

Fiona Hyslop MSP  
Cabinet Secretary for Transport  
The Scottish Parliament  
Edinburgh  
EH99 1SP

By email to: [cabsecfortransport@gov.scot](mailto:cabsecfortransport@gov.scot)

03.03.25

Dear Fiona,

### **Proposed reduction in ScotRail ticket office hours**

We are writing to express our concerns about the planned reductions in ticket office opening hours at nearly 100 of ScotRail's 143 staffed stations and to urge you to instruct ScotRail to scrap these plans which will worsen passenger accessibility, service, safety and security. We understand that ScotRail recently announced that it intends to implement these reductions from 31<sup>st</sup> March 2025.

We are aware that these planned reductions in hours are being taken forward by ScotRail on the basis of a public consultation by former operator Abellio in January 2022, despite the plans being opposed by 98% respondents.

Furthermore, since the 2022 consultation, the process via which passenger watchdog Transport Focus responds to operator proposals has changed significantly and it is now required to take a wide range of criteria into account, such as the impact on access to rail products, safety, accessibility and access to facilities into its decision making. If ScotRail were to hold a new public consultation, it would be under this new process.

We are very concerned that the Scottish Government has authorised ScotRail to proceed with these plans without requiring it, at the very least, to hold a new public consultation under the current guidance to allow passengers to share their concerns and for these to be taken into account in the decision making. We do not believe that the current plans being taken forward reflect in any way ScotRail acting in line with passengers' feedback and concerns and believe there is an attempt to evade public

scrutiny over this matter.

### **Impact on station staffing**

As you will be aware, via Schedule 17 of the Ticketing and Settlement Agreement (TSA) ticket office staffing is the only regulated station staffing and crucially reducing ticket office hours removes the **guarantee** that staff will be present at a station.

At 31 of the affected stations, ScotRail has admitted that staffing will reduce as staff are moved to other locations on the network. Whilst it says that staffing hours will not change at the other stations, there would no longer be any **guarantee** for passengers that staff will be present, and this represents a clear worsening compared to current arrangements. In short, ScotRail's word is by no means as strong as regulation via schedule 17.

As Transport Focus highlights, the presence of ticket office staff is key to the quality of service experienced by passengers. Already around 60% of ScotRail's managed stations are unstaffed, and removing this guarantee of staffing for around a third of the weekly hours across the affected stations will represent a significant worsening in quality of service compared to the current arrangements.

### **Accessibility**

We believe that the proposals will lead to a significant worsening of the accessibility of the ScotRail network for disabled and older people. Already disabled people face numerous barriers in accessing the railway and on average, make a third of the number of trips by rail that non-disabled people do.

At many stations, ticket office staff are the only staff present, and passengers requiring assistance will only travel at times when they know there is a staffed ticket office open. We reject ScotRail's suggestion that their proposals represent an improvement for passengers because they increase staff 'visibility'. Instead, ticket offices provide a fixed location for passengers to locate staff, and therefore high-quality advice and assistance. This is particularly important for many disabled people who would not be able to search a station for a roving member of staff, who may or may not be present at the station.

Guide dog users report that their guide dogs are trained to learn the route to the ticket office and ticket offices are generally fitted with hearing loops. A wide range of disability organisations including Guide Dogs, RNIB

Scotland, RNIB, National Federation of the Blind UK and disabled people's organisation Transport for All objected to the DfT's plans to close ticket offices in 2023 on the basis that it would worsen accessibility for disabled people. A poll conducted by Disability Equality Scotland of its members during the 2022 ScotRail public consultation found that a massive 95% were opposed to the plans.

There is the real risk that if these cuts go ahead, many disabled people would face further barriers accessing the railway, which we believe is discriminatory and unacceptable. Since entering Scottish Government ownership ScotRail is subject to the Public Sector Equality Duty (PSED), which requires it to, amongst other things, advance equal opportunities including by meeting the needs of people with protected characteristics and remove or reduce the disadvantages faced by people with protected characteristics. We believe the changes would **increase** barriers for disabled people and make it harder for ScotRail to meet its legal duties in terms of assistance, including Turn up and Go, and are therefore at odds with the PSED.

