

By email

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Dear Phil

Transport Focus notes that ScotRail announced plans (31 October 2024) to implement changes to ticket office opening hours to deliver more visible customer support at stations, reflecting changing travel and ticket purchasing patterns. The implementation of the changes is likely to come into effect in the first half of 2025.

The changes were consulted upon in January 2022 and will take place more than two years after the consultation closed.

Our current understanding is that of the 143 ScotRail staffed ticket offices:

- 12 ticket offices will see opening hours increase, mainly at weekends and staffed hours will increase.
- 54 ticket offices will see a reduction in hours and staff can be moved elsewhere on the network for the remainder of their shift. Staff will still continue to book on/off at their home station.
- 77 staffed stations (23 of which did not form part of the consultation) there will be no change to staffed hours. Whilst there may be a change to ticket office opening hours at many of these stations, staff hours will remain the same and staff will continue to be physically present at the station. This means the station will still be staffed for the same hours as it is today, but instead of being behind the ticket window the member of staff will carry out face-to-face duties on the platform, including assisting any passengers who require it and ensuring the platforms are safe.

During the consultation we were guided in our response by the guidance in place at the time and the regulatory processes in force. This only allowed 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 had no objection to the proposals based on the sales data submitted as part of the consultation. However, we did raise wider issues and concerns that needed to be addressed if the proposals are to go ahead and we would welcome ScotRail's further consideration, prior to implementation of the proposals. These wider issues and concerns were raised by passengers during the initial consultation.

We welcomed ScotRail's constructive response to the recommendations made at the end of the consultation period to amend the initial proposals.

However, as over two years have elapsed since the consultation closed, we have taken the opportunity to review the responses received, to reiterate concerns expressed at the time, regarding ticket office opening times and wider concerns voiced by passengers. We trust that ScotRail will take these points into consideration to inform the implementation plan.

As you will recall we received 1,550 responses during the consultation and all but twenty of the respondents' 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.

Transport Focus recognises that the way many passengers buy their ticket has changed, with increasing numbers choosing to buy online, use apps or Ticket Vending Machines (TVMs). We accept that this has changed the nature of retailing at stations – with stations now only accounting for around 16 per cent of sales on average.

We acknowledge that the proposal is designed to respond to this shift in passenger behaviour, with the aim of bringing staff out from ticket offices to better meet passenger needs. It is important to stress that Transport Focus is not against the principle of 'bringing staff out from behind the glass'. Our concerns are based solely on the specific proposals and the potential impact on passengers.

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 during the consultation illustrated this reality:

“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”

Currently ticket offices provide access to a full list of tickets and services. TVMs do not sell/serve all of these. As a consequence of the changes there is likely to be an increased reliance on TVMs, which currently account for 20 per cent of transactions.

TVMs are not physically accessible to all passengers and some people with cognitive disabilities can have difficulties in using them. If staff assistance to purchase a ticket from a TVM is not available at the station, passengers in particular disabled passengers, will find it harder to purchase a ticket before they board the train. Comments received during the consultation highlighted concerns:

“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”

Questions:

- How will disabled people who cannot use a TVM purchase a ticket?
- How will people summon a member of staff if they need help while using a TVM (i.e. the equivalent of the 'red light' at a supermarket self-checkout till)?
- Is it proposed to upgrade TVMs to offer remote access/video help facilities?
- Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability? This includes whether they are under cover, whether passengers queuing are protected from the weather and whether they can be read in direct sunlight?

We note that every train has two members of staff:

- Will the guard/ticket examiner be able to sell the full range of tickets available, accepting both cash and card payment?
- If not, can you advise what products will be solely available from the ticket office at their revised opening times?

Issues relating to whether passengers can continue to use facilities at a station

At 54 stations that will see a reduction in ticket office opening times, there will be also a reduction in station opening hours.

For example, Hamilton West ticket office is currently open from 06:20 – 20:04 on a weekday. Under the proposals the ticket office will be open from 06:20 – 14:00 on a weekday. Therefore, there will be no staff presence from 14:00 onwards.

At the 54 stations that will see a reduction in ticket office opening times, the original consultation suggested that:

“ScotRail wishes to repurpose the staff who work in stations at times when it is no longer busy and use them to move around the network as a visible presence at stations and on trains during times when customers need it most. This includes: – Customer assistance and additional ticket selling/checking at our busiest locations during busy periods to alleviate queues.”.

There is, however, no detail on how many staff will be ‘mobile’, what will be the hours of duty and how stations affected will be covered on a mobile basis.

Providing a visible presence when customers need it most, at busy stations during busy periods to alleviate queues and assist revenue protection is welcome but suggests it will be targeted at peak travel times.

From the information provided it’s unclear whether access to vital station facilities including lifts, waiting rooms and toilets will also be reduced at stations where staffing hours have also been reduced.

Without knowing any detail on how mobile teams shall operate it’s difficult to understand what passengers can expect in terms of providing a more visible support at stations and hope you can provide clarification on the following issues raised by passengers.

Questions:

- Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn? What are these? How robust will they be?
- And if so when will any proposed mitigations be implemented?
- And if facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?
- We understand that alarms for ‘disabled’ toilets are often located in ticket offices. Is this the case and, if so, where will these be fitted?

Accessibility

It is clear that proposals will result in many stations no longer having staff for significant periods of the day/week during which there is currently ticket office staff present. At stations where overall staff presence has been reduced disabled passengers' ability to 'turn up and go' will be impacted. While in many cases staff onboard the train may be able to assist passengers on and off the train, they are unlikely to be able to fully assist with journey planning, ticket purchase or getting to and from the platform.

While 'mobile' staff may be able to offer this service at some stations, even if this could be delivered robustly, it appears to inevitably mean passengers having to pre-book or wait for the staff to arrive.

