

TO: House of Commons Public Bill Committee

CC: Michael Payne, MP

FROM: Lee Odams, Bus Driver

RE: Evidence Submission - Bus Services [No. 2] Bill

DATE: 13th June 2025

1. My name is Lee Odams. I am a resident of Nottingham and have been serving as Bus Driver in Nottingham for 19 Years. I also serve as RMT Branch Secretary for Nottinghamshire & Derbyshire and RMT National Industrial Conference Secretary. I am submitting this evidence in a personal capacity as a UK Bus Driver and Citizen.
2. The Government's Bus Services [No. 2] Bill represents a once-in-a-generation opportunity to fix some of the systemic problems that have compromised the Operational Safety Performance and Working Conditions of Bus Drivers for decades.
3. The Bill's intention to empower Local Transport Authorities (LTAs)—
 - 3.1. to control public Bus Services, and
 - 3.2. to define how these services are delivered—will define the working conditions of all UK Bus Drivers employed to deliver these Bus Services.
4. The Government's Bill was introduced with the following provisions directly associated with safety and Bus Driver Working Conditions—
 - 4.1. "Safety and Accessibility of Stopping Places" (Section 30)
 - 4.2. "Training" (Secs 34-36) that includes training staff about crime, anti-social behaviour and disabilities.
5. As a Bus Driver whose first obligation is to provide a service with the safety and comfort of my passengers in mind, I applaud the Government's decision to put Bus Passenger Safety on the face of the Bill from the legislation's inception.
6. During the Bill's passage through the Lords, overruling the Government's opposition, a few Amendments related to Safety and Bus Driver Working Conditions were added—
 - 6.1. "Provision and design of floating bus stops" (Sec 31)
 - 6.2. "Implementing a Vision Zero programme (Sec 39)
 - 6.3. "Recording and sharing data about assaults" (Sec 40)
7. As a Bus Driver and Professional Driver who also has a duty of care for all Road Users, I applaud these the addition of these amendments and urge MPs that they remain on the face of the Bill.

8. On 11 April 2025, the RMT Union's 82nd Bus Workers' National Industrial Organising Conference unanimously approved 5 [Resolutions](#) sponsored by my Branch calling for Urgent Amendments to the Buses Bill.
 - 8.1. **Resolution 6.** *Amending Bus Services [No. 2] Bill to include Confidential Safety Reporting*
 - 8.2. **Resolution 7.** *Amending Bus Services [No. 2] Bill to include Bus Safety Performance Reporting*
 - 8.3. **Resolution 8.** *Amending the Bus Services [No. 2] Bill to include Safety Revisions for Driving Hours*
 - 8.4. **Resolution 9.** *Amending the Bus Services [No. 2] Bill to include Basic Safety Competence Requirements for Local Authority Officials made responsible for Operating and/or Franchising Bus Services*
 - 8.5. **Resolution 10.** *Amending the Bus Services [No. 2] Bill to include the creation of a National Bus Crash Investigation Branch.*
9. 4 of the 5 Resolutions reflected RMT Union's National Bus Workers support for Amendments 58-61 that Lord Hampton had sponsored which had been recently considered in the Lords—
 - 9.1. [**Amendment 58. Confidential Safety Reporting \(Withdrawn\)**](#) — *that any Bus Operator running a Public Bus Service enabled by the Bill be subscribed to a Confidential Safety Reporting Scheme like [CIRAS](#) or its equivalents.*
 - 9.2. [**Amendment 59. Bus Safety Incident Reporting \(Not Moved\)**](#)— *that any Public Transport Authority ("PTA"/"LTA") taking control of its Public Bus Services through franchising or direct ownership will be obligated to publish data about the Safety Performance of those Bus Services every quarter.*
 - 9.3. [**Amendment 60. Bus Driver Hours \(Not Moved\)**](#)— *that the Working Hours of Bus Drivers should conform to those of UK Lorry Drivers.*
 - 9.4. [**Amendment 61. Safety Qualifications of Public Transport Authority Officials \(Not Moved\)**](#) —*that any Public Transport Authority Official made responsible for Franchising Public Bus Services under the Act will possess basic IOSH and/or NEBOSH certifications.*
10. At the Government's recommendation, these 4 Amendments were either *withdrawn* (58) or *not moved* (59-61) in the Lords, but that procedural fact does not negate the sound evidence and urgent requirement that these 4 Amendments must be included in the Bill if the legislation is to reflect nearly a decade of "lessons learned" from Transport for London, a Public Transport Authority/Local Transport Authority ("LTA") that franchises about 25% of the UK Bus Fleet that provides about 50% of the country's Bus Journeys.
11. **Confidential Safety Reporting (Amendment 58, Withdrawn)** - *that any Bus Operator running a Public Bus Service enabled by the Bill be subscribed to a Confidential Safety Reporting Scheme like [CIRAS](#) or its equivalents.*

