

By email

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Dear Mr McBrinn,

Proposed changes to Schedule 17 of the Ticketing and Settlement Agreement

We have received 1550 responses to the Schedule 17 notice.

- **Petition signatures** – 94 (Clydebank – 24, Kilwinning – 63, Pitlochry – 7)
- **Individuals** – 1027
- **Pre-paid post cards** – 90
- **Survey** – 252 (Disability Equality Scotland)
- **Other correspondents** – 87 (MSPs, MPs, political parties, regional transport partnerships, local authorities, individual councillors, community councils, organisations representing disabled people, trade unions, rail user groups and transport organisations)

We are also aware of the [online petition](#) that has received 2890 signatures.

All but twenty of 1,550 responses raised concerns and opposed the changes. Four of the twenty respondents who supported the changes did so on the basis that the proposal if implemented would see an increase in the current opening times of the ticket office at their local station.

Issues raised will be outlined in the closing section of this letter. Data issues will be dealt with first.

Sales data

Thank you for providing average ticket sales data covering an eight-week period from October – December 2019. We have received comments that data submitted during travel restrictions imposed as a consequence of the pandemic would be unrepresentative of sales. However, we note that the data provided is from representative weeks prior to any travel restrictions coming into force.

Specific questions were asked about sales over the summer period for tourist destinations and whether this has resulted in any localised peaks that exceed the published levels. We would seek assurances from ScotRail on this point.

Volume of ticket sales

We are mindful of guidance on major changes to ticket office opening times. This guidance states that applications would only usually be accepted where sales are below 12 tickets per hour.

Now that we have been able to take a detailed look at the sales data provided, we believe that there are instances where ticket office closure has been recommended where sales are at or over the twelve ticket per hour threshold. These are listed below:

Bellshill

Monday - Thursday: keep open until 1400 rather than 1310. Transactions between 1300 and 1400 average 12 per hour.

Cambuslang

Monday - Thursday: keep open until 1345 rather than 1330. Transactions between 1245 and 1345 average above 12 per hour.

Clarkston

Monday - Saturday: keep open until 1345 rather than 1330. Transactions between 1245 and 1345 average above 12 per hour.

East Kilbride

Sunday: keep open until 1720 rather than 1650. Transactions between 1620 and 1720 average above 12 per hour.

Easterhouse

Friday: keep open until 1200 rather than 1130. Transactions between 1100 and 1200 average 12 per hour.

Elgin

Friday: keep open until 1800 rather than 1745. Transactions between 1700 and 1800 average above 12 per hour.

Garscadden

Saturday: keep open until 1500 rather than 1415. Transactions between 1400 and 1500 average 12 per hour.

Glengarnock

Monday – Thursday: keep open until 1200 rather than 1050. Transactions between 1045 and 1200 average above 12 per hour. Friday: keep open until 1330 rather than 1150. Transactions between 1150 and 1330 average above 12 per hour. Saturday: open at 0845 rather than 0910. Transactions between 0845 and 0945 average above 12 per hour. Saturday: keep open until 1400 rather than 1350. Transactions between 1300 and 1400 average above 12 per hour.

Hamilton Central

Monday – Thursday: keep open until 1700 rather than 1645. Transactions between 1600 and 1700 average 12 per hour.

Hyndland

Monday – Friday: keep open until 1915 rather than 1900. Transactions between 1815 and 1915 average above 12 per hour. Saturday: keep open until 1930 rather than 1900. Transactions between 1830 and 1930 average above 12 per hour.

Kilmarnock

Monday – Thursday: keep open until 1800 rather than 1730. Transactions between 1700 and 1800 average 12 per hour. Friday: keep open until 1945 rather than 1900. Transactions between 1845 and 1945 average above 12 per hour.

Kilwinning

Monday – Thursday: open at 0605 rather than 0640. Transactions between 0605 and 0705 average above 12 per hour.

Larbert

Monday – Thursday: keep open until 1845 rather than 1830. Transactions between 1745 and 1845 average 12 per hour.

Linlithgow

Saturday: open at 0700 rather than 0830. Transactions between 0700 and 0830 average above 12 per hour.

Mount Florida

Monday – Thursday: keep open until 1700 rather than 1645. Transactions between 1600 and 1700 average 12 per hour.

Pollokshields East

Monday – Saturday: keep open until 1344 rather than 1320. Transactions between 1244 and 1344 average 12 per hour.

