

EQUALITY IMPACT ASSESSMENT GUIDANCE

Introduction

As an operator of public transport services, contracted by the Department for Transport, we are required to produce an Equality Impact Assessment/s (EqIA) for any change in policy, project or process as part of our National Rail Contract (NRC).

The need comes from the Equality Act 2010 and the Public Sector Equality Duty which requires public bodies and organisations that carry out public functions to consider everyone's needs when doing so. For instance, we need to consider how best to ensure that our stations and services are accessible for older and disabled customers and that our policies help all our employees to perform well.

An Equality Impact Assessment (EqIA) is the method we have chosen to demonstrate that we have met our duties within the Equality Act 2010. Like a risk assessment process, an EqIA is a tool that helps us to make sure that our programmes, policies, projects, and the way we operate services works well for our staff and our customers.

An EqIA anticipates the likely effects of our work on people with the characteristics that are protected by the Equality Act (age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation, marriage and civil partnerships), in short; everyone. Once any potential negative impacts have been identified, the EqIA can be used to plan ways to remove or mitigate these, wherever possible.

Public Sector Equality Duty

The Public Sector Equality Duty requires us to consciously think about the need to:

1. Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act.
2. Tackle prejudice and promote understanding, between people who share a 'protected characteristic' and people who don't (known as fostering good relations).

3. Advance equality of opportunity between people who share a 'protected characteristic' and people who do not share it by;
 - a. removing or minimising disadvantages experienced by people because of their protected characteristics;
 - b. meeting the needs of people with protected characteristics; and
 - c. encouraging people with protected characteristics to participate in public life when making decisions about how we:
 - i. act as an employer;
 - ii. develop, evaluate and review policy;
 - iii. design, deliver and evaluate services, and
 - iv. commission and procure from others.

Having due regard to the aims of the general equality duty is about using good evidence and information about who uses a service or facility or might want to do so in the future. It's also about good analysis of this evidence, at the right time, as part and parcel of our decision-making processes and shaping and providing inclusive services.

Case law has clarified that decision-makers need to:

- Be aware of the general equality duty and place equality considerations at the centre of policy formulation, side-by-side with other considerations, such as quality, cost, and time.
- Understand that the duty falls on them personally. What they know and what they take into account is what matters.
- Be clear that compliance with the general equality duty takes place before and at the time a particular policy is under consideration and when a decision is taken.
- Consciously consider the need to do the things set out in the aims of the general equality duty as an integral part of the decision-making process. They must recognise it is not just a matter of 'box ticking'.
- Have sufficient information to understand the effects of the policy, or of the particular decision, on the aims set out in the general equality duty.
- Review policies or decisions if circumstances change e.g. if the location of a project changes. This is vital as the duty is a continuing one.
- Take responsibility for complying with the general equality duty with regard to all relevant functions. Responsibility cannot be delegated to external organisations that are carrying out public functions on their behalf.
- Consciously consider the need to do the things set out in the aims of the general equality duty not only when a policy is developed and decided upon, but when it is being implemented.

This process, developed by Network Rail and recognised as best practice and utilised by many other operators and businesses within the rail industry enables us to clearly demonstrate how we fulfil our legal obligations with regards the Equality Act 2010, and shows our commitment to ensuring that our stations and services cater for all.

What is an Equality Impact Assessment?

To consider how we:

1. eliminate discrimination,
2. foster good relations between different people and;
3. advance equality of opportunity,

we need to understand the potential effect of our decisions, programmes, projects, policies and processes on different people.

Inclusive services should be shaped by evidence-based decision making and using a clear methodology will help you to collect, analyse and present evidence about diversity and inclusion and fairness in a consistent way. Additionally, it helps us to develop and deliver better policies and services.

An Equality Impact Assessment is an 8-step information-gathering and consultation tool similar to a risk assessment (see template at Appendix 1). An EqlA is used to predict the potential negative effects of our work and to work out what we can do to avoid them. It also helps us to identify potential positive effects so that we can promote them.

These 8 steps are:

1. Project/Change Scope
2. Collecting Evidence
3. Assessment of Impact
4. Consultation
5. Review
6. Action Planning
7. Sign off and Publication
8. Monitoring Real Impact

EQUALITY IMPACT ASSESSMENT

Work Force Reform: Station Ticket Office staffing – Customer Impact

Completed by:

Role:

Department:

Date Completed: 29th June 2023

SWR-DIA-2023: [Stations Change Proposal: Customer Impact](#)

Version	Author/Amender	Date
V1.1		29/06/2023
V1.2		17/07/2023

Background

Please note, that this is a working document in draft form. Throughout the approaching consultation period, South Western Railway will work closely with local user and accessibility groups to refine the impact and actions contained within this document. This will also include active engagement with Transport Focus and London TravelWatch over responses to the public consultation of these changes.