- 11.1. In Air Transport (aviation) and Railways, workers' access to an independent and confidential safety incident reporting service is a regulatory requirement. Specifically, in the aviation sector, the European Aviation Safety Agency (EASA) mandates the use of the Confidential Safety Reporting (CSR) system. In the railway industry, the Rail Safety and Standards Board (RSSB) provides guidance and standards for confidential reporting, and rail companies are required to comply with these standards.
- 11.2. While Lord Hendy was TfL Commissioner, TfL [opposed](#) extending Bus Drivers' access to Confidential Safety Reporting but was overruled by Mayor Boris Johnson in [January 2015](#).
- 11.3. Despite Mayor Boris Johnson's approval, it took over a year before TfL [formally announced](#) that it would be extending Confidential Safety Reporting to its Franchised Bus Operators' Drivers in January 2016.
- 11.4. Accordingly, funded by entirely TfL (and not by the Transport Sector Operators themselves, which is the case in Rail and Air), the Rail Industry's Confidential Safety Incident Reporting and Analysis System ([CIRAS](#)) has been made available to TfL Bus Drivers since January 2016. In fact, CIRAS's Director has sat on TfL's [Board of Directors](#) and its Board [Safety Panel](#) since 2019.
- 11.5. During the [13 February debate](#) in the Lords, I believe that Lord Hendy was perhaps mistaken when, while appearing to be make a concession while rejecting [Amendment 58](#) on behalf of the Government, the Minister offered to make the DVSA Intelligence Unit's details more accessible. Some quick research will reveal Lord Hendy conflated the role of the [DVSA Intelligence Unit](#)—*which only serves as a means for the government to investigate and prosecute private citizen reports of illegal or dangerous driving*—and that of Confidential Safety Reporting—which is founded on the principle that subscribers to such an independent service would want to receive any and all reports about unsafe practices involving their operations, including those from workers who feel that they cannot report them for whatever reason. In the Bus Industry, it's no secret that Bus Workers often face being disciplined, harassed or fired because of reporting their safety concerns to their Bus Operator employer. In fact, I believe the defective safety culture of the UK Bus Industry was perfectly evidenced in 2016, when TfL—and not its franchised For-Profit Bus Operators—was compelled to fund its Bus Contractors' London employees' gaining access to CIRAS. The DVSA Intelligence Unit is manifestly not a *bona fide* Confidential Reporting System and the Minister's apparent 'concession' must not be seen as such.
- 11.6. TfL—the UK's largest and longest running Bus Franchiser—has funded Confidential Safety Reporting being made available to contracted Bus Drivers since 2016.
- 11.7. A recent [RMT Survey](#) reported that 80% of its Bus Workers surveyed wanted access to a Confidential Safety Reporting System.