Queens Park

Saturday: keep open until 1730 rather than 1645. Transactions between 1630 and 1730 average 12 per hour.

Rutherglen

Friday: keep open until 1830 rather than 1815. Transactions between 1730 and 1830 average above 12 per hour. Sunday: open at 0900 rather than 0910. Transactions between 0900 and 1000 average above 12 per hour. Keep open until 1830 rather than 1750. Transactions between 1730 and 1830 average above 12 per hour.

Stonehaven

Monday – Friday: open at 0700 rather than 0710. Transactions between 0700 and 0800 average above 12 per hour.

Wemyss Bay

Monday – Thursday: keep open until 1245 rather than 1230. Transactions between 1145 and 1245 average 12 per hour.

Westerton

Sunday: keep open until 1530 rather than 1500. Transactions between 1430 and 1530 average 12 per hour.

The proposal should be amended to reflect the above findings.

Ticketing and Settlement Agreement (TSA)

Changes to ticket office opening hours are governed by clause 6-18 of the TSA. This is a regulatory document – it is a condition of an operator's licence that they abide by it. *It is important to note that the TSA only covers the act of buying tickets at an individual station.* An operator can propose a change to ticket office opening hours at a station if:

(a) the change would represent an improvement on current arrangements in terms of quality of service and/or cost effectiveness and

(b) members of the public would continue to enjoy widespread and easy access to the purchase of rail products, notwithstanding the change.

Transport Focus was advised in July 2021 that ScotRail were considering an application under the terms of the TSA to propose changes to ticket office opening times. Our (only) role during this period was to advise ScotRail of the requirements of the regulatory process before proceeding with any application.

ScotRail advise that this led to the original proposal being amended before publication.

We are satisfied that ScotRail has complied with the requirements of the regulatory process. For example, posting notices about the proposed changes at the ticket offices affected, asking for comments. We are conscious the consultation took place when fewer people were travelling due to covid travel restrictions. However, we recognise ScotRail acted upon our recommendation to publicise the consultation more widely (exceeding the regulatory requirement); website, social media channels and informing stakeholders.

This has resulted in Transport Focus receiving over 1,500 comments, in a 21-day consultation window, when less people were travelling, indicating the importance of this consultation to people across Scotland. We acknowledge concerns raised at the relatively short consultation period. However, we accept that ScotRail were following the process and timescale as set in the TSA (regulation).

We think it would be far better if the regulation shifted from ticket office opening hours and moved to station staffing hours. That would give passengers some protection and reassurance about staff presence while allowing the operator more discretion over how tickets are sold. This would allow decisions on retailing to be about retailing rather than about staffing. By doing so the process would recognise that selling tickets from a ticket office is only one of many valuable roles that station staff undertake.

The consultation document acknowledges opening hours for ticket offices have largely remained unchanged in over 30 years. During that time, the way many passengers buy their ticket has been steadily changing. Increasing numbers of passengers have been benefitting from the changes and choosing to buy online, buy onboard train, from Ticket Vending Machines (TVMs), use smartcards or use apps because of the convenience offered. This has seen ticket office sales reducing steadily over that 30-year period to providing twenty eight per cent of ticket sales in 2019.

The proportion of tickets purchased through traditional station ticket offices is likely to continue falling, a trend seemingly accelerated by the Covid-19 pandemic. However, it should be recognised that sales from ticket offices based on 2019 data represent the most popular way to purchase a ticket.

ScotRail ticket office consultation - national conversation to shape the future for rail

During the period of the consultation ScotRail will be aware of the Scottish Government announcement to begin a national conversation about what a new beginning for ScotRail should look like to provide a customer focused rail passenger service.

Transport Focus believes this conversation should include ScotRail listening to the concerns expressed by passengers and stakeholders replying to this consultation. ScotRail should then articulate how those concerns will be addressed, prior to the implementation of the proposals.

Comments received show widespread concerns about buying a ticket but also wider concerns, including accessibility, access to NHS hospitals, anti-social behaviour, station facilities, ticket office closures, subterranean stations and tourism.

In proposing changes to ticket office opening hours, we are aware that ScotRail have carried out an assessment of all ticket sales, passenger assistance, ticket buying facilities, waiting areas, toilets, passenger footfall, links to local schools, colleges and businesses for every station with a ticket office. ScotRail has also reviewed any instances of anti-social behaviour to understand whether the proposed changes affect the customer experience and that passengers will always receive the best value ticket regardless of how they choose to purchase.

