



**TRANSPORT  
SCOTLAND**  
CÒMHDHAIL ALBA

[transport.gov.scot](https://transport.gov.scot)

**Analysis of Responses to the  
Scottish Government Consultation  
on Free Bus Travel for People  
Resident in Scotland aged under 19**

## Contents

<b>Executive Summary</b> .....	<b>1</b>
<b>Introduction</b> .....	<b>5</b>
Background .....	5
Consultation Process .....	5
Respondent Numbers and Profiles .....	6
Analysis of Responses .....	7
Caveats and Reporting Conventions .....	8
<b>Increased Opportunities and Reduced Inequalities</b> .....	<b>10</b>
Improving Access .....	10
Removing Cost Barriers.....	11
Supporting Safe and Independent Travel .....	13
Supporting Health and Wellbeing .....	13
Climate Benefits.....	14
Perceived Inequalities.....	15
Perceived Disadvantages .....	17
<b>Delivery Options</b> .....	<b>23</b>
Support for Smart Cards .....	23
Arguments Against Smart Cards .....	27
Approvals for Applications .....	29
Appropriate Approval Age.....	32
<b>Potential Impacts</b> .....	<b>32</b>
Impacts on Particular Groups .....	33
Impacts on Organisations and Businesses .....	38
Other Comments .....	43
<b>Summary and Conclusion</b> .....	<b>47</b>
Main Findings .....	47
Impact Findings .....	48
Cross-Cutting Themes .....	48
Conclusion .....	49

## Executive Summary

### Background

The Scottish Government launched a consultation to inform development of a new statutory national concessionary scheme providing free bus travel for people resident in Scotland aged under 19. Views were gathered on the proposed arrangements for the scheme, including options on how it should operate and the potential implications it may have, both positive and negative, for children and young people and other key stakeholders.

The consultation opened on 26 October 2020 and closed on 7 December 2020. An independent analysis of consultation responses was commissioned, and this report provides the findings from that analysis.

### Respondent Profiles

A total of 3075 responses were received, including 2984 (97%) from individuals and 91 (3%) from organisations. Just under a fifth of respondents (19%) indicated that they were under 19 years old, more than half (55%) indicated that they were the parent/carer of someone under 19 years old and a smaller number (14%) indicated that they worked or volunteered with people aged under 19 (for example, as a teacher, educator or social worker). Among the organisations that took part, there was a broad range of interests represented, including local authorities, Regional Transport Partnerships, bus operators and community transport providers.

The majority of responses were submitted via Citizen Space, the Scottish Government's online consultation platform.

### Perceived Benefits

There was overwhelming agreement that the proposal would contribute towards objectives to increase opportunities and reduce inequalities for children and young people, with 91% of all respondents agreeing that it would. Dominant views included that the scheme would improve access to both employment and education, contributing to equality of opportunity and allowing young people to make training and education choices based on preference and skills rather than transport affordability. Improved access to social, recreational and cultural opportunities was also a feature of responses, although to a lesser degree.

The scheme was also very much welcomed on cost grounds, especially for families on low incomes or living in areas of deprivation, as well as single parent households and families without access to private vehicles. Removing fares for children would make whole family recreational experiences more affordable, again removing inequality of opportunity due to poverty.

Other perceived benefits that featured strongly included those linked to personal safety (i.e. providing a secure way for all children and young people to travel) and giving them a sense of independence and confidence to travel alone. Health and wellbeing benefits (both physical and mental health) and the associated climate benefits of encouraging young people away from cars and onto public transport were also recognised, but to a lesser extent.

## Perceived Disadvantages

While most respondents (72%) felt that there were no disadvantages to introducing free bus travel for under 19s, there was some disparity between different groups of respondents in this regard. Just under half of organisations (46%) perceived that there may be disadvantages, and these were typically linked to costs of administering and delivering the scheme, as well as negative impacts on service provision if the level of reimbursement was not set appropriately. Protecting bus operator fare revenues was a central feature of many responses, as well as ensuring viability of services.

The main perceived disadvantages of the scheme raised by individuals related to costs to the public purse and the impact on government spending in other policy areas if money was diverted to free bus travel for under 19s.

Other potential negative impacts raised by organisations and individuals alike included risks that young people would demonstrate anti-social and disruptive behaviour on buses and at bus interchanges, as well as possible overcrowding and delays to existing services if there was high uptake of the scheme. There were also some concerns for children's and young people's safety if the scheme was abused and/or not sufficiently well monitored by parents and carers.

## Views on Delivery Options

The large majority of respondents (88%) supported the use of a smart card to establish eligibility for the scheme. The main perceived benefits of having such a card included that a consistent form of identification would mitigate any uncertainties around eligibility and would help to minimise fraud and inappropriate use of the scheme. Smart cards were also considered to potentially assist with understanding travel patterns of young people. The need for children's and young people's data to be stored securely and in line with data protection and GDPR requirements was, however, stressed by several respondents as a caveat to their support.

The main perceived limitation of having smart cards for the scheme was the bureaucracy and administrative burdens associated with the application and distribution process (including managing lost and replacement cards) and many stressed a need for an accessible application process, as well as an easy means of accessing replacement or updated cards. Other dominant reasons given for not supporting the card included that it should not be necessary for young children who are visibly under 19, that children and young people were highly likely to lose or misplace cards and should not be expected to bear the burden of responsibility for looking after a card and that young people should be able to use existing forms of ID to travel, rather than the introduction of another new card which may present a barrier to some families.

Indeed, there were mixed views on whether the card should be a new standalone eligibility card or whether the existing Young Scot National Entitlement Card (NEC) for 11-26-year-olds should be used as the default. Digital solutions, including mobile/app-based alternatives were also widely encouraged for young people who may be more willing/prefer to use digital rather than physical tickets. This would also be more environmentally friendly, however, may not be accessible to all.

There was strong support for parental/guardian approval of travel card applications with just under two thirds (61%) supporting the proposal. This would help parents to maintain oversight of their children's actions in general, as well as adding a layer of security to the process, ensuring parents are involved in decision making around children's movements (especially younger children).

While a reasonable proportion (37%) did not support such a need for parental/carer approval, several of these did not agree with the scheme overall, rather than objecting specifically to the need for approval. Others who said 'no' also offered caveated support, rather than disagreeing with the principle entirely. Young people also accounted for almost a quarter of those who did not agree with this proposal with views including the need for young people to be independent, the need to remove/minimise excessive parental controls and children being perceived to have the right to automatically access the scheme.

When asked specifically at what age parental/guardian approval should be required, around a third of respondents felt that approval should only be required for those of primary age, and over half suggested approval should be required up to the age of 16 (or the end of compulsory secondary education). Young people were more likely to favour a younger cut off for the approval age compared to other respondents.

## Possible Impacts

Most respondents indicated that they saw no negative impacts resulting from the free travel pass scheme for different groups of young people, including those with protected characteristics.

The need for the scheme to be accessible to all was stressed (including the process for applying for entitlement cards) to ensure that those with disabilities, those facing literacy barriers and those for whom English was not their first language could benefit equally. Support for some of the most vulnerable children and young people to help them access the scheme, including those living in poverty, was also urged.

Where negative impacts of the scheme were mentioned, these were seen as affecting mainly bus operators and local authorities. For bus companies, the need for fair and appropriate reimbursement rates was the main emerging theme, especially in rural areas where reimbursement may not benefit services to the same extent. Investment in infrastructure to support the scheme to ensure its long-term success and longevity was also urged. For local authorities, many felt there would be increases in administration and bureaucracy if they were responsible for overseeing the scheme as well as possible cost increases to local authorities needing to subsidise additional routes that are not commercially viable.

## Cross Cutting Themes

There were mixed views regarding the experiences of those living in rural and remote areas of the country, including island communities. Some felt that the scheme would increase opportunities to access education, work and recreational facilities for such young people (who typically incur higher travel costs due to the need to make multiple bus journeys/multi-modal journeys to access the larger towns and cities). Others questioned if the scheme would have the same impact in rural and remote areas compared to areas where service provision was more prevalent.

While the main issue for rural and remote areas was concern around service levels, the more nuanced issue for island communities was that free ferry travel was considered essential to ensure parity between island dwelling young people and their mainland peers. Ensuring such equality was a government responsibility, it was stressed.

Safety was also a theme to run across responses to several different questions - both safety of children and young people as well as safety of other passengers and bus drivers. While a large proportion of respondents felt that the scheme would provide greater safety for children and young people, giving them greater flexibility of travel options when travelling alone or late at night, others felt that there were risks attached to letting children and young people travel without bounds. This included concerns about children and young people getting lost, being able to more easily run away, travelling unaccompanied and being targeted and the ability to travel too far from home (without adults knowing) and not being able to get home.

For bus drivers and other passengers, the main safety concerns were linked to potential overcrowding if there was a high uptake of the scheme, anti-social behaviour on buses that would need to be managed and the potential for children and young people to be abusive to drivers and other passengers. Mechanisms to penalise those who abuse the system should be in place, it was felt, including, for example, temporary suspension of bus travel rights through the scheme.

## Other Comments

Feedback to the consultation was largely positive, however, some indicated that they would like to see even wider access and flexibility for the scheme. A multi-modal ticketing system/scheme was encouraged (i.e. allowing travel on buses as well as trains, trams and ferries) and raising the age of eligibility to 25, to include all those in full time education, apprenticeships or volunteering work may make the scheme even more equitable and increase opportunities for even more young people. In contrast, a minority raised concerns throughout the consultation regarding likely increased costs to the public purse, with many questioning if and how the Scottish Government could afford such a scheme. Concerns about potential increases in fares for paying customers to help subsidise the scheme also featured as a general concern, as well as the need to explore further how the COVID-19 pandemic may impact on delivery and safety of the scheme, both short and long term.

## Conclusion

There was clear support for the proposal to introduce a concessionary travel scheme for under 19s, and this was evidenced among all main stakeholder groups. Equality of opportunity was the main perceived benefit, removing travel costs as a barrier to accessing social, educational, recreational and employment facilities. The main concerns focussed around the need to ensure that children and young people use the scheme responsibly, that they are protected as vulnerable bus users and that no undue administrative, enforcement or cost burdens are placed on local authorities and bus operators if the scheme is introduced. While the impact on other passengers, including potential for overcrowding and rising fares for those who do pay was also evident, the majority viewed that this was outweighed by the potential benefits to children, young people and their families.

## Introduction

### Background

The Scottish Government intends to launch a new statutory national concessionary scheme providing free bus travel for people resident in Scotland aged under 19. To inform development of the new scheme, a consultation was launched to gather public and other stakeholder views on the proposed arrangements for the scheme, including options on how it should operate and the potential implications it may have, both positive and negative, for children, young people and others.

The consultation opened on 26 October 2020 and closed on 7 December 2020.

An independent analysis of consultation responses was commissioned, and this report provides the findings from that analysis.

### Consultation Process

Feedback on the proposals was gathered via a consultation questionnaire containing nine substantive questions (four with both open and closed components). Questions focused on:

- the extent to which extending national concessionary travel to include free travel for under 19s in Scotland would increase opportunities and reduce inequalities, as well as exploring any potential disadvantages of the scheme
- delivery options, including whether the scheme should operate with or without smart cards to evidence eligibility and the application process linked to gaining such cards
- potential implications of the scheme for individuals (including those with protected characteristics) as well as implications on the rights, wellbeing and safety of children and young people
- views on possible costs and burdens to bus companies, public bodies, third sector organisations and businesses arising from the proposals

The majority of responses were received via Citizen Space, the Scottish Government's online consultation platform, and were automatically collated into a database, downloadable to Excel. A small number submitted responses directly via email, which were uploaded to Citizen Space.

Engagement with internal and external stakeholders with expertise in children's issues was also undertaken between October and December 2020. This included engagement with young people themselves, through an online focus group session with members of the Scottish Youth Parliament and volunteers from the Young Scot Hive (aged 12-19). Engagement through the Children's Parliament included an online focus group with children age 8-12, and a semi-structured interview via videoconference with a 7-year-old child and their parent.

