

Mr Phil Campbell
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ScotRail
Atrium Court
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23 February 2022

Dear Robert,

Proposal to amend ScotRail ticket office opening hours

I write with reference to our proposal to amend ticket office opening times at 120 ScotRail stations and specifically in response to the correspondence of 15 February 2022 that you kindly shared after the public consultation.

I'd like to place on record my thanks to you and your team for the professional and supportive manner in which you have carried out this consultation. You have acted in the best interests of customers at all times, which has improved the ultimate outcome.

I note Transport Focus received 1,550 responses to the public consultation, and that feedback was broadly captured in eight areas:

- 1. Buying a ticket
- 2. Accessibility
- 3. Access to NHS Hospitals
- 4. Anti-Social Behaviour
- 5. Station Facilities
- 6. Ticket Office Closures
- 7. Subterranean Station
- 8. Tourism

In response to the consultation feedback and following through on the commitment ScotRail had given to listen to customers and interested parties, our detailed response is below.

Review of ticket sales data

Transport Focus reiterates that it is guided in its response by the regulatory process. The Ticket Settlement Agreement (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 below) and the continuing access to the purchase of rail products.

Based on a detailed review of sales data, Transport Focus identified 21 instances where ScotRail's proposed ticket office times should be amended. ScotRail accepts this recommendation, and the amended proposals are displayed in the table below:

	Current Booking Office Hours		Proposed Booking Office Hours				
	Monday -			Monday -			
Station Profile	Friday	Saturday	Sunday	Thursday	Friday	Saturday	Sunday
Bellshill	0620-2004	0620-2004	0910-1645	0630-1400	0630 - 1950	0630 - 1950	0910 - 1650
Cambuslang	0620-2204	0620-2204	0910-1645	0650- <mark>1345</mark>	0650-1800	0650-1800	0910-1650
Clarkston	0640-1344	0640-1344	Closed	0650- <mark>1345</mark>	0650-1345	0650-1345	Closed
East Kilbride	0600-2325	0700-2325	0940-1720	0600-1920	0600-2000	0730-2030	0910-1720
Easterhouse	0550-1938	0550-1938	Closed	0630-1130	0630-1200	0845-1600	Closed
Elgin	0625-1930	0625-1930	1025-1805	0700-1700	0700-1845	0645-1615	0945-1630
Garscadden	0620-2025	0620-2025	Closed	0620-1040	0620-1040	0915-1500	Closed
Glengarnock	0715-1419	0715-1419	Closed	0710- <mark>1200</mark>	0710-1330	0845-1350	Closed
Hamilton Central	0620-2320	0620-2320	0910-1630	0645-1700	0645-1915	0730-1915	0910-1650
Hyndland	0610-2330	0610-2330	0810-2335	0610-1915	0610-1915	0610-1930	0810-1750
Kilmarnock	0630-2335	0630-2335	1015-2330	0630- <mark>1800</mark>	0630-1945	0715-1815	0910-1650
Kilwinning	0605-2330	0605-2330	0850-2330	0605-2000	0640-2000	0640-2000	0850-1900
Larbert	0700-2054	0700-2054	Closed	0630- <mark>1845</mark>	0630-1900	0745-1900	Closed
Linlithgow	0600-2300	0600-2300	0815-2300	0600-1930	0600-1930	0700-1800	0815-1900
Mount Florida	0650-2110	0635-2140	0910-1650	0645-1700	0645-1745	0830-1645	0910-1650
Pollokshields East	0640-1344	0640-1344	Closed	0640-1320	0640-1320	0640-1345	Closed
Queens Park Glasgow	0640-2100	0620-2120	Closed	0630-1445	0645-1530	0730-1730	Closed
Rutherglen	0625-2315	0625-2315	0825-2315	0625-1815	0625-1830	0745-2000	0900-1830
Stonehaven	0710-1855	0800-1504	Closed	0700 -1800	0700-1800	0800-1500	Closed
Wemyss Bay	0610-2320	0610-2320	0855-2130	0610- <mark>1245</mark>	0610-1330	0700-1430	0855-1330
Westerton	0630-2053	0630-2053	0910-1650	0630-1930	0630-1930	0630-1930	0910-1530

Note: Transport Focus recommended Elgin stay open on Friday until 1800 rather the 1745. ScotRail's original proposal was that Elgin would open 0700-1845, therefore no amendment is needed for this station.

A total of 33 hours per-week will be added back in response to this recommendation.

Buying a ticket

Transport Focus recommended making various improvements to our ticket vending machines in lieu of a staff member being available to sell tickets at the ticket office, particularly with reference to product offerings and functionality.

