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Submission to Consultation:

**Bus Services (Wales) Act 2026: proposals for regulations on
local bus services contracts, the application of TUPE
regulations and the provision of information and data**

Questions 1 and 2 relate to Part 1 of the consultation

1. Are there any requirements you consider essential that should be set out in the contract regulations?

Yes ☒

No ☐

If yes, please specify these and explain why.

Yes.

Under franchising, the Welsh Ministers become responsible for passenger information and for network performance, but the data needed for both is generated on operators' vehicles and held in operators' and suppliers' systems. That dependency should be written into every contract as a baseline term, not negotiated lot by lot..

Every contract should include terms on the following.

1. **Provision of operational data to TfW.** A duty to provide, continuously and to a national technical specification referenced by the contract (see Question 2): real-time vehicle location; the allocation of vehicles to journeys; actual running times; cancellations, part-cancellations and short workings; and disruption information. The contract should oblige the operator to keep the equipment and maintain the data feeds, not merely to fit the equipment.
2. **Identifier integrity.** A duty to use the service, journey, block (vehicle working) and vehicle identifiers identically across timetable, location and ticketing data. In England only a proportion of Bus Open Data Service (BODS) location data can be matched to timetables, and match rates remain a material constraint on the accuracy of real-time predictions. Franchising gives Wales the opportunity to avoid that problem from the outset: TfW will specify the timetable and vehicle workings, so it can issue the identifiers and require them to be used consistently. This should be an enforceable term, not guidance.
3. **Data ownership, rights and onward use.** All data generated in performing the contract (location, ticketing transactions, passenger counts, disruption records) should be owned by the Welsh Ministers, or licensed to them irrevocably, with the right to share it with third parties and to publish it openly, subject to data protection law. Operators should be required to secure equivalent rights, including export in open formats, in their own contracts with system suppliers. Without this, the section 29 duty to make information available will depend on the terms of individual contracts, and on suppliers' licence conditions.
4. **Responsibility for on-vehicle technology.** The consultation sets out responsibilities for ticketing machines (TfW supplies, the operator maintains). The same clarity is needed for location and telematics units, next-stop audio-visual equipment required by the Public Service Vehicles (Accessible Information) Regulations 2023, passenger counting equipment, CCTV, Wi-Fi

and any bus priority equipment. For each: who supplies, owns and maintains it; the required availability; fault reporting and repair times; the fallback when it fails; and who pays for mobile data connectivity. Coverage gaps in rural Wales mean equipment should buffer and forward data rather than lose it though this may be a requirement with a lead in time to allow suitable development to take place to support the requirement.

5. **Data quality and timeliness as measured performance.** Key performance indicators should include data measures, such as the proportion of journeys tracked, the proportion matched to the timetable and the timeliness of cancellation reporting, because the quality of passenger information depends on them.
6. **Passenger information on vehicles and during disruption.** Destination displays and next-stop announcements consistent with the network's timetable and stop data, using NaPTAN stop names, including Welsh-language names, so that what a passenger hears on board matches the journey planner and the stop. Bilingual provision should be consistent with the Welsh language obligations that will apply to services secured by the Welsh Ministers. Contracts should also cover information to drivers and passengers during diversions and disruption, and the recording and reporting of customer feedback and complaints.
7. **Connections.** Paragraph 1.13 proposes provision to facilitate connections. In practice, protecting a connection needs real-time data about the feeder service and a defined route for instructions from TfW's control function to the driver. Contracts should require operators to support that exchange, or the connection commitment will exist only on paper.
8. **Cyber security and data protection.** Ticketing data can include card and QR token identifiers, which are personal data. Contracts should set out controller and processor roles, a baseline security standard, incident notification, and retention periods.
9. **Mobilisation, transition and exit.** The four-stage regional rollout means data will move between operators, suppliers and TfW repeatedly. Contracts should require handover at start and end of the contract, in specified formats and within defined periods, of equipment configurations, vehicle workings, historic performance and patronage data, and stop data, together with a duty to co-operate with the incoming operator. The quality of data at handover determines the quality of the next procurement, and of the workforce information needed under Part 3.
10. **Cross-border services.** Where a contracted service runs into England, the English section remains subject to the Public Service Vehicles (Open Data) (England) Regulations 2020. The contract should state who publishes to BODS for that section.

Finally, we recommend that the Welsh Ministers use their powers to set out a **standard form for the data, information and systems terms**. Consistency

matters more here than anywhere else in the contract: every variation between contracts becomes a separate integration that operators and suppliers must build and maintain, and a separate source of inconsistency in the data passengers receive.

