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Consultation on seat belt requirements for dedicated school transport Analysis Report

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1. Executive Summary

Introduction

Scottish Ministers have had a long-standing intention to make seat belts a legal requirement on dedicated school transport and the current SNP administration included a manifesto commitment on the issue ahead of the 2016 Scottish Parliament Election. Following the devolution of powers from the UK Parliament to the Scottish Parliament in this area in 2015, the Scottish Government launched a consultation to consider future legislation to make seat belts on dedicated school buses mandatory.

Dedicated school transport that is contracted by councils specifically for the purpose of carrying pupils at the beginning and end of the school day is quite distinct from registered public bus services which school pupils may use, paid for by a local authority or otherwise, and there are no plans for any new requirements to extend to such provision. Likewise, vehicles arranged by schools for educational excursions during the school day are not included within the definition.

The majority of local councils in Scotland already voluntarily stipulate the fitting of seat belts in contracts with bus operators for dedicated school transport. Previous high level audits of school buses in Scotland carried out by Transport Scotland in 2012 and 2014 suggest that around 85% of dedicated school transport buses already had seat belts fitted. The proposed legislation is aimed at making this practice universal across Scotland and is similar to measures introduced in Wales which came into force in 2014.

This report analyses and summarises responses that were received through a Scottish Government consultation on seat belt requirements for dedicated school transport. The consultation sought to gather the views of stakeholders and individuals with an interest in dedicated school transport and the proposed legislation.

Consultation Overview

The consultation was launched on 10th March 2016 and closed on 3rd June 2016, with most responses submitted online via the Citizen Space consultation hub.

The consultation included 10 questions, and asked respondents to provide comments, evidence and examples on matters including:

- Whether respondents thought the proposal would make a contribution to road safety;
- Effective ways to encourage children to wear seat belts where provided on dedicated school transport;
- Whether the proposal would disadvantage any young people with protected characteristics;
- Whether the proposal should extend to independent and grant-aided schools;
- Any financial and resource implications which might result from the proposed legislation.

Respondents were also invited to provide comments on any other points they felt were relevant to the specific proposal which was not covered by the questions posed.

Analysis of Responses

A total of 79 responses were received to this consultation with responses received from members of the public, bus operators, local authorities, national organisations, schools, and parent councils. Respondents were broadly divided between two distinct groups for the purposes of analysis: those submitted by members of the public (individuals) and those submitted by groups with an interest or expertise in the topic area (organisations). A total of 59 responses were received from individual respondents with the remaining 20 coming from organisations.

Where respondents have given permission for their response to be made public, these have been made available on [Citizen Space which is accessible via the Scottish Government website](#). All respondents were given the choice to submit anonymously and for their responses to be made anonymous in reporting. All responses were moderated for any potentially defamatory, explicit or offensive material before being approved for publication.

Seven of the ten questions provided responses with multiple choice answer options in the first instance, with respondents then being asked to state the reasons for their views and invited to provide comments, evidence or examples as appropriate.

Analysis of responses was carried out by social researchers within Transport Scotland's Analytical Services. The analysis process considered answers selected from the multiple choice options and focused on the most common comments, or themes offered by respondents, although other points made less frequently were also taken into consideration. As far as possible the analysis has tried to distinguish any notable differences or similarities between individual and organisational respondents.

The key findings from the analysis are briefly outlined below and presented in more detail in the main body of this report.

Main Findings

Responses to the consultation indicated a strong level of support for the proposed legislation, both amongst members of the public and by organisations with an interest in the provision of dedicated school transport. However a small number of respondents did query the likely impact of the proposed changes citing the low rate of accidents involving school buses.

The consultation asked if proposed legislation would help children formulate good habits with almost all of the respondents believing that this would be the case. Some of the respondents highlighted that seat belts in dedicated school buses would reinforce habits set when travelling in family cars. It was also felt that the habit of seat belt wearing can be further encouraged if schools and parents/carers take an active role in promoting their use.

Many respondents highlighted that schools can play an important role in encouraging seat belt use by teaching children the benefits of wearing them through curriculums and road safety educational events. Some respondents also thought that schools and drivers could promote their use by helping children use them and by checking to see whether they are being used consistently. There was also a suggestion that a code of conduct, or a formal agreement be established between the parent and the local authority / school for school bus transport. This could be withdrawn if the child failed to wear a seat belt.

The majority of respondents highlighted that parents and carers were important role models in relation to seat belts, who should ensure that they are always used in family cars. Some parents mentioned ways they had encouraged seat belt use in their cars in a fun and engaging manner. Some organisational respondents suggested ways that parents could actively work with schools and drivers to promote their use.

The consultation asked if the legislation would disadvantage groups with particular needs or protected characteristics. Some respondents felt that the legislation may impact on young people with disabilities, though the majority of respondents did not foresee the legislation disadvantaging any particular groups. Respondents highlighted that some children with physical disabilities, learning difficulties and medical conditions may struggle to use standard seat belts. It was suggested that to ensure these groups have access to dedicated school buses, contracted vehicles may require additional adaptations. A few respondents highlighted that schools will already have support in place for pupils with disabilities who require accessible school transport. It was also suggested by a respondent that different timescales for ensuring compliancy on primary and secondary school dedicated school buses could be viewed as discriminating against older pupils.

Respondents were also asked if the legislation should be applied to independent or grant-aided schools and the majority thought that it should be. Those who commented felt that children should be equally protected, regardless of where they go to school and that the legislation should encourage a single approach to seat belt wearing on dedicated school buses.

The majority of respondents chose not to comment on the possible financial or resource implications of a new legal requirement. The low number of responses to could be due to this question being inadvertently omitted from the Citizen Space version of the consultation for a month. When this mistake was identified all respondents were emailed and given the chance to comment via email. Those that did respond generally supported the view that the road safety benefits of seat belts outweighed the possible financial costs. Responses from organisations highlighted some of the short and medium term consequences that a new legal requirement might have on school bus provision, such as increasing the cost of dedicated school bus contracts and discouraging bus companies from bidding on these contracts. It was also thought that, as some vehicles cannot be retrofitted, smaller coaches may have to be deployed in the medium term. One organisation thought that this could lead to reduced bus capacity on some contracted routes.

Respondents were asked to provide any other comments or thoughts they had on the proposed legislation. The majority of respondents who gave additional comments

repeated their support of the proposed legislation. Others highlighted and queried some of the practical issues that could arise when implementing it. Examples included organisations questioning who would have responsibility for younger children wearing seat belts on dedicated school buses, and how seat belts on school buses would be maintained. Others queried the definition of the term ‘dedicated school buses’, whether clear guidance would be developed for organisations and members of the public on ensuring compliance, and how awareness of any changes would be promoted.

2. Introduction

Overview

The protection of Scotland's children and young people is a priority for the Scottish Government, whilst reducing the number of deaths and serious injuries as a result of road traffic accidents across the country is also a key goal. Seat belts play an important role in keeping people safe while travelling in motor vehicles, as demonstrated by an [extensive body of evidence](#) established over a number of decades.

As such, Scottish Ministers have had a long-standing intention to introduce legislation which would require councils to stipulate, that within any dedicated school transport contracts with bus operators, that the vehicles used must be fitted with seat belts.

The 'Consultation on Seat Belt Requirements for Dedicated School Transport', sought to gather the views of stakeholders and individuals with an interest in dedicated school transport and the proposed legislation. This report analyses and summarizes the consultation responses.

Background to Proposed Legislation

Local councils, as the education authority for their area, currently have a statutory responsibility under section 51 of the Education (Scotland) Act 1980 to consider necessary transport arrangements for pupils living over certain distances from their school. This can take the form of dedicated school transport provision, which refers to vehicles contracted by the council or independent/grant-aided school provider specifically for transporting pupils to and from school at the start and end of the school day.

From 2007 to 2015 a Petition was considered by the Scottish Parliament's Public Petitions Committee ([PE01098: School Bus Safety](#)) calling for:

"the Scottish Government to make provision for every school bus to be installed with three point seat belts for every school child passenger and to ensure that, as part of a local authority's consideration of 'Best Value' in relation to the provision of school buses, proper regard is given to the safety needs of the children."

