

Diversity Impact Assessment (DIA)

# Project: Schedule 17 Review for Reduction in Ticket Office Opening Hours

Document No.	DIA - 001
Document Version	V1
Directorate/Team	Customer Operations
Issue Date	Draft Issue (not for wider circulation)

## Document History

Version No.	Date	Reason for Issue
V1	29/09/2021	Initial assessment
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## Document Governance

	Name and position	Signed	Date
<b>SRO</b>	[REDACTED]	Click or tap here to enter text.	Click or tap to enter a date.
<b>DIA Author</b>	[REDACTED]	Click or tap here to enter text.	Click or tap to enter a date.
<b>A&amp;I SME</b>	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.
<b>Exec Director</b>	Click or tap here to enter text.	Click or tap here to enter text.	Click or tap to enter a date.

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# Step 1: Clarifying Aims

## Q1. What are the aims of this project/piece of work?

To conduct a comprehensive review of ticket office opening times with the aim to realign resources with customer demand. The review will adopt relevant guidance on changes to ticket office hours: (<https://www.gov.uk/government/publications/changes-to-railway-ticket-office-opening-hours>).

The proposed changes could result in the reduction in ticket office opening hours of up to 117 ticket offices at stations that are deemed to be “not busy” (as per DfT guidance) across certain time of the day.

Staff at these stations will be realigned into more productive roles and will be moved 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 retailing at our busiest locations during peak periods to alleviate queues
- Collaboration with British Transport Police colleagues in managing antisocial behaviour and fare evasion
- Assisting our revenue protection teams at barriers and on trains across the network
- Engaging in wider community initiatives such as adopt a station, school safety initiatives and climate change / CO2 reduction

## Q2. Could this work impact on people?

No (Please go to Q3)

Yes

If yes, briefly explain how this work could affect people (considering your duty to promote equality, tackle discrimination and foster good relations between groups)

### Customers

Our customers are representative of society as a whole and will include many people with protected characteristics as described in the Equalities Act 2010. The public service which ScotRail provides is a vital component of Scotland's economy, linking towns and cities across the country, and transporting our customers quickly and efficiently. The provision of "service" is underpinned by many policies and procedures to ensure that regardless of who our customers are, that ScotRail does not discriminate against customers in the design, development and day to day running of the operation.

The Schedule 17 proposals for ticket office closures will have to consider very carefully the potential implications of these changes on all our customers as it will impact on the operation of:

- Passenger assistance
- Purchasing tickets (reduced rate tickets/concessions)
- Station facilities

### Staff

We understand that Station closures could potentially impact staff with protected characteristics. Until we get to consultation phase, we will be unable to identify if staff are impacted by station closures, as staff are not required to disclose any protected characteristics to their employer. We will therefore ensure that staff are given the opportunity to feedback concerns during consultation and collective bargaining, in line with the Equality act of 2010. All feedback will be analysed and will form part of our informed decision making.

### Q3. Decide if a DIA is required

After completing questions Q1 and Q2, decide if you need to complete the rest of this DIA.

If there are no impacts on people (employees, contractors, lineside neighbours, or passengers) the remainder of the DIA is not required.

Decision	Author	Superuser	Date
	Name, position, and signature e.g., James Smithson, project assistant	Name, position, and signature e.g., Sally Richardson, Super user (Projects Sponsor)	

**No, DIA not required (End here)**  
N.B. Retain in Project file

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**Yes, DIA required**  
Proceed to Step 2: The Evidence Base

[Redacted]

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# Evidence and impact

## Q4. Record the data you have gathered about the diversity of the people potentially impacted by this work

Add more rows if required

Data source	Location	Date accessed
Passenger-assist bookings	Click or tap here to enter text.	Click or tap here to enter text.
Concession purchases	Click or tap here to enter text.	Click or tap here to enter text.
Railcard purchases		
ScotRail customer complaint data		
Scottish Census data		
Scotrail ASB incident reports		
Station Accessibility Information		

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## Evidence and Impact

Opening hours for ticket offices have by and large remained unchanged in over 30 years in Scotland with all key information captured in Schedule 17 of the Ticket and Settling Agreement which applies to all train operating companies (TOCs) within the United Kingdom. Changes to these hours must follow a prescribed procedure which requires extensive analysis of ticket office usage and sales data.

A comprehensive review of ticket offices has been conducted using the relevant guidance on changes to ticket office operating hours (<https://www.gov.uk/government/publications/changes-to-railway-ticket-office-opening-hours>). Based on ticket issuing data, ScotRail has proposed amending the ticket office opening times of 117 stations across the network. It should be noted that ScotRail's proposals will not result in job losses, rather staff will be repurposed and moved around the network as a visible presence at stations and on trains.