2. Are there any elements we have outlined that would be better addressed through individual contracts rather than the contract regulations?

Yes ☐

No ☒

If yes, please specify which elements, and explain your reasoning.

We broadly agree with the proposed division. Our concern runs the other way: some matters risk being left to individual contracts when they need to be set once, nationally. We suggest three layers rather than two.

Layer	What belongs there
Regulations	That a term must exist: the eight themes, plus the data, information and systems theme proposed at Question 1.
National technical specification and definitions , maintained by TfW under published change control and referenced by every contract	Data formats and profiles; identifier rules; KPI definitions and measurement methods; equipment and interface specifications; the facility and accessibility vocabulary; the cyber security baseline.
Individual contracts	Service-specific values: routes, timetables, KPI targets and thresholds, incentive rates, payment detail, and which facilities are provided on which vehicles.

The middle layer is the important one. Technical standards change too often to be set in regulations, and the consultation is right about that. But if they are left to individual contracts they will diverge by lot and by region, suppliers will build and maintain variants, and the comparison of performance across operators envisaged at paragraph 1.27 will not be possible.

On the specific elements proposed:

- **Service specification.** We agree the detail belongs in contracts. The *form* of the specification should, however, be standard: the service specification should be held as machine-readable timetable data (TransXChange now, NeTEx in future), not as a document schedule that is later re-keyed. Once

registration ends, the contract specification becomes the definitive description of the service, so the data and the contract should be the same thing.

- **Vehicles and facilities.** We agree that each contract should determine which facilities are provided. The *vocabulary* used to describe facilities and accessibility features should be national, and we recommend the existing NeTEx vocabularies rather than new Welsh or UK lists, so that facility information is comparable across operators and usable by journey planners.
- **Performance management.** We agree that targets and incentives belong in contracts. The *definitions* should not. What counts as on time, which timing points are measured, whether location or ticketing data is the measurement source, and how lost mileage is attributed should be set once. Otherwise the same service will score differently under different contracts. We suggest the regulations require contracts to use the national KPI definitions.
- **Ticketing and fares.** With TfW supplying the ticketing machines, the technical interfaces between the ticketing machine, the location system, next-stop equipment and driver log-on should be defined once in the national specification, not per contract.
- **Record keeping.** We agree that detailed arrangements belong in contracts. However, we suggest the regulations set a minimum retention period for operational and performance data, bus longer than the five-year period, so that data needed for future network planning and re-procurement is not lost between contracts.

RTIG takes no position on payments, or on education and training, which operators, authorities and employee representatives are better placed to address.

Questions 3 to 7 relate to Part 2 of the consultation

3. Do you consider there is anything missing from the table in Annex 2?

Yes ☒

No ☐

Any comments

Yes. The table is a sound starting point and covers most of the right subject areas. We comment first on how the requirements are expressed, then on specific additions.

How the requirements are expressed

- **Specify the standard, not only the subject.** We accept that formats will not be written into the regulations. Each notice should, however, name the published standard and profile: TransXChange on the BODS PTI profile for timetables and vehicle workings; SIRI-VM as used by BODS for location; the NeTEx UK Fares Profile for fares; NaPTAN ATCO codes for every stop reference. Annex 1 refers to TransXChange's use for electronic bus service registration. Once section 38 is commenced, that use ends in Wales for contracted and permitted services, and the profile that matters becomes the publication profile.
- **Accept existing publication.** Where an operator already provides data to BODS or the Welsh Bus Data Service (WBDS) in these standards, that feed should satisfy the notice. Cross-border operators should not have to maintain two regimes for the same service, and the Welsh and English requirements should be kept aligned for that reason.
- **Distinguish three kinds of requirement.** Continuous operational feeds (location, ticketing transactions, disruption), periodic returns (financial, workforce, vehicle lists) and one-off baseline requests (historic data, asset information) need different notice designs, different timescales and, as we set out at Question 5, different ways of handling problems.
- **Specify the identifiers that join the datasets.** The table lists datasets separately, but their value comes from joining them: timetable to vehicle working, vehicle working to location, location to ticketing transaction, transaction to vehicle. The regulations should list the linking identifiers as required information in their own right: National Operator Code; line and service codes; journey codes; block or running-board numbers; one persistent vehicle identifier used identically in location, ticketing and vehicle-list data; and NaPTAN ATCO codes for all stops, including boarding and alighting locations in ticketing data. Without them TfW will face the same fuzzy matching problem the English sector currently has to work around.