- 11.8. As I evidenced earlier, RMT Union's 2025 Bus Workers National Industrial Organising Conference *unanimously approved* a [Resolution](#) (No. 6) calling for amending Bus Services [No. 2] Bill to include Confidential Safety Reporting.
- 11.9. The proposed language of Amendment 58 was essentially the same put forward by Lilian Greenwood MP (co-sponsored by Daniel Zeichner MP and Nic Dakin MP) on 16 March 2017 and by Ian Mearns MP on 17 March 2017 in the Buses Bill.
- 11.10. Amendment 58 was a Labour Amendment proposed for the Conservative Government's Buses Bill and, given Confidential Safety Reporting's success in London and support by RMT Union Bus Workers nationwide, I can see no logical reason why a Bus Driver's right to Confidential Safety Reporting should not sit on the front of this Labour Government's Buses Bill.
- 12. Bus Safety Incident Reporting (Amendment 59, *Not Moved*) - *that any Public Transport Authority ("PTA"/"LTA") taking control of its Public Bus Services through franchising or direct ownership will be obligated to publish data about the Safety Performance of those Bus Services every quarter.***
 - 12.1. Since 2014, Transport for London has published the Bus Safety Performance Data of its franchised Bus Operation every Quarter (<https://tfl.gov.uk/corporate/publications-and-reports/bus-safety-data>)
 - 12.2. Up until that time, it is my understanding that TfL (at the time, Lord Hendy was TfL Commissioner), [obstructed](#) efforts to compel TfL to be transparent about publishing this critical operational safety performance information for public scrutiny and TfL only acted to publish this data after being [compelled](#) by Mayor Boris Johnson in January 2014.
 - 12.3. Since TfL has published its Bus Safety Performance Data for public scrutiny, Bus Drivers and the public have been made aware of the reality of TfL Surface Transport's poor safety culture and frequent safety performance failings through a number of London Assembly Transport Committee [Publications](#), news [reports](#), and publicly-available blog [posts](#). In short, TfL—the LTA for the UK's largest city—was forced against its will to collect and publish its franchised Bus Operators' safety performance data, but this imposed policy has been manifestly in the public interest.
 - 12.4. Moreover, the public availability of this data has been invaluable to London Bus Workers because it's provided them with (a) [concrete verifiable data](#) about the safety performance about the specific Bus Operators for whom they work and, more importantly, (b) the performance metrics of a franchised Bus Operation they are [currently and actively campaigning against](#) because their lived experience proves it's ["institutionally unsafe."](#)
 - 12.5. In 2019, inspired by the transparency and granularity of TfL's Quarterly Bus Safety Performance Data Publications, I filed [an FOI Request with every Local Public Authority](#) in the United Kingdom and asked them to provide me

with the exact same Bus Safety Performance dataset that TfL publishes for all Bus Operations within area where the council serves as the Highway Authority. The results of my exercise were shocking: there was not a single Local Authority in the United Kingdom that published any Bus Safety Performance Data and 90 percent of the local authorities did not even collect such data. For the tiny minority of Local Authorities that had any data on file, none of it was granular enough to permit any scrutineer the ability to identify the actual operator involved or any bus safety incident. In short: outside of London, Bus Safety Data Performance Data is a shambles.

12.6. In response to the question raised by Lord Hampton about the publishing Bus Safety Data on [8 January 2025](#), Lord Hendy sent a letter to the Lords on 17 January 2025 which made a number of claims about the "robustness and transparency" of the bus safety performance data collected and published by the DfT ("STATS19") and DVSA which publicly-available evidence reveals to be, frankly, misleading, because, inter alia—

12.6.1. Even a casual review of STATS19 Data will reveals that is neither published as frequently or in as much useful granular detail as the Bus Safety Data TfL has published on its website every quarter since 2014.

12.6.2. STATS19 data combines incidents involving Bus and Coaches and does not include injury incidents involving Buses that have taken place on private roads or land (entrances/exits to and at bus stations). As far as Bus Casualty Data Reporting is concerned, STATS19 is far from "robust": in fact, the dataset is both inaccurate and misleading.