The consultation document states that the proposal will improve staff visibility, increase passenger assistance and will use the valuable staff resources that ScotRail have in the best way for the greatest benefit for passengers.

The narrow focus of the TSA consultation did not give an opportunity for passengers' wider concerns about staffing to be addressed. We believe these should be picked up in the national conversation. This would:

- 1) enable passengers and stakeholders to provide specific feedback on how the proposals impact their experience compared to ScotRail's current ticket office opening hours
- 2) afford ScotRail the opportunity to provide sufficient detail that address concerns raised and respond to the concerns made prior to the proposals being implemented.

Comments raised during consultation

The comments received fall into eight broad categories that are discussed below.

Buying a ticket

The reality is that some passengers wish to buy their ticket from another human being. This is not only a matter of personal preference, its often for hard, practical reasons about being guided to the right ticket, the right route, giving confidence that the most appropriate ticket for the journey has been purchased. Comments received illustrate this reality:

“The personal approach is extremely important and I would hate it if I could no longer buy tickets from a real person easily”

“ticket office has always had very friendly ticket office staff, who give a really positive experience reflecting so well on Scotrail, encouraging the public to use your services”

“Nothing works better than the opportunity to speak to a person face to face when buying tickets or seeking travel information, myself and many others I know feel that the reassurance speaking to a member of staff who is skilled and knowledgeable in their area such as ticketing is invaluable”

“ticket office staff often are aware of better deals than those offered by the internet or, in particular, by ticket vending machines (TVMs)”

“Cuts to ticket office hours ignore the wide range of advice, services and assistance passengers get at the ticket office which cannot be replicated by machines or online ticketing. For example, these machines cannot give advice on best fares, complex journeys or give discounts on the National Entitlement Card”

We note that ScotRail has installed 355 TVMs, accounting for twenty six percent of ticket sales. TVMs clearly have an important role to play in retailing tickets, and yet it is equally clear from comments received that some passengers still have concerns about using them. Some passengers do not find TVMs particularly user-friendly, requiring a degree of prior knowledge of the fares structure which some passengers do not possess. Although TVMs sell a wide selection of tickets, it should be noted they do not sell all tickets. Comments received include:

“Electronic ticket machines just now are not as good or accessible as they can be for people with learning disabilities. The writing can be too small, navigation of the machines is difficult, and we would rely on support at the station”

“Ticket machines can be slow, causing queuing at busy stations at peak times.... the number of ticket machines needed at stations should be reviewed where ticket office hours are to be reduced”

“Unlike station staff TVM’s are simply not designed to help passengers decide between peak and off-peak tickets and many passengers do not understand the complexity of the ticketing system. This leaves passengers with the option of purchasing a more expensive ticket or risk travelling with an invalid ticket”

“ticket vending machines are not accessible for some disabled people, which again stresses the importance of having a physical staff presence”

“A ticket vending machine doesn’t think out of the box. Having booking office staff to give tailored advice to the passengers needs is vital eg overnight returns, kids go for a pound, concessions, groupsaves”

As illustrated above many concerns were raised about the availability of certain ticket types. These include, groupsave, local authority concession tickets and Strathclyde Zone cards. TVMs will often sell passengers who are unaware of ticketing rules full standard price tickets at off-peak times - even when off-peak extends to the whole validity of the ticket, e.g. at weekends.

Based upon the comments received and previous insight, **Transport Focus recommends:**

- TVMs should display only the tickets that it is appropriate to sell at the time in order that passengers do not buy a more expensive ticket than they need at present
- TVMs should offer the GroupSave price when a passenger seeks to buy three or four tickets for a journey where that product is offered
- TVMs should be programmed to allow the purchase of concession tickets and zone cards
- TVMs should be programmed to allow off-peak fares to be sold early enough for passengers to buy one and board the first off-peak train
- Consider using the A-Z destination finder with clear information about peak time/restrictions as a first step with preset hot destinations as another option
- Consider using more screens with simplified steps (in the form of easy to answer questions)
- Extend the timed-out period or offer the option of more time to confirm or complete a transaction
- Provide clearer communication of restrictions to increase purchasing confidence
- Indicate when the best fare has been achieved and when it is valid or if a cheaper fare is available for the ticket requested
- Provide a clear confirmation summary of the ticket being purchased prior to completion of the transaction (especially an explanation of what is not included)
- Give further consideration to the specific needs of disability groups, including screen layout and the potential for audio/video assistance function

