Bus Service Registration Procedures

Developing best practice guidance

2016

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Transport Scotland 2016

Contents

1. Introduction

1.1   The current system for registering bus services has been in place since deregulation in 1986 and, while it has been adapted over time to reflect changing needs, the general principles remain the same. Despite attempts to modernise the system through the Electronic Bus Registration System (EBSR), take up for this has been patchy.

1.2   In 2012, the Minister for Transport and Veterans established the Bus Stakeholders Group (BSG), which brings together a range of private and public sector partners including the Confederation of Passenger Transport (CPT), Bus Users Scotland (BUS), the Mobility and Access Committee Scotland (MACS), the Traffic Commissioner for Scotland, the Association of Transport Coordinating Officers (ATCO), local authorities and Regional Transport Partnerships (RTPs). The Group was asked to consider opportunities for changes to bus policy that would enable positive change for bus users.

1.3   As part of this work, the BSG set up a working group to consider changes to the bus registration process. A consultation exercise was undertaken with stakeholders to gain views on a number of suggested changes to the process that were aimed at encouraging greater partnership working between operators and local authorities.

1.4   From the consultation, there was support for a number of the changes. However, some stakeholders suggested that it would be useful for guidance to be issued alongside the changes. Consequently, JMP was commissioned to consider the results of the consultation and to develop good practice guidance to accompany any revisions to the bus service registration process. The guidance would aim to encourage bus operators and public transport authorities to work effectively during the process of designing, varying and registering local bus services.

1.5   This report sets out the research we have undertaken and its findings, before going on to describe what constitutes 'good practice guidance'.

1.6   We would like to take this opportunity to thank all those who have contributed to the research, in attending workshop sessions, providing views or contributing other information.

2. **Bus Service Registration Process**

Current process

2.1   The bus service registration process is a formal way of maintaining a central register of local bus services. It is largely an administrative process, whereby bus operators provide route and timetable details of services to the Traffic Commissioner; these are processed by DVSA staff who work in the Office of the Traffic Commissioner. As long as all details have been provided correctly and the appropriate length of notice given, permission will be granted to operate the service. This remains in force until the operator applies to vary or withdraw the service, with the required period of notice.

2.2   As well as providing this central register, the process provides some formal status to services and an entitlement to provide a public service. It ensures that services are being operated by companies that are properly licensed to do so. It also provides a benchmark from which deviations can be measured, in respect of reliability and punctuality. Equally, the process provides time and route data from which timetable information can be made available to users, either by the operators themselves, local authorities, regional transport partnerships or through Traveline.

2.3   In 2013-14, there were 680 new bus registrations in Scotland, 1036 variations to registrations and 466 service de-registrations.

2.4   The timescales and notice periods required for the registration process have changed over time. These represent a balance between the different stakeholder interests. Clearly, operators want to have some flexibility to adapt services to take account of changing demands and commercial interests, while local authorities want time to consider whether they need to take any action in response to a proposed service change, and users want to see some stability in services.

2.5   If a bus operator wishes to operate a new bus service, or change or discontinue an existing service, it is obliged to notify the relevant authorities 14 days in advance of submitting the application for registration to the Traffic Commissioner. There is then a 56 day registration period with the Traffic Commissioner, following which the service or amended service, as detailed in the application, can be introduced. Therefore, the overall registration process is a total of 70 days. Where there is good reason, and with the support of a public transport authority, the process can be reduced with a short-notice registration made to the Traffic Commissioner.

Consultation into potential changes to process

2.6   In autumn 2014, the Bus Stakeholder Group (BSG) launched a consultation regarding a number of potential changes to the bus registration process. These included:
- Extending the period for notifying relevant authorities in advance of registration from 14 to 28 days
- Strengthening the requirement on bus operators to consult rather than simply notify the relevant authorities

- Encouraging the relevant authorities, where appropriate, to draw concerns arising out of registrations to the attention of the Traffic Commissioner and/or Transport Scotland
- Reducing the registration period from 56 to 42 days – either for all registrations or for those submitted electronically – in order to maintain the overall time taken for the whole process from initial notification to the start of the service at 70 days

2.7   Interested parties, including bus operators, local authorities, regional transport partnerships, professional organisations and trade body associations were consulted. The main findings of the consultation were as follows:

Question 1: Do you agree with the proposal to extend the pre-registration notice period from 14 days to 28 days?
Answer 1: For 48 (90.5%); Against 4 (7.5%); N/A 1 (2%)

Question 2: Do you agree with the proposal to replace the duty to inform the relevant authorities before making an application for registration with a duty to consult with the relevant authorities?
Answer 2: For 44 (83%); Against 8 (15%); N/A 1 (2%)

Question 3: Do you agree that the relevant authorities should be encouraged through guidance to draw potential concerns about new registrations to the attention of the Traffic Commissioner for Scotland and/or Transport Scotland?
Answer 3: For 43 (81%); Against 10 (19%)

Question 4: Do you agree with the proposal to reduce the period of registration from 56 days to 42 days? What difficulties if any do you consider such a change might present and how might these be addressed?
Answer 4: For 30 (57%); Against 19 (36%); N/A 4 (7.5%)

Question 4b: An alternative option would be to reduce the registration period from 56 days to 42 days only where Electronic Bus Service Registration (EBSR) is used. Do you agree with this?
Answer 4b: For 14 (26%); Against 37 (70%); N/A 2 (4%)

Question 5: Do you agree that we should require operators to detail within registered hourly frequency bands any services that are registered as frequent services?
Answer 5: For 38 (72%); Against 13 (24.5%); N/A 2 (4%)

Question 6: Do you consider that if the proposed changes set out above are adopted, they would improve the bus registration process in Scotland?
Answer 6: For 35 (66%); Against 13 (24.5%); N/A 5 (9%)

Question 7: It is possible that much of what is proposed could be achieved through Guidance and/or a Code of Conduct to facilitate engagement between operators and relevant authorities rather than changes to the legislation. Do you have any views on this?

Answer 7: Guidance preferred 15 (29%); Legislation preferred 31 (60%); Other 4 (8%); N/A 2 (4%)

2.8   In summary, the consultation responses indicated support for extending the pre-registration period to 28 days and for the 'duty to inform' to be replaced by a 'duty to consult' relevant authorities. It was accepted that authorities should be encouraged to draw potential concerns to the attention of the Traffic Commissioner and Transport Scotland. There was also support for a requirement for operators to provide more detail about frequent services, with an hourly breakdown of service frequency bands.

3. **Research**

Engagement

3.1   In the light of general support for change to the registration process, our aim was to engage with interested parties further to inform the development of guidance. In particular, we were interested in exploring views on:

- Good partnership working between bus operators and public transport authorities
- What would constitute best practice guidance for the bus registration process
- Barriers to the use and take-up of Electronic Bus Service Registration (EBSR)

3.2   A consultation exercise was undertaken to gain the thoughts and views on the current registration process, potential changes to the registration process, Electronic Bus Service Registration (EBSR) and partnership working from key stakeholders.

3.3   We sought to engage with:

- All operators (bus, coach, taxi community transport) of local bus services and their representative bodies
- All transport authorities and RTPs, along with representative bodies
- Other interested parties, including those involved in the bus registration process, professional bodies and those representing users' interests

3.4   Initially, a general introduction to the research was sent to all stakeholders. This set out the aims of the exercise, inviting feedback and thoughts, and gave an invitation to attend one of a series of six workshops. Stakeholders were informed that there would be opportunities to provide views even if they were unable to attend a workshop.

3.5   Topic guides were produced to guide discussion at the workshops. They were sent to attendees beforehand, so that they could come prepared to discuss the relevant matters, perhaps canvassing the views of colleagues. The topic guides were also sent to all stakeholders, partly to act as a reminder about the opportunity to attend the workshops, but primarily to give the same opportunity to provide views as those who were attending.

3.6   Copies of the topic guides can be found in Appendix A.

3.7   Six workshops were held in total during the week commencing 13 April 2015 in Glasgow, Edinburgh and Inverness. Certain of these were targeted on particular stakeholder groups. Representatives of the following organisations attended the workshops:

Glasgow 14/04/15 am - Operators	Glasgow 14/04/15 pm - Authorities
Traveline Scotland CityLink Stagecoach	Argyll & Bute Council Dundee City Council Stirling & Clackmannanshire Councils East Dunbartonshire Council Ayrshire Roads Alliance Strathclyde Partnership for Transport (SPT)
Edinburgh 15/04/15 am - Authorities	**Edinburgh 15/04/15 pm - Operators**
East Lothian Council Midlothian Council Falkirk Council City of Edinburgh Council Fife Council	First Scotland East Stagecoach National Express Dundee
Inverness 16/04/15 - All	**Edinburgh 17/04/15– Other interested parties**
Aberdeen City Council Highland Council Moray Council HiTRANS Community Transport Association (CTA) Mobility & Accessibility Committee Scotland (MACS) Stagecoach	Association of Local Bus Managers (ALBUM) Bus Users Scotland Confederation of Passenger Transport (CPT) Office of the Traffic Commissioner First Glasgow

3.8   Notes of the workshops were circulated to those who had attended, to ensure they were a representative record. This was also a prompt for further comment or to provide follow-up information.

3.9   A number of those organisations represented provided some additional information or comments following the sessions. In addition, we received comments from Aberdeenshire Council, who were unable to attend the workshops.

3.10   Where examples of best practice had been shared during a workshop, we followed up with further contact. Particularly in relation to instances of best practice, where an example included more than one stakeholder, each was contacted for their views and acceptance. We also attended the East Lothian Bus Forum to get a flavour for the partnership working between operators and local authority and to find out about its outcomes.

Analysis and guidance formulation

3.11   Using the information and views gathered, we collated the research findings and developed the elements that form good practice in relation to the proposed amendments to the bus registration process.

