

# **Review of London TravelWatch**

September 2010





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# London TravelWatch Review Working Group

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On 24 March 2010, the Assembly's Business Management and Administration Committee established a working group to undertake a review of London TravelWatch and submit a report to the Committee for consideration. The terms of reference of the review were:

- To undertake a detailed examination of the functions, resources and performance of London TravelWatch;
- To examine the role of London TravelWatch and its relationship with other relevant bodies, including the London Assembly Transport Committee, and, where appropriate, to benchmark its various functions against the operation and performance of other comparable organisations as appropriate; and
- To make recommendations intended to improve the economy, efficiency and effectiveness of London TravelWatch.

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# Executive Summary

The proposals in this report, if implemented in full, would bring to an end the provision of a separate body with a remit to represent public transport users in London. We do not make this proposal lightly. We recognise that for the last 60 years there has been a separate body in some form or other which has had such a remit.

However, we do not believe that the current arrangements fully reflect the devolution settlement in London established in 2000. Similarly, at a time of a major retrenchment in public finances, it is incumbent on the Assembly to examine its £1.6 million annual expenditure on passenger representation and challenge robustly the extent to which it provides value for money and does not fund activity duplicated elsewhere.

We conclude that spending on this scale can no longer be justified. We demonstrate in this report that large parts of London TravelWatch's work involves systems or functions which are replicated at a national level by the rail passenger body, Passenger Focus, or by the Assembly itself. Other parts of its work, in our view, do not represent value for money and should not continue to be undertaken.

Our proposals would ensure that London's passengers would continue to have a right of appeal if they are unhappy about the way their complaints have been dealt with by transport operators. We would also ensure that passengers' views are reflected in the major consultations about issues which affect them. This report sets out ways in which these functions can continue to be delivered but under new models of delivery which would remove the need for expensive separate back-office functions and which take advantage of the economies of scale offered by existing organisations.

In doing so, we estimate that annual savings of up to £1 million could be made. Passengers' interests can continue to be represented and responsibility for ensuring this happens would lie with a body which is directly elected by and accountable to them.

We recognise these proposals require legislative change and we urge government and parliament to take the necessary steps to enable this to happen. In the meantime, in our analysis of London TravelWatch's operations, we set out steps which we think should be taken to realise savings at the earliest possible opportunity. We also make

contingency plans to maximise efficiencies should the legislative change we believe is necessary is not forthcoming.

London TravelWatch describes itself as “the voice of London’s transport users”. We believe the proposals in this report would ensure that this voice continues to be heard and in a way which can demonstrate value for money and is fully accountable to those who use public transport in the capital.



# Introduction

It has been ten years since the creation of the Greater London Authority (GLA). Inevitably this anniversary has led to some discussion of the respective roles and achievements of the directly-elected Mayor and the Assembly. In some areas, these discussions have led to a consensus for change which would develop the devolution settlement with London and increase transparency and accountability. In the current financial climate there is also a renewed focus on reducing public expenditure by stream-lining processes and reducing bureaucracy. It is in this context that we examine in this report the Assembly's responsibilities in relation to London TravelWatch, the operating name of the London Transport Users Committee.

The Assembly agreed to carry out this review in February 2010.<sup>1</sup> It agreed a motion which stated:

“This Assembly believes that the upcoming tenth anniversary of London TravelWatch represents an excellent opportunity for the Assembly to set up a cross-party review to look into its costs and procedures in order to ensure that it is best placed to deliver value for money and serve passengers’ needs effectively over the next ten years.

We further resolve that the Business Management and Administration Committee be delegated the setting of precise terms of reference and membership of the review panel.”

This panel was subsequently appointed by the Assembly's Business Management and Administration Committee to carry out the review on its behalf.<sup>2</sup> In doing so, we have consulted more than 35 organisations which work and liaise with London TravelWatch and held discussions with the Chair of the Board and representatives of Passenger Focus. We are particularly grateful for the co-operation of the staff of London TravelWatch during what we recognise has been an unsettling period.

We set out in this report proposals for how passengers might be represented in the future and a radically different model for delivery. In doing so, we have taken account of the history of such

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<sup>1</sup> See item 11, Minutes of London Assembly (Mayor's Question Time) 24 February 2010

<sup>2</sup> See item 11, Minutes of the Business Management and Administration Committee, 24 March 2010

representation and the importance of a settlement for London which reflects the size and complexity of the transport system in the capital.

The first chapter of the report looks at how London TravelWatch is constituted and the Assembly's statutory functions in relation to it. As we show in this chapter, London TravelWatch has evolved over decades inheriting statutory functions and adapting to different models of transport provision and London government. We argue in this chapter that this process of evolution has not produced a governance structure which reflects the current devolution settlement and the role of the Assembly. There is an opportunity, through legislative change, to increase accountability and transparency while saving taxpayers' money.

In the second chapter we examine in more detail the functions and duties of London TravelWatch and how they are currently fulfilled and resourced. We analyse this work with a view to removing duplication and focussing resources on what we consider to be its core functions. We make recommendations to change the way functions are carried out and, in some cases where we believe they do not represent value for money, to cease doing them altogether. Subject to any decisions made as part of the national review of Non-Departmental Public Bodies, we also look at commissioning work from Passenger Focus, which currently has an overlapping remit in relation to rail services serving the capital.

Taken as an overall package, this report sets out a way forward for the governance of passenger representation in the capital and the role of the Assembly. How this is delivered will, of course, depend to some extent on the views of central government, Parliament and ultimately the passage of the relevant legislation.

We believe the realisation of this vision can deliver significant savings and enhance the way London's passengers are represented. It is not our intention that the Assembly and London TravelWatch itself should wait for legislative change. We propose that, subject to the endorsement of the proposals in this report by the Assembly, work is taken forward at the earliest opportunity to implement the changes as far as possible within the existing legal framework and deliver the savings identified. We look to the board and staff of London TravelWatch to play an important part in that process.

The size and timing of the potential savings from these proposals are contingent on a number of unknown factors including the progress of legislative change; the outcome of the national review of NDPBs and any subsequent agreement between the Assembly and Passenger Focus about commissioned services; the availability of accommodation within City Hall; and the one-off costs associated with staffing changes which will be dependent, in part, on the application of the Transfer of Undertakings (Protection of Employees) Regulations. Appendix 1 to this report therefore discusses in more detail the potential savings from the proposals discussed in this report. Appendix 2 summarises the current allocation of London TravelWatch's budget and a brief summary of its historical spending since 2000.

# Governance: how are London's passengers represented?

## **A brief history of passenger representation in London**

An understanding of how passenger representation in London has changed and developed, and how we have got to where we are now, is important in developing proposals for the future.<sup>3</sup> The origins of London TravelWatch can be traced back over 60 years to the time of the nationalisation of parts of the public transport network under the post-war Labour government. Therefore, although this review has taken place during the tenth anniversary of London TravelWatch in its present guise, the Assembly's involvement is relatively recent in terms of the history of passenger representation in London.

The creation of the state-owned British Transport Commission in 1947 was accompanied by a system of national and regional advisory committees set up to represent the public interest. This mirrored arrangements in other nationalised industries. Appointed by the government, its members represented sectional interests, such as local government and industry.

The capital was represented by the Transport Users Consultative Committee for London which had a duty to consider and make recommendations relating to matters brought to its notice by users, transport providers or which it considered merited investigation. This responsibility has remained broadly unaltered and is part of London TravelWatch's statutory remit today. What did change over the following decades was the extent of the representative body's geographical and modal remit; responsibility for its appointment and remuneration; and, on several occasions, its name.