ScotRail will commit to reviewing the functionality of our ticket machines in regard to both ticket availability and customer accessibility. However, it should be noted that due to current regulations, some products cannot be made available on our ticket machines as they require photo identification:

- Concession tickets
- Zone Cards

It should be noted that concession tickets can be purchase on-train by a member of staff while Zone Cards can be purchased online and at other available retail outlets as specified by SPT (www.spt.co.uk).

Consideration should be given to whether ticket vending machines are in an accessible location from first to last service and if they will be made available in all stations where operating hours are being reduced.

As part of the ticket office review, ScotRail carried out a comprehensive assessment of all staffed stations. This assessment included evaluating the accessibility and availability of ticket machines in stations:

- A total of 20 stations where we propose changes to the opening hours do not currently have a ticket machine. However, it should be noted that while opening hours will change, 11 of these stations will continue to have staff available during the current opening times, and staff will be on hand to sell tickets if required. The staff will simply move from behind the glass in the ticket office to the station platform. Due to lack of demand, we currently have no plans to install additional ticket machines at the remaining nine stations impacted, however this will be reviewed, and action taken if necessary.
- 18 stations impacted by the proposed changes have ticket machines that are currently located in the ticket office or concourse. However, all of these stations will remain fully accessible to customers outside of the proposed opening times. This is because stations will either remain staffed beyond the ticket office 17 hours, or the station building will remain open and accessible even when staff aren't present due to remote locking.

Transport Focus recommends that all stations with poor connectivity should have access to a ticket machine

All remote stations included in the ticket office review that could be impacted by poor connectivity (Dingwall, Kingussie, Kyle of Lochalsh, Nairn, Pitlochry, and Wick) will remain staffed beyond the ticket office opening hours. This means that customers still have the option to purchase tickets at the station if unable to do so prior to travelling.

Consider more consistency for opening hours at stations where the proposed timings change each day

ScotRail has proposed amended opening hours, which are based on ticket issuing data and are designed to meet the needs of our customers. The various opening times throughout the week ensures we meet demand. For example, our stations often experience a noticeable increase in ticket issues on Friday or Saturday evenings. ScotRail has responded to this demand by extending opening hours during these times. By providing more consistency in our opening hours, we risk wasting staff resources by having staff in a ticket office during times when the station is not busy. ScotRail will therefore amend the opening hours as per our original proposal, taking into account the required amendments at 21 stations as stipulated by Transport Focus.

Accessibility

ScotRail to provide sufficient detail on how deployment, if mobile teams replacing fixed staff, will increase passenger assistance

ScotRail is committed to providing assistance to anyone who needs it. It was therefore important to closely consider staffing levels at all stations included in the ticket office opening hours review, and the impact our proposals would have on passengers requiring assistance.

As part of our Diversity Impact Assessment (DIA), ScotRail carried out detailed analysis of booked passenger assists from April 19 - March 2019. ScotRail not only looked at the volume of passenger assists at each station, but also the timings of bookings and what impact the proposed changes would have on these bookings.

By applying the proposed ticket office opening hours to 2019 passenger assist data, ScotRail identified a total of nine stations where the number of booked assists, outside of the proposed opening times, would increase significantly as a result of our changes. ScotRail therefore made the decision to continue to staff the following stations during times where passenger assist bookings were higher:

- Aviemore
- Bellshill
- Blairhill
- Cambuslang
- Falkirk Grahamston
- Kingussie
- Lanark
- Largs
- Montrose

The proposed ticket office opening hours will remain the same, however ScotRail will commit to extending the staffing hours at these stations during periods where numbers of booked assistance are high. Amending the ticket office opening hours will remove the need for staff to be behind the ticket office window when the station is less busy and means staff will instead be able to focus on other key duties such as passenger assistance and customer enquiries on the platform. By amending our original proposal in response to our Diversity Impact Assessment (DIA), a total of 167 hours — or five full time equivalents (FTE) - were added back in, this will ensure ScotRail have staff available when customer assistance is required.

It should also be noted that ScotRail has made the decision to continue to staff a further 49 stations, beyond the schedule 17 hours. These stations, listed in Appendix 1, this will deliver more flexibility, enabling staff can carry out face-to-face duties on the platform, including assisting any customers who require it, and removes the need to be in the ticket office.

It is important to note that on-train staff are also available to provide assistance to anyone who needs it. Removing staff from a ticket office to carry our front-line duties on the network will not remove the ability to receive assistance when boarding and leaving our trains.

