



ScotRail Ticket Office Consultation – CILT response

January 2022

1. The Chartered Institute of Logistics and Transport (CILT) is a professional institution embracing all transport modes whose members are engaged in the provision of transport services for both passengers and freight, the management of logistics and the supply chain, transport planning, government and administration. Our principal concern is that transport policies and procedures should be effective and efficient, based on objective analysis of the issues and practical experience, and that good practice should be widely disseminated and adopted.
2. The Institute has a number of specialist forums, a nationwide structure of locally based groups and a Public Policies Committee which considers the broad canvass of transport policy. CILT is pleased to respond to this consultation, which has been considered by its Accessibility and Inclusion Forum in partnership with CILT Scotland and the Strategic Rail Policy Group.
3. CILT recognises the changing patterns of rail ticket retailing as set out in the consultation, and acknowledges that the current deployment of staff may not be optimal in terms of customer, commercial or external benefit. We also understand the significant financial pressure the industry faces, resulting from the dramatic fall in rail network use since the start of the Covid pandemic. Quite simply, the rail industry cannot afford to deploy staff in an inefficient manner, in roles where their usefulness is minimal.
4. As such we think it entirely reasonable to examine the demand for face-to-face ticket sales, and how changes may need to be made to staff roles and deployment – we support the implication in the consultation that what was appropriate in 1991 may no longer be so in 2022. CILT is grateful for the opportunity to comment on ScotRail's proposed changes.
5. We recognise that for many passengers, the availability of alternative sales channels is welcomed and they use these with ease. It would be helpful to understand why those passengers who still use ticket offices do so, and what will be the impact on their propensity to use rail or, in effect, forcing them to use other channels. The consultation does not shed much light on this, and as such we would be concerned that, at a time

ScotRail cannot afford to lose any more customers, it may be acting without a proper understanding of the consequences.

6. More concerning is that this consultation fails to acknowledge, explain, or quantify, the other impacts resulting from ticket office closure – beyond just access to face-to-face ticket sales. The majority of ScotRail ticket offices are assumed to be at single-staffed stations, where the withdrawal of scheduled staff presence may also result in the closure of heated waiting rooms and toilet facilities. The ‘flexible’ deployment of staff would not appear to support the scheduled availability of essential station facilities. Where in this consultation is an analysis of the scale and consequences of these very obvious impacts?
7. Other impacts may be less obvious, but also act as a deterrent to travel. For example: the provision of ‘turn up and go’ station navigation assistance to older and disabled people; the provision of auxiliary aids (e.g. customer wheelchairs); the reassurance provided by staff presence; disruption and incident management; etc. These impacts would appear to be a direct result of changes to ticket office opening times – where other station staff are not available, and yet they are not mentioned in the consultation.

There are good reasons for ScotRail to set out clearly these direct impacts.

8. In the first place, the rail network has lost perhaps half its customers in the last two years, and there is an urgent need to attract new business – in an environment where there is plenty of spare capacity. Closing heated waiting rooms and toilets, and adversely impacting on e.g. perceptions of personal security, are not going to help the railway solve its financial problems, especially in an ageing society, and where the decimation of the ‘captive’ commuter market means demand is far more elastic in 2022 than in 1991 or indeed at any time in the recent past. Reducing the attractiveness of stations is also not going to help deliver the necessary external benefits of rail use, including for example modal shift away from car use, which is an essential component of mitigating the impacts of climate change.
9. Secondly, ScotRail/ Transport Scotland are subject to the Public Sector Equality Duty (PSED), and as such are legally required to ‘advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it’. These proposed changes would seem to have the potential to impact significantly on older and disabled people – if there is to be reduced access at stations to a warm and staffed environment, and access to toilet facilities. There may also be disproportionate impacts on other groups, e.g. pregnant women. As such, the consultation should set out the equality impacts – demonstrating not just the maintenance of equality of opportunity as it currently stands, but how this is to be ‘advanced’ under the new arrangements. A failure to give ‘due regard’ to this under the PSED, and/or a failure under Part 3 of the Equality Act 2010 to make reasonable adjustments to policies and practices etc. to prevent substantial disadvantage to disabled people, could lead to legal action being taken against ScotRail/ Transport Scotland, and/or the need to make late changes to staff deployment

which result in unnecessary cost. Experience from previous industry staffing changes shows that a failure to consider adequately the accessibility impacts, can undermine an operator's negotiating position with trade unions, at what will undoubtedly be an unnerving time for staff.

10. Furthermore, there is no evidence that ScotRail has complied with the 'Contents of the notice' requirements as set out in its Ticketing and Settlement Agreement. This states:

"3 a) A notice which is served pursuant to sub-Clause (2)(a) above must state the reasons why the Operator wishing to make the relevant change believes the change would satisfy either of the criteria referred to in sub-Clause (1) above, taking into account... (vii) the adequacy of the proposed alternatives in relation to the needs of passengers who are disabled". See: <https://www.raildeliverygroup.com/media-centre-docman/services/rsp/12119-tsa-v10-2-main-agreement-volume-1/file.html>

11. CILT believes as a minimum such consideration of the 'adequacy of the proposed alternatives' should include the station-specific impacts (if any) on disabled people arising from changes to:

- access to enclosed and heated waiting facilities;
- step-free routes (e.g. where step-free walking routes and/or lifts are unavailable when stations are unstaffed, or where walking routes are lengthened e.g. due to building closure)
- access to toilet facilities, including accessible toilets;
- scheduled staff presence at the station, at times trains are running;
- availability of station navigation assistance, on a booked and unbooked basis;
- availability of boarding/ alighting assistance, on a booked and unbooked basis;
- availability of auxiliary aids, as defined by the Equality Act 2010 (Section 20)

12. For example, we note at Dingwall station that the ticket office, currently open from 0730-1434 (Monday-Friday) will in future only be open from 1045-1245 (Monday-Thursday)/ 1015-1200 (Friday), a reduction of around 5 hours daily. The consultation should explain whether the opening times of the heated waiting area and accessible toilet at this single-staffed station will similarly be reduced, and what the expected consequences of these and other impacts are on disabled people. Looking beyond the Ticketing and Settlement Agreement, the PSED would seem to require that the station-specific impacts applicable to all groups with protected characteristics need to be considered – and how these will advance equality of opportunity when compared to the current situation.



Fig. 1: heated waiting facilities at Dingwall station (source National Rail Enquiries)

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