These changes were invariably driven by changes to the way transport was run and by the way London was governed. By the 1970s, a London Transport Passengers Committee existed which was appointed and funded by the Greater London Council (GLC) and staffed by its officers. Its role was to represent passengers of London Transport services but not those of the then nationalised railways who were separately represented at a regional level by one of a nationwide network of regional committees.

The abolition of the GLC saw responsibility for appointment and remuneration revert to central government but also saw for the first

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<sup>3</sup> The source for the history of passenger representation in London in this chapter is a summary of the statutory basis of London TravelWatch provided by one of its officers.

time a representative body, the London Regional Passengers Committee, which could recruit and appoint its own staff. The Committee's remit covered London Transport's passengers and those of British Rail in and around the capital.

On the creation of the Greater London Authority in 2000, the London Assembly assumed responsibility for the passenger representative body in the capital which was renamed the London Transport Users Committee (LTUC). LTUC inherited the functions of its predecessor body, which itself had developed over the years, and had its remit extended to all of the activities of Transport for London other than freight. This included parts of the road network and with it a duty to take particular account of the needs of pedestrians and cyclists. LTUC adopted the operating name London TravelWatch in 2005/06.

There have subsequently been further relevant developments in passenger representation at a national level. Although it did not change the arrangements in London, the Railways Act 2005 abolished regional rail passenger representative groups outside the capital. The national body reconstituted at the time, which operates under the name Passenger Focus, has representatives on its board nominated by the devolved administrations in Scotland, Wales and London. London remains the only part of the UK with a multi-modal regional passenger representative body with its own staff and budget.<sup>4</sup>

Discussion of passenger representation in London would not be complete without a recognition of the role of the numerous ad hoc groups which have developed to campaign on particular local issues. These groups operate on an entirely voluntary basis but play an important role in representing passengers' views. Many responded to our survey and we are grateful for their views.

### **Passenger representation in the capital today**

The evolution of passenger representation in the capital over the last 60 years explains the complex legal framework which governs London TravelWatch and, in some respects, the somewhat anomalous arrangements in relation to the rest of the UK. The result has been a body with responsibilities which have developed from those of

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<sup>4</sup> In 2005 the Scottish Executive established a Public Transport Users Committee (known as Passengers' View Scotland) to advise Ministers. The Committee is supported by staff from within the Scottish Executive and it does not have a separate budget.

predecessor bodies. Furthermore, as new services have been introduced and responsibilities added, in our view, there has not always been sufficient assessment of the overall role of the representative body, what it is set up to do, and how and to whom it should be accountable.

The current arrangements would be difficult to explain or justify if one were to set up a new representative body today from a blank sheet of paper. For example, the consequences of the changes introduced by the Railways Act 2005 are that there are now two passenger representative bodies with a statutory remit covering London's main line rail services.<sup>5</sup>

**Perhaps most importantly in the history of passenger representation in London, the current representative body is, for the first time, the responsibility of a body which itself fulfils a representative rather than an executive function. The London Assembly is directly elected by, and accountable to, Londoners; crucially it does not have executive responsibility for transport. We believe this a highly significant consideration in an analysis of the governance of London TravelWatch and in measures to address the weaknesses in the current governance arrangements.**

### **An arms-length body?**

While its remit and functions are derived largely from transport legislation, it is the Greater London Authority Act 1999, as amended, [the GLA Act] which governs the relationship between London TravelWatch and its sponsoring body, the London Assembly.<sup>6</sup> The GLA Act clearly establishes London TravelWatch as an arms-length body. The Assembly is required to appoint a Chair and board whose members cannot be drawn from the Mayor, Assembly or Transport for London. The London Assembly may make arrangements to provide London TravelWatch with accommodation and must provide it with funds to appoint its own staff.

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<sup>5</sup> The London Transport Users Committee – operating as London TravelWatch – and the Passengers Council – operating as Passenger Focus – both have duties in relation to London rail services under the Railways Act 2005.

<sup>6</sup> Sections 246-252 and schedule 18 of the GLA Act relate to the London Transport Users Committee

The principle of arms-length appointed bodies is a well-established one in UK government though one which is arguably coming under some scrutiny by the current administration. An obvious parallel with London TravelWatch is the national rail passenger representative body, Passenger Focus, which is funded by the Department for Transport and whose board is appointed by the Secretary of State. The main argument for such arms-length bodies is that the executive should not have direct control over representative bodies which may, from time to time, seek to criticise the executive on behalf of those it represents.

The crucial difference in London, in our view, is that the Assembly is not an executive body delivering transport services. It is quite appropriate that the Mayor and Transport for London should be precluded from serving on the board of London TravelWatch given their responsibilities for transport in the capital. The argument for excluding members of the London Assembly, we believe, is far from clear.

Staff and board members from London TravelWatch expressed concern to us during the review about the relationship between it and the Assembly and the inherent tensions this brings. We acknowledge some of these concerns. For example, the Transport Committee of the Assembly is responsible for appointing London TravelWatch's board, allocating its budget and overseeing its performance. At the same time, the Transport Committee itself seeks to represent the views of all Londoners, including passengers, and may at times reach different conclusions on the same issue from London TravelWatch.

This is not a governance model which stands up to close scrutiny but in seeking to revise it a more fundamental issue in terms of the relationship between the two bodies is inevitably raised. For example, the Assembly's various responsibilities for London TravelWatch could, in theory, be delegated to different Committees: the Business Management and Administration Committee could take responsibility for appointing board members; the Budget and Performance Committee could take responsibility for allocating the budget and monitoring performance.

Such changes we believe would simply provide a fig leaf for the more pressing governance problem both organisations face. The Assembly is a small body of only 25 elected members. Its members sit on a number of different committees. Any division of the Assembly's

responsibilities in relation to London TravelWatch between committees would therefore inevitably be somewhat artificial. It would still leave hanging what we conclude to be the central question raised by the current arrangements: why is the Assembly with its democratic mandate and accountability to the London electorate delegating responsibility for representing passengers' views to a body of appointed individuals? And ultimately therefore, do we need a separately constituted independent body representing passengers?

Similar questions are being asked by the Mayor at the moment in terms of his relationship with bodies such as the London Development Agency (LDA). He is proposing that the LDA is folded into the GLA and ceases to operate as a separate body. This would, in the Mayor's view, "improve accountability and transparency" and be "more cost effective given the increasing pressure on resources".<sup>7</sup> We believe similar benefits would accrue from the folding in of London TravelWatch within the Assembly.

The argument against this is likely to be that the Assembly needs to represent all Londoners and not just the interests of passengers. For example, the interests of businesses and passengers may at time conflict. However, if the Assembly were to retain the statutory functions in relation to London TravelWatch it would be incumbent on it to make special provision to ensure the passenger voice is heard. In our view, it does not need a separate organisation with all the cost and bureaucracy that this entails.

Similarly, we do not accept the argument that London TravelWatch has a legitimacy derived from its non-political structure. First, we believe that that credibility of a passenger body derives from the strength of its evidence base regardless of who promotes the work. Secondly, it is inevitable that many of the people who put themselves forward for a role on the board have a political background. The board may not be party political but then neither are the cross-party conclusions of the Transport Committee. In short, we believe the capital's transport users would prefer to be represented by politicians they can elect or reject rather than those who are appointed.

