MARLOW - MAIDENHEAD PASSENGERS' ASSOCIATION

Office of Rail Regulation – Code of Practice on Retail Information Consultation

Via email ORRretailcode@orr.gsi.gov.uk

To whom it may concern:

I'm responding to your Retail Code Consultation dated September 2014 on behalf of the Marlow-Maidenhead Passengers' Association (MMPA). We were founded in 1971 as a rail user group in the Thames Valley working for the benefit of travelers and communities in the area served by the branch railway between Marlow (Wycombe District, Bucks CC) and Maidenhead (Royal Borough of Windsor & Maidenhead). Since summer 2013 we also support rail users at Taplow station (South Bucks District, Bucks CC) The Marlow Branch serves a catchment area with an estimated population of around 100,000 people and it is a well-used part of the railway, accounting for around 900,000 passenger journeys annually. Taplow station accounts for around 240,000 passenger journeys annually. We also hold a watching brief for High Wycombe station which was connected to the Marlow Branch until 1970. We also support the Twyford Village Partnership (TVP) in their overview of their station.

The views expressed here were assembled from the 12 person committee elected to represent our members, many of whom have long experience representing passengers on the committee and previous professional roles in the rail or public transport industries. Thank-you for the opportunity to provide input into this process.

Susan Morrison
Chairman
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**RESPONSE TO OFFICE OF RAIL REGULATION RETAIL INFORMATION CODE
CONSULTATION**
September 2014

Responses to Questions in the Consultation Document

1. Given the requirements of consumer law and industry specific obligations, do you agree that the that the types of information highlighted above and in the associated Annex B are the types of information that passengers need when choosing, buying and using rail tickets?

We agree the types of information highlighted in the document are among those needed by passengers when choosing, buying and using rail tickets, including:

- Departure and arrival times
- Journey duration
- Ticket type
- Travel time restrictions
- Valid routes of travel
- Rights and Criteria for refunds and compensation
- Rules on breaking a journey
- Rules on duplicate season tickets
- Terms & Conditions (National Rail Conditions of Carriage and ticket specific)
- Assistance for passengers with disabilities
- Availability of on-train services such as Wi-Fi and catering
- Ability to travel with luggage or a bike
- Range of tickets available at that point of sale

Of course not all these types of information are of equal importance to all travelers at all times. The challenge is to find the right balance between making the relevant information easily available to those travelers requiring it exactly when they need it, without complicating the process by overloading them with bits that aren't relevant to them at that point in the transaction.

2. Are there other types of information that should be covered by the code?

Yes we believe there are other types of information the passengers need when choosing, buying and using rail tickets. These include:

- ***Information about availability and price of parking at stations*** - In some cases the price of parking may equal the price of the rail ticket. Since rail fares are regulated but car park fees are not, these fees have become an important source of revenue for TOCs, are often raised with very little notice, and can add significantly to the total cost of a rail journey. Increasingly there are peak and off-peak parking rates which do not correspond to similarly labelled rail tickets. It's possible to buy "off-peak" rail tickets for travel after 9.30am but some "off-peak" parking does not start until 4pm. Travelers may choose to depart from a different location or at different times based on these differentials, or they may choose to access the station in a different way.
- ***Onward travel information from destination*** – Are taxis available or do they have to be arranged in advance? Is purchase of a PlusBus ticket an option? This information can make a difference in the total cost of the journey as well as providing peace of mind or worry on arrival.

3. Are there any reasons why any of the information outlined above can't be provided at all, or certain points of sale?

Yes. The catalogue of information needed is long and some of it is not practical, possible or desirable to provide at all points of sale. Some of the reasons include:

- Most passengers won't pay attention to information not relevant to them at certain points in their transaction with the retailer. They don't demand access to the National Rail Conditions of Carriage or details about when and how to claim refunds or compensation every time they purchase a ticket, for example. They probably only become interested in those when something goes wrong. This type of information has to be "portable" from points of sale so it can be accessed later, perhaps long after the purchase is made, whether on a leaflet, website or by other digital means.
- Ticket offices are often very busy, especially at peak times. Ticket agents thus sometimes can't provide all of this needed information in detail without holding up and seriously inconveniencing other customers. There is variability in the knowledge of ticket staff and in their willingness or ability provide all this information.
- Stations in our patch are unstaffed or staffed only part time. Many do not have ticket vending machines (TVMs). Passengers are thus frequently dependent on guards on trains to buy tickets. There is great variability in the knowledge of train guards and in their willingness or ability to provide all this information. Very often, the portable machines they carry cannot issue the full range of tickets, anyway, nor do TVMs.
- During periods of severe disruption, information about delays or service is sometimes not available or the information available differs at different points of sale. Last year's flooding provided a good example. Information available at stations from staff, or on TOC/third party/National Rail websites was often inconsistent. This is also often true when bus replacement service is being used. It might be advertised at stations, but nothing appears on websites when purchasing tickets to warn about significantly different journey times.
- Trends in the consultation document show that more tickets are being purchased online or even mobile phones and fewer at ticket offices. Not all passengers have access to these points of sale for ticket purchases or information, however. The necessity for improved cost efficiency of the railway may limit the ability of TOCs to continue providing ticket sales and information from many different points of sale and in multiple ways even if these are desired by passengers.
- The ability to work with a real person is especially important given that there appear to be many serious technical problems with automated ticketing options. Some examples include:
  a) TVMs blank out if you are not quick enough pressing "BUY" button. If you aren't sure whether you've selected the right ticket option, the only choice is to cancel and start over which is very user-hostile
  b) TVMs can dispense tickets purchased online and valid between stations other than the point of collection but it's not possible to purchase a ticket from another origin at a TVM
  c) NRE Journey Planner can miss viable journeys if a walk between two stations is involved, for example between Windsor & Eton Central and Windsor Riverside, even if that journey is much shorter and cheaper than alternatives without the short walk
  d) Some tickets are only available at particular stations. For example, one can't buy a travelcard valid for zones 1-9 at Maidenhead, it's necessary to drive to Amersham. Booking it online seems impossible because one can't enter travelcard zones as a destination
     The idea that station staff can be replaced by technology is simply unrealistic given all these types of technical constraints.