- TVMs should be in an accessible location providing the ability to purchase tickets from first to last service
- Consideration to the needs of passengers who rely on cash transactions. Many TVMs do not accept cash. In such instances people can continue to buy onboard and be offered the full range of tickets and railcard discount
- Consideration to installing TVMs at stations where currently there are none and the ticket office opening hours are being reduced

The consultation notes that increased usage and familiarity of the internet has opened up an entirely new retail channel, accounting for 18 per cent of ticket sales in 2019. While recognising the increased spread of the internet and the convenience offered, it must take account of the needs of all users, and there is still a limit to the extent to which online sales channels can provide an acceptable alternative to ticket offices. Comments received include:

“Large areas of rural Scotland have poor or no broadband/mobile signals and as such people tend not to own mobile devices. (Indeed the Primary School at Libberton receives just 0.48 mbps). As this situation removes the ability of intending rail passengers to pre-book or use on-line ticketing, the ability to visit a ticket office to prebook longer distance journeys is a valuable asset that many would not wish to see removed”

Transport Focus recommends that all stations that have poor connectivity should have access to a TVM.

ScotRail wishes to repurpose the staff who work in stations at times when it is no longer busy. However, repurposing staff based upon the number of ticket sales at a station is an overly narrow metric. This has unintended consequence of providing a lack of consistency that runs the risk of confusing passengers as to when the ticket office is actually open.

For example, the consultation proposal for Saltcoats ticket office indicates that it will open at, 06:45 – 12:00 Monday to Thursday, 07:30 – 14:15 Friday, 08:15 – 16:00 Saturday and 10:15 – 13:00 Sunday. We suggest having four different opening and closing times in a seven-day week does not offer a consistent retail environment for passengers. There are many such instances contained within the proposals.

Transport Focus recommends ScotRail considers amending the proposal at all stations where this is the case. This would ensure a more consistent set of ticket office opening times is presented to passengers but should not further reduce the overall times ticket offices are open.

Given the above concerns relating to buying a ticket Transport Focus recommends that ScotRail explains how passengers will always receive the best value ticket regardless of how they choose to purchase.

Accessibility (A Visible Staff Presence)

The consultation document states that passenger assistance will be increased beyond ScotRail’s largest stations, provided by repurposed staff who will form mobile teams. We welcome this commitment to increase passenger assistance but require further detail on how this will be achieved through the deployment of mobile teams.

Respondents to the consultation proposals and Transport Focus insight have consistently highlighted passengers value a visible staff presence at stations to ensure assistance is provided. The concept of mobile teams is that they will be mobile and by that very fact cannot be present at every station where staff are currently located. This raised the following concerns:

“People who are not physically able need assistance actually boarding and disembarking the train, however the proposed changes will take staff away from stations and rule this out as a possibility”

“The ticket office provides a central location where passengers know they can easily go to for advice and assistance and closing the ticket office for more of the day removes access to this central hub. This will be particularly damaging for disabled and elderly passengers, who may particularly value the assistance of staff and may struggle to locate staff at the station if the ticket office is not open”

“Already, disabled people are less likely to use the railways, and these substantial cuts would worsen accessibility by significantly reducing the times that disabled and elderly passengers could guarantee that staff will be present at the station”

“Reducing opening times/closing ticket offices will make it more difficult for those requiring assistance to board trains and for some impossible”

In addition to the above concerns many respondents asked if an Equalities Impact Assessment had been conducted to inform the proposals as the consultation is silent on this point. Transport Focus understands that ScotRail has or is in the process of completing a Disability Impact Assessment for every station affected by the proposals.

Transport Focus recommends:

- 1) ScotRail provide sufficient detail on how the deployment of mobile teams replacing fixed station staff will increase passenger assistance
- 2) ScotRail publish the results of the Disability Impact Assessment(s) prior to the implementation of the proposals

Access to NHS Hospitals

Comments have been received raising concerns about access to NHS hospitals from stations where proposals to reduce the ticket opening office hours at; Dalmuir, Hyndland, Mount Florida and Wishaw could have a negative impact on travelling between the respective station and the hospital it serves.

