



**TRANSPORT
SCOTLAND**
CÒMHDHAIL ALBA

The costs and benefits of extending local Concessionary Travel Schemes to community bus services

**A Report in terms of Section 49 of the
Transport (Scotland) Act 2019**

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Introduction

Transport Scotland Act 2019

Part 5 of the Transport (Scotland) Act 2019 (“the 2019 Act”) deals with travel concession schemes and their application to community transport. Section 49 of the 2019 Act amends section 93 of the Transport Act 1985 to insert a requirement that the Scottish Ministers publish and lay a Report in Parliament, no later than twelve months after the Act received Royal Assent, setting out their assessment of the costs and benefits of extending travel concessions schemes, established under Section 93 of the Transport Act 1985, to community bus services (within the meaning of Section 22 (1) of the 1985 Act) and such other services as they consider appropriate.

In preparing the Report, the Act requires the Scottish Ministers to consult each local authority, each Regional Transport Partnership (RTP) and such persons as they consider to be representative of community transport users. Section 49 of the 2019 Act also requires the Report to be published and laid in Parliament no later than twelve months after the Act received Royal Assent, which was granted on 15 November 2019. This Report is being laid on 13 November 2020 to comply with the duty set down in section 49 of the 2019 Act.

The Transport Act 1985

Section 93 of the Transport Act 1985 (“the 1985 Act”), which will be amended by the 2019 Act, sets out the requirements under which a local authority can operate a concessionary travel scheme in its area or a joint scheme with other local authorities, a travel concession scheme made by a local authority for persons they specify as eligible within their area. These local concession schemes are set up and run by local authorities and the terms and conditions of such schemes are for local authorities to determine.

These schemes are distinct from and different to the Scottish Government’s National Concessionary Travel Schemes for Older and Disabled People and for Young People.

The Report

The Scottish Government has consulted each local authority and Regional Transport Partnership in Scotland on whether they operate a concessionary travel scheme in terms of section 93 of the 1985 Act. If a local scheme is being operated, respondents have been asked for information as to its extent and for their views on the costs and benefits of extending local concessionary travel schemes to community transport services.

The Community Transport Association (CTA) Scotland were also consulted as representatives of community transport users and providers.

Taking into account the requirement to assess such other transport services as Ministers consider appropriate, and in order to develop as full a picture as possible, community transport services have been interpreted for the purposes of this Report as public passenger transport services provided by not for profit organisations under both sections 19 and 22 of the Transport Act 1985.

This Report sets out the background to local concessionary travel schemes in Scotland, followed by an assessment of the costs and benefits of extending these to community transport, taking into account the evidence gathered on the benefits and costs to users and providers from the responses from those consulted. Copies of requests to consultees are at Annex A. A table setting out responses received is at Annex B.

Background

In publishing this Report, Ministers are discharging the duty at section 49 of the 2019 Act, albeit that section has not yet been commenced and the amendment to the 1985 Act has not yet been made.

Section 93 of the 1985 Act makes provision for a local authority (or two or more authorities acting jointly), if they so wish, to establish schemes providing travel concessions for journeys on public passenger transport services in their area. Such a scheme must set out the area of operation, the concessions to be provided and what constitutes eligible services and eligible persons.

The definition of public passenger transport is set out in section 63 (10) of the Act as follows – “all those services on which members of the public rely for getting from place to place, when not relying on private facilities of their own, including school transport but not services provided under permits under section 19 of this Act, other than services provided wholly or mainly to meet the needs of members of the public who are elderly or disabled; or excursions or tours.”

Prior to 2006 most local authorities in Scotland operated a local concessionary travel scheme, or a joint scheme with neighbouring authorities, providing a range of concessions on various transport modes, differing from area to area. Local authorities were provided with funding from the Scottish Government in respect of such schemes.

In April 2006, the Scottish Government introduced the National Concessionary Bus Travel Scheme for Older and Disabled People, providing free bus travel throughout Scotland for those aged sixty and over and for eligible disabled people. Agreement was reached with the Convention of Scottish Local Authorities that funds allocated to local authorities in respect of local bus concessionary travel schemes would be transferred to the National Scheme but local authorities would continue to receive funding through the local authority block grant to operate concessionary travel schemes on other modes of transport as they saw fit and this remains the case today.

Many local authorities continued to provide concessionary travel schemes such as rail, ferry, or subway schemes as appropriate to their area. However, in recent years many local authorities have discontinued their schemes or reduced concessions, mainly for budgetary considerations.

Community Bus Services

Community bus services are generally regarded as those operated by third sector organisations providing accessible, flexible transport options for those who are unable to access mainstream public transport due to mobility difficulties or limited transport provision where they live. Such services are operated by not for profit organisations using permits granted under section 19 and/or section 22 of the 1985 Act.