12.6.3. STATS19 also does not include injury incidents (Trips & Falls) onboard buses that might not have been caused by a collision yet produce a lot of casualties (including fatalities) and are an important indicator of Bus Safety Performance.

12.6.4. An analysis of TfL's published reveals that, for year period 1 June 2016 -31 December 2023, Collisions from London Buses at Bus Stations have injured 133 and sent 87 to hospital. In addition, since 1 January 2014-31 January 2024, 6 people have been killed from Collisions from London Buses at Bus Stations. None of these fatal or injury incidents involving Buses are recorded in STATS19 Data.

12.6.5. Out of the 120 Preventable Bus Safety Deaths that have occurred over the period Q1 2014-Q2 2024 that TfL's published, 27 (23%) don't get reported in STATS19 because they occurred at Bus Stations (6) or resulted from onboard falls (15) or "other" preventable safety incidents (6) that TfL about which doesn't provide any details.

- 12.7. If it wishes, I will be happy to provide this Committee with a separate briefing note about the manifest failings of the STATS19 Dataset as far as Bus Safety Performance Reporting is concerned.
- 12.8. I believe that the Lords attending the [debate on 8 January 2025](#) about Amendment 59—based on his excellent testimony, Lord Hampton clearly excluded—were unfamiliar with the important distinction between the granularity and frequency of TfL's Bus Safety Data and the poor quality and frequency of the DfT's annual STATS19 dataset, so they accepted Lord Hendy's pledge on [13 February 2025](#) to "go away and have a close look at" STATS19 as a "concession" and simply moved on.
- 12.9. Even based on the DfT's published STATS19 data, Buses and Coaches kill pedestrians at a substantially higher rate than either their numbers or presence (mileage run) on UK roads would predict—
- 12.10. For the period 2019-2023—the last period for which DfT has published data—
 - 12.10.1. Buses and Coaches killed, on average, about 20 pedestrians per year.
 - 12.10.2. Buses & Coaches account for 3.4% of Total Pedestrian Fatalities in the United Kingdom but only account for 0.34% of the total number of vehicles in the UK and only 0.57% of the total vehicle miles in the UK.
 - 12.10.3. Accordingly, based on analysis of DfT's published data—Bus & Coach Lethality is *10 times higher* than what their numbers on the road would predict and more than 5 times higher when "corrected" for miles run.
 - 12.10.4. Remember— if DfT is using STATS19 Data—those lethality rates don't include incidents of pedestrians killed at Bus Stations or on non-public roads or Passengers killed in preventable onboard safety incidents.
 - 12.10.5. Analysis of TfL's more robust dataset reveals that, since 2014, its Buses have been involved in about 1 in 10 pedestrian fatalities in London. For a franchised public service fleet that constitutes about 1% of the traffic on London's roads at any time, TfL's Bus Fleet's Lethality Rate being 10 times higher is eerily similar to that of UK Buses and Coaches, with the important distinction being that London's data only includes Buses, all of which are franchised by the LTA whose Chairs is the Mayor of London.
 - 12.10.6. In fact, based upon TfL's [preliminary 2024 road casualty data](#), TfL's franchised Bus Fleet were involved in 1 in 7 pedestrian deaths in London.
- 12.11. This Bill will create National Standards and Reporting Requirements for Local Authorities to collect and share data about, *inter alia*, assaults on Buses (Sec. 40) and the safety of Bus Users at Bus Stops (Sec. 30).

