

Response to the National Bus Travel Concession Schemes (Miscellaneous Amendment) (Scotland) Order 2026 targeted Call for Views

Correspondence from Bus Users UK, 8 January 2026

Questions

We would welcome your views on the following questions:

1. Prior to the instrument being laid, were you aware of the proposal to introduce powers to suspend or withdraw concessionary bus travel? Were you consulted during its development?

Yes, Bus Users UK has been involved in the consultation process regarding the proposals.

2. How significant a problem is anti-social behaviour on buses from your perspective?

Anti-social behaviour on buses is a common theme across Scotland, however there is the perception that it is possibly worse than it actually is. We receive very few complaints from passengers that relate to ASB on buses throughout Scotland. Furthermore, our Bus Compliance Officer's who monitor bus services on behalf of The Traffic Commissioner and Transport Scotland, have only witnessed isolated incidents in bus stations. The industry continues to report that it is an ongoing problem, indeed the newest EV coaches introduced in Moray by Stagecoach have driver protection screens installed from new, which is unheard of for interurban coaches. Likewise, Lothian Buses continue to report that some of their front line staff are affected by it, therefore there are incidents that continue to occur across the bus network.

3. Do you agree in principle that access to free bus travel should be capable of being suspended or withdrawn in cases of serious or persistent anti-social behaviour?

Yes, we value the safety and security of all passengers who use bus services. Therefore, there must be robust protocols in place to restrict or prevent access to using them for all passengers, concession card holders or not, for those individuals that are guilty of serious or persistent ASB. Having access to safe, reliable and affordable public transport is crucial for everyone, and ASB enforcement is paramount to this.

4. Does the instrument seem to set out a workable way of addressing antisocial behaviour? And are the procedural safeguards set out in the instrument (such as notice, reasons for suspension and the opportunity to make representations) sufficient to ensure decisions are fair, transparent and workable in practice, including how breaches would be identified and evidenced?

Yes, the instrument seems to be a workable solution in addressing this issue.

Yes, the procedural safeguards set out in the instrument to ensure that fair and transparent appear to be through and robust.

5. What impact, if any, do you anticipate this policy could have on frontline staff and service delivery?

We hope that this policy will provide safeguards for frontline staff by providing them with assurance that recourse action can be taken against individuals which are proven to be guilty of ASB on buses or in bus interchanges/ transport hubs. It is anticipated that the code of conduct acts as a deterrent and enforces accountability of the actions which negatively affect front line staff as well as other passengers.

6. Are there alternative and better approaches to addressing anti-social behaviour on buses than the approach proposed in this Order?

Not that we are aware of, currently all bus companies have conditions of carriage, and any breaches of this by fare paying passengers can result in suspension or restrictions to travel with that operator. We have been involved in such cases previously to ensure that the process is fair and transparent for passengers involved in these types of breaches. If the Government felt it necessary, we could also be involved in any future cases that concern concession card passengers. Happy to discuss further if required.

Notes

Bus Users UK is a national charity campaigning for inclusive, accessible transport. We are an approved Alternative Dispute Resolution (ADR) Body for bus and coach passengers and the body which deals with complaints under the Passenger Rights in Bus and Coach Legislation. We are also part of a Sustainable Transport Alliance, a group working to promote the benefits of public, shared and active travel.