



Date: 28 January 2025

By email

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Dear Robert

ScotRail Changes to Ticket Office Opening Hours

I write with reference to our plans to implement changes to ticket office opening hours and specifically in response to the correspondence of 20 December 2024, and your request for further clarification on points raised during the public consultation which took place in January 2022.

ScotRail can confirm that of our 143 staffed stations, 120 formed part of the Schedule 17 review. At the time of publication, a station met the criteria for review if it had instances of fewer than 12 transactions per hour, as laid down in the Ticketing and Settlement Agreement.

Following extensive analysis of ticket office usage and sales data from the 120 staffed stations which formed part of the review, the proposal is that:

- 12 ticket offices will see an increase to opening hours and staff hours, mainly at weekends.
- 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.
- At the remaining 54 staffed stations there will be no change to staffing 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 customers who require it and ensuring the platforms are safe.

For the avoidance of any doubt, the remaining 23 of the total 143 stations did not form part of this review. There will be no changes to ticket office hours at these 23 stations because of higher ticket sales excluding them from review. In other words, the staffing hours and opening hours are unaffected.

ScotRail carried out a comprehensive review of ticket office opening times to assess how we can better align our resources (e.g. staffing) with customer demand and need. The review included

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adopting relevant guidance at the time on changes to ticket office hours as laid down in the Ticketing and Settlement Agreement.

ScotRail reviewed additional factors, to ensure the customer experience was understood and supported. These additional factors helped shape the public consultation and final recommendations:

1. Number of platforms and ticket windows.
2. Number of ticket vending machines and location, number of entrances/exits.
3. Train dispatch/subterranean stations (e.g., Glasgow Central Low Level, Argyle Street), automatic ticket gates, manual revenue barriers, or terminal stations.
4. Customer support at stations, for example, lifts, Help Points, CCTV, seating, shelters, and toilets.
5. Volume and times of passenger assistance.
6. Community, including station retail (station shop, local business, tenant etc.), anti-social behaviour, proximity of station to schools/hospitals/colleges/universities.
7. ScotRail also carried out an Equality Impact Assessment (EqIA).

Following a full review of Schedule 17 ticket office opening hours and an assessment of the impact, ScotRail has made the decision to proceed with its proposal to change ticket office opening hours. The rationale for the decision is that it supports the delivery of:

- The long-term sustainability of Scotland's Railway, through reducing reliance on the taxpayer, by maximising revenue collection by deploying staff at the busiest stations.
- Improve customer experience by ensuring our staff are able to support them where it is needed most.

I note Transport Focus has taken the opportunity to review the responses received from the consultation following ScotRail's announcement to proceed with implementation and would like clarification on how ScotRail has used feedback from the consultation to inform the implementation plan. In particular, Transport Focus would like feedback in the following four areas:

1. Buying a ticket
2. Station Facilities
3. Accessibility
4. Safety at Stations

I understand that this request is largely a result of the period, of over two years, between the consultation ending and the recent announcement to go ahead with implementation of these proposals following agreement from Scottish Rail Holdings and the Scottish Government.

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I note that Transport Focus welcomed ScotRail's constructive response to the recommendations made at the end of the consultation period, to amend the initial proposals based on feedback from the consultation.

As mentioned above ScotRail carried out an EqIA which helped shape our proposals. Following agreement from Scottish Rail Holdings and the Scottish Government, ScotRail carried out a full review of our EqIA. It should be noted that Transport Focus' recommendations from the public consultation were folded into this review and used in our evidence base to identify any potential negative impacts on people with protected characteristics and to identify actions points to mitigate against negative impacts in this regard. For your information, I have attached the EqIA alongside this letter and this will be published online.

Please find our response to the points made below.

Buying a ticket

Of the 120 stations that formed part of the Schedule 17 review, 54 stations will continue to remain staffed as is, despite the reduction of ticket office opening hours, whilst a further 12 stations will see ticket office opening hours, and staffing levels, increase. Of the remaining 54 stations affected, 21 of these stations will see a reduction of hours by one hour or less. The remaining 33 stations may see a more significant change to staffing levels, where the reduction in staff coverage may vary from between one hour and 14 hours, depending on the station. It should be noted that at stations where staffing is not impacted, despite changes to ticket office opening times, staff will still have the ability to sell tickets to customers for the full duration of their shift.