At the launch of the consultation, a number of children's and young people's organisations were also informed of the consultation and were offered conversations to share more information with the Scottish Government. This generated formal

responses from a number of these organisations, and additional conversations were held with Barnardo’s, Action for Children, Who Cares Scotland, and two local authorities who had undertaken similar free bus pilot programmes (Falkirk Look After Pass and Renfrewshire Through Care programmes). The impacts on children’s rights and wellbeing, informed by findings from this stakeholder engagement, is outlined in further detail in this policy’s Child Rights and Wellbeing Impact Assessment<sup>1</sup>.

The Scottish Government also posted information about the consultation on various social media platforms and this generated a large volume of comments and interest in the consultation. While social media feedback was not included in the analysis, the social media alerts will have acted as a prompt for some of the formal Citizen Space responses that were received and which were included in the analysis.

## **Respondent Numbers and Profiles**

A total of **3075** responses were received, **2984 (97%)** from individuals and **91 (3%)** from organisations.

	<b>Number</b>	<b>Percentage</b>
Individuals	2984	97%
Organisations	91	3%
<b>Total</b>	<b>3075</b>	<b>100%</b>

Table 1: Respondent numbers and profiles

Although representing only a small proportion of the overall sample, there was a broad range of interests represented among the organisations that responded. This included local authorities and other public bodies, Regional Transport Partnerships, bus operators and community transport providers, education establishments, access panels, and organisations in the third sector, including several that support children and young people, as well as environmental charities.

The Scottish Government actively encouraged responses from individuals who would be impacted by the proposals, including children and young people, their parents and carers, and people who work with children in a paid or voluntary capacity. All those who took part in the consultation were asked to complete a Respondent Information Form (RIF) which included questions about their status in this regard. The final sample included:

- 596 respondents (19%) who indicated that they were under 19 years old
- 1700 respondents (55%) who indicated that they were the parent/carer of someone under 19 years old
- 424 respondents (14%) who indicated that they worked or volunteered with people aged under 19 (for example, as a teacher, educator or social worker)

<sup>1</sup> Available on the Transport Scotland website: <https://www.transport.gov.scot/>



These categories were not mutually exclusive, and some indicated that they were young parents/carers (themselves aged under 19) and/or were parents/carers that also worked or volunteered with children and young people.

A question was also asked about bus use frequency (prior to the COVID-19 pandemic). Two thirds of respondents said that they travelled on either a regular (40%) or semi-regular (26%) basis.

Frequency	Number	Percentage
I regularly use buses (daily or weekly)	1236	40%
I sometimes use buses (for example, once a month)	790	26%
I very occasionally use buses (for example, once or twice a year)	751	25%
I never use buses	254	8%
No response	44	1%
<b>Total</b>	<b>3075</b>	<b>100%</b>

Table 2: Reported bus use frequency among respondents

When looking at bus use frequency by group, over half of young people (54%) who took part in the consultation said that they regularly used buses (daily or weekly) compared to 39% of parents/carers. Only 6% of young people and 8% of parents/carers said that they never used buses (prior to the pandemic).

## Analysis of Responses

All responses were read and logged into a database, and all were screened to ensure that they were appropriate/valid. No duplicates were identified (i.e. where both the substantive response and the individual/organisation making the submission were identical). Although some responses to individual questions were not appropriate/did not directly address the questions being asked, all feedback was analysed and is presented under the appropriate sections below.

Closed question responses were quantified and the number of respondents who agreed/disagreed with each proposal or question statement is reported below.

Comments given at each open question were examined and, where questions elicited a positive or negative response, they were categorised as such. The main reasons presented by respondents both for and against the content included in the consultation were reviewed, alongside specific examples or explanations, alternative suggestions, caveats to support and other related comments. Verbatim quotes were extracted in some cases to highlight the main themes that emerged. Only extracts where the respondent indicated that they were content for their response to be published were used and a decision was made to anonymise all responses as part of the reporting process.

## ***Caveats and Reporting Conventions***

In several cases, responses were submitted from the same email address/same named person but contained notably different content. In these cases, a decision was made not to create a composite response for the individual (which would usually be the preference for a consultation of this kind), as there is no way of knowing if the individuals were submitting responses on behalf of others (for example, one parent/carer/teacher/youth worker submitting two separate responses on behalf of different children). The number of individuals presented above may, therefore, be better interpreted as the number of unique responses that were received.

Similarly, multiple responses were received from some educational establishments, and these were all retained as they likely represented the views of different young people and staff based within those organisations. Where multiple responses came from within an educational establishment, these were treated as 'individual' rather than organisational responses.

It should also be noted that some organisations provided responses that were very similar in nature, indicating some degree of collaboration. This is perhaps inevitable given that some of the themes raised will be relevant to those working in a similar capacity but based in different parts of the country (for example, bus operators, local authorities and Regional Transport Partnerships). As each were submitted from different organisations these were counted as unique responses and included separately in the analysis.

Disaggregate analysis is presented throughout the report, where appropriate, based on whether respondents were replying as individuals or on behalf of organisations. In some cases, however, this was confounded because individual respondents were replying on a personal level but worked in a professional capacity either with young people or as part of the transport industry. For example, the views of bus drivers (who responded as individuals) were not significantly different from the official organisational responses of bus providers, in some cases. Similarly, individuals who responded but who worked with children and young people in a professional capacity sometimes offered views that were the same as those submitted formally on behalf of children's and young people's organisations.

A thematic analysis approach was taken for all qualitative data submitted, rather than attempting to quantify and attribute open-ended data to codes. As a guide, however, and to provide an indication of the strength of feelings expressed, where reference is made in the report to 'few' respondents, this typically relates to 20 or less respondents. The term 'several' refers to more than 20, but typically less than 50. Any views that were expressed by 'many' respondents (i.e. 50 or more) are highlighted throughout. It is important to stress that, although the overall numbers of respondents was large, a great number of these answered only the closed component of the consultation questions. While these numbers (i.e. <20, >20 and >50) may seem small as an overall proportion of the total number of responses received, they nonetheless represent a large proportion of the qualitative comments that were received. It should also be noted that some respondents gave feedback in response to some questions that was more relevant for inclusion at other parts of the

consultation, and so these numbers may reflect views given not only in response to specific questions, but across the board.

In contrast, some people opted not to answer closed questions, but did offer open-ended responses to the same question meaning that there was not always a direct correlation between the number of people who supported/did not support a particular statement and the number of people who gave a qualifying response. For fullness, all responses were included in the analysis, even where the closed component of the question had not been answered. In many cases, the views offered in support of a statement/proposal were the same as those offered against, meaning that it was not always possible to present a clear split between groups. For example, encouraging young people to use the bus for part of their journey alongside walking and cycling was seen as a potential benefit of the scheme, whereas others felt that the scheme would deter active travel by providing bus as a more attractive option. Any anomalies are reported below. There was also some possible misinterpretation of questions, which is also highlighted where relevant.

Finally, some respondents did not answer the set questions directly and instead offered more general views or opinions on the scheme, or on bus services in general. Again, these views were included (where relevant to the overall consultation) but sometimes this means that data that were provided in response to one question were presented under a different question heading. Others presented a core theme to their argument which they repeated in response to different questions and again, where appropriate, data were moved to the most appropriate area of the report to minimise repetition.

The remainder of this report presents findings from the analysis.

## Increased Opportunities and Reduced Inequalities

As part of the consultation, a specific question was asked about whether the scheme would help to contribute towards objectives to increase opportunities and reduce inequalities for children and young people, and a second question explored any perceived disadvantages of the scheme.

### Q1. Do you think extending national concessionary travel to include free bus travel for under 19s in Scotland will contribute towards our objectives to increase opportunities and reduce inequalities?

	Number	Percent
Yes	2790	91%
No	273	9%
No response	12	-
<b>Total</b>	<b>3075</b>	<b>100%</b>

Table 3: Respondent views on objectives to increase opportunities and reduce inequalities

There was overwhelming agreement that the proposal would contribute towards objectives to increase opportunities and reduce inequalities, with 91% of respondents who answered this question agreeing that it would. Just under 1 in 10 felt that it would not.

All organisations who provided a response to this question said ‘yes’.

When looking only at respondents who identified themselves as being under 19 years old, support was even greater than the average (i.e. 97% said ‘yes’). The same was true when looking only at respondents who identified themselves as parents/carers of someone aged under 19 (i.e. 96% said yes). Those working or volunteering with people under age 19 also showed strong support (91% said ‘yes’).

Those who provided least support were those who did not fall into any of the categories above. Among this group of individuals, only 72% of respondents felt that extending the scheme would contribute to the set objectives. As no personal data were given for these individuals, it is not possible to know what demographic these views represent. Of this group, however, 42% said that they were regular bus users, and the remainder were less frequent users.

## Improving Access

The majority of responses given by those who felt that the scheme **would** contribute to these objectives focussed on the improved access to both employment and education opportunities that the scheme would bring, removing cost of travel as an obstacle, especially for those in low (or no) income households.

Specific benefits linked to **education** included:

- enabling those aged 16+ from low-income households to access places of study, where cost may otherwise force them into the work place instead of pursuing further and higher education goals

- providing a cost-free option to those living in areas where there are no school buses/no free school transport provision, those not eligible for school bus travel (and who currently pay for travel to school, which is a significant family expense)
- allowing young people to access after school and/or extra-curricular clubs/activities (including those that are offered in other settings)

*“Travelling to an education setting should be free so all children and young adults have an equal chance to learn and flourish.” [Individual]*

Specific benefits linked to **employment and training** included:

- allowing more young people to access places of work in areas beyond their immediate area of residence
- facilitating access to interviews/reducing costs of finding a job (with young people most likely to be attending multiple interviews/appointments and incurring associated costs)
- making apprenticeships and volunteering more attractive to young people by removing travel cost barriers
- allowing employers to attract candidates from a wider catchment area
- that an increase in use of public transport may create more jobs in the transport industry, including in public transport operation (e.g. drivers, maintenance), manufacturing of buses, infrastructure construction and maintenance

Young people were seen by many to be less likely to have independent means of transport, be more likely to be in low-paid and/or insecure work, and also have lower levels of social security entitlements, meaning lower incomes and less ability to cover transport costs.

Many respondents also focussed on improved access to **social, recreational and cultural opportunities** that would be facilitated by the scheme, including increased opportunities to access facilities such as museums, parks, galleries, sports venues, and other essential community services. Such comments were made largely in relation to improved family access (i.e. that removing fares for children would make whole family recreational experiences/days out more affordable, meaning that only parents/carers would need to pay, where appropriate). The scheme would also help grandparents who qualify for the over 60s concessionary travel bus pass to take their grandchildren on buses while their parents/carers are working, etc.

A much smaller number commented that the scheme would provide a much-needed means of allowing children and young people to more easily and independently access any **medical/care/support services** that they required.

## Removing Cost Barriers

Several respondents indicated that they perceived bus fares to be very expensive, with costs of travel rising in recent years. The scheme was therefore very much welcomed on **cost grounds**, primarily because it would remove cost of travel for those on low or no incomes, including:

- families on low incomes or those with low disposable income, as well as single parent households and families without access to private vehicles (it should be noted that several lone parents/carers provided responses which highlighted the considerable difference that this scheme would make to their daily life, affording family access to social and recreational opportunities which was currently beyond their means)
- families where parents/carers may already own and use a bus pass to travel, making essential and non-essential journeys with children cost-free

Free bus travel would mean that families have more money to spend on essential items for daily living whilst also allowing children from deprived areas to access social opportunities that others have, it was felt. The scheme would also allow young people to save money (which would have otherwise been spent on travel) to help with their futures.

Several respondents commented that the scheme would be more effective at increasing opportunities and reducing inequalities compared to discount schemes that were already in operation, as it would have universal application and cover different travel purposes/afford flexibility that other schemes did not:

*“While bus operators do provide student priced tickets, this is still at cost to the student and may well be a deterrent to progressing into higher education. In addition, the current Young Scots scheme, while useful, only applies to single fares and in many cases does not provide a significant benefit, as Adult Day or Season passes are often more cost effective, but even these can still be cost prohibitive.” [Local Authority]*

Also linked to cost was the idea that some bus routes may be used more frequently/become more popular and this may generate greater investment in service and route improvements for those areas. However, there was also a call for greater investment in services at the national level, to go alongside the introduction of free travel for under 19s, to make sure it was viable (discussed more in response to later questions).