3.12   Representatives of the following organisations were invited to a further meeting on 28 May 2015, where we discussed the findings and sought views on the various elements of good practice and potential changes to bus registration procedures and guidance:

- Association of Transport Coordinating Officers (ATCO);
- Strathclyde Partnership for Transport (SPT);
- Community Transport Association (CTA);
- Bus Users Scotland;
- Confederation of Passenger Transport (CPT);
- Association of Local Bus Managers (ALBUM);
- Office of the Traffic Commissioner (OTC); and
- Regional Transport Partnerships (RTPs)

4. **Findings**

Registration Process

4.1 The issues to emerge from the research are summarised below.

Current Process

- In many cases, operators alert local authorities to proposed service changes prior to the 14 day notification period and some discussions occur.
- Some authorities are proactive and meet with operators within the 14 days, others are slow to respond, often with only a day or two to spare, and some require reminders from the operators for the email of receipt required for registration submission.
- Some operators stick rigidly to the required times because of concerns about potential breaches of confidentiality.
- Some operators provide minimal information in the 'change' box on the registration application form as they do not want the details published in Notices & Proceedings.
- The pre-registration period is often used mainly to verify details within the registration, picking up on timetable errors made by the operator.

Views on extending pre-registration to 28 days

- If extending the period, there needs to be a reason to do so and a meaningful process, as opposed to prolonging the current work undertaken.
- Some operators raised concern that having a longer time would increase the likelihood of confidentiality being breached. However some local authorities thought that this period should enable meaningful consultation and therefore allowing the registration information to be viewed by local stakeholders, such as community councils and elected members.
- Commercially-sensitive information could be kept confidential during the pre-registration period.
- A time extension may alleviate time pressures, particularly where authorities have made suggestions that the operator takes on board, as it takes time to revise timetables and routes.

Views on the registration period

- There were some differences of opinion over whether the 56 day registration period should reduce to 42 days if the pre-registration period was extended. Some stakeholders preferred the reduction, particularly for loss-making services, whilst others preferred 56 days to plan for the changes and prepare public information, although it was commented that using EBSR would help to reduce the time required.
- If the registration period was shortened, authorities would have less time to tender replacement services, which may result in more deminimis arrangements.

- Generally, a total registration process of 70 days was seen as about right, with debate on how this should be divided between the pre-registration and registration elements.

If required to 'consult' what should this involve?

- If there was a formal consultation, authorities may be put in a vulnerable position, and if put out to the public, there could be negative reactions. Formal consultation may also require input from elected members and therefore be tied to committee dates.
- It was generally considered that the only people that should be party to pre-registration consultation were officers of public transport authorities. Some operators felt strongly that information should remain confidential and not shared with anyone else during the pre-registration period. In more rural areas and where there was no competitive activity, however, operators were less concerned about information being shared with others, such as elected members and community councils.
- Operators felt that authorities should not be able to veto or delay proposed service changes through the pre-registration or registration process. The final decision regarding any service changes should be made by the operator.
- Some considered that the current system of 'notification' was more appropriate than 'consultation', although this could be improved to allow for a more meaningful process with deadlines for responses by authorities and the opportunity for operators to respond.
- There was some concern that consultation would slow things down.
- Where services are being de-registered, it was suggested that operators should automatically provide usage data to the authority as part of the 'consult' requirement, helping it to decide whether any action needs to be taken.

Traffic Commissioner input

- The general opinion of stakeholders was that any issues raised by local authorities should be covered within the pre-registration period. Therefore, there should be no need to raise issues with the Traffic Commissioner, unless there was a safety or traffic regulation issue that the operator did not resolve.
- The Traffic Commissioner should not have the authority to refuse a registration if completed correctly, as their role is a regulatory one.
- There should be a process to show that authorities have been properly consulted. Currently, this happens, with authorities confirming that they have been notified.

Electronic Bus Service Registration (EBSR)

4.2   Comments on the EBSR system were collected along with suggestions for improvement. Stagecoach is currently the only operator submitting registrations electronically. Other larger operators have the capability and may look to use in the future. The main barriers to using EBSR are the cost of the software, and the lack of any real perceived benefits to the operator of using it.

4.3   The main benefit of using EBSR is considered to be that all the data is in one place, requiring no further re-entry. The data can be fed directly to Traveline and real time information systems and transferred easily to journey planners, schedules and road side publicity. This therefore reduces manual input, reducing the chances of errors. In addition, it is easy to make amendments to services through the electronic process. Having all data in the same format creates a more auditable, robust record of service registrations, providing a comprehensive database of services to assist planning, and allows information to be immediately accessible.

4.4   Another benefit is the ability to bulk export at any time of the day and a reduction in the cost and hassle of postage, not to mention the environmental benefits and costs associated with a paper-based system.

4.5   Stakeholders identified a number of current drawbacks of EBSR:

- The system does not cope well with variations such as holiday dates.
- Mapping capabilities are poor.
- When timetables are printed, the size cannot be changed to fit better on a page.
- It is difficult to identify changes from previous registrations.
- The system can be unreliable, with some data not copying across properly.
- The information needs to be correct in the first instance; with paper registrations, mistakes can be rectified retrospectively.
- The system cannot cope with demand responsive transport (DRT) services, with area catchments.
- As the data submitted needs to be correct the first time, there is less opportunity for 'double checking', particularly by other parties who may identify mistakes missed by the operator.
- Difficulty dealing with split registrations.

4.6   Several suggestions were made to improve the EBSR system:

- A more sensible notification and receipt process, which also distinguishes between the different English and Scottish processes.
- Including the ability to attach files.
- Including a statement of change somewhere in the process, or enabling changes to be identified automatically.
- Having better mapping capabilities and text route description, and better printing capabilities.
- Enabling smaller operators to submit registrations electronically to achieve the real benefit of having complete electronic data.

4.7   There was some discussion regarding the support required for smaller operators to submit registrations electronically. Some suggested that smaller operators could use an 'agent', such as a local authority, who has the necessary software system to submit on their behalf. Others suggested the operators should be placed in a position to submit electronic registrations themselves, however, this would require funding and training. Concern was raised over fairness of funding –

when does a small operator become a large operator? Another idea was to create a web-based system whereby an operator would not need to purchase special software purely to enable a registration to be submitted electronically.

Partnership Working

4.8   The subject of partnership working was also explored within the workshops. The level of partnership working varies throughout Scotland, and there are examples of both formal and informal partnerships. Formal partnerships, such as Statutory Quality Partnerships and Punctuality Improvement Partnerships exist, but there are also some examples of good relationships where operators and local authorities work well together informally to achieve common goals, without it being called a 'partnership'.

4.9   It was felt that trust and confidentiality are key requirements of a successful partnership. Mutual respect, shared goals and understanding, commitment, resources/funding, accountability, equity, personalities, all parties contributing, clear, effective and open communication, and two-way dialogue were also cited as factors which contribute to a successful partnership.

4.10   There have been some examples of successful outcomes of partnership working. These include sustainability of the commercial market, improving standards of bus services, better information provision, improved punctuality, innovative solutions to transport planning, a coordinated approach to service planning, reduced number of service changes, multi-operator ticketing and smartcards, and improved emission standards increasing air quality.

4.11   The achievement of successful outcomes requires commitment from both parties. There are examples where the partnership has fallen down because one party did not deliver. This is often related to the level of funding and resource available.

4.12   The level of partnership working, in some cases, related to the level of competition. Some authorities felt operators are less likely to engage or in particular be willing to make changes, if they have the monopoly of services. In some instances, operators do not engage at all.

4.13   Other comments related to cuts to BSOG and concessionary fares reimbursement straining some relationships, issues arising because of lack of integration within the authority, for example between the passenger transport and highways teams, and taking care to ensure partnership does not evolve into collusion.

Examples of good partnership working

4.14   The consultation highlighted a number of examples of good practice relating to partnership working. These examples are set out below, along with two case studies.

- Although not required as part of the registration process, Stagecoach compiles a summary of service changes for Highland Council, which reduces the time required by the authority to establish the differences between previous and proposed bus registrations. This also occurs elsewhere.
- Although not required as part of the registration process, Fife Council meets with operators during the pre-registration period to discuss the changes to services. In addition, it meets with operators prior to the start of this period, if the service changes are likely to be substantial or significant. This allows for the commencement of data input earlier in the process in an effort to meet the deadlines for bus stop information production and Traveline submission.
- Although not required as part of the registration process, SPT provides written feedback to operators on their registrations during the pre-registration period.
- In Moray, registration submissions are reviewed in detail to consider connections with other services, whether additional destinations could be served, any potential impact on subsidised services, and whether journey times are appropriate.
- In Dundee, there is no formal partnership with operators, but items of common interest are discussed at operator meetings hosted by the City Council. The relationship between the authority and its operators is quite cordial.
- Regular bus forums are held in a number of areas between the public transport authorities and operators to discuss service amendments, operational issues and to allow both authorities and operators to air their views, issues and concerns. SPT, East Lothian and Aberdeenshire all have such arrangements.
- Stagecoach meets with its principal local authority colleagues at Angus, Perth & Kinross and Fife Councils on a regular basis, usually three times a year. On the agenda are a range of items, but anticipated service changes and enhancements are high on the list for discussion.
- Where major service changes for a network are anticipated, Stagecoach will undertake public consultation, for example in Dunfermline prior to major network changes in August 2014.

Case Study 1: Aberdeenshire

Aberdeenshire Council has a long tradition of working in partnership with bus operators across a variety of service delivery areas.

At a high level Aberdeenshire participates in a long standing voluntary quality partnership agreement with Stagecoach Bluebird, First Aberdeen, Aberdeen City and Nestrans. Linked to this, there is also a region-wide Bus Punctuality Improvement Partnership. Both agreements are overseen by the North East Scotland Local Authority Bus Operators' Forum (LABOF).

Past examples of partnership working include development of quality corridors whereby the authority has invested in improved infrastructure and information provision and the operator has increased frequencies and/or introduced better vehicles.