During times when the station is unstaffed, customers will still have the option to buy a ticket from the Ticket Vending Machines (TVMs), or online via the ScotRail App. However, for customers who are unable to use TVMs or the ScotRail app to purchase tickets, the option of purchasing a ticket on board our services from a ScotRail member of staff will always be available. At stations with a ticket barrier passengers can purchase tickets from staff at barriers as all barriered stations are staffed. Whilst ScotRail encourages customers to buy before they board, customers are not penalised for purchasing their ticket on-train, or at the end of their journey, as the cheapest fare will be sold to customers regardless of where in the journey, they purchase their ticket.

Our Conductors and Ticket examiners can sell a wide range of tickets and accept both cash and card payments. ScotRail notes that due to current regulations there are some products that cannot be purchased on-train:

- Advance Single
- Flexipass
- Season pass (monthly and longer)
- Purchase and renewal of Railcards (periodic purchase)

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ScotRail acknowledges that these ticket types cannot be purchased on-train. However recent data shows that the majority of these tickets are currently purchased online or via the ScotRail app, and that the majority of these tickets, when purchased at stations, are currently purchased when ticket offices are busier, particularly in the morning peak when ticket offices will remain open. For example, recent data shows 89 per cent of season tickets sold at stations will still be available to purchase during proposed opening times.

ScotRail considers that a suitable communication strategy to communicate the change in ticket office hours should ensure that people are able to access these tickets in advance from ticket offices, despite the reduced opening hours. Customers may also access these tickets online or by telephone.

There may be a small impact for those who remain unable to purchase tickets online or via telephone, and when ticket offices are closed. ScotRail is content that these residual effects are minor, can be substantially mitigated through the communications strategy/other options for purchasing, and that any residual impacts are proportionate to the aims pursued by these changes.

18 of the 120 stations that formed part of the Schedule 17 review have TVMs located in the booking office or concourse. These stations will remain fully accessible to customers outside of opening times because stations will either remain staffed beyond the ticket office hours, or the station building will remain open and accessible even when staff aren't present.

All other TVMs are located on station platforms so will also remain accessible to customers. ScotRail did note throughout the EqIA that six stations with reduced staffing levels are accessible only via stairwells, meaning TVMs may remain inaccessible to customers with reduced mobility. Whilst the change in staffing levels will not directly alter the physical limitations in the stations that are currently present, to mitigate these pre-existing and structural issues, ScotRail will continue to explore opportunities for installing station lifts with Network Rail. ScotRail did recognise, however, that the changes to staffing levels may negatively impact customers with mobility issues who could otherwise have accessed the station platform (and TVM) with the assistance of staff. To mitigate against any impact in this regard, customers can use our Accessible Travel Policy to assist with travel arrangements. This policy ensures that any persons with reduced mobility who wish to travel from an inaccessible station, will be provided with an appropriate taxi at no extra charge between the inaccessible station and the nearest, and most convenient, accessible station for their journey.

ScotRail's TVMs, manufactured by Scheidt & Bachmann, comply with the most up-to-date UK DDA legislation, in relation to operational component heights, at the time of installation. TVM screens are placed at a height that allows for both standard usage and use by wheelchair users. The angled screen, together with the wide viewing angle of the screens, allows for users at varying heights to easily see the TVM screen (<https://www.scheidt-bachmann.co.uk/en/>). TVMs are used by a large number of customers at present. We do not have note of comments regarding issues with queuing, even when ticket purchasing trends at TVMs have been significantly higher in previous years. Waiting rooms and shelters will continue to be fully accessible to customers despite changes to staffing levels, this is because staff will continue to book on and off at their home station. Staff will

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unlock station facilities at the start of their shift, and will return to the station to lock up at the end of their shift

ScotRail's TVMs do not currently offer remote access/video help facilities. This is something ScotRail previously trialed, however due to a number of issues in providing a reliable service, mostly due to IT bandwidth restrictions, the full roll out of this service did not go ahead. Customers looking for assistance using the TVM machine have the option to phone ScotRail Customer helpline, the number of which is available on the user guide on the TVM machines, or receive advice and assistance via Station Help Points, which are available at all staffed stations. All Help Points are fitted with an induction loop and are staffed 24 hours per day, seven days a week. Our TVM screens have a special foil to allow customers to read our screens in direct sunlight. Our TVMs undergo regular testing, under the service quality regime, and screens will be replaced if usability is reduced for any reason.