## **Enabling Rural and Remote Communities**

Apart from those on low incomes, the group that was seen as potentially benefiting the most from the scheme in terms of increased opportunities to access education, work and recreational facilities was those living in **rural and remote areas**. Comments were made (by a range of respondent groups) that the costs of public transport were notably high for those living in these areas, and having this scheme would help reduce inequalities since travel to amenities in these areas often required multiple bus journeys/multi-modal journeys to access the larger towns and cities:

*“Having this scheme would also help reduce the inequalities in living in rural areas of Scotland. Often in these areas multiple bus journey is the norm, if you want to access the larger towns and cities that have more amenities.” (Children’s and Young People’s Organisation)*

*“In rural areas many young people have lack of opportunity due to relatively high public transport costs. Those young people whose parents do not have cars, or whose parents work and or live in full poverty cannot take full advantage of the social, educational and other developmental opportunities that are available.” [Individual]*

Comments were, however, also made that the extent to which free bus travel would increase opportunities and reduce inequalities for young people would depend on not just the affordability of travel but also the availability of public transport services, and concerns about poor service provision in rural and remote areas would need to be addressed in parallel to maximise inclusiveness and effectiveness of the scheme (discussed more below). Specific issues were also raised in relation to young people living in island communities, who would not benefit to the same degree unless ferry travel was also made free (again, discussed more below).

## Supporting Safe and Independent Travel

While a specific question was asked later in the consultation regarding safety, many comments were also made in response to this question (unprompted) linked to **safety** such that free travel would:

- provide a safe way for all children and young people to travel (and give confidence to parents/carers that their children had a safe means of getting home from study, work or social occasions)
- take young people “off the streets” (where they may engage in anti-social behaviour) giving them opportunities to travel to places where they can engage in purposeful activity
- make roads more pedestrian friendly by potentially removing more cars from the roads/ potentially take inexperienced (and potentially dangerous) drivers off the road

Several respondents also commented that free bus travel would give children and young people a sense of **independence and confidence** to travel alone (and encourage young people to be more mobile *per se* with reduced reliance on parents/carers). Several respondents mentioned that access to travel was necessary and empowering, especially for older teenagers:

*“This would allow young people to access more leisure and work opportunities, experiences and contribute towards their self-confidence, individuality and freedom to become more independent.” [Individual]*

## Supporting Health and Wellbeing

Other frequently mentioned benefits of the scheme included those linked to **improved health and wellbeing**. The scheme would encourage children to walk/cycle as part of their journeys (e.g. to reach bus stops) and be more active which in turn would be better for health outcomes including tackling obesity and improving mental health, it was suggested. The scheme would also encourage less reliance on private cars, with associated environmental benefits:

*“The introduction of free bus travel for young people will also have a positive impact in promoting longer term use of public transport helping to reduce car use, reduce congestion, improve air quality and improve the quality of the places people live. Travel by public transport also encourages children to walk more and be more active which in turn is better for health outcomes including tackling obesity and improving mental health outcomes... this is also better for the environment, reduces accidents and cuts congestion.” [Local Authority]*

Having free bus travel was also seen as having the wider benefit of reducing loneliness and social isolation by enabling young people to maintain friendship groups and form new and broader social networks and relationships.

Other wellbeing benefits included that the scheme would allow some of the most vulnerable young people in society to access the appropriate care and support that they may need, for example, homeless or transient young people, those with physical/ mental health problems or addiction problems who need to reach support services/care providers and other vital appointments. The scheme would also improve access to youth work services *per se*, it was stressed.

Other issues linked to wellbeing were also mentioned including that the scheme would:

- demonstrate to children and young people that they are valued members of communities/society and are supported in the same way as those at the other end of the age spectrum i.e. over 60s
- remove family tensions brought about by young people placing financial and time demands on parents/carers to facilitate their travel
- open up bus travel for fun, especially for younger children who benefit educationally from bus journey experiences, i.e. the “thrill” of the bus ride.

## **Climate Benefits**

Although mentioned by fewer respondents, free travel was also welcomed on the basis of **climate benefits** and contributing towards better air quality and a greener future, including that it would:

- encourage bus use more generally and embed environmentally friendly travel habits in the younger generation
- reduce use of private vehicles among parents/carers transporting children to sites of education, employment, training and recreation (i.e. reduce less environmentally friendly alternatives) and therefore reduce congestion and cut emissions (although some supporters of the proposal also caveated that significantly increased bus use may lead to increased congestion and emissions over time):

*“We believe that free bus travel for under 19s may act as a positive way to support the public transport industry given that this would encourage travel to school, higher education and work by public transport at a young age which we would hope would continue beyond the age of 19 and overall assist with modal shift...” [Local Authority]*



Overall, the proposal was welcomed by the large majority on the grounds that it was progressive, would remove barriers to work, education and recreation thus reducing financial poverty as well as poverty of opportunity faced by the poorest and most isolated families.

## Perceived Inequalities

Among those who felt that the proposal **would not** increase opportunities and contribute to reduced inequalities, the main reason given was the proposal would be less useful for those living in areas with limited bus services, especially rural and remote areas (in direct contrast to those above who felt that it would help these same communities). Respondents (both individuals and organisations) suggested that free bus travel would be of greatest benefit to those living in urban areas with frequent services rather than being equitable across the country (and thus may potentially make things even more inequitable):

*“Rural areas have lost many bus services in recent years and therefore people in rural areas cannot take full advantage of a free scheme... These schemes give great advantages to populated areas but do [little/nothing] to help rural areas to the same extent.” [Individual]*

*“...free bus travel will be of little benefit to young people if their local services are reduced or cut. Many people who rely on local bus services but who are not eligible for free travel, including people on low incomes or who live in remote areas, will also be affected by any resultant reduction in services.” [Regional Transport Partnership]*

Several respondents noted that free travel alone would not solve the problem of many young people living in isolated areas and service availability, as well as frequency and reliability of services was key to ensuring that these young people could benefit from the scheme. Preventing inequalities in rural and remote areas would require concessionary travel to be extended to include other modes (e.g. trains and trams), and potentially also community and demand responsive transport, it was suggested.

*“...there is the potential for some unintended consequences arising from the scheme which might create some new transport inequalities. For example, in places where there is a limited or infrequent bus service or none at all, young people living in such areas would gain little or no benefit from the scheme... For areas where bus services are less frequent or are limited, which is more likely in rural localities, we would want to see some viable alternatives offered. With this in mind, we believe that community transport services should be recognised as part of the scheme.” [Academic Organisation]*

Specific comments were also made that free travel should extend to ferries to and from Scottish islands for young people living in island communities, as ferries often provide the equivalent of a bus service or are integral to journeys that start or finish with a bus. Without this, the scheme may be seen as discriminatory against island dwelling under 19s, it was suggested (a theme also discussed more below).

Spending money on increasing and improving bus service provision across the country was suggested as a higher priority among many:

*“It fails to tackle the issue of poor transport provision: bus companies will not increase their services - particularly evenings and weekends; nor will they integrate or give longer-term certainty regarding services. If increasing opportunities and reducing inequalities are so important, increase services and reduce fares for all.” [Individual]*

Others suggested that spending the money on concessionary travel for a broader demographic or different groups in the community would be more effective to reduce inequalities, for example, those on low or no incomes or living in deprivation regardless of age, and those working in caring professions e.g. NHS staff, care workers and carers.

A small number indicated that it would not reduce inequality on the basis that they perceived fare paying customers and tax payers would ultimately have to “foot the bill” for the scheme (with several questioning where the money would come from to fund the scheme):

*“If you intend to run the scheme on the same basis as the current concessionary scheme for the elderly, then all that will happen is an increase in fares for the dwindling group left who are not covered by a free pass, as has been evidenced by the above inflation fare increases of the last few years.” [Individual]*

Others commented that there was a lack of evidence that the change would contribute positively to the economy with some viewing that it would simply be an additional burden to the taxpayer with the main beneficiaries being bus companies.

A reasonable number also suggested that the money which would be spent on the scheme would be better invested in other policy areas (including raising education standards, improving health services and investing in improved infrastructure and service levels) especially at a time when they thought that the country had low reserves and was cutting other essential services. There were other more pressing priorities for the government to focus on which were more likely to increase opportunities and reduce inequalities, it was suggested.

Other less frequently offered views included that:

- the scheme should only apply to those aged under 16 and/or those in full time education/volunteering work up to age 25 (since many aged over 16 may be in full time employment and not require the financial support). Several comments were made that stipulating ‘under 19’ seemed quite arbitrary and decisions should factor in employment and education status, or be means tested, rather than a blanket approach being taken based on chronological age
- that the system alone would not remove barriers to bus use and increase opportunities since many young people viewed bus travel as slow and unreliable
- allowing young people to use buses for free would discourage them from making healthier travel options, such as walking and cycling

A few offered comments that young people were those most likely to demonstrate anti-social and disruptive behaviour on buses and at bus stops (a theme that was developed more in response to later questions). These respondents felt that encouraging young people onto buses could potentially be off-putting to other bus users (making bus travel intimidating and unenjoyable for others), as well as potentially necessitating more policing of bus services to respond to nuisance behaviours/keep services safe to other bus users and drivers. Young people may also contribute to overcrowding and delays in services running to time, it was felt, with some young people (often in large groups) travelling short distances for fun, rather than for legitimate travel needs (i.e. “hopping on and off buses”). A minority view was put forward that it could allow young people to travel too freely, and without parental consent, which could pose a risk/be of concern to parents/carers (discussed more below).

Finally, some comments were made that, while the scheme would increase opportunities, it would not reduce societal inequalities which were more widely embedded:

*“Where people are in genuine need I have no problem with concessionary travel. Inequalities are not reduced by giving those who have the means to pay freebies, all that does is increase their disposable cash.” [Individual]*

## Perceived Disadvantages

### 2. Do you think there are any disadvantages to introducing free bus travel for under 19s in Scotland?

	Number	Percent
Yes	839	27%
No	2214	72%
No response	22	1%
<b>Total</b>	<b>3075</b>	<b>100%</b>

Table 4: Respondent views on potential disadvantages of the scheme

Just under three quarters of respondents who answered this question (72%) felt that there were no disadvantages to introducing free bus travel for under 19s.

Most reiterated points made in response to the earlier question that the scheme would be beneficial at reducing poverty, improving access to education, work, recreation and health and wellbeing support, would increase autonomy and independence and that it would have health and environmental benefits for young people. They therefore felt the scheme was non-problematic.

Analysis by respondent type showed that 46% of organisations who answered this question said ‘yes’ (compared to 27% of individuals), and this was reflected in the main qualitative themes to emerge which focussed mainly on potentially negative consequences for bus operators, local authorities and others working in the transport industry.

Ensuring that bus operators were appropriately compensated and **protecting bus operator fare revenues** was a central feature of many responses, as well as **viability of services**:

*“Falling bus operator revenues can lead to withdrawals of services no longer considered viable placing greater pressure on already stretched [transport partnership] and local authority budgets to plug gaps left. While great effort goes into innovative solutions and flexible timetabling to make best use of supported service budget it is not always possible to replace lost services. There is little point in having a free bus pass if you don’t have a bus to get on.”* [Regional Transport Partnership]

Specifically, there were concerns about commercial services losing revenues/journeys becoming non-commercially viable and operators withdrawing them<sup>2</sup>, especially since the potential uptake of the scheme/likely additional footfall could not be accurately estimated:

*“Any increased financial burden placed on operators will traditionally lead to fare increases, frequency reductions, service removal or a combination of these measures. This is obviously not beneficial to bus passengers or the government objectives for greener travel choices. Without proper funding the scheme will potentially operate on a model that discourages passenger growth through modal shift, and with lower yield values per passenger bus operators will need to carry more passengers to retain current revenues.”* [Bus Operator]

Specifically, if the under 19s free travel scheme was not reimbursed at 100% of the standard fare then there was a risk of reduced revenue to Scottish public bus services and local authorities, it was felt:

*“In difficult economic times, a risk to reduced income through the fare box may reduce the viability of some services, with a consequent risk that the objectives of increasing opportunities and reducing inequalities, and impact on other groups including those with protected characteristics.”* [Local Authority]

A reimbursement model which allowed payments to be made throughout the financial year would assist operators, it was suggested.