Other more specific examples relate to information provision. The Council's Information Strategy is based on the premise of partnership working. Examples include a long standing partnership to improve and maintain bus stop timetable displays, where Council staff costs are jointly funded. A current project to implement real time passenger information is also based on partnership working with operators.

Regarding ticketing, a multi-operator ticketing arrangement is currently being rolled out. While operator-led, it is administered by Aberdeenshire Council and has authority partners on the Management Committee.

Another example is the Area Bus Forums, which are held twice a year in each of the Council's six administrative areas. While administered by Aberdeenshire Council these are also the main consultative mechanism for local operators; Stagecoach Bluebird is an active participant. They are open to bus users and the general public with invitations sent to community councils, youth groups, senior citizen organisations and disability groups. In addition to being an avenue for consultation on policy matters, bus service and bus infrastructure requests and complaints are also raised and discussed.

Regular dialogue occurs between Aberdeenshire Council and operators (primarily Stagecoach). The Council is provided in most instances with advance warning of proposed service changes at regular liaison meetings and, in the case of major service changes, one-off meetings are organised between the operator and authority.

It is difficult to quantify the benefits, but it is considered that partnership working has delivered direct passenger benefits through improved service levels and indirectly through development of an environment of trust between the parties. Through this trusting relationship it is commonplace for the operators to disclose commercially-sensitive patronage and other data to the Council.

Case Study 2: East Lothian Bus Forum & Charter

The East Lothian Bus Forum meets twice a year and includes representatives from East Lothian Council, bus operators, community councils, DVSA and MSP. The Forum has a relaxed atmosphere where all parties can freely discuss, raise concerns, appreciate and comment on each others' work; and work as a team for the benefits of serving local communities, helping to promote businesses and visitor trade. Advice and guidance are also provided, and solutions suggested, discussed and agreed.

The aim of the Forum is to work together to improve passenger transport. As such, it has developed the East Lothian Bus Passenger Charter. All key stakeholders are signed up to the charter; bus companies, East Lothian Council and passenger groups commit to certain working practices. #

As a result of the charter, bus information has been coordinated and improved, both at the bus stop and on websites. In addition, operators limit their service changes to twice a year. Although there is no official agreement requesting operators to do so, the Forum considered it was in the best interests of the passengers to limit the number of changes and operators adhere to this as a result of good working relationships and commitment to improving services.

Through this relationship, operators already consult with the local authority over service changes, and often well in advance of the 14 day pre-registration period.

The partnership has resulted in greater consistency and better information for the bus passenger, which has led to increased patronage and better passenger transport experience for all.

SWOT Analysis

4.15   To consolidate our findings regarding the current system, a SWOT analysis was undertaken. This highlighted elements that should be built upon in future and other aspects where a revised approach might bring benefits.

Current System

Strengths	Weakness
- Timings and procedures well accepted - Provides a balance between needs of operators and authorities - Can be used by all, without the need for costly software	- EBSR use patchy - Out of step with information provision - Double entry of data - Inconsistent application of process (local authorities who do not engage during 14-day period; operators who do not consult; use of short notice registrations) - Does not necessarily encourage dialogue between operators and authorities
Opportunities	**Threats**
Freedom to voluntarily extend collaboration and liaison, thus strengthening 'partnership'	Tensions between information provision and regulatory scrutiny

5. Recommendations

5.1   Information gathered from the workshops was used to suggest a way forward for the bus registration process. This was then presented to stakeholder representatives in a further workshop on 28 May 2015. These ideas were discussed and the outcomes of this workshop, along with our final recommendations, are set out below.

5.2   The research highlighted a strong desire by all parties to retain the pre-registration period, and to make this a period of consultation rather than notification. Although some thought this period should be used to consult with elected members, community councils and members of the public, there was acceptance by transport authorities that the information provided by operators within this period should be treated confidentially.

5.3   With regard to wider consultation, it was felt that operators should be consulting with passengers and other interested parties about potential service changes prior to the pre-registration period. While during the pre-registration period, local authorities would be scrutinising proposals on behalf of users and communities, commenting on them in the public interest.

5.4   There was discussion as to whether there should be a formal agreement over confidentiality. All agreed that this was not necessary; current arrangements worked satisfactorily. Also, in the spirit of good partnership working, all parties should recognise the importance of keeping information confidential during the pre-registration period.

5.5   Where proposals were to withdraw services, operator representatives agreed that data, such as passenger numbers, concessionary fares reimbursement, revenue and costs should be made available to transport authorities. This will help local authorities to decide whether or not to support a replacement service.

> **Recommendation 1**:
> Retain the pre-registration period and make it a period for operators to consult with local transport authorities. Information should be kept confidential between operators and local authority officers during the pre-registration period, unless otherwise agreed with the operator. The term 'consult' means to provide information, discuss, consider and action matters agreed by both parties. Where a service is to be withdrawn, the operator should automatically provide usage and revenue data to the local authority.

5.6   There was a general acceptance that the pre-registration period should be extended from 14 days to 28 days to allow more meaningful engagement. However, it was felt that this time period should have some structure. Stakeholders considered that if both parties were in agreement, this period could be reduced in order to reduce the overall registration period.

> **Recommendation 2**:
> Extend the pre-registration period to 28 days. The first 14 days should be used by the transport authority to consider the registration and provide any comments, concerns and suggestions back to the operator. The latter 14 days should be used to meet and correspond further with the operator over the proposals. If both parties are content within the first 14 days, the operator should be permitted to submit the registration on day 15.

5.7   Good partnership working is key to a constructive pre-registration period and it is hoped that by ironing out issues in advance of registration submission, other processes leading up to the service introduction or change will run more smoothly. In the spirit of good partnership working it is expected that operators would approach transport authorities well in advance of the actual pre-registration period, particularly in instances of large scale network changes. Stakeholder representatives considered this to be a sensible approach.

5.8   While the pre-registration period should have a requirement to consult, it is important to recognise that there is no obligation to 'agree'. If agreement has not been reached between an authority and operator during the 28 days, the operator should still be able to submit the registration to the Traffic Commissioner. As part of the submission, authorities should confirm that they were properly consulted. Where agreement was not reached, any outstanding concerns should also be indicated to the Traffic Commissioner, for information purposes only. This should not affect the outcome or decision made by the Traffic Commissioner, unless it is a matter of concern relating to safety, licensing, non-adherence to the registration process, or incomplete registration.

> **Recommendation 3**:
> The registration submission should incorporate a confirmation from the relevant transport authority or authorities that they have been properly consulted. There should also be the opportunity to record any unresolved concerns, only for the Traffic Commissioner to note.

5.9   The main issue on which there were some differences of opinion was that of the length of the overall registration period. Operator representatives were very keen that the overall   registration period should not go above the current 70 days (14 days pre-registration and 56 days registration). Therefore, if there was to be a 28 day pre-registration period, they felt that the registration period should be reduced to 42 days.

5.10   Local authority representatives were concerned that reducing the registration period to 42 days would not allow enough time for passenger information to be prepared for service changes. SPT, however, supported a 42 day registration period, following the 28 day pre-registration consultation.

5.11   Traveline previously indicated that it requires 21 days to process information to include on its website and journey planning tools. The Office of the Traffic Commissioner indicated that they sought to process complete and correct registrations within 5 days and so did not envisage a problem with a 42 day registration period.

5.12   On balance, therefore, it seems reasonable not to extend the overall registration period. All current actions can be undertaken within the 70 day period so we recommend this time frame is kept, but the distribution of time amended to give a longer pre-registration period. If full information is provided at the commencement of the pre-registration period, it would be possible for local authorities to commence some of the information preparation prior to the actual registration period.

> **Recommendation 4**:
> Retain the overall period of 70 days. With a 28 day pre-registration period, this reduces the registration period from 56 days to 42 days. If agreement is reached early within the pre-registration period, and the registration submitted after 14 days, then the overall period could reduce to 56 days.

5.13   It is an operator's right to register a service and if they hold a valid licence to do so, and there are no issues regarding the safety of the public, then they should be able to do so.

5.14   Although some authorities suggested that they would like to be able to veto a registration, this does not seem appropriate as it would impact on the commercial decisions of operators.

5.15   The Traffic Commissioner is a regulator, with the aim of maintaining safety standards within the industry. Therefore, it should continue to accept a registration if the operator meets the requirements to operate that service. The Traffic Commissioner can already issue Traffic Regulation Conditions to a PSV operator's licence if it is thought that they are needed to stop danger to road users or reduce severe traffic congestions, noise or air pollution in a particular area. This should continue as present.

5.16   Stakeholders agreed that these powers are sufficient and there should be no change to the remit of the Traffic Commissioner.

> **Recommendation 5**:
> The powers and remit of the Traffic Commissioner should remain the same as present.

5.17   The research highlighted a number of issues regarding EBSR and suggestions for improvement. However, it was not considered that EBSR should be linked with any changes to the registration process or that the process should be different for operators submitting registrations through EBSR.

Recommendation 6:
EBSR should not be linked with changes to the registration process, or have any bearing on the length of the registration process.

6. **Bus registration guidance**

Pre-registration

6.1   All operators planning to register a new service, a change to an existing service, or deregistering a service must consult with the public transport authorities through which the service operates, 28 days before submitting the registration to the Traffic Commissioner. The term 'consult' means to provide information, discuss, consider and action matters agreed by both parties.

6.2   The consultation process should include the following steps and adhere to the following time frames.

Day 1: The operator sends the registration document, along with associated timetables and maps, to the public transport authority, who issues an email of receipt.