We know through our research that passengers value staff at stations highly. This is not just related to selling tickets but also in relation to safety and security, providing information and providing assistance and support. Comments received during the consultation illustrated this point:

"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"

Questions:

- Have you conducted a risk assessment to consider any potential impact regarding the reliability of passenger assistance delivery given the changes?
- Will ScotRail's Accessible Travel Policy be updated and reviewed by Office of Rail and Road?
- When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?
- If this is reliant on onboard staff how will passengers be assisted to move around the station to the platform/to purchase the correct ticket/get advice/journey plan?
- How will passengers alert the guard if they haven't pre-booked assistance?
- If the mitigation is a mobile team how long will people have to wait?
- If the mitigation is to provide an accessible taxi what processes will be put in place and what is your assessment of the adequacy of this compared with travel by train? i.e. how easy is it to source accessible taxis and how reliable are they.

- What monitoring regimes will be put in place to measure time taken and reliability?
- How will people summon help if staff are not there?

Currently passengers know to approach the ticket office – it is the focal point. We understand that guide dogs are trained to go to the ticket window, and it is also the case that ticket windows have induction loops to help people hear. Passengers need to know where they should go to reliably find staff or be able to notify staff that they need assistance.

Questions:

- How will the focal point of the ticket office/window be replicated?
- How will people summon help if staff are not there?
- Will induction loop facilities be provided elsewhere on the station/concourse?
- What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?

We note that an Equality Impact Assessment has yet to be published that takes account of the proposed changes. This requires to be addressed prior to the changes taking effect.

Issues relating to whether passengers feel safe at the station

Where proposals reduce staff presence at stations this risks making passengers feel less safe. Removal of staff presence in the evenings, as is the case in a number of proposals, seems particularly likely to result in increased concern about personal safety as mentioned during the consultation:

“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” “

“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”

Many women speak of feeling safe in well-staffed areas/stations, and of feeling less safe in unstaffed areas¹. Transport Focus research noted that one of the key areas of concern for passengers was the lack of visible staff across the rail network².

¹ Women's and girls' views and experiences of personal safety when using public transport – Transport Scotland 2023

² Passenger perceptions of personal security on the railways – Transport Focus 2016

Questions:

- Have you liaised with the British Transport Police about the impact on staff and passenger security?
- Are any mitigations planned?
- Is CCTV coverage adequate, is it accessible 'live' from centres and is there resource to monitor it remotely when required?
- Are there any improvements planned to the functionality of help points and promoting their availability?

Conclusion

We would welcome further clarification on these points. We recognise that there are a lot of questions and the issues raised are complicated, so we would be happy to meet to discuss these in more detail.

For ease of reference 'Annex A' contains the questions raised in the body of the letter, that we would welcome an answer to. We would welcome a response early in the New Year.

As this process began with a public consultation, for absolute clarity – and to help ensure transparency – we also want to inform you that we intend to publish this letter and your formal response alongside. Please be aware of this when responding.

Yours sincerely

Robert Samson

Robert Samson
Senior Engagement Manager

Encs: Annex A

Copy: Joanne Maguire, Managing Director
David Ross, Communications Director

Annex A

1. How will disabled people who cannot use a TVM purchase a ticket?
2. How will people summon a member of staff if they need help while using a TVM (i.e. the equivalent of the 'red light' at a supermarket self-checkout till)?
3. Is it proposed to upgrade TVMs to offer remote access/video help facilities?
4. Have you assessed the accessibility of existing TVMs, both in terms of their location at the station and useability? This includes whether they are under cover, whether passengers queuing are protected from the weather and whether they can be read in direct sunlight?
5. Will the guard/ticket examiner be able to sell the full range of tickets available, accepting both cash and card payment?
6. If not, can you advise what products will be solely available from the ticket office at their revised opening times?
7. Are there any proposed mitigations designed to keep facilities open even when staff have been withdrawn? What are these? How robust will they be?
8. And if so when will any proposed mitigations be implemented?
9. And if facilities are to be open when staff have been withdrawn, how will it be ensured that they are not subject to misuse or vandalism and will be maintained in good condition?
10. We understand that alarms for 'disabled' toilets are often located in ticket offices. Is this the case and, if so, where will these be fitted?
11. Have you conducted a risk assessment to consider any potential impact regarding the reliability of passenger assistance delivery given the changes?
12. Will ScotRail's Accessible Travel Policy be updated and reviewed by Office of Rail and Road?
13. When station staffing hours are reduced how will turn up and go assistance for disabled passengers be maintained?
14. If this is reliant on onboard staff how will passengers be assisted to move around the station to the platform/to purchase the correct ticket/get advice/journey plan?
15. How will passengers alert the guard if they haven't pre-booked assistance?
16. If the mitigation is a mobile team how long will people have to wait?
17. If the mitigation is to provide an accessible taxi what processes will be put in place and what is your assessment of the adequacy of this compared with travel by train? i.e. how easy is it to source accessible taxis and how reliable are they.
18. What monitoring regimes will be put in place to measure time taken and reliability?
19. How will people summon help if staff are not there?
20. How will the focal point of the ticket office/window be replicated?
21. How will people summon help if staff are not there?
22. Will induction loop facilities be provided elsewhere on the station/concourse?
23. What mechanisms will exist to monitor instances where assistance is not provided and to investigate why it happened?

24. We note that an Equality Impact Assessment has yet to be published that takes account of the proposed changes. When will this be made available?
25. Have you liaised with the British Transport Police about the impact on staff and passenger security?
26. Are any mitigations planned?
27. Is CCTV coverage adequate, is it accessible 'live' from centres and is there resource to monitor it remotely when required?
28. Are there any improvements planned to the functionality of help points and promoting their availability?