TfL Management System

F1457 A2 Customer Equality Impact Assessment (EQIA) Form

The Equality Impact Assessment (EQIA) is a means by which we can demonstrate how we have considered inclusion and put people at the heart of the decisions and changes we make It is a tool to explore the potential for a service, project, programme, or business plan to have an impact on a particular protected characteristic, inclusion groups, or community. This includes the impact on one or more of these groups:

- Protected characteristic groups (as outlined in the Equality Act 2010)
- Disadvantaged or marginalised groups or communities
- Deprivation and socio-economic disadvantage within local communities

Please note:

To comply with our agreed policy on completing Equality Impact Assessment (EQIA) and meet our requirements under legislation, all new strategies, policies, business plans, change programmes or projects must be impact assessed before being introduced. Within this document, you will need to provide evidence to demonstrate:

- Consideration of the impact of your initiative for each protected characteristic and other disadvantaged groups and communities
- Assessment of the impact you have identified and a clear action plan to mitigate the issues and concerns which arise from this.

The steps for completing EQIA are:

- Introduction of aims/objectives/focus
- Gather evidence in relation to all relevant protected characteristics and inclusion groups
- Engagement and consultations consult and engage with relevant stakeholders/inclusion groups/communities and seek feedback
- Assess or identify potential impacts
- Act on the results including planning actions to mitigate potential negative impact
- Monitoring and evaluation
- Make the right decision based on the evidence and findings from the assessment
- Sign-off

Draft or completed customer EQIA should be submitted to Customer EQIA inbox and a superuser or member of the customer D&I team will be allocated to review the document. Please ensure you have read the customer EQIA guidance before using this form.

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Transport for London
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1. Key information and clarifying aims

Title of strategy, service, business plan, programme, or project	Withdrawal of Platform Tickets Unique ID No. (To be assigned by the D&I team) D&IC/22/458												
Team/Department/ Directorate	Tech & Data - Payments	Tech & Data - Payments											
EQIA author	Billy McConnachie												
Senior accountable person	Dale Campbell												
Date EQIA started	1 February 2023		Date EQIA completed										
Project Stage													
What is the focus of this EQIA?	Service Project		Programme Strategy or				Others (please state pelow)						
(Please tick which is appropriate)			X										
Who would benefit or be	impacted by your strategy, s	service, business	s plan, program	me, or pro	ject (Please pro	ovide	details of below)						
Customer	All customers who would usually pay £1 to access a station platform would no longer need to. This would save each customer £1. All customers would still need to request access to a platform, as they do now, so there would be no change to this, other than they would not have to pay £1. This proposal would save all customers money												
Employee (for workforce or employee only impact assessment, please email the D&I workforce team at EQIA @tfl.gov.uk)	There will be no direct impact on staff. Staff will be briefed ahead of time.												
	As part of a wider and ongoing piece which are available as magnetic-st				_		• •						

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Provide background information and outline the aims/objectives/scope of the strategy, service, business plan, programme, or project

By doing this there will be a variety of benefits to the business, and customers, which includes cost savings for both, as well as having a positive environmental impact. It would also align us with the direction the rest of the industry is heading and support the Department for Transport in their initiative for a paperless ticket offering. As our ticket offering evolves, we want to make sure we are being inclusive by bringing our customers along on our journey.

Background

Platform tickets are a legacy item and were introduced many years ago to allow customers, who would not be making an onward journey, access to station platforms. Tickets are issued at station ticket machines and cost £1. They do not operate station gates and customers are required to show their ticket to a member of staff to gain access to the platform.

Today, typically, according to feedback from London Overground and Elizabeth line, these tickets are mostly bought by train enthusiasts and ticket collectors. Occasionally, they are also bought for the intended purpose of people wanting to escort someone to a train.

There are no reports of customers abusing Platforms tickets i.e. using them to gain access to stations for onward travel.

There has been a significant decline in sales of Platform tickets since the pandemic, with pre-covid figures in 2018/19 of 35,301 compared to post-covid sales in 2020/21 of 313. In 2021/22 there was an increase to 1599, which is attributed to customers visiting new stations Nine Elms and Battersea Power Station on their respective opening days. Latest figures show that only six tickets in total have been bought at these two stations combined.

If the ticket were to be withdrawn it would be planned as part of a fare revision activity. This would mean that no additional costs would be incurred and no additional budget would be needed.

The withdrawal of this ticket would also support the Department for Transport's initiative for paperless ticketing, something TfL has been working towards for a number of years.

