

Equality Impact Assessment (EqIA)

Project title	Ticket Office Project
Department	Passenger Services Directorate
Date	07/10/24

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Document History

Version No.	Date	Reason for Issue
1.0	07/10/2024	Initial draft for review

Document Approval and Sign-off

		Name and Job Title	Signed	Date
Part A and B	EqlA Owner (The person responsible for completing the EqlA)	[Redacted]		
Prepared in collaboration with: — [Redacted]				
EqlA Panel review date:				
EqlA Panel decision:				

Equality Impact Assessment

What is an Equality Impact Assessment and why do we need one?

An Equality Impact Assessment is a way of looking at decisions, policies and practices systematically to understand any disproportionate impact and how they could potentially affect groups of people sharing the same protected characteristic.

At Southeastern Railway, we see EqlAs as so much more than filling in a form. The process is designed to create an inclusion mindset that can impact the way decisions are made within our organisation. To ensure inclusion and equality are considered in every aspect of our organisation.

When do we need to complete an EqlA?

The EqlA is required for projects/ pieces of work that may have an impact on our colleagues or passengers. It is a living document and should be reviewed as work progresses and changes. If you are unsure, take a look at part A in this document or head over to the EqlA SharePoint page for more guidance: [Equality Impact Assessments \(EqlA\) \(sharepoint.com\)](https://sharepoint.com)

EqlAs are integral for identifying negative and potential adverse impacts but also give us a great opportunity to promote amazing work in equality and inclusion.

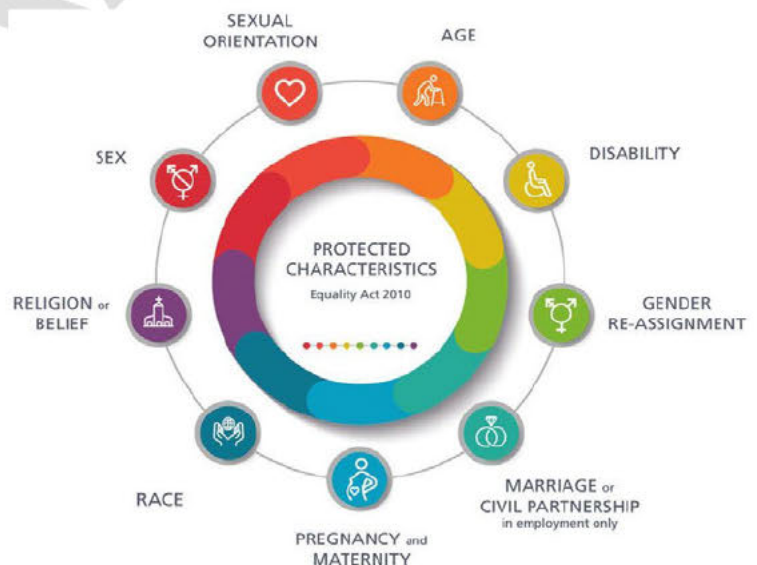
As a public sector organisation, we have duties under the [Public Sector Equality Duty](#) to:

- Eliminate prohibited conduct
- Advance equality of opportunity
- Foster good relations

Protected Characteristics

The different groups reviewed in the EqlA are outlined in the [Equality Act 2010](#) and are referred to as protected characteristics these are:

- age,
- disability,
- gender reassignment,
- marriage and civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex,
- sexual orientation.



Some examples

- The introduction of a new system for colleagues to use. Therefore, considerations need to be made around accessibility features to ensure it is inclusive to those who are neurodiverse or with visual impairments or colour blindness for example.

- Changes to uniform policy such as the introduction of shorts for front-line colleagues. This might include gender-inclusive sizing options and maternity wear.
- When assessing the impacts of taking a platform lift out of service, you may identify that the platform is now inaccessible to anyone who is unable to navigate stairs. Therefore, a work around needs to be implemented and communicated between staff and passengers.
- When changing the seat covers, carpets and table covers. An impact assessment may identify that there are too many colours, patterns and textures for some individuals which may cause sensory overload.
- When there are engineering works, audio and visual information is needed. This enables the information to reach those who are visual impaired, D/deaf, adults and children who are unable to read and for individuals where English is not their first language.
- The introduction of a new IT systems for colleagues to use. Therefore, considerations need to be made around accessibility features to ensure it is inclusive to those with visual impairments or colour blindness.