**We therefore believe that there is a compelling argument for the London Assembly to take on the functions and duties of**

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<sup>7</sup> The Mayor of London's Proposals for Devolution, June 2010, p 13



**London TravelWatch. One relatively straightforward way of doing this would be to remove the legal restriction on Assembly Members sitting on the board of London TravelWatch. Assembly Members would provide a direct line of accountability to London's electorate. This would open up the potential for a comprehensive reconfiguration of the way passengers in London are represented. Such a reconfiguration would, we believe, reduce bureaucracy, channel resources to where they are most effective and ultimately deliver a better model of passenger representation for less money.**

#### **Proposal 1**

**We propose that London TravelWatch should not remain as a separately constituted organisation and its functions and duties in relation to the representation of the capital's public transport users be vested in the elected London Assembly. We further propose that discussions to this end, and any necessary legislative changes, are taken forward with the relevant government departments during the autumn. As an interim measure, it is proposed not to reappoint the six positions on the board which will become vacant in December 2010.**

As well as enhancing accountability, this proposal would save money both indirectly in terms of demands on staff time and directly in terms of member costs.

We welcome the work of the current chair of London TravelWatch, Sharon Grant, in reducing the number of board meetings from 13 to six per year with reduced agendas and fewer information items. More work is now carried out by the Board's committees on fares and ticketing; consumer affairs; access to transport; and transport services.

As a separately constituted body, the board inevitably though generates its own bureaucracy. An important part of the work of staff at London TravelWatch is to produce papers and service meetings of the board and its committees. Even under the revised structure there

are around three meetings each month<sup>8</sup> serviced by two committee administrator posts.

We envisage that under these new arrangements the board of Assembly Members would only expect to meet quarterly to make decisions about the work programme and monitor budgets and performance. The output would be reported to and considered by the Transport Committee as part of its ongoing work. This would reduce the demands on committee administration which we quantify in the following chapter on shared services.

The annual gross cost of the chair and board was £106,000 in 2009/10. This is made up of £26,000 for the Chair (including on-costs), £63,000 for the rest of the board (including on-costs) and £18,000 for a member of the board who is also appointed by the Assembly to sit on the board of Passenger Focus.

**Under our proposal, Assembly Members would take on the functions of the London TravelWatch board as part of their normal duties and without further remuneration. There would therefore be a direct overall annual saving of £80,000 to £98,000 per annum.**

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<sup>8</sup> See calendar of meetings at <http://www.londontravelwatch.org.uk/diary.php>

# Back office functions and the potential for shared services

In this chapter, we examine the back office functions which support the work of London TravelWatch with a view to identifying savings through shared services. This is in line with the Mayor's latest budget guidance which advises that "a particular priority [when identifying savings] is to optimise the efficiencies that are capable of being generated across the GLA Group from co-operating with others, outsourcing, partnerships and shared services".<sup>9</sup>

## Accommodation

London TravelWatch's single largest item of expenditure, excluding staffing costs, is its accommodation. The organisation occupies two floors of office and meeting space near the Barbican. The total cost of this accommodation in 2009/10 was £203,000.

The organisation has been successful in driving down the costs of this accommodation in recent years. As well as negotiating a competitive rent with a capped service charge at its last rent review, it successfully challenged its rateable value in 2008/09 and last year found savings of 25 per cent in its insurance costs. Accommodation costs continue to account for around 12 per cent of London TravelWatch's total expenditure.

In the early years of the Assembly, it agreed that what was then still referred to as the London Transport Users Committee should be provided with funds to secure its own accommodation.<sup>10</sup> It was argued at the time, and continues to be the strongly-held view of the London TravelWatch board, that having accommodation separate from the GLA is an important symbol of its independence.

We believe continued expenditure of this scale on separate accommodation for London TravelWatch can no longer be justified. We therefore believe that regardless of the outcome of any legislative changes to London TravelWatch, its staff should be provided with office space in City Hall.

While we recognise that any offer of accommodation would be subject to Mayoral approval and the availability of space, the potential savings to the GLA from sharing accommodation are significant and options should therefore be pursued as soon as possible.

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<sup>9</sup> The Mayor's Budget Guidance for 2011/12, para. 2.4

<sup>10</sup> See, for example, London Transport Users Committee accommodation, Transport Committee, Report no. 11, 2 July 2002

Co-location also opens up opportunities for further savings through other shared services. London TravelWatch is in a lease with its current landlord which cannot be broken without mutual consent until August 2012. Accommodation savings may not therefore be deliverable before 2012/13 subject to discussions with London TravelWatch's landlord. Nevertheless, in order to maximise the savings from other shared services as soon as possible, co-location should be taken forward in advance of any negotiations over the current lease.

#### **Proposal 2**

**We propose that the staff of London TravelWatch be re-located to City Hall as soon as is practical, and by the latest April 2011, and that negotiations should be started with the current landlord with a view to realising savings in accommodation costs from the earliest possible date.**

#### **Other shared services**

Further potential savings could be realised through the sharing of back office functions. Many of the functions currently delivered by staff at London TravelWatch are similarly provided for the GLA from within City Hall; others would no longer be required if London TravelWatch staff were re-located to City Hall.

The table below sets out the staff costs of the areas where there is currently duplication of provision and which should be considered for shared services.

<b>Function</b>	<b>Staffing cost</b>
Committee administration	£65,000
Communications	£77,000
Financial control, personnel and premises management	£175,000
Corporate management	£144,000
<b>Total</b>	<b>£461,000</b>

Source: London TravelWatch Business Plan and Budget Bid 2010-11

The scale of the savings from sharing these services will depend on the progress of the proposals to legislate to give the functions and duties relating to passenger representation in the capital directly to the Assembly. For example, a folding in of London TravelWatch to the Assembly would enable an integration of management functions and economies of scale across the range of its work.

Other savings can be achieved within the existing legislative framework and would be facilitated by co-location at City Hall. We estimate that a simple sharing of finance, human resources and committee administration functions with the GLA would generate savings in staffing costs for support functions in the region of £200,000 per annum. A more fundamental folding in of London TravelWatch to the London Assembly increases the potential for savings to around £400,000 per annum because of the additional potential to share management and communications functions.

The timing and size of any savings will depend on the details of the services which are shared and the restructures which would be required within existing GLA teams when the current staff of London TravelWatch are transferred across. London TravelWatch employees who are wholly or mainly attached to the functions that would transfer from London TravelWatch to the GLA may transfer under the Transfer of Undertakings (Protection of Employees) Regulations 2006 ("TUPE"). Our savings targets are therefore estimated over a two year period.

**We believe that it is not a good use of public money to fund separate human resources, committee services, communications, finance and corporate management functions to support London TravelWatch. There are substantial savings which could be made by absorbing these functions within the GLA and some of these can be taken forward regardless of whether London TravelWatch continues to be constituted as a separate body. The co-location of staff within City Hall should facilitate this process.**

#### **Proposal 3**

**We propose that steps to absorb London TravelWatch's back office functions within the GLA should be taken forward. A report should be submitted to the Transport Committee setting out progress with these proposals by December 2010.**

# What London TravelWatch does and proposals for reform

Sharing accommodation and back office functions with the GLA are obvious areas to target when seeking efficiencies; so-called low hanging fruit. This panel was charged with delivering a fundamental review of how London TravelWatch operates and to look at how its core functions might be delivered more effectively and at a lower cost. The remainder of this chapter therefore examines these functions in detail.