SWR have taken the initial approach of completing a single, network wide EqIA in recognition that these changes will impact the entire SWR estate, rather than one specific location. As such, we anticipate that any mitigation will apply to all impacted stations. Detailed analysis has taken place on a location-by-location basis to understand the demographics impacted as part of these proposals, and the level to which they are impacted by analysing specific ticket sales and passenger assist data. We will create individual EqIA's for each station location, and we expect these to be expanded following public consultation responses.

1. Project/Change Scope

Summary of Project / Change

This proposal looks at restructuring how we currently retail tickets at all the stations on the SWR network. This is part of an industry-wide programme of reform, as the industry looks to create a more sustainable cost base for the tax payer, and modernise the retail proposition.

For SWR, this proposal includes the closure of all 153 ticket offices across the SWR network, including the Network Rail managed stations of London Waterloo, Clapham Junction and Guildford. These plans will see colleagues move outside of the ticket office window, to a more prominent position within the station to better meet the needs of customers, and offer assistance. SWR currently has a ticket office full time equivalent (FTE) of 388, and these changes will see that number decrease to 154 FTE.

All currently staffed stations will remain staffed, and colleagues will transition to multiskilled roles, enabling more available support for customers. As an example of the benefits this will bring, in the future operating model, every station colleague will have an understanding of ticketing and fares, so that they can easily support customers with purchasing a ticket, either digitally or through a Ticket Vending Machine (TVM).

Of the 12% tickets bought at ticket offices nation-wide last year, an estimated 99% could have been bought using TVM or online. However, it is acknowledged that there are a small number of fares which can be more difficult to purchase. To provide an immediate mitigation to this, a certain number of locations across the SWR network will maintain the ability to retail these fares to customers who need them. Throughout this period, SWR will work with the industry, and Rail Delivery Group to establish and deliver a full range of retailing mitigations, to ensure that customers are able to continue to access all ticket types digitally, or through other means, as well as ensuring cash purchases are available in the future.

Assistance to customers who need it will continue to be provided as required, with our Assisted Boarding Points still available at every location (except Waterloo and Clapham Junction with dedicated assistance teams). These plans maintain at least one member of staff on-board each train, who can provide assistance boarding and leaving the train from first to last service.

These industry-wide plans are supported by four distinct pledges:

- Across the network there will be more colleagues available to give face-to-face help to customers out in stations than there are today
- Customers will never have to travel out of their way to buy tickets
- Those with accessibility needs will always be supported
- All rail staff will be treated fairly, and their new roles will be more varied and engaging.

Justification

This project is part of an industry Workforce Reform programme, which looks to modernise rail, whilst creating a more cost-effective operating model. Through the COVID-19 pandemic, nationwide restrictions led to a large drop in revenue for rail operators, and even now, the revenue income remains circa. 20% lower than before COVID-19. Over this period, the tax payer has subsidised train operating companies, and therefore these plans seek to position SWR as an efficient and responsible operator.

Historically, duties on the railway have been linear, with a focus on one or two specific duties. To create a modern railway, which meets the evolving needs of its customers, roles are required to be more fluid. The transition to a multiskilled workforce as part of these proposals, will help improve interaction between colleagues, and customers, with generally more staff available across stations (outside of ticket offices) who are trained and able to assist all customers, including those with disabilities.

Currently 75% of tickets are purchased through self-service channels (TVM or digital), which is a trend that is anticipated to increase. The closure of the traditional ticket office format will help to accelerate this channel shift. Similarly, ticket

office opening hours have remained largely unchanged since the late 1990s, even though our customer habits have significantly changed, highlighting again the strong justification for these changes taking place.

Location

This document will cover the potential impact of these changes at every single ticket office location across the South Western Railway network, listed in the table below. Whilst the demographic of each station will be considered, and detailed analysis will take place to measure the impact at each individual location, SWR is committed to ensuring that reasonable and practicable actions are in place to mitigate any negative impact. SWR intend for these actions to be considered, and consistent across the entire network, and for all customers.