- 12.12. National Standards already exist by which UK Bus Operators must supply the Government data on bus timetables, vehicle locations and fares for every local bus service in England through the [Bus Open Data Service](#) that was mandated by [Bus Services Act 2017](#).
- 12.13. Meanwhile, this Government has refused all attempts to have its Buses Bill hold any provisions that would compel any agency—national or local authority—to Collect and Publish *granular* and *timely* Data about the frequent preventable safety incidents involving Buses. We UK Bus Drivers know that injuries caused by Crashes and Onboard Falls *can be* leading indicators of systemic problems: e.g., Bus Driver Fatigue caused by (a) dangerous rotas and negligent employee oversight (b) Contracted Timeliness Targets and (c) Lack of Welfare Facilities come immediately to mind. Bus Drivers. [Public Scrutineers](#) and the London Assembly long familiar with the United Kingdom's largest and longest-running Franchised Bus Operation have [identified](#) a host of systemic problems as [causal factors](#) in Bus Safety Incidents where people are killed and injured.
- 12.14. Despite the Minister's spoken and written statements during the Lords' debates, we have plenty of public evidence that reveals that neither the [DfT](#), nor [DVSA](#) nor the [Transport Commissioners](#) collect nor publish Bus Safety Performance Data with the same regularity (Quarterly) or level of granularity as TfL has been compelled to do since 2014.
- 12.15. Bus Workers and the UK Public surely deserve to be provided with the same quality of published data about the safety performance of Bus Services that will be operated or franchised by Local Authorities that Londoners have been provided by TfL since 2014.
- 12.16. Since the proposed language of Amendment 59 is essentially the same put forward by Lilian Greenwood MP (co-sponsored by Daniel Zeichner MP and Nic Dakin MP) on 16 March 2017 and by Ian Mearns MP on 17 March 2017 in the Conservative Government's Buses Bill, this Amendment already has a strong Labour Party pedigree, a fact underscored by the unanimous approval of this Amendment in a resolution at RMT Union's 2025 National Industrial Organising Conference.
- 12.17. Lastly—although in the [13 February Lords Debate](#)—Lord Hendy named Manchester (in addition to London) as a LTA that published its Bus Safety Performance Data online, I recommend that you request the Minister to verify his public statement by providing the Committee with some evidence. I wrote a [public letter to Andy Burnham](#) on 23 October 2023 to press him act on specific issue and I received a response from TfGM (ref. 806113) on 5 December which confirmed TfGM's intention to collect and publish this data but "it would likely be 12 months before it is introduced". If you check TfGM's website, there is plenty of information about [Bus Punctuality](#), but I can't find anything about [Bus Safety Performance](#) in Manchester. I sincerely

hope Lord Hendy is correct here, but until I see Bus Safety Performance Data published on TfGM's website, I'm doubtful.

- 12.18. UK Bus Workers and the Public deserve to know how safe the Bus Operators within their Local LTA are being operated or franchised by Local Authorities. Like TfL since 2014, LTAs should be compelled to collect and publish granular and timely data about Bus Safety Performance within their boundaries.

13. Bus Driver Hours (Amendment 60, *Not Moved*)- *that the Working Hours of Bus Drivers should conform to those of UK Lorry Drivers.*

- 13.1. 1 in 5 of the London Bus Drivers [surveyed by Loughborough University](#) (2017) indicated that they had to fight sleepiness at least 2-3 times a week, and about 1 in 4 had a 'close call' due to fatigue in the past 12 months
- 13.2. Recommendation 3 of [UCL's Phase 2 Report](#) on London Bus Driver Deaths instructed TfL (cf. page 70) —"Fatigue is a pre-existing issue for some bus drivers, with some evidence that COVID-19 infection and lockdown has contributed to this. Action, already being taken following previous research into factors contributing to tiredness, should be enhanced to address any new issues arising from the pandemic, following a short-term review of shift lengths, patterns and rotas."
- 13.3. Although TfL [committed](#) to act on UCL's Recommendation over the "summer of 2021", as of 2025 [TfL has not yet performed](#) this "short term review".
- 13.4. In 2018, Matt Western MP launched campaign called "[Rowan's Law](#)" that called on the Government to support his "[ten minute bill](#)" to 'cap driving hours for local bus drivers at 56 hours a week, and no more than 90 hours over two consecutive weeks, as is already the case for long-distance bus and HGV drivers.'
- 13.5. In the [13 February Debate](#) in the Lords, Lord Hendy rejected Amendment 60, because, it would seem, that the existing rules about local bus drivers driving hours are "long-established" and not because the Government had any human factors reports or analysis that contradicted what Loughborough University, UCL and three London Assembly Transport Committee Investigations (the last being published in [March 2024](#)) confirmed with UK's largest and longest-running Franchised Bus Operation: Bus Driver Fatigue is endemic, long-standing, danger-causing and not addressed by the LTA responsible for contracting Bus Services, whose longest-serving Commissioner to date has been Lord Hendy.
- 13.6. Given the sheer amount of public data available from London that clearly evidences the relationship between driver fatigue, long working hours and unsafe rotas, it cannot make sense that, under current driving rules, UK Bus Drivers can work up to 130 hours over two-week period, while lorry drivers are restricted by law to 90.