Responsibility for its core functions lies with London TravelWatch's research and development, and public liaison and casework teams. We describe the staffing and other resources allocated to support these teams before examining the work they carry out. We consider this under the headings used in London TravelWatch's most recent annual report:<sup>11</sup>

- responding to consultations on transport issues
- monitoring trends in service quality
- representing the travelling public in discussions with opinion formers and policy makers
- investigating complaints brought by people who are dissatisfied with responses they have received from service providers and seeking redress on their behalf where appropriate

We conclude this chapter by presenting alternative models of delivery which we believe could generate savings. In reaching these conclusions we have worked to two key principles. First, we have sought to eliminate duplication of resources between London TravelWatch and other bodies with similar functions. Secondly, we have concentrated on what we consider to be the core statutory functions of London TravelWatch.

Defining its core statutory functions is not straightforward. The various legal duties and functions of London TravelWatch are complex and can be used to justify a wide range of work. They are though largely discretionary and there is a wide range of ways it could choose to exercise and interpret these functions. Our proposals are made with this in mind and what we consider a reasonable use of public money in the current financial climate.

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<sup>11</sup> London TravelWatch Annual Review 2009

The proposals for reform in this chapter can, we believe, be delivered within the existing legal framework.

### **Research and development**

The research and development team currently consists of a director supported by 3.8 full-time equivalent staff at an annual cost, including on-costs, of around £215,000. The team also manages a small research and publications budget of around £30,000.

The team is responsible for, among other tasks, responding to consultations; drafting research reports, monitoring reports and submissions to inquiries; liaising with transport operators on behalf of passengers; and supporting the board and casework team with written and oral advice.

The statutory basis for the team's work is its role as a statutory consultee for transport operators and in its various general statutory duties to keep under review and investigate matters relating to London's transport users.

### *Responding to consultations on transport issues*

London TravelWatch is a statutory consultee, named in franchises or licences, and has a duty to consider matters in relation to a wide range of transport providers. These include services provided by Transport for London, train operating companies serving the capital and international rail services insofar as these involve services in the London railway area.

In practice, it is a matter for London TravelWatch staff, under guidance from its board, to decide what consultations to respond to and in what detail. In 2009-10, it responded to 239 consultations out of a total of 372 received. In addition, London TravelWatch commented on a further 227 proposals relating to borough streets sent to it by around 20 London boroughs. London TravelWatch is not a statutory consultee for such proposals and it relies on its relationship with individual boroughs to be notified of them. A breakdown of these consultations by mode is set out in the table below.



Mode	Responses submitted	Consultations received	Percentage responded to
All modes	5	5	100
Buses	77	138	56
London Underground	3	3	100
National rail	152	223	68
Streets	227	600	38
Other	2	3	67
<b>Total</b>	<b>466</b>	<b>972</b>	<b>48</b>

Source: London TravelWatch. The figure for the number of consultations on borough streets is an estimate as this information was not previously routinely recorded.

The London TravelWatch Board considers major consultations in draft. An example of this would be London TravelWatch's response to the Mayor's draft transport strategy.<sup>12</sup> Staff submit the vast majority of consultation responses under schemes of delegation agreed by the board. These schemes of delegation set out the organisation's position on particular issues which are then reflected in the response which is submitted and subsequently reported to the Board.

Around 60 per cent of respondents to our survey thought that London TravelWatch effectively represented the views of passengers in its consultation responses. A similar percentage thought that London TravelWatch chose to respond to consultations when it could add value and address issues from a passenger perspective.

#### *Monitoring trends in service quality and research to support the representation of passengers*

London TravelWatch's main outputs from this work are its research reports, of which it publishes about three to four each year; contributions to investigations by other bodies such as the Assembly's

<sup>12</sup> see Agenda Item 7 to Board meeting of 10 November 2009

Transport Committee and the House of Commons Transport Select Committee; and performance reports. The latter are a recent innovation and draw on and pull together performance data published by operators for comparison purposes.

As a result of the constraints of its budget, London TravelWatch's research reports generally rely on secondary sources such as existing research data and other published research.<sup>13</sup> They also include analysis of existing policies and a discussion section which explores options and supports or opposes particular approaches. London TravelWatch uses its small research budget to commission its own directly sourced data where no other sources are available. Recent examples of such commissioned research include bus passenger priorities and passenger views of first class travel. These reports are considered and agreed by the board and are drafted to reflect the evidence base and the views of the members.

The quarterly performance reports published by London TravelWatch summarise performance data produced by operators. For example, the TfL quarter 4 performance report published in July 2010, summarises data relating to all modes of transport. The aim is to "provide, in one place, information about the performance of TfL's transport network from the perspective of users."<sup>14</sup>

Historically, the Assembly has not funded London TravelWatch to carry out primary research on the views of passengers. The model adopted has been a representative one whereby the board is appointed to try to reflect the views of passengers rather than a research-based model.

### **Public liaison and casework**

This team is made up of a director supported by 7.2 staff at an annual cost, including on-costs of around £350,000. Its core function is to deal with casework arising from complaints by passengers about the level of service from transport operators. The team also provides IT and administrative support to the organisation; deals with data protection and freedom of information requests; manages the corporate risk register; and oversees business continuity arrangements.

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<sup>13</sup> see, for example, *Cycling in London*, May 2009

<sup>14</sup> TfL Q4 performance report, London TravelWatch, p 1

The statutory basis of London TravelWatch's casework activity is sections 248 and 252A of the GLA Act 1999. These place a duty on it to consider representations by passengers of Transport for London and rail services in the London railway area<sup>15</sup> and to take them up with the relevant operator as appropriate. In practice, London TravelWatch acts as an appeal body for passengers dissatisfied with the response given by transport operators to their original complaint.

London TravelWatch sees this work as one of its core statutory functions and it is one to which the Assembly has attributed importance. It is also an area in which, by its own admission, its performance has historically been below target.<sup>16</sup> It has consequently made a number of changes to the way appeals are handled over the last couple of years.

In reporting its performance to the Board's Consumer Affairs Committee, and ultimately the Assembly's Transport Committee, London TravelWatch puts its casework into five categories: appeals; consultations; direct cases; enquiries and initials. Its description of each type of case is reproduced below.<sup>17</sup>

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<sup>15</sup> The London rail area is defined in statute and goes beyond the GLA boundary

<sup>16</sup> Consumer Affairs Committee, 22 April 2009

<sup>17</sup> Annex A to the Consumer Affairs Committee of London TravelWatch, 10 March 2010. Note: It also reports against performance on cases referred by members of the board and staff but there a relatively few of these.

