

# Equality Impact Assessment (EIA) – Penrith North Lakes

## Station Reform – Penrith North Lakes Ticket Office

Note: this is a live document and may change if further information becomes available or as a result of ongoing consultation.



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## 1. Introduction

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| <b>Name of project and brief description</b> | <p>Station Reform – a public consultation on the potential closure of station ticket offices.</p> <p>The proposal for Penrith North Lakes is that employees with specialist ticketing knowledge move out from behind the ticket office counter to what is now the main entrance lobby of the station, where they will greet customers, provide ticket advice, share information and support customers to purchase tickets.</p> <p>For the avoidance of doubt, this proposal has no impact on the availability of booked and unbooked Passenger Assistance.</p>  |
| <b>Objective of project</b>                  | <p>A public consultation on proposed changes at Penrith North Lakes has now closed and Transport Focus are considering the feedback, as part of industry reforms. The proposal could see the closure of counter service at the station. Staff will move out to around the station, primarily being located by TVM which at Penrith is in the booking hall area just inside the entrance to the station and very close to where the current ticket office counters are located.</p> <p>As part of the reforms, station employees will continue to provide advice about the best and cheapest fares, as well as support customers with accessibility needs. All ticket types will be available during the hours that specialist ticketing support is available.</p> |

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|  | <p>Proposed change to Penrith North Lakes ticket retailing</p> <p><b>Prior to change, ticket office opening hours:</b></p> <p>Monday to Friday - 05:30 – 19:00</p> <p>Saturday – 05:30 – 19:00</p> <p>Sunday – 11:30 – 19:00</p> <p><b>Proposed specialist ticketing support hours</b></p> <p>Monday to Friday – 09:00 – 18:00</p> <p>Saturday – 09:00 – 17:45</p> <p>Sunday – 10:30 – 17:30</p> <p>During the hours of specialist ticketing support, a Customer Ambassador will be available in the TVM area to greet customers, provide ticket advice, as well as support customers with accessibility needs.</p> <p>Outside of specialist ticketing support hours the station will continue to be staffed from first train to last train.</p> <p>Avanti West Coast (AWC) aims for our plans to be inclusive and meet the needs of all customers. We have engaged with disabled groups throughout the consultation, through our accessibility panels, both national and regional.</p> <p>This feedback has shaped this document, which may continue to be refined as we identify risks, opportunities, and mitigations throughout the next project stages.</p> |
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## 2. Impacts on customers with Protected Characteristics

Impacts have been recorded below. As the project progresses, more impacts may be identified which will be added to the tables below. Impacts and mitigations may also change in detail as more information is discovered. Once worked through, owners of each impact and mitigation will be named with a target date and delivery date for each mitigation. Progress of these mitigations will be monitored through project reviews throughout the process.

| Characteristic    | Impacts  | Mitigation   |
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| <b>Disability</b> | Penrith ticket office is a known space for passengers to find staff and receive assistance, not just for purchasing tickets. This could result in passengers not receiving the support they need leading to them no longer choosing to travel by rail. | <ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support, a Customer Ambassador will be based at the entrance to the station, near the TVM to greet customers, provide ticket advice, share information, and support customers with accessibility needs. The area where the Customer Ambassador will be available is very similar to today, meaning customers will not have to change their journey through the station in order to get the ticketing support.</li> <li>• Because of the number of multi-skilled staff at Penrith, other station colleagues have sufficient ticketing knowledge to be also able to assist customers in this way, as is the case currently.</li> <li>• Passenger Assistance meeting point will remain the desk in the main entrance waiting room where customers will be able to get support.</li> <li>• The location of the Passenger Assistance meeting point will continue to be communicated to customers through the process of booking assistance</li> </ul> |

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|  | <p>Some customers do not use mobile devices and may not be able to use or comfortable using Ticket Vending Machines (TVMs).</p>                               | <ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support, a Customer Ambassador will be based in the waiting room near the main station entrance, near the TVM, to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>• The Customer Ambassador will have access to a portable machine to sell tickets if the ticket is not available on TVMs.</li> <li>• Because of the number of multi-skilled staff at Penrith, other station colleagues have sufficient ticketing knowledge to be also able to assist customers in this way as is the case currently.</li> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> </ul> |
|  | <p>Penrith ticket office has hearing loops installed at counters.</p>   | <ul style="list-style-type: none"> <li>• Staff will continue to use an induction loop to communicate with customers.</li> <li>• Customers may request to be taken to a quieter area of the station, and the Customer Ambassador will be able to move with the customer and sell tickets.</li> </ul>   |
|  | <p>This project may lead more customers to use the TVMs. TVMs may not be accessible for some disabled customers, including those with visual impairments.</p> | <ul style="list-style-type: none"> <li>• The current TVM operating system includes best practice colour contrasting, font size etc. As a result, some visually impaired customers will still be able to use the TVMs.</li> <li>• Staff will be available in the TVM area (as well as elsewhere in the station) to support customers.</li> </ul>   |