Days 2-14: The authority considers the content of the registration, highlighting any mistakes, and identifying potential changes that would benefit the community. Where potential changes have been identified, or a particular issue arises, a meeting should be held with the operator to discuss these. The authority should consider whether:

(i)   The service/changes are complementary to the current network.
(ii)   A supported socially necessary service would be required.
(iii)   The registration would cause concerns for safety or uncompetitive practices.
(iv)   The service could in practice operate as registered.
(v)   Another authority's view if the service is cross-boundary
(vi)   Any stance allocations have been agreed

In instances where services are being withdrawn, operators should automatically provide data on patronage, fares, revenue, concessionary fares reimbursement and profit and loss information to the transport authority. This should be treated confidentially and remain within the passenger transport team.

Days 15-27: The operator considers the comments from the authority and provides a counter response. Where applicable, the operator will make changes to the registration. The operator submits its final intended registration to all authorities through which the service operates.
If both the authority and operator agree, the operator should be permitted to submit the registration after the initial 14-day pre-registration period.

6.3   If agreement has not been reached within the pre-registration period, the operator is still able to submit the registration to the Traffic Commissioner. Unless this is an issue on which the Traffic Commissioner can intervene, the registration will be accepted by the Commissioner. The registration should include a confirmation from the local authority that it has been properly consulted. The authority also has the opportunity to highlight any concerns that were not resolved during the pre-registration period.

6.4   Confidentiality must be maintained through the pre-registration period, such that the transport authority does not, unless with the agreement of the operator, divulge the content of the registration to anyone else.

Registration

Day 28: The operator submits the registration to the Traffic Commissioner.

Day 29: The Traffic Commissioner confirms receipt of the registration to the operator.

Days 29-70 (or 15-56 if the registration is submitted after 14 days): The Traffic Commissioner considers the registration. If the transport authority has indicated that they have not been consulted or that they are not in agreement with the content, the Traffic Commissioner should examine the circumstances. The powers for refusing registrations will be restricted, as currently, to the following instances:

(i)   The operator does not hold a valid PSV operator's licence or community bus permit.

(ii)   The operator's licence has a condition on it which stops the operator running the type of service applied for.

(iii)   The service runs in an area covered by a Quality Contract, unless it is exempt for the Quality Contract.

(iv)   Where the registration document has not been completed properly or the fee has not been enclosed, in which case the Traffic Commissioner can seek additional information and the fee from the operator.

In addition, the Traffic Commissioner may attach Traffic Regulation Conditions (TRCs) to the PSV operator's licence if it is thought that they are needed to stop danger to road users or reduce severe traffic congestions, noise or air pollution in a particular area. Conditions can affect:

(i)   Stopping places

(ii)   The times vehicles may stop and for how long

(iii)   Routes of services

(iv)   Turning or reversing manoeuvres vehicles may take

(v)   The number of vehicles or frequency.

The request for TRCs would normally come from a transport authority. The Traffic Commissioner should consider evidence and cases from both the authority and operator before considering whether a TRC should be attached and the detail of the TRC.

In the spirit of good partnership working, authorities should not raise any issues with the Traffic Commissioner that they have not already raised with operators during the pre-registration period.

6.5   Throughout, the aim should be for good data accuracy and adherence to timescales.

Registration form

6.6   The form should be amended to allow for more information on the consultation undertaken with the transport authority to be recorded. As a minimum, the form should show all authorities that the service passes through, whether they have been consulted, the date they were informed of the registration, the date of response from the authority, the date of any amendments and boxes to indicate whether or not the authority supports the content, and if not, a reason why not. Where a registration has been submitted without agreement from the authority, this should be clearly stated and a reason for this disagreement given from the authority. The authority should also be able to state whether requested information was not supplied by the operator.

EBSR

6.7   EBSR should be encouraged for all operators and could be incentivised by offering discounts for electronic registrations.

6.8   The electronic form should be re-designed with the additional requirements of the paper registration relating to the consultation process, and should distinguish between the English and Scottish processes. Better functions to allow for variances and allow registration of DRT services by enabling the detailing of operational catchment areas, should be developed.

6.9   The form should have the ability to identify the changes where a change in registration has been submitted. This could be done by electronically identifying changes by linking with the previous registration, or by way of manual input, as per the paper form.

6.10   The system could be improved greatly with better mapping capabilities and text route description, better printing capabilities, and the ability to attach files.

6.11   In comparison with the current process, the following is a SWOT analysis of the proposed system:

Proposed System

Strengths	Weakness
• Encourages dialogue and information sharing • More meaningful discussions between PTA and operators • Improved accuracy of registrations • Better service outcomes for users • Encourages agreement • Promotes 'partnership' • Provides greater structure to process	• No sanctions for inadequate engagement / consultation • Doesn't address issues surrounding EBSR or its wider introduction
Opportunities • For more effective joint working • Incentive to work together to reduce registration time by agreement	**Threats** • No benefits if parties fail to embrace spirit of partnership and co-operation

7. **Conclusion**

7.1   Bus registrations are central to maintaining order over what bus services are available and how and when they operate. The system brings formality to the development and provision of bus services. Therefore, care needs to be taken in how the system is developed, with a balance needed between the interests of the parties involved and to provide confidence for bus users.

7.2   Therefore, it has been important to involve stakeholders in this research to consider potential changes to the system. There is general agreement that the current system works well and manages to strike the right balance. However, stakeholders did see certain benefits in further amending and refining processes in line with the suggestions made in the consultation document circulated last autumn, provided that these contributed to better partnership working and improved services and did not increase bureaucracy or timescales.

7.3   The recommendations and associated guidance within this report have sought to strike the right balance, facilitating more up-front consultation and discussion with the aim of ensuring a smoother registration process and efficiencies in the provision of high quality, accurate passenger information.

Appendix A – Topic Guides

Bus registration process in Scotland
Discussion guide for bus operators

JMP has been commissioned by Transport Scotland to carry out research with the aims of:

- Identifying good partnership working between bus operators and local transport authorities.
- Developing best practice guidance for the bus registration process, taking account of a strengthening of the pre-registration discussions between operators and local transport authorities and the ability for concerns to be raised with the Traffic Commissioner.
- Identifying barriers to the use and take-up of Electronic Bus Service Registration (EBSR).

These issues will be explored by posing a number of questions, either for answering during a series of workshops, or by making written submissions directly to JMP by 24 April 2015. These should be sent to Chris Blake at christopher.blake@jmp.co.uk

General partnership working	
1.	In what ways do you work in partnership with local authorities?
2.	What has partnership working achieved in your area?
3.	What factors make for a successful partnership?
Bus registrations	
4.	Describe your current approach to dealing with bus registrations (from notification to the local authority through to service start and passenger information provision). To what extent do you currently engage with local authorities on your proposed service changes prior to registering them? What format do you use to submit registrations and accompanying timetables, maps and route descriptions?
5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?
6.	If operators have a duty to 'consult', rather than 'notify', authorities, what should the 'consultation' involve? Should it include wider interested parties, such as user representatives? Should you be required to provide usage data where appropriate?
7.	Which 'relevant authorities' should be party to the pre-registration consultation?

8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised by local authorities? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period?
9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator first?
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take?

Electronic Bus Service Registration (EBSR)

13.	If you have any direct experience of EBSR, describe your thoughts on the system.
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?
15.	What elements would you expect any improved system to provide?

Examples of good practice

We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.

**Bus registration process in Scotland
Discussion guide for local authorities / RTPs**

JMP has been commissioned by Transport Scotland to carry out research with the aims of:

- Identifying good partnership working between bus operators and local transport authorities.
- Developing best practice guidance for the bus registration process, taking account of a strengthening of the pre-registration discussions between operators and local transport authorities and the ability for concerns to be raised with the Traffic Commissioner.
- Identifying barriers to the use and take-up of Electronic Bus Service Registration (EBSR).

These issues will be explored by posing a number of questions, either for answering during a series of workshops, or by making written submissions directly to JMP by 24 April 2015. These should be sent to Chris Blake at christopher.blake@jmp.co.uk

	General partnership working
1.	In what ways do you work in partnership with bus operators?
2.	What has partnership working achieved in your area?
3.	What factors make for a successful partnership?
	Bus registrations
4.	Describe your current approach to dealing with bus registrations (from notification by the operator through to service start and passenger information provision). Do operators currently discuss (rather than notify) their intentions with you before registering? What format do operators submit registrations?
5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?
6.	If operators have a duty to 'consult', rather than 'notify', authorities, what should 'consult' involve? Should it include wider interested parties, such as user representatives? Should operators be required to provide usage data where appropriate?
7.	Which 'relevant authorities' should be party to the pre-registration consultation?
8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period?

9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator?
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take?

Electronic Bus Service Registration (EBSR)

13.	If you have any direct experience of EBSR, describe your thoughts on the system.
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?
15.	What elements would you expect any improved system to provide?

Examples of good practice

We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.

Bus registration process in Scotland
Discussion guide for other interested parties

JMP has been commissioned by Transport Scotland to carry out research with the aims of:

- Identifying good partnership working between bus operators and local transport authorities.
- Developing best practice guidance for the bus registration process, taking account of a strengthening of the pre-registration discussions between operators and local transport authorities and the ability for concerns to be raised with the Traffic Commissioner.
- Identifying barriers to the use and take-up of Electronic Bus Service Registration (EBSR).

These issues will be explored by posing a number of questions, either for answering during a series of workshops, or by making written submissions directly to JMP by 24 April 2015. These should be sent to Chris Blake at christopher.blake@jmp.co.uk

	General partnership working
1.	Where have you seen good partnership working in place regarding bus service provision?
2.	What evidence is there that partnership working achieves better bus services?
3.	What factors make for a successful partnership?
	Bus registrations
4.	Do you have any comments on the current bus service registration process?
5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?
6.	If operators have a duty to 'consult', rather than 'notify', authorities on service registrations, what should the 'consultation' involve? Should it include wider interested parties, such as user representatives? Should there be a requirement for operators to provide usage data to authorities where appropriate?
7.	Which 'relevant authorities' should be party to the pre-registration consultation?
8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised by local authorities? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period?

9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator first?
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this?