In response to this petition UK Government Ministers informed the Committee that powers would be devolved to allow measures to progress and, in 2014, the then Minister for Transport and Veterans [announced](#) that the current [Scottish Government intended to legislate](#) in future to ensure that seat belts are provided on all dedicated school transport.

During 2015, the UK Parliament devolved powers to the Scottish Parliament, via an Order under section 30(2) of the Scotland Act 1998, to allow the Scottish Parliament to enact legislation making seat belts a legal requirement on dedicated school transport. The powers are restricted to the regulation of the description of such vehicles, meaning any future Scottish Parliament legislation

cannot stipulate the precise technical specification of the seat belts required, such as whether that should be 3-point belts or lap-belts.

Many local councils in Scotland already voluntarily stipulate seat belts as a condition in contracts with bus operators for dedicated school transport with local councils. In high level audits of local authorities carried out by Transport Scotland in 2012 and 2014, it was found that around 85% of dedicated school buses in Scotland had seat belts fitted. Furthermore in 2014 local government indicated that 17 councils do so on all contracts and a further 6 have some provision.

Safety of Children on School Buses

Whilst the injury of any child on a bus is a significant issue, the number of child casualties on buses as a result of a road traffic accident in recent years is relatively small. Between 2009 and 2015 (the latest year for which figures are available), no children were killed while on buses or coaches, and an average of 3 suffered a serious injury each year. It should be noted that these figures refer to travel on all buses and coaches (for instance, general service buses), not just those used for home-to-school transport alone.

There were an average of 42 children slightly injured while on buses or coaches in the years between 2009 and 2015. For figures on individual years see Table 1 below.

Table 1 Children injured on bus/coach journeys in Scotland between 2009-2015

Child (0-15) bus/coach casualties by severity, 2009-14¹								
	2009	2010	2011	2012	2013	2014	2015	2010-15 average
Slight	51	47	49	42	48	28	40	42
Serious	2	7	4	1	3	2	2	3
Total	53	54	53	43	51	30	42	45

Research in 2012 found that almost 2,100 dedicated school buses were being used each day to transport pupils to school. Ensuring universal seat belt provision (and encouraging their use) on such vehicles will mean school pupils are afforded the associated safety benefits if future accidents occur.

Consultation Overview

This consultation was designed to gather the views of stakeholders and individuals with an interest in dedicated school transport to help inform and shape proposed legislation to make seat belts mandatory on dedicated school buses. It was launched on 10th March 2016 and closed on 3rd June 2016.

The consultation asked respondents to provide views, evidence and examples on matters including:

¹ Source: Reported Road Casualties Scotland 2015

- Whether respondents thought the proposal would make a contribution to road safety;
- Effective ways to encourage children to wear seat belts where provided on dedicated school transport;
- Whether the proposal would disadvantage any young people with protected characteristics;
- Whether the proposal should extend to independent and grant-aided schools;
- Any financial and resource implications which might result from the proposed legislation.

Respondents were also invited to provide comments on any other point they felt was relevant to the specific proposal which was not covered by the questions posed, but more general views on road safety were discouraged to aid the analysis process and consideration of next steps. A full list of the questions asked is provided in Annex A. Where respondents have given permission for their response to be made public, these have been made available on the Scottish Government Citizen Space website. Before approval for publication all responses were moderated for any potentially defamatory, explicit or offensive material.

Report Structure

The findings from the analysis are presented in detail in the following chapter.

3. Analysis of Responses

Overview

The consultation contained 10 questions relating to the proposal to make seat belts a legal requirement on dedicated school transport. The following sections discuss the detailed findings from the analysis of responses received in relation to each question or issue as appropriate.

Analysis of Responses

A total of 79 responses were received – 59 of these came from individual respondents (members of the public) with the remaining 20 from organisations (such as bus operators, local authorities, professional organisations, schools, and parent councils). Responses from people asserting that they represent an organisation were taken at face value, as there was no way of fully verifying this. The analysis identifies, where possible, any notable differences in responses between individual and organisation respondents.

A breakdown of the background of respondents is presented below in table 2.

Table 2 Profile of Respondents

Group	Number
Members of the Public	59
Bus Operators	2
Local Authorities	7
Professional Organisations	3
Schools	2
Parent Councils	6
Total	79

Seven of the questions had multiple choice options in the first instance, with respondents then being asked to provide open text responses to state the reasons for their views and supply evidence or examples as appropriate. Responses to the multiple choice questions are presented in chart form at the beginning of each section. All of the open text responses to the comment section were read and categorised according to theme and key messages drawn out. Tables providing the number of, and type of responses to each multiple choice question is given in Annex B.

Statistical analysis was not appropriate for the written responses included in submissions. However, in considering the balance of views expressed we use the following reporting conventions:

- “Some” to refer to 4 or fewer respondents.
- “Several” to refer to between 5 and 10 respondents;
- “Many” to refer to more than 10, but less than half of respondents.

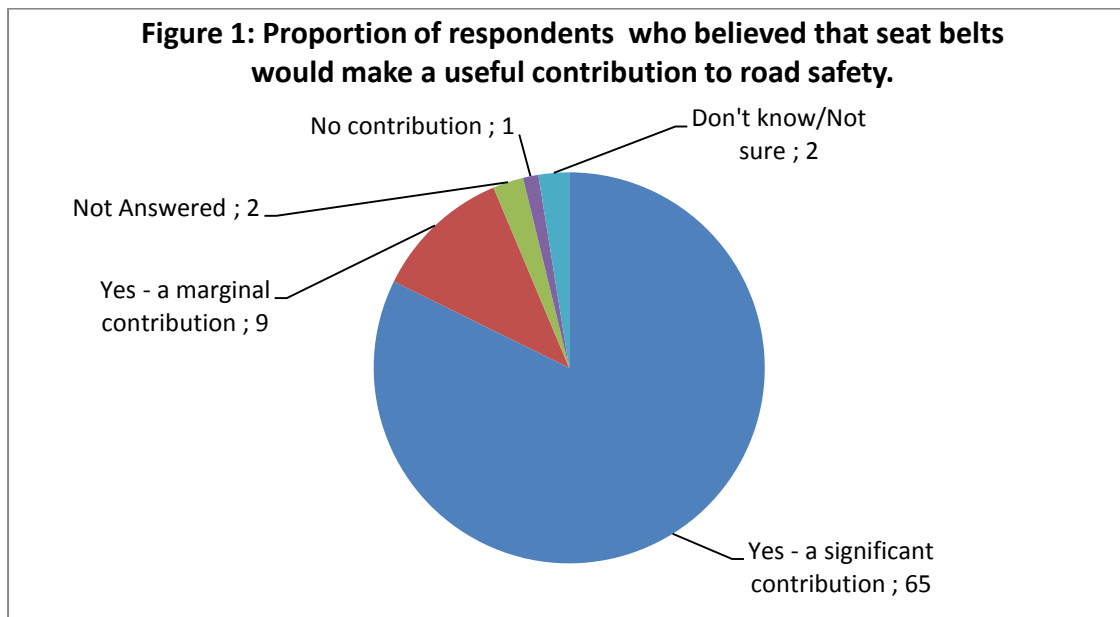
“Most or “the majority” to refer to more than half of respondents.

Where respondents provided detailed feedback relating to a particular aspect of the consultation which was not relevant to the question which they were answering, it has been considered accordingly along with other comments on that theme or issue, even if it was not directly in response to the specific intended question. For example, people may have provided details relating to the role of parents in response to question 1 rather than question 4 as intended.

Contribution to Road Safety

Q1: Do you believe seat belts on dedicated / contracted school buses would make a useful contribution to road safety?

Almost all respondents (74) from both the individual and organisation groups believed that seat belts on dedicated/contracted school buses would make a useful contribution to road safety. Only three respondents said that it would make no contribution or did not know / not sure and a further two did not answer this question. Most respondents thought that seat belts would make a significant contribution (65) or a marginal contribution (9).