Addlestone	Chertsey	Gillingham	Lymington Town	Ryde Esplanade	Twickenham
Aldershot	Chessington North	Godalming	Malden Manor	Ryde Pier	Upper Halliford
Alton	Chessington South	Grateley	Martins Heron	Ryde St Johns	Upwey
Andover	Chiswick	Guildford	Micheldever	Salisbury	Vauxhall
Ascot	Christchurch	Hamble	Milford	Sandown	Virginia Water
Ash	Clandon	Hampton	Millbrook	Shanklin	Walton On Thames
Ash Vale	Clapham Junction	Hampton Court	Moreton	Shawford	Wanborough
Ashford	Claygate	Hampton Wick	Mortlake	Shepperton	Wandsworth Town
Ashurst New Forest	Cobham & Stoke D'AberNn	Hamworthy	Motspur Park	Sherborne	Wareham
Axminster	Cosham	Haslemere	Mottisfont Dunbridge	Sholing	West Byfleet
Bagshot	Cranbrook	Havant	Netley	Smallbrook	Weybridge
Barnes	Crewkerne	Hedge End	New Malden	Southampton Airport	Weymouth
Barnes Bridge	Datchet	Hersham	New Milton	Southampton Central	Whimple
Basingstoke	Dean	Hilsea	Norbiton	St Denys	Whitchurch
Beaulieu Road	Dorchester South	Hinchley Wood	North Sheen	St Margarets	Whitton
Bedhampton	Earley	Hinton Admiral	Overton	Staines	Wimbledon
Bentley	Earlsfield	Holton Heath	Oxshott	Stoneleigh	Winchester
Berrylands	Eastleigh	Honiton	Parkstone	Strawberry Hill	Winchfield
Bitterne	Effingham Junction	Hook	Petersfield	Sunbury	Windsor & ER
Bookham	Egham	Horsley	Pinhoe	Sunningdale	Winnersh
Botley	Esher	Hounslow	Pokesdown	Sunnymeads	Winnersh Triangle
Bournemouth	Ewell West	Isleworth	Poole	Surbiton	Witley
Bracknell	Fareham	Kempton Park	Portchester	Swanwick	Woking
Brading	Farnborough	Kew Bridge	Portsmouth & SS	Sway	Wokingham
Branksome	Farncombe	Kingston	Portsmouth Harbour	Swaythling	Wool
Brentford	Farnham	Lake	Putney	Syon Lane	Woolston
Brockenhurst	Feltham	Liphook	Queenstown Road	Teddington	Worcester Park
Brookwood	Feniton	Liss	Raynes Park	Templecombe	Worplesdon
Bursledon	Fleet	London Road Guildford	Redbridge	Thames Ditton	Wraysbury
Byfleet & New Haw	Fratton	London Waterloo	Richmond	Tisbury	Yeovil Junction
Camberley	Frimley	Longcross	Romsey	Tolworth	
Chandlers Ford	Fulwell	Lymington Pier	Rowlands Castle	Totton	

Timescale

Consultation on these changes will take place, starting from the 5th July.

Implementation will follow, once rail passenger councils, customers, stakeholders, trade unions and employees have been appropriately consulted with.

2. Evidence

Current Business Practices

Ticket offices are currently open during the day, with specific operating hours at each individual location staffed by an SWR colleague. These ticket offices provide services, such as: ticket sales, season tickets, railcards, redemption of Rail Travel Vouchers, refunds, seat reservations and general enquiries.

TVMs are located at all of our stations (except Beaulieu Road, Holton Heath, Longcross, Millbrook, Redbridge, Mottisfont & Dunbridge, and Dean) for tickets sales and season ticket sales, however these TVMs are unable to issue refunds to customers if they have purchased a ticket in error. The TVM machines are maintained by TPU (Ticket Production Unit) within SWR, with this function having virtual access to every TVM on the estate if required.

Station facilities are currently opened when an SWR colleague is present at the station, this includes toilets and waiting rooms. The facilities are checked, and cleaned on a regular basis by station colleagues.

Lifts at stations are open 24 hours a day, except in exceptional circumstances and usually attributable to maintenance, vandalism or unsociable behaviour. These lifts across the SWR network are maintained by Stannah and Network Rail. Information on lift availability can be found on the National Rail Enquiries website, under the specific station page or via the Live Lift Map.

Assistance at stations and on-train is offered to customers through the Passenger Assistance Service, which includes older people, disabled people and customers who require additional help boarding or leaving the train. The assistance can be booked via the Passenger Assistance App, an online webform, or via telephone and textphone through our 24-hour Assisted Travel team. SWR also offer a 'Turn up and Go' (TUAG) Service and a unique Assisted Boarding Points service at all stations which allows customers requiring assistance to arrive at the station, and travel without booking. This service is offered by platform colleagues and the on-board teams. Station teams who are able can provide assistance from the station entrance to the train, and vice versa. Our on-board teams only provide assistance boarding and leaving the train.

SWR started using the Passenger Assistance Staff App in March 2023 and have seen a steady rise in the recorded TUAG customers throughout the network. The Passenger Assistance Staff app gives station and on-board colleagues more visibility of the assistances at their stations, or on their trains. This is a dynamic system, which allows a colleague to enter a TUAG customer into the app, immediately informing the alighting station, as well as the Guard on-board the train they wish to travel on. Station colleagues are still required, under the Passenger Assistance Handover Protocol, to phone through to the alighting station with the customer's details, their whereabouts on the train and the assistance they require. Station teams should also ensure they engage with the guard on each train to ensure they are aware of any customers requiring assistance. Guards in turn, are requested, wherever possible, to stand by the customer when arriving at their preferred station just in case the station team is not available to provide assistance.