In line with our Inclusion for All Strategy, to improve diversity and inclusion across ScotRail for our people, our passengers, and the communities we serve, ScotRail felt it was imperative to go above and beyond the current relevant guidance and carry out an extensive review, to ensure any proposed change does not negatively impact on customers, particularly those with protected characteristics.

ScotRail has reviewed a wide array of data (appendix 1), all of which has helped inform our decision-making process. In addition, ScotRail has taken into consideration, all comments and recommendations provided by Transport Focus (appendix 2) as part of the Consultation process.

As part of the review, ScotRail considered the following areas where proposed changes could have an impact:

1. Station accessibility
2. Passenger assistance
3. Station facilities
4. Ticket purchasing
5. Demographics
6. Access to Schools and Hospitals
7. Anti-Social Behaviour

### 1. Station Accessibility

Of the 117 stations where ScotRail propose changes to Ticket Office Opening hours, 15 stations do not have step free access. However, of the 15 stations that are inaccessible due to stairs, nine stations will continue to be staffed at the same times they are currently staffed. Note that the proposed ticket office opening times will not remain the same, however the station will remain staffed out with the proposed timings.

ScotRail has proposed reducing the staffing hours at a total of six stations that do not currently have step free access to the platforms. The stations that could be impacted are:

- Bridgeton
- Croftfoot
- Garscadden
- Kings Park
- Queens Park

- Springburn

Due to the current lack of station access, the level of booked passenger assistance at these stations is already extremely low. Five out of the six stations had no booked assists in 2019, and Kings Park had only one booked assist (appendix 1). Given the current low usage of these stations by persons with reduced mobility, it is likely that reducing the staffing hours at these stations will have little impact on people with reduced mobility.

It should also be noted that as part of ScotRail's accessibility policy (ScotRail.co.uk), any persons 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.

On reviewing TF's response (appendix 2) to the ticket office consultation, there are no recommendations or comments in relation to stations that have no step free access.

## 2. 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.

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 Schedule 17 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. ScotRail is not committing to having current staffing at all these locations but will extend our proposed opening times to cover off times when customer assistance is required.

It should also be noted that ScotRail will continue to staff a further 49 stations (listed in appendix 3), beyond the schedule 17 hours. This will deliver more flexibility, enabling staff to 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.

On reviewing TF's response (appendix 2), concerns were raised by respondents that redeploying staff from stations during quieter periods would impact people ability to receive assistance when boarding and alighting services. 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.

### 3. Station Facilities

ScotRail carried out an extensive review of station facilities as part of the schedule 17, review of ticket office opening hours. Details of this can be found in appendix 1.

The following station facilities were reviewed:

- **Station Help Points**
- **Customer Information Screens**
- **Public Address Systems**
- **Accessible Toilets**
- **Station Lifts**
- **Accessibility of Ticket Vending Machines**

Station help points, Customer information screens and public address systems are available at all 117 stations impacted by partial closures, and access to these facilities will not be impacted by the Schedule 17 review.

#### **Accessible Toilets:**

Of the 117 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 4).

Based on responses from ScotRail's schedule 17 consultation, TF has raised concern about accessibility in relation to station toilets. ScotRail will therefore 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 reviewing our own data.

#### **Accessible Lifts:**

Of the 117 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. ScotRail 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.

#### **Accessibility of Ticket Vending Machines:**

TF also recommend that all TVM's should be in an accessible location, providing the ability to purchase tickets from first to last service. All Stations under review, that have Ticket Vending Machines, have at least one accessible machine. 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 with the help of remote locking.

#### 4. Ticket Purchasing

As part of the Schedule 17 review, ScotRail carried out a review of ticket purchasing options to consider how any persons with protected characteristics may be impacted when purchasing products as a result of the proposed changes to ticket office opening hours.

ScotRail acknowledges that whilst TVM's offer a wide range of products, some products cannot be purchased via TVM's due to current regulations, or them requiring photo identification. These products include:

- Concession cards
- Railcards

Across the Scottish rail network, some local authorities or councils offer concessionary travel schemes to residents who are elderly or disabled (ScotRail.co.uk). ScotRail carried out a review of concessionary ticket sales data between October 2019 – December 2019 (pre-pandemic) and looked at the impact the proposed timings would have on ticket sales. By applying the proposed ticket office opening hours to 2019 concessionary ticket sales, ScotRail identified that approximately 91% of concession tickets will still be available to purchase during proposed opening times. This does not consider stations where staffing times will exceed schedule 17 hours, therefore the actual number will be higher. It should be noted that concession tickets can also be purchase on-train by a member of staff.