Electronic Bus Service Registration (EBSR)

13.	If you have any direct experience of EBSR, describe your thoughts on the system.
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?
15.	What elements would you expect any improved system to provide?

Examples of good practice

We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.

Appendix B – Meeting notes

14/04/15
Attendees:
John Elliot (Traveline Scotland – Chief Executive)
Fraser Smith (CityLink – Commercial Manager)
Chas Allen (Data Manager – Stagecoach UK)

General partnership working		
1.	In what ways do you work in partnership with local authorities?	
	'Relationships' rather than 'partnerships'. - Being pre-emptive and proactive leads to a better relationship. - Trust is very important. - Having dedicated contacts and regular contact helps develop relationships. - Relationships are more difficult with PTEs as they are larger and more difficult to find who you need to speak to for a certain issue; LAs tend to be more flexible. - In some instances the relationship with the LA is good and the level of trust enables the operator to float ideas.	
2.	What has partnership working achieved in your area?	
	- More efficient working and a coordinated approach in some areas. - There are partnership agreements which allow, for instance, a certain number of service changes per year.	
3.	What factors make for a successful partnership?	
	- Obligations on both parties; tend to be more formal. - Working together to find a middle ground. - The personality of the people involved.	
	Other comments on partnership	
	- The flow of information between the Local Authorities and operators is poor. LAs don't consult with operators. The PT Strategy states there is a statutory duty to consult. - PTE departments are very segregated and they don't appear to consult with each other, so operators need to consult with different departments for different things.	
Bus registrations		
4.	Describe your current approach to dealing with bus registrations (from notification to the local authority through to service start and passenger information provision). To what extent do you currently engage with local authorities on your proposed service changes prior to registering them? What format do you use to submit registrations and accompanying timetables, maps and route descriptions?	
	- Operator actively lets the LA know with the shortest amount of time possible as information is often leaked. - Any issues LAs have with the proposed service are often not picked up	

		until 1 or 2 days before the end of the 14 day notification period. Operators need to consistently chase some LAs for the acknowledgement required to submit the registration.
	•	Short Notice changes are often caused by TRO's or late awards of tenders Operator has to allow up to 21 days to consult with the unions about changes, therefore duty and roster compilation often needs to start immediately after registration. Some PTEs have set times for timetable changes and/or are linked to the financial year.
	•	Most people work within the timescales.
5.		If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?
	•	It would allow the LAs more time when there are large network reviews by operators.
	•	Currently, because it is confidential, 14 days are 'frozen' at the detriment to passengers.
	•	The largest element of time required by the LA is to determine what changes have occurred. This can be reduced if the operators submit a statement of change, and the 14 days should suffice. Detail is not currently provided in the 'change' box on the form as it is published in the Ts and Cs and operators do not want the detail to be seen.
6.		If operators have a duty to 'consult' rather than 'notify' authorities, what should the 'consultation' involve? Should it include wider interested parties, such as user representatives? Should you be required to provide usage data where appropriate?
	•	There was a concern about what consultation actually involved, and what constraints would be placed on LA's as many think the current system gives them right of veto on proposed changes. It is the operator's prerogative to make a commercial decision which may run counter to objections from the LA, and for the LA to acknowledge in a timely manner that the consultation has taken place.
	•	It was questioned that, if there is too much consultation, would anything be progressed?
	•	There should be no expectation that commercial data should be supplied, only if a service was being de-registered and the LA needed the information for tendering.
7.		Which 'relevant authorities' should be party to the pre-registration consultation?
	•	Local Transport Authority only. Any wider consultation could result in conflicts of opinion.
8.		What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised by local authorities? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality?

	Who should be party to any discussions within the 28 day period?
	- There should be a cut-off date as operators need time to make any changes. - Operators should be able to counter-response. - Confidentiality should be formal so operators could sue if confidentiality was broken. - Discussions should only be with official in the transport department of the LA.
9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if, on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator first?
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?
	Issues relating to safety or a breach of traffic regulation issues. There is no need for action relating to predatory registrations as the Competition Commission is already in place for this, it is not a matter for the Traffic Commissioner.
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?
	None. They form an administrative function. They should not decline a registration because of the substance.
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take?
	- Traveline require 28 days to give a target of 14 days notice to the public about changes. - The information comes from the operator to Traveline either directly or via the LA. Any errors are picked up with the operator. - The quantum of de-minimis services would need to be extended if the registration time is reduced. - There was a reluctance to increase the overall period of the registration process as this may act against passengers' interests by delaying the implementation of changes.

	Electronic Bus Service Registration (EBSR)
13.	If you have any direct experience of EBSR, describe your thoughts on the system.
	- A lot of information needs to be loaded up front. - The information needs to be correct as everything feeds off the one TransXchange file such as timetables, web information and Traveline. With paper registrations, mistakes can be rectified retrospectively. Traveline can accept electronic data through CIF, so doesn't rely on EBSR. - It does not mean the registration is correct if it passes through the Schemer - Once you use EBSR, you cannot revert back to using paper registrations.
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?
	- Routes and timings are put into the EBSR system prior to registration, allowing for minor amendments in one location. Previously if an error was made it would need to be rectified across several sets of data. - Using one system for multiple applications reduces errors produced by multiple manual input and intervention. - It can be an issue to raise a new NAPTAN code with the LA; these are required for every stop on the route. - Small operators would most likely require an agent to handle ESBR for them. Suggested organisations could be the LAs or PTE. - The production of TransXchange files has multiple benefits, however within scheduling systems you have to pay for an additional bolt-ons to produce these. Some operators produce TransXchange files, but do not use them for EBSR. - There is a financial cost of switching to the EBSR system which many operators cannot afford. It is easier for larger companies. - It was felt that there may be some resistance from operators when the main beneficiary of the system is VOSA and the Traffic Commissioner, and operators see little benefit of using it. - EBSR reduces paperwork and it allows a bulk export. It also means that registrations can be sent at any time, and gets rid of the cost and hassle of postage. - EBSR makes the acknowledgement process quicker from the LAs.
15.	What elements would you expect any improved system to provide?
	- There is a misconception within Government that the system is straightforward. - There should be a 'statement of change' included in the system, or some way of identifying changes. - Sometimes the barriers to ESBR are an internal problem for the bus operator.

	• A reduced cost to operators.
	• An automated text description of the route.
	• Improved map quality.
Examples of good practice	
We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.	

14/04/15

Attendees:

Douglas Blades / Martin Arnold (Argyll & Bute Council)

Kenny MacNaughton (Dundee Council)

David Brown / Graham Wilson (Stirling & Clackmannanshire Councils)

Robin O'Malley (East Dumbarton Council)

Graham Senior (Ayrshire Roads Alliance)

Gordon Dickson / Donald Booth / Frank Rennie / Ronnie Park / Michael Milton / Bryan Tennant (SPT)

General partnership working	
1.	In what ways do you work in partnership with bus operators?
	• Good working relationships have helped to bridge the gap where operators have decided to withdraw services. The good relationship is based on trust and confidentiality.
	• SPT consult on a regular basis with operators and provide them with information (not only on a statutory basis). It was felt that having the same contact for operators within SPT was not essential for operators and has not caused a problem forming relationships with them. Special meetings are held for the planning of major events and initiatives.
	• Stirling & Clackmannanshire have meetings twice a year, but these are becoming less frequent. The LA is in constant contact with operators and the operators will raise concerns.
	• Argyll & Bute have frequent meetings. The attendance at the meetings depends on the topic and the likelihood of a lively debate.
	• SPT are involved with Statutory Quality Partnerships. These would not necessarily be suitable for smaller LAs as it requires resources and investment.
	• SPT has monthly meetings to discuss resources, which has the backing of the Board. It was primarily created to manage air quality issues, however it has a wider aim of improving standards.
2.	What has partnership working achieved in your area?
	• Partnerships have evolved due to the reduced number of operators over recent years. There has previously been a more cautious approach to competition in the past, but now there are less people to provide resources.
	• There has been the creation of Statutory Quality Partnerships.

	- The Inverclyde Fastlink SQP has helped to raise standards and give the operators a level playing field with SPT. - Increased pressure for more LEVs. - It was considered that many operators feel that they can approach the LA/PTE and ask for improvements to infrastructure. - SPT has the statutory agreement to coordinate information and would update the bus stops. Operators have to contribute towards the cost. - In some areas the LA manages this process and operators are not allowed to put up their own information. - Joint working between the NHS / SPT and operators helped with the planning of services to support journeys to the New South Glasgow hospital.
3.	What factors make for a successful partnership?
	- Mutual respect - Shared goals - Knowledge of each other's desired outcomes - Trust - Joint approach to problem solving - Resources, and an acceptance that there is a need to resource. - Accountability - A source of support - Avoid conflict within the same organisation. - An understanding of how all organisations in the partnerships with benefit.
	Other comments
	- Some operators do not engage, which can cause a problem (for example, with stop allocations). - Cuts to BSOG and the concessionary fares scheme have strained relationships at times. - Care needs to be taken to ensure partnership does not evolve into collusion.
Bus registrations	
4.	Describe your current approach to dealing with bus registrations (from notification by the operator through to service start and passenger information provision). Do operators currently discuss (rather than notify) their intentions with you before registering? What format do operators submit registrations?
	SPT - Information provided during the notification period is kept confidential. - SPT are willing to provide guidance for new services. - Most registrations come in on paper (routes, timetables, some poor information) - EBSR has streamlined the process, but it is not used very much. - Provide feedback to operators and inform stakeholders. - There is a process map for a variation or cancellation of a registration.