Savings in costs

There would be savings in costs, made up from:

- Reduction in ticket stock
- Reduction in mechanical wear and tear on ticket machines
- Reduced cash handling
- Reduction in 'call-outs' for maintenance

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Benefits for customers

• Customers would save money, as they would no longer have to pay £1 to access a station platform. Customers would still be able to access a station platform for legitimate reasons.

Environmental impact

There would be a positive environmental impact because of the reduction in this paper-based medium. This supports TfL's vision of being a strong, green heartbeat for London.

Data

Although TfL does not actively capture data (income or age, gender, and other protected characteristics) on who buys our products, feedback from station staff suggests that the majority of platform tickets are bought by train enthusiasts and ticket collectors. There has been a significant decline in sales of Platform tickets since the pandemic, with pre-covid figures in 2018/19 of 35,301 compared to post-covid sales in 2020/21 of 313. In 2021/22 there was an increase to 1599, with some of the increase attributed to customers visiting new stations Nine Elms (194 ticket sales) and Battersea Power Station (247 ticket sales) on their respective opening days. Latest figures show that only six tickets in total have been bought at these two stations combined. In financial year 2022/23 a total of 1477 platform tickets were sold across all stations.

Communication

As part of mitigation, we would ensure staff are briefed ahead of the withdrawal of this ticket.

Mitigation

Currently, customers need to pay £1 for a ticket and then speak to a member of staff to gain access to a platform. Customers would still need to speak to a member of staff to gain access to a platform. Ensuring staff are fully briefed about the changes should mitigate this change, should the proposal go ahead.

TfL already offers a number of options (<u>Transport accessibility - Transport for London (tfl.gov.uk)</u> to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.

The only change would be – customers would no longer need to pay £1 to access a platform.

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Title: Customer Equality Impact Assessment (EQIA) Form Document No.: F1457

Issue No.: A2

2. The Evidence Base

Consider evidence in relation to all relevant protected characteristics and inclusion group listed in the table below. Please note that change always disproportionately impacts all protected characteristics, so there should be no blank boxes. Consideration should be given not just to the proposal impact but how you intend to communicate and engage on the proposed change.

Protected Characteristic and inclusion group

Data and evidence to support your assessment (Record here the data you have gathered about the diversity of the people potentially impacted by this work. Please include any research on the issues affecting inclusion in relation to your work).

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Age	According to the TfL document " <u>Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)</u> ", older Londoners are more likely to live in low-income households, are likely to cite affordability as a barrier to transport and more likely to use buses than the Tube. There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should age be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Disability (please consider all forms of disabilities)	According to the TfL document "Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)" disabled Londoners are more likely to live in low-income households. One in three families in London with a disabled child live in poverty. One of the reasons for this is the higher cost of supporting a disabled child. In some cases, it can be three times more expensive to bring up a child with an impairment.
	There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should disability be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. Feedback from IDAG says that the withdrawal of a paper ticket is a positive.
Sex (male, female, non- binary and other identities)	According to the TfL document "Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)" half of Londoners are women (51 per cent).
	There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should sex be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Gender reassignment	There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should gender reassignment be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Marriage/civil partnership	According to Civil Partnerships in England and Wales - Office for National Statistics (ons.gov.uk) London is home to the largest proportion of civil partnerships in England and Wales; 38 per cent of civil partnerships formed in 2016 were in the Capital. There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should marriage/civil partnership be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.

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Pregnancy/maternity	There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should pregnancy/maternity be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Race	According to the TfL document " <u>Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)</u> " BAME Londoners are more likely to live in low-income households, are likely to cite affordability as a barrier to transport and are more likely to use buses than the Tube. There is no evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should race be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Religion or belief	According to the TfL document " <u>Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)</u> " BAME Londoners are significantly more likely than white Londoners to cite religion/belief as the perceived motivation for incidents of hate crime. There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should religion/belief be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Sexual orientation	LGBTQ Londoners have reported hate crime as their major concern in relation to transport. There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should sexual orientation be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Disadvantaged, inclusion groups and communities e.g., carers, refugees, low income, homeless people etc.	According to the TfL document "Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)", Londoners on low incomes tend to be women and older, BAME and disabled people and those not in work. Low income largely reflects working status, though the underlying causes may be tied to the cost of housing, childcare and transport as well as access to education, qualifications, and health. More children living in poverty are part of low-income working families than are in workless families. Londoners on low incomes are more likely to use buses than the Tube.