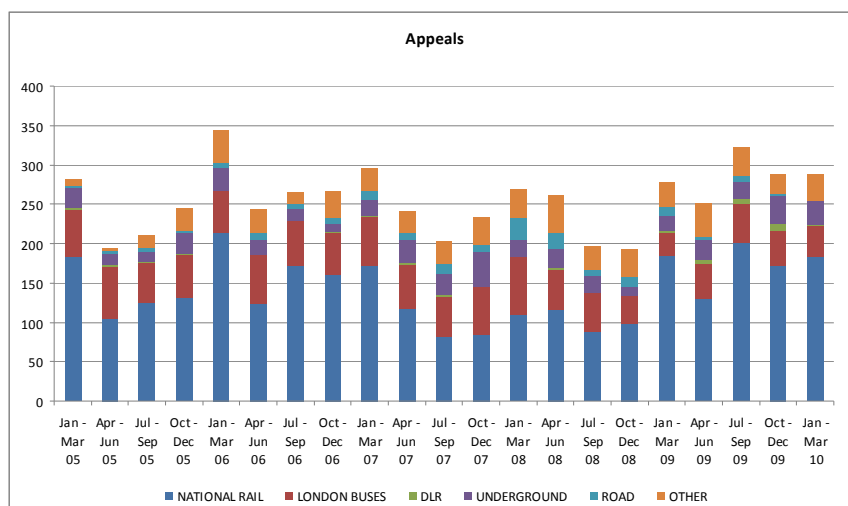
Case type	Explanation
Appeals	Cases we take up on behalf of the complainant. We refer these to the appropriate operator(s) and consider the response we receive from them.
Consultation	Cases that are subject to consultation. For example, cases received as part of the proposed changes to booking office hours by First Capital Connect where we would respond once a Board decision has been made.
Direct cases	Cases where we respond directly to a complaint, without going to the operator, either because we know the answer, have already got an agreed policy on the issue or we have no remit e.g. penalty fare cases which have followed the correct procedure.
Enquiries	These are requests for information, and are dealt with primarily by telephone. For many enquiries, we act as a signpost informing complainants who the most appropriate operator is to deal with their complaint or request for information or to register a lost property request.
Initials	Cases which have not yet been dealt with by the appropriate transport company. We pass to the appropriate operator and inform the complainant that we have done so.

A review of the casework function carried out by the Chief Executive in 2008/09 has resulted in, among other changes, a change of job description for caseworkers; reconfiguring the office to separate the core function from general reception duties; changes to policies on which cases are referred to members; and the introduction in October 2009 of new casework monitoring software.<sup>18</sup>

The figure below shows the number of appeal cases broken down by mode in each quarter since January 2005.<sup>19</sup> Although there are predictable seasonal trends to this work, volumes can fluctuate in response to particular events.

<sup>18</sup> London TravelWatch, Consumer Affairs Committee, agenda item 9, 22 April 2009

<sup>19</sup> Information provided to the review by London TravelWatch, May 2010



The data shows that London TravelWatch dealt with an average of just over 1,000 appeal cases each year. Appeal cases about national rail services accounted for 54 per cent of these cases; buses 20 per cent; and London Underground nine per cent. These cases involve liaison with the complainant and the operators and are therefore the most resource intensive.

London TravelWatch receives an average of around 1,200 cases per year from passengers who have not yet been through the complaints procedure with the operator, described as “initials”. Of these, around 50 per cent relate to national rail services. It also responds directly to cases where it has an agreed policy or knows the answer to the query (around 1,000 cases in 2009/10).

London TravelWatch has started recording all telephone inquiries since the introduction of the new casework monitoring software in October 2009. This suggests that it deals with over 7,000 inquiries each year, around 60 per cent of which come from bus passengers.

## Proposals for reform

### *New arrangements for representing London rail passengers*

We note the relatively disproportionate amount of work carried out by both teams on national rail services serving the capital. Seven per cent of Londoners use rail services at least five times each week. This

compares with 12 per cent of Londoners who use the underground and 26 per cent who use buses more than five times each week.<sup>20</sup>

Yet national rail services account for over 60 per cent of London TravelWatch's responses to statutory consultations and over 50 per cent of its appeal cases. This is likely, in part, to be driven by demand. There are more consultations relating to national rail and rail passengers, who may have purchased expensive season tickets and travel longer distances, are more likely to complain about the service they receive.

Both London TravelWatch and Passenger Focus have a statutory remit for representing rail passengers in London. This legislative anomaly came about as a result of the Railways Act which abolished separate regional rail passenger representative groups outside the capital.

An understanding between the two organisations currently accommodates this duplication. In practice, Passenger Focus does not respond to consultations relating exclusively to services within the London rail area and is not empowered to look at appeals relating to such services.

Passenger Focus does include operators of rail services in London within its national passenger survey, including Transport for London as operator of the London overground network. It also employs link managers for all train operating companies, including those running commuter routes into the capital. Similarly, Passenger Focus operates a casework function from its offices in Manchester for rail passengers outside the London rail area.

We believe that the taxpayer and rail passenger are not served well by the current confusing and overlapping arrangements. Two bodies are separately funded to represent rail passengers based on an arbitrary geographical line and can comment on the same issues on behalf of different types of passengers. The current confusion is perhaps best summed up by the response of the Parliamentary Under-Secretary of State for Transport to a recent House of Commons debate about an issue within the London rail area.<sup>21</sup>

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<sup>20</sup> London Travel Demand Survey supplement, March 2007

<sup>21</sup> House of Commons Westminster Hall Debate, Rail Services (South London line), 14 July 2010

In his reply to the debate, the Minister suggested that Members might “also want to contact Passenger Focus, because although London TravelWatch is the predominant body in London – Passenger Focus tends to let it have its say and take the lead there – Passenger Focus has responsibility for rail issues nationally so it may be interested in some of her comments.” In other words: both representative bodies have a potential interest and might take different views.

We suggest arrangements could be stream-lined within existing legislation to deliver a better and more cost-effective way to represent rail passengers in London. Our proposal is that, subject to the outcome of the national government review of NDPBs, Passenger Focus solely represents rail passengers in London.<sup>22</sup> We envisage commissioning Passenger Focus to deliver services related to London rail services and publishing its outputs under a London brand in a similar way to its outputs about services in Scotland and Wales.

Initial conversations with Passenger Focus suggest this can be achieved for less money than it costs to support these functions with London TravelWatch. This is because Passenger Focus can benefit from economies of scale in both its casework function and its existing link managers for the Train Operating Companies serving London. The proposal would also remove the anomaly by which a GLA-funded body has responsibilities beyond the GLA boundary.

We recognise that this proposal is likely to be controversial. For example, it might be argued that, on occasion, there are specific implications for passengers in London that are different from those for other passengers.

We do not accept this argument. Balancing the needs of different types of consumer is an inherent tension within any consumer body. The implications of service changes for passengers within different parts of London will also vary. There is not a magic line which once crossed means that London TravelWatch will represent a passenger’s perspective better than Passenger Focus.

We therefore believe it would be more cost-effective and clearer for passengers in the London rail area if they had one body representing their views. In practice, the functions carried out by about half the

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<sup>22</sup> We propose that these functions could be delegated to Passenger Focus under the power in paragraphs 12 and 13 of schedule 18 to the GLA Act 1999.

staff of the research and development and casework teams would transfer to Passenger Focus.

#### **Proposal 4**

**We propose that officers explore the potential for contracting Passenger Focus to fulfil the functions of London TravelWatch in relation to rail passengers in the capital.**

**They should report back to the Transport Committee with the legal and financial implications of these arrangements by March 2011.**

#### *Focusing the work of the research and development team*

We also believe the scope of the remaining work carried out by London TravelWatch should be reduced. As we note above, there is no obvious distinction between what London TravelWatch is required to do and what it may do. Nevertheless we believe there is work currently carried out by London TravelWatch that does not justify the resource allocated to it and we therefore recommend that it stops doing this work.

Specifically, in relation to the research and development team, there is scope to scale back its work on consultation responses and the publication of reports which summarise data and information published elsewhere. We explain our reasons below.

Nearly half of all London TravelWatch's consultation responses in 2009/10 relate to streets. Highways authorities are not required to consult London TravelWatch about proposals: Transport for London and about two-thirds of London boroughs opt to do so. London TravelWatch is statutorily required to consider any matter referred to it by Transport for London.

