



Scottish Bus Open Data Consultation

A Response from CTA

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www.ctauk.org

SCOTTISH BUS OPEN DATA: CONSULTATION

Introduction

The Community Transport Association (CTA) leads a thriving Community Transport movement across the UK. Our mission is to ensure everyone has access to local transport which meets their needs, no matter who they are or where they live.

We represent local charities, community groups and social enterprises delivering community-led transport projects and services on a non-profit basis to address unmet transport needs. We have more than 180 members across Scotland's urban, rural and island communities. Our sector is highly diverse and flexible with a mix of modes and models utilised to deliver community-owned buses, Demand Responsive Transport (DRT), car clubs, non-emergency patient transport, schools transport and active travel. Operators utilise a mix of paid and volunteer drivers based on budget, service and need.

Community Transport is integral to Scotland's bus network. Our members directly deliver scheduled, timetabled bus services; indirectly plug gaps in the system for excluded or forgotten individuals, groups and places, especially disabled people, older people and remote, rural and island communities; and provide an essential first- or last-mile link into municipal and commercial routes for bus passengers.

There are 20 Community Transport operators across Scotland delivering community bus services under a Section 22 permit, or a PSV licence, including local, long distance and express services. These serve a range of urban, rural and island communities from Glasgow and Ayr to Glenfarg and Orkney. There are over 100 Community Transport operators in Scotland delivering DRT services with Section 19 permits, including dial-a-ride, dial-a-bus and related, wider services for the local population.

Summary

After consultation with our members, our response to Transport Scotland's consultation on Scottish Open Bus Data makes the following key points:

- **We accept the rationale for Community Bus (Section 22) services being within scope** given the need to improve the passenger experience;
- **We agree that Section 19 services should not be within scope**, as the diversity of such services means it would be neither practical nor appropriate;

- **We welcome the principle of an iterative timescale for implementation** to maximise the opportunity for compliance from all operators. This is particularly critical for smaller operators which are local, community-owned and non-profit;
- **We are concerned that community bus operators do not have the infrastructure or financial capacity required to gather and transmit real time information** and facilities and accessibility information (stage two). There will be significant challenges and costs in doing so before April 2028. This could:
 - Result in the **loss of existing community bus services** due to unaffordable increases in operational costs; and
 - **Prevent the growth of community bus services** due to higher set-up capital costs.
- **We believe Transport Scotland should work collaboratively with CTA and community bus operators to prevent the loss of community bus services by:**
 - **Providing the guidance, training and tools** they need to comply;
 - **Providing financial support** where required; and,
 - **Considering a separate timescale** for community bus operators, potentially on a case-by-case basis.

Section 1: Types of Services

We accept the rationale for the inclusion of Community Bus (Section 22) services within the scope of the secondary legislation. We believe that everyone should have access to local transport information and services which meet their needs, no matter who they are or where they live. As scheduled bus services available to the general public, information about community bus services should be as accessible, open and transparent as possible. This could support passengers to more easily plan their journey and operators to better integrate community-owned bus services with the rest of the bus network, and vice versa. There should be parity of esteem for all bus services regardless of whether the operator is community-, publicly or privately owned.

"We would enthusiastically support anything which makes information available to passengers to make it easier to connect to other services and journey plan. At the moment it still seems to not quite hit the mark."

Drew Smart, Chair, Glenfarg Community Transport Group

www.glenfargct.co.uk

However, the needs of the Community Transport sector are distinct. It is essential that Transport Scotland supports community bus operators to comply with these new

requirements in recognition of the specific profile and role of local, non-profit and community-led organisations (see Sections 4 and 5).

We agree that Section 19 services should not be in scope for the practical reasons outlined in the consultation paper. In addition, we believe that it would not be appropriate or advance the stated aims of Transport Scotland to include these services in scope or seek to develop open data in relation to this provision. Services delivered under Section 19 permits are highly diverse and flexible with features which clearly distinguish them from the rest of the bus sector and Section 22 services and necessitate different treatment. They can be closed, demand responsive services facilitated on an ad hoc, time-limited or journey-specific basis, such as vehicle hire for local groups, clubs and societies. They can be targeted at or tailored for specific individuals based on need, and therefore not available to wider passengers or open to the general public, such as schools transport for disabled children and young people or non-emergency patient transport for older people. Real time information about these kinds of services should not be widely or publicly available.

"I agree that Section 19 should not be included, as this would be impossible to implement in terms of the variety of services provided."

John Reid, Transport Manager, South Ayrshire Community Transport

www.sacommunitytransport.org

Section 2: Use and Disclosure of Information

CTA does not have any concerns over the use of the open data in the ways proposed. We agree that bus open data should be freely available, without charge and without restrictions on its use. This approach is most likely to benefit passengers through the development of new or improved applications, products and services which promote sustainable travel choices, ease journey planning and promote trust.