Part A: EqlA Preliminary Questions

1. Please tick any of the protected characteristics below which your work may impact?

- ☐ Age
- ☒ Disability
- ☐ Gender reassignment
- ☐ Marriage and Civil partnership
- ☐ Pregnancy and Maternity
- ☐ Race
- ☐ Religion
- ☐ Sex
- ☐ Sexual Orientation

If you have ticked any of the protected characteristics above. Please continue onto part B.

If you have not ticked any of the boxes above, please provide justification below as to why you do not think the project will impact people with protected characteristics.

Explanation as to why there are no impacts expected for people with protected characteristics.

Notes here:

- Please now submit this to [REDACTED] so your response can be saved.

Part B: EqIA

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1. Please select the type of EqIA from the list.

- ☐ The built environment
- ☐ Events & Communications
- ☐ Policies & Standards
- ☐ Information Technology IT
- ☒ Change Programmes (reorganisations, transformations)
- ☐ Procurement
- ☐ Digital experience
- ☐ Retail and ticketing
- ☐ Branding & Marketing
- ☐ Other, please specify

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2. Please provide a summary of the work this EqIA is referring to.

In addition, please attach any supporting materials such as maps, images, project plans.

Question	Response
What are the aims/objectives?	<p>Southeastern is aiming to create a better, safer, more accessible railway at lower cost.</p> <p>In 2022 [REDACTED] went through the ticketing settlement agreement minor change process to remove the requirement for an afternoon shift at these locations. At the same time staffing was reduced through a voluntary severance scheme to leaving enough staff remaining only for a morning shift.</p> <p>Customer-facing information was not changed at this time.</p> <p>The objective is to confirm the future staffing makeup of [REDACTED] align the customer facing information with the ticket office staffing times.</p> <p>No ticket offices will be closed as part of this program.</p>
Where will the change take place?	This change will take place physically at stations and on digital media to reflect the schedule 17 hours.
Will our colleagues be impacted? (If yes, please provide a brief summary of why)	<p>[REDACTED]</p> <p>[REDACTED] ed which will focus on less shift work and more fix shifts.</p> <p>[REDACTED]</p>
Will our passengers be impacted? (If yes, please provide a brief summary of why)	<p>[REDACTED] will be a minor impact to customers.</p> <p>[REDACTED]</p> <p>[REDACTED]</p>

	The most visual impact will be the ticket office information which will change to correctly say the opening times of the ticket office. This will be updated at stations and on all digital platforms.
When is the expected completion date?	It is expected that this is completed by the end of October 2024.
Are there any other details you would like to share?	Considerations have been taken of the national ticket office consultation in 2023, and our own learning which showed the importance of protecting staffing. Separately, it is important to note that the criteria for a Major and Minor change under the TSA are different and therefore there was not a public consultation for these changes when they were approved in 2022.

3. Please review each of the protected characteristics below. How does this work impact people with protected characteristics?

For each category, there are some prompt questions to assist you with the sort of considerations that need

RAG rating	High Impact 3	Medium Impact 2	Low Impact 1
High Probability 3	9 High Impact expected	6 High Impact expected	3 Medium Impact expected
Medium Probability 2	6 High Impact expected	4 Medium Impact expected	2 Low impact expected
Low Probability 1	3 Medium Impact expected	2 Low Impact expected	1 Low Impact expected

to

be made.

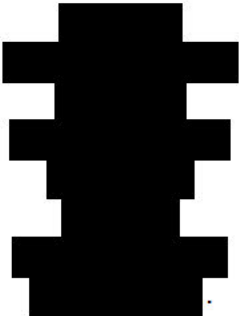
Please write your considerations in the white boxes below each protected characteristic. Then fill in the “RAG after mitigation” box with the corresponding colour and score.

Impacted Characteristics, Disability			
Consideration	Notes	Mitigation	RAG after mitigation
	<p>changes, we lost 10.6</p> <p>The station sold an average of 10 tickets in the affected hours per day.</p> <p>In 2023, during the national public consultation for proposals to close ticket offices under the Major Change Process of the TSA, a total of 19,918 people wrote in specifically for Southeastern.</p> <p>The vast majority of the replies in the 2023 consultation did not reference a specific station with their objections to closures.</p> <p>was not part of our first phase of ticket office proposals and therefore was not a part of the public consultation and hence does not have any data detailing the number of responses or objections it received.</p> <p>has had 20 customer complaints about lack of ticket office accessibility between March 2022 and March 2024</p>	<p>Alternative ticketing mediums are available such as Ticket Vending Machines and online tickets at this station, therefore, the proposed change will not limit access to ticket purchasing facilities.</p>	
Reduced access to station toilet facilities	<p>The is a waiting room in the booking hall, which is available when the station is staffed.</p> <p>Within the time frame of March 2022 – March 2024, there has been 1</p>	None Required	