Section 22 services

For the purposes of section 49 of the 2019 Act, community bus services are defined as within the meaning of section 22(1) of the 1985 Act. In summary, section 22 services are:

- local community bus services
- provided by bodies concerned for the social and welfare needs of one or more communities
- operating on a not for profit basis
- using public service vehicles which can carry more than eight passengers
- available to the general public

Section 22 services include services that are flexibly routed and are registered with the Traffic Commissioner as local bus services. These services are eligible services under the National Concessionary Travel Scheme for Older and Disabled People. This means that passengers who are eligible under the national Scheme who travel on these services will already be eligible for free bus travel.

Section 19 services

Section 19 relates to permits granted in relation to the use of public service vehicles by educational and other bodies and are:

- services provided under and in accordance with a permit granted under that section
- provided by organisations concerned with education, religion, social welfare, recreation or other activities of benefit to the community
- operating for hire or reward but on a not for profit basis
- using public service vehicles which can carry more than eight passengers
- not for the general public

The majority of community transport services in Scotland operate under a section 19 permit. CTA Scotland's State of the Sector Report 2015¹ indicated that over 70% of survey respondents operated under a section 19 permit and around one quarter held section 22 permits.

As these services are not available to the general public, they cannot be registered as local services and as such are not eligible services under the National Concessionary Travel Scheme for Older and Disabled People. This means that passengers travelling on these services are not eligible for free bus travel under the National Scheme.

However, local authorities can, if they wish, include section 19 services which are provided wholly or mainly to meet the needs of elderly or disabled people in any local concessionary travel scheme they operate.

¹ https://ctauk.org/wp-content/uploads/2018/05/State-of-the-Sector-Scotland_2015.pdf

Assessment of the costs and benefits of extending local travel concession schemes to community bus services

The Scottish Ministers are required to set out their assessment of the costs and benefits of extending travel concessions schemes, established under section 93 of the 1985 Act, to community bus services (within the meaning of section 22(1) of the 1985 Act) and such other services as they consider appropriate.

As outlined above, concessionary travel schemes established under section 93 of the 1985 Act are local in nature and their terms and conditions are for the relevant Local Authorities to determine.

The National Concessionary Travel Scheme for Older and Disabled People already includes section 22 services, recognising the benefits that come from allowing more people who use community transport to access local services, reductions in health and social care costs and other benefits to local economies.

Information provided in response to our consultation is set out in Annex B. A summary of this information on section 93 schemes in operation and the views of local authorities, RTPs and CTA Scotland of the costs and benefits is set out below.

The Scottish Ministers' assessment is that community transport, including section 19 and section 22 services, can make a strong contribution to the wellbeing of individuals and communities who have limited access or difficulties using commercial public transport. However the potential value and cost of providing these services will depend critically on local needs and circumstances. The Scottish Ministers consider that local transport authorities are best placed to determine what services are needed by their communities, and the balance to be struck between public funding and user charges.

A number of local authorities and RTPs, and the Community Transport Association, noted that there would be advantages if section 19 services were to be included in the national concessionary travel schemes, while expressing concerns that the "no better, no worse off" reimbursement terms of the current older and disabled scheme would present financial difficulties for community transport providers and calling for participation to be optional and for more generous reimbursement terms to be provided for not for profit operators.

The Scottish Ministers are not of the view that the national schemes should be extended at this time to cover services other than local public transport. However they acknowledge concerns over the viability of public transport in rural areas, the potential impacts of the COVID pandemic on patronage and revenue and the contribution which can be made by not for profit operators and by demand responsive services, whether commercial, local authority funded or not for profit. The Scottish Government will be working with operators, including community transport providers, local authorities, RTPs and user groups to examine these issues in the light of the evolving impacts of the COVID epidemic.

Summary

There have been responses from 11 individual local authorities, from Strathclyde Partnership for Transport (representing 12 local authorities), from 3 other Regional Transport Partnerships and from the Community Transport Association Scotland as representatives of community transport users and providers.

Costs

“Cost of concession scheme in 2019-2020 was £107,494 including £25,870 for Dial-a-Bus. Concessions are discretionary and due to budget constraints have been put forward as a possible cut.” (Orkney Islands Council)

“Costs based on existing Section 19 and Section 22 provision across our region would be minimal in comparison to those spent on registered local bus journeys.” (Dumfries and Galloway Council)

“We provide concessionary travel reimbursement to organisations operating under section 19. Under normal circumstances this support, involving payments to five organisations, amounts to approximately £36k per annum.” (Aberdeenshire Council)

