

# Review of the transparency of fees charged when purchasing rail tickets online

11 December 2023



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## Executive summary

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We see that consumers are increasingly turning to online websites and digital applications (apps) to purchase their rail travel tickets. In doing so, they can choose from a selection of more than 40 online retailers, made up of all train operators and third-party retailers (TPRs), all of whom sell rail tickets for mainline services across Great Britain.

We note consumers may be charged additional fees over and above the cost of their travel when they choose to purchase their rail tickets online. We want to protect consumers by ensuring there is clarity regarding fees to prevent them from paying more than they expected or intended. Consumers must be able to easily locate information about the fees they will be charged so they can make informed choices. The purchase process should be easily navigable, clear and transparent, with relevant information being provided sufficiently in advance of the transaction.

The term 'drip pricing' is used when consumers are shown an initial price for a product and additional fees are introduced as they are drawn through the purchase process. The Digital Markets, Competition and Consumers (DMCC) Bill is currently passing through the Houses of Parliament. The Bill aims to boost competition in digital markets and increase consumer choice whilst protecting consumers and businesses from unfair and illegal practices. In parallel, the Department for Business and Trade (DBT) recently set out the risks to consumers of drip pricing, where behavioural biases mean that consumers can be drawn into paying more than they intended or needed to. Research commissioned by DBT found this is a common strategy used by online retailers, and we seek to protect consumers from its effects in the rail sector.

We reviewed the information provided on 40 online rail ticket retailers' desktop websites and mobile apps in respect of booking fees (including finder's fees for split ticket options), fulfilment fees and refund/amendment fees. We also made test purchases for a low value 'Anytime Single' fare, and simulated purchases for a long-distance journey, from each desktop website and mobile app.

The fees we focused on are:

- **Booking Fees** - These are charged by many but not all TPRs. The fees charged ranged between £0.45 (per ticket) and £6.45 (per transaction). Train operators are not permitted to charge a booking fee.
- **Finder's Fees** - These are charged by those TPRs who offer a split ticketing service. Split ticketing is where multiple tickets are purchased for different

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sections of a journey, instead of buying just the one ticket for the entire trip. The fees were typically 10-15% of the saving made, as compared to a direct through-ticket.

- **Fulfilment Fees** - These are charged by some retailers for receiving tickets by post or by collection at a Ticket Vending Machine (TVM). Where we saw fees for fulfilment by post, these were based on postage costs (for example first class, second class, special delivery etc.). Where we saw fees for collection at a TVM, it was always at a cost of £1.
- **Refund Fees** - These are charged for cancelling or amending a ticket and such fees are currently capped at £10.

We assessed our observations from this review against principles that reflect the requirements of the relevant consumer law framework. We seek to reduce risk to consumers and protect them against issues when they make ticket purchases. We identified both areas of good practice and other areas of concern, noting that some retailers:

- failed to provide specific information regarding booking or finder's fees within the upfront price.
- did not, at each stage, provide a clear breakdown of the total price, to show the split between the fee and the ticket price and give appropriate prominence to the fee. We note that some retailers did this particularly well.
- did not provide readily available, transparent and accurate information about fees for consumers to read in advance of engaging with the booking process. Where this was done well, retailers set out when fees apply, stated the level of any fixed fees, and explained how variable fees are calculated, including interactions with ticket price, timing and any difference in fees between website and app purchases.

Where we identified these concerns, consumers are exposed to the risk(s) that they pay more than they expected, or intended, to pay for their travel.

Initially, we have written to seven retailers linked to concerns we held about their current practices and the possibility of harm being caused to consumers. In these letters we set out our concerns, sought to engage and promote change in the current working practices. We have requested responses in January 2024. We plan to publish our letters and the responses received on our website and will consider next steps accordingly.

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We are disseminating this report to all rail ticket retailers. We have asked retailers to assess their offering against the consumer law principles and framework in order to make changes where there are opportunities to improve the transparency of their offering to consumers. This will better assist consumers in making informed purchasing decisions. In view of this, we will carry out a further review of retail platforms in due course.

With over 40 online retailers, consumers have a significant choice of options for online rail ticket purchases. Therefore, we are also disseminating the report to bodies that provide consumer advice, including Transport Focus.