- 13.7. From reading the debates in the Lords, it appears Amendment 60 was not moved for a number of reasons, inter alia, (a) the Government opposed it (b) the Opposition spoke against it and, it would appear (c) the Amendment's Sponsor changing his mind as to whether the Amendment should be about 'capping Bus Driver Working Hours' or 'giving Bus Drivers a safe way to report their concerns about being overworked'. In any case, both substantive safety issues will be addressed in the Buses Bill if Amendment 58 and Amendment 60 are included in the Buses Bill.
14. **Requiring LTA Officials involved in Managing or Franchising Bus Services to possess bona fide Safety Accreditation. (Amendment 61, *Not Moved*)-** that any Public Transport Authority Official made responsible for Franchising Public Bus Services under the Act will possess basic IOSH and/or NEBOSH certifications.
- 14.1. Buses Services [No. 2] Bill will empower Local Authorities to own, operate or franchise Local Bus Services. We already know from TfL that London's Public Transport Authority has consistently placed vast powers to determine the performance of London Bus Operators in the hands of executives [with little or no](#) Professional Safety Qualifications. This includes TfL's Chief Safety Officer, who was appointed in the role in September 2019 with [no professional safety qualifications](#).
- 14.2. In addition to designing, negotiating and enforcing Bus Contract Performance provisions that will have a direct impact on Bus Driver Working Conditions and Safety Performance (cf. Lord Moylan's comments—"the structure of the contract on which those franchises will be based needs to be looked at carefully in the light of safety considerations"—during the [13 February Lords Debate](#)), LTAs often have a number of obligations that also affect Bus Driver Welfare that might not immediately appear related to safety, but are obviously do impact it. A good example of this is Toilet Provision for Bus Drivers. In London, the Mayor [admitted](#) in February 2022 that 1 in 4 London Bus Routes (175 of 675) lack Toilet Provision for Bus Drivers at one end and, furthermore, that TfL, its Bus Contractors and Unite the Union had agreed that Bus Drivers can be [denied a toilet for up to 150 minutes](#) without any Human Factors Assessment or Legal Assessment ever having being conducted to determine whether or not this conscious decision to degrade Bus Driver working conditions was safe or even humane. When Nottingham City Council decided to charge Bus Drivers an admission fee to use the only toilet available to them at a rest stop, I led a [successful campaign](#) to stop this penalty being levied upon them. I can write with confidence that I suspect the LTA Executive who issued that order likely lacked any safety qualifications. Seeing that [Toilet Dignity for Bus Drivers](#) has been raised as an issue of concern by the [RMT](#) and [GMB](#) union at recent national congresses, it concerns me that the Government believes LTA Executives who have no safety qualifications should be permitted to be

design, negotiate and enforcing performance-based Bus contracts with no safety qualifications.