Policies, Procedures and Requirements

Schedule 17 of the Ticketing & Settlement Agreement sets out the various arrangements between the operators relating to the carriage of passengers and the retailing of tickets. Consultation will take place over these elements, with SWR proposing to close all ticket offices with colleagues moving outside of the ticket office window, to a more prominent position within the station to better meet the needs of customers, and offer assistance.

Demographics

Three Annexes support this document. The content of these spreadsheets are detailed below:

- **Annex 1:** Outlines the number of ticket sales using the Disabled Persons Railcard, the Senior Railcard (available to all over the age of 60) or a Veteran's Railcard from a ticket office on four sample days (Friday 21st April, Saturday 22nd April, Sunday 23rd April and Tuesday 25th April). The figures included are the number of transactions currently undertaken during the proposed closure times of the ticket office.
- **Annex 2:** Outlines the facilities available at the affected stations including accessibility, lift availability, toilet facilities (including baby changing) and waiting room facilities. The spreadsheet also shows the percentage of older and disabled people in each affected area. Facilities will be closed (except lifts) when the station is unstaffed, the number of Passenger Assists recorded on sample days (Saturday 22nd April, Sunday 23rd April and Tuesday 25th April), are entered into the spreadsheet to analyse the number of individuals who could be affected with the closure of the facilities at the affected stations.
- **Annex 3:** Demographic data for each location within the Network Rail Southern region, which includes the entirety of the South Western Railway network, has been used to consider specific impacts that may arise as a result of these plans.

Local Plans

These plans form part of a larger programme, which looks to modernise the railway to better meet the needs of customers.

A station-by-station breakdown will be created as part of the proposal to the Trade Unions, and will be contained within the Public Consultation summary, and available on SWR's website.

Planned / Aspirational Developments

Alongside of the plans to close ticket offices, and redeploy colleagues to more prominent locations at stations, these proposals include plans to create a multiskilled workforce so that colleagues are better prepared to help every customer.

3. Assessment of Impact

Consider the 9 protected characteristics identified within the Equality Act 2010.

You should identify whether the proposed change will have a positive or negative impact upon people with these characteristics and provide details.

This activity should be carried out with consultation with colleagues across the business with suitable knowledge / expertise in the identified characteristics.

It is recognised at an industry level that there are a range of fares and services which will no longer be widely available as a result of these proposals, which may negatively impact all customers, as well as those with protected characteristics. To provide an immediate mitigation to this, SWR are proposing 24 locations across the network which will maintain capability to retail these fares, representing approximately 1% of tickets sold. Over the interim period that this mitigation is in place, SWR will work with Rail Delivery Group and the wider industry to establish methods to digitalise or simplify these fares. In the meantime, this mitigation is supported by industry pledges that "Customers will never have to travel out of their way to buy tickets" and "Those with additional accessibility requirements will always be supported." As part of this, SWR will review its Penalty Fares scheme, and ensure that appropriate discretion is shown to all customers. Specific fares, which are directly linked to protected characteristics are documented in the below table.

3. Assessment of Impact

Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Toilet Facilities</p> <ol style="list-style-type: none"> If toilet facilities are unavailable, especially Accessible Toilet with baby change facilities, travel may be impacted. This applies to both male and female customers. If toilet facilities are unavailable, especially Accessible Toilet Facilities as the universal non-gender specific toilet, travel may be impacted. Some toilet facilities at stations are gender neutral, so some customers may feel uncomfortable that a male/female has used the same toilet prior to them. Our A&I Forum expressed that it's difficult for many wheelchair users to use on-train facilities as the movement of the train impedes transfer between wheelchair and toilet seat. 	Disability	Y	<p>All toilets will be open in Category 1, 2, and 3 stations when there is a member of SWR staff on site. Some station opening times have increased with the proposal. (1, 2, 3, 4)</p>
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	Y	
	Religion/Belief	Y	<p>To improve availability of toilet facilities, we are looking at a remote access process. This is following feedback from our A&I Forum. (1, 2, 3, 4)</p>
	Gender	Y	
	Sexual Orientation	Y	
	Gender Reassignment	Y	<p>Although some station toilets are gender neutral, such as Southampton Central, the Accessible Toilet has always been unisex. (3)</p>
	Marriage/Civil Partnership	N	
			<p>There will be no change to Category 4 Stations or where facilities are currently unavailable.</p>

Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Staff Assistance</p> <ol style="list-style-type: none"> Although ticket office staff generally do not get involved in passenger assistance, we know that some do, especially on the West of England line. They often carry luggage or assist customers over footbridges at stations with no step-free access, or simply wait with the customer on the platform to ensure that the Guard sees them to assist. Confidence in travel may be reduced. Some stations on the SWR Network have 'barrow crossings' and need a member of staff to assist. Lack of hearing loops around the stations, currently for many stations they are only in the ticket office and not on platforms or around the station. Currently, a ticket office is a focal point of a station where customers can get assistance in buying a ticket and journey information, without ticket offices, the focal point of the station is lost. For customers with visual impairments, there is a risk that the person who is helping them is not a member of SWR staff. This is an issue when purchasing tickets with a bank card or generally asking for information and assistance. 	Disability	Y	<p>As part these proposals, during staffed hours at stations, colleagues will be more mobile and accessible, with appropriate training to better support colleagues in assisting customers. More colleagues trained to give assistance and provide answers on a broader range of questions should provide customers with greater travel confidence. (1, 2, 3)</p> <p>Colleagues will be available at stations to assist with ticket purchasing via a TVM. The TVM machines will become the focal retail point of the station to allow customers to enquire about tickets and journey assistance. A consideration of this would be for colleagues working at the TVM's to wear a different colour hi vis jacket in order to make themselves known to customers requiring assistance to purchase tickets.(5, 6)</p> <p>For consideration – colleagues to have an identifying mark (tactile) to help customers with visual impairments so they can be easily identified to a customer – Currently all colleagues are given Disability and Equality Awareness training which includes how to introduce yourself to customers with visual impairments. (6)</p> <p>Previously a trial has been undertaken at Basingstoke and Southampton Central Stations to have colleagues working outside of the ticket offices to offer assistance. This was a successful trial with 'Welcome Hosts' being available to help all customers. I1, 2)</p> <p>All colleagues affected by the proposals and who are currently not offering Passenger Assistance will be given additional training in line with existing colleagues to provide Passenger Assistance to customers. (1, 2)</p> <p>Hearing loops – these will need to be moved/installed at the retail focal point (TVMs) on the station. We should continue to expand Hearing Loop</p>
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	N	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

		<p>installation across the station to allow customers to hear key announcements. (4)</p> <p>As a consideration for customers with hearing loss, the Assisted Boarding Points scheme could be utilised to assist customers using the QR to contact the Video Contact Centre in Basingstoke for additional journey information, information during disruption etc</p>
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Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Sheltered Waiting Facilities</p> <p>1. If there are reduced staffed hours at a station, these facilities may be closed,</p> <p>2. This will include Calm Spaces at Brockenhurst, Salisbury and Woking and travel may be impacted for customers with both visible and non-visible disabilities.</p>	Disability	Y	All waiting rooms (where currently available) will be open in Category 1, 2, and 3 stations when there is a member of SWR staff on site. (1, 3)
	Age	Y	
	Pregnancy/Maternity	Y	Some station opening times have increased with the proposal. (1, 2, 3)
	Race	N	
	Religion/Belief	Y	
	Gender	N	To improve availability of waiting room facilities, we are looking at a remote access process. This is following feedback from our A&I Forum (1, 2, 3)
	Sexual Orientation	N	
	Gender Reassignment	N	
<p>Waiting Facilities</p> <p>3. Potential that these are being used as a prayer room in specific locations by certain customers, although this is not something which has become apparent during initial analysis. SWR will remain open to understanding this more throughout the consultation period of these changes.</p>	Marriage/Civil Partnership	N	<p>Calm spaces are available at Brockenhurst, Salisbury and Woking for customers with both visible and non-visible disabilities. (2)</p> <p>There will no change to Category 4 Stations or where facilities are currently unavailable.</p>

Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Rail Travel Vouchers</p> <p>1. RTV's are often issued by the Contact Centres as a Gesture of Goodwill in the event of failed assistance and complaints, and these can currently only be redeemed at a ticket office.</p> <p>Travel Warrants</p> <p>2. Provided to customers by Prison Service and Local Authorities for travel and these can currently only be redeemed at a ticket office</p>	Disability	Y	<p>SWR plans to introduce 24 locations across its network to retail these products (Category 1 stations), and work with the wider industry to establish solutions to ensure vouchers/travel warrants can be used for travel. (1, 2)</p> <p>Where Commercial Guards are available on SWR services, they are able to offer and assist customers with ticket purchases and journey information. When Arterios are introduced, the Guards will be upskilled from non-commercial to be able to provide some retailing options. All guards (Commercial and new, upskilled Metro Guards) can provide journey information, assistance and advice on the nearest retailing option/s. (1, 2)</p>
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	Y	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Moving around the station</p> <p>1. It has been identified by the SWR A & I Forum that this proposal is not just about purchasing a ticket, but it is an opportunity to look at the entire journey of a customer.</p> <p>This includes: Meeting points at a station entrance Locating Hearing Loops Locating Emergency Exits Locating Help points Locating Assisted Boarding Points.</p>	Disability	Y	<p>This proposal gives SWR and other Train operators the opportunity to explore how customers use their stations and how people move around the station. (1)</p> <p>Staff training – SWR colleagues will be given the necessary Customer Service, Retail, Safety, and Disability and Equality Awareness Training to best support customers in travelling with us. (1)</p> <p>There are a number of initiatives which deal with some of the issues raised, for example, Network Rail installing tactile paving on the edge of every platform across the network by March 2024.(1)</p>
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	Y	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Ticket purchasing</p> <p>1. Although most ticket types are available from the TVMs, if they are not physically accessible to somebody, there is a risk that some customers may feel like children if a member of staff has to push the buttons/control the machine on the customer's behalf, and not be independent for travel.</p> <p>2. We know that customers often purchase Advanced tickets to for their journey. These fares are not available to purchase via the TVM, only via Ticket offices and online.</p> <p>Ticket Purchase Online</p> <p>3. If the ticket were bought on SWR website, you must use the same card to collect. Only Contact Centre or ticket office can override this, which can take a period of time, delaying customer travel.</p> <p>Wheelchair discount</p> <p>4. Many wheelchair users travel in their own wheelchair and do not transfer into a seat, they can receive an up to 50% discount on their ticket price which is only available at a ticket office. (This discount is only available on certain ticket types.)</p> <p>Digital Ticketing</p> <p>5. Many older people may not have smartphones or know how to use one.</p> <p>Foreign bank cards</p>	Disability	Y	<p>SWR Colleagues will be available at Category 2 and 3 stations to aid and assist customers using a TVM, or purchasing the ticket online. (1, 5)</p> <p>Where Commercial Guards are available on SWR services, they are able to offer and assist customers with ticket purchases and journey information. When Arterios are introduced, the Guards will be upskilled from non-commercial to be able to provide some retailing options. All guards (Commercial and new, upskilled Metro Guards) can provide journey information, assistance and advice on the nearest retailing option/s. (1, 2, 5)</p> <p>All colleague training will be rolled out to all grades affected by the proposal to increase their knowledge of ticket types, discounts, railcards and journey planning.(1, 2, 4, 5)</p> <p>SWR are working to ensure that the majority of tickets will be available on the TVM machines and online. SWR will work with the wider industry to establish solutions to purchase these niche ticket types and payment options. (2, 4, 6)</p> <p>Tickets purchased at a TVM or on board a train will be the same price as a ticket previously sold at a ticket office. (7)</p> <p>SWR Retail to consider 'any card collect' for tickets purchased on line (via SWR website) and to be collected at the station. Customers to choose the option on E-ticket when purchasing ticket and therefore will not need to pick up ticket from TVM. (3)</p> <p>There will be no change to Category 4 Stations as these are currently and will remain unstaffed.</p>
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	Y	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

<p>6. Often not accepted on TVMs, to be used to purchase a ticket online or via TVM ticket collection.</p> <p>Cost of tickets</p> <p>7. Ticket can sometimes be cheaper at a ticket office than on a TVM or on board a train.</p>		
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Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Lift Availability</p> <p>1. A number of customers rely on using the lifts to move around a station. When lifts are out of service, occasionally customers are unaware of this. If a customer does not require passenger assistance but needs to use a lift due to luggage, small children etc, occasionally they are not informed by the guard that the lifts are not working at some stations. More information on lift availability is required.</p>	Disability	Y	Network Rail and the Train Operating Companies have launched a 'Live Lift Map' which is available to all customers which give live, up to date information on lift availability across the network. (1)
	Age	Y	
	Pregnancy/Maternity	Y	SWR to improve their reporting of lift faults and information passed onto the CIS system so that customers can be informed of out of use lifts at the earliest opportunity. We are working with Network Rail to get live data feeds from lifts so that they can report a fault automatically. (1)
	Race	N	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
Marriage/Civil Partnership	N	Lift availability needs to feed into the Passenger Assist system and journey planners automatically. We are exploring this with all industry partners. (1)	

