

## Petitioner submission of 22 June 2023

### PE1930/K: Ensure customers are always given information on cheapest possible fare in new Scotrail contract

Thanks for the opportunity to comment on the submissions.

On the [ScotRail submission](#) - it's disappointing to hear only talk of a pilot to support the Pay-As-You-Go proposition, and no sense of detail that this scheme is likely to be forthcoming quicker or enable dynamic purchasing. By this I mean the allocation of ticket prices where someone travels at peak for one leg and off peak for the return yet still needs to pay the higher price or, as per the original premise and example of this petition, travels across the SPT boundary for example and unknowingly pays a higher fare for their journey as they were are unaware of the split ticketing savings that would be available. There is no sense that consumer transparency will be enabled from this proposed pilot and it's lacking in any detail of content or timing at present.

On the [Transport Scotland submission](#), it's again disappointing to see an overt recognition of the continuing digital exclusion from the lowest fares for those who don't have the digital confidence and/or skills to access digital tickets to lower their costs. The example given of Super Off Peak Day Returns tickets only being available digitally is disappointing given the Scottish Household Survey figures on continuing digital exclusion for certain groups within society, and is an added example of people having to pay a digital premium to access publicly funded services. Surely that isn't right or a good answer to answering how you are addressing digital exclusion by excluding those without access or skills from accessing the lowest price? It's a further example alongside [Club 50](#) ticket where passengers only save 10% booking over the phone/in person, but receive a 20% discount online. This just seems the latest example of digital exclusion and detriment not being taken seriously, selling paper tickets is still great, but why are the cheapest tickets effectively subject to a non-access premium, especially for those that have barriers to accessing digital platforms, meaning they have to pay more for a similar journey?

It's welcome news that that Scottish Rail Holdings will now to be subject to the consumer duty alongside other public bodies. In theory, this should be another string to the bow of Consumer Scotland in enforcing inclusive practices for customers of public services as well as hopefully strengthening efforts to ensure ScotRail deploy fair advertising, clear and equitable pricing on all ticket types and continue to provide accessible sales of all tickets, albeit the availability of Super Off Peak Day Returns suggests there is still work to be done in mainstreaming these ambitions.

Such actions should all benefit all, but especially consumers with vulnerabilities or known barriers to accessing services. The protection offered by the Consumer Scotland Act 2020 demands that designated public bodies must have regard to the impact of strategic decisions, such as method of sales of all ticket types, on Scottish consumers and with a desirability to reducing harm faced by them. It will be of great interest to see how Consumer Scotland plan to measure compliance with this new duty for ScotRail in this circumstance.