It is important that third parties present passenger travel information in a wide range of accessible formats to ensure that everyone can benefit regardless of age, disability or any other protected characteristic.

Section 3: The Prescribed Information

We agree with the proposed approach to require timetable, stopping place and route data; fares and ticket data; and bus stop location and facilities data.

We agree that the requirement to provide fares information should be phased in over time, with the initial provision of simple fares information required first, with complex fares information to follow.

We are cognisant, however, of the need to minimise wherever possible the administrative and bureaucratic burden on local charities, community groups and social enterprises. The prescribed information should be proportionate.

We have concerns about the feasibility and cost of community bus operators providing real time information and facilities and accessibility information at stage two. Community buses are not typically equipped with the technology to provide this kind of data. There will be a significant outlay and potential disruption to upgrade the community bus fleet to ensure every vehicle can monitor, record and share live location, live disruption updates, live passenger capacity, live accessible spaces capacity and so on.

It is likely that there will be financial impacts for some Community Transport operators to comply with the new bus open data requirements, potentially putting S22 services at risk. As community-owned, non-profit operators with typically limited reserves facing severe financial pressures, their ability to cover the costs of new capital spending is highly constrained.

There is a risk that significantly increasing the set-up and running costs of community bus services will raise the financial barriers to entry for new community-owned operators, preventing future growth of new local bus services and their expansion. Therefore, a critical question will be whether financial support will be available if required by existing and prospective operators, both now and in the future.

"We could only provide real time tracking data currently. We could not provide data around passenger numbers, accessible spaces or disruptions... We simply cannot afford the financial investment that this tech would require.

"The reality is that even with NSG [Network Support Grant] funding, we subsidise our community bus currently with core funding. It is not financially viable to invest money into community bus travel over and above the funding we currently use for it. Therefore, it is almost certain that we would withdraw these services if we were faced with this requirement to spend money."

Kim Ward, CEO, Lothian Community Transport Services

www.lcts.org.uk

Section 4: Training, Compliance and Enforcement

Scotland's Community Transport sector is not fully prepared for bus open data requirements. At present, awareness would appear to be low. Although some operators would be in a better position to prepare to comply with the new regulations, others have lower levels of data, digital and technological infrastructure, knowledge and skills due to chronic under-investment from funders and transport authorities in the sector's core operating costs beyond frontline service delivery. This is an area of concern in relation to real time information and facilities and accessibility information at stage two.

We welcome Transport Scotland's commitment to work collaboratively with the sector to ensure that new regulations can be complied with and that operators understand the new requirements, any new processes they introduce and any new roles and responsibilities. Guidance, training and tools to support compliance will be necessary. Content and engagement should be tailored to the needs of Community Transport operators as part of an ongoing dialogue.

The proposed requirement for new data to be provided two weeks in advance of any planned changes for tickets, routes, fares, or timetables may be challenging for some operators inside a narrow window after short-term or short notice changes being signed-off.

Section 5: Timescales

For those bus and Community Transport operators with the necessary systems of data collection and processing already in place, the proposed timescales requiring the submission of the prescribed data appear fair and reasonable. Compliance with the first phase of data related to timetables, stopping places, routes, fares and tickets should be generally straightforward.

However, for the second phase related to real time data, many community bus operators do not have the necessary systems, software and hardware already in place. There may be a need for a longer lead-in time to ensure they have sufficient time for organisations to prepare, systems to be upgraded and staff to be upskilled. A separate timescale for these Community Transport operators should be considered, potentially on a case-by-case basis. There can be 'no one size fits all' approach for larger commercial bus operators and small community bus operators.

“These new regulations will impose a huge financial and administrative burden on us, as a charity. We only have 2 members of staff, both working part-time. This new process would place considerable strain on our core costs and we are barely breaking even as it stands.”

Jon Betts, Manager, Galloway Community Transport

www.gallowaycommunitytransport.org

“As a small Community Transport organisation run entirely by unpaid volunteers, we would wish to avoid any onerous demands on us and certainly would not want to incur any additional expenditure.”

Stephen Sparrow, Acting Chairman, Cairn Valley Community Transport

www.cvct.org.uk

Section 6: Data Standards

CTA is not in a position to comment in relation to data standards at this stage.

Section 7: Any Other Comments

CTA would welcome engagement by Transport Scotland with Community Transport operators to raise awareness, understand their challenges and respond to their needs in relation to bus open data. We would be happy to facilitate or support this engagement in the months and years ahead.

Further Information

For more data and evidence about Scotland’s Community Transport sector, please download our [More Than a Minibus \(2022\) report](#).

To discuss this response, or the work of CTA more broadly, please contact:

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