London TravelWatch regards this work as important because it believes such consultations otherwise tend to concentrate on the views of householders and business. It also believes its work in this area performs "a general education role to influence engineers to take account of, for example, bus passengers when they design bus stops".<sup>23</sup>

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<sup>23</sup> Information provided to the review by London TravelWatch, 12 May 2010



The scale of the work involved in these consultations responses vary. Some might involve a standard paragraph from the scheme of delegation agreed by the board. For example, London TravelWatch officers wrote in support of a proposal by the London Borough of Brent to implement an “at-any-time” waiting restriction on a road used by a bus service.<sup>24</sup> Others are more complex. London TravelWatch’s board agreed a response to joint proposals by Transport for London and the London Borough of Haringey to improve the major gyratory system at Tottenham Hale following a presentation to the board by TfL and Haringey officers.<sup>25</sup>

While we recognise that London TravelWatch has had some influence on proposals from individual boroughs, we do not think that on balance, the volume of work in this area is justified. London TravelWatch is not required to be consulted by boroughs so its work is inevitably skewed towards those boroughs which opt to consult it. It is difficult to see how the level of resource to read and assess around 600 responses each year can be justified, let alone the work involved in responding.

#### **Proposal 5**

**We propose that London TravelWatch stops responding to borough consultations relating to streets with immediate effect.**

We maintain that in major multi-modal consultations about proposals by the Mayor and Transport for London there should be a single representative body which responds on behalf of all Londoners. The mandate for such responses clearly lies with the Assembly and, in the case of public transport, with its Transport Committee.

Our point is illustrated by the responses to the development of the current Mayor’s Transport Strategy. Both the London Assembly’s

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<sup>24</sup> Letter to London Borough of Brent about waiting and loading restrictions on bus route 232, 10 February 2009

<sup>25</sup> TfL officers attended a board meeting on 26 January 2010. London TravelWatch subsequently submitted a response broadly welcoming the proposals but raising seven specific issues which it asked to be addressed.

Transport Committee and the board of London TravelWatch held public meetings with senior representatives from the Mayor's office – and the Mayor himself in the case of the Transport Committee – to discuss his draft Transport Strategy. Both subsequently responded.

London TravelWatch argues that its interest is purely the passenger and therefore it will have a different perspective on the Mayor's strategy than the Assembly whose constituents include taxpayers and residents who may not share the same perspectives.

We do not agree that this perceived difference is so great as to justify an additional response. It is inconceivable that the London Assembly Transport Committee would not seek to reflect the views of passengers in any response to the Mayor. It had a strong evidence base with which to do so in the light of its work on rail overcrowding and the passenger experience on the underground which drew on commissioned research of passengers' views.<sup>26</sup>

Furthermore, it cannot be a good use of time of highly paid officers of TfL and the GLA to attend two public meetings to discuss Mayoral priorities with two bodies with overlapping remits. At the end of these meetings two sets of officers are going away to draft responses which reflect the views of two sets of representatives: one elected and one appointed (by the other one). The outputs of the two bodies and their contribution to the debate on the Transport Strategy do not in our view justify this duplication of resources.

#### **Proposal 6**

**We propose that, with immediate effect, London TravelWatch cease responding to large-scale transport consultations to which the Assembly is planning to respond.**

London TravelWatch's analysis of policy areas in its research reports and performance monitoring is in our view generally of a high standard and reflects the wealth of experience in the team. This view is also supported by the respondents to our survey. It is though inevitably limited in scope and replicates to some extent what is done in other

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<sup>26</sup> Too close for comfort: passenger experience of the London Underground, London Assembly Transport Committee, November 2009; and The big squeeze: rail overcrowding in London, London Assembly Transport Committee, February 2009.

organisations. For example, parts of TfL performance monitoring data are considered at the Assembly by its Transport Committee and Budget Monitoring Sub-Committee. The TfL Board and its committees will also consider this information.

Similarly, London TravelWatch's research reports resemble to some extent scrutiny reports published by Assembly Committees. They tend to be more technical in tone than Committee reports and are generally limited to points of discussion rather than explicit recommendations. That said, both rely on the same processes of analysing policy and drawing on secondary sources.

London TravelWatch's performance monitoring work is interesting but we have some sympathy with the view expressed to us by one transport operator in our survey: "although the format works as a useful comparator with other operators, it is not clear how much this adds to [our] own performance reporting". Similarly, we do not think that this work is likely to be sufficiently effective in influencing debate and policy development to justify the work involved.

#### **Proposal 7**

**We propose that London TravelWatch ceases committing resource to production and publication of its performance monitoring reports with immediate effect.**

#### *Focusing the work of the Public Liaison and Casework team*

London TravelWatch recently appointed external consultants to carry out a benchmarking exercise of this function against comparable appeals bodies.<sup>27</sup> This suggested that the organisation of the function compared well and that there were no obvious inefficiencies. We would though expect savings to accrue from the transfer of its rail casework to Passenger Focus.

In respect of its remaining responsibilities there is limited scope to deliver the same service to passengers at a reduced cost. That said, the huge volume of what London TravelWatch records as inquiries is an area which we believe should be looked at again.

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<sup>27</sup> London TravelWatch: benchmark of casework activity, ComplaintsRgreat Ltd., June 2010

London TravelWatch describes inquiries as largely requests for information from passengers. Examples given include sign-posting passengers to the appropriate operator for their complaint or registering a lost property request.

The disproportionately high number of such calls from bus passengers is almost certainly a result of the fact that London TravelWatch's telephone number is displayed on London buses alongside the number for Transport for London. Although passengers are advised to complain to Transport for London in the first instance the number provided is an 0845 number. Such numbers are more expensive to call from a mobile phone and therefore passengers often call London TravelWatch direct.

As a result, the board's Consumer Affairs Committee was invited to ask Transport for London to remove London TravelWatch's number from its publicity material and only to pass it on when referring complainants on appeal.<sup>28</sup> The Committee decided not to implement this recommendation on the grounds that it wanted to maintain a visible presence for the organisation.

**While we understand the motivation of the board to maximise the profile of the organisation, it is now time for London TravelWatch to concentrate on its core activities. Providing a first point of contact and general advice for passengers is not a core activity. 7,000 such inquiries a year must put a significant pressure on resources.**

#### **Proposal 8**

**We propose that London TravelWatch asks Transport for London to remove its contact details from publicity on buses by the end of 2010. It should ask Transport for London only to provide these details when a complainant has expressed dissatisfaction with the outcome and wants to appeal. The Board should take further immediate measures to redirect and deter inquiries which are not related to appeals.**

#### **Financial consequences of our proposals**

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<sup>28</sup> Paper CA03 to the Consumer Affairs Committee, 22 April 2009

The efficiencies which would derive from the proposals in this chapter are dependent to some extent on the progress of discussions with Passenger Focus and, potentially, the outcome of the national government review. Specifically, we would need to assess the cost of commissioning services from Passenger Focus compared with the current costs of delivering them directly. We would expect to have arrangements in place by the start of 2011/12.

Our other proposals reduce the scale of work done by both the research and development and public liaison and casework teams. We estimate that these are equivalent to one post in each team and therefore suggest they would generate savings of around £65,000 per annum.

# Conclusion

We propose in this report a radical new approach to passenger representation and the fulfilment of the existing statutory duties and functions of London TravelWatch. In short, we envisage folding the organisation within the London Assembly to achieve significant savings in the sharing of back office functions such as accommodation, corporate management, communications, finance, human resources and committee administration.