We will continue to closely follow the progress of the DMCC Bill alongside the DBT's work on price transparency. Accordingly, we will consider whether further action may be needed for the rail sector considering any new proposals to tackle hidden fees online.

# 1. Background

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- 1.1 Over recent years, there has been an increase in digital retailing in the rail sector, as consumers move towards using websites and apps to purchase their rail tickets.
- 1.2 There are over 40 retailers selling rail tickets online, split between train operators and third-party ticket retailers (TPRs). Consumers can purchase rail tickets for all mainline services across Great Britain from all retailers, and the standard through fares (for example Advance, Off-Peak, Anytime) are the same price on all platforms. Consumers therefore have significant choice. In response to a [Transport Focus](#) survey (carried out in December 2022 and January 2023), 55% of respondents reported purchasing rail tickets through websites and apps. Of those, 60% reported purchasing from Trainline (a TPR), 5% from other TPRs, and the remaining 35% from train operator websites and apps.
- 1.3 Consumer law aims to ensure that businesses are fair and open in their dealings with consumers. In our role as a consumer authority (concurrent with the Competition and Markets Authority), we want to ensure that consumers are provided with clear, timely and accurate information when buying their rail tickets so that they can make informed purchasing decisions.
- 1.4 This report explores the transparency of fees charged by retailers to those consumers who choose to buy their rail tickets via a website or app.

## Types of fees charged for online rail ticket purchases

- 1.5 Our review focuses on four main fee types charged by online retailers.
- 1.6 A **Booking fee** is a mandatory fee charged by many TPRs for purchasing a ticket on their platform. Most TPRs charge a fixed fee but some have a variable fee, and some do not charge. Where fees varied, key factors we identified influencing these included ticket price, timing of purchase and platform (website or app). Train operators are not permitted to charge a booking fee.
- 1.7 A **Finder's fee** is a mandatory fee charged by those TPRs whose platforms offer split ticketing options. Split ticketing is where a journey is broken into sections, with a separate ticket for each part; tickets can be split at any station where a train calls on its journey. The finder's fee is typically a fixed percentage of the cost-saving achieved compared to a through ticket.

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- 1.8 A **Fulfilment fee** is a fee for collecting or receiving a ticket purchased online. All retailers must offer at least one free fulfilment option and a digital or e-ticket was found to always be offered as a free option. Other options are also sometimes offered without charge but many offer additional options for a fee and may for example charge for delivery by post or collection from a Ticket Vending Machine (TVM).
- 1.9 A **Refund fee** is a mandatory, fixed fee charged to the consumer when they change their mind about travelling and request a refund. Consumers have a right to a fee-free refund if the service is not delivered (for example due to delays or cancellations). For most ticket types, consumers are also able to request a refund if they change their mind about travelling, which attracts a fee of up to £10 as permitted by the National Rail Conditions of Travel.
- 1.10 Some retailers also offer an incentive scheme, whereby the consumer can sign up to obtain discounts or rewards on future online purchases (not only rail tickets). These schemes are usually administered by a separate company and take a monthly fee from the consumer's bank account.

## Potential consumer detriment

- 1.11 Through this work, we are looking to mitigate two key risks to consumers in relation to fees that they may be charged when they purchase rail tickets.
- 1.12 There is a risk that consumers pay more for their purchase than they expected to pay because of drip pricing (when consumers are shown an initial price for a product and additional fees are introduced as consumers proceed with a purchase). This may arise where fees are not included in the upfront price.
- 1.13 There is also a risk that consumers pay fees that they have not made an informed decision to accept, and so pay more for their travel than they need to. This may arise because:
- they are not aware that they are being charged a fee, or how much it is, because information is not transparently presented during the sales process.
  - they are not able to compare the fees charged by different retailers or on different platforms because information is not easily available and/or the fee calculation is complex.
  - they are not aware that there are options to purchase tickets without a booking fee.



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- 1.14 The [Department of Business and Trade](#) recently set out the risks to consumers of drip pricing, where behavioural biases mean that consumers can be drawn into paying more than they intend or need to. This is because consumers either place more weight on the first piece of information they are presented with, on the time spent going through the transaction process or convince themselves that they made the right choice by selecting one product over another despite later finding out that it will cost them more.

