

Rail

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[By email: ORRretailcode@orr.gsi.gov.uk]

Dear Mr Wilcox,

Thank you for the opportunity to comment on your consultation on a *Code of Practice on retail information* (26 September 2014).

The Scottish Government seeks to encourage greater rail use, to help reduce road congestion and emissions in Scotland. Transport Scotland, as Scotland's transport authority and the franchising authority for ScotRail, is taking action in the next ScotRail franchise period to keep fares down. The Scottish Ministers have capped regulated fares rises in the next ScotRail franchise at the level of the Retail Price Index and off-peak regulated fares increases are capped at RPI-1%. In addition, Abellio ScotRail will introduce a number of fares promotions, including an Advance fare of just £5 between any two Scottish stations.

In order to take advantage of the fares on offer, customers need to know about the options available to them.

Retailers, whether train operating companies or third parties, must be required to offer the best value fare for the journey made by the passenger based on the information available to them, both from the passenger and ticketing systems. Passengers must be aware of the restrictions imposed by the ticket types they are offered, i.e. cancellation policies associated with Advance tickets and travel time restrictions for Off-Peak tickets.



Unlike face-to-face or telephone retail, customers using websites or other technology to purchase tickets must be made aware of the restrictions imposed and also of the ticket types that can be purchased by other means (e.g. at Ticket Vending Machines, which do not have the same range of tickets as are offered at station ticket offices or via the internet).

At present, despite the amount of information available to passengers and the variety of retail channels, passengers cannot always be assured that they have purchased the best value fare for their journey. Due to the complexity of the fares structures and the ticketing systems, ticket anomalies exist – where, on some routes, there is a difference in price between a through and a split ticket for the same journey with equivalent conditions. Abellio ScotRail will introduce a Price Promise Scheme in the next franchise period, to help address the problem of ticket anomalies by offering refunds to passengers who discover a cheaper ticket at a later date, however, more advanced ticketing systems and better information from retailers will help to ensure passengers are getting the best value ticket for the journey they are making at the point of sale.

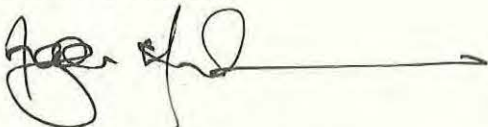
Industry innovation is important and we support the development of smart ticketing, multi-modal tickets and internet sales, however we also want to ensure that passengers in Scotland have the option of face-to-face support from rail staff. In response to the UK Department for Transport's consultation on *Proposed changes to ticket office opening hours* (22 July 2013), Transport Scotland made clear that we expect the ScotRail franchisee to consider how staff placement at stations can support those who do not have access to the IT required to purchase and/or make use of smart tickets.

The proposed Principles-based approach to a Code of Practice appears to offer flexibility, both for existing operations and for future development or innovation. I note that proposed Principle 4 is particularly important for web and Ticket Vending Machine sales, where the customer does not have the direct support of a member of staff at the point of sale.

Furthermore, Transport Scotland would not object to a compulsory, rather than advisory, Code that places obligations on operators to act in the best interests of passengers in relation to the areas for improvement that you have identified.

I hope this reply is helpful and I am content for a copy of this letter to be placed on your website.

Yours sincerely,



Frazer Henderson
Head of Rail Policy
Transport Scotland