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	There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should carers, refugees, people on low income, homeless people etc. be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.
Deprivation and socio- economic disadvantage of local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income	According to the TfL document "Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk)", Londoners on low incomes tend to be women and older, BAME and disabled people and those not in work. Low income largely reflects working status, though the underlying causes may be tied to the cost of housing, childcare and transport as well as access to education, qualifications, and health. More children living in poverty are part of low-income working families than are in workless families. Londoners on low incomes are more likely to use buses than the Tube. There is no specific evidence to indicate that this particular cohort would be impacted by this change but it's reasonable to assume that, should age be a factor, that the change would be positive, as customers would no longer have to pay £1 to access a platform. There would be no other change.

3. Engagement and consultation

Outline how engagement and consultation with inclusion groups, people who share a protected characteristic, and other project teams have informed your work

	Yes	No	Don't Know	Comments
Has there been any engagement or consultation				In May 2022 TfL engaged with London Travelwatch, who did not
activity relating to this strategy, service,				raise any objections or concerns.
business plan, programme, or project?	x			The Independent Disability Advisory Group expressed that using ticket machines in general can be problematic from an accessibility perspective and welcomed the withdrawal of magnetic-stripe paper tickets.
				London Underground, and TfL managed concessions MTR Elizabeth line and London Overground have raised no objections to the proposal.

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	Yes	No	Don't Know	Comments	
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_				d/engaged or intend to consult/engage with below.	
Please include any relevant consultation or eng	agem	ent u	ındertaken pi	rior to completing this EQIA which relates each	
protected characteristic and inclusion group.					
Stakeholders and inclusion groups		Date	•	Feedback comments / issues raised	
consulted/engaged with					
London Travelwatch		2	27 June 2022	London Travelwatch did not raise any objections or concerns.	
The Independent Disability Advisory Group		23 June 2022		Feedback from IDAG is that paper-based tickets cause problems fo people with disabilities and welcomed the proposal.	
Head of CO Strategic Delivery & Change		19 June 2023		Does not oppose the withdrawal of platform tickets	
LU Revenue Control		28 April 2023		Agree fully to withdraw	
	Yes	No	Don't Know	Comments (state clearly what this engagement or consultation will be and how it will be organised)	
Does there need to be any further engagement				Reaffirm with London Underground, MTR Elizabeth line and London	
or consultation? If yes, please add this as an				Overground of the planned change. Update staff via Fare Revision	
action to the action planning section below.				briefing.	
Please note that in some circumstances your				Reaffirm with London Travelwatch of the planned change, as per	
work may require formal consultation				previous discussion.	
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4. Impact assessment – Protected characteristics and inclusion groups

Given the evidence listed in section 2 and 3, consider and describe the potential impacts this work could have on people with protected characteristics and other inclusion groups.

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	- · ·						Issue No.
	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Race and ethnicity		Х				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for as ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.
Sex (male, female, non-binary and other identities)		Х				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for as ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.
Gender reassignment		X				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for a ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.
Age		Х				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for a ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform.

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		1 _				1	Issue No
	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.
Religion and belief		х				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for a ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.
Disability (please consider all forms of disabilities)		х				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for a ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.
Sexual orientation		Х				х	The change is likely to have little or no impact on all protected characteristic and inclusion groups. Additionally, customers who currently pay £1 for a ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are

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		1	I		T	T	Issue No
	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please
							include actions to mitigate the potential negative impact for
							this protected characteristic)
							encouraged to offer help to anyone who looks like they might
							need assistance.
Marriage or civil		Х					The change is likely to have little or no impact on all protected
partnership							characteristic and inclusion groups. Additionally, customers
							who currently pay £1 for a ticket to gain access to a platform
							would no longer need to pay £1 to gain access to a platform.
						X	TfL offers a number of options to customers who need
							assistance to platforms. These include "Turn up and go" and
							the Passenger Assist booking program. All staff are
							encouraged to offer help to anyone who looks like they might
							need assistance.
Pregnancy and maternity		Х					The change is likely to have little or no impact on all protected
							characteristic and inclusion groups. Additionally, customers
							who currently pay £1 for a ticket to gain access to a platform
							would no longer need to pay £1 to gain access to a platform.
							TfL offers a number of options to customers who need
							assistance to platforms. These include "Turn up and go" and
							the Passenger Assist booking program. All staff are
							encouraged to offer help to anyone who looks like they might
							need assistance.
Disadvantaged, inclusion		Х					The change is likely to have little or no impact on all protected
groups and communities		^					characteristic and inclusion groups. Additionally, customers
-							who currently pay £1 for a ticket to gain access to a platform
e.g., carers, refugees, low income	,						would no longer need to pay £1 to gain access to a platform.
homeless people etc							TfL offers a number of options to customers who need
							assistance to platforms. These include "Turn up and go" and
							the Passenger Assist booking program. All staff are
							encouraged to offer help to anyone who looks like they might
							need assistance.
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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please
							include actions to mitigate the potential negative impact for
							this protected characteristic)
Deprivation and socio-		Х					The change is likely to have little or no impact on all protected
economic disadvantage of							characteristic and inclusion groups. Additionally, customers
local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income							who currently pay £1 for a ticket to gain access to a platform would no longer need to pay £1 to gain access to a platform. TfL offers a number of options to customers who need assistance to platforms. These include "Turn up and go" and the Passenger Assist booking program. All staff are encouraged to offer help to anyone who looks like they might need assistance.

