

**Consultation responses between June and September 2025**

**1. INTRODUCTION**

- 1.1 The purpose of this report is to update Members on SEStran's response to consultations between June and September of this year.
- 1.2 In terms of the List of Officer Powers, para 3.14, there was insufficient time to bring the consultations to the Board before their closing dates.
- 1.3 The responses form appendices 1 and 2 of the report. A brief summary is provided below.

**2. RESPONSES**

- 2.1 Transport Scotland Scottish Bus Open Data 21<sup>st</sup> June 2025  
SEStran views the Scottish Government's Bus Open Data consultation as a positive move toward enhancing public transport. By requiring the release of real-time and static data by bus operators—like fares, timetables, routes, and accessibility—the initiative supports digital transformation and aligns with the Transport (Scotland) Act 2019 and SEStran RTS, aiming to improve transparency, accessibility, and passenger experience.
- 2.2 Public Transport Ticketing Block Extension (online submission)  
The UK Secretary of State for Business and Trade has accepted the Competition and Markets Authority's recommendation to extend the Public Transport Ticketing Schemes Block Exemption (PTTSBE) indefinitely, removing its scheduled expiry date of 28 February 2026. An amendment will also be made to the definition of "connecting service" in Article 3 to clarify how the exemption applies to trunk bus services, which operate both long-distance and local routes. Additionally, the revised Order will include a provision requiring the PTTSBE to be reviewed every five years from its commencement date. No other changes were proposed.

Policy Rationale

Competition law aims to prevent anti-competitive agreements (e.g., price-fixing, market division). However, ticketing schemes can offer consumer benefits that outweigh potential competition concerns. The block exemption simplifies compliance for operators and supports integrated public transport.

Scope and Application

The legislation extends to and applies across the entire United Kingdom. It is intended to support sustainable and efficient public transport by facilitating cooperation among operators, which is in alignment with the RTS.

### 2.3 Public Health Scotland Strategy 13<sup>th</sup> August 2025

Public Health Scotland consulted on its strategy for 2025–2035 to help shape the organisation's future direction in public health. The consultation:

- Gathered input from stakeholders across Scotland
- Explored priorities for improving public health outcomes over the next decade
- Identified challenges and opportunities in the public health landscape
- Informed the development of policies, programs, and initiatives aimed at building healthier communities

SEStran recognises significant potential for collaboration with Public Health Scotland (PHS) in advancing shared objectives around health equity, accessibility, and sustainable mobility. A key area for joint working is the development of SEStran's emerging Transport to Health Strategy, which seeks to address barriers faced by individuals in accessing healthcare services due to transport limitations.

## 3. **RECOMMENDATIONS**

- 3.1 It is recommended that Members note the content of the report and its appendices.

Keith Fiskien

**Senior Partnership Manager**

26<sup>th</sup> September 2025

**Appendix 1:** Consultation Response – Scottish Bus Open Data

**Appendix 2:** Consultation Response – Public Health Scotland Strategy

Policy Implications	There could be implications for future iterations of the RTS, dependent on further actions by those consulting.
Financial Implications	None.
Equalities Implications	None.
Climate Change Implications	None.

June 2025

## Response to the Scottish Bus Open Data Consultation<sup>1</sup> (March 2025)

The South East of Scotland Transport Partnership (SEStran) is a Statutory Partnership of the Councils of City of Edinburgh, Clackmannanshire, East Lothian, Falkirk, Fife, Midlothian, Scottish Borders and West Lothian.

The Scottish Government's consultation on Bus Open Data (BOD) in SEStran's view, represents a commendable step toward improving transparency, accessibility, and passenger experience in public transport. By mandating the publication of real-time and static data—such as fares, timetables, routes, and accessibility features—the initiative aligns with broader digital transformation goals and the Transport (Scotland) Act 2019.

### Strengths

**Clear Rationale and Legislative Backing:** The consultation is well-grounded in legislation and policy, particularly the 2019 Act, which provides a solid legal framework for mandating open data. The document articulates a clear vision for how BOD can enhance journey planning and increase public transport usage.

**Inclusivity of Stakeholders:** The consultation seeks input from a wide range of stakeholders, including operators, passengers, and technical experts. This inclusive approach is essential for ensuring that the resulting regulations are both practical and user focused.

**Alignment with UK-Wide Standards:** The proposal to align with existing UK data standards (e.g. TransXChange, NeTEx) is a pragmatic move that could facilitate interoperability and reduce duplication of effort for operators working across borders.

### Areas for Improvement

**Implementation Feasibility and Support:** While the consultation outlines what data should be published and in what format, it lacks detail on how smaller or rural operators—who may lack technical capacity—will be supported. Without adequate funding or technical assistance, there is a risk of uneven implementation.