Specific additions

Timetables and operations

- **Historic actual running data.** The table asks for real-time location but not the historic record. Operators and their suppliers hold archives of location data and stop-level actual arrival and departure times. These are the best available baseline for runtimes and punctuality, which is the stated purpose of the location data requirement, and section 27(2)(b) allows up to five years of history to be requested.
- **Crew schedules (driver duties).** Vehicle workings are included; driver duties are not. Duty data (paid hours, spreadover, relief points) drives operating cost and resource modelling, including the weekend and evening workforce constraints cited in the workforce rationale. It is also the most reliable way to identify which staff work on which services for the TUPE process in Part 3.
- **Depot allocation.** Which depot operates which services and vehicles, and, for zero-emission fleets, charging infrastructure (number and power of chargers, grid capacity). This is directly relevant to lotting, the Residual Value Mechanism and fleet strategy.
- **Subcontracted and hired-in operation.** Identification of journeys operated by a subcontractor or with hired-in vehicles, so that data gaps can be explained and attributed correctly.
- **Complete operating calendars.** School term dates, bank holiday patterns and dates of non-operation, which are frequently incomplete in timetable files and are the source of many passenger-facing errors.

Disruption

- Extend beyond cancellations and skipped stops to part-cancellations and short workings, diversions (with stops not served and temporary stops used), significant late running, replacement vehicles, and planned disruptions such as roadworks and events.
- Require a **cause code** for each event. The table's rationale is to identify mitigation measures with operators and local authorities; that depends on distinguishing causes within the operator's control from highway, traffic and external causes.
- Define the event types precisely, following SIRI-SX and SIRI-ET semantics, so that the same event is reported the same way by every operator.

Passenger demand and revenue

- **Automatic passenger counts** (boardings and alightings) where counting equipment is fitted. Ticketing data records boardings only; alightings "where known" normally come from counting equipment or tap-out.
- **Data held by suppliers on the operator's behalf.** Contactless capping records, app sales and account-based ticketing data are often held by payment service providers or back-office suppliers. The regulations should make clear that data held on the operator's behalf is within scope (see Question 4).

- **Demand-responsive transport.** The table includes met demand; network planning needs **unmet demand** as well: refused or unfulfilled booking requests, booking lead times, requested against actual pick-up times, and wheelchair-accessible requests. Booking data for fflexi and similar services is typically held on the booking platform.

Vehicles

- **Persistent vehicle identifier** (fleet number) as used in location and ticketing data, linked to the registration mark.
- **Propulsion and emissions:** fuel or power type, emission standard, and battery capacity and range for battery-electric vehicles. These bear directly on fleet strategy and the Residual Value Mechanism.
- **Ownership status:** owned, leased or on hire purchase, and the lessor. "Use of vehicles" is too general to support the Residual Value Mechanism.
- **On-board technology fitted:** location and telematics unit, next-stop audio-visual equipment (and compliance with the Accessible Information Regulations 2023, which is separate from PSVAR), ticketing machine, passenger counting, contactless readers and bus priority equipment, with make, model and supplier. This is essential for transition planning.
- **Accessibility and facilities in a standard vocabulary:** in addition to wheelchair spaces, buggy space, ramp or kneeling capability, hearing loop and priority seating, recorded using NeTEx vocabularies so that data from different operators is comparable.

Systems and data inventory (new row)

- The systems each operator uses for scheduling, location and real-time, ticketing back office, passenger counting and booking; the supplier; contract end dates; export capability; and data licence terms. This is cheap to provide and of high value: it shows TfW where data sits with third parties, where lock-in risks exist, and what must be migrated at the start of each regional franchise.

Customer feedback

- Volumes of complaints and customer feedback by category and service. These are a useful indicator of overcrowding, reliability and information problems, and section 27(4) is not an exhaustive list.

Assets and amenities

- Include operator-owned real-time displays and other information equipment at stops and interchanges, with their data sources, alongside flags and timetable cases.

Data quality information

- For each dataset, its provenance, the system it came from, known gaps and the period covered, so that TfW can judge fitness for purpose before relying on it.

Items that need care

These are not omissions, but they should be addressed before the regulations are made.

- **Token identities.** Smart card numbers, QR references and contactless tokens are personal data. TfW should specify consistently pseudonymised tokens rather than raw identifiers, and publish a data protection impact assessment covering Annex 2.
- **Workforce data for small operators.** Averages by role and male/female splits can identify individuals where an operator employs only a handful of staff in a category. Minimum group sizes should be applied.
- **Driver identifiers.** Ticketing machines record driver log-on identifiers. These should be excluded from ticketing data returns or pseudonymised.
- **Vehicle registration marks with location.** A registration mark associated with continuous location can reveal an individual driver's movements. Providing it to TfW is reasonable; it should not be published alongside location data when the second tranche of regulations is made.
- **Provide versus publish.** Several Annex 2 items (costs, revenue, workforce) are commercially sensitive. As in England, RTIG's members hold differing views on whether such data should be published, and RTIG takes no position on that question. We do ask that the regulations use the power in section 27(5)(b) to state explicitly how information provided to the Welsh Ministers may be used and disclosed, so that the distinction between *provided to government* and *published* is settled in regulations rather than by system design or by default.

4. What scenarios could prevent an operator from providing information included in the table in Annex 2?

Any comments

This is properly a question for individual operators, and we have encouraged members to answer it from their own circumstances. The scenarios reported to RTIG by operators and the supplier community fall into six groups.

1. **The data has never been captured.**

- Small operators without scheduling software hold timetables as documents or spreadsheets, cannot produce TransXChange, and may not record vehicle workings formally at all, allocating vehicles day by day.
- Vehicles without location equipment, older ticketing machines without GPS or connectivity, and location systems not linked to ticketing or driver log-on.
- No passenger counting equipment, so alightings are unknown.

- Costs accounted at company or depot level and not allocated to services. Service-level cost data requires an allocation methodology that most operators do not have and that would need to be specified.
- Community transport and demand-responsive operators using paper or telephone booking, often supported by volunteers.

2. The data is held by someone else.

- Hosted supplier systems for location, ticketing back office, scheduling, booking, apps and payments, where the operator's contract restricts export, charges for it, or provides only summary reports rather than raw data.
- Multi-operator ticketing data held by scheme administrators, and off-bus sales held by third-party retailers or payment providers. The operator may see only its reimbursement. Some of these bodies are not operators and so may fall outside section 27 altogether.
- Data held at group level covering both English and Welsh operations, so that Welsh-only figures for costs, staff and vehicles moving between depots require apportionment.
- Data held by a subcontractor.
- Data the Welsh Government, TfW or local authorities already hold, such as concessionary travel data. Operators should not be asked to return it.

3. The data no longer exists.

- Detailed transaction and location data is often kept for months rather than years, sometimes for data protection reasons, and historic data is frequently lost when systems or suppliers change.
- Former operators that have ceased trading, become insolvent, been sold or merged, or lost the staff who understood the records.

4. The data cannot lawfully be provided in the form requested.

- Personal data in identifiable form, such as raw token identifiers, driver identifiers and small-cohort workforce data, where a pseudonymised or aggregated form would meet the purpose.
- Supplier licence terms and third-party confidentiality obligations.

5. Continuous feeds are interrupted.

- Equipment faults, mobile coverage gaps, supplier outages and cyber incidents.
- The changeover to TfW-supplied ticketing machines, during which data may be split between two systems.
- Identifiers that are inconsistent between systems, so the data exists but cannot be reliably joined.

6. Capacity and timing.

- Small operators with no data or IT staff; several notices arriving together; requests timed at peak periods such as September school changes; and the cost of extraction.

We suggest the following to reduce these barriers.

- **Tell operators now what historic data will be requested**, so they can retain it. Much of the five-year history the Act allows will be deleted under routine retention policies before a notice arrives.
- **Frame historic requests as "information held"**, with a clear route to explain gaps, so that data that never existed is not treated as non-compliance.
- **Accept existing BODS and WBDS feeds** as meeting the requirement.
- **Provide tools**, including a free route for small operators to create standard timetable data, and templates for periodic returns.
- **Engage suppliers centrally**. The number of relevant system suppliers in Wales is small, and TfW could agree standard data access and export arrangements with them once, rather than each operator negotiating separately. RTIG would be glad to help convene that engagement.
- **Use contracts and permits** to require operators to hold data access and export rights in their supplier contracts in future (see Question 1).
- **Provide a notification route for temporary inability** to supply continuous feeds, distinct from non-compliance (see Question 5).
- **Apply proportionate thresholds** for the smallest operators and for section 19 services.

5. Is this a reasonable and proportionate approach for enabling operators to appeal notices? You may want to consider:

- the proposed grounds for appeal
- whether the approach strikes an effective balance between protecting operators and minimising unnecessary cost or delay

Yes ☒

No ☐

Any comments

Broadly, yes. The dialogue stage before any appeal is the most important element of the process, and the proposed grounds are sensible. We suggest the following refinements.

The process

- **Formalise the dialogue stage**. Set a defined window for representations (for example 14 days) and require a written TfW response with reasons (notice upheld, amended or withdrawn), so that the dates for any appeal are clear. Large or novel requests would benefit from being issued in draft first.

- **Allow partial appeals and require interim compliance with the rest.** Figure 1 shows the operator required to provide the information as per the current notice, and then disputing the notice as an alternative branch. The regulations should make clear that an appeal against part of a notice suspends the compliance deadline for the disputed items only, and that undisputed items must still be provided on time.
- **Set time limits and align the two appeal routes.** Specify the period within which an appeal must be brought. Make clear that enforcement by the traffic commissioner under section 32, and the appeal route to the Upper Tribunal under section 33, cannot proceed in respect of items under live appeal to the First-tier Tribunal.
- **Treat continuous feeds differently.** A notice requiring continuous location, ticketing or disruption data is effectively a standing notice, and circumstances change: equipment fails, suppliers change, services are restructured. A tribunal appeal is the wrong instrument for these cases. The regulations should allow an operator to notify TfW of a temporary inability to comply, with a remediation plan, and allow TfW to vary the notice, without either party having to go to tribunal.
- **Add a technical review step.** Many disputes will concern feasibility and format: whether a particular system can export particular data in a particular form. These are best resolved quickly by technical discussion between TfW, the operator and its supplier, with independent technical input where needed, before a tribunal becomes involved.

The grounds

- **(a) Not lawfully issued.** Clarify that this includes information not of a kind specified in the regulations, information not needed for a relevant function (section 27(3)), and information outside the five-year limit (section 27(2)(b)).
- **(b) Disproportionate or not held.** We support this ground. It should make clear that information held by a supplier on the operator's behalf counts as held, and that the operator is expected to use reasonable endeavours to obtain it. Requesting personal data in identifiable form where a pseudonymised or aggregated form would meet the purpose should also be treated as disproportionate.
- **(e) Procedural requirements cannot be met.** We support this ground, but the normal remedy should be a varied notice accepting the form in which the information is held, not quashing. The Tribunal's power to substitute a notice supports this.
- **Commercial confidentiality.** Rather than creating a further ground, the regulations should use section 27(5)(b) to set clear rules on the use and onward disclosure of information provided. If those rules are in place, confidentiality concerns need not be litigated notice by notice.

Figure 1 refers to paragraph 3.20 for the grounds of appeal; we assume paragraph 2.19 is meant.

Balance

With these refinements, we consider the approach strikes a reasonable balance. We would also encourage the Welsh Government to:

- publish anonymised statistics on notices issued, disputed and resolved, which will build confidence in the process;
- issue each notice with a standard template, a data dictionary and example files; and
- continue the training and support described at paragraph 2.20, which will prevent more appeals than any drafting of the grounds.

6. Having considered the table in Annex 3 of the consultation, is there anything you consider missing?

Yes ☒

No ☐

Any comments

Yes. Several local authority datasets directly underpin passenger information and the accuracy of real-time predictions, and RTIG's members include many of the authorities and suppliers who maintain them. We suggest the following additions.

1. **NaPTAN: keep it national, complete and bilingual.** We support local authorities providing accurate NaPTAN data. Welsh stop data should continue to be maintained in the single GB NaPTAN dataset, not in a separate Welsh copy, because journey planners, BODS and cross-border operators all depend on it. TfW's GIS bus stop asset database should use NaPTAN ATCO codes as its key and feed updates back to NaPTAN, and the roles of TfW and each authority in maintaining stop records should be clear, so that each stop has one maintainer. Beyond the NaPTAN minimum, the table should include:
 - Welsh and English stop names, which feed bilingual next-stop announcements;
 - stop accessibility (kerb height, step-free access, tactile paving, shelter, seating, lighting);
 - bay and stand allocations at bus stations; and
 - temporary stop closures and relocations.
2. **Real-time information infrastructure.** The infrastructure row covers physical stop assets but not the real-time information estate. It should include at-stop and interchange displays (location by ATCO code, type, supplier, communications method, data source, maintenance arrangements and age); the real-time back-office systems authorities operate; contract end dates and data rights; and the historic location and prediction archives those systems hold, which provide a valuable punctuality baseline. If WBDS is to reduce the need for authorities to run separate real-time systems, TfW will need this inventory to plan the migration without displays going blank.
3. **Bus priority and traffic signal systems.** The existing row focuses on planned enhancements. It should also cover existing assets and their data interfaces: junctions with bus priority, the detection method (for example location-based virtual detection or roadside transponders), traffic control system suppliers, priority request interfaces, and bus lanes and gates with their hours of operation and enforcement. Bus priority depends on a reliable data interface between vehicle location and signal systems, and that interface is easiest to specify when the existing estate is known.
4. **Streetworks, road closures and events, in advance and in machine-readable form.** For passenger information the need is operational and continuing, not one-off: forward notice of roadworks, closures, events and

temporary stop suspensions, in a structured form (for example DATEX II or SIRI-SX), so that disruption information can reach passengers before the disruption does.

5. **Home-to-school and learner travel.** Dedicated school transport contracts, routes, pick-up points, aggregated pupil numbers, school start and finish times, term dates, and planned changes to school hours. Many local bus services are timed around schools, and the Welsh Bus Network Plan cannot integrate the two without this information. "Routes and timetables tendered by local authorities" may not capture dedicated school contracts. Only aggregated data should be requested about pupils.
6. **Active travel routes and related facilities.** Section 28(4)(f) expressly allows this, but Annex 3 omits it. Local authorities already hold active travel network maps under the Active Travel (Wales) Act 2013. These, together with cycle parking at stops and interchanges, support first- and last-mile planning and journey planning.
7. **Development pipeline.** Planned housing, employment, health and education developments, and developer-funded bus service and infrastructure obligations, so that the network plan anticipates demand rather than following it.
8. **Interchanges, bus stations and park and ride sites.** Ownership, departure stand allocation, facilities and operating hours.

Two further points on how this information is collected.

- **Specify reference formats.** "GIS file" should become a specified open format (for example GeoPackage or GeoJSON) keyed on NaPTAN ATCO codes, so that stop, infrastructure and asset data from different authorities can be combined without manual matching.
- **Make it easy for community councils.** Many own shelters and timetable cases but hold little structured data. A simple template or a TfW-run survey tool will produce better results than a notice specifying a format they cannot produce.

We would also encourage the Welsh Government to consider, in the second tranche of regulations, publishing stop and infrastructure reference data openly, so that operators, journey planners and suppliers all work from the same source.

7. What scenarios could prevent a local authority or community council from providing the information in Annex 3?

This is properly a question for individual local authorities and community councils, and we have encouraged members to answer it directly. From RTIG's work with authorities and their suppliers, the main scenarios are:

1. **The data is not held in structured form.**

- Bus stop assets recorded in highway asset systems without NaPTAN ATCO codes, or on paper, so records cannot be matched to stops.
- Installation, inspection and maintenance dates not recorded, or held only in contractors' job records.
- Community councils with part-time clerks and no asset register, whose knowledge of shelters and timetable cases is informal.

2. The data sits with a contractor or another body.

- Real-time displays and back-office systems operated by suppliers under service contracts, where the authority's rights to export configuration and historic data are unclear.
- Shelters provided and maintained by advertising contractors under concession agreements, where ownership and maintenance records sit with the contractor and the agreement may contain confidentiality terms.
- Traffic signal and bus priority configurations held by signal maintenance contractors.
- Regional arrangements, where transport planning data is held by a Corporate Joint Committee or regional partnership rather than by each council. The regulations should make clear whether such bodies are within scope.

3. The data is spread across departments. Transport, highways, education (learner travel), planning and finance each hold part of what Annex 3 asks for, often with no single owner, so one notice may need co-ordination across several services.

4. Financial data is not recorded in the form requested. Bus support funded from non-hypothecated budgets is often not separately identified; spend on stops sits within wider highway maintenance budgets; and season ticket allocations may be administered by schools or colleges.

5. The data is out of date or incomplete. NaPTAN records in some areas have not been systematically surveyed for years. Providing accurate and up-to-date data may require survey work, not just extraction.

6. Legal and licensing constraints.

- Learner travel records contain children's personal data; only aggregated information should be requested.
- Contract prices in live procurements, and third-party agreements, may be commercially confidential.
- GIS datasets derived from Ordnance Survey mapping may carry licence conditions that permit sharing with TfW but restrict onward publication.

7. Capacity and timing. Small transport teams, competing statutory returns and budget-setting cycles; and, for community councils, meeting cycles that mean a notice may not be considered for several weeks.

