

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

Correspondence from The Confederation of Passenger Transport Scotland, 9 January 2026

- 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. The Confederation of Passenger Transport (CPT) Scotland and our members have been calling on the Scottish Government to introduce these powers since 2023. We, and our members, have been consulted throughout the process by Transport Scotland.

It has also been a regular agenda item and discussion point at the Anti-Social Behaviour working group that CPT Scotland convened in 2024, which is attended by operators, Transport Scotland, Police Scotland, and representatives of Unions, young people's organisations and local authorities.

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

Anti-social behaviour is not unique to bus (or to bus in Scotland), but it is of concern to both operators and passengers. Given there are around 900,000 bus journeys per day in Scotland the numbers overall are low, but incidents can have a significant impact.

Damage and vandalism results in increased costs to operators, with vehicles being taken off the road for repairs and/or bus services being cancelled or rerouted. This can result in passengers and potential passengers potentially being deterred from travelling by bus, and at a time when driver recruitment still remains an industry challenge, could contribute to people leaving the industry, or not joining it.

- 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 Do you agree in principle that access to free bus travel should be capable of being suspended or withdrawn in cases of serious or persistent anti-social behaviour?**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. It is our belief that the right to free travel conferred by the concessionary bus schemes should be accompanied by the responsibility to travel safely and responsibly, and for there to be a potential consequence when this does not happen.

- 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. As stated in the policy note this is part of a multifaceted approach, rather than the only mechanism to tackle antisocial behaviour. We believe it is important that it is laid out in legislation.

While the instrument makes reference to 'travel cards' Transport Scotland have made it clear throughout the consultation process with all stakeholders that this is a limitation of the legislative language, and that it is only the transport entitlement which would be removed or suspended (so for example, the Young Scot Card is retained as it is used for other purposes).

The instrument largely creates an enabling power, and the details of how this will work in practice would be determined as part of the next stage of work, the development of standards/code of conduct.

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

Our members have told us they, and their employees believe it is important these powers exist, as they indicate the Scottish Government takes the issue of antisocial behaviour on and around buses seriously.

The power to suspend or withdraw concessionary travel will be conferred by Ministers, i.e it will not be for drivers or operators to make the decision, or for example confiscate a card (they can however already do this in separate cases where cards are being used fraudulently).

Frontline staff may have a role in recording or reporting incidents to the police which may then be escalated for card removal.

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

As stated in the policy note, this is part of a multi-faceted approach to encourage positive behaviour, including the development of a code of conduct for NCTS users, the development of educational materials outlining expectations of responsible behaviour, and consideration of additional visible safety measures.

CPT Scotland is supportive of all these measures, and will contribute to, or lead on these where required.