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|  |   | <ul style="list-style-type: none"> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> <li>• The Customer Ambassador will have access to a portable machine to sell tickets if the ticket is not available on TVMs.</li> <li>• Tickets will be available to purchase via the AWC website or app and also through a telephone call to the AWC Contact Centre</li> <li>• The AWC website is built to WCAG 2.1 AA standard; including screen readers functionality, appropriate colour contrasting and alt-text.</li> </ul>   |
|  | <p>The physical design of TVMs makes it difficult for wheelchair users to get close to machine.</p> | <ul style="list-style-type: none"> <li>• The current design of the TVMs includes action buttons located at the bottom of the screen so wheelchair users are able to use the TVM to purchase tickets.</li> <li>• During the hours of specialist ticketing support, a Customer Ambassador will be based at the entrance to the station, near the TVM, to greet customers, provide ticket advice, share information, and support customers with accessibility needs. This is next to the existing ticket office counters so customers will not be required to change their journey through the station to access this ticketing support.</li> <li>• Because of the number of multi-skilled staff at Penrith, other station colleagues have sufficient ticketing knowledge to be also able to assist customers in this way as is the case currently.</li> </ul> |

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|  |   | <ul style="list-style-type: none"> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> <li>• Tickets can be bought via the AWC website or app and also through a telephone call to the AWC Contact Centre.</li> </ul>   |
|  | Customers (including autistic customers) are confident in their routine which could mean purchasing from the same people/windows in ticket offices. | <ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support, a Customer Ambassador will be based at the entrance to the station, near the TVM, to greet customers, provide ticket advice, share information, and support customers with accessibility needs. This is next to the existing ticket office counters so customers will not be required to change their journey through the station to access this ticketing support.</li> <li>• Because of the number of multi-skilled staff at Penrith, other station colleagues have sufficient ticketing knowledge to be also able to assist customers in this way as is the case currently.</li> </ul> |
|  | Guide dogs are trained to go to the ticket office or find other static points within stations.  | <ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support, a Customer Ambassador will be based at the entrance to the station, near the TVM, to greet customers, provide ticket advice, share information, and support customers with accessibility needs. This is next to the existing ticket office counters so customers with guide dogs will not be required to change their journey through the station to access this ticketing support.</li> <li>• Targeted communications to specific disability groups will support new processes.</li> </ul>   |

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|  |  | <ul style="list-style-type: none"> <li>The Passenger Assistance meeting point will not change.</li> </ul>   |
|  | Some disabled people may be more likely to use cash instead of cards as this is seen as easier than card payments. | <ul style="list-style-type: none"> <li>A cash TVM is already in place at the station.</li> <li>The Customer Ambassador will have access to a portable machine to sell tickets.</li> </ul>   |
|  | Railcards aren't available at the station.   | <ul style="list-style-type: none"> <li>Disabled Persons Railcard already has to be applied through post or online to prove eligibility</li> <li>Railcards will be available online</li> </ul>   |
|  | Changes will need to be made to our Accessible Travel Policy.  | <ul style="list-style-type: none"> <li>Changes to be made in collaboration with the Office of Rail and Road (ORR)</li> <li>Commitments to Passenger Assist, the two-hour booking window and a Turn-Up and Go service will be met</li> </ul>   |
|  | A customer with learning disabilities may struggle to use TVMs   | <ul style="list-style-type: none"> <li>During the hours of specialist ticketing support, a Customer Ambassador will be based at the entrance to the station, near the TVMs, to greet customers, provide ticket advice, share information, and support customers with accessibility needs.</li> <li>Because of the number of multi-skilled staff at Penrith, other station colleagues have sufficient ticketing knowledge to be also able to assist customers in this way as is the case currently.</li> </ul> |



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|  |  | <ul style="list-style-type: none"> <li>• The Customer Ambassador will have access to a portable machine to sell tickets, if the required ticket is not available on TVMs.</li> <li>• Tickets can be bought via a telephone call to the AWC Contact Centre</li> <li>• Continuous feedback will be incorporated to improve TVM functionality. This includes ongoing user trials with disabled customers.</li> </ul>   |
|  | A visually impaired customer may not be able to find help points if no staff are around                        | <ul style="list-style-type: none"> <li>• Proactive staff will be available at the station from first to last train</li> <li>• The Passenger Assistance meeting point will be located close to the main station entrance and TVM area, and will include consistent signage, accessible seating and a Help Point</li> <li>• The location of the Passenger Assistance meeting point will continue to be communicated to customers through the process of booking assistance</li> </ul> |
|  | If a help point is needed, a hearing-impaired customer may struggle to use this.                               | <ul style="list-style-type: none"> <li>• Induction loops will be available at Help Points.</li> <li>• Help Points will be tested regularly.</li> </ul>  |
|  | A customer with cognitive disabilities may not know where to go if they are used to going to the ticket office | <ul style="list-style-type: none"> <li>• During the hours of specialist ticketing support, a Customer Ambassador will be based at the entrance to the station, near the TVMs, to greet customers, provide ticket advice, share</li> </ul>   |