Respondents were asked to provide further comments in relation to their response to this question. The most common themes identified included comments that seat belts:

- would reduce the number of children injured on school buses;
- stop children moving around when on the bus, which in turn would reduce driver distraction;
- encourage positive behaviour on bus journeys.

Individual respondents were very supportive of the proposed legislation and the vast majority thought that it would make a significant contribution to road safety (54). Four of the respondents suggested that the inclusion of seat belts could improve overall

behaviour on buses and reduce driver distraction. Some expressed surprise that seat belt use was not already compulsory on dedicated school buses.

Two of the individual respondents thought that the mandatory use of 3 point seat belts could further improve road safety as existing evidence shows that they can reduce the severity of injuries. One of these respondents queried why the use of a 3 point seat belt had not been explicitly mentioned in the consultation document, and felt that it was a big omission.

Generally organisations were also supportive of the legislation with eleven of the twenty organisations thinking that it would make a significant contribution to road safety. Several organisations thought that the legislation would only make a marginal contribution (6) and they suggested possible barriers that might impact the legislation's effectiveness. Five of these organisations highlighted the low number of road safety incidents involving school buses and so thought that the safety benefits of seat belts may be marginal:

“Whilst the introduction of seat belts may be viewed by parents and the public as improving safety, the actual impact may be marginal due the low rate of traffic accidents within this category. However, where seat belts are provided and worn by pupils, it is likely that their safety would be improved should the vehicle be involved in a RTA [Road Traffic Accident]” (Local Authority)

One respondent from a professional organisation suggested that other interventions may present better value for money than the proposed legislation:

“... the safety benefits of seat belts may be relatively limited, and that given the potential extra costs involved for some local authorities, other safety initiatives based around school bus travel, such as safety education, may have greater benefit at less cost.” (Professional Association)

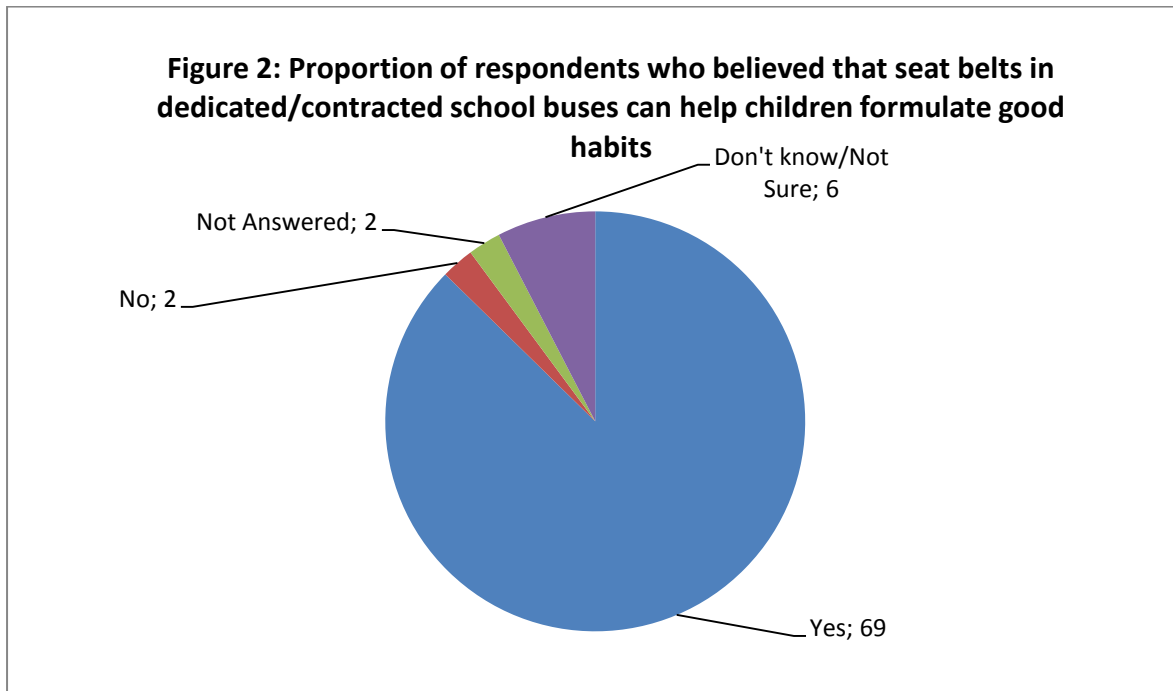
Summary of responses to Question 1:

Almost all of the respondents thought that the legislation would make a positive contribution to road safety. Some responses received from organisations highlighted that the impact of legislation may be marginal due to the low rate of accidents involving school buses.

School Bus Seat Belts and the Formation of Good Habits

Q2: Do you believe that having seat belts on dedicated / contracted school buses can help children formulate good habits in relation to seat belt-use more generally, for example when in cars?

The majority of all respondents (69) to the consultation thought that school buses having seat belts can help children formulate wider good habits in relation to seat belt use more generally. This belief was shared by both individual (56) and organisational respondents (13). Eight respondents thought that it would not - or were unsure - if it would make a difference, and a further two did not answer the question.



The most common explanations given in the open text section for how it would help children formulate good habits more generally included:

- how it would reinforce habits encouraged by parents in family vehicles;
- encourage children to use seat belts in other vehicles;

Some respondents in the individual group thought that the habit of seat belt wearing on school buses would complement and reinforce habits established by seat belt use in family cars. One individual commented that seat belts on school buses would encourage children to establish longer term habits that would continue into adulthood. Two individual respondents with children thought that a lack of seat belts on public transport undermined this habit. As one of them highlighted

“... young people already understand the importance of wearing seat belts in cars, but they are less accustomed to doing so on public transport... having transport to and from school fitted with seat belts would help promote a belt up culture.” (Individual)

Other individuals commented that seat belt wearing in cars is perceived by children as routine and they are automatically worn through habit. This routine was thought by an individual as being cultivated through consistent use and that the lack of seat belts on school buses disrupts this routine.

Three organisations also thought that seat belts in school buses would promote seat belt wearing more generally and encourage children to wear seat belts in other vehicles. They felt that the proposed legislation would be more effective in helping children form good habits if supported by schools and parents. For instance one bus operator suggested that seat belt use on school buses can impact on children’s use of seat belt in other vehicles if:

“...it forms part of the educational programme, with schools explaining to pupils the benefits of seat belts and the need to use them, and if reinforced by parental/carer behaviour outside the school environment.” (Bus Operator)

However as one individual respondent highlighted pupils behaviour on school transport are more likely to be influenced by peer pressure from other children.

Summary of responses to Question 2:

Almost all of the respondents thought that having seat belts in school buses would help children formulate good habits. It was highlighted by some, how it would reinforce habits set at home for instance when travelling in family cars. Some respondents also thought that seat belts in schools buses would encourage children to wear seat belts in other vehicles and promote a culture where seat belt wearing is normal and routine.

Role of Schools

Q3: How do you think schools can play a role in helping to educate and support children in the wearing of seat belts (particularly on dedicated / contracted school buses)?

Many of the respondents from both the individual and organisation groups (64) provided suggestions of ways that schools could help educate and support children in wearing seat belts.

The most common suggestions were that schools could:

- educate children in the importance of wearing seat belts;
- make seat belt use on school buses mandatory and also enforce this;
- arrange for teachers to supervise pupils on dedicated school transport and school trips.