We suggest the following to reduce these barriers.

- **Align notices with the regional rollout**, so that each authority is asked for data when it is needed for its region, not all at once.
- **Accept data in the form it is held**, with TfW doing the transformation where authorities cannot, and provide templates and a survey tool for stop and shelter data.
- **Build on existing processes**, including NaPTAN maintenance and TfW's current bus stop evaluation work, rather than creating a parallel route.
- **Clarify who is in scope**, including Corporate Joint Committees, advertising and maintenance contractors, and system suppliers, and allow an authority to meet a notice by directing TfW to data held on its behalf.
- **Recognise the resource cost**, particularly of stop surveys, and consider funding it.

Question 8 to 10 relate to Part 3 of the consultation

8. Consider the process outlined in Part 3 of the consultation and in the flowchart (fig 2). Do you think this is appropriate to ensure the effective identification and allocation of the eligible local bus service workforce under franchising?

Strongly agree ☐

Agree ☐

Neither agree nor disagree ☐

Disagree ☐

Strongly disagree ☐

Any comments

9. When determining whether an individual is eligible to transfer, is “at least half of working time” a fair default position?

Yes ☐

No ☐

Any comments

10. Do you foresee any potential implications arising from the proposed process for bus services other than local bus services?

Yes ☐

No ☐

Any comments

11. What, in your opinion, would be the likely effects of the proposals outlined in this consultation on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English.

- Do you think that there are opportunities to promote any positive effects?
- Do you think that there are opportunities to mitigate any adverse effects?

Any comments

RTIG's interest is in passenger information, which is where the Welsh language is seen and heard most in the bus system: destination displays, next-stop announcements, stop flags, real-time displays, journey planners and disruption messages. All of these are generated from data, so the proposals will have a significant, if indirect, effect on the Welsh language.

Opportunities for positive effects. For the first time, the Welsh Ministers will control the network's timetable, stop and vehicle data, and will set contract terms for the information shown on vehicles (section 11(2)(h)). That makes it possible to deliver consistent bilingual information across the whole network, rather than depending on the capability of each operator's systems. The Public Service Vehicles (Accessible Information) Regulations 2023 now require audible and visible next-stop information on most local bus services. If the underlying data

carries Welsh as well as English names, bilingual announcements can follow across the network.

Risks of adverse effects. The main risk is that Welsh is lost in the data rather than by any decision:

- stop and place data holding only one name, so that downstream systems default to English;
- on-vehicle and at-stop systems that cannot hold or display two languages, or whose character limits squeeze out the second;
- text-to-speech that mispronounces Welsh place names, which undermines both the language and the accessibility purpose of announcements;
- conversion between data formats that drops language-tagged fields; and
- inconsistent spellings of Welsh place names between datasets.

Mitigation. Welsh-language data should be treated as a technical requirement from the start: language-tagged names in stop, timetable and disruption data; standardised place-names, drawing on the Welsh Language Commissioner's list of standardised Welsh place-names; bilingual display and audio requirements in the national technical specification; and checks that Welsh content survives each conversion. The relevant standards already support this: NaPTAN and NeTEx carry alternative-language names, SIRI carries multilingual text, and GTFS supports translations.

12. In your opinion, could the proposals be formulated or changed so as to:

- have positive effects or more positive effects on using the Welsh language and on not treating the Welsh language less favourably than English; or
- mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

Any comments

Yes. We suggest the following changes.

1. **Contract regulations.** Within the data, information and systems theme proposed at Question 1, require bilingual passenger information on vehicles (destination displays and next-stop announcements) and during disruption, generated from the national dataset rather than from each operator's own text.
2. **Section 28 regulations.** Specify Welsh and English stop names, using standardised place-names, as information local authorities must provide, and require them to be maintained in NaPTAN.
3. **Section 27 regulations.** Include operators' bilingual destination and route text where they hold it, so that it can be carried into the network dataset.
4. **National technical specification.** Require language-tagged fields throughout, bilingual display and audio capability in on-vehicle and at-stop equipment, and quality checks on Welsh audio.

5. **Notices and support.** Issue section 27 and 28 notices, templates, guidance and training bilingually, and accept responses in Welsh. Many community councils work primarily in Welsh.
6. **Second tranche.** Require information made available under sections 29 and 30 to be bilingual, with Welsh treated no less favourably than English in open data and journey planners.