For the purposes of the DIA, ScotRail also reviewed data of 16-25 railcards, and senior railcards, from the same time period, October 2019 – December 2019. These railcards provide discounted travel to passengers between 16-25 or studying full time and to passengers over the age of 60. By applying the proposed ticket office opening hours to 2019 railcard ticket sales, ScotRail calculated that approximately 97% of 16-25 railcard and 87% of senior railcards will still be available to purchase during proposed opening times. This does not take into account stations where staffing times will exceed schedule 17 hours, therefore the actual number will be higher. It should be noted that the purchase and renewal of railcards can alternatively be done online. Whilst the number of railcards purchased from stations and other TOC's has declined over the past 5 years, the number of railcards purchased online has increased from 65% in 2017 to 78% in 2021. It should also be noted that once purchased, discounted railcard tickets can be purchased in ticket offices, online, at TVM machines and on train.

TF's response to the Schedule 17 consultation highlighted some concerns around the useability of TVM's as an alternative to ticket office staff. ScotRail's TVM's, manufactured by Scheidt & Bachmann's, fully comply with current UK DDA legislation in terms of operational component heights. TVM screens are placed at a height that allows for both standard usage, and to be easily reachable 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's screen (scheidt-bachmann's.co.uk). However, ScotRail acknowledges that further consideration must be given to the functionality of TVM's in line with the specific needs of disability groups, such as screen layout and audio assistance. ScotRail will commit to reviewing the functionality of TVM's and work with Equality Engagement groups to identify areas for improvement.

## 5. Demographics

Using the Scottish Government Census data, ScotRail carried out a review of demographics across each area where Schedule 17 changes have been proposed ([www.scotlandscensus.gov.uk](http://www.scotlandscensus.gov.uk)). ScotRail considered if there was any correlation between passenger assistance requests on the network, and people living with long-term disabilities, health problems or those over the age of 65. ScotRail looked at the number of assists at each stations against the station footfall (appendix 1). Stations with relatively high levels of requested assists per footfall were then cross checked against areas where the percentage of people living with with long-term disabilities, health problems or those over the age of 65 was higher than the Scottish average.

Following a review of this data, Scotrail observed that there is no correlation between passenger assistance data, and areas with higher levels of people living with long-term disabilities, health problems or those over the age of 65. Details of the data used can be found in appendix 1.

## 6. Access to Schools and Hospitals

As part of the Schedule 17 review, ScotRail considered the impact proposed changes could have on schools. The following stations are used by large groups of school pupils who use the train as transport to and from school:

- Crosshill
- Patterton

Crosshill station is located close to Holyrood secondary school, and serves approximalty 150 pupils per day. Our current risk assessment dictates that a minimum of 3 staff members should be present at Crosshill station during school finishing times, Monday-Friday, to carry out Platform Train Interface (PTI) duties. This requirement has been factored into staffing plans and will not change as a result of Schedule 17.

Patterton station is unstaffed and is located beside Eastwood High School, this station serves approximately 100 pupils per day. Our current risk assessment dictates that a minimum of 2 staff members should be present at Patterton station during school finishing times, Monday-Friday, to carry out Platform Train Interface (PTI) duties. This requirement has been factored into staffing plans and will not change as a result of Schedule 17.

In response to feedback, following the ticket office consultation, a recommendation from Transport Focus was 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 has reviewed these stations in response to the feedback and has made the following amendments to our proposals. ScotRail will improve its proposal for Dalmuir and Hyndman stations by maintaining current staffing hours, although the proposed Schedule 17 hours will still be altered. 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 Wishaw station today.

Scotrail will continue with its proposal to change the staffing hours at Mount Florida station, however ScotRail will take steps to ensure the station lift remains in use out with staffing times. Scotrail will continue with its proposals to change staffing at Alexandria station which currently has step free access. Note that Haimyres and Coatdyke stations are both unstaffed and service Hairmyres hospital and Monklands hospitals at present, without issue.

## 7. Anti-Social Behaviour

As part of the Schedule 17 review, ScotRail considered the impact the proposed changes could have on anti-Social Behaviour.

Note: The data used for the analysis and the purposes of the DIA were 2021 records, as this provides a more accurate and complete account of ASB incidents, due to new reporting processes implemented in 2020. ASB can be reported by Staff, BTP, CCTV monitoring, Control and by customers via help points.

Out of 14.4 million passenger journeys in 2021, a total of 621 reported instances of ASB/vandalism took place at all stations across the Scottish Rail Network (0.004% of Pax journeys) in the same year, a total of 30 reported instances of passenger assaults took place (0.0002% of pax journeys). Of the top 20 stations with the highest number of reported instances across the entire network, 15 were staffed and five unstaffed.

Of the 117 stations where ScotRail has proposed changes to ticket office opening times, a total of 311 instances of anti-social behaviour were reported. In addition, 16 instances of customer assaults took place at these stations.