Both individuals and organisations thought that schools have an important role in educating and supporting children, with forty eight respondents suggesting using lessons and learning activities to encourage seat belt use. Suggested ways schools could assist included having curriculum activities on bus safety, which may involve having professional speakers and talks on the subject. There was also a suggestion that guidance be developed for teachers and schools on the use of seat belts. As one respondent from a local authority highlighted:

“The provision of seat belts alone will not promote a safer travelling environment in school buses. In many instances children may not wear seat belts where provided. Schools need to take an active role in promoting best practise and implement a programme to encourage school children to wear seat belts when travelling on school buses.” (Local Authority)

One individual respondent suggested that educators could encourage pupils to:

“...check that the person next to them is strapped in and helping each other to remember – ‘I’m strapped in – are you?’” (Individual)

Nine of the individual, and two of the organisational respondents suggested that schools and drivers could provide a supervisory role in ensuring children are wearing seat belts. One school provided details of how it currently enforces the use of seat belts on school buses:

“Primary buses won’t depart unless pupils use seat belts. During the transition days, from Primary school to Academy, the message about the importance of wearing seat belts is again explained. On school trips buses won’t depart unless pupils use seat belts.” (School)

One local authority respondent suggested that as well as schools promoting seat belt use in their curriculum, staff could carry out periodic checks of seat belt compliance on school transport before it leaves school. They also suggested that the compulsory wearing of seat belts be included in the code of conduct issued to parents whose children receive free school transport. Another local authority respondent highlighted that several councils already use similar codes of conduct to reduce risk on transport. A professional organisation recommends that if codes of practice like these were to be encouraged at a national level then schools should be provided with clear guidance on best practice.

Summary of responses to Question 3:

Many respondents thought that schools have an important role to play in supporting seat belt use by promoting it in learning activities. It was also felt by some that schools and drivers could provide a supervisory role in fitting seat belts and also checking compliance. Another suggestion was that compulsory wearing of seat belts be included in the code of conduct issued to parents whose children receive free school transport.

Role of Parents and Carers

Q4: How do you think parents and carers can play a supporting role in encouraging children to wear seat belts (particularly on school buses)?

Respondents from both the individual and organisation groups (65) provided suggestions of the supporting roles parents and carers can have in supporting children wear seat belts (particularly on buses).

The most common suggestions were that parents and carers could:

- provide their children with advice and information;
- promote use of seat belts in family vehicles;
- be positive role models by themselves always wearing seat belts.

Responses from parents and carers highlighted techniques they already use to encourage their children to use seat belts this included talking to them about the importance of using a seat belt in whatever vehicle they are travelling in. Others highlighted how parents and carers are important role models and how through their own seat belt use can help reinforce the importance of children doing the same. One individual highlights these themes:

“Setting a good example and role modelling their use. Highlighting the importance of this with children when they get on their school bus and in conversation with bus drivers.” (Individual)

A response from a parent council organisation gave suggestions on how parents could encourage seat belt use at home and by actively supporting schools:

“Talk about it at home, especially before school trips on buses. Be a parent helper on a trip and assist with fastening seat belts. Ask the school to discuss or bring in a partnership organisation to discuss road and travel safety for health prevention.” (Parent Council Organisation)

Another organisation mentioned how parents and carers could play an important role in discussing with children the reasons for using seat belts:

“Parents need to support the schools with clear messages to their children of why this is being introduced and the potential benefits in an accident scenario. They must also support the school in dealing with incidents where children have been reported for refusing or failing to use a seat belt where required to do so.” (Professional Association)

Reinforcing this view a local authority respondent highlighted how:

“As no-one is currently legally responsible for the wearing of seat belts by 3 – 14 year olds on buses, parent/carers must play a crucial role in encouraging their children to do so. By reinforcing the use of seat belts in cars and explaining to children that they also need to undertake the same behaviour on buses it should lead to increased usage of seat belts on buses.” (Local Authority)

Another local authority respondent suggested that there may be consequences if parents fail to do this:

“[parents] must understand that transport rights can be removed due to the failure to comply with the code of conduct meaning it is their responsibility to ensure their child reaches school.” (Local Authority)

One individual respondent mentioned that there should be a formal agreement which parents/carers should sign which gives an undertaking that their child will use school bus seat belt. They suggest this could be simply:

“...added to parental consent forms. Schools already seek parental and pupil agreements on other areas of school expectations (eg uniform, timekeeping, homework, photographs).” (Individual)

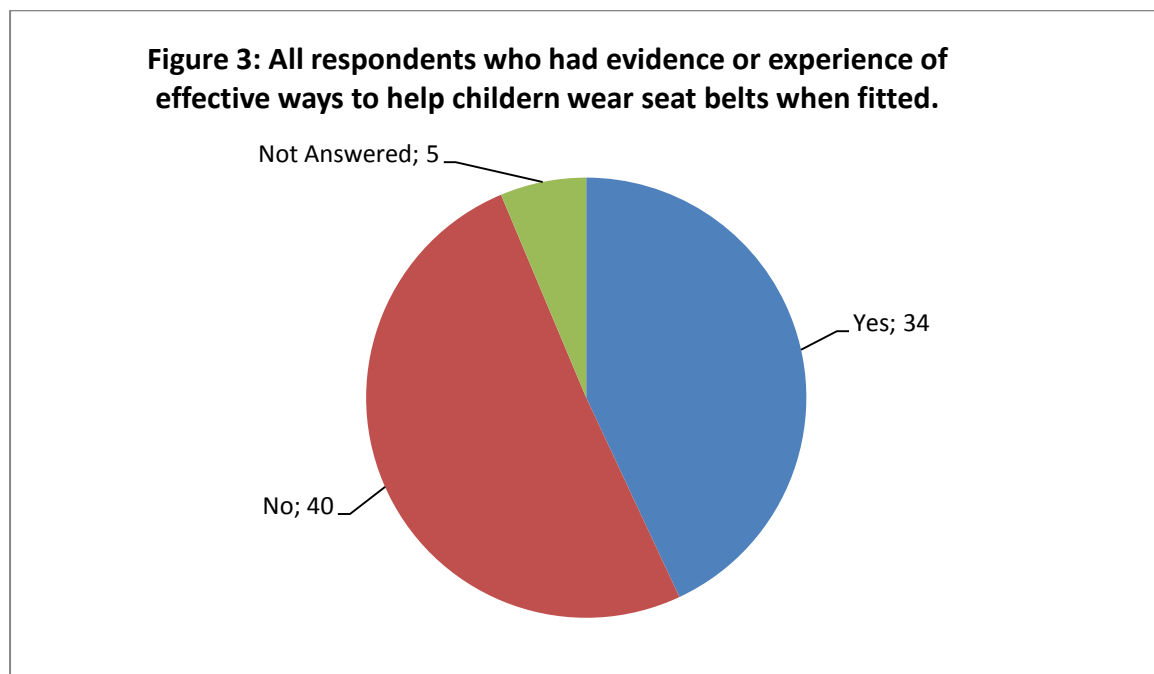
Summary of responses to Question 4:

Most respondents highlighted the important role parents and carers can play in supporting children to wear seat belts on schools buses. This included ensuring that seat belts are used in family cars and acting as positive role models. It was suggested that a code of conduct, or a formal agreement be established between the parent and the local authority for school bus transport. This could be withdrawn if the child failed to wear a seat belt.

Effective Strategies to Encourage Seat Belt Use

Q5: Do you have evidence or experience of any particularly effective ways to help children wear seat belt when they are fitted in vehicles

Thirty four of the respondents said that they had evidence or experience of effective ways to encourage children to wear seat belts in vehicles.



Most of these respondents provided personal experiences of how they had encouraged children to wear them. Some of the most common suggestions were:

- the importance of positive reinforcement by parents and teachers:
- clear and honest messages about why seat belts are used:
- checking that seat belts are worn before travel.

Reflecting responses to Questions 3 and 4 (role of schools and parents / carers), respondents from both groups (34) suggested that parents and teachers have an important role in positively reinforcing and educating children in effective seat belt use. It was suggested that this should be done from an early age in a fun and engaging way, with the message being constantly and consistently reinforced throughout childhood. One individual respondent mentioned how parents / carers of

young children could make ‘strapping up’ a competition by getting them to do it as quickly as possible. They also suggested:

“...[as][recommended in aircraft (though not widely publicised), getting children to close their eyes and unlock and lock theory seat belts into position 3 times thereby improving ‘muscle memory’ and enabling a quick release of necessary. Again, smaller children find this fun!” (Individual)

As one organisational respondent from a school highlighted it may be harder to encourage older children to wear seat belts than younger children.