“SPT itself directly supports a number of community bus services or CT services through grant funding. This funding is specifically designed to improve access to services and facilities for communities in the west of Scotland. Over the last 5 years, SPT has provided grants in the region of £4m to nearly 20 CT operators. As regards consideration of costs, the mechanism for extending concessionary travel to CT operators needs to be understood. There would need to be a method for establishing the basis by which CT operators would be paid concessionary reimbursement. Currently, the majority of CT services do not operate a fares policy; therefore on what basis would CT operators be reimbursed, for example on shadow fares, if so, set at what level? Would the reimbursement formula mirror that of the National Concessionary Travel Scheme? There is an argument to suggest that such a proposal for concessionary reimbursement for CT would be better administered locally or regionally given much of the existing support for CT is done at this level already.” (Strathclyde Partnership for Transport)

Benefits

“the promotion of social inclusivity, providing public transport to areas that are beyond the core and branch network of the mainline bus services.” (Midlothian Council)

“Free travel is extremely beneficial particularly in tackling social inclusion and can reduce budgets linked to health, social care etc as travel can allow elderly and disabled people to live independently and can provide access to work, social and leisure activities. The benefits can outweigh the cost associated.” (Orkney Islands Council)

“The only benefit would be for DRT or dial a bus services, which were developed to sustain rural communities if funding for these services was available” (East Lothian Council)

“The benefits are two-fold in that such an extension would enable greater sustainability for Community Transport operators and greater flexibility as we move

to a more needs based travel model, particularly in rural areas, that will have a mixture of commercial, community and local authority providers.” (Dumfries and Galloway Council).

“We introduced...[concessionary travel reimbursement]...many years ago to enable dial-a-bus passengers, who are entitled to Scotland-wide Free Bus Travel, to travel free when travelling on scheduled shopping services operated under section 19. Such passengers are able to travel free on registered local bus services including section 22 community.” (Aberdeenshire Council)

“There are several Section 22 bus routes in our area, and they already participate in the Scotland-wide Free Travel scheme. This is an important benefit, which sustains these routes as virtually all of their passengers are entitled to free travel. We would certainly want to see this provision retained, and as it is already in place, do not expect there to be any further cost implications. Section 19 services vary widely in nature. We would certainly see a benefit in extending the scheme where a permit has been granted to provide a service to the population of a remote area where there is little or no public transport available, as these services fulfil a similar function to conventional public transport for the local residents. Other services would benefit from inclusion if they are largely provided for people who would be eligible for free travel, for example transport to day care centres. Recreational group travel, such as for sports clubs, would be less relevant for inclusion in the scheme. It may be that eligibility for inclusion could be linked to eligibility for the Bus Service Operators’ Grant.” (Highland Council)

“Extending concessionary travel may provide another income source and much needed additional financial support for community transport (CT) services, however we should be mindful of any unintended consequences for CT operators, for example reductions in other funding streams. It would therefore seem logical that any proposals need to consider how CT services are funded on the whole. CT services have an important role in helping achieve wider social and health benefits, in making the transport network more affordable and in widening people’s ability to local opportunities. Therefore, and subject to our comments here, SPT supports and welcomes...[an].. extension of the concessionary travel to include services operating under sections 19 and 22 of the Transport Act 1985.” (Strathclyde partnership for Transport)

Annex A - Letters to consultees

Bus Strategy and Concessions Policy Team
Bus, Accessibility & Active Travel

Area 2F North, Victoria Quay
Edinburgh EH6 6QQ
T: 0131 244 4458
Calum.webster@transport.gov.scot



ATCO Lead Officers

By e-mail

Your ref:

Our ref:

Date: 9 October
2020

Dear Sir/Madam

Transport (Scotland) Act 2019 – Costs and Benefits of Extending Travel Concessions to Community Bus Services

As you may be aware, Section 49 of the Transport (Scotland) Act 2019 amended the Transport Act 1985 to require the Scottish Ministers to, within one year of Royal Assent of the Act (15 November 2019), publish, and lay before the Scottish Parliament, a report setting out their assessment of the costs and benefits of extending travel concession schemes established under section 93 of the 1985 Act to community bus services (within the meaning of section 22(1) of the 1985 Act) and such other transport services they consider appropriate.

Schemes under section 93 are travel concession schemes made by local authorities for persons they specify as eligible within their area.

I am contacting you as section 93(7B) of the Transport Act 1985 and the Transport (Scotland) Act 2019 require the Scottish Ministers, in preparing the report, to consult each local authority, each regional transport partnership, and such persons as they consider to be representative of community transport users.

I would, therefore, appreciate your assistance with this piece of work and would be grateful if you could advise:-

1) Whether your authority provides a travel concession scheme under section 93 of the Transport Act 1985.

2) If so, does the scheme provide travel concessions to passengers travelling on any services operated under sections 22 and/or 19 of the Transport Act 1985? Please

provide details of any concessions provided on such services, for example, rate of concession and eligibility requirements as well as whether the services are operating under section 19 or section 22.