		With new registrations the notification period is used to pick up on errors. Process includes the suitability of stops, update of information, and assess the timetable against current service (e.g. with departure points in bus stations).
		• Would like to be able to provide advice to operators in how to make routes more financially viable.
		Stirling & Clackmannanshire
		• Use the 14 day period to inform key stakeholders when services are being withdrawn. Most notifications received are about reducing or withdrawing a service.
		• This period should be used, when services are being withdrawn, for the LA/PTE to understand the reasons why.
		• LA would like to be approached for their views.
5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?	
		• SPT believe that 28 days is not long enough. More time should be allowed to inform and review plans when services are reduced or withdrawn.
		• Changes are often restricted by committee dates.
		• SPT would only inform Members during the 14 or 28 days.
		• S&C felt that 14 days was previously more appropriate and a temporary fix could be afforded. The 14 day period now is usually used to notify of a reduction in services and gives little time for a temporary solution to be put in place, for example consultation with other operators.
		• If the period was 28 day they would use the period, where services are being withdrawn, to inform local stakeholders (for example, Community Councils). It was felt that the information should not be held back when it would affect the communities they service. Should be made available at the discretion of the LA / PTE. Commercially sensitive information otherwise should be kept confidential.
		• Currently 7 days should be long enough to provide feedback to operators, allowing 7 days for a counter response.
6.	If operators have a duty to 'consult, rather than 'notify' authorities, what should 'consult' involve? Should it include wider interested parties, such as user representatives? Should operators be required to provide usage data where appropriate?	
		• SPT felt that consultation is key when registering / deregistering services.
		• The operator should be asked to provide patronage data when reducing services. Is there a role for a subsidised service? Time needs to be allowed to consider when a subsidised service is viable based on previous experience, or allow time to find the best price to a subsidised service / have a de-minimus payment put in place.
7.	Which 'relevant authorities' should be party to the pre-registration consultation?	

8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period?
	• Operators should have an opportunity to make a counter-response. • There should be a code of conduct for confidentiality.
9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator?
	• It was suggested that any concerns currently raised with the TC are not picked up. It is unlikely that issues will be picked up unless there is an error on the registration or there is a safety issue. • The LAs and PTEs undertake a more rigorous check of the registrations. • Cross boundary services require a comparison of information across different areas by the LAs/PTE.
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?
	Before submission to the Traffic Commissioner the LA/PTE could confirm that consultation has taken place.
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take?
	• SPT would be happy for the period to be reduced from 56 to 42 days. • The TC needs less time to process EBSRs than paper ones. • The length of time at the end of the process is more crucial for Traveline.
Electronic Bus Service Registration (EBSR)	
13.	If you have any direct experience of EBSR, describe your thoughts on the system.
	• The system streamlines the process for LAs/PTEs

14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?
	• The system requires an agent or similar body for smaller operators to use. • The main benefit of the system is for VOSA / LAs / PTEs with the management of electronic data. • The electronic system reduces the amount of data being keyed in. • It is difficult to work out the amendments when variations are made to services. The electronic system produces a full timetable regardless of how many changes have been made. • The new system requires information to be inputted at a stop-by-stop level, which is more detailed than the paper system. • Large quantities of new registrations / variations can still be difficult to check within the 14 day period. They may have to be pushed through without the usual level of interrogation.
15.	What elements would you expect any improved system to provide?
	• Better maps • Text route description • Improved receipt process • Subsidised software costs • Alternative system should be designed for smaller operators to use, e.g. through an agent / PTE / LA • With the electronic system the Traffic Commissioner does not ask for comments. • The system needs to recognise the difference between the systems in England and Scotland. • EBSR should be able to identify public holidays so less manual intervention is required by local authorities to put onto their systems.

Examples of good practice

We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.

15/04/15
Attendees:
Andrew McLellan (East Lothian)
Karl Vanters (Midlothian)
Chris Cox (Falkirk)
Chris Day / Graham Atkins / Rebecca Chan (City of Edinburgh)
Bob Baillie / Gillian Watson (Fife)

	General partnership working
1.	In what ways do you work in partnership with bus operators?
	- East Lothian Bus Forum. This includes operators, the Council, local councillors and community / stakeholder organisations. It is a more strategic partnership. The partnership has produced route network diagrams, combined ticketing information and the introduction of smart cards. The forum takes place twice a year, but the Council meet with operators on a more regular basis. The results have shown increased usage on rural routes because of better bus stop information, and an increase in patronage has encouraged operators to invest in different and larger vehicles. - It was mentioned that some Local Authorities have conversations with Abellio ScotRail to discuss plans around tourism and events.
2.	What has partnership working achieved in your area?
	- Discussions around pollution have taken place to improve air quality by improving the fleet. - The operators feel that they are receiving the same quality of information and it is more of a level playing field for them. - Innovation, such as combining community transport with delivering school meals, Home-to-school transport. - In Falkirk, as there is limited competition, the operators meetings only include First and the school transport operators. - Midlothian described how they had recently seen more ideas come forward from operators. It is in the interest of the Council to have a good working relationship with First as there is a threat if they withdraw. - It was mentioned that Local Authorities are increasingly making decisions about bus routes because of the withdrawal of commercial services. - Would like to see better partnerships to prevent the overlap of routes and therefore create a wider network.
3.	What factors make for a successful partnership?
	- Confidentiality – some LAs mentioned that they keep all information confidential during the 14 day notification period. - Clear communication - Trust with commercially sensitive information - Clear objectives

		• Some common goals • Realism • A willingness to be involved • Good individual working relationship is important between people. • Edinburgh described a better 'relationship' with Lothian Buses because there is trust and the relationship is more informal. It was suggested that Lothian Buses are under less commercial pressure and are more likely to be influenced by politics.
	Other comments	
		• Some operators do not engage, which can cause a problem (for example, with stop allocations). • Cuts to BSOG and the concessionary fares scheme have strained relationships at times. • Care needs to be taken to ensure partnership does not evolve into collusion.
Bus registrations		
4.	Describe your current approach to dealing with bus registrations (from notification by the operator through to service start and passenger information provision). Do operators currently discuss (rather than notify) their intentions with you before registering? What format do operators submit registrations?	
		• East Lothian – encourages two revision periods a year and start receiving information up to four months before. All information is received 70 before service implementation. During the consultation period, a meeting with the operator would usually be arranged during the second week. Before this the LA will check for errors and then propose any amendments. The revised information is then received at 56 days with an executive summary. All information is kept confidential unless otherwise arranged. Operators are aware that, if services are withdrawn in East Lothian, there is no money to subsidise it. Does allow for some use of DRT. • Falkirk – at day -70 the Council receives the information, but there are unlikely to be any changes at this stage. It is fully confidential and there is no consultation. It will only be considered to prevent re-printing of timetables if they are scheduled for print. The 70 days does allow the Council to consider its options around subsidised services, which is most likely to involve a diversion of an existing service if it make sense to do so. • Fife are given some unofficial notice prior to 70 days and do meet with operators during the notification period. Most issues are ironed out by 56 days. • With notice at 56 days there is little opportunity to replace services in time and approval is restricted by committee dates. • There are no specifics listed about what has changed on a registration, and the level of additional information provided depends on the individuals.

5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?

	• If it was extended to 28 days it would need to include meaningful consultation and not be confidential. Would the operators take any notice of the consultation? There could be a code of practice for consultation.
	 • It would allow more time to deal with large network reviews, for example the large withdrawals in Falkirk and Midlothian.
	 • A timetable was suggested for the 28 days:
	  1. Meeting with the operator
	  2. Council to respond
	  3. Right to response from the operators
	  4. Produce a plan for the future (which could include a short notice tender)

6.	If operators have a duty to 'consult, rather than 'notify' authorities, what should 'consult' involve? Should it include wider interested parties, such as user representatives? Should operators be required to provide usage data where appropriate?
	• Would the operators take any notice of the consultation? There could be a code of practice for consultation. Should it even be a consultation period? • It was questioned whether the additional 28 days would achieve anything. • Edinburgh raised that it would still not be enough time to get anything passed by Committee. • ETM data should be shared by operators.
7.	Which 'relevant authorities' should be party to the pre-registration consultation?
	• It was suggested that the consultation should not involve the public as most of the changes to registrations are negative and would only prompt negative responses. Community Councils and the LAs could be consultees. It was commented that the LAs may be in a vulnerable position if formal consultation was undertaken.
8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period?
9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services?

	Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator?	
	- When small operators register unreliable services. - Frequent services and concerns with layover / departure slots. - Numbering issues (i.e. different routes numbered the same). - If concerns were to be raised there should be a process for doing so. - There could be legal action if the LA interferes in a commercial market.	
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?	
	- Conditions could be applied as a Traffic Conditions. - There could be a problem with accountability if powers are increased for the Traffic Commissioner.	
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?	
	Could there be a regulator similar to the rail industry?	
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take?	
	There can be a gap in services currently if the TC does not approve short-notice registrations (between withdrawals of services and the registration of subsidised services). Would need further use of EBSR to move towards 42 days.	
Electronic Bus Service Registration (EBSR)		
13.	If you have any direct experience of EBSR, describe your thoughts on the system.	
	Stagecoach is the only user of EBSR for most LAs.	
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?	
	- Using EBSR should reduce the period of time registrations take. - The variations are not clear on the registrations – has to be looked for.	
15.	What elements would you expect any improved system to provide?	
	- Make it easier to maximise the benefits of the datasets e.g. apps and web-based material. - Improved maps. - Better system for smaller operators as not many LAs have the	

| | | resources to manage EBSR for those who cannot currently afford the technology. This would be a web-based registration system. There should be a move for operators to move onto electronic registrations. |
| | • | Split registrations require some manual work to check. |

Examples of good practice		
We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.		

