

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?

Young Scot was not directly consulted in advance of the 2025/26 Programme for Government policy announcement.

Young Scot CEO Kirsten Urquhart was made aware of top-level conversations to potentially introduce powers via her involvement in the Scottish Government/COSLA Independent Working Group on Antisocial Behaviour. The working group and subsequent report did not support the introduction of restriction or removal of entitlements - see full report here: <https://www.gov.scot/publications/report-independent-working-group-antisocial-behaviour/>

Following the public announcement of the policy in the Scottish Government Programme for Government 25/26, Young Scot CEO reached out to Transport Scotland Policy Team to ask for a conversation, whereby a top-level overview of the proposed scheme was presented. Young Scot CEO recommended that a Children's Rights Wellbeing Impact Assessment was carried out and that young people were consulted and engaged as part of the process and connected them to the Scottish Youth Parliament (SYP) CEO and Travel/Transport conveners/MSYPs for follow up.

Young Scot also requested that any further communications on the policy referred to the removal of the concessionary travel entitlement product rather than the 'card' as the Young Scot National Entitlement card provides wider essential services to young people across Scotland, including legal proof of age, discounts and local authority services including cashless catering. Removal of the 'card' can result in unintended negative consequences for young people and their families/carers.

Young Scot CEO latterly observed a presentation of the proposed scheme during the CPT Antisocial behaviour working group whereby Transport Scotland and Scottish Youth Parliament presented an update on the work they had carried out together on this policy, as well as reviewing a draft of the proposed behaviour code of conduct. Young Scot CEO provided general feedback during the session on creating a more 'plain English' version of the code with a focus on rights to allow young people to ensure they understood what they were signing up to.

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

Young people have contributed their views to the topics of transport and safety in recent Young Scot reports including [Truth About Youth 25](#) (Young Scot), [Impact of Free Bus Transport \(Transport Scotland\)](#) and [Personal Safety \(Police Scotland\)](#). Some summary views from young people include:

- In the Truth About Youth Survey 2025, 51% of respondents reported feeling unsafe on public transport at some point, making it one of the top locations where young people experience fear, alongside streets at night (58%) and city centres (33%). [Truth About Youth Report]
- Qualitative comments highlight harassment, intimidation, and disruptive behaviour on buses, often linked to drunk passengers or groups acting aggressively. Young women reported experiences of sexual harassment and feeling vulnerable when travelling alone at night. [Truth About Youth Report]

- Anti-social behaviour is frequently mentioned alongside youth violence and intimidation, with some young people saying they actively avoid certain routes or times because of safety concerns. [Truth About Youth Report]
- The Police Feedback Report reinforces that anti-social behaviour is a major worry for young people in their communities, including on transport. It notes that such behaviour affects mental health, confidence, and willingness to travel, with some respondents saying they avoid areas or feel anxious about leaving home. [Police Scotland Safety]
- Comments from young people describe feeling “scared to go out” or “unsafe on buses” due to violence and harassment. For LGBTQ+ youth and those with protected characteristics, fear of hate crime adds another layer of vulnerability. [Police Scotland Safety]
- The Impact of Free Bus Travel report shows that while the scheme improved independence and reduced isolation, safety concerns remain a barrier to bus use, especially after young people age out of the scheme. Focus groups mentioned feeling “uncomfortable and unsafe on buses with some weird experiences,” and suggested that visible staff presence and security at night would help. [Transport Scotland report]
- Safety was highlighted as a key factor influencing whether young people continue using buses post-22, alongside cost and reliability. [Transport Scotland report]

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?

From our recent survey/co-design engagement work with young people, **they were not explicitly asked** whether free bus travel should be suspended or withdrawn for serious or persistent anti-social behaviour. None of the surveys or focus groups included a question on this principle. However, there is a strong emphasis on fairness, equity and inclusion in all reports, but also recognition that behaviour affects others’ safety and confidence.

Young Scot supported young people to take part in BBC filming with Morag Kinniburgh, in relation to the programme for government commitment to remove/restrict concessionary travel entitlements which was broadcast across BBC TV and radio. The young people who opted in had all witnessed anti-social behaviour and generally supported the removal of entitlement from ASB offenders. However, they also spoke about fairness and the importance of ensuring that any measures are proportionate and just.

The Scottish Government/COSLA Independent working group on ASB noted in their 2025 report that:

“As a working group, we have not been provided with data regarding the number of incidents to quantify or establish a direct link between the introduction of free bus entitlements for citizens and a rise in antisocial behaviour. Without such information, it is not possible for the group to support the withdrawal or restriction of a travel entitlement. The Working Group supports exploration of proportionate approaches - as adopted in other situations whereby incremental measures are applied such as verbal/written warnings and other sanctions - rather than immediate escalation to direct punitive measures such as entitlement removal that may have wider unintended consequences and that also may exacerbate issues elsewhere in communities.” <https://www.gov.scot/publications/report-independent-working-group-antisocial-behaviour/>

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?

The instrument includes core procedural safeguards, however, from a young person's rights perspective, these safeguards may be insufficient on their own to ensure decisions are fair, proportionate, transparent and enforceable.

