

Office of Rail Regulation retail market review consultation: Potential impacts of regulation and industry arrangements and practices for ticket selling

Response

Q7. What are your views on split ticketing?

It is an anomaly in the system that should be fixed. Yet until it is consumers should always be offered the option of the cheapest fare – and if that is by splitting tickets once, twice, or fourteen times rail firms should be obligated to tell them this and to make it easier for people to buy the cheapest tickets.

As the cheapest fares are currently hidden from consumers, we have found it necessary to develop a tool, Tickety Split, using thetrainline.com's data. Yet all rail firms should be telling their customers this.

Are passengers appropriately safe-guarded against the attached risks?

We believe there should not be any risks attached to split ticketing. Yet the train operating companies (TOCs) and retailers have created these risks and we don't believe passengers are fully safe-guarded against them. The industry should and could easily eliminate these risks.

As the TOCs have pointed out, the terms and conditions associated with split tickets are not the same as the end-to-end ticket. We understand there is a risk to passengers if:

- They book time-specific tickets and the journey requires a change, either at or before the split ticket station. If their first train runs late then their second ticket might not be valid for the next leg of the journey.
- They book off-peak or super off-peak tickets and the journey requires a change, either at or before the split ticket station. If their first train runs late then their second ticket might not be valid for the next leg of the journey if the delay takes them outside the off-peak time.

We believe the TOCs should be protecting passengers against these risks, which are as a result of delays to their own service through no fault of the passengers. The simple solution would be for TOCs to change their terms and conditions, so passengers are not penalised if they travel on a train that their ticket would not normally allow because they were delayed on a prior service.

We understand Passenger Focus's concern that split ticketing can add to passenger confusion, but that is a reason for fixing the system and ensuring fair, affordable and simple pricing, not for discouraging people to split ticket while it is the cheapest route nor for banning split ticketing.

While the TOCs should still address the risks by amending their terms and conditions, the industry (from online retailers to the ticket offices, ticket machines and train staff) should not only make these risks clear to consumers but it should be honest and upfront with them. If a consumer asks for the cheapest ticket from A to B the retailer should offer the cheapest fare, which includes if the ticket needed to be split either one or more times. Train staff should then be helpful and considerate with passengers who do have split tickets and they should be accommodating if passengers become affected by the risks, such as if they have experienced a delay. If the industry was more transparent it would help minimise passenger confusion.

We would point out that we clearly explain to Tickety Split users and in our guides what consumers should watch out for and what they should do if their journey is delayed. In October 2014 over 120,000 people viewed our cheap train tickets guide over 140,000 times. Over the last six months consumers made over 630,000 searches for split tickets using our Tickety Split tool.

[To what extent do industry processes and systems enable split ticketing to be developed by industry and used by passengers?](#)

Our primary concern is that TOCs and retailers should be displaying the whole range of fares to consumers for any given day, rather than a small selection. We believe the industry should focus its time and resources on addressing the wider issue of unfair ticket pricing – but until this is achieved, it should as a minimum remove barriers to split ticketing and make it more available to consumers.

We note that Rail Settlement Plan (RSP) raised a concern that split ticketing journey planning engines would cause undue burden on retailing systems. As a result, RSP has mitigated this risk by imposing a limitation on the number of transactions that can be processed. This restricts the ability of our site and others to fully develop split ticketing. We believe RSP needs to upgrade its systems so there is no technological impact of split ticketing, rather than restricting its use and obstructing its development.

[Where there are issues, what could be done to address them?](#)

We believe there are two fundamental issues. Firstly, the system of ticket pricing is broken and until it is fixed, split ticketing is the only solution for consumers to purchase the cheapest fares.

Secondly, consumers should be given the option to purchase the cheapest ticket for any journey from any retailer, which includes showing split tickets by default. Consumers should also be advised by the TOCs' and retailers' staff of split ticketing and staff should help make split ticketing work for consumers by treating their tickets as one journey when they are affected by the risks. At the same time the industry should be working to eliminate these risks.

Until ticketing systems and retailers automatically include split ticketing options, we will continue to encourage and develop split ticketing to help consumers cut the cost of travelling by train.

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During the month of October 2014 the site had 15.3 million users visiting the site more than 25 million times and looking at more than 72 million pages. Over 9 million people have opted to receive our free weekly email and more than 1 million users have registered on the forum.