15/04/15
Attendees:
John Scott (First Scotland East)
Douglas King (Stagecoach)
Andrew Shaw (National Express Dundee)
Jim Gardner (National Express Dundee)

General partnership working		
1.	In what ways do you work in partnership with local authorities?	
	•	There are some formal and informal partnerships.
	•	The relationship with different LAs is variable.
	•	Relationships are dependent on personalities and resources at the LA.
	•	Stagecoach meet with LA three or four times a year to discuss route changes / patronage / constraints. Highlight minor amendments, reductions and new services, for example where a new service might require new infrastructure.
	•	QC between FirstGroup and West Lothian.
	•	'Punctuality Improvement Partnership' in Dundee.
	•	'East Lothian Charter'
2.	What has partnership working achieved in your area?	
	•	Some partnerships have not always delivered for both sides.
	•	It can be difficult to get certain tasks done, mainly due to the lack of funding (for example, moving a bus stop). Sometimes changes are discussed, but the LA will not always follow through with it.
	•	'One Ticket' is a multi-operator ticketing product which is managed through SESTRAN.
	•	The QC in West Lothian was not honoured by the LA.
	•	The 'East Lothian Charter' has looked at frequency alignments, the provision of information at bus stops, and a coordinated website. The Bus Forum is useful, but things that are discussed as being good ideas are not always followed up. Staff changes do not help with progressing actions.
3.	What factors make for a successful partnership?	
	•	Two-way working

		• Both parties should contribute something • Shared goals • Trust and confidentiality • Effective communication
	Other comments on partnership	
		• Some LAs and operators share ideas about new services / changes. • Any new services serving new developments are likely to come from the developer as part of their statutory obligations. It was intimated that the LA only get involved later on in the process and the developer is 'ticking a box'. As the operators have little involvement it is often too late when they are asked to consider operating in an area, for example the roads are too narrow, or the service is unlikely to match the demands of the residents. • Lack of information sharing and integration within some LAs, for example regarding roadworks where information is not circulated. It was understood that the Roads Departments in some LAs do not speak to the Passenger Transport teams to pass on the information.
Bus registrations		
4.	Describe your current approach to dealing with bus registrations (from notification to the local authority through to service start and passenger information provision). To what extent do you currently engage with local authorities on your proposed service changes prior to registering them? What format do you use to submit registrations and accompanying timetables, maps and route descriptions?	

		• Current process
		  o Build timetables (with prior talks with the LA depending on what changes are being made)
		  o Submit to LA
		  o LA will come back to the operator with any comments – some LAs will make suggestions, e.g., altering times to connect with other services.
		  o Submit to Traffic Commissioner
		• There is often little notice, sometimes only a couple of days, when tenders are awarded through short notice registrations. The same applies when services are withdrawn.
		• It was commented that short notice registrations are very rarely commercially driven but as a consequence of LA actions such as tendered services or roadworks.

5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring?	
		• One operator said that they are happy to increase the time to 28 days, but would not want to extend the total time. • Concern was raised that increasing to 28 days would just prolong the

	time process, with LAs not undertaking more work in the pre-registration period, just delaying the current level of work and therefore not improve the process. • Concern was raised that the longer period would increase the likelihood of confidentiality being breached. • One operator suggested that the 56 days is required to allow them time to do all the necessary planning, including schedule development, staff duties and union consultation, although it was considered that using EBSR would enable this time to be reduced. • The main issue with not wanting a longer overall registration time period was the ability to react to commercial situations. If a service is losing money, an additional 14 days to deregister the service would mean an additional 14 days of lost revenue. It was suggested that different rules could be applied to deregistrations than to registration of new services
6.	If operators have a duty to 'consult' rather than 'notify' authorities, what should the 'consultation' involve? Should it include wider interested parties, such as user representatives? Should you be required to provide usage data where appropriate?
	• There was concern that 'consultation' could be a lengthy process and it depends on what the consultation involves. If it involves sharing information, allowing the LA to review and respond and discuss potential changes then this is already being done. However, the final decisions are made by the operator regardless of the LA's position on some points. • Should remain a 'notification period' if 'consultation' involves speaking to a wider audience and/or there was a requirement of the operator to make changes. • It could be possible to provide more details to the LAs at the start of the 14 days. • Still a need for confidentiality and details should not be discussed with elected members unless it is agreed to. Information is regularly leaked from some LAs.
7.	Which 'relevant authorities' should be party to the pre-registration consultation?
	• The Transport team of the LA only.
8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised by local authorities? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period?
	• There is nothing additional to what is currently taking place, apart from perhaps giving more information to the LA. • One of the few instances where the LA can have a say is on the departure times at bus stations where slots may not be available. It would be expected to be covered in the 14 days.

9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if, on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator first?
	• The LA should not be able to raise issues with the Traffic Commissioner (except on grounds on safety) as it may be a delaying tactic, specifically when services are being de-registered. • Anything that the LA raises should be able to be sorted in the pre-registration stage, and not left until the end of the notification period. • The detail and registration of services should be a commercial decision and not altered for the simplicity of the LA. Traffic Commissioners should not have the authority to refuse registrations, their role is regulatory one, checking the services are operating in line with the registrations.
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken?
	• The fact of whether or not consultation has occurred is sufficiently covered on the registration form already, providing more detail is unnecessary.
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers?
	• The Traffic Commissioner should not deny registration on any grounds. • Operators felt that it was unlikely the Traffic Commissioner would pick up any errors, however it would be good to check the registrations for irresponsible operators.
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take?
	• One operator said that they would be happy to reduce the figure to 42 days. • One operator suggested that they require 56 days to complete their planning. • Any extra time in the de-registration process would be unwelcomed for loss-making services.
	Other comments

	- One operator said that they were happy to provide data when services are being de-registered, including revenue figures, however it would only be for internal use at the LA. - One operator said that they would only be willing to provide patronage figures.
Electronic Bus Service Registration (EBSR)	
13.	If you have any direct experience of EBSR, describe your thoughts on the system.
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do?
	- The cost of the software is a barrier to EBSR. The system should be made electronic, but there should be support for smaller operators (exemption or assistance with the system). This raised the following questions: - Should it be free? - If support is provided to smaller operators, when does a small operator become a large operator? - Should the registration fee be lower if you are doing them online rather than on paper? - Omnibus provides the necessarily support for many aspects of operators, however to create TransXChange files an add-on to the system is required. This has an additional cost. - The EBRS does bring all information into one place, therefore amendments to timings are only required in one place. This has a time saving, reduces repetition and helps with accuracy. - No paper - No real benefits to operators in the registration process, but TransXChange files are useful for other processes. - The data can feed straight into the RTI / bus stop information systems.
15.	What elements would you expect any improved system to provide?
	- The system does not cope well with variations (e.g. holiday dates). - The maps are poor. - When timetables are printed they are not easy to analyse across many pages. - There are too many timing points. - It is easy to make amendments to services once they are in the system. - There is no sensible electronic notification process. - The system does not distinguish between the differences between the English and Scottish processes. - You cannot attach files to submissions.
Examples of good practice	
We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.	

16/04/15
Attendees:
Mark Yule (Aberdeen City Council)
Ivor Souter (Highland Council)
Laura Carpenter (Highland Council)
Chris Hall (The Moray Council)
Donald MacRae (The Moray Council)
Julie Cromarty (HITRANS)
Sheila Fletcher (CTA)
Hussein Patwa (MACS)
Sean Jamieson (Stagecoach)
Alisdair Goodall (Stagecoach)

	General partnership working
1.	In what ways do you work in partnership with bus operators? General comments: HITRANS/Aberdeenshire Council/Aberdeen City Council/Stagecoach all considered that day to day working relationships are productive and there is an overall positive approach to collaborative working in the region. Aberdeen City Council hosts a monthly forum with operators and a Bus Punctuality Improvement Partnership exists which generates good dialogue between LA and operators. Although the CT sector fills gaps in scheduled bus service provision, the Community Transport Association considers that current legislation doesn't permit CT operators to work in true partnerships with LAs/bus operators. However, one good example is in Helmsdale where Stagecoach funds a local CT scheme to provide a feeder to its commercial service. This has enabled local people to access further education and employment.
2.	What has partnership working achieved in your area?
3.	What factors make for a successful partnership? Productive working relationships and trust between partners.
	Bus registrations
4.	Describe your current approach to dealing with bus registrations (from notification by the operator through to service start and passenger information provision). Do operators currently discuss (rather than notify) their intentions with you before registering? What format do operators submit registrations? Stagecoach: Relevant Managing Director decides on changes to be made and delegate responsibility to local management to work up the details; passed back to MD for approval but then local staff undertake the follow-up

	notification/discussions with LAs. If the changes are considered to be contentious then informal discussions with LAs will often take place well in advance of 14 day period. Stagecoach notify LAs in writing, submitting a Word document containing written description of changes alongside Excel timetables, generated from Trapeze. Having to have a timing point at least every 15 minutes, can lead to the need to create 'artificial' timing points in more isolated areas. CTA: There is a disparity between registration periods for s22 operators – in England & Wales only 28 days notice is needed, but 56 days is required in Scotland. LAs: Relevant officers will review Stagecoach's submission in detail. This will include cognisance of a range of issues, including: connections to other relevant services, whether additional destinations can be served (e.g. to serve new housing/commercial developments), potential impact on subsidised services, or whether the proposed journey times are considered appropriate. If appropriate then face-to-face discussions will take place to discuss proposed changes, and LAs respond to Stagecoach in writing with their comments/any suggested changes. Registrations don't necessarily provide local authorities with the most meaningful information; TransXchange however provides a lot more detail. If a local authority is happy with a short notice registration, the Traffic Commissioner should accept it without question.
5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring? Stagecoach: Sometimes the pre-registration period is completed well within the 14 days. However in general it is insufficient; extending the period would ease pressure on all parties. Not all LAs respond to proposals put forward in good time. The limit of 14 days can create pressure particularly if LAs have suggested changes meaning that Excel timetables require revision. Often, proposed changes are not properly tracked and incorrect timetables are submitted with the registration. This then requires operators to contact the TC to request changes to the timetable, which impacts negatively on them. Stagecoach do recognise however that better internal checking and approvals processes would help overcome these issues.