3) What you consider the costs and benefits would be of extending such a scheme to include section 19 or 22 services.

The published report will take account of the information you provide and is required to be laid before the Scottish Parliament by 15 November 2020.

I would, therefore, be grateful for your response please **by 30 October 2020**. Please reply to Ruth.Bishop@transport.gov.scot .

I appreciate this is a short timescale and apologise for not contacting you sooner on this matter. However, as is the case with the rest of the Scottish Government, Transport Scotland resources have been pivoted to respond to Covid-19 and the challenges that it presents. This has meant a significant reprioritisation of work within the organisation and has had an impact on a range of policy areas. The focus of Transport Scotland has been firmly on the challenges that are presented by Covid-19 and work was prioritised on current operations and live projects with longer term work being put on hold.

Yours sincerely

Calum Webster

Concessionary Travel and Community Transport Team Leader

Bus Strategy and Concessions Policy Team
Bus, Accessibility & Active Travel

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TRANSPORT
SCOTLAND
CÒMHDHAIL ALBA

Lead Officers
Regional Transport Partnerships

Your ref:

Our ref:

By e-mail

Date: 9 October
2020

Dear Lead Officer

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I would, therefore, appreciate your assistance with this piece of work and would be grateful if you could advise:-

- 1) Whether your authority provides a travel concession scheme under section 93 of the Transport Act 1985.
- 2) If so, does the scheme provide travel concessions to passengers travelling on any services operated under sections 22 and/or 19 of the Transport Act 1985? Please provide details of any concessions provided on such services, for example, rate of concession and eligibility requirements as well as whether the services are operating under section 19 or section 22.

3) What you consider the costs and benefits would be of extending such a scheme to include section 19 or 22 services.

The published report will take account of the information you provide and is required to be laid before the Scottish Parliament by 15 November 2020.

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Yours sincerely

Calum Webster

Concessionary Travel and Community Transport Team Leader

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TRANSPORT
SCOTLAND
CÒMHDHAIL ALBA

Ms Rachael Murphy
Director for Scotland
Community Transport Association
21 Walker Street
Edinburgh
EH3 7HX

Your ref:

Our ref:

Date: 9 October
2020

Dear Rachael

Transport (Scotland) Act 2019 – Costs and Benefits of Extending Travel Concessions to Community Bus Services

As you know, Section 49 of the Transport (Scotland) Act 2019 amended the Transport Act 1985 to require the Scottish Ministers to, within one year of Royal Assent of the Act (15 November 2019), publish, and lay before the Scottish Parliament, a report setting out their assessment of the costs and benefits of extending travel concession schemes established under section 93 of the 1985 Act to community bus services (within the meaning of section 22(1) of the 1985 Act) and such other transport services they consider appropriate.

Schemes under section 93 are travel concession schemes made by local authorities for persons they specify as eligible within their area.

I am contacting you as section 93(7B) of the Transport Act 1985 and the Transport (Scotland) Act 2019 require the Scottish Ministers, in preparing the report, to consult each local authority, each regional transport partnership, and such persons as they consider to be representative of community transport users.

I would, therefore, appreciate your assistance with this piece of work and would be grateful for your thoughts and comments on the inclusion of community transport services operating under section 22 and section 19 permits in local authority concessionary travel schemes.

Could you please also advise of any local authority travel schemes currently operating in Scotland that you are aware of that provide concessionary travel on section 19 and/or section 22 services, the level of concession and what the eligibility requirements are. Any information you can provide on the savings/benefits of concessionary travel for passengers using these services and the costs and benefits for community transport operators would be helpful.

If local authorities, who do not already provide these travel concessions, were to extend concessions to include section 22 and section 19 community transport services what would be the impacts for a) eligible users and b) community transport providers.

Does CTA have any statistical information showing the number of section 22 and section 19 services operating in Scotland?

The published report will take account of the information you provide and is required to be laid before the Scottish Parliament by 15 November 2020.

I would, therefore, be grateful for your response please **by 30 October 2020**. Please reply to Ruth.Bishop@transport.gov.scot .

I appreciate this is a short timescale and apologise for not contacting you sooner on this matter. However, as is the case with the rest of the Scottish Government, Transport Scotland resources have been pivoted to respond to Covid-19 and the challenges that it presents. This has meant a significant reprioritisation of work within the organisation and has had an impact on a range of policy areas. The focus of Transport Scotland has been firmly on the challenges that are presented by Covid-19 and work was prioritised on current operations and live projects with longer term work being put on hold.

