

# TravelWatch NORTHWEST

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***Winner of CILT award for best practice in passenger transport***

*promoting quality public transport.....*

Phillip Willcox  
 Office of Rail Regulation  
 One Kemble Street  
 London  
 WC2B 4AN

21<sup>st</sup> November 2014

Dear Phillip,

## **Towards a code of practice on retail information**

Our comments are as follows –

### ***Chapter 3***

*1. Given the requirements of consumer law and industry specific obligations, do you agree 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 are in broad agreement with this question.

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

This is essentially comprehensive. Though not directly relevant we would just add that retail staff should be able to give relevant and accurate information about complaints procedures when asked.

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

There are likely to be occasions at ticket offices when pressure of work and time e.g. queues at ticket windows/ counters and no separate enquiry window/ counter result in less than full relevant information being given for particular journeys.

*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 measures*

*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?*

Adequate staffing should be provided at ticket offices. On websites there should be clear signposting to further information.

#### **Chapter 4**

*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?*

Yes we agree with this - it does provide flexibility. .

*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?*

Yes we are in broad agreement.

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

See also 3 above. Many passengers are unaware that they can buy tickets at station ticket offices from any other station to any other station, or that TOC websites offer this. As you point out, TVMs suffer from offering a restricted range of tickets for sale. Ideally they should have a wider range and at least give clear information that the range is limited and give advice as to where and how other tickets may be purchased.

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

Sorry we are not able to comment on this.

Thank you for the opportunity to respond

Yours faithfully

*John A Moorhouse*

John Moorhouse  
Company Secretary