Others highlighted the important role school bus drivers could play in encouraging seat belt use by ensuring that seat belts are worn before departure and refusing to drive if seat belts are not worn:

“The drivers who wait until the children are strapped in really encourage the use of the belts as the message is the bus doesn't move until you are in safely.” (Individual).

However as a response from one local authority highlighted ensuring that children remained strapped in throughout the journey may cause issues:

“...monitoring of this and control is impossible for the driver, as he must concentrate on the road ahead.” (Local Authority)

One road safety organisation suggested looking at evidence from other countries where similar legislation has been introduced (i.e. Wales), and also looking at research reviews published on the Road Safety Observatory website.

Summary of responses to Question 5:

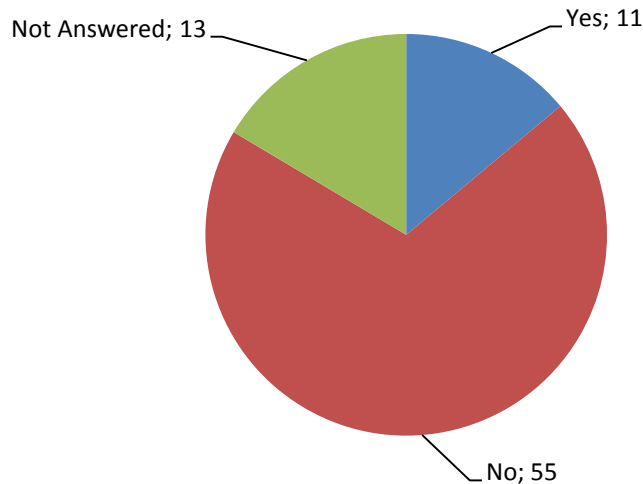
Drawing upon personal experiences a number of respondents gave examples of how they had encouraged children to use seat belts. Some of these examples focused on engaging children from an early age, and making seat belt use fun. Others flagged up the important role bus drivers could have in checking seat belts use before setting off on a journey.

Impact on Young People with Particular Needs or Protected Characteristics

Q6: Do you foresee any young people with particular needs or protected characteristics – such as physical disability, religious belief, gender or learning difficulties – being disadvantaged by the proposals to legislate for seat belts in all dedicated/contracted school buses?

The majority of respondents (55) did not foresee young people with particular needs or protected characteristics - such as disability, religious belief and gender - being disadvantaged by the proposals. Thirteen respondents did not answer the question, with eleven saying that it may disadvantage such young people.

Figure 4: All respondents who foresee young people being disadvantaged by the proposed legislation.



In the additional comments section for this question respondents provided further information on their response. Some highlighted that children with physical disabilities and learning difficulties may struggle to use standard seat belts, and so additional support may be needed. This support could be through escorts / carers fastening belts for the children and providing close supervision, through to adaptations to vehicles to ensure that all children can be safely strapped in. However a couple of organisational respondents highlighted that there is often already dedicated school transport for disabled children which are already fitted with restraints. As a local authority respondent highlighted:

“...children with physical or learning disabilities are often provided school transport by taxi or minibuses, where wearing seat belts is already a legal requirement.” (Local Authority)

One organisation highlighted that Scotland's approach to supporting children and young people - 'Getting It Right For Every Child' (GIRFEC) requires that individual needs be taken into account and support considered on a case by case basis by partner organisations. A professional organisation in their response flagged up that the Scottish Government should work with groups representing such children to ensure that the seat belt requirements are equally appropriate.

A couple of respondents mentioned that some children may already have a medical exemption certificate from wearing seat belts, and that this should be considered in the development of the legislation.

Although most of the comments to this question were in relation to the impact of the proposed legislation on those with a physical disability and/or learning difficulty, a small number of respondents highlighted issues in relation to age. Their responses mentioned that children under the age of twelve may struggle with a three point seat belt, and so it would more appropriate to install lap belts instead. As a respondent from a road safety organisation highlighted:

“...as with child restraints currently approved for use in cars, there is no single fit option for children of all ages or stature. Current lap belt or three point adult seat belts are not appropriate for all children and it had been suggested through some research [it] could cause more harm to the wearer.” (Road Safety Organisation)

A local authority also flagged up the proposed different timetable for the implementation of vehicles carrying primary and secondary school pupils and how it unfairly differentiated because of age. The proposals are that the new requirements will come into force in 2018 for vehicles transporting primary school children, and 2021 for vehicles for secondary school children. They suggest that this:

“...implies the life of a primary pupil is more important than that of a secondary pupil, which we could not support. Whatever deadline date is chosen, all pupils should be considered equally. Indeed, some may argue that pupils are being discriminated against on grounds of their age by having two separate deadlines.” (Local Authority)

This local authority also suggests that the 2021 deadline for having compliant vehicles for secondary school pupils was not appropriate to them as many of their contracts:

“...use the same vehicle to serve both a primary and secondary school and so a primary deadline of 2018 would not spread costs in two phases (2018 and 2021) and would, instead, see a higher number of vehicles requiring seat belts by the 2018 deadline.” (Local Authority)

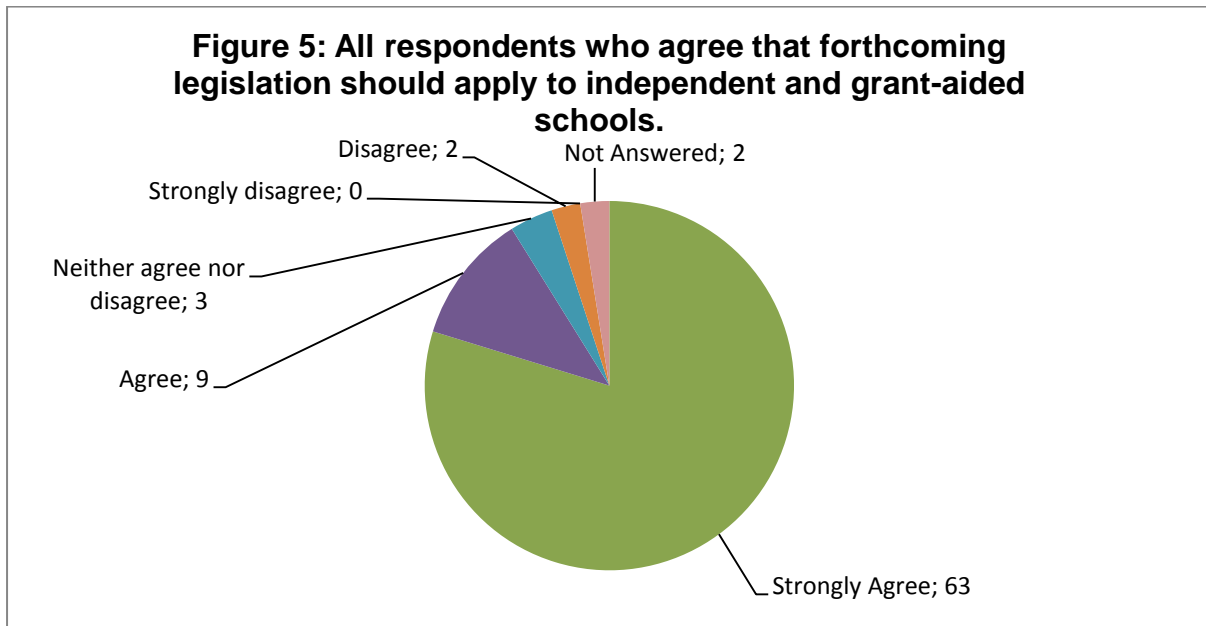
Summary of responses to Question 6:

Although most respondents felt that the legislation would not disadvantage particular groups there were comments that it may impact on those with physical disabilities and learning difficulties. It was suggested that additional adaptations to vehicles may be required, and that carers / escorts would need to ensure seat belts were used correctly. There was also a concern that children under the age of twelve may struggle with a three point seat. The different timescale for ensuring primary and secondary school vehicles were compliant was also viewed as potentially discriminating against secondary school pupils.