Yours sincerely

Calum Webster

Concessionary Travel and Community Transport Team Leader

Annex B - Table of consultation responses

Respondent	Concession Scheme Y/N	Concessions provided	Summary of Costs and Benefits
Midlothian Council	No	None	Potential benefit would include the promotion of social inclusivity, providing public transport to areas that are beyond the core and branch network of the mainline bus services.
Orkney Islands Council	Yes	<p>1) For over 65s and disabled outer island residents - 12 free return Orkney Ferries trips per year to mainland and 12 free return trips on Loganair inter island air service for residents of North Ronaldsay and Papa Westray.</p> <p>2) Also 3 return trips a month for eligible Dial-a-Bus (section 19 services) members on mainland Orkney. Available to residents who are elderly, registered disabled and those who have no alternative means of travel.</p>	<p>1) Allows access to key services that cannot otherwise be accessed on the islands. These services are in effect bus services where there are no other options to travel to mainland Orkney.</p> <p>2) Provides door to door transport for social and leisure purposes.</p> <p>Benefits - Free travel is extremely beneficial particularly in tackling social inclusion and can reduce budgets linked to health, social care etc as travel can allow elderly and disabled people to live independently and can provide access to work, social and leisure activities. The benefits can outweigh the cost associated. In a remote rural island setting scheduled public bus services are limited and often not accessible to those with disabilities due to rurality or not accessible due to pick up/drop off distance.</p> <p>Costs - Cost of concession scheme in 2019-2020 was £107,494 including £25,870 for Dial-a-Bus. Concessions are discretionary and due to budget constraints have been put forward as a possible cut. Should the National scheme be extended to community bus services this would benefit the most vulnerable, elderly and disabled residents across the community. Currently the local scheme is limited to 3 return trips per month with additional travel often being too costly for regular users. As a means to pay for this, consideration could be given to increasing the National Scheme's eligibility age to 65</p>

Stirling Council	Yes	Stirling Council Taxi-card scheme and also for registered blind people on National Rail.	<p>Costs - Stirling Council is unable to identify what the financial costs of the extension of this scheme to section 19 or 22 services would be. We do not know if the reimbursement rate will be the same as that for local bus services currently in operation or, if separate reimbursement rate will be applicable to community transport schemes. This would obviously determine the absolute cost of the scheme.</p> <p>The main community transport operator in Stirling area is financially supported by Stirling Council to provide door to door transport for those passengers who have difficulty using mainstream public transport services. The operator is unable to participate in the current concession scheme and the revenue support from Stirling Council takes account of the revenue generated from passenger fares. Should the final reimbursement rate to the operator result in a reduction of fares revenue, Stirling Council would have to consider whether any additional financial support would be available to the operator to maintain the operation.</p> <p>In summary, while we believe that the absolute level of funding to the operator should not have a negative financial impact on Stirling Council's support, we are of the view that the negotiating procedures on the reimbursement rate should be similar to that between Transport Scotland and local bus operators.</p> <p>Benefits - We consider the benefits of extending the scheme to section 19 or 22 services would be: - extends the financial benefits of the free National Entitlement Scheme to community transport passengers who are unable to use mainstream bus services, supports the stability and possible extension of community transport provision to support mainstream local bus services and provide an alternative means of provision, generates demand for community transport for those passengers who require door to door transport and targets utilising spare capacity to reduce subsidy costs per passenger.</p>
East Lothian Council	No	East Lothian currently has no local bus services supplied under section 19 or section 22	The only benefit would be for DRT or dial a bus services, which were developed to sustain rural communities if funding for these services was available.

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Angus Council	No	Not applicable	Angus do not operate any local travel concession schemes and would be unlikely to explore this option.
Aberdeenshire Council	Yes	<p>Aberdeenshire Council supports the following concessionary travel initiatives but it is our view that only the TaxiCard Scheme falls under section 93 of the Transport Act 1985</p> <ul style="list-style-type: none"> • Aberdeenshire TaxiCard Scheme – offers discounted taxi and rail travel for older and disabled residents. • U21 Mega Discount Card – offers discounted bus fares for young people aged 16 to 20 on selected bus routes. • Scottish Blind Persons Travel Scheme – provides free rail travel in Scotland. • Community Transport concessionary travel reimbursement – enables older and disabled community transport passengers to travel free on Section 19 minibus dial-a-bus shopper services. 	<p>We provide concessionary travel reimbursement to organisations operating under section 19. Under normal circumstances this support, involving payments to five organisations, amounts to approximately £36k per annum. We introduced these payments many years ago to enable dial-a-bus passengers, who are entitled to Scotland-wide Free Bus Travel, to travel free when travelling on scheduled shopping services operated under section 19. Such passengers are able to travel free on registered local bus services including section 22 community</p>
Argyll and Bute Council	Part of scheme operated by Strathclyde	Section 22	<p>This is administered for us by Strathclyde Partnership for Transport (SPT), and we come under the Strathclyde Concessionary Scheme Area.</p> <p>There is only one Section 22 service within Argyll and Bute (with the exception of Helensburgh and Lomond). This service does take</p>