Protecting marginal and rural bus routes was also seen as a priority which should be monitored alongside introduction of the scheme so that services that communities rely on are not jeopardised. The implementation of the scheme may have an unintended consequence on those services and/or journeys which operators feel are borderline in terms of commerciality, it was noted:

*“Should the implementation of the scheme result in these services or journeys being removed as they are no longer commercially viable this would reduce the availability of services for passengers. This is particularly significant in*

---

<sup>2</sup> The scheme would also potentially take away custom from the taxi and rail industries, it was felt, with disbenefits to the overall transport network/industry. This required further thought, it was felt.

*more rural areas where bus services are fewer and less frequent potentially increasing inequality.” [Local Authority]*

Comments were also made that the scheme would disadvantage young people living in rural areas unless such routes were protected:

*...due to the varied provision of services across Scotland this scheme will not address inequality or increase opportunity in areas where there is lower, or no, service provision which could lead to greater inequality across the country for young people depending on their geographic location.” [Bus Operator]*

The scheme for free bus travel for under 19s and other concessionary schemes would only be effective if there was a **suitable bus network** and services in place for those eligible to use it, it was stressed.

Comments were also made regarding the potential for increases to tender prices for local authorities if on-bus revenue reduces as a result of the level of reimbursement, as well as potential for **increased administrative demands** on public service staff/transport operators helping to administer the scheme/tender services:

*“...Government will need to consider in partnership with the industry how the introduction of the scheme will impact on bus service operation and provide suitable mitigation measures and funding to operators/Transport Authorities to enable the scheme to operate safely and effectively.” [Regional Transport Partnership]*

A risk assessment would be useful to help identify any potential unintended consequences of the scheme on both local authorities and local bus providers and this was also an area that should be monitored and reviewed closely going forward, it was felt.

**Prioritising safety and managing risk** was also a central feature of many responses (among both individuals and organisations) and was cited as something which would need to be carefully considered if the scheme was implemented. The two main concerns were:

- potential for **disruptive and anti-social behaviour on buses** caused by young people (making buses less attractive to other customers)
- risks of **young people putting themselves in danger** (especially vulnerable young people) as a result of being able to move freely around the country without parental consent or letting someone know

Several respondents highlighted that the scheme would increase potential for children and young people to get lost if making multiple connections and others felt that the scheme would facilitate young people running away from home (including making it easier for children to abscond from residential accommodation). There was also potential for young people with additional support needs to easily board/alight buses and place themselves in a risky situation without being questioned, it was felt. Suggestions were made that welfare checks should possibly be considered before travel cards are issued, and that the ticket destination could be attached to the

Young Scot Card/ID (in line with GDPR) to aid parents or police should a child go missing. Local or 'zoned' travel entitlement cards were also suggested as an alternative instead of cards that allow travel Scotland-wide. **Child protection concerns** were essential to build into any planning for the scheme, it was stressed.

Other safety issues that were mentioned by multiple respondents included:

- risks to young people and other passengers linked to overcrowding on buses and at bus stops, especially at peak times (including before and after school)
- risks to personal safety when travelling alone which may necessitate enhanced security/surveillance
- physical safety risks and potential intimidation of staff/bus drivers/other passengers from young people travelling unsupervised and displaying anti-social/confrontational behaviours (including those who are challenged regarding their eligibility to travel)
- potential for the scheme to be abused by some (i.e. fake identity cards, young people swapping cards, etc.)
- possible additional costs to the police of responding to increased incidents of nuisance behaviour on buses/being called to attend disputes around eligibility
- damage to buses caused by young people and potential for repairs to be left unattended as profit margins for bus companies diminish, putting passengers' safety at risk

Again, these comments regarding safety were unprompted and similar feedback in relation to safety was given in response to subsequent questions which explicitly promoted feedback on this issue.

A full risk assessment for the proposed scheme should be carried out, it was suggested, including consideration of safeguarding arrangements and any necessary safety training for staff:

*"We also recommend awareness and safeguarding training for bus drivers and bus company staff - it is imperative children and young people are supported as they use bus networks with kindness, patience and a focus on safety, e.g. if they forget or have lost their cards, they should be allowed to travel, if they catch the wrong bus and get confused, or if they have additional support needs, drivers and staff should be mindful of individual needs."*  
[Parent's Organisation]

A suggestion was also made that a new passenger code of conduct may be an appropriate measure, outlining young people's responsibilities and consequences if they do not adhere to the rules. Alternatively, offering free travel only between specified times e.g. immediately before and after school/work hours, or during the day only with some restrictions later at night may help to prevent anti-social behaviour among older young people.

The **main disadvantages cited by individuals** largely reflected comments made in response to the earlier question and focussed on **economic factors**, including:

- cost to the government/tax payers of supporting the scheme
- potential increased costs to fare paying customers to support the scheme

Again, some respondents felt that the money that would be spent on the scheme should instead be diverted to other areas of public spending/to pay for improvements to other public services (especially health, education and improving bus networks and rural bus services for the whole community). Importantly, however, while costs to the government/tax payer were mentioned by many as a possible disadvantage, several respondents nonetheless also noted that these would be outweighed by the benefits to young people.

**Overcrowding, capacity and reduced service quality for fare paying customers** was also cited frequently as a more general concern among individual respondents, with possible overcrowding due to increased numbers of young passengers, which was seen as unfair and reducing travel comfort for fare paying customers:

*“Bus services could be packed to heaving point and people of working age who do have to foot the bill for their fare will be paying for a service that other people don’t pay, but may be left standing on the bus or have to wait for a less busy bus, etc.” [Individual]*

This was seen as potentially most likely to occur before and after school hours, with the risk that many families would opt for their children to use the public bus rather than school buses or private transport, with potential to displace travel to work passengers:

*“It will encourage those of school age to use general public transport rather than use school busses. This will mean less available seats for general bus users especially at weekday peak commuting times.” [Individual]*

Many expressed concerns that the scheme **should not be seen as a replacement for home to school transport provision** and that school bus services need to be protected to ensure they are viable and that the scheme does not unduly affect school bus services by offering an unrealistic return to operators. This was in direct contrast to those who welcomed the scheme to complement existing school transport (outlined above).

Several respondents mentioned the risk that local education authorities may seek to make budgetary savings by attempting to transfer school passengers from contracted services onto local services, which would both exacerbate capacity concerns and add to cost constraints already faced by operators seeking to manage demand appropriately at peak times. Others felt that the impact of the scheme on school transport required further consideration, including impact on registered commercial services. Conditions for the operation and implementation of the free bus travel for under 19s scheme should be agreed with local authorities and Transport Partnerships to ensure there are no negative impacts on existing concessionary travel schemes and school transport services, it was noted.

There was some suggestion that bus companies should perhaps have options to refuse free travel on services at certain times/specific routes to prevent the use of public transport for non-essential travel at times when other people are using buses

for essential travel. Alternatively, it was suggested that fees should be charged at key times so as to minimise overcrowding caused by young people at times when other adults also needed access to key services (i.e. commuter hours).

It was also noted that, with the potential uptake in bus passenger numbers, coming from a different demographic with different needs, bus services and timetables would need to be re-examined and changed and invested in accordingly to meet the needs of young passengers. Increased bicycle storage on buses was also seen as something which may need to be considered with increased numbers of young people travelling, as well as storage for prams if more families opted to travel by bus as a result of the scheme.

The main other theme was potential for the scheme to **discourage active travel** choices among young people, especially for short journeys, i.e. walking and cycling, which would be counter to the Scottish Government's wider health and wellbeing aspirations:

Regular monitoring and review of the scheme was welcomed as a way of assessing effectiveness and determining if any unintended consequences arose.



## Delivery Options

To ensure that the scheme is as effective and accessible as possible, a number of delivery options were presented in the consultation, with three questions linked specifically to whether a smart card should be used to establish eligibility for the scheme, whether applications for such cards should need to be approved by a parent or guardian and, if so, at what age such approval should be required.

### 3. Should a smart card, such as the widely used Young Scot card, be used to establish eligibility for free bus access?

	Number	Percent
Yes	2703	88%
No	344	11%
No response	28	1%
<b>Total</b>	<b>3075</b>	<b>100%</b>

Table 5: Respondent views on smart card use

The large majority of respondents (88%) supported the use of a smart card to establish eligibility for the scheme.

When looking at specific groups, 90% of young people under 19 supported its use as well as 91% of parents/carers. There was less support among those working or volunteering with children and young people (81% said 'yes') and the least support came from those who did not fall into any of the categories above (78% said 'yes').

Only three organisations indicated that they did not think a smart card should be used, however, in two cases this was because they felt that apps, mobile or digital ticketing would be more appropriate (i.e. a physical smart card should not be used exclusively) and in one case it was indicated that not all children would have access to the Young Scot card (and so this would be unsuitable, if proposed).

### Support for Smart Cards

The main reasons given in support of a card were that:

- having a consistent form of identification would make things easier for bus drivers to quickly assess eligibility when young people board the bus and **mitigate any uncertainties around age eligibility**
- cards would help with analysing and **understanding travel patterns** and monitoring bus usage
- ID cards would help to **minimise fraud**
- it could potentially help to monitor individuals/**track children who go missing**
- having a card that is the same for all young people **removes stigma** that may be associated with using other forms of ID

- where the system is abused (e.g. young people causing disruption could have their **cards removed as a penalty**)

There was some blurring of responses between those who answered both ‘yes’ and ‘no’ to this question, with some supporters offering caveats to their support, similar to the views expressed by those who did not support a card system at all.

Respondents suggested that more information about the application process would have been welcomed to inform their response, and noted that an **accessible application process** would be necessary in order for the scheme to maximise reach and effectiveness. The application form would need to be child and young person friendly and ideally allow for independent completion for older young people. The form would also need to be made accessible for families and children where English is not their first language, as well as families facing literacy barriers.

Digital application forms were suggested, where children and young people are able to use their mobile phones, similar to the 16-25 Rail Card, and wide access to application forms was also encouraged:

*“I think a card system would definitely benefit. I think applying for a card needs to be made accessible - have application forms available in schools, colleges, universities, have online access as well as paper access. Paper copies should be in local libraries and community centers so people don't have to travel far to access this.” [Individual]*

Overall, any application and issuing processes needed to be simple, quick and secure, it was stressed. There would also need to be very clear guidelines and instruction on who had responsibility for administering the scheme, it was felt.

Suggestions were made that **schools could facilitate applications and administration** of cards for young children, as a means of ensuring that all those eligible receive the card (rather than relying on individual families/young people to apply). This would also remove any barriers among families who may lack access to computer/internet facilities if an online application process is used:

*“I think this should be done through the schools to ensure that all have access to the application. Some households don't have internet, or parental support to help with applications.” [Individual]*

It was noted that any system which relies solely on schools to distribute the passes may, however, exclude a large number of children and young people, e.g. children/young people who are home educated, those from travelling communities, those who are homeless, and those not in some form of full-time education or training. These groups may need additional support to access the travel pass:

*“Unemployed young people, young carers, care leavers, young people with invisible disabilities, young people with non-supportive adults in their lives, etc. may not have contact with agencies who can help them, as when they were at school and may fall out of this scheme. But actually, they are the ones who need it most.” [Individual]*

Respondents stressed that the scheme would also need to be **well advertised** to maximise uptake:

*“...to ensure smooth transition into the introduction of the scheme, we would encourage there to be a national awareness raising campaign so that all children and young people who are entitled could benefit from this support.”  
[Carer’s Organisation]*

A smooth and efficient mechanism for **accessing replacement cards** (with interim solutions) was also encouraged for cases where children or young people misplace, lose, or have their cards stolen. Some suggested that it would be helpful if young people could use an alternative form of ID if necessary (such as a student card), for example, if they lost or forgot to take their entitlement card with them for a specific journey.

**Driver discretion** was also encouraged for cases where young people forget their card but are clearly under 19 (to minimise risks of young people being rejected/disadvantaged):

*“Young people are, by nature, more likely to also forget to, or choose not to, carry their card at all times. As bus companies define under 16s as children, and children [are] a vulnerable group of passengers, they will not be in a position to refuse travel of any under 16 presenting without their scheme card, or to require payment of a fare before travel. As such any scheme must operate in a manner where ‘manual concession’ transactions are honoured by Transport Scotland and the acceptable number of these must be significantly higher than the guidance on the current Scottish National Entitlement Scheme.” [Bus Operator]*

Backup **digital cards and apps** were also widely supported for young people who may be more willing/prefer to use smartphones than physical tickets:

*“We would also urge the Scottish Government to consider an additional option of issuing the ‘card’ in the form of a phone app for those who wish it. This would overcome some of the issues with losing cards, cards being damaged, etcetera. Measures would need to be put in place to make sure the app was accessible and easy to use and did not require the most current models of phone for software compatibility (due to cost of phones) but we think this might be attractive to younger people.” [Third Sector Organisation]*

Digital solutions were also supported on the basis that they would be more cost effective and easier to manage, the main caveats being that not all children, young people and families would have access to smartphone technology, etc. In such cases, physical cards should be available as an alternative, it was suggested.