The board would be replaced by a small number of Assembly Members who would oversee the work to support passenger representation in the capital. We would expect that this work would be carried out by a small secretariat in City Hall which would fulfil the casework and research functions relating to Transport for London. Passenger Focus would be commissioned by the Assembly to take on responsibility for rail passenger representation in the London rail area.

Some of these changes require amendments to the legislation. We propose that shadow arrangements are put in place to oversee the transition to the new structures while the legislative changes are taken forward.

We recognise that the changes we propose in this report significantly alter the way passengers are represented in the capital. For example, there would no longer be an arms-length body with its own secretariat working in detail on all transport modes in London.

The proposals, if agreed by the Assembly, would also have a big effect on the current board and staff. The board would be replaced. Of the jobs currently done by staff at London TravelWatch, some would be carried out at Passenger Focus; some would be done at City Hall; and some will no longer be required.

We believe these changes are necessary though. The scale of the retrenchment in public finances means that tough decisions need to be made and functions that are desirable rather than essential need to be re-examined. A separate arms-length body to represent passengers supported by a secretariat at a cost of £1.6 million per year is, in our view, no longer possible to justify.

What we are proposing instead though will, we believe, ensure that the passenger voice in London remains heard at a greatly reduced cost. Appendix 1 to this report summarises the potential savings

accruing from our proposals subject to the progress of various legislative and contractual arrangements.

This appendix sets out the potential savings under three scenarios. The first assumes that the Assembly takes on the legislative functions of London TravelWatch; commissions Passenger Focus to carry out the functions relating to rail services in the London area; and that the remaining staff are accommodated at City Hall. We would envisage retaining two small research and development and casework teams. All remaining functions would be absorbed within existing teams at City Hall. Scenario 2 is similar but may require additional staff to support a separate board if legislative change is not secured.

Scenario 3 assumes that all current functions are delivered in-house but on a reduced scale as set out in this report. Back office functions would be shared and accommodation provided within City Hall and a separate board maintained. We anticipate this would require a staff team of roughly half the current London TravelWatch complement.

In summary, we estimate that with the legislative change and arrangement with Passenger Focus that we propose we could generate savings in the range of £830,000 to £1,000,000 per annum after two years; without these changes, savings might be more in the range of £480,000 to £520,000 per annum.

London's passengers' views would continue to be represented and by an elected body directly accountable to them and whose statements on their behalf will be rooted in evidence-based research of their views. In this way we believe we can deliver value for money to passengers and the taxpayer.

# Appendix 1 - summary of potential savings

We set out below potential savings from our proposals based on three scenarios. The savings are expected to be fully realised after two years.

**Scenario 1:** The legislation is changed to enable the Assembly to assume the functions and duties of London TravelWatch; Passenger Focus agrees to be commissioned to represent rail passengers in the London rail area at terms to be agreed; and the remaining staff are accommodated at City Hall.

Scenario 1 - savings	Range
Accommodation	(£183,000) to (203,000)
Delivery of rail services functions in the London area by Passenger Focus under a service level agreement.	(£170,000) to (£290,000)
Merging of finance, HR, committee services, management and communications	(£404,000) to (£426,000)
Assembly takes on the functions of the board	(£80,000) to (£98,000)
<b>Total</b>	<b>(£837,000) to (£1,017,000)</b>

Note: assumes range of savings from transfer of rail functions to Passenger Focus. The level of savings is dependent on the application of the Transfer of Undertakings (Protection of Employees) Regulations 2006 ("TUPE") for relevant staff. The total savings suggested would therefore be reached after two years once the relevant staffing transfers have been made and the accommodation savings can be realised on the expiry of the lease at London TravelWatch's offices.

**Scenario 2:** The legislation is unchanged; Passenger Focus agrees to be commissioned to represent rail passengers in the London rail area at terms to be agreed; and the remaining staff are accommodated at City Hall.



<b>Scenario 2 - savings</b>	<b>Range</b>
Accommodation	(£183,000) to (£203,000)
Delivery of rail services functions in the London area by Passenger Focus under a service level agreement.	(£170,000) to (£290,000)
Merging of finance, HR, and committee services	(£267,000) to (£282,000)
Reduced board	(£28,000) to (£35,000)
<b>Total</b>	<b>(£648,000) to (£810,000)</b>

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Note: see scenario 1 for assumptions.

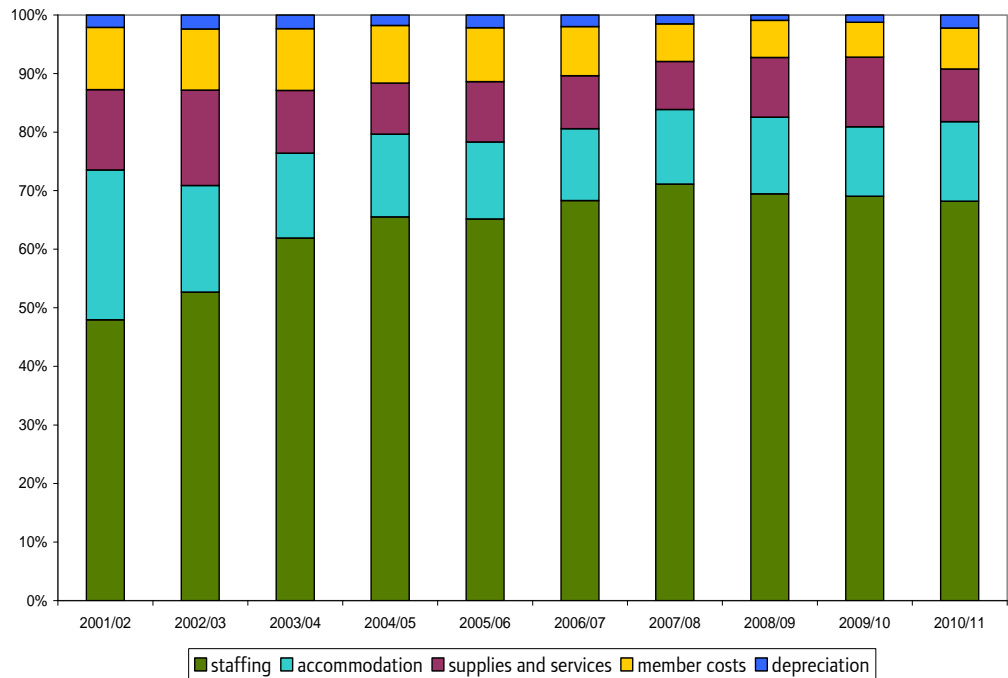
**Scenario 3:** no legislative change and no functions commissioned from Passenger Focus. Other changes as proposed in the report.