Extension of Proposal to Independent or Grant-aided Schools

Q7: To what extent do you agree or disagree that any forthcoming legislation proposed should also apply to independent schools or grant-aided schools (which are not subject to the same duties as local authorities to provide transport for school pupils living out with statutory walking distances)?

Most of the respondents either strongly agreed (63) or agreed (9) that the forthcoming legislation should be applied to independent or grant-aided schools. Two of the respondents did not think it should be applied to independent or grant-aided schools but did not expand on their reasons why. Both individual (49) and organisation (14) responses were strongly in favour of the legislation being applied to independent or grant aided schools.



Respondents from both the individual and organisation groups who commented (16) thought that all children, regardless of school type, should be covered by the legislation:

“Children are equally in need of being protected, regardless of where they go to school.” (Individual respondent)

Whilst it was commented that some independent schools may already have such requirements in place, formalising such a situation would:

“...ensure a common approach to this issue, whether or not they are subject to the same duties as local authorities.” (Professional Association)

One individual respondent suggested that creating such a distinction between types of schools could create a road safety inequality. It was also mentioned how children attending independent schools may use contract school buses too and so it was important that the legislation applied to all schools.

A local authority respondent highlighted how independent school pupils may use buses that travel greater distances to school and consequentially spend more time on the school bus, and so the same legislation should be applied to the vehicles they use.

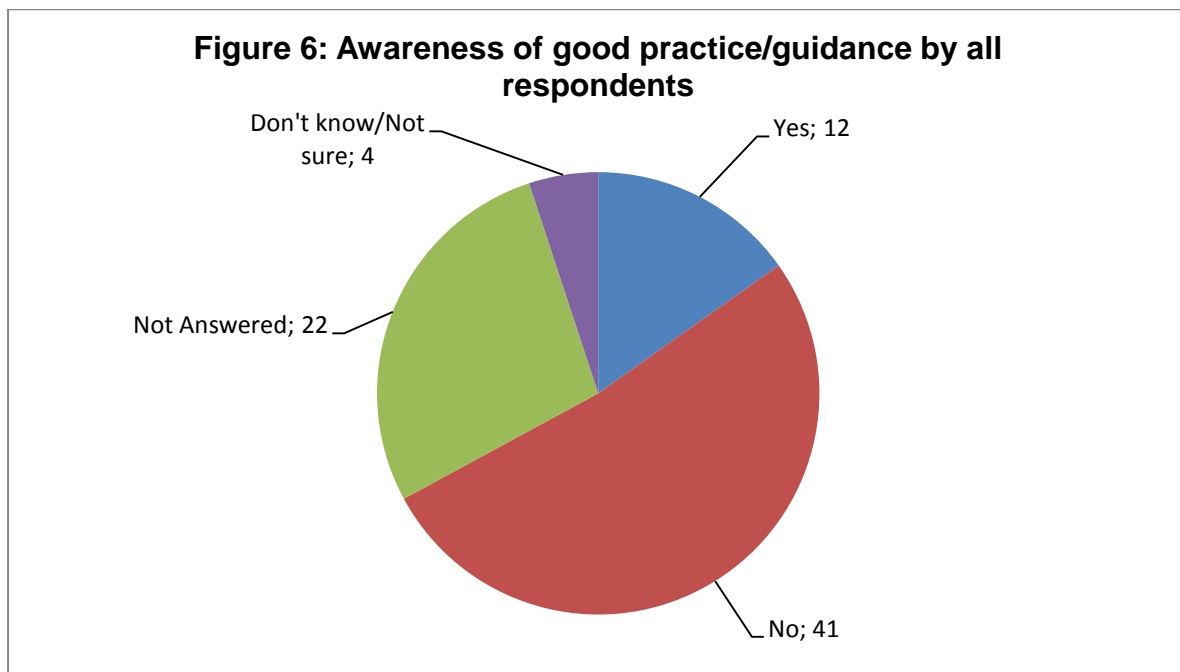
Summary of responses to Question 7:

Almost all of the respondents thought that the legislation should apply to independent or grant-aided Schools. Reasons given included that all children regardless of school attended should be equally protected.

Good Practice and Guidance

Q8: Are you aware of any good practice/guidance or other measures that have successfully encouraged the wearing of seat belts provided on school buses by pupils of all ages?

The majority of the respondents (45) did not know of, or were unsure, of any good practice guidance that has successfully encouraged seat belts use on school buses. A further twenty two respondents did not answer this question. However twelve respondents were aware of good practice or other guidance – nine of these were individuals and the remainder from organisations.



In the open text comments for this question, there was a number of examples given of good practice / guidance. Examples included:

- Teachers encouraging road safety discussions in class;
- Buses not moving unless seat belts are worn by all children.

Some of the individual respondents provided examples of where they thought good practices had encouraged seat belt use. This included bus drivers refusing to drive unless all children are using a seat belt. Others mentioned learning activities at schools:

“My daughter’s primary school got the younger children to practice getting on the bus in an orderly fashion and putting on their seat belts without actually being driven anywhere so that they were prepared for when they did go on excursions.” (Individual)

Resonating with comments provided to other questions, three of the responses from organisations also suggested that teachers had a key role to play by involving pupils in discussions on road safety and seat belt wearing. One respondent from a local

authority suggested that other organisations, and professionals can play an important role in these learning activities:

“School pupils need to understand the importance of wearing seat belts while travelling on the bus. Road Safety Officers, Police, Schools, Local Authority Officers and Parents are among the partners that can influence and reinforce the importance of wearing seat belts.” (Local Authority)

One response from a local authority mentioned how several councils use a code of conduct to reduce risk on transport which has led to a reduction of incidents. However no further information was given on this code and whether it explicitly mentions the use of belts on school buses.

Some respondents suggested that supervision on buses by teachers or others could encourage good practice. This was an issue covered by responses to other questions, however as a response from one bus operator highlighted:

“In Wales where this has been a mandatory requirement since 2014, experience indicates that where children are unsupervised the use of belts is limited. Where teachers or other educational staff accompany the children, compliance is far greater.” (Bus Operator)

Summary of responses to Question 8:

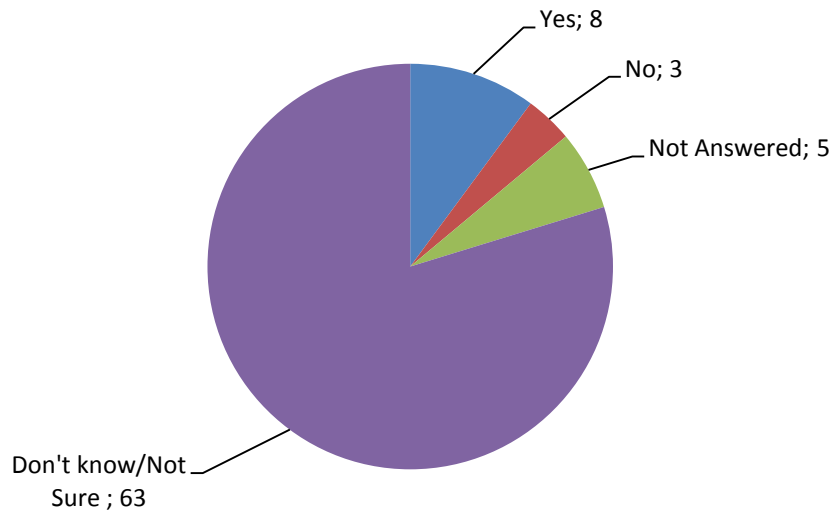
The majority of respondents did not know of any good practice or guidance that might be used to encourage seat belt use on school buses. Where such information was provided it focused on local initiatives such as drivers not leaving unless all children were belted up, or school learning activities. The experience from Wales where seat belts have been mandatory since 2014 suggests when children are left unsupervised on buses that belt use is limited.