4. If there are points of sale at which some of the information outlined above can't be provided, or can't be provided in a form that is useful to passengers, what measure do you take to mitigate for this and ensure that passengers buying their tickets from these points of sale have the information they need to make an informed decision?

During major disruption, information should probably come from a single source and be consistent across all points of sale.

Where possible, all information needed by passengers should be available from a variety of sources to meet the capacity, preference, and readiness of different passengers to access the information at varying points in their customer experience with the retailer.

No matter how pervasive digital information and ticket purchasing becomes, there should always be the potential for a truly interactive option for passengers, preferably a personal one, whether with a ticket agent, information booth staff or customer service representative. Many transactions can be repetitive and "mechanized" but the railway is too complicated and passenger experience too varied to make that true in every case.

5. Do you agree that a principles' based Code, such as is outlined above, is the best approach? For example, that it would provide the flexibility necessary to address the differing capabilities/uses of different points of sale and/or to respond to future developments?

We agree with the four principles presented which are:
- Retailers should provide passengers with the information they need to make informed decisions
- Retailers should present information in a way that is clear, intelligible, unambiguous, and timely
- The information retailers provide should be accurate, truthful and should not be provided in such a way as it might deceive, even if factually correct
- Retailers should be clear what tickets they sell at different channels and the basis on which they present tickets

The approach seems sensible and should provide flexibility for TOCs and passengers. We're not sure how this might actually change TOC behaviour. We do believe it's best to keep the approach as simple as possible, however. The problem is there is huge variability in the specifics of what information passengers need to make informed decisions. Depending on their "home" station and their technological willingness or capability, many passengers will have fewer options to accomplish that.

Unfortunately, the railway is very complicated. Passengers don't distinguish between Network Rail and TOCs when they experience disruption, but that relationship could influence whether and how they get refunds or compensation. It might not always be possible to present that information in an entirely clear, intelligible, unambiguous, way. The railway fare regime is also very complicated. Your fourth principle should help passengers navigate this, but not all of them will be willing and able to do so. Certainly complying with the spirit of all these principles will require diligence, attention and costs which we hope retailers will be willing and able to bear.

Finally, we question how retailers will be held accountable to this Code. What is the mechanism to flag violations of the principles, how does it work and what are the remedies?

6. Do you agree that the principles outlined above are appropriate to the provision of retail information to passengers? Are there any other principles that you think it would be helpful for the Code to cover?

It's best to keep it simple and the four principles cover what's important.

7. Are there any specific issues retailers are likely to face in complying with these principles, given the different characteristics of different sales channels (e.g. Ticket Offices, websites, TVMs, etc.)? For example from a technological, practical or cost perspective?

Please see response to Question 3.

8. Can you provide examples of good and/or bad practice of how retailers already provide information to passengers within this context?

Good Practice Examples:
FGW Customer Ambassadors at Maidenhead station – These are individuals available to assist passengers on the ground, answering questions about service, delays, onward travel options, explanations during disruption. They are very busy, which is testimony to the need for this role in providing customers with needed information. They are roam to different stations and are not always on duty, however. We would caution that they should be viewed as supplementary to reliable, regular station staff, not as a replacement.

Chiltern Railways Car Park Detail on Website – In addition to basic information about number of spaces at each station, there is an up-to-date PDF file of all current charges at each of their stations, including peak/off-peak thresholds. There is also detailed information about various payment options, including remote pay-by-phone.

Chiltern Railways Display of Peak Train Capacity – After a timetable change last year, passengers complained about overcrowding on popular peak services. First, CR staff made sure passengers were aware that sometimes only certain carriages were overcrowded and posted representatives on platforms to help distribute the crowds more evenly amongst carriages. Second, they produced posters for display in stations with a simple red, yellow and green graphics indicating of how crowded each peak train was. This allowed passengers to see where less crowded options were available if they could be flexible with their travel plans. As passengers have sorted themselves out across the new timetables, the capacity complaints are abating. It was a thoughtful, low-tech way of providing valuable information to passengers.

Bad Practice Examples:
First Great Western Peak vs. Off-Peak thresholds – It's almost impossible to find information about cut-off times for peak vs. off-peak tickets. Peak service used to be highlighted in timetables, but no longer. If the information is available on the company website, it is very well-hidden. It seems to be accepted wisdom that trains arriving at Paddington after 10am are off-peak but there are exceptions. The responses to the question about which Paddington departures are off-peak are hugely variable and confusing. As a result, passengers can't make informed decisions about travel times that might save them money or provide less congested trips.

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