Potential of Negative Impact	Characteristic	Y/N	Mitigation
<p>Ticket Vending Machines</p> <ol style="list-style-type: none"> Not accessible for wheelchair users due to the height of the screen and card reader. No audio available so not accessible for visually impaired customers and customers with reduced literacy levels. For customers with visual impairments the contrast on the TVM screen is a challenge along with no ability for the TVM to 'talk back' to the customer. Limited provision for customers with Learning Difficulties and Learning Disabilities to operate/understand the machine, who would normally have purchased their ticket with the help of ticket office colleagues. TVM machines could be difficult to navigate by the older generation or customers with limited finger and manual dexterity. Many TVMs are only in English, and therefore cause a barrier for foreign visitors with limited knowledge of the English Language. Foreign bank cards are often not accepted on TVMs, to be used to purchase a ticket online or via TVM ticket collection. 	Disability	Y	<p>SWR colleagues will be available at Category 2 and 3 stations to aid and assist customers using a TVM. (1, 2, 4, 5, 6)</p>
	Age	Y	
	Pregnancy/Maternity	N	<p>There will be a TVM audit for all Train Operating Companies on the capabilities and accessibility of TVM machines across all networks, this will include additional language provision for non-native English speakers. (1, 2, 3, 4, 5, 6, 7)</p>
	Race	Y	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	<p>All colleague training will be rolled out to all grades affected by the proposal to increase their knowledge of ticket types, discounts, railcards and journey planning. (1, 2, 3, 4, 5, 6, 6)</p>
	Marriage/Civil Partnership	N	
			<p>All colleagues to keep up to date with Disability & Equality Awareness Training provided by SWR. (1, 2, 3, 4)</p> <p>There will no change to Category 4 Stations or where facilities are currently unavailable.</p>

Potential of Negative Impact	Characteristic	Y/N	Mitigation
Taxis 1. Ranked Taxis can be used during disruption for customers, when our recognised provider (FTS) is unable to source. Generally, these taxi drivers for Ranked Taxis would claim their fare back from a ticket office. With less stations having the facilities to do this, drivers may refuse, impacting customer travel. Arriving at a station by Taxi 2. If a customer is arriving at a station by Taxi, often the taxi driver will assist the customer to the ticket office, SWR Staff need to be visible and available near the entrance of the station.	Disability	Y	Taxis - SWR will work with the wider industry to establish solutions these issues. (1) A consideration could be for Welcome Hosts (as previously trialled at Basingstoke and Southampton Central) to be available at the front of the station so that there is a focal point/person available for customer who require assistance from taxi to station. The gateline (where available) would be the other focal point on a "staffed" station. The help-point is available on each platform. (2) There will be no change to Category 4 Stations.
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	N	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

Potential of Negative Impact	Characteristic	Y/N	Mitigation
Railcards 1. These products are not available to purchase on TVMs, and only available via ticket office currently and online. SWR will work with the industry to establish solutions for this issue.	Disability	Y	SWR proposes 24 interim locations to mitigate this impact where these will be available to purchase for customers who require them. To support this, there is an industry pledge that "customers will never have to travel out of their way to buy tickets." (1) To clarify, Disabled Persons Railcards have never been available to purchase directly from the ticket office as they require further validation by a third party. (1) There will no change to Category 4 Stations
	Age	Y	
	Pregnancy/Maternity	N	
	Race	N	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

Potential of Negative Impact	Characteristic	Y/N	Mitigation
Security and Safety 1. With fewer colleagues available or reduced colleagues presence at some locations, customers may not feel as safe travelling or waiting within the station. 2. With fewer staffing hours available at some locations, stations may become a place for targeted intimidating behaviour from perpetrators. 3. Reporting of unsociable behaviour – Reporting of intimidating/unsociable behaviour will be more difficult with fewer staffing hours available at some stations. Managing Suicidal Contacts 4. With fewer staffing hours available at some station, concerns have been raised about customers who are in a vulnerable state and wish to end their life.	Disability	Y	SWR staff at many stations will be more visible and mobile to create a safe environment during the staffed hours. (1, 2, 3, 4) Trespass and Welfare officers will continue to be stationed on platforms where there is deemed a risk of suicidal contacts. In the past, front line colleagues have undertaken Managing Suicidal Contacts training facilitated by the Samaritans. (3) We can better advertise how customers can advise SWR Contact Centre and the British Transport Police of unsociable or dangerous behaviours. Help Points are available on every platform which call through to our control team 24/7. Help Points and calls to SWR/BTP can also report any concern for welfare. (3, 4) There will be no change at Category 4 Stations.
	Age	Y	
	Pregnancy/Maternity	Y	
	Race	Y	
	Religion/Belief	Y	
	Gender	Y	
	Sexual Orientation	Y	
	Gender Reassignment	Y	
	Marriage/Civil Partnership	Y	

Potential of Negative Impact	Characteristic	Y/N	Mitigation
Journey Information 1. Ticket offices are able to print off a personalised itinerary of a journey for a customer – will this be available in the future.	Disability	Y	If the journey is being planned in advance, the Contact Centre can create, print and send an itinerary to the customer. If the customer has an email address, the contact centre can email the customer the itinerary. (1) Tablets – if colleagues on the station have a tablet or use their mobile phone, and the customer has an email address, that station colleague can create and email the itinerary for the customer. This covers both advance and on-the-day travel. (1)
	Age	Y	
	Pregnancy/Maternity	N	
	Race	Y	
	Religion/Belief	N	
	Gender	N	
	Sexual Orientation	N	
	Gender Reassignment	N	
	Marriage/Civil Partnership	N	

4. Consultation

Good practice will see representatives consulted for each protected characteristic group where a potential negative impact has been identified.