### Consumer law principles

- 1.15 We are looking to uphold compliance with consumer law and, informed by the legal framework (see Annex A), have set out principles relating to the application of fees for online purchases. The principles seek to reduce the risks consumers may face when they make purchases and focus on two areas: the presentation of fees during the booking process and information provision for consumers about the terms and conditions of the service. These principles provide the foundation for the analysis in this report.



## Consumer law principles

### Presentation of fees during the booking process

#### **A. Where there is a mandatory fee for purchasing a rail ticket online:**

A1. it should be included in the price at the earliest opportunity, which for rail ticket purchases is commonly the upfront price that is first displayed to the consumer.

A2. It should be clear to the consumer that a fee is being charged and how much it is throughout the booking process.

#### **B. Where there is a ticket fulfilment option available for a fee:**

B1. it should not be pre-selected.

B2. where an option with a fee is selected by the consumer, it should be immediately included in the total price displayed to the consumer.

### Information provision for consumers

#### **C. There should be readily available, transparent and accurate information online for consumers to read in advance of engaging with the booking process about:**

C1. mandatory booking fees associated with ticket purchases. This should explain when fees apply, state the level of any fixed fees, and explain how variable fees are determined (for example whether fees vary with ticket price, timing of purchase or any difference in fees between website and app purchases).

C2. ticket delivery options and any fees associated with each option.

C3. eligibility for refunds and ticket amendments, and any associated costs.

## 2. Methodology

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- 2.1 We reviewed the general information provided on retailers' websites and apps about fees and purchased tickets through desktop websites and mobile apps. The review predominantly took place during July to August 2023.
- 2.2 We looked at 21 train operators and 19 TPRs, with the TPRs taken from the list of accredited consumer retailers provided to us by the Rail Delivery Group (RDG) in July 2023. Some retailers have a website and an app, others have just one platform. A full list of the retailers we reviewed is available at Annex B.
- 2.3 There were three strands to our review (although not all of them were relevant to every retailer):
- **a review of the information provided on fees on the general pages of the platform.** This included the general information pages (for example how to buy a ticket) as well as FAQs and help centre pages.
  - **a test purchase of an Anytime ticket for a specific short journey,** following the purchase process right through from beginning to end (Stourbridge Town to Stourbridge Junction was chosen as a low-value Anytime single fare). For a small number of retailers, we carried out a simulated purchase, without completing the final transaction.
  - **a simulated purchase from TPRs offering split ticketing services** (Bristol Temple Meads to Leeds was chosen as a journey offering multiple split ticket options).
- 2.4 We wanted to understand:
- the transparency of information retailers displayed on their websites and apps about the fees, including how easy it is to locate and understand the information and the level of detail provided.
  - when and how fees are displayed during the purchase process.
  - what information consumers are provided with about the fees during the purchase process, for example information on how they are calculated and when they apply.
  - how the fees are displayed once a ticket is purchased.

## Evidence recording

- 2.5 We captured evidence using screen recordings of purchases made on websites, and screenshots of both the purchases made through apps and of information provided on retailers' main websites and apps.
- 2.6 These methods were used to produce a record of the information that was provided to the consumer and what the consumer's experience of the purchase process looked like. This also meant that we were able to refer to the purchase process experience during the analysis stage, to ensure an accurate recollection and strengthen the robustness of our findings.

## ORR's Consumer Expert Panel

- 2.7 We sought advice from ORR's Consumer Expert Panel on our emerging findings. The Panel provide independent advice and play a key role in bringing a consumer perspective to our policy and regulatory decisions. They were supportive of our review, recognising the potential for consumer harm where businesses are not fully transparent with regards to the application of fees.

## 3. Research findings and analysis

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3.1 In this section, we set out the findings from our review, providing anonymised examples of the practice we observed and highlighting where we identified concerns when assessing our findings against the consumer law principles described above (see Section 1 - Background).