	Partnership for Transport		<p>concessionary fares. Within Helensburgh and Lomond, Argyll and Bute Council only provides dedicated school transport. Any local bus services, community transport under Section 19 or 22 permits, are administered by SPT, and they would be best suited to advise on concessionary reimbursement of Section 19 and 22 schemes.</p> <p>In the bulk of Argyll and Bute, Section 22 services are incredibly limited. There is little interest in local community transport groups in operating Section 22 services, however there are a range of small vehicle and minibus operations under Section 19 permits. Extending the scheme to Section 19 permit operations would allow some of the most isolated to get better use – and sometimes simply to actually use – of their concessionary bus pass.</p> <p>We do not have the same competition issues that have resulted in legal scrutiny recently, and pretty much all of our community transport groups are small, local, and meet a specific local need, often providing transport that will never be met by the supported and limited commercial bus network. This can come in the form of providing the “last mile” of transport for those with mobility issues, and providing the only transport service to isolated areas.</p> <p>There are a few examples already of Section 19 providers linking in to the established local bus network. Any extension of the concessionary fares scheme to include these outfits would only be of benefit to the local community, and would not impinge on the current bus service network.</p>
Comhairle Nan Eilean Siar	No	<p>There are no bus travel concession schemes operating in the Western Isles under section 93 of the Transport Act 1985. The only enhancement to basic NEC services are four ferry vouchers for single journeys per year on ferries between the Islands and the</p>	<p>Comhairle nan Eilean Siar support any move to provide a concession scheme for section 19 and 22 operators and users but passenger use is likely to be so low that the re-imbursement value will not encourage Community Interest groups to set up any new services. A fairer way to encourage growth in these services is if Scottish Government were to consider a higher rate of re-imbursement in all remote rural areas including areas that currently have a Registered Local Bus Service. The reduction in the percentage reimbursement rates on concessionary fare</p>

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		<p>mainland for Over 60, Disabled and 16 to 18 year olds.</p> <p>There are currently no services operating under section 22. No services operating under section 19 that the Comhairle are aware of currently offer any travel concession scheme. Details on current charging within our community groups is not readily available and I suspect varies greatly between groups.</p>	<p>income over the years has had a noticeable effect on rural operators desire to serve more remote areas.</p> <p>Comhairle nan Eilean Siar are working with two of the larger Community Transport groups within the Western Isles to try and expand current services in our most remote areas to a wider catchment group to then register and operate under section 22. One of the main costs for these services would be Electronic Ticket Machines and again the fares generated would never justify the outlay but ETMs would be so important to monitor these services. The benefits to potential customers either in isolated communities or isolated individuals within larger communities who could then rely on these lifeline services would be considerable.</p> <p>While the Community groups offer a good level of service to their members they are effectively a closed group membership scheme and we would want to encourage a travel concession to include a wider group of service users within the more remote communities especially to residents on lower income and the younger members.</p> <p>The Comhairle Transport Section would also support a travel concession scheme that would encourage use of the two Inter-Island ferries.</p>
Dumfries and Galloway Council and SWESTRANS (Regional Transport Partnership for Dumfries and Galloway)	No	Not applicable	<p>Costs based on existing S19 and S22 provision across our region would be minimal in comparison to those spent on registered local bus journeys. However, the benefits are two-fold in that such an extension would enable greater sustainability for Community Transport operators and greater flexibility as we move to a more needs based travel model, particularly in rural areas, that will have a mixture of commercial, community and local authority providers.</p>
Highland Council	Yes	<p>Scheme does not include community transport. We provide free travel on local ferries, and demand-responsive services operated under contract to the</p>	<p>There are several Section 22 bus routes in our area, and they already participate in the Scotland-wide Free Travel scheme. This is an important benefit, which sustains these routes as virtually all of their passengers are entitled to free travel. We would certainly want to see this provision</p>

		<p>Council by taxis or private hire cars. We also provide half fare travel on trains for people eligible for companion travel (and their companions).</p>	<p>retained, and as it is already in place, do not expect there to be any further cost implications.</p> <p>Section 19 services vary widely in nature. We would certainly see a benefit in extending the scheme where a permit has been granted to provide a service to the population of a remote area where there is little or no public transport available, as these services fulfil a similar function to conventional public transport for the local residents. Other services would benefit from inclusion if they are largely provided for people who would be eligible for free travel, for example transport to day care centres. Recreational group travel, such as for sports clubs, would be less relevant for inclusion in the scheme. It may be that eligibility for inclusion could be linked to eligibility for the Bus Service Operators' Grant.</p> <p>Due to the differences in types of operation and the data we receive from the Community Transport groups we support, it is difficult to estimate the cost of extending the scheme to Section 19 services. However, in the last year prior to Covid-19, four of our supported groups provided approximately 13,000 passenger trips on their Section 19 buses, totalling approximately 56,000 vehicle miles. A further nine, mostly smaller, groups also operate Section 19 buses, but at present we do not have passenger numbers available. We are following this up with them.</p> <p>In Highland, adult social care is provided by NHS Highland, and where transport is provided to day care centres, this is done by NHS. I do not have figures for this category of transport, but it is clearly a category which could benefit from concessionary travel provision.</p>
Perth and Kinross Council	No	Not applicable	<p>In Perth & Kinross Council we do not operate any Community Transport Services ourselves so we do not operate a concessionary transport scheme. Although we do sit on a Community Transport Forum which is chaired by one of our Community Transport providers and we have a strong membership in this group.</p>