Transport Focus recommends that ScotRail publish the DIA prior to implementation

ScotRail is continuing to carry out a Diversity Impact Assessment (DIA) in line with the schedule 17 review and will take comments and recommendations from the consultation into consideration as part of the process. Once all comments and recommendations are considered fully, ScotRail will publish an executive summary.

Access to NHS Hospitals

Transport Focus recommends that ScotRail assess stations serving the needs of NHS hospitals to ensure the proposed opening times continue to meet the needs of passengers travelling to and from those locations.

ScotRail will improve its proposal for stations that serve hospitals by maintaining current staffing hours at Dalmuir and Hyndland. ScotRail will also agree to open Wishaw ticket office on a Sunday, giving a seven-day staff presence. This is an increase on the opening hours at that station today.

Anti-social behaviour (ASB)

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

The safety and security of our customers and staff is ScotRail's number one priority. We believe that by actively targeting anti-social behaviour, we can proactively work to make our rail network safer.

In the past three months, ScotRail has introduced a Travel Safe Team. Since the beginning of December, the Travel Safe Team has targeted a number of stations and routes within Inverclyde, Ayrshire, Lanarkshire, Glasgow and Dunbartonshire, and have seen a drop in reported events during and after the anti-social behaviour exercises. In the past three months, the Travel Safe Team has reported a total of 447 interventions to date. This is significantly higher than the number of recorded interventions in 2019 from ticket office staff (a total of 311 incidents relating to stations were recorded across the 117 stations in 2019).

From the 447 interventions from the Travel Safe Team in three months, only four events have required the assistance of the British Transport Police. Passengers and members of the public have complied with requests and changed their behaviours or left the network. We believe that by creating three new mobile teams and providing staff with the support, resources, and time to actively support customers, we are making the rail network a safer place for everyone.

Our mobile teams will collaborate with our Security Manager, the Travel Safe Team, and the British Transport Police to identify key focus points in stations and on trains to provide support in tackling anti-social behaviour, with a particular focus on vulnerable people. Staff will be provided with relevant training to carry out these duties safely and effectively.

Station facilities

ScotRail should provide a detail of the assessment undertaken on station facilities and what changes passengers may experience in the provision of these facilities.

A comprehensive review of all station facilities was undertaken as part of the ticket office opening hours review.

Accessible toilets – Of the 120 stations impacted by the review, 69 stations have accessible toilets. Forty-three of these stations, however, will remain open to customers beyond the proposed amended ticket office opening times. As a result, there will be no impact to the accessibility of toilets at these stations.

The remaining 26 stations with accessible toilets will be impacted (appendix 2). However, ScotRail will review options and commit to ensuring all station toilets remain unaffected, through implementing remote locking systems. ScotRail will take into consideration feedback from users, staff, and the British Transport Police, as well as revieing our own data.

Lifts – Of the 120 stations impacted by the review, 26 stations have lifts. Fifteen of these stations will continue to have the same staffing availability as they do today, despite the ticket office opening

hours changing. This means there will still be a staff presence at the station. Further analysis identified that almost all station lifts impacted in this proposal currently operate outside of current staffing times. We will therefore work with our CCTV teams to ensure all lifts impacted by our proposals can be operated remotely and will be covered by 24/7 CCTV coverage.

Shelters – Despite the proposed ticket office opening hours changes, each station will continue to have an available shelter or canopy. However, ScotRail understands that changes to ticket office opening times will impact the accessibility of waiting rooms at some stations outside of the proposed opening hours. ScotRail is taking this under review, analysing each station on a case-bycase basis and taking into consideration public response, feedback from staff and the British Transport Police, in addition to anti-social behaviour incidents and current shelter facilities with a commitment to deliver on the current waiting rooms remaining available.

Snow Clearing – Winter workings, which comprises of salting and snow clearing, are essential to ensuring a safe environment on our network. ScotRail has taken the requirement for winter workings into consideration when creating our staffing proposals to ensure these duties remain covered.

Car Park token scheme – ScotRail has identified three stations where the carpark token scheme will be impacted due to the proposed changes. ScotRail will deliver a process at these stations and will identify mitigations to ensure customers are not negatively impacted by the changes.

Ticket office closures

Whilst Transport Focus has concluded that the proposed station closures do not meet the criteria to remain open, Transport Focus recommend ScotRail reconsider the decision on closing the ticket offices and examining the wider impact of closure with potential local development opportunities.