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|            |  | <p>information, and support customers with accessibility needs. This is next to the existing ticket office counters so customers will not be required to change their journey through the station to access this ticketing support.</p> <ul style="list-style-type: none"> <li>• Because of the number of multi-skilled staff at Penrith, other station colleagues have sufficient ticketing knowledge to be also able to assist customers in this way as is the case currently.</li> <li>• The Passenger Assistance meeting point will be located close to the main station entrance and TVM area, and will include consistent signage, accessible seating and a Help Point.</li> <li>• The location of the Passenger Assistance meeting point will continue to be communicated to customers through the process of booking assistance.</li> <li>• A queueing system will be implemented where required, and practicable, in the form of retractable belt barriers. Alternatively, the Customer Ambassador can prioritise customer needs with a triage type approach.</li> </ul> |
| <b>Age</b> | Elderly customers may be more likely to want to use cash and less likely to use digital devices. | <ul style="list-style-type: none"> <li>• At least one TVM at every Avanti West Coast location will accept cash</li> <li>• Colleagues able to sell tickets via portable machine</li> </ul>   |

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|---------------------------------------|---|---|
| <b>Marriage and Civil Partnership</b> | Not impacted  | N/A   |
| <b>Pregnancy and Maternity</b>        | Not impacted  | N/A   |
| <b>Race</b>                           | For many of our customers, English is not their first language. Using the ticket office can be seen as the easiest option to buy tickets and get the information they need. | <ul style="list-style-type: none"> <li>• Ticket websites and apps available in other languages</li> <li>• TVMs have language options for ease of use</li> <li>• Colleagues able to support use of TVMs and provide information</li> </ul> |
| <b>Religion and belief</b>            | Some religious groups may discourage the use of digital technology.   | <ul style="list-style-type: none"> <li>• Staff are available in the TVM area (as well as elsewhere in the station) to support customers</li> <li>• Customers able to purchase ticket via telephony</li> </ul>                             |
| <b>Sex</b>                            | Not impacted  | N/A   |
| <b>Sexual Orientation</b>             | Not impacted  | N/A   |
| <b>Gender Reassignment</b>            | Not impacted  | N/A   |



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### 3. Positive impacts on customers with protected characteristics

| Characteristic                 | Positive impacts  |
|--------------------------------|---|
| Disability                     | <ul style="list-style-type: none"><li>• Customer Ambassadors are proposed to be trained in Passenger Assist, making the process more robust and reliable</li><li>• Staff will be more flexible to address the specific needs of customers (e.g. being able to move around stations with the customer) than they would be when behind a counter in the ticket office, which at Penrith is currently behind a glass screen.</li></ul> |
| Age                            | As above  |
| Marriage and Civil Partnership | As above  |

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|--------------------------------|----------|
| <b>Pregnancy and Maternity</b> | As above |
| <b>Race</b>                    | As above |
| <b>Religion and belief</b>     | As above |
| <b>Sex</b>                     | As above |
| <b>Sexual Orientation</b>      | As above |
| <b>Gender Reassignment</b>     | As above |

## 4. Consultation

Consultation with impacted groups is being undertaken throughout this process. For any feedback or issues that result in more consultation needed, this will continue to take place with specific groups. Consultation will continue to take place throughout the process as more issues and opportunities are discovered. General feedback is recorded below.

| Consultee                     | Protected characteristic | Comment raised  |
|-------------------------------|--------------------------|---|
| Accessibility Panel           | Disability               | New impacts added above. These focus on the need for collaboration through the process, the improvements for other channels and how staff visibility is still needed at stations. |
| Regional Accessibility Panels | Disability               | Concerns raised over where to find staff as it's a smaller team than larger stations. Customer Ambassadors will be based in the main entrance by the TVM.                         |
| Accessibility Facebook group  | Disability               | Nothing specific for Penrith.   |

Avanti West Coast welcomes further feedback on this document. Feedback can be sent to [accessibility@avantiwestcoast.co.uk](mailto:accessibility@avantiwestcoast.co.uk)