5. Action planning

List all planned actions - actions which could help mitigate any potential negative impacts. Additionally, please remember to include in your plan any 'positive action'.

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			ISSUE NO.
	Actions	Owner	Deadline
1	Reaffirm the action with London Underground,	Payments	August 2023
	MTR Elizabeth line ahead of action		
2	Include changes in Fare Revision staff briefing	Payments	August 2023
3	Reaffirm the action with London Travelwatch of the planned change	Payments	August 2023
4			
5			
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6. Monitoring and evaluation

Detail how you will or plan to monitor and evaluate the success of the mitigation actions and the overall impact of your decision or proposal

1.	How would you monitor and evaluate the success of the mitigating actions once your proposal has been implemented?	Feedback from London Overground, MTR Elizabeth line and London Underground
2.	How would you monitor the actual impact of your proposal or decision once your proposal has been implemented?	Feedback from London Overground, MTR Elizabeth line and London Overground

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7. Decision-Making

Based on the above assessment, please select one of the options below that describe what you propose to do next. It is important that you provide the reason(s) for your decision and the evidence that supported these reasons.

1	Continue with your work because the assessment demonstrates that the work will have no potential negative or adverse impact on equality and inclusion groups.	Platform tickets are not active tickets and do not operate the gate line, hence anyone buying a platform ticket would need to show a member of staff the ticket to gain access to a station platform. Withdrawing the platform ticket, while retaining the process that customers can access platforms for legitimate reasons, will no longer have to pay to access a platform. It is considered that this would not have any potential negative or adverse impact on equality and inclusion groups. TfL will continue to offer its "Turn up and go" and "Passenger Assist" programs for anyone who needs help and assistance.
2	Justify and continue with your work despite negative equality impacts, and because there are other factors which make it reasonable for you to decide to continue with your work.	
3	Change or adapt your work to ensure it does not adversely or disproportionately impact certain groups of people, communities, or miss opportunities to affect them positively	
4	Stop your work because there is a high probability of noticeable discrimination and negative impacts which cannot be objectively justified. Further research work may be needed.	

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8. Sign off

EQIA author			
Name:	Billy McConnachie		
Title:	Product Manager		
Date:	01/02/2023		
Signature	BMc		
EQIA reviewer (superuser or D&I team)			
Name:	Nicholas Zikpi and Remi Osimade		
Title:	EQIA team		
Date review completed:	28/02/2023		
Signature	NZ/OO		
D&I team representative			
Name:			
Title:			
Date:			
Signature			

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EQIA signed off by (Senior accountable person)

The EQIA should be signed off by a senior accountable manager or senior project sponsor. They are ultimately responsible for ensuring that the EQIA requirements are taken onboard and delivered as part of the project deliverables and/or escalated to the decision-makers where necessary. By signing, they are confirming that the equality impacts have been identified, understood, and considered; those affected by the proposal/decision have been involved or consulted; and there are plans to mitigate any potential negative impact and monitor the actual impact of the proposal/decision after implementation.

•	
Name:	Dale Campbell
Title:	Head of Revenue Analysis
Date:	17.07.2023
Signature	

Document history and version control

Document	Version	Date	Summary of changes
history	0.1	01/2/2023	First draft
	0.2	21/6/23	Changed acronyms LU, MTR, LO to London
			Underground, MTR Elizabeth line, London
			Overground. Updated section 3. Updated section 4.
	0.3	17/07/23	Updated benefits to customers section. Updated
			sales figures data. In "engagement and consultation"
			section, added that MTR Elizabeth line and London
			Overground are TfL managed concessions.

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Transport for London (TfL), its subsidiaries and service providers, will use your personal information for the purposes of assessing Customer Equality Impact and administration. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. We will not use your data for marketing purposes. For more information on how TfL processes your personal information please visit www.tfl.gov.uk/privacy

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