ScotRail has cited station help points as a proposed mitigation. Yet help points are by no means an adequate replacement for a staffed ticket office. As disabled peoples' organisation Transport for All (TfA) has stated, help points are not always accessible, including for some blind and deaf people, and ORR mystery shopping research has shown help points to have a 50% fail rate in delivering assistance. TfA also state that requiring passengers to use help points to contact mobile staff (which is what is proposed by ScotRail for at least 31 of the affected ticket offices) 'is totally unacceptable and completely removes the ability to Turn Up and Go'<sup>1</sup>. Disabled people and those requiring assistance are only able to guarantee that staff will be present at stations when the ticket office is open.

### **Safety and security**

Staffed ticket offices act as a point of safety for both passengers and staff and the presence of ticket offices and staff has been well evidenced to support passengers' perceptions around safety when travelling. For instance, the Scottish Government's own research into women and girls' safety found that they felt safer travelling when there were staffed ticket offices open. A recent report by Engender looked at the need for an equitable public transport system for preventing violence against women and girls highlighted the importance of staffing for women's personal

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<sup>1</sup> <https://docs.google.com/document/d/1BAXyWPHijGhvjEtWapYswgwrrZGr88z9kI8XZ86c05g/edit?tab=t.0>

security on public transport and stated that ‘reduced staffing levels also disproportionately impact disabled women’s personal and physical safety, who already face higher rates of sexual assault on public transport than non-disabled women’<sup>2</sup>.

### **Access to rail products**

The ticket office is the only way for passengers to ensure they get the most appropriate and best value fare for their journey. The experienced and knowledgeable ticket office staff navigate the confusing and complex ticketing system to ensure passengers get the ticket they require. There are a range of products and services available at ticket offices which are not available at Ticket Vending Machines including refunds, seat reservations, ferry/bus connections and many more. Crucially the disabled persons non-railcard concession is not available online or from TVMs, likewise, neither is the Strathclyde region National Concessionary Card discount.

TVMs are not accessible for many disabled people, and a significant number of people do not have access to smartphones or the internet for online ticketing. Recent research by Audit Scotland found that one in six adults in Scotland lack the digital skills necessary for everyday life and 9% of households do not have an internet connection. Digital exclusion disproportionately affects people already facing disadvantage including those in poverty, and older and disabled people.<sup>3</sup> Concerns around access to the full range of rail products and fares was highlighted by Transport Focus in its response to ScotRail’s 2022 consultation.

As you will be aware, under the Ticketing and Settlement Agreement (TSA), reductions in ticket office hours can only be made if they represent an **improvement** on current arrangements. We firmly believe that what is planned by ScotRail represents a significant worsening on current arrangements, particularly for certain groups including disabled and older people and women and girls and therefore should not be permitted to go ahead.

We believe it is disappointing that despite the vital role that Scotland’s railway has play in delivering modal shift to sustainable travel, the Scottish Government seems intent on pursuing policies that risk pushing passengers away from railway.

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<sup>2</sup> <https://www.engender.org.uk/content/publications/Transport-Briefing-Final.pdf>

<sup>3</sup> <https://audit.scot/publications/tackling-digital-exclusion>

In light of our very serious concerns, we call on you to instruct ScotRail to permanently scrap its plans to reduce ticket office opening hours and commit to retaining and adhering to its existing ticket office opening hours and staffing.

Yours Sincerely,

Mick Lynch, General Secretary – RMT

Dave Moxham, Deputy General Secretary – STUC

James Adams, Director - RNIB Scotland

Emma Vogelmann, Head of Campaigns, Policy, and Public Affairs –  
Transport for All

Stephen Brookes MBE, Transport Policy Adviser – Disability Rights UK

Kim Dams and Jim Elder-Woodward, Co-Convenors – Inclusion Scotland

Caroline Rance, Head of Campaigns – Friends of the Earth Scotland

Lyn Pornaro, CEO – Disability Equality Scotland

Cat Murphy, Executive Director – Engender

Paula Peters – Disabled People Against Cuts (DPAC)