“Hyndland is the closest station to Gartnavel hospital and many patients use it to travel to and from the hospital. Given the nature of the treatment provided at the hospital, many of these patients are vulnerable and should not be expected to have to stand on the platform waiting for their train. If the waiting room is closed, there is only one metal bench outside and no protection (other than a few awnings around the roof of the station and a cover over one of the ticket machines) from the wind/rain”

“Hyndland is one of the ten busiest stations in Scotland and the fourth busiest station in Glasgow. It serves the Gartnavel campus which comprises Gartnavel Hospitals (both general and psychiatric hospitals), NHS Centre for Integrative Care, the Beatson (which provides both inpatient and outpatient care and treatment for people with cancer) and the Maggie’s Centre (which provides support for those with cancer and their relatives). As such it is well used not only by patients and their relatives (who may be leaving hospital visiting after 8pm) but also by hospital staff, many of whom work shifts and so will be using trains early in the morning and late in the evening”

“I am against the shortening of hours at Mount Florida train station as this would mean the lift will not be open for those who need it when the office is closed. Those who have an unseen disability, example, cancer, can’t use steps. As someone who had cancer, I relied on lifts as it took a lot of strength to use those stairs. Victoria hospital is near and is used by many outpatients. Cancer, those who need scans and minor injuries”.

In proposing changes to ticket office opening hours, we are aware that ScotRail have carried out an assessment of passenger footfall, links to local schools, colleges and businesses for every station with a ticket office.

Transport Focus recommends that the assessment in relation to stations serving NHS hospitals meets the needs of passengers travelling to/from those locations.

Anti-Social Behaviour (ASB) (A Visible Staff Presence)

The consultation document states that ScotRail will collaborate with British Transport Police (BTP) in managing ASB. We welcome this commitment to continue collaboration with BTP but require further detail on how this will manage ASB.

Similar to the concerns raised regarding accessibility responses to the consultation proposals and Transport Focus insight have consistently highlighted passengers value a visible staff presence at stations to deter ASB. Concerns raised include:

“As a woman traveller I am reassured by the presence of staff in the few cases where personal safety could be threatened. Regularly on my travels, unless a train has just arrived or departed, the only person who is visible is the person in the ticket office”

“As for safety I have previously had bad experiences at Wishaw station where a group of teenagers hanging about at the station threatened and spat on me. On this occasion the woman working in the station came out of the office and the kids ran away. If she had not been there who knows what would have happened, I certainly wouldn’t have felt safe using the station as much as I do currently”

“Also sometimes at night, especially travelling from this station, it can be quite frightening due to young groups of youths hanging around and the fact the office is open and there is a member of staff there to help if needed makes me feel much safer”

“The anti-social behaviour involving youths between Port Glasgow and Wemyss Bay is horrendous. This is worst in the summer evenings. Vehicles are regularly damaged, staff threatened or attacked, and many youths congregate at the terminal station. Having staff present is critical for the safety of both the public and employees”

Staff at stations can help provide a reassuring human presence. This can positively impact passenger perceptions of security and function as a deterrent to crime and disorder.

When we previously asked passengers what could allay some of those concerns, passengers consistently identified staff presence as the key.

ScotRail needs to consider how it can best deploy staff across the rail network to meet this need as it could jeopardise some passengers’ confidence in their ability to get to their destination safely.

Transport Focus recommends ScotRail provides further detail on how the collaboration with BTP will manage ASB and allay passenger concerns of security within the station environment.

Station Facilities

The consultation document when considering the station environment fails to reference access to station facilities that people consider to be important.

At many stations affected by the proposals, access to facilities is often dependent on a member of staff being on the station. A consistent refrain from responses is that access to lifts, toilets, waiting rooms, food outlets/kiosks and information leaflets and timetables will be reduced as a consequence of the proposals.

Transport Focus recommends that ScotRail should provide details of the assessment undertaken on the above station facilities explaining what changes passengers may experience in the provision of these facilities. We are particularly concerned about accessibility in relation to lifts and accessible toilets.

Many respondents cited the inadequate provision of shelters on station platforms in the event of waiting rooms being closed. **Transport Focus recommends** that adequate station shelters be provided at each station affected by these proposals.

We recognise that ScotRail is taking a number of steps to improve the accuracy and timeliness of passenger information with station information boards providing real-time updates on train times, including the station at which they stop and highlight delays where applicable. Although staff may not be the first port of call for basic information about straightforward delays, passengers do turn to staff when the information screens and recorded announcements prove to be inaccurate or if more tailored/detailed information is required.