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

Ticket office staff at stations where staffing hours may reduce will be moved around the network as required by the local management team to meet business needs. Staff will not be required to travel out with their geographical area, and start and finish times will remain the same, as will their duties. These duties may include carrying out revenue protection at busier stations, assisting customers during events, and ensuring platforms are safe, including reviewing underfoot conditions during periods of bad weather.

The proposals do not involve changes to staffing hours, staff contracts or terms and conditions, or involve a material change in employment. This means that all staff will book on and off at the same time and that staff will continue to book on and off at their home station. This will ensure that the staff member is able to unlock station facilities at the start of their shift, including accessible toilets and waiting rooms, and then return to the station at the end of their shift to lock up. Access to station facilities will therefore be unaffected by the changes in ticket office opening times.

28 of the 120 stations that formed part of the Schedule 17 review have lifts. Sixteen of these stations will see no changes to staffing times. The remaining 12 stations may see a reduction in ticket office opening hours, but the lifts will continue to remain accessible. This is because the remaining 12 lifts can operate out with station staffing times, or the station remains staffed by other station grades, i.e. dispatch staff. Access to station lifts will therefore be unaffected by the changes. ScotRail will continue internal partnerships, working to ensure lifts remain accessible outside ticket office opening hours, for example, being operated remotely, and 24/7 CCTV coverage.

Staff will be on hand at the start and end of the shift to ensure the facilities are cleaned, maintained, and in good condition. When staff are not physically on site, as with other unstaffed stations, facilities are monitored through CCTV or IP cameras. All cameras are directly connected to ScotRail staff at our Customer Service Centres in Paisley and Dunfermline, which are staffed 24 hours per day, seven days a week. Should any stations be subject to misuse or vandalism, this will

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be actioned by our dedicated Travel Safe Team (TST) who focus on tackling anti-social behavior across the network.

ScotRail have identified a number of actions to be taken ahead of implementation. This includes a full review of all the station's facilities to identify minor works required to enable the changes to take place, for example, installing shutters on booking office windows, and alarms in station toilets. ScotRail will not remove staff from any stations until such work is complete, this ensures our stations remain safe and accessible to all.

Accessibility

As with the current process at unstaffed stations, and during times when ticket offices are currently closed, our on-train staff are fully trained to carry out visible leader criteria at each stop, where they assess the platform at every station to check if anyone requires assistance, and to assist accordingly. All on-train staff are fully ramp trained, and all ScotRail trains are equipped with ramps. ScotRail are committed to having a second person on every train – the driver plus either a ticket examiner or conductor. If the conductor or ticket examiner is not available, the train does not run. This ensures 100 per cent coverage across all services operated by ScotRail, and guarantees that on-train staff, who can provide assistance, will always be available to anyone who needs help. Removing staff from a ticket office to carry out front-line duties on the network will not impact passenger assistance arrangements on our services, whether booked in advance or not. If customers wish to do so, they can press the Help Point on arrival at the station and advise the CSC team that they require assistance. Customer Service Centre staff will then contact on-train staff to advise them of the assistance required. Alternatively, customers can wait on the platform for their train to arrive and the on-train member of staff will assess the platform on arrival to identify if anyone requires assistance. We are also rolling out 'Meeting Points' to all stations on our network which will give disabled customers more confidence when travelling that they can identify themselves as requiring support, particularly those with hidden disabilities.

As per the EqIA ScotRail will review and monitor any increase in help point activity at stations where staffing changes will be implemented and will consider mitigating actions if any issues are identified through the CSC. Customer complaints in relation to passenger assistance will also be closely reviewed to identify any increase, and this will be actioned accordingly.