Impacted Characteristics, Disability			
Consideration	Notes	Mitigation	RAG after mitigation
	<p>station sold an average of 6 tickets in the affected hours per day.</p> <p>In 2023, during the national public consultation for proposals to close ticket offices under the Major Change Process of the TSA, a total of 19,918 people wrote in specifically for Southeastern.</p> <p>The vast majority of the replies in the 2023 consultation did not reference a specific station with their objections to closures.</p> <p>not part of our first phase of ticket office proposals and therefore was not a part of the public consultation and hence does not have any data detailing the number of responses or objections it received.</p> <p>had 9 customer complaints about lack of ticket office accessibility between March 2022 and March 2024</p>	<p>Alternative ticketing mediums are available such as Ticket Vending Machines and online tickets at this station, therefore, the proposed change will not limit access to ticket purchasing facilities.</p>	
Reduced access to station toilet facilities	<p>There is a waiting room on the platform, which is available when the station is staffed.</p> <p>Within the time frame of March 2022 – March 2024, there has been 0</p>	None required	

Equality Impact Assessment (EqIA)

Consideration	Notes	Mitigation	RAG after mitigation
Changes to rosters and working patterns.	The majority of positions which would be changed are currently vacant.	[REDACTED]	
Increased working outside	Staff currently have duties outside of the ticket office which require them to go outside	All risk assessments will be updated including any relevant lone working risk assessments.	

Our Customers – Impacted Characteristics, Disability			
Consideration	Notes	Mitigation	RAG after mitigation
	<p>Ticket sales are very low at all these locations during the impacted hours</p>	<p>Alternative ways of buying tickets at stations remain with ticket vending machines.</p> <p>Cash is still able to be used with a cash ticket vending machine at each of these stations.</p> <p>In addition, customers can buy tickets online using mobile devices</p> <p>If any customers are unable to use any of the ways of buying a ticket at their station they should buy at their first opportunity during their journey.</p>	
<p>This change will see a reduction in the availability of ticket office only products such as the special disability fares.</p>	<p>Between March 2022 and March 2024 only special disability fare has been sold in the impacted hours between these two locations.</p>	<p>People who wish to buy these tickets can in the morning at these locations or buy at their first opportunity during travel.</p>	

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

Have you considered people impacted by socio-economic deprivation? Here is good place to acknowledge this.

This could have a positive impact on our staffing teams as it allows fixed shifts of either earlies only or part time which can help with fatigue management and work life balance. This should support our desire to increase our diversity and inclusive workforce with more jobs which are appropriate for people with childcare or other caring responsibilities.

This is in contrast to many of our other roles which require rotations around rosters which can mean it is more difficult to plan for events in their personal lives due to matching the rosters.

5. What information sources have you used and who have you engaged with to review the impacts on equality?

To gather the various data, we have drawn on:

- Ticket sales, (6 fully staffed weeks between September 2019 & October 2019)
- Staffing models,
- Assistance data, (Take from the Passenger Assistance App between December 2023 & May 2024)
- National consultation feedback, (Ticket office consultation between July 2023 and October 2023)
- Customer contact data (March 2022 – March 2024)

The core objection on the 2023 ticket office consultation was around a reduction in staffing, or de-staffing of stations. We are not proposing to de-staff any stations

At all station locations, customer service staff are planned with no reductions being made to staffing hours.

Early engagement with industry stakeholders, reinforced the importance of staffing which has been strongly considered.

6. How will you monitor the impact of your project/piece of work on equality once it has been put into effect?

Examples include, customer feedback, surveys, mystery shoppers, insights, twitter responses, footfall, increase in sales, increase in revenue, reduction in time, changes in footfall, internal review.

The impact of this will be monitored through customer contact, staff feedback, CSS data, SQR and recruitment data.

[REDACTED]

7. Is there anything else you would like to add?

The ticket offices are remaining open and staffed when they are used by passengers, and it is only right to ensure that we are matching passenger demand.

This change will help our people start to think differently about their roles and prioritise the customer service they are brilliant at giving rather than primarily being an underused sales point. This will be a beneficial mindset change for our passengers who will get a dedicated customer service expert to help them with their journeys.