Consultee	Characteristic	Record of Engagement	Potential issues raised
Accessibility & Inclusion Forum	Disability Age Gender	Meeting held with A & I Forum on 5 th July 2023.	
Wider Public	All	Ticketing & Settlement Agreement Major Change Consultation facilitated through Transport Focus and London TravelWatch.	
Trade Union Representatives	All	Consultation on these plans, and the impact they have on customers and colleagues will be considered.	
Local Accessibility Groups	Disability, Age	Zoom call held with local accessibility groups on 14th July 2023. The call explained the consultation in more detail and some attendees fed back their challenges.	

5. Review

Acting as a gateway, based on the evidence, identified potential risks and consultation responses, next steps must be determined:

Action	Tick
<p>Proceed No potential risks have been identified and consultee feedback has raised no concerns which need to be addressed. <i>(Skip section 6)</i></p>	
<p>Proceed (with Mitigations) Produce an action plan which mitigates all identified potential risks and concerns raised by consultees without affecting the scope of the project/change.</p>	
<p>Change Risks have been identified which cannot be mitigated without changing the scope of the project/change.</p>	
<p>Stop Risks have been identified which cannot be mitigated or addressed through a change of scope.</p>	

6. Action Plan

Ref	Action	Owner	Due Date
1	Rail Travel Vouchers (issued as a gesture of goodwill) will need to be changed to e-Vouchers, which can be used online. Discussion to be had with Customer Contact Centre and Retail/Audit teams locally, and engagement with Rail Delivery Group on industry approach and solution for these, and other outlying fares.	Retail	TBC in-line with industry direction of fares
2	Data Analysis of station facilities proposed opening times and passenger assistance bookings on sample days (22 nd April 23 rd April and 25 th April 2025) (Annex 2)	Customer Strategy Team	02/06/2023
3	Data Analysis of passenger assistance bookings and ticket sales with disability/older persons/veterans railcards for proposed ticket office opening times (21 st April, 22 nd April 23 rd April and 25 th April 2025) (Annex 1)	Customer Strategy Team	02/06/2023
5	Ensure new Multiskilled staff are available at stations to provide assistance, with no currently staffed location becoming unstaffed.	Project Team	In-line with implementation and launch
6	Accessibility and Inclusion Forum gave their support for remote access to toilet and waiting room facilities in the absence of staff at the station which was a reoccurring impact under many of the characteristics. The Project Team and Customer Strategy team will explore feasibility of this further.	Project Team & Customer Strategy Team	Prior to Implementation
7	Establish a process for reimbursement of taxi 'dockets' in lieu of Ticket Offices, at stations which are can no longer provide this service.	Project Team	Prior to Implementation

8	Additional posters at SWR managed stations advertising that Assisted Boarding Points are the recognised meeting point at the station.	Customer Strategy Team	
9	Appropriate training of all colleagues to increase knowledge of ticketing, and products such as Railcards. Training to include locations to purchase railcards, as well as Terms and Conditions. This will be for all station colleagues, on-board teams and contact centres.	Project Team & Customer Experience Trainers	Prior to Implementation
10	Alignment and solutions for the 1% of fares which are not available digitally or through a TVM will be developed at an industry level. In the immediate, SWR will offer 24 locations where these fares and services are available (refunds, railcards, advance purchase etc.) until solutions are established. SWR will proactively feed into the industry objective of simplifying these products and services wherever possible.	Rail Delivery Group	On-going
11	Explore TVM functionality to accept foreign national cards, and increase range of available languages to support customers travelling.	Retail Team & Rail Delivery Group	On-going
12	Local Authority/Justice System Travel vouchers which can only be redeemed at Ticket Offices – Discussion to be had on how to resolve this issue	Retail	TBC in-line with industry direction of fares

7. Approval

STATEMENT:

To the best of my knowledge, I am content that all potential risks brought about by the delivery/implementation of this project/change affecting those with protected characteristics have been identified and that suitable steps have been taken to mitigate against these or amend the scope to ensure no resulting detriment to their experience or the service offered.

Senior Manager

Name:
Role:
Date:
Signature:

Exec Sponsor

Name:
Role:
Date:
Signature:

Senior Accessibility & Inclusion Manager

STATEMENT:

I have reviewed the content of this Equality Impact Assessment and agree with its content and the actions put forward to ensure that the service offered to customers with protected characteristics are appropriate.

Name:
Date:
Signature:
