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The Future Of Smart Ticketing In Scotland Analysis of Responses to the Consultation

March 2018

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EXECUTIVE SUMMARY

The majority of respondents thought that a consistent smart payment option available across Scotland and on all main public transport modes would promote use of public transport in Scotland. Many respondents highlighted the potential benefits of this scheme, including the convenience of not having to use cash and the ability to seamlessly switch between modes using the same payment method. Some respondents referred to existing successful smart ticketing schemes around the world including the London Oyster Card. Several respondents provided caveats for their support of the proposals, including that smart ticketing would only promote use of public transport if implemented alongside other measures such as fare capping or integrated travel networks.

A smaller number of respondents were concerned about the proposals, highlighting issues such as those who can only pay in cash and the difficulty to implement such a scheme nationally. Another point that respondents raised was that contactless credit or debit card payments should either be added to or replace the e-purse in order to future proof it.

Scope

Most respondents agreed that the scope of smart ticketing should at first be limited to local bus services in Scotland, scheduled rail journeys entirely within Scotland, foot passengers on scheduled ferry services entirely within Scotland, the Glasgow subway and the Edinburgh tram. Respondents often commented that it is prudent to trial the scheme out gradually before a wider rollout. Some respondents suggested additions to the scope, including long-distance buses and cross-border services.

Legislation

In the main, respondents supported a national e-purse and smart ticketing system across different modes and operators. For both of these schemes, most respondents agreed that; operators should be expected to participate; participation should be monitored and controlled; and, sanctions should be imposed for non-compliance. In general, the majority of respondents were in favour of new legislation that requires transport operators to participate in national and regional smart ticketing schemes. Some respondents commented that without legislation, the scheme may not be taken up by all operators and could subsequently fail. In contrast, some respondents commented that legislation should be used as a last resort if voluntary arrangements fail, while others argue that if the scheme was made attractive enough to operators, legislation would not be needed.

Governance

The majority of respondents thought that Transport Scotland should establish a single governance group so that the technology implemented across Scotland for smart ticketing schemes is controlled. Most respondents also believed that this group should be established formally and supported by legislation in addition to having a role in advising on development, implementation or administration of smart ticketing schemes. The consultation asked respondents whether there were any other areas

that the governance group should have a role in. Some suggestions included focussing on integrating the network and regulating fares, as well as representing customer/user views. A few respondents expressed the concern that a single governance group could be too centralised or duplicate the effort of ITSO (Integrated Transport Smartcard Organisation).

Wider impacts

The consultation asked respondents about the proposals' potential wider impacts. In terms of child safety, respondents commented that the impact would either be neutral or positive due to young people no longer having to carry cash. The same potential benefit was identified for equality, particularly for older and disabled people, though respondents also requested that the technology is designed with accessibility in mind. Some respondents highlighted the potential negative equality impact upon those without the financial means to access smart ticketing.

Some respondents expressed a concern that smaller transport operators may be negatively impacted by technology installation fees and transaction charges. In contrast, some respondents argued that the long-term and wider benefits would justify the initial costs.

Respondents gave a range of views on the proposals' potential privacy impacts. Some believed that there is already sufficient consideration of this potential impact or that if the appropriate standards are adhered to there will be no significant impact. In contrast, some respondents were concerned that the system will be 'hackable' or that their civil liberties would be impinged.

1. INTRODUCTION

Background

- 1.1 This report analyses and summarises responses that were received through a Scottish Government consultation on the future of smart ticketing in Scotland. The consultation sought to gather the views of stakeholders and individuals with an interest in the implementation of nation-wide multi-modal smart ticketing.
- 1.2 Smart ticketing is an important element of a modern public transport system and is increasingly prevalent in major cities and countries around the world. It offers a number of benefits for users, transport operators and society including greater choice, less cash handling and promotion of a modal shift to public transport. This contributes towards the Scottish Government's Greener Strategic Objective.
- 1.3 There has already been considerable progress in delivering smart ticketing on public transport in Scotland. The National Concessionary Travel Scheme has been fully smart since 2010, the Glasgow subway fully smart since 2013 and a number of bus companies already offer a range of smart products on their services. There are also successful multi-operator smartzones in Aberdeen and Dundee, and bus operators have committed to deliver similar smartzones in Glasgow and Edinburgh.
- 1.4 The Scottish Government's vision is that all journeys on Scotland's bus, rail, ferry, subway and tram networks can be made using some form of smart ticketing or payment. This consultation focused on how to achieve this, along with how to sustain and build upon it as new technology evolves and matures. More specifically, this includes the Scottish Government's intention to introduce an e-purse in Scotland which can be defined as "the store of monetary value on a smartcard which can be used in the same way as cash to pay for travel". This consultation also explored other forms of smart payment, for example, using a contactless bank card to pay for travel, and mobile apps which may, for example, involve a digital representation of a travel ticket.
- 1.5 The consultation was launched on 13th September 2017 and closed on 5th December 2017, with most responses submitted online via the Citizen Space consultation hub.
- 1.6 The consultation included 20 questions, and asked respondents to provide comments on matters including:
 - The potential for smart ticketing to promote use of public transport in Scotland;
 - A national e-purse scheme;
 - Multi-modal, multi operator regional smart ticketing schemes;
 - A governance group to control the implementation of smart ticketing schemes; and
 - The potential wider impacts of smart ticketing.

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

Profile of respondents

1.6 A total of 148 responses were received to this consultation with responses received from members of the public, local authorities, transport operators, regional transport partnerships, public bodies and other organisations. Respondents were broadly divided into two distinct groups for the purposes of analysis: those submitted by members of the public (individuals) and those submitted by groups with a specific interest or expertise in the topic area (organisations). A total of 98 responses were received from individual respondents with the remaining 50 coming from organisations.

1.7 A profile of respondents by type is set out in Table 1 below. Group respondents were placed into one of nine respondent types by the analysis team.

Table 1: Respondents by type

Type of respondent	Number
Groups:	
Campaign Groups	2
Local Authorities	14
Other Public Bodies	9
Political Parties & Representatives	2
Regional Transport Partnerships	4
Third Sector	1
Transport Industry	7
Transport Operators	9
User Groups	2
Total Groups	50
Individuals	98
TOTAL	148

1.8 Where respondents gave permission for their response to be made public, these have been made available on Citizen Space which is accessible via the Scottish Government [website](#). All respondents were given the choice to submit anonymously and for their responses to be made anonymous in reporting.

1.9 Out of the 20 questions: four provided multiple-choice answer options in the first instance, with respondents then being asked to state the reasons for their views and invited to provide comments, evidence or examples as appropriate; 11 only provided multiple choice answer options and five only asked for comments.

Analysis and reporting

- 1.10 Analysis of responses was carried out by Dialogue by Design, an externally commissioned organisation offering expertise in handling public consultations. The analysis process considered both the closed and open questions. For the open questions, the analysis focusses on the most common comments, or themes offered by respondents, although other points made less frequently are also taken into consideration. As far as possible, the analysis tries to distinguish any notable differences or similarities between individual and organisational respondents.
- 1.11 While quantitative analysis has been carried out for the closed questions, statistical analysis was not considered appropriate for the analysis of comments to the open questions. However, in order to give an indication of the varying strengths of opinion behind different views, the following quantifiers are used:
- “A few” to refer to 10 or fewer respondents;
 - “Some” or “Several” to refer to between 11 and 73; and
 - “Many” to refer to more than half of the respondents (74).

2. SMART TICKETING IN SCOTLAND

Question 1: Do you think our intention to have a consistent smart payment option available across Scotland and on all main public transport modes would promote use of public transport in Scotland?

2.1 The first question asked respondents whether they believed Transport Scotland’s proposal for a national multi-modal smart ticketing scheme will promote wider use of public transport in Scotland.

Table 2: Question 1 – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups		1	1
Local Authorities	9	3	12
Other Public Bodies	7		7
Political parties and representatives	2		2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	5	3	8
User Groups	1		1
Total Groups (n)	27	7	34
<i>Total Groups (%)</i>	<i>79%</i>	<i>21%</i>	<i>100%</i>
Individuals (n)	85	17	102
<i>Individuals (%)</i>	<i>83%</i>	<i>17%</i>	<i>100%</i>
TOTAL (n)	112	24	136
<i>TOTAL (%)</i>	<i>82%</i>	<i>18%</i>	<i>100%</i>

2.2 The majority of respondents (82%) agreed that a consistent smart payment option available across Scotland would promote the use of public transport. Groups and individuals responded similarly.

2.3 There were 127 additional comments provided in response to question 1. The following section reports on these comments. Relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure are also covered in this section.

Potential benefits of a smart ticketing scheme

- 2.4 Many respondents highlighted the potential benefits of a smart payment option available across Scotland, most often focusing on convenience and consistency. One of the most frequently raised advantages was no longer needing to carry cash and follow operators' 'exact fare' policies. Respondents criticised the perceived complexity of current fare structures and were enthusiastic for a simpler payment system to benefit both locals and visitors to Scotland. Respondents also highlighted the potential for reduced queues at ticket offices or machines and quicker transfers between modes.

“Having smart ticketing makes using public transport easier as there is not the need to find change to pay for fares. It is also easier to 'hop' on and off buses to get to your destination.” (Local authority)

- 2.5 Some respondents identified potential knock-on benefits from a smart ticketing scheme including improved traffic flow, reduced carbon emissions, improved health (from users walking between modes) and increased accessibility for young people and those with protected characteristics (see equality impacts below at 5.4).
- 2.6 Several respondents referred to existing smart payment schemes that they believe to be successful, most often the Oyster card in London, but also existing schemes in Scotland such as the GrassHOPPER in Aberdeenshire.
- 2.7 Some respondents expressed support for a smart payment scheme but with caveats. These included: building upon rather than replacing smart payment technology that Transport Authorities have already implemented; ensuring that the technology chosen does not preclude future innovation; and retaining the option of paying cash for those who are unable to use smart payments due to income or digital literacy.

“Whilst the development of smart payment methods is to be welcomed, the option of paying by cash should remain. This is particularly important for disadvantaged people, for example those who do not have access to a bank account.” (Local authority)

- 2.8 Several respondents also provided caveats around pricing. They commented that fares must be affordable to ensure the scheme's intention of promoting increased public transport use. Some respondents specifically suggested a pay-as-you-go system with daily or weekly fare caps, as are used by Transport for London. They argued that such a system is more flexible and easier to use.

Concerns regarding a smart ticketing scheme

- 2.5 Some respondents expressed concerns with smart ticketing's potential to increase public transport use, though the reasons for these concerns varied

greatly. A few of these respondents opposed a potentially cashless system. They argued that cash is already a consistent form of payment, it is more flexible and does not preclude those who may be unable or unwilling to use technology (see 5.6 - 5.8 for concerns around equality).

“We already have a single method of payment for travel - cash - which can be used across all modes and operators. I cannot see the benefits you suggest will accrue. You are just complicating the system, adding cost and marginalizing people who do not use technology.” (Individual)

- 2.6 Several respondents commented that smart ticketing would not increase public transport use alone without other improvements to the services or industry. These proposed improvements included an integrated public transport network, affordable fares and nationalisation. A few respondents went further to suggest that these other improvements should take priority over smart ticketing.
- 2.7 Other respondents were concerned about the quality of the smart ticketing technology. They described alleged poor quality existing smart ticketing schemes in Scotland and argued that this did not inspire confidence for the future. A few respondents also expressed concern that the technology may not be effectively future-proofed to prevent it being quickly outdated. Others commented that the national roll-out of the technology may be too slow and subsequently cause disruption.
- 2.8 A few respondents were concerned less with the concept of smart ticketing, but with the need for a national scheme. They commented that most journeys take place within a small area and often using the same operator. Because of this, they argued, a national smart ticketing scheme would be unnecessary.

Alternative smart ticketing technology

- 2.9 Some respondents commented on alternatives to the e-purse such as contactless/EMV (Europay, Mastercard and Visa) and mobile phone payments. These comments highlighted the potential benefits of using items such as bank cards and phones, which users already possess rather than issuing them with a new smartcard. Other comments focused on observing perceived trends towards contactless payments, either replacing smartcards or running in tandem. Respondents often referred to Transport for London’s combined Oyster and contactless payment methods.

“Why could this not be via contactless payment, alongside a smart card (like Oyster) exactly as in London. The example is there and works and works well. Anything less will likely need to be updated in the future.” (Individual)

Additional suggestions for smart ticketing

2.10 Some respondents made specific suggestions for how a smart ticketing scheme could best operate to encourage public transport use. A key theme surrounded accessibility with respondents requesting: the ability to top up automatically or online to avoid queues; records kept so users can travel if they lose their card; and the ability to load concessions and season tickets onto smart ticketing products.

2.11 A few respondents suggested a points system or branding to encourage loyalty to the smart ticketing products and a resulting increase in public transport use. Other suggestions included:

- Automatic refunds for service delays or cancellations;
- No minimum top-up to remove potential barriers to access;
- Printable receipts for those claiming travel expenses; and
- Promoting the use of the Gaelic language as part of the Scottish Government's Gaelic Language plan¹.

¹ <http://www.gov.scot/Publications/2017/05/2095>

Question 2: Do you agree that the scope of smart ticketing should – for now – be limited to the modes and services outlined below?

2.12 The second question asked respondents whether they think that Transport Scotland’s proposed scope for a national multi-modal smart ticketing scheme is appropriate.

Table 3: Question 2 – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	7	6	13
Other Public Bodies	4	3	7
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	7		7
User Groups	1		1
Total Groups (n)	24	10	34
<i>Total Groups (%)</i>	<i>71%</i>	<i>29%</i>	<i>100%</i>
Individuals (n)	74	30	104
<i>Individuals (%)</i>	<i>71%</i>	<i>29%</i>	<i>100%</i>
TOTAL (n)	98	40	138
<i>TOTAL (%)</i>	<i>71%</i>	<i>29%</i>	<i>100%</i>

2.13 The majority of respondents (71%) agreed that the scope of smart ticketing should be limited initially. Groups and individuals responded in the same way.

2.14 There were 110 additional comments provided in response to question 2. The following section reports on these comments. Relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure are also covered in this section.

Appropriate scope

2.15 Some respondents highlighted the potential benefits of Transport Scotland’s initial proposed scope for smart ticketing. Respondents commented that it would be too complicated to include all modes from the start and expanding gradually would allow the opportunity to resolve issues before a wider roll-out. They also

thought it made sense to start with the most popular modes which would be easier to incorporate:

“It makes sense to roll the scheme out to the modes of transport which are most easily incorporated first, making use of pre-existing infrastructure where possible to minimise cost and bring about reform in a timely manner. Additional modes of transport can always be included later.” (Individual)

2.16 Several respondents expressed support for the proposed scope with caveats. Most of these caveats were suggested additions to the scope, covered below in 2.12 and 2.13. Other caveats included preceding the proposed scope with a regional pilot as well as requests for the scope to be expanded as quickly as possible.

Suggested additions

2.17 Some respondents suggested that the following modes should be included within the scope of the smart ticketing schemes:

- Long-distance, intercity and express coaches which, respondents argued, are essential for the most remote areas of Scotland;
- Cross-border services for users travelling regularly between Scotland and England; and
- Cycle-hire schemes to encourage low carbon transport and exercise.

2.18 The following modes were also suggested as modes that should be included in the scope of smart ticketing schemes, but by fewer people:

- Short-haul air services for remote communities in the Highlands and Islands;
- Community transport schemes, including dial-a-bus;
- Car share and car club schemes;
- Vehicle journeys on ferries;
- Electric vehicle charging points; and
- Park and ride schemes.

2.19 A few respondents also suggested adopting Mobility as a Service (MaaS), a concept defined as a move away from private car use to offering consumers

access to a range of vehicle types². This includes many of the modes referred to above.

Concern with scope

2.20 A few respondents expressed concerns with the proposed scope for smart ticketing. These included comments that a gradual approach to increasing the scope may be less effective than starting with all modes from the outset. Another concern was around including smaller operators within the scope and the potential implementation costs (see 3.24 below).

² For more information see https://ts.catapult.org.uk/wp-content/uploads/2016/07/Mobility-as-a-Service_Exploring-the-Opportunity-for-MaaS-in-the-UK-Web.pdf

3. E-PURSE AND REGIONAL SCHEMES

Question 3a: Are you in favour of a clearly defined national e-purse scheme?

3.1 Question 3a asked respondents if they support a national e-purse scheme.

Table 4: Question 3a – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	8	4	12
Other Public Bodies	5		5
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	3	6	9
User Groups	1		1
Total Groups (n)	22	11	33
<i>Total Groups (%)</i>	<i>67%</i>	<i>33%</i>	<i>100%</i>
Individuals (n)	84	14	98
<i>Individuals (%)</i>	<i>86%</i>	<i>14%</i>	<i>100%</i>
TOTAL (n)	106	25	131
<i>TOTAL (%)</i>	<i>81%</i>	<i>19%</i>	<i>100%</i>

3.2 The majority of respondents (81%) marked support for a national e-purse scheme. Individuals were more supportive (86%) than groups (67%). The majority of groups opposing this proposal were transport operators.

Question 3b: Should all relevant bus, rail, ferry, tram and subway operators be expected to participate in a national e-purse scheme?

3.3 Question 3b asked respondents whether they believe operators across the proposed modes should be expected to participate in a national e-purse scheme.

Table 5: Question 3b – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	8	6	14
Other Public Bodies	5	2	7
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	3	6	9
User Groups	1		1
Total Groups (n)	22	15	37
<i>Total Groups (%)</i>	<i>59%</i>	<i>41%</i>	<i>100%</i>
Individuals (n)	84	12	96
<i>Individuals (%)</i>	<i>88%</i>	<i>13%</i>	<i>100%</i>
TOTAL (n)	106	27	133
<i>TOTAL (%)</i>	<i>80%</i>	<i>20%</i>	<i>100%</i>

3.4 The majority of respondents (80%) agreed that all relevant bus, rail, ferry, tram and subway operators be expected to participate in a national e-purse scheme. Individuals were more supportive (88%) than groups (59%).

Question 3c: Should participation in a national e-purse scheme be monitored and controlled?

3.5 Question 3c asked respondents whether the national e-purse scheme should be monitored and controlled.

Table 6: Question 3c – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	10	3	13
Other Public Bodies	5	1	6
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	3	6	9
User Groups	1		1
Total Groups (n)	24	11	35
<i>Total Groups (%)</i>	<i>69%</i>	<i>31%</i>	<i>100%</i>
Individuals (n)	84	12	96
<i>Individuals (%)</i>	<i>88%</i>	<i>13%</i>	<i>100%</i>
TOTAL (n)	108	23	131
<i>TOTAL (%)</i>	<i>82%</i>	<i>18%</i>	<i>100%</i>

3.6 The majority of respondents (82%) agreed that participation in a national e-purse scheme be monitored and controlled. Individuals were more supportive (88%) than groups (69%). The majority of groups opposing this proposal were transport operators.

Question 3d: Should sanctions be imposed for non-compliance in a national e-purse scheme?

3.7 Question 3d asked respondents whether those who do not comply with the national e-purse should be faced with sanctions.

Table 7: Question 3d – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	4	8	12
Other Public Bodies	3	2	5
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	1	8	9
User Groups	1		1
Total Groups (n)	14	19	33
<i>Total Groups (%)</i>	<i>42%</i>	<i>58%</i>	<i>100%</i>
Individuals (n)	79	17	96
<i>Individuals (%)</i>	<i>82%</i>	<i>18%</i>	<i>100%</i>
TOTAL (n)	93	36	129
<i>TOTAL (%)</i>	<i>72%</i>	<i>28%</i>	<i>100%</i>

3.8 The majority of respondents (72%) agreed that sanctions should be imposed for non-compliance in a national e-purse scheme. Individuals were significantly more supportive (82%) than groups (42%). Most local authorities and transport operators that responded to this consultation opposed this proposal.

Question 4a: Are you in favour of a clearly defined multi-modal, multi operator regional smart ticketing scheme?

3.9 Question 4a asked respondents whether they support a regional smart ticketing scheme which operates across different modes and operators.

Table 8: Question 4a – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	13	1	14
Other Public Bodies	6		6
Political parties and representatives	2		2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	8	1	9
User Groups	1		1
Total Groups (n)	34	2	36
<i>Total Groups (%)</i>	<i>94%</i>	<i>6%</i>	<i>100%</i>
Individuals (n)	93	7	100
<i>Individuals (%)</i>	<i>93%</i>	<i>7%</i>	<i>100%</i>
TOTAL (n)	127	9	136
<i>TOTAL (%)</i>	<i>93%</i>	<i>7%</i>	<i>100%</i>

3.10 The majority of respondents (93%) marked support for a clearly defined multi-modal, multi operator regional smart ticketing scheme. Groups and individuals responded similarly.

Question 4b: Should all relevant bus, rail, ferry, tram and subway operators be expected to participate in a multi-modal, multi operator regional smart ticketing scheme?

3.11 Question 4b asked respondents whether they believed operators across the proposed modes should be expected to participate in a regional smart ticketing scheme.

Table 9: Question 4b – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	12	2	14
Other Public Bodies	6		6
Political parties and representatives	2		2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	6	2	8
User Groups	1		1
Total Groups (n)	31	4	35
<i>Total Groups (%)</i>	<i>89%</i>	<i>11%</i>	<i>100%</i>
Individuals (n)	93	6	99
<i>Individuals (%)</i>	<i>94%</i>	<i>6%</i>	<i>100%</i>
TOTAL (n)	124	10	134
<i>TOTAL (%)</i>	<i>93%</i>	<i>7%</i>	<i>100%</i>

3.12 The majority of respondents (93%) agreed that transport operators should be expected to participate in a multi-modal, multi operator regional smart ticketing scheme. Groups and individuals responded similarly.

Question 4c: Should participation in a multi-modal, multi operator regional smart ticketing scheme be monitored and controlled?

3.13 Question 4c asked respondents whether the regional smart ticketing scheme should be monitored and controlled.

Table 10: Question 4c – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	14		14
Other Public Bodies	5		5
Political parties and representatives	2		2
Regional Transport Partnerships	3		3
Third Sector			0
Transport Industry			0
Transport Operators	7	1	8
User Groups	1		1
Total Groups (n)	33	1	34
<i>Total Groups (%)</i>	<i>97%</i>	<i>3%</i>	<i>100%</i>
Individuals (n)	88	10	98
<i>Individuals (%)</i>	<i>90%</i>	<i>10%</i>	<i>100%</i>
TOTAL (n)	121	11	132
<i>TOTAL (%)</i>	<i>92%</i>	<i>8%</i>	<i>100%</i>

3.14 The majority of respondents (92%) agreed that participation in a multi-modal, multi operator regional smart ticketing scheme should be monitored and controlled. Groups were slightly more supportive of this proposal (97%) than individuals (90%).

Question 4d: Should sanctions be imposed for non-compliance in a multi-modal, multi operator regional smart ticketing scheme?

3.15 Question 4d asked respondents whether those who do not comply with the regional smart ticketing scheme should be faced with sanctions.

Table 11: Question 4d – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	9	4	13
Other Public Bodies	5		5
Political parties and representatives	2		2
Regional Transport Partnerships	3		3
Third Sector			0
Transport Industry			0
Transport Operators	3	5	8
User Groups	1		1
Total Groups (n)	24	9	33
<i>Total Groups (%)</i>	<i>73%</i>	<i>27%</i>	<i>100%</i>
Individuals (n)	82	16	98
<i>Individuals (%)</i>	<i>84%</i>	<i>16%</i>	<i>100%</i>
TOTAL (n)	106	25	131
<i>TOTAL (%)</i>	<i>81%</i>	<i>19%</i>	<i>100%</i>

3.16 The majority of respondents (81%) agreed that sanctions should be imposed for non-compliance in a multi-modal, multi operator regional smart ticketing scheme. Individuals were more supportive of this proposal (84%) than groups (73%).

Question 5: Are you in favour of new legislation that requires transport operators to participate in national and regional smart ticketing schemes?

3.17 Question 5 asked respondents whether they support new legislation that would require transport operators to participate in national and regional smart ticketing schemes.

Table 12: Question 5 – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	7	5	12
Other Public Bodies	5		5
Political parties and representatives	2		2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	6	2	8
User Groups	1		1
Total Groups (n)	25	7	32
<i>Total Groups (%)</i>	<i>78%</i>	<i>22%</i>	<i>100%</i>
Individuals (n)	87	14	101
<i>Individuals (%)</i>	<i>86%</i>	<i>14%</i>	<i>100%</i>
TOTAL (n)	112	21	133
<i>TOTAL (%)</i>	<i>84%</i>	<i>16%</i>	<i>100%</i>

3.18 The majority of respondents (84%) supported new legislation that requires transport operators to participate in national and regional smart ticketing schemes. Individuals were more supportive of this proposal (86%) than groups (78%). Most of the groups opposing this proposal were local authorities.

3.19 There were 114 additional comments provided in response to question 5. The following section reports on these comments. Relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure are also covered in this section.

Potential benefits of smart ticketing legislation

3.20 Some respondents highlighted the potential benefits of smart ticketing legislation. While some argued that it would be difficult to encourage operators to take part voluntarily, others stated that a country-wide scheme would be impossible to establish without legislation, including monitoring and sanctions. A few respondents commented that if the scheme is not rolled out nationally, its purpose will have been defeated. Respondents also highlighted the potential confusion for users if there is non-compliance across the country.

3.21 Several respondents commented on the perceived fragmentation of current ticketing schemes, criticising existing examples of multi-operator schemes. They suggested that legislation is required to facilitate improved public transport integration.

*“The current fragmented nature of modes and large variation of operators involved will require an appropriate legislative framework to ensure participation and therefore success of any national scheme.”
(Other public body)*

3.22 Some respondents expressed support for smart ticketing legislation with caveats. One of the most common caveats given was that operators should be given the opportunity to comply voluntarily, with legislation used only as a last resort. A few respondents also supported legislation but with exemptions for low frequency/use bus services due to the potential high implementation cost.

Concerns regarding smart ticketing legislation

3.23 Several respondents criticised the concept of smart ticketing legislation. Respondents commented that technology and innovation are shaped by customer needs and that Government interference in the free market could endanger this process or distort competition.

“The commercial market is already providing solutions. It is inconsistent in a deregulated market place, predicated on commercial free will, that the Government mandates ticketing solutions that are far better delivered commercially in response to customer demands.” (Regional Transport Partnership)

3.24 Similarly, respondents commented that if the schemes are made attractive enough to both operators and users they would adopt the technology voluntarily and legislation would be unnecessary.

3.25 A few respondents expressed concerns around the potential costs of implementing smart ticketing technology, particularly for smaller operators. They also stated that these costs may be a barrier to entry for new operators.

Legislation suggestions

3.26 A few respondents made suggestions regarding smart ticketing legislation. These included:

- Financial support for and training on smart ticketing technology for smaller operators;
- Withholding Bus Service Operator Grant (BSOG) money as a form of sanction for non-compliance; and
- Using smart ticketing compliance as a pre-requisite for granting a licence to an operator.

4. GOVERNANCE OF SMART TICKETING IN SCOTLAND

Question 6a: To ensure delivery of a consistent approach to meet the expectations of passengers now and in the future, should we establish a single governance group so that the technology implemented across Scotland for smart ticketing schemes is controlled?

4.1 Question 6a asked respondents whether Transport Scotland should establish a single governance group to control the implementation of smart ticketing technology.

Table 13: Question 6a – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	8	4	12
Other Public Bodies	5	1	6
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	7	1	8
User Groups	1		1
Total Groups (n)	26	7	33
<i>Total Groups (%)</i>	<i>79%</i>	<i>21%</i>	<i>100%</i>
Individuals (n)	94	9	103
<i>Individuals (%)</i>	<i>91%</i>	<i>9%</i>	<i>100%</i>
TOTAL (n)	120	16	136
<i>TOTAL (%)</i>	<i>88%</i>	<i>12%</i>	<i>100%</i>

4.2 The majority of respondents (88%) supported a single governance group to control the implementation of smart ticketing technology across Scotland. Individuals were slightly more supportive of this proposal (91%) than groups (79%). Most of the groups opposing this proposal were local authorities.

Question 6b: Should such a governance group be established formally and supported by legislation?

4.3 Question 6b asked respondents whether the proposed governance group should be established formally and supported by legislation.

Table 14: Question 6b – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	8	5	13
Other Public Bodies	5	1	6
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	3	5	8
User Groups	1		1
Total Groups (n)	22	12	34
<i>Total Groups (%)</i>	<i>65%</i>	<i>35%</i>	<i>100%</i>
Individuals (n)	89	14	103
<i>Individuals (%)</i>	<i>86%</i>	<i>14%</i>	<i>100%</i>
TOTAL (n)	111	26	137
<i>TOTAL (%)</i>	<i>81%</i>	<i>19%</i>	<i>100%</i>

4.4 The majority of respondents (81%) agreed that a governance group should be established formally and supported by legislation. Individuals were more supportive of this proposal (86%) than groups (65%). Most of the groups opposing this proposal were local authorities or transport operators.

Question 6c: Should such a governance group have a role in advising on development, implementation or administration of smart ticketing schemes?

4.5 Question 6c asked respondents whether the proposed governance group should advise on developing, implementing and administering smart ticketing schemes.

Table 15: Question 6c – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	10	3	13
Other Public Bodies	5	1	6
Political parties and representatives	1	1	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	6	2	8
User Groups	1		1
Total Groups (n)	27	7	34
<i>Total Groups (%)</i>	<i>79%</i>	<i>21%</i>	<i>100%</i>
Individuals (n)	87	15	102
<i>Individuals (%)</i>	<i>85%</i>	<i>15%</i>	<i>100%</i>
TOTAL (n)	114	22	136
<i>TOTAL (%)</i>	<i>84%</i>	<i>16%</i>	<i>100%</i>

4.6 The majority of respondents (84%) agreed that a governance group should have a role in advising on development, implementation or administration of smart ticketing schemes. Individuals were slightly more supportive of this proposal (85%) than groups (79%).

Question 6d: Are there any other areas that a governance group should have a role in?

4.7 Question 6d asked respondents whether the proposed governance group should be responsible for any other roles.

Table 16: Question 6d – Responses by type of respondent

Type of respondent	Yes	No	TOTAL
Campaign Groups	1		1
Local Authorities	5	8	13
Other Public Bodies	4	1	5
Political parties and representatives		2	2
Regional Transport Partnerships	3		3
Third Sector			
Transport Industry			
Transport Operators	5	3	8
User Groups	1		1
Total Groups (n)	19	14	33
<i>Total Groups (%)</i>	<i>58%</i>	<i>42%</i>	<i>100%</i>
Individuals (n)	44	54	98
<i>Individuals (%)</i>	<i>45%</i>	<i>55%</i>	<i>100%</i>
TOTAL (n)	63	68	131
<i>TOTAL (%)</i>	<i>48%</i>	<i>52%</i>	<i>100%</i>

4.8 The majority of respondents (52%) did not think there were any other areas that a governance group should have a role in. More groups believed this (58%) than individuals (45%). Most of the groups which thought the role should not be extended were local authorities.

4.9 There were 82 additional comments provided in response to question 6d. The following section reports on these comments. Relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure are also covered in this section. As questions 6a-c did not have their own open questions, some respondents also included comments on those proposals here and are discussed below.

Quality assurance and integration

4.10 Some respondents suggested that the governance group should also evaluate the implementation of smart ticketing in terms of service quality, fair pricing and, most frequently, consistency of technology.

“The group should look to make sure that companies are rolling out the required equipment and implementing the smart card scheme as well and as quickly as they reasonably can, and making sure it's done so consistently.” (Individual)

4.11 A few respondents suggested that the governance group should adopt a more formal role as ombudsman in the event of disputes between operators.

Representation

4.12 Some respondents made suggestions for how the governance group should be composed in terms of relevant stakeholders. This included:

- Operators, Regional Transport Partnerships and local authorities;
- User/customer representation, including young people;
- Representation across different modes of transport; and
- A balance of urban and rural stakeholders.

Governance concerns

4.13 Some respondents expressed concerns with the proposed governance group. A few of these concerns focused on potential conflicts of interests with existing commercial relationships. Others commented that it would be an unnecessary layer of administration. Similarly, a few respondents stated that the proposed governance group would duplicate the work of ITSO Ltd who already focus on smartcard integration.

“The proposal for a single governance group is not required. ITSO provides a sufficient standard, guidance and governance to control a smart ticketing scheme.” (Regional Transport Partnership)

National and devolved governance

4.14 A few respondents made comments on how the Scottish and UK Governments should be involved with the governance group. While some of these respondents suggested that the group should be overseen or managed by the

Scottish Government, others believed that a UK-wide governance group would be more appropriate.

Legislation and formalisation

4.15 Mirroring question 6b above, a few respondents reiterated their support for a formal governance group backed up by legislation. Respondents commented that this would be essential to ensure compliance with the proposed schemes.

Other potential roles

4.16 A few respondents suggested other potential roles for a governance group including support and information on smart ticketing, along with communication and education about the technology.

5. ASSESSING IMPACT

Question 8: Equality - Are there any likely impacts the proposals contained within this Consultation may have on particular groups of people, with reference to the 'protected characteristics' listed below?

5.1 Question 8 asked respondents about any potential impacts of the scheme on people within 'protected characteristics. These are:

- Age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion and belief; and
- sex and sexual orientation.

5.2 There were 116 responses received to question 8. The following section reports on these comments, relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure.

Sufficient consideration

5.3 Some respondents commented that they do not believe the proposals will have any significant equality impacts.

Potential benefits

5.4 Some respondents commented that the proposals will have a positive impact upon equality, and highlighted several groups which they believe will benefit from the proposals. These included:

- Those with mobility difficulties due to smart ticketing's potential to reduce the movements required to buy tickets;
- Those with learning difficulties and those who have difficulties with social interaction due to there being less requirement for social interaction with smart ticketing;

- Those without a car due to potentially quicker payments allowing buses to run to schedule; and
 - Those on low income due to the potential for imbedded concessions or discounts.
- 5.5 A few respondents also commented that a single smartcard could make it easier to apply a combination of concessions and discounts. Others commented that all groups in society will benefit from the proposals.

“By creating an open system with multiple methods of consumption and integration you make it wholly accessible by whatever means is appropriate.” (Individual)

Equality concerns

- 5.6 Some respondents commented that the proposals could create inequality between those who are able to easily use the required technology and those who are not. They argued that some people may struggle to use the new system, such as those with physical or learning difficulties; those with a language barrier and those who are unfamiliar with the required technology.
- 5.7 A few respondents commented that some users may be sceptical about replacing familiar aspects of travel, such as physical cash and staff selling tickets, with an unfamiliar system where these aspects are electronic. Respondents also commented that if the system is entirely cashless those without access to a bank card or online banking may be disadvantaged.
- 5.8 Respondents pointed out that, presently, there are a great many concessionary schemes operated by different local authorities which are not always consistent. Respondents commented that it might not be possible to fairly and consistently integrate these schemes into a single smartcard and that this could lead to concessionary travellers becoming disadvantaged by the new system.

Mitigation suggestions

- 5.9 To mitigate the possibility of the scheme impacting upon equality, some respondents suggested that aspects of the remaining system must remain in place for those who rely upon them, including paper tickets and the ability to use cash. Respondents also emphasised the importance of designing all aspects of the system with accessibility in mind. They also suggested that all users should be able to receive assistance when required.

*“The scheme would also require to be developed to ensure that it could be operated by a wide range of users to ensure that it is inclusive and does not disadvantage any user. Paper ticketing opportunities would however require to be retained for users who are unable to access digital information or utilise a smart ticket system.”
(Regional Transport Partnership)*

Question 9: Children's Rights - Do you think the proposals contained within this Consultation may have any additional implications on the safety of children and young people?

- 5.7 Question 9 asked respondents about any potential impacts of the scheme on the safety of children and young people.
- 5.8 There were 110 responses received to question 9. The following section reports on these comments, relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure.

Sufficient consideration

- 5.9 Some respondents thought that the scheme would not significantly impact upon the safety of children and young people on public transport.

Potential benefits

- 5.10 Some respondents highlighted the potential benefits of the system in helping to ensure the safety of children and young people on public transport. These included:
- Children and young people will no longer need to carry cash;
 - Parents will be able to remotely top up a child's card in an emergency; and
 - It might be easier to locate missing children.
- 5.11 These benefits, respondents argued, would increase the attractiveness of public transport for children and young people, increasing independence and mobility.

“I actually think this helps to keep kids safe if parents or carers can prepay or budget ahead so no cash is being carried by children. Also, if someone is in dire circumstances and have no cash, a single or max of two journeys can be charged to the account and repaid as an outstanding charge.” (Individual)

Child safety concerns

- 5.12 A few respondents drew attention to the potential safety risks of the scheme to children and young people. A few feared that smartcards would contain too much printed personal information, which they argued could lead to identity theft. Others feared that the personal details and journeys of children and young people, stored on the smartcard system, could be hacked.
- 5.13 A few respondents expressed concerns regarding how smartcards are topped up, commenting that children and young people could be left stranded if they have insufficient funds on their card, or that they would need to carry an additional payment method, putting them at risk.
- 5.14 A few respondents commented that the additional freedom and independence that the system might provide to children could itself be a risk.

Mitigation suggestions

- 5.15 A few respondents suggested ways to mitigate potential risks to children and young people from the proposals. Respondents highlighted the importance of implementing established good practice in data protection to protect the personal data of children and young people, as well as only including essential printed data on smartcards, to protect children and young people's privacy. Respondents also suggested the need for a high-quality system for parents to be able to authorise remote payments in emergencies and track their children if necessary.
- 5.16 A few respondents commented that, if there are any potential safety risks to children and young people, these could be mitigated through good education about how to use the system. Other respondents suggested consulting directly with children and young people, and the organisations which work with them, to develop suitable arrangements.
- 5.17 Other suggestions included integrating the proposals with the Young Scotcard system and ensuring operators do not leave children and young people stranded, even if they cannot pay for a journey.

Question 10: Business and Regulatory - Do you think the proposals contained in this Consultation are likely to increase or reduce the costs and burdens placed on any sector?

5.18 Question 10 asked respondents whether the proposals are likely to increase or reduce costs or burden on any sectors in Scotland.

5.19 There were 111 responses received to question 10. The following section reports on these comments, relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure.

No/minimal impact

5.20 Some respondents commented that there will be no cost impact to businesses of the proposals and a few highlighted schemes in Glasgow and London as examples of successes. A few commented that the initial outlay will be high, but that costs will stabilise to a reasonable level over time.

5.21 A few respondents commented that the costs of the proposals, and whether they are likely to be a burden to businesses, will depend on how the schemes are implemented.

Potential benefits

5.22 Some respondents commented that, overall, the proposals will benefit transport providers by reducing their costs. A few respondents commented that the scheme will increase business efficiency, through reduced staff time spent on ticketing and because it will ultimately lead to greater use of public transport.

5.23 Some respondents commented that any increased costs to businesses are justified, as they are a necessary part of creating the scheme. A few of these respondents went on to comment that, in the long-term, the benefits will outweigh the costs.

Cost/burden concerns

5.24 Some respondents expressed concerns regarding the costs of the proposals, particularly on smaller transport operators and local authorities. These respondents predicted that the costs of the scheme, particularly the initial outlay, would be high - and might therefore disproportionately affect smaller operators and operations with low profit margins, such as in rural areas. They suggested that this might lead to smaller operators refusing to participate in the scheme; having to reduce the size of their operation; or exiting the market entirely. Respondents also commented that, where passenger numbers are low, the costs of the scheme might outweigh the benefits.

“The potential for high level costs to be passed on to small operators may cause a reluctance to both participate in smart ticketing or deter new entrants to join the industry. Awareness of local authority financial positions must also be recognised.” (Local Authority)

Mitigation suggestions

5.25 Some respondents made suggestions regarding how to mitigate costs. These suggestions included having government subsidies for any transport operator which is struggling to meet the costs; using gated stations and penalty fares to help avoid fare evasion and to pay for increased costs; and sharing the costs burden between organisations.

Question 11: Privacy - Are there any likely impacts the proposals contained in this Consultation may have upon the privacy of individuals?

5.26 Question 11 asked respondents about any potential impacts of the scheme on the privacy of individuals.

5.27 There were 112 responses were received to question 11. The following section reports on these comments, relevant points made in responses to other questions, along with pertinent comments made in responses that did not follow the consultation questions structure.

Sufficient consideration

5.28 Some respondents commented that they do not believe that the proposals will impact on the privacy of individuals. A few respondents referenced the London Oyster card as an example of good practice.

Privacy concerns

5.29 Some respondents expressed concern regarding the impacts of the proposals on privacy. Respondents commented that any data collected about individuals, including personal information and journey data, is vulnerable to misuse - either unintentionally, or through hacking or selling to third parties. A few respondents referenced previous smartcard and ticketing systems as examples of bad practice.

5.30 A few respondents commented that a privacy assessment of the proposals should have been carried out prior to consultation, and that they believe that the issue of privacy has not been taken seriously enough in the proposals.

Mitigation suggestions

5.31 Some respondents caveated their response by commenting that the proposals will not impact upon the privacy of individuals, as long as best practice in data protection is followed.

“Data protection is an ever-increasing area of concern for individuals, meaning that a smart system which requires the storage of personal and financial information related to individuals must have robust and effective safeguards built-in at the point of design.” (Individual)

5.32 Respondents emphasised the need for the new system to comply with the forthcoming EU General Data Protection Regulation (GDPR), especially the ‘privacy by design’ aspect. A few respondents also emphasised the need for strict control over passenger data which are collected, and that data should either not be shared or that sharing should be kept to a minimum and anonymised where possible.

5.33 Some respondents emphasised the need for good data security. A few respondents made more specific suggestions:

- Only essential data should be collected and stored;
- Data should never be used for advertising or sold to third parties; and
- There should be an option to use the system completely anonymously.

6. ADDITIONAL COMMENTS AND SUGGESTIONS

Question 7: Do you have any other comments about the issues raised in this consultation?

- 6.1 Question 7 asked respondents to provide additional comments in relation to the consultation.
- 6.2 There were 120 responses received to question 7. The majority of these comments have been reported on where appropriate in the previous four chapters.

Public transport comments

- 6.3 A few respondents criticised the current state of public transport in Scotland, citing perceived flaws such as a lack of integration, unaffordable prices and unreliability. Other respondents suggested potential ways to improve these perceived issues including improved integration between modes and public ownership.

Consultation process comments

- 6.4 A few respondents praised the consultation process and materials. These respondents commended the fact that the proposals are being consulted on and welcomed the opportunity to give their input. A few respondents also expressed support for the wording of the materials and the consultation questions.
- 6.5 A few respondents criticised the consultation document, commenting that it was too complicated or that it was not written in a way that makes it accessible to a layperson. Others commented that the consultation document did not contain enough relevant information, such as on the cost of the proposals and the exact definition of some technical terms, for respondents to make an informed answer. A few respondents also criticised the wording of some of the questions, suggesting that they were unclear or had been written in a biased or leading fashion.
- 6.6 Respondents also made a few suggestions regarding the consultation document, included purported factual corrections and clarifications. They also made suggestions regarding how the consultation document could be made easier to read and interact with, especially when responding online.

ANNEX 1: GROUP RESPONDENTS

The 17 organisations who requested that their names should not be published are not included in the table below.

Table 18: Group respondents

Group respondent	Group type
Aberdeen City Council	Local Authorities
Aberdeenshire Council	Local Authorities
British Transport Police	Other Public Bodies
Bus Users Scotland	User Groups
Citizens Advice Scotland	Other Public Bodies
Confederation of Passenger Transport (CPT)	Transport Operators
Dundee City Council	Local Authorities
FirstGroup plc	Transport Operators
Get Glasgow Moving	Campaign Groups
Global Travel Ventures Ltd	Transport Industry
ITS United Kingdom	Transport Industry
Mairi Gougeon MSP	Political parties and representatives
McGill's Bus Service Ltd	Transport Operators
Mobility and Access Committee for Scotland (MACS)	Other Public Bodies
Moray Council	Local Authorities
Mydex CIC	Transport Industry
Nevis Technologies Limited	Transport Industry
NO2ID Scotland	Campaign groups

Group respondent	Group type
North Ayrshire Council	Local Authorities
North Lanarkshire Council	Local Authorities
Parkgate Consultants Limited	Transport Industry
Paths for All	Third Sector
Perth & Kinross Council	Local Authorities
Renfrewshire Council	Local Authorities
SCOTS (Society of Chief Officers of Transportation in Scotland)	Other Public Bodies
Scottish Borders Council	Local Authorities
Sustran	Regional Transport Partnerships
South West of Scotland Transport Partnership (SWestrans)	Regional Transport Partnerships
Stagecoach Group Plc	Transport Operators
Stirling Council	Local Authorities
Strathclyde Partnership for Transport	Regional Transport Partnerships
Transport Focus	User Groups
Young Scot	Other Public Bodies



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ISBN: 978-1-911582-33-5

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This document is available on the Transport Scotland website: www.transport.gov.scot
Published by Transport Scotland, March 2018

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