13. We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Any comments

About RTIG and this response

RTIG is the UK community organisation for public transport real-time information technology. Our membership spans local transport authorities, bus operators and the supplier community, together with wider stakeholders in passenger information and transport data. It includes authorities and operators in Wales, operators running cross-border services, and suppliers whose systems are used across the Welsh network today.

RTIG is not a trade association acting for a single interest. Our purpose is to improve the quality, interoperability and practical usefulness of public transport data across the sector, and our members sit on every side of the questions this consultation asks. Where the questions are technical, we have given RTIG's considered view, clearly and without hedging. Where members' interests diverge, most obviously on the use and disclosure of commercially sensitive financial and workforce information, we say so rather than presenting a single position.

This response draws on RTIG's work with members, including our response to the Department for Transport's consultation *Bus Services Act 2025: improving information about local services* (RTIG-c130), which addressed closely related questions for England. Where our positions are the same, we have said so; where Wales is different, we have adapted them.

Why data matters more in Wales, not less. In England the traffic commissioner's registration record is the only complete inventory of local bus services. In Wales, once section 38 of the Act is commenced, services secured under local bus service contracts or permits will no longer be registered with the traffic commissioner. The Welsh Ministers, through Transport for Wales (TfW), will become both the specifier of the network and the custodian of the authoritative record of every local bus service. The information powers in sections 27 and 28, and the contract terms made under section 11, are therefore the foundation of every timetable, journey planner and real-time display in Wales. We urge the Welsh Government to design them so that data is collected once, in recognised standards, with identifiers that join the datasets together, and so that it can

support the public information duties in sections 29 and 30 (the second tranche of regulations) without being collected again.

Related issues

1. **The authoritative service record after registration ends.** Journey planners, real-time systems and researchers currently rely on traffic commissioner registration data and, for cross-border services, on BODS. Once section 38 is commenced, the Welsh Ministers' contract and permit records replace registration as the authoritative source for Welsh services. The Welsh Government should set out how that record will be published and kept current, ideally in the second tranche of regulations.
2. **Cross-border services.** Section 38 treats the part of a service outside Wales as a separate service, which will remain registered in England. One bus journey could therefore be described by two records under two regimes. Common identifiers across the border, agreed with DfT and the traffic commissioners, will prevent passengers seeing two partial services where there is one.
3. **Alignment with England.** DfT has consulted on new information requirements under the Bus Services Act 2025, including changes to BODS and its technical specification. Operators, suppliers and journey planners work across both nations. We encourage the Welsh Government and TfW to align formats, profiles and timing with DfT wherever possible, so that suppliers build once.
4. **Sequencing and lead times.** The national technical specification and notice templates should be published well ahead of each regional go-live, starting with South West Wales. Consistent with our England response, we suggest at least 12 months from publication of a frozen specification to mandatory compliance, a test environment available from the start of that period, and a period of parallel running. Changes requiring new on-vehicle equipment will need longer.
5. **Costs and impact assessment.** Data requirements create costs for operators, suppliers and authorities, and those costs fall disproportionately on small operators. We would welcome a published impact assessment for the regulations, and consideration of transition support for small operators and community transport.
6. **The second tranche.** Many of the recommendations in our England response on open publication, licensing, APIs, historic archives and published data quality metrics apply directly to sections 29 and 30. We look forward to responding when those proposals are published.
7. **Working together.** RTIG would welcome the opportunity to work with the Welsh Government and TfW on the technical specification, notice templates and supplier engagement, and to convene authorities, operators and suppliers active in Wales to test proposals as they develop.

Summary of our recommendations

RTIG welcomes this consultation and supports its direction. Under the Act, the Welsh Ministers will specify the network and, once registration ends, hold the authoritative record of every local bus service in Wales. That makes data the foundation of the reformed system, and the first tranche of regulations is the moment to build it in.

Our central recommendations are:

- a **data, information and systems theme** in the contract regulations, set out as a standard form of terms;
- a **national technical specification and set of KPI definitions**, maintained by TfW and referenced by every contract;
- **identifiers that join timetable, vehicle, location and ticketing data**, issued by TfW and required consistently;
- **GB standards and acceptance of existing BODS and WBDS feeds**, so that cross-border operators provide data once; and
- **explicit rules on use and disclosure**, so that the difference between information provided to the Welsh Ministers and information published is settled in regulations.

Responses to consultations may be made public. Your response will be anonymous. However, if you would like your name to be published alongside your response, please insert an x in the box.

I agree to my name being published alongside my response to this consultation.	X
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