**Enforcement and Compliance:** The document briefly mentions compliance and enforcement but does not elaborate on mechanisms for monitoring or penalising non-compliance and encourage operator compliance. A more robust framework would be necessary to ensure consistent data quality and availability.

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<sup>1</sup> <https://consult.gov.scot/transport-scotland/scottish-bus-open-data-consultation/>

**Passenger-Centric Design:** Although the consultation invites user views, it could go further in embedding user experience principles into the design of data outputs. For example, how will accessibility data be presented to visually impaired users? Will there be multilingual support?

**Data Privacy and Commercial Sensitivity:** While the document states that BOD excludes personal and commercially sensitive data, it does not fully address concerns operators may have about competitive disadvantage. A clearer articulation of data boundaries and protections would help build trust.

The Scottish Bus Open Data Consultation is a positive initiative with the potential to significantly improve public transport accessibility and efficiency. However, its success will depend on how well it addresses implementation challenges, supports smaller operators, and ensures that the data is genuinely useful to passengers. A more detailed roadmap, including funding, enforcement, and user experience considerations, would strengthen the proposal.

## Lessons from England's Implementation of Bus Open Data

England's BODS, introduced under the Bus Services Act 2017, aimed to standardise and centralise the publication of bus timetable, fare, and real-time location data. While the initiative has brought benefits, several implementation issues have emerged:

### Inconsistent Data Quality and Coverage

- **Issue:** Despite the legal requirement, data quality and completeness vary significantly between operators and regions
- **Recommendation for Scotland:** Introduce robust quality assurance mechanisms and provide clear data standards with validation tools to ensure consistency across all operators

### Technical Barriers for Smaller Operators

- **Issue:** Smaller and rural operators in England have struggled with the technical and financial burden of compliance
- **Recommendation:** Scotland should offer centralised support services, such as shared data publishing platforms or grants for software procurement, to reduce the burden on smaller operators

### Limited Passenger Awareness and Use

- **Issue:** While data is available, public awareness and use of apps powered by BODS data remain limited outside major cities
- **Recommendation:** Develop and invest further in public-facing journey planning tools like Traveline and awareness campaigns to ensure the data translates into real passenger benefits

### Fragmented Stakeholder Engagement

- **Issue:** Some English local authorities and operators felt excluded from early design and decision-making processes

- Recommendation: Scotland should maintain ongoing, structured engagement with all stakeholders—including passengers, operators, and tech developers—throughout the implementation process

#### Enforcement and Compliance Gaps

- Issue: Enforcement of data publication requirements has been inconsistent, with limited penalties for non-compliance
- Recommendation: Establish a clear enforcement framework with defined penalties and incentives to encourage compliance

### Data Management Recommendations

#### Centralised Data Portal

A national open data portal (like England’s BODS platform) should be established to host and validate data from all operators.

SEStran could propose a regional mirror or API gateway to support local integration and resilience, building on the existing regional systems that already exist and supports and enhances national platforms like Traveline.

#### Data Validation and Quality Assurance

Implement automated validation tools for TXC, SIRI, and NeTEx data before publication. Provide feedback dashboards for operators to monitor data quality and compliance.

#### Update Frequency and Version Control

Static data (e.g. timetables, fares): Updated at least every 28 days or when changes occur.

Real-time data: Updated every 30 seconds to 1 minute.

Use version control to track changes and support auditing.

#### Operator Support and Onboarding

Provide technical toolkits, templates, and training for operators—especially SMEs and rural providers.

Consider a shared data publishing platform for smaller operators lacking in-house capability.

#### Data Licensing and Access

All data should be published under an Open Government Licence (OGL) or equivalent to encourage third-party innovation.

Ensure clear metadata and documentation accompany each dataset.

### Linking the BODs Consultation to SEStran’s Regional Transport Strategy<sup>2</sup>

#### Enhancing Regional Bus Strategy Delivery

SEStran is currently developing a Regional Bus Strategy to improve service quality, integration, and accessibility. The BODs framework—by mandating the publication of

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<sup>2</sup> <https://sestran.gov.uk/sestran-2035-regional-transport-strategy/>

standardised data on timetables, fares, and accessibility—can directly support this strategy by:

- Enabling real-time service monitoring
- Supporting data-driven planning for underserved areas
- Facilitating multi-operator journey planning, especially across council boundaries.

#### Supporting Rural and Peripheral Connectivity

SEStran's region includes rural areas like the Scottish Borders and Clackmannanshire, where bus services are often infrequent or fragmented. Open data can:

- Help identify gaps in service provision
- Enable community-led transport solutions (e.g. DDRT) by providing access to live data
- Improve transport to health planning by integrating with NHS and local authority systems

#### Building on Digital Innovation (e.g. GoSEStran)

Although the GoSEStran MaaS pilot was discontinued, it demonstrated the potential of digital platforms to integrate transport services. The BODs framework can:

- Provide the data backbone for future MaaS or journey planning tools
- Ensure interoperability with UK-wide platforms, avoiding duplication of effort
- Encourage third-party innovation by making data openly available

#### Addressing Known Implementation Challenges

SEStran can use its regional coordination role to:

- Support smaller operators with technical and financial resources
- Coordinate data quality assurance across local authorities
- Engage stakeholders early to ensure the BODs framework meets local needs

The BODs consultation is not only aligned with SEStran's RTPI ambitions—it is a critical enabler. By mandating open, standardised, and high-quality data, BODs provide the foundation for a scalable, inclusive, and integrated RTPI system across the South East of Scotland. This will enhance passenger confidence, reduce wait times, and improve accessibility—especially in rural and underserved communities.

The BODs consultation is not just a compliance exercise—it's a strategic enabler for SEStran's goals around sustainable, inclusive, and digitally connected transport. By aligning BODs implementation with regional priorities, SEStran can ensure that open data delivers real value for passengers, operators, and planners alike.

## ITEM B2 APPX 2

### Shaping our strategy: 2025-35

### PHS consultation response

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#### 1. Opportunities for Collaboration

SEStran recognises significant potential for collaboration with Public Health Scotland (PHS) in advancing shared objectives around health equity, accessibility, and sustainable mobility. A key area for joint working is the development of SEStran's emerging Transport to Health Strategy, which seeks to address barriers faced by individuals in accessing healthcare services due to transport limitations.

PHS's expertise in public health data, health inequalities, and community engagement would be invaluable in shaping this strategy. Collaborative opportunities include:

- Integrating health intelligence into SEStran's transport planning tools and decision-making frameworks.
  - Co-hosting stakeholder engagement sessions to ensure lived experience informs policy.
  - Where collaborative working is appropriate, supporting the expansion and facilitation of the Transport to Health Learning Network, which provides a platform for cross-sector dialogue and innovation.
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#### 2. Challenges and Barriers

Achieving the ambitions outlined in PHS's strategic vision will require overcoming several systemic and operational challenges:

- Fragmentation of responsibilities and funding across transport and health sectors can hinder coordinated action and long-term planning.
- Resource constraints within local authorities and health boards may limit capacity to engage in regional initiatives or pilot new service models.
- Data sharing and integration between transport and health systems presents both technical and governance challenges, particularly around privacy and interoperability.
- Cultural and institutional silos may impede the development of shared language and priorities between sectors.

Addressing these barriers will require sustained commitment to partnership working, supported by national leadership and policy alignment.

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#### 3. PHS's National Role: Adding Value

Public Health Scotland is well-positioned to enhance SEStran's work through its national remit and analytical capabilities. Specific contributions could include:

- Provision of detailed public health intelligence to inform transport planning, particularly in identifying and addressing transport-related health inequalities.
- Open data and clear pathways to anonymised data which could inform transport policy and specifically Transport to Health strategizing.
- Development of evaluation frameworks that measure the health impacts of transport interventions, enabling SEStran to demonstrate value and secure investment.
- Advocacy at the national level for transport as a determinant of health, helping to embed health outcomes within transport policy and funding decisions.

By acting as a strategic partner and evidence provider, PHS can help ensure that transport initiatives contribute meaningfully to public health goals.

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#### 4. Strengthening Collaboration

To further develop and strengthen collaborative working, PHS may wish to consider the following approaches:

- Facilitating joint training and capacity-building initiatives to foster mutual understanding and shared priorities across sectors.
- Supporting co-production with communities, particularly those experiencing transport disadvantage, to ensure that interventions are inclusive and responsive to need.

Such measures would help build trust, enhance coordination, and accelerate the delivery of integrated solutions.

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#### 5. Maintaining Strategic Engagement

To ensure continued alignment and effective delivery of shared objectives, SEStran recommends the following mechanisms for ongoing engagement with PHS:

- Regular participation in the Transport to Health events led by RTPs, which serves as a key forum for cross-sector collaboration.
- Joint involvement in delivery planning workshops, particularly those related to SEStran's Regional Transport Strategy and associated project prioritisation.

These actions will help maintain momentum, foster strategic alignment, and ensure that health considerations remain central to transport planning and delivery.

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