### Purchasing tickets: mandatory booking and finder's fees

#### Background

3.2 TPRs are allowed to charge booking and finder's fees, and we found a range of approaches. Of the 19 TPRs that we reviewed, we found that:

- seven did not charge any booking or finder's fees.
- three charged a fixed booking fee that did not vary with the type of purchase.
- two charged a variable booking fee, with the level of the fee varying for example depending on the ticket price, time of purchase or whether the purchase was on a TPR's website or app.
- five charged a finder's fee for a split ticketing service.
- two charged a different type of fee depending on the service that a consumer used, with a fixed booking fee for a purchase of a through ticket and a finder's fee for a split ticket purchase.

3.3 The booking fees that we saw during our purchases varied between £0.45 (per ticket) and £6.45 (per transaction). Finder's fees were between 10% and 15% of the saving made on a split ticket.

#### Including fees in the upfront price

3.4 Consistent with consumer law principles, we looked at whether TPRs included their booking and finder's fees in the upfront price.

3.5 Of the 12 TPRs that charge fees, five incorporated their fees in the upfront price and seven did not. Where mandatory fees are not included in the upfront price consumers are at risk of paying more than they expected because of the effects of drip pricing.

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### Providing a breakdown of the total price

- 3.6 It should be clear to the consumer that a fee is being charged and how much it is throughout the booking process.
- 3.7 We looked at **when** in the booking process a breakdown of the total price of the booking into component parts was shown. Of the 12 TPRs that charge fees, eight TPRs provided a breakdown of the ticket price and fee upfront, at the start of the booking process (for example at the side of the first page). The other four TPRs provided the information later or at the end of the booking process. Where a breakdown is not provided upfront, consumers may be drawn into paying fees that they have not made an informed decision to accept and so pay more for their travel than they intended or needed to.
- 3.8 We also looked at **how** the breakdown of fees was displayed at the start of the booking process by the eight TPRs that provided that information. Four of the TPRs gave equal prominence to the price of the ticket and the fee, which ensures consumers can easily identify the ticket price and cost of the fee. Four displayed the price of the ticket with greater prominence than the booking fee. All four of these retailers also did not include their fee within the upfront price, further exacerbating potential detriment to consumers.

### Good practice on displaying fees

- 3.9 Taking consumer law principles alongside our observations, good practice that we identified included where the fee:
- is given equal prominence on the webpage as the train fare or any other fees.
  - is presented in a reasonable font size so it can easily be read.

### Purchasing tickets: fees for optional fulfilment services

- 3.10 All retailers must offer at least one free option for collecting or receiving tickets, and all offered a digital or e-ticket without charge. Many also offer additional options and may charge a fee, for example for delivery by post or collection from a TVM.
- 3.11 Of the 40 retailers reviewed 21 offered fulfilment options for a fee, which were for delivery by post and/or collection by TVM. This included:

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- twenty retailers who offered delivery by post. Postage options included first class, second class or special delivery. Fees charged ranged between £1 for second class to £8.25 for special delivery.
- four retailers who charged fees for collection at a TVM, all charging £1.

3.12 Nineteen retailers did not offer any fulfilment options that attracted fees. This included:

- two retailers who offered delivery by post and did not charge for first class postage.
- ten retailers who offered collection from a TVM without a charge.

### Selection of fulfilment options

3.13 Fees for any optional services should not be pre-selected for a consumer.

3.14 We looked at whether, where there was a chargeable option, it was pre-selected by the retailer. All retailers clearly presented all fulfilment options available and their associated fees, with equal prominence given to each option and the free options listed first. In many cases, retailers pre-selected free e-ticket or collection from TVM options without charge.

### Updating the overall cost of the booking

3.15 Where an optional fee is selected by a consumer it should be immediately included in the total price displayed.

3.16 We looked at when retailers updated the total price for the booking when a fee-based fulfilment option was selected. Eleven retailers updated the total price immediately, making it clear to consumers the new total price of their booking. The other ten retailers did not update the price until either the next stage or the end of the booking process. Where fees are not included in the price at the earliest opportunity, consumers are at risk of paying more than they expected or intended to because of the effects of drip pricing.