	The 14 day period is often insufficient when multiple changes across a network are undertaken. At the time of the workshop, Stagecoach were working on 60 individual registrations which creates pressure on all parties to review, comment on, amend if necessary and submit.
6.	If operators have a duty to 'consult', rather than 'notify', authorities, what should 'consult' involve? All parties: Stagecoach already 'consult' as good working relationships exist between them and LAs. Stagecoach: If there was a requirement for 'formal' consultation there would need to be a change to legislation in the Transport Act 1985. Should it include wider interested parties, such as user representatives? Stagecoach: In the past, Stagecoach has undertaken public consultation on proposed changes, by consultation events and by publicising in the local press. Should operators be required to provide usage data where appropriate? Operators already do this where necessary.
7.	Which 'relevant authorities' should be party to the pre-registration consultation? All parties: Currently LAs but should also extend to RTPs. RTPs get sight of registrations via LAs.
8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised? Stagecoach: The 28 day period should be structured to have defined deadlines. Cut-off after 14 days for any issues to be raised by LAs (or at the very maximum 21 days if only minor tweaks are needed). But realistically, operators have already made their intentions known well in advance so any major concerns should have already been addressed well within the 14 days. For very contentious issues, suggest that LAs should first respond within 7 days. Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Stagecoach: Confidentiality not considered to be a major issue, but this is because they are the dominant operator in the area. This might not be the case in a multi-operator environment. Who should be party to any discussions within the 28 day period?

	LAs:
	LAs do discuss proposed changes with their elected members, generally through the existing pre-registration period and in advance of that. How this is done depends on the scale of the changes but generally informal discussions. Involving elected members/community councils can delay processes, even within the 28 day period, if needing to attend specific meetings or organise member briefing sessions.
9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator? Highland Council: LAs should have the opportunity to appeal to the TC if they feel that operators have submitted a registration without taking their concerns on board. However the need for this would be very rare in the Highlands and Islands area due to the fact that there is an open dialogue between Stagecoach and LAs. However this may be needed in other areas of Scotland where working relationships are not as productive, so a proviso within the system for LAs to be able to make representations to the TC. If a LA complains to the TC that they have not been properly consulted then the TC should be able to delay the service start date to enable time for consultation to take place.
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken? LAs already certify that this has been seen, or provide a letter of support for short notice registrations / variations.
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers? TC can already take certain action – this should remain as present. Some attendees commented that registrations should be handled by LAs rather than the TC.
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? What do you have to do during this period and how long do these actions take? Stagecoach: Would be against a reduction in the 56 days as there is still a significant

	amount of work involved during this period, both internally and externally. If EBSR can be improved alongside this then may be more willing to see reduced registration period.
Electronic Bus Service Registration (EBSR)	
13.	If you have any direct experience of EBSR, describe your thoughts on the system.
14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do? Stagecoach: EBSR is an integral part of all Stagecoach operations now. Benefits: for feeding information through to real time, timetable publication, etc Drawbacks: System is unreliable (therefore, can't leave submission to the last moment, in case there is an error), not all data transfers across properly, difficult to submit changes, mapping capabilities are limited. It is not clear who hosts the system.
15.	What elements would you expect any improved system to provide? All parties: Smaller operators/LAs/CT sector would require to use EBSR so infrequently that there is a skills/training issue; many will lack the confidence and ability to be able to use effectively. There are also cost implications as these users are not willing to invest in the scheduling systems to justify its use. Therefore, smaller operators are excluded from EBSR and without some kind of support from the Scottish Government there will always be two systems in use; paper forms and EBSR. Every operator needs to be using the system for it to be worthwhile. Therefore, consideration of how to do this is needed, e.g. for SG to finance the installation of relevant software for all operators and to fund training to equip operators with the skills to use. Local authorities could offer a back office service to assist small operators (Highland Council already assists small operators with their paper-based registrations). EBSR system should be capable of taking Excel-based information, so that operators do not need specialist software.
Examples of good practice	
We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.	

Additional comments:
Previously, the idea of having a number of set dates through the year for service changes has been raised. Given the pressure this would put on all concerned (operators, authorities, OTC), it was felt that it would be difficult to manage this.

17/04/15
Attendees:
Ralph Roberts (ALBUM)
Calum Aikman (Bus Users Scotland)
George Mair (CPT)
Paul White (CPT)
Audrey Dick / Phil Jowitt / Brian Torry (OTC)
Chris Hampson (First Glasgow)

	General partnership working
1.	Where have you seen good partnership working in place regarding bus service provision?
2.	What evidence is there that partnership working achieves better bus services?
3.	What factors make for a successful partnership? - CPT / ALBUM consider that much has been achieved through voluntary arrangements. - Aberdeen and Dundee - partnership working is viewed as successful. - Paisley SQP has been successful. - Fastlink partnership (including quality / emission standards) to be introduced later this year. - Good partnerships are based on open communication, 2-way dialogue, trust and commitment.
	Bus registrations
4.	Do you have any comments on the current bus service registration process? - Current process works well and operators often talk to authorities prior to the 14-day notification. CPT, ALBUM and First considered that the current system was not broken. - OTC usually receives prior notice of large scale changes from operators. - Some authorities are slow to come back to operators with any comments on proposed service changes (perhaps a day before the registration is due to be submitted). - Short notice registrations are often at the request of local authorities, rather than to suit operators. - UK-wide: 23% of registrations via EBSR (been at this level for 4 years).
5.	If the pre-registration period is extended from 14 to 28 days, what benefits will that bring? Will help formalise the process and ensure that greater consideration is given to proposed changes.

6.	If operators have a duty to 'consult', rather than 'notify', authorities on service registrations, what should the 'consultation' involve? Should it include wider interested parties, such as user representatives? Should there be a requirement for operators to provide usage data to authorities where appropriate? - Operators should consult with their users prior to developing their proposals; the formal 'consult' as part of the pre-registration process should be with the relevant local transport authorities. - The consultation should not mean that authorities can veto any proposed changes, or frustrate the commercial decisions of operators. - Operators consider that they already consult under current arrangements, rather than merely notify.
7.	Which 'relevant authorities' should be party to the pre-registration consultation? Relevant authorities should just mean those authorities with responsibility for public transport in the areas where service changes are being proposed
8.	What should happen within the 28 day 'consult' period? Should there be a cut-off time for concerns to be raised by local authorities? Should operators have an opportunity to make a counter-response? What should be the approach to issues of confidentiality? Who should be party to any discussions within the 28 day period? - Local authorities should be required to respond to operators by 14 days, to provide an opportunity for operators to provide a counter-response. - Operators would expect that authority officers would keep any information provided confidential; it should not be shared with elected members or others. - Bus Users' Scotland considered that it could have input into the consultation phase; CPT suggested that this would not be acceptable during the 28 day pre-registration period, although it would be fine to include them as part of any public consultation undertake prior to this.
9.	What sorts of concerns regarding the registration are appropriate for local authorities to raise with the Traffic Commissioner? What if on a cross-boundary service, one authority has concerns and the other doesn't? Should this apply to variations / withdrawals, as well as new services? Should authorities be able to raise concerns with the Traffic Commissioner that were not flagged up to the operator first? Operators felt that there should be no extension to the issues that could already be raised with the Traffic Commissioner (CPT does not wish to see any additional regulation within the process), provided that operators had sought to properly engage with authorities in the pre-registration period.

	• The OTC would look for the operator / local authority to demonstrate that the proper consultation process had been undertaken, otherwise the registration would not be accepted. • It was accepted that the same requirement to consult would also apply to variations and service cancellations. • It was felt that it wasn't the TC's role to judge a registration. If the application was in order it is just for them to process it.
10.	Should authorities respond to the Traffic Commissioner on every registration, regardless of whether they have any concerns or not? Should the registration form ask operators to detail what pre-registration consultation has been undertaken? • The local authority has to certify this anyway, so no real change needed.
11.	What action should the Traffic Commissioner be able to take regarding concerns raised by authorities? Will these require additional legislation / powers? • Should continue as present, with no changes. • If an operator failed to demonstrate it had 'consulted' with the relevant authorities, the OTC would not accept the registration. • CPT considered that there should be some sanction against local authorities who failed to respond to an operator within the defined period.
12.	With a 28-day pre-registration period, there is a suggestion that the registration period could be reduced from 56 to 42 days. What are your thoughts on this? • CPT, ALBUM and First all considered that the whole registration process should not extend beyond the total 70 day period, including the 28-day pre-registration period. • CPT felt that this process should be sped up where possible and keep it within a 10 week period.
Electronic Bus Service Registration (EBSR)	
13.	If you have any direct experience of EBSR, describe your thoughts on the system. • Stagecoach is the main user of EBSR • Some authorities convert electronic timetables to paper to re-enter the data • Save time for OTC staff, as data gets entered directly into service register; however, more difficult to check what has changed when have to flick between screens. • TransXchange files means that registrations submitted via EBSR contain a lot more information than that needed for the registration, but that are useful for providing public information. Therefore Bus Users' Scotland considers that EBSR is better for users. • DVSA only monitor services based on defined timing points, even though TransXchange provides information at a stop-by-stop level. CPT felt the DVSA were the beneficiaries of EBSR and that there are minimal benefits to operators.

14.	What are the benefits and drawbacks of EBSR? What aspects of the system deter its usage? What can it do and what can't it do? • Smaller operators can't use EBSR because they can't afford to invest in the software systems that provide the necessary inputs and TransXchange files.
15.	What elements would you expect any improved system to provide? • Web-based service would be useful for smaller operators • The system needs to allow for integration with 'common' software i.e. Microsoft Office. • A support system may be required to help small and medium-sized operators.

Examples of good practice

We are looking for examples of good practice in partnership work between local authorities and bus operators, either generally or in relation to the bus registration process. If you are aware of anything that is successful and might be deemed as good practice, please contact us.

Other general comments made during the session:

• Authorities should ensure that operators have a sufficient number of vehicle discs to operate contract services awarded to them, prior to getting into services being registered.

• It is important to remember the bus user and their needs in any discussions about changes to systems or processes.

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