- 14.3. During the [28 January Lords Debate](#), Lord Hendy rejected Amendment 61 giving the reason that the "effect of this amendment would be an increase in the cost and time it takes to franchise, if staff had to undertake this specific training before starting the franchising process." I find Lord Hendy's logic *puzzling*. Given that unions like RMT train hundreds of their own members to be NEBOSH- and IOSH- Certified in the course of a year, I know that the UK's unions have "economies of scale" and could deliver this training in a timely manner to LTA officials for a fraction of whatever *unevidenced* costs (in terms of time and money) Lord Hendy is contemplating. Is it too much to ask that the LTA officials who will be made accountable for operating or franchising Public Bus Services in their area be trained up to possess the kind of basic safety accreditations that unions, for decades, have managed to ensure their members obtain?
- 14.4. On 11 April 2025, RMT Union's 2025 Bus Workers National Industrial Organising Conference unanimously approved a [Resolution](#) (No. 9) calling for amending BusServices [No. 2] Bill to include Basic Safety Competence Requirements for Local Authority Officials made responsible for Operating and/or Franchising Bus Services.
- 14.5. So that some "common sense" might be evident in the front of this Bill, I urgently recommend this Amendment: the "doom loop" of London's worsening [bus safety performance since 2009](#) provides enough evidence of what happens when LTA executives who don't possess recognised safety credentials are given a free hand to contract these services.
15. **Amendment 5. Creation of a National Bus Accident Investigation Branch**
16. There is currently no independent national agency that's responsible for investigating Public Bus Crashes and that makes the UK Bus Sector's lack of independent safety oversight 'worst in classes for any Public Transport Mode. Rail has the [Rail Accident Investigation Branch](#). Air has the [Air Accidents Investigation Branch](#). Shipping has the [Marine Accident Investigation Branch](#). Even [Automatic Vehicles](#) have an Independent Crash Investigator. But Bus crashes are investigated by the bus operators themselves, unless someone is killed, in which case the Police and Coroners step in, but their interest is only in establishing liability. There is no systematic learning from bus crashes, aimed at improving bus safety year-by-year.
- 16.1. RMT Union's 2025 Bus Workers National Industrial Organising Conference unanimously approved a [Resolution](#) (No. 10) calling for amending BusServices [No. 2] Bill to include the creation of a National Bus Crash Investigation Branch.
- 16.2. A recent [RMT Survey](#) reported that 90% of its Bus Workers surveyed support the creation of an 'independent bus accident investigation branch, similar to that which exists in rail'.

- 16.3. Under the [Automated Vehicles Act 2024](#), the Secretary of State was mandated to appoint inspectors to investigate autonomous vehicle incidents. These vehicles, and hence incidents involving them, don't even exist yet. But bus crashes do exist and, as we have seen, they already take a terrible toll in terms of killed and seriously injured.
17. UK Bus Workers recognise that the "Rights" that London's Bus Workers are being denied and are now [campaigning](#) for the Mayor of London to incorporate into Transport for London's Framework Bus Contract—i.e.,
- 17.1. The Right to a safe work schedule without any forced overtime or loss of pay
 - 17.2. The Right to a decent and proper rest break in the working day
 - 17.3. The Right to drive a safe and well-maintained vehicle
 - 17.4. The Right to clean, serviced toilet and rest facilities on all bus routes
 - 17.5. The Right to report safety concerns without fear of retribution from TfL or employers
 - 17.6. The Right, when seriously ill and covered by a doctor's note, to not be harassed into coming into work until fit to do so
 - 17.7. The Right to relevant and timely safety training
 - 17.8. The Right to drive without being forced to answer radio messages and texts from Controllers whilst in motion
 - 17.9. The Right to have all company rules in writing and clearly displayed
 - 17.10. The Right to be treated with dignity and respect by our employers, TfL and the public
 - 17.11. The Right to Working Air Cooling in our cabs in the summer heat
 - 17.12. The Right to Working Heaters in our cabs in the cold of winter
- are commonly denied to Bus Workers across the UK Bus sector.
18. TfL Bus Drivers are campaigning for these rights to be embedded in TfL's Framework Bus Services Contract in order to "restore the time that lethal Bus Contract Incentives take away from London's Professional Bus Drivers to perform their jobs safely and with duty of care."
19. A National Independent Bus Crash Investigator would be in much better position to determine if issues like 'lethal Bus Contract Incentives', 'unsafe work schedules' and a 'culture of fear' identified by TfL Bus Drivers might represent common system-based causal factors in some of the Fatal Bus Crashes we've seen across the United Kingdom in the past few years, i.e.,
- 19.1. [10 October 2015 Bus Crash Death](#) in Coventry of Rowan Fitzgerald (age 7). Based on the BBC Report "the bus company, which is part of Stagecoach group, admitted allowing Mr Chander to work more than 70-hours a week" and "It also admitted allowing him to continue working despite warnings about his driving." The driver in this incident was