Financial and Resource Implications

Q9: Do you foresee any funding or resource implications that would stem from the new legal requirement, particularly given the implementation timetable aimed at preventing contracts having to be broken?

The vast majority of respondents to the consultation did not respond to this question (63), with a further five not knowing if the legislation would have any financial or resource implications. The low number of responses to this question could be for a number of different reasons but one reason could be due to Question 9 being inadvertently omitted from the Citizen Space version of the consultation for a month. When this mistake was identified all respondents were emailed and given the chance to comment via email. Out of the eleven who did answer this question, eight thought there would be funding implications and most of these responses came from organisations. Three did not think it would have an impact.

Figure 7: All respondents who foresee funding or resource implications.



Respondents were then invited to provide comments on if they foresaw any funding or resource implications. Some issue identified included:

- The cost of retrofitting buses without seat belts;
- The cost of replacing unsuitable buses;
- The possible cost implications for local councils due to the increase in price of school bus contracts.

Generally individuals highlighted that although there would be financial and resource implications in ensuring vehicles were compliant these costs would be outweighed by the increase in safety of children on school buses. However as one individual queried:

“will the cost implications be transferred to parents or impact on local authority budgets?” (Individual)

Respondents from organisations were much more concerned with the possible negative impact of the changes on market provision particularly in the short to medium term. It was highlighted how existing double decker buses may not be suitable for retrofitting and so would need to be replaced to meet the new requirements. There was a suggestion that in the short to medium term this would result in more coaches being used due to them having smaller capacity, leading to increased fuel and staffing costs. It was felt by some that this issue along with the cost of retrofitting buses could dissuade smaller companies from continuing to operate on the market. It was suggested that this could lead to fewer companies tendering for school bus contracts which may lead to local authorities having to pay more for school transport.

As noted in a response from one professional organisation, the costs of introducing the requirements would not be uniform across all of Scotland though:

“...while some local authorities may have achieved full seat belt status already, other local authorities are still highly dependent on the use of non-

seat belted buses to deliver school transport. It is the authorities in the latter group that are likely to see more significant cost implications arising from a mandatory requirement to specify seat belts on all school buses.”

(Professional Organisation)

An individual respondent suggested that the cost of retrofitting vehicles could be covered by road safety grants on a case-by-case basis. However as a major bus operator observed that there would be other on-going costs once existing vehicles have been retrofitted, as the seat belts would need to be maintained and repaired:

“...A bus or coach needs to be re-certified if seat belts are fitted and these are checked as part of the MoT process – all of which increases costs. Retrofitting seat belts to more modern low floor vehicles can be problematic and schools work is unlikely to be able to justify new seat belt fitted buses.” (Bus Operator)

Another major bus operator commented:

“Whilst it is undeniable that seat belts are a major contributor to road safety, there is no appreciable problem to address therefore the costs will be considerable and the benefits negligible.” (Bus Operator)

A local authority noted that they had recently had to ensure that buses were Disability Discrimination Act (DDA) compliant and as they described it the introduction of seat belts would be a ‘double whammy’ for them.

However another local authority mentioned that seat belts had already been installed on dedicated school buses in their area, and the requirement had been included in the condition of contract when they had retendered the services. They flagged up there had been no increase in contract costs as a result of this but acknowledged that their experience may not be shared by other authorities.

Summary of responses to Question 9:

Although most respondents to the consultation chose not to respond to this question, responses from the individuals generally supported the view that the road safety benefits of seat belts outweighed the financial costs. However organisational responses flagged up some of the financial and non-financial consequences of implementing the changes particularly in the short to medium term. This included how it would not be possible to retrofit all vehicles particularly larger capacity double-decker buses, resulting in coaches with smaller capacity being deployed. This potentially could force some companies not to bid for contracts, leading to increased costs for local authorities.

Other Relevant Comments

Q10: Do you have any other comments specifically related to the intention to legislate for seat belts to become a requirement within dedicated school transport contracts?

The final question in the consultation asked if respondents had any additional comments, with forty-five respondents providing such comments. Many of the comments reinforced views already expressed earlier on in the consultation and as

reported in this analysis. Generally comments overall reiterated strong support for the legislation, and many expressed surprise that it was not already law. Some other key themes included:

- Identifying who would be responsible for setting seat belt standards and also maintain seat belts when fitted;
- Agreeing on a standard definition of dedicated school bus;
- The requirement for guidance, and information campaigns on the changes.

Three individual respondents had concerns about who would have responsibility for the standards of seat belts to be fitted, and also ensuring that they were maintained. One of these individual respondents commented that:

“If there is no stipulation of mandatory technical specification in the new legislation then the Government will have missed a massive opportunity to make a positive contribution to the safety of school children.”(Individual)

A couple of respondents from a local authority area where seat belts are already fitted as standard flagged up that some of the seat belts were not being maintained. One individual respondents suggested that the proposed legislation should ensure that bus companies regularly check and maintain them.

A key issue mentioned in the responses from organisations was the definition of dedicated school buses. As a local authority respondent highlighted whatever the intention of the Scottish Government in introducing such legislation:

“...your terminology must have a clear legal definition of the type of service you intend to be covered by the new legislation. At present, we cannot tell what the impact will be in [name of local authority] based on the terminology used.” (Local Authority)

This belief was reiterated in a response from a professional organisation who stated that:

“There is a risk that loosely worded legislation will create or exacerbate a multi-tiered system where there is a perception that some pupils attending the same school enjoy greater levels of safety than others. The legislation also has the potential to create new areas of disputes between parents, schools and transport commissioners in respect of which ‘school buses’ do, and do not, fall within the scope of the new legislation.” (Professional Organisation)

In relation to the definition of dedicated school buses it was flagged up that in some areas almost all buses by which councils provide free travel to pupils are registered as local services too and so:

“...fare paying pupils and members of the public can use them, even though the service itself may only operate on schooldays with one morning and one afternoon journey. Our school buses, therefore, fall under both your definition of ‘dedicated school transport’ and ‘general public bus services’ (Local Authority)

Although it is an area of law reserved to the UK Parliament, a number of respondents mentioned that there needs to be clarity in the legislation about who would be legally responsible for the wearing of seat belts of children under the age of 14. It was questioned whether parents and carers, or bus drivers would be responsible. As a respondent from a professional organisation mentioned requiring younger children to wear seat belts could be problematic as they are likely to require assistance fitting them and that :

“Bus drivers should not be put in a situation that requires close body contact with children who are unable to use their seat belt independently.”
(Professional Association)

A number of individuals and organisations highlighted that if the legislation is introduced that specific guidance should be developed for authorities, parents, teachers, bus drivers and young people on the new requirements. It was suggested in a response from a professional organisation that this material could draw upon existing documentation produced by local authority areas where such seat belt requirements are already standard practice. One local authority respondent mentioned that a national road safety campaign aimed at children should be developed to encourage compliance.

Summary of responses to Question 10:

In general the majority of responses to who provided additional comments reiterated their support of the proposed legislation. Others highlighted possible practical issues in implementing it including who would have responsibility for children wearing seat belts on school buses, maintenance of seat belts of school buses, the definition of the term ‘dedicated school buses’, and raising awareness of any changes.

4. Next Steps

Transport Scotland would like to thank all those who took the time to respond to the consultation on this important matter. The feedback gathered will be invaluable in informing the next steps in the development of any legislation and ensuring that any measures are implemented in such a way which makes them as effective and successful as possible.

Annex A. List of Consultation Questions

1. Do you believe seat belts on dedicated/contracted school buses would make a useful contribution to road safety?

- Yes – a significant contribution
- Yes – a marginal contribution
- No contribution
- Don't know/Not sure

Please explain, providing evidence where appropriate:

2. Do you believe that having seat belts on dedicated/contracted school buses can help children formulate good habits in relation to seat belt-use more generally, for example when in cars?

- Yes
- No
- Don't Know/Not sure

Please explain, providing evidence where appropriate:

3. How do you think schools can play a role in helping to educate and support children in the wearing of seat belts (particularly on dedicated/contracted school buses)?