Respondents to the consultation noted that ticket office staff are often seen performing other duties such as de-icing platforms and snow clearing. Transport Focus is concerned that by reducing ticket office opening hours these duties will not be covered. We understand that some can be done by mobile teams but would like reassurance that this will be covered fully.

At some stations access and egress to the station car park is via token and/or cost of parking ticket refunded at the ticket office. Transport Focus would like reassurance on how this will be applied in future given the proposed changes.

We would like to be advised if ScotRail has made an assessment on the potential for increased use of help points and reliance on CCTV as a consequence of the proposed changes?

Ticket Office Closures

We note the proposal to close the ticket offices at Cartsdyke, Clydebank and Woodhall. Having checked the sales data for all three ticket offices we can only conclude that ticket sales do not meet the criteria for the ticket offices to remain open.

However, many respondents have asked ScotRail to reconsider the closure proposal in light of regeneration initiatives.

Cartsdyke - The area adjacent to the station has been subject to significant new housing redevelopment as the economic landscape of Inverclyde has changed and, whilst footfall is relatively low, notwithstanding increased footfall due to Greenock Morton football matches at the nearby Cappielow Park, a staffed presence could help to retain, and potentially grow, patronage. The station also lies within an identified lowest 20 per cent Scottish Index of Multiple Deprivation (SIMD) area and there could be perceived safety issues given the station's relatively remote location with limited passive surveillance from surrounding streets or buildings and within a partial cutting.

Clydebank - The station fulfils a key access function to the town, particularly to existing town centre facilities but also to newer developments along the river frontage south of the station including the West College Scotland Clydebank Campus, Health and Care facilities including the Clydebank Care Home (opened in 2020) and the recently relocated Clydebank Health Centre (which we understand will open later in 2022). These facilities will be enhanced in future by leisure, recreation and residential developments, all of which will potentially increase footfall at the adjacent Clydebank rail station and interchange. Issues such as existing bus and rail interchange should also be considered given the proximity of local and longer distance bus stances adjacent to the rail station. In addition, the station lies within an identified lowest 20 per cent SIMD area.

Woodhall - In many ways Woodhall is not dissimilar to Cartsdyke in relation to changes in travel patterns and land use over the years. There has been a loss of employment opportunities and some housing stock depletion but there has also been some newer housing established close to the station. Similar to both Clydebank and Cartsdyke, Woodhall also lies within an identified lowest 20 per cent SIMD area and again there could be safety concerns given the station's relatively remote location with limited passive surveillance from surrounding streets or buildings.

Transport Focus recommends ScotRail reconsiders the decision on closing the above ticket offices, examining the wider impact of closure with potential local redevelopment opportunities.

Subterranean Stations

Concern has been expressed at the proposed reduction in ticket office opening times at these stations, some of which have no step free access. ScotRail should pay particular note to the Disability Impact Assessment and wider implications for passenger safety and security.

Tourism

Respondents noted that in a post pandemic setting its anticipated that leisure travel will show the quickest recovery. Locations geographically diverse across the length and breadth of Scotland (Balloch, Girvan, Inverclyde, Leuchars, Thurso, Wick) can envisage growth in tourism. Rail travel is being promoted as a vital aspect of sustainable tourism.

Rather than consider a reduction in ticket office opening hours at stations where leisure travellers include tourists, has ScotRail considered partnering with Visit Scotland to explore possible shared use of the current ticket office facilities. This would include a possible extension to the ticket office to become a travel/tourism hub, where people come not only about travel information but also tourist and visitor information.

Conclusion

We are guided in our response by the regulatory process. The TSA only allows Transport Focus to look at the act of buying a ticket from the ticket office in isolation and not at the wider role of staff at a station.

Being mindful of the regulatory process Transport Focus has no objection to the proposals based on the sales data submitted as part of the consultation (subject to the specific individual ticket office amendments as detailed) and the continuing access to the purchase of rail products.

However, there remains great uncertainty about whether changes as a consequence of the pandemic in rail travel demand and behaviour will be sustained. Transport Focus insight during the pandemic shows that giving people confidence, making them feel safe is important to encourage more people to travel by rail.

ScotRail in considering and responding to the recommendations and concerns raised in this consultation exercise must ensure that the review of ticket office opening hours informs the national conversation objective of delivering a customer focussed passenger railway.

Yours sincerely

Robert Samson

Robert Samson

Senior Stakeholder Manager

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