For stations that are inaccessible to customers due to pre-existing structural issues, customers can use the Accessible Travel Policy to assist with travel arrangements. This policy ensures that any person with reduced mobility, who wishes to travel from an inaccessible station, will be provided with an appropriate taxi at no extra charge between the inaccessible station and the nearest, and most convenient, accessible station for their journey. ScotRail has a contract in place with CMAC, a road transport provider, covering the whole of the United Kingdom. In the event that a customer requires alternative transport, CMAC is tasked with sourcing an appropriate vehicle. Customer details will be taken to allow us to ascertain if the customer can travel in a standard vehicle or needs an accessible vehicle. ScotRail will also take a mobile contact number, if available, so that the

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passengers receive a text from the taxi supplier -this message will provide details of the make, model, an estimated arrival time, and live tracking details of the vehicle. This will also be monitored by the CSC staff. ScotRail continually assesses accessible vehicle availability by location with CMAC, bookings are monitored, and any issues with timings or reliability are reported to CMAC's customer relations team. This is a standing item at the CMAC four-weekly contract review meeting and helpst to ensure the best service is provided to our customers.

Customers will still be able to receive advice and help via station Help Points, which are available at all staffed stations, are fitted with an induction loop, and are directly connected to ScotRail staff in our Customer Service Centres in Paisley and Dunfermline. Our customer Help Points are well sign-posted to serve as a focal point for anyone requiring help when in the station. The CSCs are staffed 24 hours per day, seven days a week, and the staff can see, via CCTV, and speak to customers remotely via the Help Point, and give information and advice. Alternatively, if customers need help purchasing a ticket out with ticket office opening times, they can do so on board our services.

As a result of changes to ticket office opening hours, ScotRail's Assisted Travel Policy (ATP) will be updated to reflect any changes. ScotRail have met with the Office of Rail and Road (ORR) who are aware that a full review of the ATP will be undertaken by ScotRail and submitted to the ORR once the staff consultation comes to an end.

Issues relating to whether passengers feel safe at the station

The safety and security of our customers and staff remains ScotRail's number one priority and has always been a consideration when shaping our proposals. Our EqlA carefully considers the impact our changes may have on the safety and perceived safety of our customers travelling on the network.

In previous correspondence, ScotRail outlined the steps it had taken to improve safety across the network, including the introduction of the Travel Safe Team (TST). Since this time, ScotRail has committed to Investing £1.6 million to improve safety on the Scotland's rail network. Recent measures include the roll out of 1,000 new body cameras for frontline staff, the expansion of the TST from nine to 37, double staffing of some late-night services to better support customers, and the introduction of 42 Revenue Protection Officers. In addition, more than 140 frontline roles, that were vacant at the end of the previous franchise, have been recruited at stations and on-train to better support customers. This will assist in tackling anti-social behaviour on our network, with a particular focus on vulnerable people, and people with protected characteristics which have been identified as being more at risk. The introduction of the TST has proven that a targeted response has a positive impact on reducing anti-social behaviour across the network. ScotRail will engage in a comprehensive communications exercise to ensure staff and passengers are supported to report and respond to issues of anti-social behavior. British Transport Police, and ScotRail's safeguarding manager, have been informed of the proposed changes relating to ticket office opening times. As stated in our EqlA, ScotRail will monitor and review any changes to instances of anti-social behaviour and passenger assaults as a result of staffing changes, and action if and as required.

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All of ScotRail's affected stations have dedicated CCTV or IP, cameras providing wide range coverage at each station, and customer Help Points, which will still be functional regardless of staffing changes at stations. All cameras and Help Points are directly connected to ScotRail staff in our Customer Service Centres in Paisley and Dunfermline, both of which are staffed 24 hours per day, seven days a week. The staff can see and speak to customers remotely via the Help Point and can provide information and advice at any time. ScotRail are currently working on a video campaign to promote our help points and this will be completed by early April. Furthermore, any new help points installed across our stations will have improved functionality and can be operated hands free.

Conclusions

ScotRail recognises, and has thoroughly considered, the feedback from Transport Focus following public consultation. However, ScotRail is satisfied that the action points identified will mitigate the change and provide a better service for customers. Following agreement from Scottish Rail Holdings and the Scottish Government, the decision has been taken to proceed with the reduction in ticket office opening hours but maintain all current staff hours.

The basis for this decision relates not only to the significant change in customer purchasing habits since the last formal review of ticket office staffing in 1991, but ScotRail believes that these changes will deliver a more sustainable railway by delivering the following:

- Improved customer service, and the visibility of frontline staff, through ensuring our staff are where our customers need them most.
- A safer environment for the greatest number of customers and staff, by increasing visible staff presence across our network.
- Improved revenue protection by having frontline staff visible where customer demand is highest, delivering better value for money for the taxpayer.

Yours Sincerely



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