Tactran (Regional Transport Partnership for Angus, Dundee, Perth and Kinross and Stirling)	No	Tactran confirm that Angus, Dundee, Perth and Kinross and Stirling Councils do not provide a travel concession scheme under section 93 of the Transport Act 1985	
SEStran (Regional Transport Partnership for East Lothian, Fife, Scottish Borders, City of Edinburgh, Clackmannanshire, Falkirk, Midlothian and West Lothian)	No	None	SEStran does not operate a concessionary travel scheme and is therefore not in a position to comment further.
HITRANS (Regional Transport Partnership for Highland, Moray, Orkney Islands, Western Isles and Argyll and Bute (excluding Helensburgh and Lomond areas)).	No	Not applicable	<p>Other bodies are better placed to estimate the cost of extending the National Entitlement Case Travel Concession to Community Bus Services. HITRANS would very much welcome this extension and have advocated in favour of this measure in past Scottish Parliamentary Committee Inquiry Evidence and in our evidence to the Audit Scotland review of the Scheme.</p> <p>An extension of the NEC scheme to include section 19 and 22 services would be a very positive step. It would bring greater fairness to the scheme as a number of rural residents have much more limited travel choices with a number of communities served primarily by the Community Transport Sector.</p> <p>To bring real fairness to the NEC scheme HITRANS would advocate the extension of the scheme to all community transport and increase the opportunity of island resident to have more frequent free ferry travel particularly where the ferry is the only public transport option available for travel to main local centres.</p>

			<p>Affordable fares are necessary to promote modal shift, and to provide mobility/social inclusion to people on low incomes. It seems unfair that in its current form the Scheme provides unlimited travel by bus on a basis that could amount to multiple trips per day in urban areas such as Glasgow, Edinburgh and Inverness while residents of rural areas have either no access to any means of public transport, or at best access in their area is provided by a not for profit voluntary community transport group, organisations which are eligible for reimbursement through the current scheme unless they operate as a registered service. HITRANS welcome the fact that this process recognises the inadequacies of public transport in rural areas and the opportunity to include Section 19 and 22 services in the scheme will reduce a contributing factor in this inequity. Transport Scotland statistics already show for example that the NEC is used over 9 times as often by Edinburgh resident cardholders than by Orcadian cardholders.</p> <p>If the scheme is to be extended to Section 19 and 22 services HITRANS would advocate for a higher reimbursement rate to be paid to these operators than the commercial sector recognising the social role these services play in a not for profit environment. There is little or no additional farebox revenue available to these operators.</p>
<p>Strathclyde Partnership for Transport (SPT) (12 member councils: Argyll and Bute Council, East Ayrshire Council, East Dunbartonshire Council, East Renfrewshire Council, Glasgow City Council,</p>	<p>Yes</p>	<p>SPT acts as administrator for the 'Strathclyde Concessionary Travel Scheme' ("the Scheme") on behalf of 12 member councils from whom funding for the Scheme is provided. The Scheme is founded on the provisions of the Transport Act 1985 and allows transport authorities to make concession transport schemes in certain circumstances e.g. for the elderly and disabled. The Scheme offers National Entitlement Cardholders</p>	<p>Whilst neither SPT or the Strathclyde Concessionary Travel Scheme provide concessions to passengers travelling on services operated under sections 22 and/or 19 of the Transport Act 1985, SPT itself directly supports a number of community bus services or CT services through grant funding. This funding is specifically designed improve access to services and facilities for communities in the west of Scotland. Over the last 5 years, SPT has provided grants in the region of £4m to nearly 20 CT operators.</p> <p>It is difficult to quantify the costs and benefits of extending travel concessions to include CT, however, it is important to stress that services provided by CT operators fulfil a vitally important role in meeting the needs of many communities, local groups, people with a disability as well as the general travelling public in areas where often either commercial, SPT</p>