<b>Source of saving</b>	<b>Range</b>
Accommodation	(£183,000) to (£203,000)
Merging of finance, HR, and committee services	(£267,000) to (£282,000)
Reduced board	(£28,000) to (£35,000)
<b>Total</b>	<b>(£478,000) to (£520,000)</b>

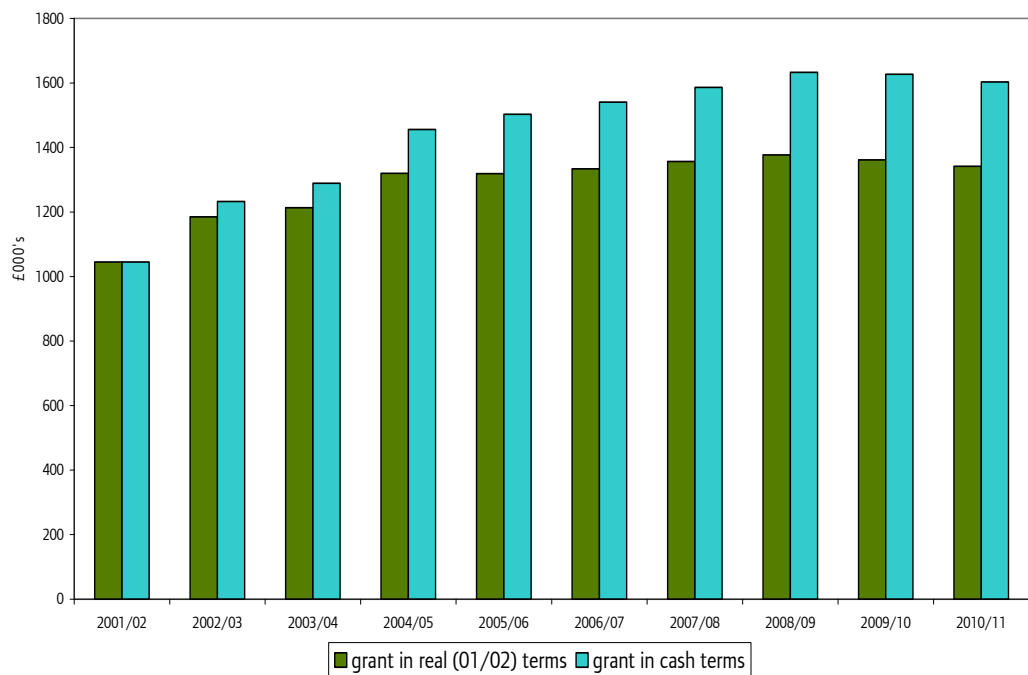
Note: see scenario 1 for assumptions

## Appendix 2 - the allocation of London TravelWatch's budget

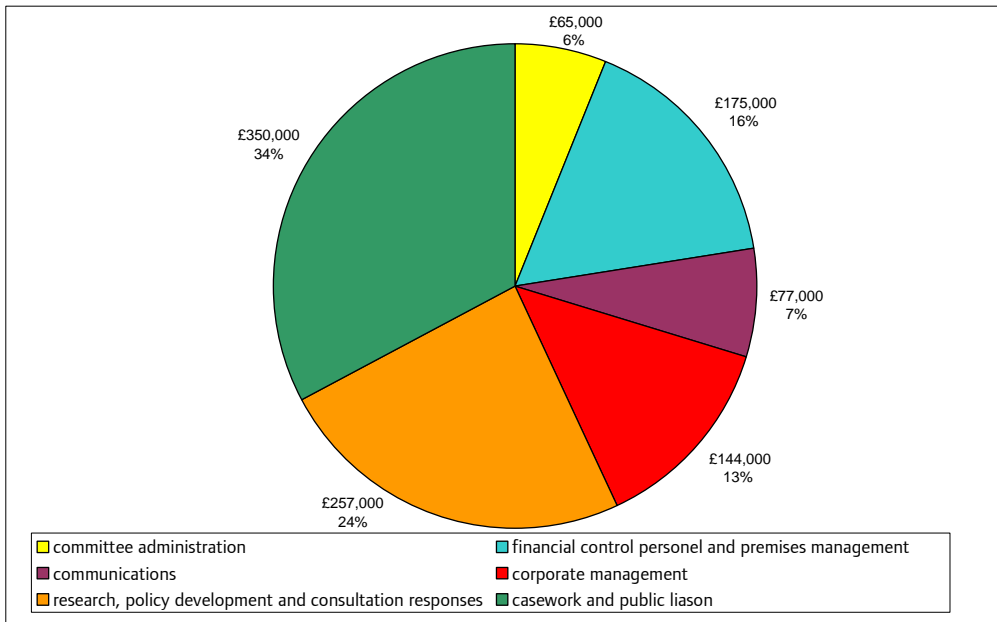
London TravelWatch annual expenditure by category



Grant received by London TravelWatch from the GLA



## London TravelWatch Staffing costs by function



## Appendix 3 Proposals

### Proposal 1

We propose that London TravelWatch should not remain as a separately constituted organisation and its functions and duties in relation to the representation of the capital's public transport users be vested in the elected London Assembly. We further propose that discussions to this end, and any necessary legislative changes, are taken forward with the relevant government departments during the autumn. As an interim measure, it is proposed not to reappoint the six positions on the board which will become vacant in December 2010.

### Proposal 2

We propose that the staff of London TravelWatch be re-located to City Hall as soon as is practical, and by the latest April 2011, and that negotiations should be started with the current landlord with a view to realising savings in accommodation costs from the earliest possible date.

### Proposal 3

We propose that steps to absorb London TravelWatch's back office functions within the GLA should be taken forward. A report should be submitted to the Transport Committee setting out progress with these proposals by December 2010.

### Proposal 4

We propose that officers explore the potential for contracting Passenger Focus to fulfil the functions of London TravelWatch in relation to rail passengers in the capital. They should report back to the Transport Committee with the legal and financial implications of these arrangements by March 2011.

### Proposal 5

We propose that London TravelWatch stops responding to borough consultations relating to streets with immediate effect.

### Proposal 6

We propose that, with immediate effect, London TravelWatch cease responding to large-scale transport consultations to which the Assembly is planning to respond.

**Proposal 7**

We propose that London TravelWatch ceases committing resource to production and publication of its performance monitoring reports with immediate effect.

**Proposal 8**

We propose that London TravelWatch asks Transport for London to remove its contact details from publicity on buses by the end of 2010. It should ask Transport for London only to provide these details when a complainant has expressed dissatisfaction with the outcome and wants to appeal. The Board should take further immediate measures to redirect and deter inquiries which are not related to appeals.

# Appendix 4 Orders and translations

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Bengali

যদি আপনাকে এই দস্তাবেজের সারাংশ আপনার মাধ্যমে  
চাওয়া হয় তবে দয়া করে নম্বর ০২০ ৭৯৮৩ ৪১০০-এ ফোন করুন  
বা উপর দিওয়া ঠিকানাতে আমাদের সাথে যোগাযোগ করুন।

Greek

Nếu ông (bà) muốn nội dung văn bản này được dịch sang  
tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện  
thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Urdu

آپانی যদি এই دسلیلےر اےکٹا ساراংশ نیجےر باضای پےتے چان،  
تاہلے دیا کرے یو کرانےن اٹھا اٹلےخیت ڈاک ٹیکانای یا  
ای-میل ٹیکانای آماناےر ساٹھ یوگااؤاؤا کرانےن۔

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα  
σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί  
μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

Turkish

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں  
درکار ہو تو، براہ کرم نمبر پر فون کریں  
یا مذکورہ بالا ڈاک کے پتے یا ای میل  
پتے پر ہم سے رابطہ کریں۔

Bu belgenin kendi dilinize çevrilmiş bir özetini  
okumak isterseniz, lütfen yukarıdaki telefon  
numarasını arayın, veya posta ya da e-posta  
adresini aracılığıyla bizimle temasa geçin.

Punjabi

الوصول علی ملخص لهذا المستند بلغتك،  
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بالعنوان البريدي أو عنوان البريد  
الإلكتروني أعلاه.

Gujarati

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਅਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ  
ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ  
ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં  
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