The **frequency of updating cards** was cited as a possible administrative challenge, especially if photographic ID was to be included (given that young people grow and their appearance may change quickly over time). Suggestions were made for annual renewals, or every two or five years, although the administrative burdens of this would need to be considered.

There were also some questions around whether children of primary school age would have sufficient understanding regarding the **responsibilities of having a high value card**, as well as logistical issues for young children who may be less likely to use wallets and purses to safely store their card. Similarly, provisions would

need to be made for those for whom using a card may present difficulty such as those with physical or learning disabilities or mental health problems, it was felt.

Some caveated their support for the cards insofar as they would not wish to see very **young children being able to travel alone**, and this was seen as a one of the main risks attached to a child-owned card (with suggestions that children under 11 should not be travelling alone, in particular).

There were mixed views on whether the card was welcomed or not as a means of **controlling children's movements**. Some felt that it could help parents to limit their child(ren)s use of the scheme, whereas others raised this as a potential welfare issue i.e. in cases of abuse or neglect, a smart card may be withheld from a child or young person as a form of control. In the latter scenarios, support was again raised for allowing alternative forms of ID, where necessary.

There were also mixed views on whether the card should be **integrated or standalone**. Where people interpreted the consultation to be proposing a new and separate smart card, some disagreed on the basis that the existing Young Scot card should be used instead (to reduce bureaucracy, administration and costs). The existing Young Scot card was encouraged to prove eligibility to travel on the basis that:

- Young Scot cards are already widely used and accepted and seemed to work well
- young people are already familiar with the card, and so there was less likely to be stigma attached (especially as the card is multi-purpose)
- the process for administering Young Scot cards via schools was seen as effective
- using a Young Scot card would reduce the need to carry multiple different cards
- if the existing Young Scot card was used, the system could potentially be introduced more quickly
- introducing a new card to the market was not practical or cost effective and combining it with existing infrastructure could reduce roll out costs

If the Young Scot card was used for determining eligibility, a digital equivalent should also still be provided, it was felt:

*“It would make sense to use a system that is already in place, such as the Young Scot card. This should also be made available as an app to make bus services even more accessible to young people and therefore more likely to be used.” [Bus User Organisation]*

Others promoted the development of a smart card that was similar to the Young Scot card but was separate from it, and stressed that this would be important for those who were unable/unlikely to apply for a Young Scot card due to various barriers (including refugees and asylum seekers, children in extremely rural environments and home educated children). Consideration was also needed about how to extend the scheme to younger children for whom a Young Scot card was currently not available (i.e. the eligibility criteria for the card is 11-25):

*“There is therefore a significant issue in that the card does not have penetration in the 5-11 age group, and that the upper age limit is higher than the proposed age group for the scheme. As such eligibility criteria for the Young Scot card would need to incorporate age 5-11 and the ITS chip would need to be able to be read by bus operator ETMs in a manner that automatically removed authorisation to travel under the scheme on the card holder’s 19th birthday.” [Bus Operator]*

Apart from the associated cost and administration challenges of extending the Young Scot card to cover a different age range, other issues included Young Scot cards taking a long time to access and replace. Indeed, a common response was that it was challenging to get a Young Scot card (with several people citing examples of not being able to access a card for their child despite repeated efforts). Not all those eligible for a Young Scot card choose to have one, it was stressed, and the Young Scot card was easily lost, based on experience. Using a Young Scot card for ID should, therefore, be avoided some felt and if a scheme was introduced it should be accompanied by a new, standalone card. Alternatively, greater efforts should be made in ensuring there is 100% take up of Young Scot cards.

Another common feature of responses was that the card could be **multi-functional** to help young people access other services such as banks, training, health services:

*“This type of ID could potentially be useful as another form of identification for other elements like applying for benefits, employment, and training opportunities. We have seen many young people struggle to provide a proof of ID for these entitlements, either due to cost or ability to obtain a driving licence/passport or their birth certificate.” [Children’s and Young People’s Organisation]*

Some respondents suggested having one card which would allow travel on different modes, e.g. something that would also be used for free ferry or train travel, and this was again seen as particularly important for those living in rural, remote and/or island communities.

The need for the application process and the storage of children’s and young people’s data to be **compliant with data protection and GDPR** requirements was also stressed by several respondents as a caveat to their support. Many respondents sought reassurance that children’s and young people’s data would not be used inappropriately for tracking or other purposes without consent, and queried if users would be safe if they could be tracked by unknown data holders/controllers.

Other less frequently made comments included the need to ensure that the cards used are environmentally friendly, e.g. made from recycled material and biodegradable, in order to meet wider policy objectives linked to climate change.

## **Arguments Against Smart Cards**

Most of those who **did not support a card** said that this was because they did not support the scheme at all (for the various reasons highlighted in response to earlier questions) and so rejected proposals in their entirety.

Other dominant reasons given for not supporting the card included that it should not be necessary for young children who are visibly under 19, that children and young people were highly likely to lose or misplace cards and should not be expected to bear the burden of responsibility for looking after a card and that young people should be able to use existing forms of ID to travel, rather than the introduction of another new card/introduce a new application process which would present a barrier to some families.

Again, several who said 'no' did not reject the idea that a form of ID was needed, but instead argued that a phone-based app or digital equivalent would be preferable (and remove the need to renew/replace lost cards as well as being more environmentally friendly).

Personal data collected as part of a smart card scheme may be abused/misused and access to the service should not be bundled together with consent for data collection, it was felt. Some parents/carers in particular were not happy for their child(ren)s data to be stored and accessed by others.

In line with earlier comments about different travel and transport needs of those living in different geographical communities, support was also put forward for a nationwide smart travel card scheme for young people, that works interchangeably across all transport systems.

Again, the application process was something which some viewed as being potentially off-putting with scope to marginalised some of the most vulnerable and isolated young people:

*"If smart cards are required, there must be effective measures in place to ensure widespread uptake and use of the card so that every child and young person in Scotland is able to access his or her entitlement." [Third Sector Organisation]*

Several respondents felt that the costs of administering a card-based scheme would be too high. Again, if introduced, some respondents stressed that the card/ticketing system would need to be as smart and automated as possible to minimise any additional burdens on bus operators, local authorities and other key delivery stakeholders. A specific card and processes like the current national bus concessionary scheme that make use of existing structures would seem the most appropriate, it was suggested.

Overall, those who supported the introduction of free travel for under 19s but did not support the introduction of a smart card to support it did so on the grounds of perceived bureaucracy, i.e. that having cards would add an additional level of cost and complexity that was not needed and would act as a barrier to uptake.

## Approvals for Applications

A specific question was asked in relation to the perceived appropriateness of setting an age below which access to the scheme would have to be authorised by parents or carers.

### 4. Should children under a certain age need to have their application for a travel card approved by a parent or guardian?

	Number	Percent
Yes	1876	61%
No	1141	37%
No Response	58	2%
<b>Total</b>	<b>3075</b>	<b>100%</b>

Table 6: Respondent views on application approvals

There was strong support for parental/guardian approval of travel card applications with just under two thirds (61%) supporting the proposal. There was, however, also a reasonable proportion who did not agree with this idea (37%). Among this latter group, however, several did not agree with the scheme overall, rather than objecting specifically to the notion of parental/carers approval. Others who said ‘no’ also offered caveated support, rather than disagreeing with this principle entirely (for example, that it would only be appropriate for younger children, rather than those aged over 16).

Only ten organisations (11%) did not agree that applications should be approved, and there was no common thread to the reasons given.

When looking at different groups of individual respondents, 44% of young people, 36% of parents/carers and 44% of those who work or volunteer with children and young people said ‘no’. Among those who did not fall into any of these categories, 37% said ‘no’.

Among respondents who thought that children under a certain age **should not** need to have their application for a travel card approved by a parent or guardian, the main reason was that it may act as a barrier to accessing the scheme, particularly for:

- vulnerable and disadvantaged children (including those living in abusive or chaotic households, those in care, and unaccompanied asylum seekers)
- young people who have left home
- those whose parents/guardians may not be able to give consent, either due to language barriers, difficulties with reading and writing, digital exclusion or a lack of digital literacy
- those whose parents may refuse or were too strict/controlling:

*“Some young people can be in controlled and abusive situations with their parents or guardians so I don’t think parental permission should be required to*

*access free travel. Free travel could help a young person become independent and get out of a bad situation.” [Individual]*

Young people generally stressed their right to independence and suggested that this arrangement would be too controlling.

Some felt there shouldn't be a need for young people to apply for the travel card, but rather it should be given automatically - again, it was suggested the cards could be automatically distributed via schools (similar to that system operated by the Young Scot initiative).

Similarly, several felt that the need for application and approval added unnecessary bureaucracy and was an inappropriate approach. If eligibility is based solely on being under 19 years of age, it was felt that proof of age would be more appropriate than an application and approval process. Several also felt that young children (e.g. under 12s) should not actually need an entitlement card, but rather receive automatic free travel, with cards only being necessary for those of secondary school age, by which time they would be old enough to apply themselves and not require parental approval:

*“What difference does it make who authorises it? It's free irrespective. So, all kids just gets cards posted out or updated. Then if parents don't want their kids to use the card, they can then bin it or just not use it.” [Individual]*

Several felt that parents would need to help young children to complete the application anyway, and would therefore necessarily be involved in the process, and so formal approval was not required. Conversely, it was felt that older children (typically those in secondary school) should be able to decide and apply for the travel pass themselves, not least because this would help to build independence and responsibility:

*“No, they are entitled as young adults to make certain decisions themselves.” [Individual]*

A few felt, however, that parents and guardians should be informed of the card and know that their child has been provided with one, even if they are not required to make or authorise the application.

Among those who said no, several did feel that there were perhaps some circumstances where parental approval may be sensible. This included instances where a child had an additional support need, or where they were younger (largely noted to be primary school age). It was also suggested that, if a decision was made that approval was necessary, the list of those able to approve, counter-sign or authorise should be widened, to include school/college staff, social workers, employers, carer services, GPs and other responsible adults who knew the young person and could confirm their age. This would help to protect some of the most vulnerable children living in troubled households.

Among those who thought that children under a certain age **should** need to have their application for a travel card approved by a parent or guardian, the main issues discussed included:



- parents maintaining responsibility for their children in general, and their wellbeing and safety specifically, including ensuring parents are involved in the decision making about when and where children can travel

*“Under 12s should have parents’ permission as it could be unsafe for them to travel alone.” [Individual]*

*“A parent or guardian must be aware that having the card gives their child the capacity to board a bus and travel for free and be a part of that decision and perhaps help ensure they know how to travel safely, respectfully and make the best use of it.” [Individual]*

*“To ensure that parents are aware that their child has access to public transport and parents/child discuss safety/boundaries on when/where they can travel.” [Individual]*

- that parental involvement was needed in the application process for data protection reasons, i.e. so they knew/could edit what information was being shared in the application process and for any potential ongoing monitoring
- providing parental awareness of the scheme, that their child has a travel pass and what that means, and knowing what their children are signing up for
- to allow the parent/carer and child/young person to discuss the scheme, any restrictions the parents wished to implement (e.g. times, distances, routes, etc.), personal safety issues, responsibility for the card, and expected behaviour on board buses
- that the approval process would ensure that children and young people have their parents’ permission to travel
- to provide a link back to a responsible adult, which would allow future contact in the event of safety or behaviour breaches/concerns
- adding a layer of security to the application process, ensuring the information provided is accurate and reducing the risk of the system being abused/used fraudulently
- to provide a safeguarding measure, especially for children with disabilities and additional support needs
- that approval or a parent/guardian-controlled account was standard practice and required for other things for children under certain ages. Examples given included social media accounts and the Young Scot card

A few also suggested that parents should be able to have additional controls or means of monitoring use of the card/their child’s travel. This included being able to set limits on where and when they can travel, and/or a method for tracking when and where the card was being used (including, for example, restricting travel to local authority boundaries). It was suggested that an app could allow this functionality.