### Additional good practice on fulfilment options

3.17 We observed two further good practice actions taken by retailers:

- several retailers placed the fulfilment options page early in the booking process. Awareness of any potential fees as early as possible in the booking process will help consumers to make more informed choices.

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two retailers included links within the booking processes directing consumers to their main website, where they could access comprehensive information about fulfilment options, including expected delivery times and what to do if tickets are not delivered.

### Information provision

3.18 There should be readily available transparent and accurate information online for consumers to read in advance of engaging with the booking process about:

- mandatory booking fees associated with ticket purchases. This should explain when fees apply, state the level of any fixed fees, and explain how variable fees are determined.
- ticket delivery options and any fees associated with each option.
- eligibility for refunds and ticket amendments, and any associated costs.

3.19 We looked at both the content and location of information provided about fees. Of the 40 retailers, only 11 provided full and accurate information in all the categories relevant to them. It was a similarly mixed picture on the ease of finding the information.

### Content of information about booking and finder's fees

3.20 Of the 12 TPRs who charge booking or finder's fees, five provided full details about their fees online. They set out when fees apply, state the level of any fixed fees and explain how variable fees are calculated, including interactions with ticket price, timing and any difference in fees between website and app purchases. This allows consumers to understand how fees will affect the price they pay to buy a ticket from that retailer and provides full transparency to consumers.

3.21 The other seven TPRs who charge booking or finder's fees did not have full or accurate information on their websites. For example, some retailers did not state their fixed fee, explain how a variable fee would be calculated and the range of variation, or explain that a different fee may be charged depending on whether the consumer booked through their website or app.

3.22 For one retailer, the information was not accurate when compared with the fees we were charged when purchasing tickets. This is an important reminder that the information provided should be full and accurate, and kept up to date.



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### Content of information about fulfilment fees

3.23 There is a disparity among retailers in the amount of information provided about different fulfilment options available to consumers and the fees. Of the 21 retailers that offer options with fees, five retailers provided full details including information on all the fulfilment options available, the associated fees and expected timeframes for postal delivery. The other 16 retailers either had incomplete information or no information available.

### Content of information about refund fees

3.24 We found all train operators and 13 of the TPRs provided full and accurate information about eligibility for refunds and ticket amendments including associated fees. However, six TPRs do not set out information about associated fees and direct consumers to find this information during the booking process. Consumers would therefore not have access to full information ahead of the booking process and this does not provide the transparency they need.

### Location of information about fees

3.25 In our review we found wide disparities in ease of accessing information on the various fees.

3.26 Train operators commonly provided information on their refund and fulfilment fees under clear headings on their main website and within a few clicks of the homepage. For example, they often provide refund information within the help section of their webpage.

3.27 However, we found other fee information harder to locate, particularly information on mandatory booking and finder's fees charged by TPRs. For example, information was often located in lengthy terms and conditions, where a consumer can only find the information by searching the term "fee". If a consumer is not able to find out about fees before entering the booking process, they will not be able to make an informed choice about their potential purchase as required under consumer law. It is therefore important for this information to be suitably prominent and not hidden on a retailer's website.

### Good practice on making information about fees readily available

3.28 Taking consumer law principles alongside our observations, good practice that we identified included:

- information on fees was **not** set out within lengthy terms and conditions.

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- information on fees was written in plain English and in a form that is easy to understand.
- an online link to a page that deals with fees, was available within one click of the home page.

### Incentive schemes

3.29 Separately to the main components of this review we also looked at incentive saving schemes utilised by retailers.

3.30 We found three retailers offering cash back schemes, which consumers could sign up to for a monetary fee. A similar sign-up process was used by all three retailers, with consumers actively needing to input all details into the cashback scheme, with no retailer automatically signing up consumers. All retailers provided information about the cost of the schemes and full terms and conditions. We are not concerned about the schemes at this time.

## 4. Conclusions and next steps

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- 4.1 Our review identified a mixed picture against consumer law principles, with some examples of good practice and some examples where improvements are needed across the range of retailers and their platforms.

