

Dear Convener,

We write to the Committee in our capacity as members of the Confederation of Passenger Transport and as operators representing over 90% of bus services in Scotland. The purpose of this letter is to confirm our support for the National Bus Travel Concession Schemes (Miscellaneous Amendment) (Scotland) Order 2026.

As more than half of all bus journeys in Scotland are made by people using concessionary travel schemes, we believe this Order is of fundamental importance. Its provisions are an important first step to allow Scottish Ministers to suspend or remove concessionary bus travel from anyone who breaks the code of conduct. This forms part of a wider efforts to keep employees and passengers safe.

The Order allows for the creation of a code of conduct which, if breached, allows Ministers to consider removing travel. The examples given in the draft code shared with the Committee by the Minister in his letter of 28 January seek to broadly capture situations where travel could be removed. The incidents at the front of our minds are those such as assaults on drivers and passengers and damaging vehicles, including setting fires, meaning they are unsafe to use, thus impacting on availability and reliability and ultimately compromising the service we can offer to passengers.

The Minister has laid out in his letter how the process will work, including appeals and how consideration should be given to appropriate periods for which travel would be removed. We believe this is a proportionate approach and confirms it is not for drivers to make a judgement or take action in the moment to remove travel. Instead, this would be at a later date, supported by CCTV footage (CCTV is installed on 96% of buses in Scotland) and statements or police reports.

Transport Scotland and the Scottish Government are seeking to take a similar approach to other parts of the UK such as London and Manchester, where free bus travel is suspended in cases of criminal or antisocial behaviour, supported by education and engagement work.

There have been queries as to why a national approach to this is required, rather than it being dealt with locally through our own Conditions of Carriage. We believe that as the Concessions Schemes are National Entitlements (rather than determined at the local level) they should be accompanied by a national standard of conduct and potential sanction.

A national approach sends an important message to our staff, passengers and potential passengers that it is not acceptable to endanger the safety of others on a bus. Anyone doing this, could be subject to having their entitlement to travel removed.

A national code of behaviour can also be written into, or signposted to, from individual operator Conditions of Carriage for all passengers, thereby providing a clear, unified standard of behaviour. It would also provide a common language which could be used in educational or other settings when discussing rights and responsibilities, and safe bus travel.

As members of CPT Scotland, we are also working with Transport Scotland and other stakeholders to develop a package of measures that ensure staff and passenger

safety. These include our support for trialling Transport Safety Officers on buses in Scotland, together with supporting local and national education and engagement work on safe and responsible bus travel through programmes such as Transform Scotland's Love My Bus. We also offer free bus travel to uniformed police officers in return for support in the event of any incident where police intervention is appropriate.

We would like to record our thanks to the Minister and Transport Scotland for their ongoing engagement with us, CPT Scotland, and other stakeholders, in developing the draft code of behaviour and Order. We look forward to continuing this once the legislation is in place as we move to the next stage of refining the draft and refining operational processes.

I hope the Committee is reassured of why the Order is a necessary part of a shared package of measures to tackle antisocial and criminal behaviour on buses and provide a safer experience for all.

Yours sincerely,

Sarah Boyd, Chief Executive, Lothian Group

Duncan Cameron, Managing Director, First Bus Scotland

Colin Craig, Managing Director, West Coast Motors

Fiona Doherty, Managing Director, South Scotland, Stagecoach Limited

Alistair Todd, Managing Director, Todd's Travel

Simone Walsh, Managing Director, Scottish Citylink

Sandra Whitelaw, Managing Director, Whitelaws

Tony Williamson, Group CEO, McGills