Finally, several respondents (both in favour of parental approval and not) suggested that the Young Scot card could be expanded to allow free travel on public transport rather than developing a new travel pass (as discussed above).

## Appropriate Approval Age

### Q5 At what age should parental or guardian approval be required?

If parental/guardian approval was put in place, respondents were asked what age of children/young people they felt such permissions should be for.

A total of 1860 gave a valid response, although not all could be quantified. Of these, 1771 gave specific ages which could be categorised and, of these:

- 613 (34%) gave ages within/up to the end of primary school where children should require parental permission (50 of whom suggested approval should be needed until a child was eight or nine, 89 until the child was 10 and 474 until age 11 or 12, or until the child transitioned to secondary school)
- 1028 (58%) felt that permissions should cease sometime during secondary school (of which, 131 felt it should only be needed up to age 13, 114 felt it should be needed up to age 14, and 783 felt it should be needed until the child turned 16)
- 82 (5%) felt permission should be needed until the child turned 18
- 48 (3%) suggested it should be required either until the young person turned 19, or for all ages that the scheme would cover

It should be noted that some respondents misinterpreted what was being asked and instead appeared to give views on either the age range that they felt the scheme should cover or the age range where parental approval should not be needed. These comments were included in the wider analysis, rather than being included here.

When looking at responses to this question by respondent type, the main points of note were that young people aged under 19, as well as organisations, were more likely to suggest a lower age for approval. Over half in both these groups thought that primary age was sufficient, with fewer suggesting it should be needed for secondary school aged children/those up to age 16. Conversely, those who did not fall into the category of either being a young person, parent/carer or youth worker were more likely to suggest that approval should be needed up to age 16, (with a slightly higher proportion of this group suggesting up to 18/19 compared to the other groups).

## Potential Impacts

In order to assess the potential impacts of the new under 19s free bus travel proposals on a wide range of stakeholders, three questions were asked. This included questions about likely impacts for children and young people as users (including those with protected characteristics) as well as those responsible for its implementation and operation.

## Impacts on Particular Groups

### Q6 Are there any likely impacts the proposals contained within this Consultation may have on particular groups of people, with reference to ‘protected characteristics’<sup>3</sup>?

Many respondents indicated that they saw no negative impacts resulting from the free travel pass scheme, with many of these highlighting that there were only **positive impacts**:

*“I can only see benefits to this proposal. It would help everyone no matter the age/sex/sexual orientation/religion.” [Individual]*

*“I can only see positive impacts in allowing all members of society to be able to travel, socialise and work.” [Individual]*

*“Providing a free bus pass [for under 19s] is likely to dramatically reduce inequality in particular for the groups with protected characteristics, as it will remove one barrier to accessing education, services and employment.” [Individual]*

Having a universal scheme may also **remove negative social stigmas** attached to free travel which is currently only provided for certain groups, it was felt:

*“We also welcome the universal entitlement approach as this will eliminate the stigma that might otherwise have arisen if there had been an element of means-testing of entitlement.” [Third Sector Organisation]*

In relation to specific protected characteristics, the **age criteria for eligibility** were viewed as potentially generating inequality and the main groups for whom eligibility could be widened were:

- all young people in full time education, apprenticeship or other training or volunteering programmes
- all under 25s, in line with minimum wage provision<sup>4</sup> and to make it better aligned with the Young Scot National Entitlement card
- young carers, up to age 25, on the basis that free bus travel would allow them to access education and further education opportunities, while also allowing them to remain connected to friends and family:

*“For many children and young people with caring responsibilities, access to free bus travel will positively impact on their wellbeing. Many young carers run errands for their cared for person which requires travel, such as picking up prescriptions and undertaking shopping. If their cared for person is in hospital or a resident in a care home, the young carer may frequently require to travel for visiting and providing care.” [Carer’s Organisation]*

---

<sup>3</sup> The protected characteristics listed in the consultation paper included age, disability, sex, gender reassignment, sexual orientation, race, religion or belief, pregnancy and maternity.

<sup>4</sup> Several respondents also suggested 21 as an extended eligible age.

For **people living with disabilities**, the challenges discussed related mainly to the accessibility of the bus network, bus facilities/design and existing infrastructure rather than specifically to the new proposed scheme (with comments that spending money on making transport more accessible for disabled people should be a government priority).

Comments that did link specifically to the new entitlement focussed on the need for additional support that may be required to help some young people apply for/obtain the card (especially those with mental ill-health, learning and communication difficulties or literacy issues). It was felt that the scheme would need to be carefully managed for children and young people with learning disabilities and mental health conditions, both in terms of supporting them to sign up for the travel pass, but also in how it was implemented to minimise risks (e.g. of them running away or other safety concerns related to them travelling unaccompanied). While accessibility was key for disadvantaged groups and disabled young people (including those with hidden issues such as autism, learning difficulties/disabilities, mental health conditions or behavioural/social and emotional issues) there were also concerns that these young people could be placed at greater risk by travelling unaccompanied.

It was also suggested, however, that the scheme could help to reduce differences between disabled children/young people and their peers, both as they would no longer need to apply for a bus pass linked specifically to their disability, and to reduce the employment gap between disabled and non-disabled young people:

*“Free travel [for under 19s] could go some way to helping destigmatise the concessionary travel already available to young people with a disability. There would be no need to show a different card and no question of why someone is not paying a fare, as everyone will be eligible. We would hope this might make existing under 19 concession card holders more likely to travel by bus more often with their peers.” [Bus Operator]*

Disabled and seriously ill children and young people/children with additional support needs may also benefit from the scheme on the basis that it would give them, and their siblings/families greater opportunity to access recreational opportunities as well as access support services. Consideration could, however, be given to extending the scheme to allow vulnerable and disabled children/young people to travel with a carer/companion free of charge or at a discounted rate, it was suggested.

Issues linked to **gender reassignment**, as well as gender fluid and non-binary individuals included that:

- the application form and any names printed on the travel pass may create barriers for transgender young people as many of them go by a different name than their legal name
- drivers should be trained in gender identification so as not to cause embarrassment where a name on the card does not match the child/young person’s current gender or appearance
- the travel card should be gender neutral
- should a photo be needed on the card, these should be updated regularly

- capacity for cards/accounts to be updated regularly (and quickly) where necessary to reflect any changes in gender identity

In relation to **other protected characteristics**, it was felt that the scheme would be particularly beneficial for girls and young women. In particular, the safety of young women may potentially improve as they would be able to take the bus rather than having to walk alone (this was also discussed as a benefit for young people more generally). The scheme may also assist those in abusive relationships or where there is financial abuse allowing them to have more freedom and independence. It would also help mothers to reduce household costs and provide more opportunities for their children by cutting associated travel costs<sup>5</sup>:

*“I think there will be positive impacts for women as the cost of public transport can make travel prohibitive for those caring for children, which tends to be women.” [Individual]*

Safety concerns for young women and girls on board buses were also discussed, however, with several highlighting that young women and girls often feel vulnerable on-board buses (as did some others). Safety of young people on buses was a key theme across the consultation that may need to be carefully managed if the scheme was implemented.

Other possible negative impacts for **other passengers with protected characteristics** included that there would be a lack of seats for other travellers during busy times/on busy routes (e.g. older or disabled travellers who may need them). There was also a concern that unaccompanied children and young people would not give up their seat for older travellers, disabled people, and pregnant individuals. It was suggested that an educational campaign to encourage young people to behave appropriately was needed. It was also felt that additional services/increased frequency of services may be required in some areas and/or additional priority seating may be required as a result of the scheme.

Anti-social and abusive behaviour from young people directed at other passengers with protected characteristics was also mentioned by just a few (e.g. older people, disabled people, lone women, those from minority ethnic groups, LGBTI individuals, those with visible religious beliefs, etc.). It was felt that anti-social behaviour, abuse and harassment may discourage others from travelling on buses already carrying groups of young people. There was also a safety concern for some young people themselves who may also be bullied by others on board. Again, it was suggested that there should be a limit on the times when children/young people can use the bus services for free, with restrictions placed on night services to avoid anti-social behaviour:

*“As this proposal would encourage more people to use buses there should be measures in place to protect people from abuse/harassment as buses are often a place where this takes place.” [Individual]*

---

<sup>5</sup> Such arguments would, arguably, also apply to young men/young fathers although this was not mentioned explicitly in responses.

Some suggested that greater awareness training was needed for drivers so they are aware of the scheme and to develop positive attitudes towards young people/to challenge negative stereotyping (especially for people from BAME backgrounds).

Ensuring that young people living in **island communities** were not excluded from accessing key services where journeys required use of both bus and ferries was again stressed, and it was suggested that an Island Communities Impact Assessment (ICIA) be carried out in line with the Islands (Scotland) Act 2018 to ensure that islands receive fair treatment tailored to their unique circumstances and needs.

Finally, several respondents expressed concerns that this scheme should not in any way reduce, remove or threaten the free travel scheme currently provided for the over 60s.

### **Q7 Do you think the proposals contained within this Consultation may have any additional implications on the rights, wellbeing and safety of children and young people?**

This question again attracted comments similar to those already raised in response to earlier questions with the **main positive impacts** including that the scheme would provide increased opportunities for children and young people, by allowing greater access to education, employment and recreational facilities as well as fostering greater independence and autonomy for the younger generation.

Other specific positive impacts or benefits for children's and young people's rights, wellbeing and safety included:

- encouraging children and young people onto public transport had the potential to reduce the likelihood of road traffic accidents
- that the scheme has the potential to develop more sustainable travel behaviours in young people and tackle climate change/be better for the environment
- encouraging young people to use the public transport network would improve their confidence and resilience
- life chances would to be improved by providing better access to job and leisure opportunities
- health outcomes would be improved as the proposal will encourage more active lifestyles (although several were concerned that young people would walk less as a result of having access to free bus travel):

*“Can only be a good thing in moving the population way from car ownership and into more sustainable forms of transport. Better for the environment and also for public health as inevitably will increase general activity levels.”*  
[Individual]

The proposals were also felt to be supportive of various United Nations Convention on the Rights of the Child (UNCRC) Articles.

Several felt that children could and did already travel unaccompanied on buses, and so safety concerns would be unchanged by this proposal:

*“I think there are risks with all forms of travel for children. Many children already use the bus as a form of transport and in general it works well, I don’t think this would change just because more people would have access.” [Individual]*

The **main negative impacts** or concerns included:

- it being too easy for children and young people to place themselves in danger, to go missing, to abscond/run away or travel very far without their parents’/guardians’ permission or knowledge
- data protection issues, including the nature and extent of the data to be stored and how it would be used was a concern, e.g. the child’s identity, location and timings of journeys. Similarly, there were concerns over children and young people carrying identification which contained personal and/or sensitive information

Measures that were posited to mitigate against safety concerns included:

- that increased security monitoring, such as CCTV, covering all areas of buses would need to be in place
- that safe walking routes to access bus stops would need to be established
- the importance of bus stops being safe and well-lit
- the need to explore potential issues with young people who were a suicide risk, as travelling anywhere across Scotland could make them more vulnerable
- using varying card colours to indicate if a child requires to be travelling with a responsible adult
- training bus drivers to deal with the array of issues that children/young people travelling alone may present

Further concerns or negative impacts linked to children’s and young people’s rights, wellbeing and safety which were noted by several/a few respondents included:

- the possible need for parental approval would disadvantage, or impinging on the rights and wellbeing of some children/young people
- that some parents (particularly those with low incomes who could not afford the cost of the adult fare) would put their child on the bus unaccompanied before they were mature/responsible enough for this
- that it could create/facilitate gang related issues or increase drug and alcohol related issues as they could travel further afield to access these (with a few suggesting it could result in children and young people being exploited to move drugs around with zero transport costs)
- the risk of children and young people losing their card and any implications or difficulties caused by this
- that children and young people will not learn the value of money if they are given this for free, and/or that it will lead to expectations of other free entitlements
- while some advocated limits to where (i.e. zones or distance limits) and when (i.e. times of the day/days of the week) the free travel pass can be used for safety

reasons (particularly for those aged under 16), a few highlighted that any blanket restrictions could also impact negatively on those with jobs which require shift work patterns or greater travel distances, thus limiting the impact on young people to find and retain employment

- some children may be given less freedoms and independent opportunities by parents due to concerns they may use this scheme and parents will not know where they are

The potential for poor or anti-social behaviour from young people on board services was again mentioned frequently. Similarly, it was suggested that young children should need to be accompanied by an adult, and that parents should be responsible for deciding when their child is old/responsible/mature enough to travel alone.