<p>Inverclyde Council, North Ayrshire Council, North Lanarkshire Council, Renfrewshire Council, South Ayrshire Council, South Lanarkshire Council, West Dunbartonshire Council)</p>		<p>in Strathclyde concessions on rail, Glasgow Subway and certain named ferry routes within the Scheme area.</p> <p>The Strathclyde Scheme does not offer travel concessions on any bus services.</p>	<p>supported (subsidised) or other mainstream public transport services are not commercially viable. Significantly, research previously undertaken by Transport Scotland found that the overwhelming majority of Community Transport passengers who responded were concessionary pass holders.</p> <p>As regards consideration of costs, the mechanism for extending concessionary travel to CT operators needs to be understood. There would need to be a method for establishing the basis by which CT operators would be paid concessionary reimbursement. Currently, the majority of CT services do not operate a fares policy; therefore on what basis would CT operators be reimbursed, for example on shadow fares, if so, set at what level? Would the reimbursement formula mirror that of the National Concessionary Travel Scheme? There is an argument to suggest that such a proposal for concessionary reimbursement for CT would be better administered locally or regionally given much of the existing support for CT is done at this level already.</p> <p>Although CT services are run as ‘not for profit’, many of these services face cost pressures not dissimilar to those of the commercial bus market, including increasing running costs and the need to ensure continued investment in newer vehicle fleets. However, where the commercial bus market has the ability to increase fares in order to off-set some of these costs, CT operators are almost entirely reliant on receiving funding support from a range of sources including SPT. As budgets across many organisations and sectors are put under more pressure, the risk of reduced funding for vital CT services increases.</p> <p>Any proposals to extend concessionary travel to include CT should consider the technology required by operators to claim reimbursement e.g. ticket machines. There would be a cost associated with this and therefore consideration must be given towards supporting CT operators with any upfront setup costs.</p> <p>It is important to understand that CT provides a somewhat different function and often helps serve a separate user need to mainstream bus services. By the very nature of how CT services operate, they are more fragmented and require being flexible enough in order to meet the needs</p>
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			<p>of the communities they serve. We would caution against any proposals that may unintentionally make the provision of CT services more administratively difficult and a more arduous process for operators, for example requiring the registration of services and fixed route scheduling.</p> <p>Many CT operators have no ambition to extend their operation beyond its original intended function and are not keen to take on additional administrative burdens nor to move in the direction, as they may see it, either rightly or wrongly, of local bus operators. On this basis it may be that consideration should be given as to whether the extension of concessionary travel arrangements should be obligatory across the CT sector or whether there should be discretion on the part of operators as to whether they wish to participate.</p> <p>Furthermore, the covid-19 crisis has served to accelerate many of the challenges and issues that the commercial bus market has been facing over the last decade with patronage having declined by some 70 million passenger journeys in the west of Scotland during this period. The threat facing the bus industry as a whole is greater than it has ever been and whilst it is difficult to predict what the bus network will look like post-covid, there is a danger that many commercially run bus services may simply disappear.</p> <p>Unless some form of intervention is put in place to aid the recovery of the bus industry, including financial support and consideration given to existing governance arrangements, many communities may face losing bus services altogether. In such a scenario, it may be reasonable to think there could be a greater dependency for CT services across many communities, this in addition to the need for more socially necessary supported bus services which SPT already provide in many local areas. However, any proposal to extend concessionary travel to the CT sector should not be seen as the solution to wider market failure of the bus network.</p> <p>Extending concessionary travel may provide another income source and much needed additional financial support for CT services, however we should be mindful of any unintended consequences for CT operators, for</p>
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			<p>example reductions in other funding streams. It would therefore seem logical that any proposals need to consider how CT services are funded on the whole.</p> <p>CT services have an important role in helping achieve wider social and health benefits, in making the transport network more affordable and in widening people's ability to local opportunities. Therefore, and subject to our comments here, SPT supports and welcomes the extension of the concessionary travel to include services operating under sections 19 and 22 of the Transport Act 1985.</p>
Community Transport Association Scotland	Not applicable	Not applicable	<p>Extending the national concessionary scheme to cover community transport would improve the affordability and accessibility of transport for several user groups, thereby fulfilling the mission of the community transport sector and the aims of the National Transport Strategy to prioritise accessibility.</p> <p>That said, the scheme as it is currently applied to the commercial bus sector would be financially unsustainable for community transport, particularly when reserves have already been decimated by the Covid-19 pandemic. To overcome the barriers highlighted, we recommend:</p> <ul style="list-style-type: none"> - Applying the scheme at a rate of full reimbursement to cover the running costs of travel for concessionary fare passengers using community transport services, so that community transport operators aren't unduly disadvantaged. This must also account for removing seats to accommodate wheelchairs; - Providing training opportunities to enable operators to use the technology required; and - Running the scheme on a nationwide level to ensure that organisations who provide essential services, like health transport, which run beyond local authority boundaries, are not disadvantaged by the scheme.



**TRANSPORT
SCOTLAND**

CÒMHDHAIL ALBA

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