### Next steps

- 4.2 Initially, we have written to seven retailers linked to concerns we held about their current practices and the possibility of harm being caused to consumers. In these letters we set out our concerns, sought to engage and promote change in the current working practices. We have requested responses in January 2024. We plan to publish our letters and the responses received on our website and will consider next steps accordingly.
- 4.3 We are disseminating this report to all rail ticket retailers. We have asked retailers to assess their offering against the consumer law principles and framework in order make changes where there are opportunities to improve the transparency of their offering to consumers. This will better assist consumers in making informed purchasing decisions. In view of this, we will carry out a further review of retail platforms in due course.
- 4.4 With over 40 online retailers, consumers have a significant choice of options for online rail ticket purchases. Therefore, we are also disseminating the report to bodies that provide consumer advice, including Transport Focus.
- 4.5 We will continue to closely follow the progress of the Digital Markets, Competition and Consumers (DMCC) Bill alongside the Department for Business and Trade's work on price transparency. Accordingly, we will consider whether further action may be needed for the rail sector considering any new proposals to tackle hidden fees online.

# Annex A: Legal and regulatory framework

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A.1 The retail of rail tickets and the charging of fees are governed by a framework of consumer protection legislation and rail industry regulation.

## Consumer protection legislation

A.2 UK consumer protection legislation requires traders to provide consumers with the information they need to make informed decisions relating to a purchase, including the provision of clear, accessible and accurate information about the price and any additional charges.

A.3 The **Consumer Protection from Unfair Trading Regulations 2008** (CPRs) prohibit unfair commercial practices, including misleading actions and omissions. They also prohibit failing to provide material information in an invitation to purchase that are likely to impact a consumer's transactional decision.

A.4 A misleading action can include providing a consumer with false information about the price of a product or the way the price is calculated, or presenting the pricing information in a way that is likely to mislead the consumer, even if the facts themselves are accurate.

A.5 The practice of drip pricing may mislead consumers. Drip pricing is when a fee is added to the advertised price of a product or service later in the purchase process, meaning the consumer does not know at the beginning of their purchase how much they will be paying.

A.6 Consumers are less likely to abandon the purchase when they discover additional fees later in the purchase process as they have already spent time making an initial decision informed by the product's base price. This means that consumers may spend more money than they initially intended and can find it difficult to compare total prices across different providers.

A.7 The **Consumer Rights Act 2015** (CRA15) is another key piece of consumer protection legislation. Two key principles of this legislation are that contractual terms should be transparent and fair.

A.8 CRA15 states that for a contractual term to be transparent, it should be written in plain and intelligible language and be legible (CRA15, section 64(3)). This has

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been interpreted in case law that a contractual term is not transparent when it is only likely to be discovered by a person looking for it.

- A.9 In terms of fairness, a contract term is understood to be unfair if it causes a significant imbalance in the party's rights to the detriment of the consumer (CRA15, section 62(4)). Under CRA15, price variation fees are not necessarily unfair because they are discretionary, however they must be clear as to what consumers can expect. It can follow that, given the general principles of transparency and fairness, it would need to be made clear where there are different price structures applicable depending on the mode of purchase.
- A.10 The [Digital Markets, Competition and Consumers \(DMCC\) Bill](#) is currently passing through the Houses of Parliament. The Department for Business and Trade published an associated [consultation](#) in September 2023 on improving price transparency, following some [research](#) into the prevalence and impact of online drip pricing. We have seen the [CMA's response](#) to this consultation which includes their position on drip pricing and the inclusion of fees in the total price. We understand that, following the consultation, the Government plans to introduce proposals to tackle hidden fees online.

## Rail specific regulations

- A.11 Retailers of rail products are subject to certain obligations in the way they sell tickets to passengers. These obligations were established at the time of privatisation and set by government to retain the benefits of an integrated, national network for passengers (such as widespread and easy access to ticketing) and to preserve commercial benefits for the rail industry (such as the ability to offer network-wide products), even where it may not always be in the commercial interest of individual train operators to do so.
- A.12 The Ticketing and Settlement Agreement (TSA) is an intra-industry agreement. It sets out specific obligations on rail retailers to act fairly and to provide information that is factual, accurate and impartial (TSA, chapter 6-30 (1) (a)). This provision is designed to provide passengers with a national network of retailing where passengers can purchase tickets from any train operator or TPR for any journey.
- A.13 There is a specific obligation that retailers 'must accurately Sell to Purchasers the Fares appropriate for the journey described by the Purchasers' (TSA, chapter 6-30 (1) (d)). Most retailers, including all train operators, interpret this to mean the fare for a through ticket from the origin to destination requested by the consumer. Some TPRs provide a service for consumers where they identify the split ticket

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options between the origin and destination of the chosen journey. The consumer can purchase these tickets in one interaction.