## Impacts on Organisations and Businesses

### 8. Do you think the proposals contained in this Consultation are likely to increase or reduce the costs and burdens for bus companies, public bodies, third sector organisations or businesses?

This question attracted a strong response, however, a large proportion of respondents simply noted that costs and burdens would 'increase' (without offering any further details) or said 'yes' (again, without providing further details).

Among those who did provide substantive responses, the main issues to emerge (many of which repeated responses to earlier questions) were:

- perceived increased costs to the taxpayer/public purse (with many questioning if/how the Scottish Government could afford such as scheme)
- perceived increases in administration/bureaucracy for public services responsible for overseeing the scheme

For **bus companies**, the need for fair reimbursement/compensation was the main emerging theme, with concerns that if this was not calculated accurately or done appropriately, bus companies would suffer losses:

*“With the additional patronage being driven by increases in young persons being reimbursed at a rate which is likely to be lower than the adult fare equivalent these passengers will be carried at a lower yield per passenger/yield per mile and, as such, a greater number of additional passengers would need to be generated to cover the increased cost of operation. Additionally, young persons are more likely to travel in evenings, where service provision is lower and indeed in many areas is either not operated or operated either by larger operators or with funding support from local authorities. Again, increased demand at this time may lead to disproportionately high additional operating costs to operators.” [Bus Operator]*

Concerns were also raised that the reimbursement rate for the current free bus scheme is based on the adult single fare. This can, it was suggested, incentivise bus



operators to increase single fares to maximise reimbursement payments which, in turn, has a disproportionately negative impact on people on lower incomes who cannot afford ticket prices. This should be factored into the reimbursement calculations, it was stressed, to ensure that it did not apply here:

*“...a ‘no better, no worse’ model may not be suitable for this scheme as this has proved to negatively impact operators in the very recent past - a new improved method of reimbursement may be required.” [Bus Operator]*

Similarly, children and young people have different trip patterns from older people (including making many essential rather than discretionary journeys to education, employment and training) and this would also need to be reflected in the reimbursement formula, it was suggested, so that the reimbursement rate for these trips more closely reflects the actual fare that would have been charged.

Any need for additional capacity to meet the travel patterns of young people would also need to be reimbursed appropriately with time-based variation in rates considered:

*“The economics of providing additional capacity for new demand predominantly at reduced fare is incredibly difficult for any operator to justify on a commercial basis. If no time-based variation in reimbursement rates are to be considered as part of the scheme then operators could face financial challenges in providing adequate capacity.” [Bus Operator]*

The Scottish Government was also urged to invest more in infrastructure to support the scheme to ensure its long-term success and longevity:

*“Bus operators require continued support from the Scottish Government and local authorities regarding infrastructure improvements to enhance punctuality, speed up journey times and reduce congestion on the roads. In order to effectively encourage modal shift, the whole travel experience must be desirable - not just the financial element of free journeys.” [Bus Operator]*

It was also noted that the scheme was likely to have different cost impacts on island communities. The reimbursement formula would need to take account of diversifying rural public transport/Demand Responsive Transport (DRT) bus services to ensure that more rural DRT fares, and any changed fare structures arising from such services were covered. Reimbursement may not in real terms benefit rural services to the same extent, it was suggested, and therefore may impact on the viability of more rural routes:

*“A regional approach to fare structures/reimbursement levels across differing local authorities might be beneficial in supporting and fairly recompensing more rural operators, potentially coordination through Regional Transport Partnerships could assist in regularly reviewing and standardising ‘equivalent’ fares.” [Regional Transport Partnership]*

Recognising the unique needs of non-mainland communities, an Island Communities Impact Assessment (ICIA) was again encouraged, in line with the Islands (Scotland)

Act 2018 to ensure that islands receive fair treatment tailored to their unique circumstances and needs.

Other comments were made that free travel for under 19s, when combined with travel for over 60s would leave the range of fare paying customers quite narrow:

*“Taking under 19 passengers and over 60s out of the equation leaves a narrow window of ‘normal’ fare-paying passengers, thereby reducing the opportunity for operators to increase their revenue and therefore invest in their fleet. Ideally, operators need to find a way to benefit from the scheme or our scope for surviving and thriving in the future is limited.” [Bus Operator]*

While many respondents were concerned about fair pay to bus operators not being realised, there were also many views that as long as reimbursement rates were appropriate, there could also be long-term benefits for bus providers:

*“...if the reimbursement levels are not set at the right level there is a potential to reduce the revenues for bus operators, particularly in the short to medium term. Conversely, there is the potential, in time, to create modal shift and a legacy of bus use beyond age 19 and this should increase revenues for bus operators.” [Local Authority]*

The other perceived costs and burdens for bus companies included:

- negative impacts on bus drivers through confrontations/having to deal with anti-social behaviour
- possible costs associated with damage to vehicles caused by increased numbers/frequency of young people travelling (including increasing costs for cleaning, maintenance, repair, and loss of potential revenue)
- possible reduction in competition and innovation in bus services
- a necessary increase in the complexity of administrative arrangements to ensure that operators are reimbursed appropriately for journeys taken by those who have taken them
- potential need for more buses/larger buses/more services to meet demand (especially at peak times) to address possible over-crowding
- a loss of ‘farebox revenue’ compromising ability to further invest in services, thereby reducing standards and risking the loss of passengers across the board:

Overall, however, it was felt that the scheme would be beneficial in the long term for the bus industry and would be supported by the bus industry as young people become fare paying customers over time, as well as if families with qualifying children travel more (with fare paying adults):

*“Any scheme that encourages the current adoption and increased future use of public transport will likely be viewed in a positive light by the industry as a whole.” [Local Authority]*

Specific comments linked to **local authorities and other public bodies** included:

- additional cost burden/administrative load for councils to administer the distribution of new cards, issuing of updated cards, ensuring any photos were updated, and updating changes of name or address
- costs associated with issuing replacement cards, with anticipated higher rates of replacement, or “*card churn*” for this demographic
- if funding for the scheme was ‘capped’, potential that local authorities (subsidising services) would have to pick up the additional expenditure
- higher costs to local authorities if operator’s revenues decrease and this loss is passed on through higher contract costs for tendered services
- possible costs to local authorities of needing to provide/subsidise additional peak, evening and weekend journeys that are not commercially viable

*“On some bus routes, particularly those commercially operated, increased demand at peak times could require bus operators to introduce duplicate vehicles. This would need to be factored when considering the reimbursement mechanism or otherwise the commercial viability of bus journeys/services could be detrimentally impacted. Under such circumstances should operators withdraw bus journeys there could be a knock-on effect for local authorities who may need to reallocate their finite supported bus service funds to reinstate withdrawn journeys.” [Local Authority]*

Several respondents also mentioned burdens linked to managing school transport provision. More detailed discussion and engagement was encouraged to fully assess the financial implications of the scheme for local authorities due to the differences in school transport provision that exist between them:

*“Although there is a potential for reducing costs where local authorities purchase tickets on commercial services for home to school transport the structure of this differs across Scotland. For example, some local authorities where there is entirely dedicated school transport will not see a change in costs as a result of the introduction of the scheme. Conversely, where local authorities currently rely on income from fare paying pupils, the scheme may result in a cost pressure should that income be removed without a variation to contract costs.” [Local Authority]*

Consequently, any consideration of financial impacts or changes would need to reflect variances across local authorities and would require to retain the flexibility councils currently have to determine the most appropriate local home to school transport structure for the area, it was stressed:

*“There will likely be some capacity management issues to resolve in the short term...as a result of initial surge in demand around school start and finish times and this will require careful planning by operators on impacted routes.” [Local Authority]*

Comments linked to the **third sector** were mainly positive and focussed on cost savings, including:

- that third sector organisations may find it easier to recruit low- or no-income volunteers
- free access to public transport may reduce burden on charities providing transport options or funding to young people for medical/healthcare appointment, visitation appointments, young carers, etc.
- charities/third sector organisations would no longer need to reimburse travel costs for those using their services, including young volunteers

*“...third sector youth work organisations spend hundreds of pounds on bus tickets for their participants so their costs will reduce massively, meaning that they can use their funding for other purposes.” [Individual]*

Importantly, these benefits were seen as being less pronounced in rural and remote areas where subsidised or charter transport to allow young people to access opportunities were seen as probably still being necessary.

For **businesses**, several respondents simply noted that the proposal would be “*good for businesses*” (without saying in what ways), and most other comments were also positive including that:

- it would provide a net benefit for businesses who work with or rely on trade from young people, who will have additional access to their services
- the scheme would help young people reach their places of employment more easily (reducing associated costs to employers of lost working hours/challenges of reaching suitable employees/trainees)
- removal of employability services having to pay for bus passes for under 19s to travel to their job, college setting, work placements and personal development courses

The main negative comment was that the scheme may impact negatively on the taxi, rail and tram industries by removing a core part of their customer base.

While costs and burdens would undoubtedly increase, many again stressed that these would be offset or outweighed by the benefits to be gained, including:

- ease for young people from poorer backgrounds to work and study
- that it would embed and normalise bus travel for young people, thus increasing future customer base for bus companies (as young people get older and have to pay)
- potential for bus services to improve as footfall increases
- reduced car usage, congestion and emissions and associated benefits to the environment

Finally, some respondents indicated that they were not sufficiently knowledgeable to answer this question while others suggested that the consultation document did not provide enough data and information on costs and government resources required for the operation of this scheme to make an informed judgement in response to this question. The consultation document also did not specifically address how the proposed scheme would interact with local authorities’ statutory requirements for

providing home to school transport provision, and more information on this was encouraged.

Some respondents urged further engagement with key stakeholders to help identify and resolve any identified issues prior to commencement and, thus, ensure the delivery of a scheme that meets the desired objectives with minimal burdens on transport providers, public bodies and businesses. Regular and ongoing monitoring of impact and uptake of the scheme was also again seen as essential in helping to identify and address any significant issues as they arise.

## Other Comments

Respondents were invited to comment on any other issues of relevance that had not been covered elsewhere in the consultation. This mainly resulted in respondents providing more detail on issues already covered elsewhere, with very few new themes to emerge.

## Bus Service Issues

Several respondents used this question to stress that, for the scheme to work, it was essential to reform bus services rather than simply offering free travel to young people. Issues were identified with the infrastructure in place, long journey times, the current geographical coverage and the reliability and predictability of services. The need for bus routes to be reviewed was also consistently highlighted along with complaints about services *per se*. Concerns were raised by many as to the quality of current bus service provision across Scotland and it was emphasised that Scotland needs a transport infrastructure which provides high frequency, rapid movement of people around the country. A large group of respondents highlighted issues with infrastructure in rural communities in particular, with limited direct routes between locations. A few participants suggested that funding would be better allocated to fixing these difficulties and others proposed that these concerns should be addressed to make the current proposal of maximum value, with equitable access to all Scottish residents.

Others set out suggestions for better 'on board' experiences and many respondents used the consultation to highlight frustration with the current high costs of bus fares in general.

It was suggested that climate change aspirations should be promoted with bus companies being required to use appropriate vehicles and to switch to electric or hydrogen power. Commitments to the net-zero emissions target by 2045 were highlighted to reinforce the value of these changes.

## Managing Behaviour

Concerns were raised in response to various questions about the potential for anti-social behaviour occurring on buses following the launch of this initiative. Specific other concerns raised at this question included: drug taking, smoking, drinking, bullying, abusing staff, toileting, vandalism, graffiti, gang fights, and vagrancy.

It was suggested that strict behavioural rules should be laid out with public awareness raising activities linked to these. Suggested rules to manage young

people's behaviour included a limit to the group size/number of young people being allowed to travel together at any time and a ban on alcohol consumption on buses. It was also suggested that individuals be required to travel to an end point, rather than simply staying on the bus to socialise.

