impacts	Potential positive impacts
Disability	<ul style="list-style-type: none">• Perception that customers requiring physical assistance (including, but not limited to, people in wheelchairs, neurodiverse, visually impaired) will not be offered support to board or alight the train. While this is not the case, if for any reason we were unable to deliver assistance, we would provide alternative accessible transport, as is the case today.	<ul style="list-style-type: none">• Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment.• There is potential for improved self-service access to the railway as a result of reduced interaction with staff members throughout the station environment. There is further



	<ul style="list-style-type: none">• Reduced access to information e.g. visually impaired people, will not be able to read signage at the location, and there will be fewer staff available at the location in order to assist.• Reduced access to retailing of tickets e.g. visually impaired person will not be able to purchase a ticket from the ticket office.• Concerns over reduced access to toilet facilities.• Concerns over reduced access to enclosed waiting facilities.• Reduced staff presence resulting in less support for people through the	<p>potential for improved direct access to facilities e.g. toilets, waiting rooms.</p>
--	---	--



	station environment.	
Age	<ul style="list-style-type: none"> • Reduction in staffing levels and removal of ticket office may deter some older customers from purchasing tickets who are used to the legacy approach of station staffing e.g. being used to speaking to a person in the ticket office, and most likely to utilise this in order to purchase tickets. • Reduction in staffing levels and removal of ticket office may deter some older customers from travelling by train, due to concern for personal safety 	<ul style="list-style-type: none"> • Mobile teams, subject to their daily deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment. • Station staff will not be fixed to one location or be behind the ticket office window. They will be out alongside the customers increasing potential reach of customer support leading to more consistent visibility of staff across the network.



	<p>and perception of personal safety.</p> <ul style="list-style-type: none"> • Some younger customers may feel uneasy about travelling from an unstaffed location due to lack of familiarity with the railway. This may act as a deterrent to travel. • Elderly people may be less proficient with technology e.g. apps, mobile phones, TVMs, Help Points. 	<ul style="list-style-type: none"> • There will be improved self-service access to the railway as a result of reducing interaction with staff members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.
<p>Pregnancy / maternity</p>	<ul style="list-style-type: none"> • Reduction in staffing levels may lead to concerns about reduced access to enclosed waiting areas, toilets and baby changing facilities. 	<ul style="list-style-type: none"> • Improved and consistent access to the station facilities (e.g. toilets, enclosed waiting rooms, baby changing facilities) will be provided remotely.



	<ul style="list-style-type: none">• Reduction in staffing levels may lead to concerns that access to enclosed waiting areas / toilets will reduce options for breast feeding in a safe environment.• Reduction in staffing levels may lead to concerns that customers requiring physical assistance will not be offered support to board, alight or navigate through the station environment.• Reduction in staffing levels may deter some pregnant customers or new parents from travelling by train, due to concern for personal safety	<ul style="list-style-type: none">• Mobile teams, subject to their daily deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment.
--	---	---



	and perception of personal safety.	
Race	<ul style="list-style-type: none"> • Reduced access to information (e.g. for those whose first language is not English) will not be able to read signage at the location, and there will be fewer staff available at the location in order to assist. • Reduction in staffing levels and removal of ticket office may deter some people from travelling by train, due to concern for personal safety and perception of personal safety. • Reduction in staffing levels and removal of ticket office may reduce access to ticketing 	<ul style="list-style-type: none"> • Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment. • There will be improved self-service access to the railway as a result of reduced interaction with staff members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.



	<p>advice or being able to purchase tickets e.g. where current ticket office staff use different tools to provide information in accessible formats, such as using online translators.</p>	
Religion or belief	<ul style="list-style-type: none">• Reduction in staffing levels may lead to concerns about reduced access to enclosed waiting rooms for prayer facilities and toilet/washing facilities.• Reduction in staffing levels and removal of ticket office may deter some people from travelling by train, due to concern for personal safety	<ul style="list-style-type: none">• Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment.• Improved and consistent access to the station facilities (e.g. toilets, enclosed waiting



	<p>and perception of personal safety.</p>	<p>rooms) will be provided remotely.</p> <ul style="list-style-type: none"> • There will be improved self-service access to the railway as a result of reduced interaction with staff members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.
<p>Gender</p>	<ul style="list-style-type: none"> • Reduction in staffing levels and removal of ticket office may deter some people from travelling by train, due to concern for personal safety and perception of personal safety. 	<ul style="list-style-type: none"> • Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment.