ScotRail will pause the closure of Cartsdyke, Clydebank, and Woodhall ticket office for a two-year period to enable a review to take place. This review will ascertain if the new housing and local business stimulus proposed by the local authorities will increase ticket office numbers.

Subterranean stations

Concern has been expressed at the proposed reduction in ticket office opening times at subterranean stations, particularly due to the lack of stap free access. Transport Focus recommends that ScotRail should pay particular note to the Diversity Impact Assessment and wider implications for passenger safety and security.

ScotRail has a total of five subterranean (subsurface) stations, two of which we have proposed making changes to ticket office opening hours as part of the review - Anderston and Argyle Street. It is important to note that while the ticket office opening hours at these stations will be amended, ScotRail will continue to staff these stations with two staff members from first to last service (in line with fire regulations). There will be no changes made to the staffing hours at these stations and therefore no negative implication for passenger safety and security. Furthermore, staff will no longer be required to be behind the ticket office window outside of the proposed amended hours, allowing them to focus on other key station duties.

Tourism

Transport Focus advised that consideration should be given to the potential impact of leisure activity as it anticipated that leisure recovery will show the quickest recovery. Scotland envisage growth in tourism with rail travel being promoted as a vital aspect of sustainable tourism.

The ticket office opening hours review conducted by ScotRail was carried out pre-pandemic, before leisure travel was impacted by COVID-19. However, ScotRail wants to encourage growth in rail travel as a vital aspect of sustainable tourism. To support recovery and future growth, ScotRail will strengthen staffing at tourist and leisure travel stations such as Girvan, Inverclyde, Thurso, and Wick.

We understand the tourism is important to economic recovery, therefore ScotRail will reach out to relevant tourist boards to consider potential opportunities to work with ScotRail and make use of our facilitates where possible.

Conclusions

ScotRail will add back in the 33 hours Transport Focus has requested.

ScotRail will pause the closures of Cartsdyke, Clydebank, and Woodhall ticket offices for two years to enable a review to take place to ascertain if the new housing and local business stimulus proposed by the local authority will increase ticket office numbers and report every 6 months.

ScotRail will improve its proposal for stations that serve hospitals by broadly maintaining current staff hours at Dalmuir and Hyndland and will also open Wishaw ticket office on a Sunday giving a seven-day staff presence.

In addition, ScotRail will also:

- Implement Transport Focus feedback and strengthen tourist and leisure travel stations at Girvan, Thurso, Inverclyde, and Wick, deploying staff on-site beyond current operational hours.
- From the 117 stations proposed to change, 51 stations will retain current staffing hours. This means at 51 stations the number of hours staff will be available to support customers at the station will not change, even if they are no longer behind the ticket office window.
- 12 stations will have staff on-site beyond current hours.
- 54 stations will see staff redeployed to create three mobile teams and new high-profile customer support at Glasgow High Street, Paisley, and Partick stations.
- ScotRail will publish an executive summary of Diversity Impact Assessment.

I hope the changes we propose to make as a result of the public consultation demonstrate we are listening to our customers and creating an environment that improves safety, customer support, and the helpfulness of staff.

Best wishes,

Phil Campbell Head of Customer Operations ScotRail

Appendix 1

Stations where staff availability will remain the same despite the change in Schedule 17 Hours							
Airdrie	Dalmeny	Huntly	Partick				
Anderston	Dalmuir	Hyndland	Pitlochry				
Anniesland	Dingwall	Johnstone	Pollokshields East				
Argyle Street	Dunbar	Kilwinning	Polmont				
Aviemore	Dunblane	Kingussie	Shotts				
Ayr	Dunfermline Town	Kyle Of Lochalsh	Stirling				
Bathgate	Edinburgh Gateway	Larbert	Stonehaven				
Bearsden	Elgin	Lockerbie	Stranraer				
Bishopton	Forres	Milngavie	Wemyss Bay				
Burnside	Giffnock	Motherwell	Whitecraigs				
Carluke	Girvan	Muirend	Wick				
Carstairs	Glengarnock	Nairn	Williamwood				
Crosshill	Helensburgh Central	Paisley Gilmour Street					

Appendix 2

Station toilets impacted by ScotRail's Schedule 17 review						
Alexandria	Falkirk High	Linlithgow				
Balloch Central	Gourock	Neilston				
Barrhead	Greenock Central	Port Glasgow				
Cumbernauld	Irvine	Prestwick Town				
Cupar	Keith	Saltcoats				
Dumbarton Central	Kilmarnock	Singer				
East Kilbride	Largs	Troon				
Easterhouse	Lenzie	Wishaw				
Falkirk Grahamston	Leuchars					