- convicted but spared jail time by the judge, apparently because of his advanced age and declining health status.
- 19.2. [11 September 2021 Bus Crash Death](#) in London of an 83-year-old pedestrian. The [press coverage of the trial](#) of the 76-year-old of a Route 291 Bus operated by Go Ahead London under franchise to TfL reported 'Traffic collision experts concluded that the Bus Driver began turning while his view was obscured by another bus *and* "a pillar inside the bus also created a blind spot but the driver could have moved his head and upper body to look around it". Further [scrutiny by the London Assembly](#) has revealed that about 1 in 3 Buses serving TfL's fleet are the same make and model of the bus with this lethal blind spot. The driver in this incident was spared jail time by the judge, apparently because of his age and previously good driving record.
- 19.3. [30 December 2022 Bus Crash Death](#) in Bolton of an 11-year-old boy who press reports indicated fell off his bicycle in front of a Bus whose Driver was attempting to overtake him after sounding the horn. The Coroner's Report indicated the Bus Driver was driving within the Highway Code but failed to mention why the Driver felt compelled to overtake.
- 19.4. [22 October 2024 Bus Crash Death](#) in Nottingham of 34-year-old woman who press reports state "a collision investigator said it was likely the 34-year-old had been caught by the tyre next to the door as the bus turned left at a junction, causing her to fall." Press reports also stated that a "coroner found the collision was "unavoidable" because it was dark and the driver would not have seen" the woman. The press is silent about whom the Bus Driver and investigator was working for.
20. The four incidents I identified above hint at potential causal factors—e.g. Bus Driver Fatigue, unsafe or poorly-designed vehicles, time pressure—that might lie in the "Rights" that TfL Bus Drivers and UK Bus Drivers know they're being denied by their employers, but because these frequent fatal incidents involving Buses are never investigated by an independent National Bus Crash Investigator, all these deaths and serious injury incidents are seen as "one-offs" instead of as being the inevitable outcome of UK Bus Operations that share common "institutionally unsafe" features that make fatal human error inevitable.
21. **Creating a Resilient National Bus Safety Culture:** The idea that "human error is not the cause, it's the consequence of poor safety culture" would imply a shift in perspective within safety management of the UK Bus Industry that (a) [does not exist today](#) and (b) [cannot exist](#) without the reforms these 5 Amendments will begin to catalyse. Instead of blaming individuals for errors, the Government and Bus Industry know from Independent Investigations carried out by National Investigators in the Rail, Air and Maritime Sectors that fatal errors are often the result of systemic failures, including inadequate safety procedures, inadequate (or no!) training, poor communication, poor (or no) data collection/analysis or an industrial culture that tolerates shortcuts or risks to meet contract targets.

22. A strong safety culture that Amendments 1-5 will begin to create across the United Kingdom's Bus Industry will—

- 22.1. prioritise safety over convenience or speed
- 22.2. foster a learning environment where errors are analysed and used to improve systems
- 22.3. empower individuals to speak up about safety concerns without fear of reprisal
- 22.4. permit better public scrutiny of Bus Safety Performance

23. I implore the Committee to add these 5 Amendments to the Government's Bus Services [No. 2]: they represent the best opportunity for this Bill to *begin* to create a **Safety Culture** that does not presently exist anywhere in the United Kingdom.