		<ul style="list-style-type: none"> • There will be improved self-service access to the railway as a result of reduced interaction with staff members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.
<p>Sexual orientation</p>	<ul style="list-style-type: none"> • Reduction in staffing levels and removal of ticket office may deter some people from travelling by train due to concern for personal safety and perception of personal safety. 	<ul style="list-style-type: none"> • Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment. • There will be improved self-



		<p>service access to the railway as a result of reduced interaction with staff members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.</p>
<p>Marriage/civil partnership</p>	<ul style="list-style-type: none"> • Reduction in staffing levels and removal of ticket office may deter some people from travelling by train, due to concern for personal safety and perception of personal safety. 	<ul style="list-style-type: none"> • Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment. • There will be improved self-service access to the railway as a



		<p>result of reduced interaction with staff members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.</p>
Gender reassignment	<ul style="list-style-type: none">• Reduction in staffing levels and removal of ticket office may deter some people from travelling by train, due to concern for personal safety and perception of personal safety.	<ul style="list-style-type: none">• Mobile teams, subject to their deployment plan / roster, will cover all locations. This will lead to an increased likelihood of staff availability throughout the day to support customers through the station environment.• There will be improved self-service access to the railway as a result of reduced interaction with staff



		<p>members throughout the station environment. There is opportunity for improved direct access to facilities e.g. toilets, waiting rooms.</p>
--	--	---

5. What could you do to ensure this work has a positive impact on diversity and inclusion?

- As part of the assessment, we have identified mitigations to ensure that the impact on diversity and inclusion is not adversely affected.
- The EqIA is a living document and process through which we will record and review the impact of any change, identifying any opportunities for immobile diversity and inclusion.
- There is a formal consultation period as part of the change programme, but we will also maintain an on-going dialogue with stakeholders in order to ensure that any issues or concerns can be raised and addressed.

6. What consultation have you done with those who share protected characteristics about this work? What issues were raised?

Who was consulted	Protected characteristic represented	How was the	Issues raised
--------------------------	---	--------------------	----------------------



		consultation carried out	
Rail User Groups	Age, disability	Briefing and Q&A sessions over Teams	<p>Perception that toilet and waiting facilities won't be available.</p> <p>Quality of existing TVMs and availability of tickets.</p> <p>Concerns for older people who cannot or do not want to use digital technology.</p> <p>Concerns about potential increases anti-social behaviour and/or crime.</p>
WMT Stakeholder Equality Group	Disability (the group represents a range of physical and non-physical disabilities and those who are neurodiverse).	<p>Briefing and Q&A held on Teams</p> <p>In person 1:1 meetings.</p>	<p>Ticket offices do not just sell tickets. They are a safe space for people with disabilities.</p> <p>Concerns over where to find staff from the mobile team</p>



			<p>when they are at the station (could be on a platform or concourse, whereas a ticket office member of staff is static).</p> <p>Difficulties using TVMs.</p> <p>Concern about how quickly the mobile team could be deployed to a station/distance from customer information centre.</p> <p>Concerns over the usability of existing help points, especially for those with speech or hearing impairments.</p>
MPs and local authorities	All	Briefing and Q&A held on Teams	Concerns about reduced staffing hours for non-customer



			<p>information centres.</p> <p>Potential increase in ASB/crime.</p> <p>Concerns about assistance navigating and moving around the station.</p> <p>Concern about what happens if lifts are out of order at a station served by the mobile team.</p>
Community Rail Partnerships	All	Briefing and Q&A held on Teams	<p>Concerns about access to toilet and waiting room facilities when staff are not at the station.</p> <p>Concerns about general upkeep of the station.</p>

**7. Who else have you consulted with about this work?
What issues were raised?**



Who was consulted	Internal to WMT or external stakeholder?	How was the consultation carried out?	Issues raised
WMT Working Group	Internal	Workshop	<ul style="list-style-type: none">• Perception that customers requiring physical assistance (including, but not limited to, people in wheelchairs, neurodiverse, visually impaired) will not be offered support to board or alight the train.• Reduced access to information e.g. visually impaired people, will not be able to read signage