8. After completing this EqlA, what is your decision?

An EqlA is outcome-driven, not process-driven and it is expected that projects may change if they highlight an unfair or disproportionate impact on a certain group. After completing the EqlA there are five possible outcomes;

- **Change the work** to mitigate against potential negative impacts found
- **Continue the work** because no potential negative impacts found
- **Proceed with caution** in the knowledge that this project may favour some people more than others (please provide justification for this decision)
- **Complete a more detailed EqlA** if the programme of work is complex/large scale change and requires a more detailed review
- **Stop the work** because discrimination is unjustifiable and there are no obvious ways to mitigate

EqIA author decision:				
Change the work <input type="checkbox"/>	Continue the work <input type="checkbox"/>	Proceed with caution <input type="checkbox"/>	Complete a more detailed EqIA <input type="checkbox"/>	Stop the work <input type="checkbox"/>
EqIA panel assessment (to be completed by the panel).				

Change the work	Continue the work	Proceed with caution	Complete a more detailed EqIA	Stop the work
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

9.What actions are required following the completion of the EqIA?

Action	By when?	By whom?

10.Submission

Please note, if anything changes that impacts the EqIA, this will need to be updated and resubmitted to the panel.

Once you have completed all sections of the EqIA and engaged relevant stakeholders, please ensure this document (along with any referenced evidence, relevant documentation or other items that you would like this document to be reviewed alongside) is signed off by your Line Manager or Department Head as well as the EqIA Panel. Please send your EqIA to [REDACTED]

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Appendix 1 – considerations

Age

- Have generational differences been considered?
- Are activities accessible for all ages?
- Have differences in learning and working styles been considered?
- Is the activity technology dependent? (e.g. are email addresses required?)
- Have the distances of any detours and stepped access been considered?
- Have different communication channels been considered?
- Will the changes impact any youth groups, schools, community groups etc?
- Is the project perpetuating stereotypes?

Disability and/or caring responsibilities

- Do the changes affect visual access? Colour blindness, zoom options, font sizes and colours etc.
- Have subtitles been considered? Audio Description?
- Is imagery representative?
- Have differences in learning styles been considered?
- Is travel required? Is travel accessible to all?
- Are there alternative accessibility options?
- Is a space accessible? Can spaces be altered?
- Are there any changes to lighting levels?
- Will there be any loud noises or flashing lights that may impact someone with neurological differences?
- Is the project perpetuating stereotypes?

Marriage or in a civil partnership

- What personal details do you need to take?
- Are titles/ relationship indicators necessary?
- Is the project perpetuating stereotypes?

Pregnancy and maternity

- Are there any hazardous substances or materials used?
- Is the project perpetuating stereotypes?

Race- Colleagues and customers from ethnic backgrounds

- Is there representative imagery?
- Will it impact people who do not have English as their first language?
- Has the language being used been considered? Should alternative formats be provided?
- Will there be any impacts on the community such as increases in rent/ gentrification?
- Is the project perpetuating stereotypes?

Religion or belief- Colleagues and customers with religions and/or beliefs

- Have various religious holidays been considered?
- Have any impacts to the community or place of worship been considered?
- Have cultural symbols been used? If so, are they being used accurately
- Has inclusive language been used?

- Is information available in various languages and formats relevant to the community?
- Is the project perpetuating stereotypes?

Sex and Gender Reassignment-

- Cisgender*, transgender and non-binary colleagues and customers
- *Cisgender is when you identify with the sex you were assigned at birth.
- Is the language used non-gendered? Have inclusive pronouns been used?
- Have representative demographics been used?
- Is the project perpetuating stereotypes?
- What personal details do you need to take? Have titles been used? If so, is there a variety for selection (Mr, Miss, Mx)
- Are there any changes to lighting or security which impact people who have had or are undergoing gender reassignment?

Sexual orientation- LGBT+ colleagues and customers

- Are there any changes to lighting or security which may increase vulnerability?
- Is there representative imagery?
- Is the project perpetuating stereotypes?

Appendix 2 - Glossary:

Assist – A recorded instance of assistance on the Passenger Assist App. While assistance recording is positive on the app not everyone uses it and therefore the real figure for passenger assists is likely to be higher.

MAS – Mobile Assistance Staff – Members of staff who are used reactively to provide assistance around the station and on and off of trains.

Period – A railway period made up of 4 calendar weeks.

SQR – Service Quality Regime – The DfT programme for ensuring high standards of cleanliness and attractive stations with useful up to date information.

TSA – Ticketing Settlement Agreement – The industry document which governs the products, availability and change procedures around ticket offices.

TVM – Ticket Vending Machine