- A.14 The National Rail Conditions of Travel (NRCoT) are a Schedule of the TSA and form part of the ticket contract between the train operator and the consumer. NRCoT provides details of the consumer's right to a refund (NRCoT, Conditions 29 and 30), including specifying that retailers can charge an administration fee (currently up to £10) for processing the refund where the consumer has changed their mind about travelling. If the consumer is entitled to a refund due to disruption or cancellation of their train service then there is no administration fee payable.
- A.15 TPRs are licensed by the Rail Delivery Group (RDG). Reflecting the fact that there are different types of TPRs, there is more than one licence type, each with different requirements on the TPR. Licence holders are expected to comply with relevant industry arrangements. They are also required, where a fee or other charge is levied, to clearly indicate to the consumer the separate costs of the ticket and any fee or charge (Third Party Investor Licence [template](#), paragraph 5.13).
- A.16 In 2015, the ORR developed a [Retail Code of Practice](#) with industry. This provides practical guidance for train operators and TPRs on meeting consumer law and industry standards associated with the provision of information to passengers in connection with the sale and use of rail products and services.
- A.17 This Code of Practice sets out that material information for the consumer is likely to include information about the main characteristics of the product, such as ticket price, payment surcharges, booking fees, delivery or fulfilment charges, and any other unavoidable or optional charges.

## Annex B: List of retailers reviewed

Table B.1 List of train operators retail platforms reviewed

Train operators	Retail platforms
Avanti West Coast	App and website
c2c	App and website
Caledonian Sleeper	Website only
Chiltern Railways	App and website
Crosscountry	App and website
East Midlands Railway	App and website
Govia Thameslink Railway	App and website
Grand Central	App and website
Greater Anglia	App and website
Great Western Railway	App and website
Heathrow Express	Website only
Hull Trains	App and website
London North Eastern Railway	App and website
Lumo	App and website
Northern	App and website
ScotRail	App and website



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Train operators	Retail platforms
Southeastern	App and website
South Western Railway	App and website
TransPennine Express	App and website
Transport for Wales Rail	App and website
West Midlands Trains	App and website

**Table B.2 List of Third Party Retailers, retail platforms reviewed, fee types and ticket types offered**

Third Party Retailers	Platforms	Booking and finders fees	Do they offer split tickets?
MyTrains	App only	No fee	No
MyTrainTicket	App and website	Fixed booking fee	No
Omio	App and website	Variable booking fee	No
Rail Europe	App and website	Fixed booking fee	No
Railboard	App only	Finder's fee	Yes
Raileasy	Website only	Fixed booking or finder's fee	No
Railonline	App and website	No fee	No
Red Spotted Hanky	App and website	No fee	Yes
SeatFrog	App only	No fee	No
Sojo	App only	Finder's fee	Yes

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Third Party Retailers	Platforms	Booking and finders fees	Do they offer split tickets?
Split my fare	App and website	Finder's fee	Yes
Train Hugger	App and website	Fixed booking fee	No
Trainline	App and website	Variable booking fee	Yes
Trainpal	App and website	Variable booking or finder's fee	Yes
Trainsplit	App and website	Finder's fee	Yes
TrainTickets.com	Website only	Finder's fee	No
Trip.com	App and website	No fee	No
Uber	App only	No fee	No
Virgin Trains Ticketing	App only	No fee	No

We did not review all retailer websites and apps as listed with reasons below:

- Ctrip – The website is only available in Chinese.
- Eurostar – They are not governed by the TSA.
- Great Northern, Gatwick Express, Southern – All websites and booking platforms are run by GTR, for whom the Thameslink website was reviewed.
- London North Western Railway – Their website and booking platforms are run by West Midlands Trains, who were reviewed.



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