			<p>at the location, and there will be fewer staff available at the location in order to assist.</p> <ul style="list-style-type: none">• Reduced access to retailing of tickets e.g. visually impaired person will not be able to purchase a ticket from the ticket office.• Concerns over reduced access to toilet facilities.• Concerns over reduced access to enclosed waiting facilities.
--	--	--	--



			<ul style="list-style-type: none"> • Reduced staff presence resulting in less support for people through the station environment.
--	--	--	--

8. Based on the issues raised by this Equality Impact Assessment, how are you going to proceed?

✓	Change the work to mitigate against potential negative impacts found – <i>please outline any changes that will be made</i>	See below
	Justify and continue the work despite negative impacts – <i>please provide the justification</i>	
	Continue the work because no potential negative impacts found	
	Stop the work because discrimination is unjustifiable and there are no obvious ways to mitigate this	



Change the work to mitigate against potential negative impacts found	Disability	Age	Pregnancy /	Race	Religion / belief	Gender	Sexual orientation	Marriage / civil	Gender reassignment
The senior conductor on every train will provide assistance alighting and boarding all WMT services (as is currently the case).	✓	✓	✓						
Improved and consistent access to the station facilities (eg. toilets, enclosed waiting rooms for breast feeding, prayer) will be provided remotely.	✓	✓	✓	✓			✓		✓
The majority of tickets can be purchased on line prior to the journey, via the ticket vending machine (TVM) or on the train via the Senior Conductor.	✓	✓							
New improved digital help points are already being	✓	✓	✓	✓	✓	✓	✓	✓	✓



rolled out across our stations estate.									
The interactive help points will be able to give relevant information for the journey – next train, journey time, destination information, features have been selected and driven by a previous EqlA for the Help Points. New help points have the functionality to receive and give audible and visual information in various languages.	✓	✓	✓	✓	✓	✓	✓	✓	✓
The interactive help points which includes provision of an emergency button which will contact the emergency services.	✓	✓	✓	✓	✓	✓	✓	✓	✓
Ability to change the language settings on TVMs and online apps.				✓					



Proposed rostering of mobile team is aligned with periods of peak customer demand, booked assistance, events and planned disruption.	✓	✓	✓	✓	✓	✓	✓	✓	✓
Passenger Assistance data will be monitored for each station and the deployment of the mobile team will adapt as required.	✓								
A customer communications campaign would reassure customers that if they do not purchase a ticket prior to boarding due to not being able to use a TVM, they will not receive a penalty fare if they buy from the senior conductor.	✓	✓	✓	✓	✓	✓	✓	✓	✓
To enable the mobile team to attend a station where help has been requested	✓	✓	✓	✓	✓	✓	✓	✓	✓



within a reasonable timeframe, we plan to provide pool cars. The proposed customer information centres are strategically placed across the network to aid travel to all stations on a line of route.									
We will continue to work with the wider industry on the roll out and development of the Passenger Assist App as quickly as possible.	✓								
We intend to identify clear locations at each station where staff can be found while at the station.	✓	✓	✓	✓	✓	✓	✓	✓	✓
CCTV is already being upgraded across our stations estate.	✓	✓	✓	✓	✓	✓	✓	✓	✓
We will work with the wider industry on the rollout of 'Project Oval' –	✓	✓	✓	✓	✓	✓	✓	✓	✓



<p>contactless payment across the South East of England, which will further mitigate against the need to buy tickets. Although this only currently applies to a small number of locations on the London Northwestern Railway network and delivery is likely to be 2024/25.</p>									
--	--	--	--	--	--	--	--	--	--

9. What specific actions will be undertaken as a result of this diversity impact assessment?

Action
<p>Re-assess the Help Point Roll Out Programme in view of timings for delivery.</p>
<p>Clarify internal operational standards associated to fulfilment of customer assistance boarding and alighting services by Senior Conductors.</p>
<p>Review the WMT approach to station signage.</p>
<p>Utilise the information contained within EqIA to inform the WMT approach to staff deployment.</p>
<p>Utilise the information contained within EqIA to inform the WMT training content for frontline teams.</p>



**West
Midlands
Trains**

Continue to engage stakeholders and relevant groups as the proposals develop to ensure views are represented and where needed, further mitigations are identified.