A breakdown of the type of anti-social behaviour, type of customer assaults and top 11 stations with the highest number of reports are detailed in the tables below -

Anti-social behavior instances	
Loitering	103
Wilfil Damage	58
PTI Impact	37
Throwing objects	35
Sitting on platform edge	31
Other	17
Threatening behaviors	15
Carrying a weapon	8
Door interference	5
Theft	1
Pas comms	1
<b>Total</b>	<b>311</b>

Customer assault instances	
Passenger assault - no injury	8
Verbal assault	1
Minor injury	7
Major injury	0
<b>Total</b>	<b>16</b>

Stations with highest number of reported instances	
Westerton	15
Balloch Central	14
Paisley Gilmour Street	13
Dalmuir	11
Drumchapel	11
Hamilton Central	11
Port Glasgow	10
Gourock Saltcoats	9
Dalmarnock	8
Greenock West	8
Singer	9

Comprehensive details of 2021 reports across all 117 stations are located in Appendix 1.

The safety and security of our customers and staff remains ScotRail's number one priority.

Based on the data analysis, and feedback from Transport Focius, ScotRail do not propose any changes, as the the Schedule 17 proposals create an opportunity to proactively target anti-social behaviour, through redeploying resources during key times at stations/on train, to engage with passengers/public in a positive way to influence changes in behaviours.

During the last three months ScotRail has introduced a Travel Safe Team who, since the beginning of December, have targeted a number of stations and routes within Inverclyde, Ayrshire, Lanarkshire, Glasgow, and Dunbartonshire undertaking proactive ASB exercises. During this time we have experienced a significant reduction in reported ASB incidents both during and after the exercises. The Travel Safe Team have reported a total of 447 interventions to date. This is significantly higher than the number of recorded interventions for the whole of 2021 by ticket office staff.

From the 447 reported interventions only four events have required the assistance of the British Transport Police. Passengers and members of the public have complied with requests, changed their behaviours or left the network.

Given the results of the last three months we believe that by creating three additional mobile teams and providing staff with the support, resources, and time to proactively engage with customers, we will make the rail network a safer place for everyone.

The proposed new ScotRail's 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 the relevant training to carry out these duties safely and effectively.

**Q5. Please select all the protected characteristics your work could potentially have a negative impact on, and state how:**

**Disability**

e.g., the impact of a new online process on dyslexic staff, or the impact of changes to how passengers get to a platform on someone who cannot use stairs

Click or tap here to enter text.

**Age**

e.g., the impact of changes to long-service benefits on younger and older staff, or the impact of a long alternative route to close a level crossing on an older person with long-term health issues

Click or tap here to enter text.

**Pregnancy/maternity**

e.g., the impact of team relocation on a woman who is on maternity leave, or the increase in height of a footbridge over the railway

Click or tap here to enter text.

**Race**

e.g., the impact of psychometric testing on the recruitment of people who don't have English as a first language, or the gentrification of an area following station redevelopment that makes retail outlets too expensive for local businesses

Click or tap here to enter text.

**Religion or belief**

e.g., the impact of a new expenses policy on mealtimes or the closure of a level crossing between a community and its place of worship

Click or tap here to enter text.

**Gender**

e.g., the impact of a local decision to adopt arbitrary 'core hours' on women who are more likely, but not always managing childcare issues, or the impact of changes in parking policies on women who are more likely to start work later due to childcare issues

Click or tap here to enter text.

**Sexual orientation**

e.g., the impact of a decision to invite partners to an away day on a gay man who hasn't disclosed his sexual orientation, or the secondment of a lesbian member of staff to a project in a country where this would be a risk to life/human rights

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**Marriage/civil partnership**

e.g., the impact of the extension of private health care to spouses

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**Gender reassignment**

e.g., the impact of a decision to not let staff use taxis for late night events in high-risk areas may adversely affect people who have had, or are undergoing, gender reassignment

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# Step 5: Informed Decision-Making

## Q8. After completing Steps 1–4, what is your decision?

Please select one of the following (for most DIAs this will be option 1) and provide a rationale.

- 1 Change the work** to mitigate against potential negative impacts found
- 2 Continue the work** because no potential negative impacts found
- 3 Justify and continue the work** despite negative impacts (please provide justification)
- 4 Stop the work** because discrimination is unjustifiable and there are no obvious ways to mitigate

### Q8b. Rationale for decision

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ScotRail will pause the closures of Carttsyde, 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.

From the 117 stations proposed to change, 61 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.

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## Step 6: Actions taken

**Q9. What specific actions will be taken to deliver positive impacts and address any potentially negative impacts identified at 'Step 3: Impact' or through consultation?**

Action	By when?	By whom?
Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.

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Click or tap here to enter text.	Click or tap to enter a date.	Click or tap here to enter text.
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## Step 7: Publication

- Please retain copies of this and all completed DIAs in a suitable shared repository.
- Customer-related DIAs may be published on our website.

Step 8: Gateway reviews

Gateway; review date; review authority

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