Please provide any evidence or examples you feel are appropriate:

4. How do you think parents and carers can play a supporting role in encouraging children to wear seat belts (particularly on dedicated/contracted school buses)?

Please provide any evidence or examples you feel are appropriate:

5. Do you have evidence or experience of any particularly effective ways to help ensure children wear seat belts when they are fitted in vehicles?

- Yes
- No

Please explain:

6. Do you foresee any young people with particular needs or protected characteristics – such as physical disability, religious belief, gender or learning difficulties – being disadvantaged by the proposals to legislate for seat belts in all dedicated/contracted school buses?

- Yes
- No
- Don't know/Not sure

Please explain:

7. To what extent do you agree or disagree that any forthcoming legislation proposed above should also apply to independent schools or grant-aided schools (which are not subject to the same duties as local authorities to provide transport for school pupils living outwith statutory walking distances)?

- Strongly agree
- Agree
- Neither Agree nor disagree
- Disagree
- Strongly disagree

Please explain:

8. Are you aware of any good practice/guidance or other measures that have successfully encouraged the wearing of seat belts provided on dedicated/contracted school buses by pupils of all ages, particularly if used by local authorities which already provide this?

- Yes
- No
- Don't know/Not sure

Please outline any examples as appropriate:

9. Do you foresee any funding or resource implications that would stem from the new legal requirement, particularly given the implementation timetable aimed at preventing contracts having to be broken?

- Yes
- No
- Don't know/Not sure

Please explain:

10. Do you have any other comments specifically related to the intention to legislate for seat belts to become a requirement within dedicated school transport contracts? Please explain

Annex B. Analysis of Consultation Questions

Contribution to Road Safety

Question 1. Do you believe seat belts on dedicated/contracted school buses would make a useful contribution to road safety?

Table 1: The extent of contribution by all responses.

	Total	Percentage
Yes - a significant contribution	65	84.22%
Yes - a marginal contribution	9	11.69%
Not Answered	2	0%
No contribution	1	1.29%
Don't know/Not sure	2	2.59%

Table 2: The extent of contribution by individuals.

	Total	Percentage
Yes - a significant contribution	54	84.22%
Yes - a marginal contribution	3	1.69%
Not Answered	1	1.69%
No contribution	1	1.69%
Don't know/Not sure	0	0%

Table 3: The extent of contribution by organisations.

	Total	Percentage
Yes - a significant contribution	11	61.11%
Yes - a marginal contribution	6	33.33%
Not Answered	2	0%
No contribution	0	0%
Don't know/Not sure	1	5.55%

Role of Proposal in Forming Good Habits

Question 2. Do you believe that having seat belts on dedicated/contracted school buses can help children formulate good habits in relation to seat belt-use more generally, for example in cars?

Table 4: Belief that dedicated/contracted school buses can help children formulate good habits by all responses.

	Total	Percentage
Yes	69	89.61%
No	2	2.59%
Not Answered	2	2.53%
Don't know/Not sure	6	7.59%

Table 5: Belief that dedicated/contracted school buses can help children formulate good habits by individuals.

	Total	Percentage
Yes	56	94.92%
No	1	1.69%
Not Answered	0	0%
Don't know/Not sure	2	3.39%

Table 6: Belief that dedicated/contracted school buses can help children formulate good habits by organisations.

	Total	Percentage
Yes	13	72.22%
No	1	5.55%
Not Answered	2	10.00%
Don't know/Not sure	4	20.00%

Effective Strategies to Encourage Seat belt Use

Question 5: Do you have evidence or experience of any particularly effective ways to help ensure children wear belts when they are fitted in vehicles?

Table 7: All respondents who had evidence or experience of any particularly effective ways to help ensure children wear belts when they are fitted in vehicles

	Total	Percentage
Yes	34	43.04%
No	40	50.63%
Not Answered	5	6.33%

Table 8: Individuals who had evidence or experience of any particularly effective ways to help ensure children wear belts when they are fitted in vehicles

	Total	Percentage
Yes	29	49.15
No	27	45.76
Not Answered	3	5.08

Table 9: Organisations who had evidence or experience of any particularly effective ways to help ensure children wear belts when they are fitted in vehicles

	Total	Percentage
Yes	5	25%
No	13	65%
Not Answered	2	10%

Impact to young people with particular needs or protect characteristics

Question 6. Do you foresee any young people with particular needs or protected characteristics - such as physical disability, religious belief, gender or learning difficulties - being disadvantaged by the proposals to legislate for seat belts in all contracted school buses?

Table 10: All respondents who foresee young people being disadvantaged by the proposed legislation.

	Total	Percentage
Yes	11	14.29%
No	55	71.43%
Not Answered	11	13.92%
Don't know/Not sure	2	2.53%

Table 11: Individuals who foresee young people being disadvantaged by the proposed legislation.

	Total	Percentage
Yes	7	11.86%
No	44	74.58%
Not Answered	8	13.56%
Don't know/Not sure	0	0%

Table 12: Organisations who foresee young people being disadvantaged by the proposed legislation.

	Total	Percentage
Yes	4	22.22%
No	11	61.11%
Not Answered	2	10.00%
Don't know/Not sure	3	15.00%

Extension of proposal to Independent or Grant-aided Schools

Question 7: To what extent do you agree or disagree that any forthcoming legislation proposed should also apply to independent schools or grant-aided schools (which are not subject to the same duties as local authorities to provide transport for school pupils living out with statutory walking distances)?

Table 13: All respondents who agree that forthcoming legislation should apply to independent and grant-aided schools.

	Total	Percentage
Strongly agree	63	81.82%
Agree	9	11.69%
Neither agree nor disagree	3	3.89%
Disagree	2	2.59%
Strongly disagree	0	0%
Not Answered	2	0%

Table 14: Individuals who agree that forthcoming legislation should apply to independent and grant-aided schools.

	Total	Percentage
Strongly agree	49	83.05%
Agree	5	8.47%
Neither agree nor disagree	3	5.08%
Disagree	2	3.39%
Strongly disagree	0	0%
Not Answered	0	0%

Table 15: Organisations who agree that forthcoming legislation should apply to independent and grant-aided schools.

	Total	Percentage
Strongly agree	14	77.78%
Agree	4	22.22%
Neither agree nor disagree	0	0%
Disagree	0	0%
Strongly disagree	0	0%
Not Answered	2	0%

Good Practise and Guidance

Question 8: Are you aware of any good practice/guidance or other measures that have successfully encouraged the wearing of seat belts provided on school buses by pupils of all ages?

Table 16: Awareness of good practice/guidance by all respondents.

	Total	Percentage
Yes	12	15.19%
No	41	51.90%
Not Answered	4	27.85%
Don't know/Not sure	22	5.06%

Table 17: Awareness of good practice/guidance by individuals.

	Total	Percentage
Yes	9	15.25%
No	35	59.32%
Not Answered	14	23.73%
Don't know/Not sure	1	1.69%

Table 18: Awareness of good practise/guidance by organisations.

	Total	Percentage
Yes	3	16.67%
No	6	33.33%
Not Answered	3	15.00%
Don't know/Not sure	8	40.00%

Financial and Resource Implications

Question 9: Do you foresee any funding or resource implications that would stem from the new legal requirement, particularly given the implementation timetable aimed at preventing contracts having to be broken?

Table 19: All respondents who foresee funding or resource implications.

	Total	Percentage
Yes	8	10.13%
No	3	3.79%
Not Answered	5	6.33%
Don't know/Not sure	63	79.75%

Table 20: Individuals who foresee funding or resource implications.

	Total	Percentage
Yes	2	3.39%
No	1	1.69%
Not Answered	2	3.39%
Don't know/Not sure	54	91.53%

Table 21: Organisations who foresee funding or resource implications.

	Total	Percentage
Yes	6	30.0%
No	2	10.00%
Not Answered	3	15.00%
Don't know/Not sure	9	45.00%



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ISBN 978-1-909948-80-8

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Published by Transport Scotland, August 2016

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