The need for clear plans and resources to enforce positive behaviour rules was highlighted. Again, it was suggested that bus drivers would benefit from training and support to manage difficult behaviour. Chaperones, security persons, or bus conductors were suggested by a few respondents to help reduce risks to children, young people, other passengers and bus drivers alike.

A number of people suggested that restriction for travel might be appropriate, for example, Monday to Friday 7am-7pm, or not after 8pm for people under 18 or 16 to avoid vulnerable people not being out late. In contrast, a number of respondents highlighted that it was vital that time restrictions were not imposed to avoid young people being stranded if they missed cut-off times. Other restrictions suggested related to limiting the number of journeys permitted within a day to avoid misuse.

One suggestion made by a number of respondents was that repeat anti-social offenders should have their pass electronically updated meaning that they are refused free transport (temporarily or permanently) in the future as a consequence of their behaviour.

### **Digital Management**

Again, as most young people have access to a smartphone and are aware of how to use apps, it was suggested that a digital ticket option should be available. To accompany this, a few respondents suggested that a digital portal be developed and made accessible to parents/carers to allow them to monitor and potentially approve travel. Parental controls could include the option to freeze independent free travel as well as to monitor journeys being made (e.g. boarding stop, date, time, route, operator, etc.). It was suggested access to this information could be helpful should anything untoward occur. More generally, a 'self-service' website was recommended to address issues including new cards, replacements and up to date photos.

### **Implementation and Delivery Costs**

Again, a range of concerns were raised and clarification sought in relation to the funding of the scheme. A considerable number of respondents perceived the scheme was a waste of taxpayers' money, with many citing it as a vote winning exercise.

Others again raised concerns about why this scheme was being prioritised when there were so many other areas which could instead benefit from additional investment, with suggestions including health services, education, creating jobs, attracting businesses to Scotland and work to contribute towards an integrated public transport system.

A number of comments relating to the national concessionary travel scheme for over 60s were also made, with people feeling that this entitlement was perhaps more deserved, and that it must be protected/not suffer as a result of the under 19s scheme being introduced.

## Alternative Approaches

A number of alternative approaches were posited for under 19s instead of the proposed scheme, including flat fares and subsidising other forms of transport as part of the scheme. Again, a large number of respondents also recommended that the scheme should be extended to all public transport use for under 19s, to include rail, ferries, trams, subways and bike-hire schemes. A small number suggested means testing for the scheme or discounted rather than free travel. Others suggested free public transport for all to reduce the bureaucracy and enforcement challenges of free bus travel only for specific age groups.

## COVID-19

Throughout the consultation, a number of people queried how the initiative would impact and be impacted on by the ongoing COVID-19 pandemic. It was highlighted that people had been/were being discouraged from using public transport to promote social distancing, however, when buses were crowded, particularly at peak times, this becomes challenging and may be exacerbated by the new free travel for young people. Issues with young people opting not to wear masks on buses was raised as well as potential for increased COVID-19 transmission if lots of young people gather at bus-stops and on buses

Challenges were also highlighted for transport operators currently facing reduced incomes as a result of guidelines to minimise public transport use/ people being fearful of public transport. Views were expressed that bus patronage had declined in recent years, exacerbated by the COVID-19 pandemic, raising wider questions around sustainability of the bus industry (which would impact on the scheme longer term). In order to meet its objectives across the whole of Scotland, the proposed scheme must be combined with stronger support for and regulation of rural bus services it was stressed since they were most likely to be impacted in the post-COVID environment.

Finally, a small number of respondents mentioned that young people would be among those most in need of financial support as a result of COVID-19 given the impact this has had on redundancies and unemployment (both temporary and permanent) of both young people themselves and their parents/carers. Overall, the negative impacts of the pandemic on young people were seen to be significant and likely to be long term and so the scheme was welcomed on the basis that it would help to reduce post-COVID burdens for young people.

## Feedback on the Consultation

Finally, several comments were made in relation to the consultation itself including that it could have been more accessible for younger audiences/easier to understand, that it was not sufficiently well advertised and that insufficient information had been provided on the rationale and expected outcomes of the scheme. Specifically, more information would have been welcomed on the rationale for the age limit, rationale for the mode covered (i.e. buses only), expected modal shift impacts, anticipated wider benefits (other than to children and young people) and expected costs of the scheme.

Despite this, many respondents reiterated that the proposal was welcomed and should be implemented as soon as possible. A number of people highlighted that they perceived the scheme was 'progressive' and welcomed that the initiative would give children and young people the opportunity to travel throughout Scotland to get to know their country better.

Overall, in order to be successful, it was recommended that the scheme be taken forward in collaboration with bus companies, local authorities, education bodies and young people themselves to ensure that all practical and cost considerations are adequately addressed. Sentiments largely reflected that embedding bus use among this demographic now, by introducing such a scheme, would protect services in the future with associated social, environmental and economic benefits.



## Summary and Conclusion

The consultation attracted a very strong response with a good mix in the backgrounds, experience and interests of those who took part. While many did not answer all questions that were asked, there was a significant volume of feedback and comments which reflected a broad range of interests, with clear patterns to emerge from the data.

### *Main Findings*

The large majority of respondents agreed that the proposal would contribute towards objectives to increase opportunities and reduce inequalities, by improving access to both employment and education opportunities, as well as social, recreational and cultural opportunities, especially for those living in poverty. Indeed, most perceived that there would be no disadvantages of the scheme to individual young people.

The scheme was very much welcomed on cost grounds, and was seen as removing barriers to travel for families on low incomes, as well as single parent households and families without access to private vehicles. The scheme was seen as helping young people to access opportunities further from home, as well as allowing them to make employment and education decisions that were unconstrained by concerns around cost of travel.

The scheme was also seen as empowering - providing a safe means for all children and young people to travel, giving confidence to parents/carers as well as giving children and young people a sense of independence and confidence to travel alone. Secondary benefits included those linked to health and wellbeing and climate change, with potential long-term benefits for the environment and the public transport sector if bus use became embedded as the mode of choice among young people.

The large majority of respondents supported the use of a smart card to establish eligibility for the scheme. These would assist drivers in determining eligibility, would help to minimise abuse or misuse of the scheme and help those administering the scheme to better understand travel patterns of young people (and to tailor services accordingly). Digital alternatives/backups for plastic cards were encouraged and seen as being more appealing to older young people in particular, as well as helping to reduce potential burdens linked to issuing replacements for lost cards (with lost, forgotten or misplaced cards seen as something likely to be a significant problem for this demographic). This would not be suitable for all, however, including younger children and others without access to such devices. Driver discretion in determining eligibility was also welcomed to mitigate against this same problem, as well as to facilitate travel for those who may struggle to operate with the card.

There was strong support for parental/guardian approval of travel card applications, especially for children up to 16 years age. Other responsible adults should also be able to approve, counter-sign or authorise cards, it was suggested, to help ensure that the scheme is accessible to the most vulnerable children and young people. Respondents suggested that more information about the application process would have been welcomed to inform their response, and noted that an accessible application and approval process would be necessary in order for the scheme to maximise reach and effectiveness.

Overall, while some respondents felt that the scheme was an unnecessary cost to the public purse, which may result in higher fares for those not eligible for concessionary travel, the majority view was that the benefits to children, young people and families would outweigh these concerns.

## **Impact Findings**

Most respondents indicated that they saw no negative impacts resulting from the free travel pass scheme for different groups of young people and, where negative impacts of the scheme were mentioned, these affected mainly bus operators and local authorities.

While greater bus usage may result in new routes being introduced and increased frequency of services for passengers, this would not necessarily result in greater income for bus operators and the need for fair and appropriate reimbursement rates emerged as a dominant theme. This was especially relevant in rural areas where reimbursement may not benefit services to the same extent. While it was recognised that it was difficult to estimate likely uptake of the scheme, careful thought should be given to the reimbursement model that would be used to prevent operators being left out of pocket.

While individual respondents welcomed that free bus travel would provide an alternative means of reaching schools, others expressed concerns that the scheme should not be seen as a replacement for home to school transport provision and that school bus services need to be protected to ensure they are viable and that the scheme does not unduly affect school bus services by offering an unrealistic return to operators.

Investment in infrastructure and other measures to improve service quality was also urged to ensure long-term effectiveness of the strategy and maximise its longevity.

For local authorities, many felt there would be increases in administration and bureaucracy if they were responsible for overseeing the scheme as well as possible cost increases to local authorities needing to subsidise routes that are not commercially viable. Should this become unmanageable, it may result in cuts to services, which would run counter to the wider aspirations of the scheme to encourage public transport use. While costs associated with administering the concessionary scheme and issuing new and replacement smart cards were also cited as a potential burden for local authorities, most viewed that these should be offset by increases in revenue.

## **Cross-Cutting Themes**

A key theme that cut across all questions was the need to acknowledge that the scheme may be experienced differently by those living in different parts of the country, especially those in rural and remote locations, including island communities. Some felt that the scheme would increase opportunities to access education, work and recreational facilities for such young people (who typically incur higher travel costs due to the need to make multiple bus journeys/multi-modal journeys to access the larger towns and cities). Others raised the potential for some unintended consequences arising from the scheme which might create some new transport

inequalities. Specifically, young people living in communities with limited or infrequent bus services would not benefit as much as their urban or sub-urban based peers where service provision was more prevalent.

While the main issue for rural and remote areas seemed to be concern around poor service levels, the more nuanced issue for island communities was that free ferry travel was considered essential to ensure parity between island dwelling young people and their mainland peers. There was a need to ensure that young people living in island communities are not disadvantaged due to their requirement to use a ferry rather than road transport alone to access opportunities. Parity for island residents was urged, and free ferry travel for under 19s was strongly encouraged. Overall, preventing inequalities in rural, remote and island communities would require concessionary travel to extend to include other modes, it was suggested.

Safety was also a dominant theme to run across different questions - both safety of children and young people as well as safety of other passengers and bus drivers. While a large proportion of respondents felt that the scheme would provide greater safety for children and young people, giving them greater flexibility on travel options when travelling alone or late at night, others felt that there were risks attached to letting children and young people travel unconstrained (especially very young children). Child protection concerns were essential to build into any planning for the scheme, it was stressed, including putting in place support and training for bus companies and drivers to identify and safeguard children where there is concern.

For bus drivers and other passengers, the main safety concerns were linked to potential overcrowding if there was a high uptake of the scheme, anti-social behaviour on buses, and the potential for children and young people to be abusive to drivers and other passengers. Mechanisms to penalise those who abuse the system should be in place, it was felt, including, for example, temporary suspension of travel rights through the scheme. Safety implications should be monitored and managed on implementation with scheme and service adjustments made, as appropriate, to provide all passengers with confidence.

## **Conclusion**

There was clear support for the proposal to introduce a concessionary travel scheme for under 19s, and this was evidenced among all main stakeholder groups. Equality of opportunity was the main perceived benefit, removing travel costs as a barrier to accessing social, educational, recreational and employment facilities. The main concerns focussed around the need to ensure that children and young people use the scheme responsibly, that they are protected as vulnerable bus users and that no undue administrative, enforcement or cost burdens are placed on local authorities and bus operators if the scheme is introduced. While the impact on other passengers, including potential for overcrowding and rising fares for those who do pay was also evident, the majority viewed that this was outweighed by the potential benefits to children, young people and their families. Uptake and safe use (as well as any abuse) of the scheme should be carefully monitored and reviewed, using a partnership approach with all relevant stakeholders. This would allow modifications to be made if appropriate, and would address many of the immediate uncertainties that were presented in the consultation.



**TRANSPORT  
SCOTLAND**  
CÒMHDHAIL ALBA

© Crown copyright 2021

You may re-use this information (excluding logos and images) free of charge in any format or medium, under the terms of the Open Government Licence. To view this licence, visit <http://www.nationalarchives.gov.uk/doc/open-government-licence> or e-mail: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk)

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

Further copies of this document are available, on request, in audio and visual formats and in community languages. Any enquiries regarding this document / publication should be sent to us at [info@transport.gov.scot](mailto:info@transport.gov.scot)

This document is also available on the Transport Scotland website: [www.transport.gov.scot](http://www.transport.gov.scot)

Published by Transport Scotland, January 2021

Follow us:



transcotland



@transcotland

**transport.gov.scot**



**Scottish Government**  
Riaghaltas na h-Alba  
gov.scot