For example, the instrument does not clearly set out how breaches will be identified, who will identify them, what evidence will be relied upon, or how that evidence will be shared in an accessible way with young people and their parent/carers where appropriate. Without clear standards and requirements, young people may struggle to understand or have the confidence or means to challenge decisions that significantly affect their ability to travel independently.

While the right to make representations is welcome, its effectiveness depends on accessibility and support. For example, the instrument does not require information to be provided in age-appropriate language or in different formats, nor does it address advocacy or parental/carer support.

Overall, the instrument appears to rely heavily on good practice rather than enforceable rights. From a young person's rights perspective - including under the UNCRC principles - greater clarity on decision-making criteria, evidence, and support for engagement would be needed to ensure the system operates fairly and transparently in practice.

The Scottish Government/COSLA Independent Working Group also considered this in their report:

<https://www.gov.scot/publications/report-independent-working-group-antisocial-behaviour/>

"As a Scottish Government policy, and universal entitlement, focused on eradication of [child] poverty, climate just transition/behaviour change, and widening opportunities for citizens - especially in the current challenging fiscal environment - the enforcement of such an approach would have to be fair, appropriate and in line with other approaches where decisions are made in relation to, for example, a child/young person. This includes consideration of human rights and the UNCRC - a statutory obligation for public bodies and local authorities."

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

Without any firm data/insight or direct bus sector expertise, we can only anticipate that the policy is likely to have a direct impact on frontline staff and service delivery, particularly for bus drivers and other customer-facing roles who may be expected to carry primary responsibility for initiating or enforcing entitlement removal. Clear criteria, protocols, escalation routes and specialist support are essential for all impacted staff, alongside training in conflict resolution, safeguarding and trauma-informed practice. It is also important to provide training and information to maintain a clear distinction between the Young Scot National Entitlement Card and specific travel entitlements loaded onto the card, to ensure removal of travel access does not unintentionally restrict young people's access to other essential services and benefits provided on the card.

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

In the [Transport Scotland Impact of Free Bus Transport report](#), young people suggested improvements such as visible staff presence, better lighting, and security at night to make buses safer. This shows they value measures that protect passengers and maintain order.

The Independent Working Group on Antisocial Behaviour report also highlights case studies of approaches elsewhere in the UK including Travel Wardens:

Case study - *In summer 2024, Stoke-on-Trent deployed six bus wardens/safety officers within their network to primarily deter and prevent antisocial behaviour on buses, as well as to provide reassurance to the travelling public. Officers work in two groups across different shift patterns to cover routes throughout the day and night, with the authority to issue fines for issues such as littering and vandalism. This scheme followed the success in the [Transport for West Midlands](#) area in 2023 where they deployed Transport Safety Officers (TSOs) who worked in co-ordination with local police forces and the British Transport Police to deal with low-level disorder. As well as tackling antisocial behaviour, the approach was part of wider measures to tackle gender-based violence against women and girls, dedicated to tackling incidents involving women's safety, supporting women and girls to feel safer when travelling on public transport. Funding for these approaches have come from local Bus/Transport improvement plans. [<https://www.gov.scot/publications/report-independent-working-group-antisocial-behaviour/>]*

National Entitlement Card Programme Office – NECPO

The National Entitlement Card Scheme is operated by Dundee City Council (acting as the National Entitlement Card Programme Office (NECPO)) on behalf of all Scottish Local Authorities. As part of our response, Young Scot also engaged NECPO, who highlighted the following operation and delivery considerations.

From an operational standpoint, the key issues are:

Governance and due process: Suspending a statutory travel entitlement would require a clearly defined decision-making framework, including transparent evidential thresholds, clear notice to the cardholder, reasons for decisions, and an independent route for representations or appeal. NECPO's role is administrative and technical, and it would not be appropriate for NECPO or delivery partners to act as adjudicators of alleged behaviour, rather than remaining in a purely administrative and technical role.

Children, young people and safeguarding: Given the scale of the under-22 scheme, any enforcement mechanism would need to be proportionate and consistent, with appropriate safeguarding considerations. For under-18s this would reasonably include parental or guardian notification and alignment with existing safeguarding frameworks, particularly where behaviour may be linked to vulnerability or additional support needs.

Local authority delivery impacts: Although policy responsibility sits nationally, any suspension mechanism is likely to create downstream impacts for local authority delivery partners. This may include increased customer contact, complaints handling, and potential safeguarding escalation involving statutory education or social work services. These impacts

are not yet defined or costed and would need to be fully assessed to avoid creating unfunded pressures on councils.

Evidence, identification, and data sharing: Practical implementation would depend on reliable identification of individuals, appropriate evidencing of incidents (especially for children and young people), and lawful data sharing between bus operators, Police Scotland, Transport Scotland, NECPO and local authorities. These data flows would require careful design and clear governance to ensure compliance with data-protection requirements.

Operational and resourcing considerations: Introducing a suspension mechanism would have implications for NEC systems, case handling, audit, and customer communications across the delivery landscape. These impacts would need to be supported by a full operational impact assessment, clear role definitions, and appropriate resourcing before implementation.