

TO: Public Bill Committee, House of Commons

CC: Tulip Siddiq, Member of Parliament for Hampstead and Highgate, Siân Berry MP, James Naish, MP

FROM: Tom Kearney, Bus Crash Survivor and Campaigner, [#LondonBusWatch](#)

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

DATE: 3 July 2025

A. Background

1. I have been a resident of the United Kingdom since 1997 and I have lived in London where I have [worked](#) as both an executive and non-executive director for international companies in the mining and heavy industrial sectors in Europe, Asia and Africa.
2. My interest in the Operational Safety Performance of Transport for London's (TfL) contracted Surface Transport Operation relates directly to [surviving critical injuries](#) I suffered after being hit by a TfL Bus on [Oxford Street](#), 18 December 2009.
3. Working together closely with a few London Assembly Members since 2010, we successfully convinced the Mayor of London (Boris Johnson) to compel TfL—
 - a. [since January 2014](#), publish London's [Bus Safety Performance Data](#) every quarter on its Website. As far as I know, TfL is the only Local Transport Authority (LTA) in the world to do this.
 - b. [since January 2016](#), fund Confidential Safety Reporting (in this case, [CIRAS](#)) to the Drivers of TfL's contracted Bus Operators. As far as I know, TfL is the only LTA in the United Kingdom that offers the employees of its paid bus contractors this service, the provision of which is a legal requirement in the Rail, Air and Maritime Sectors.
4. I have given oral evidence for the London Assembly Transport Committee's three Investigations of Bus Safety in London:
 - a. [7 November 2023](#) (Transcript)
 - b. [15 May 2019](#) (Transcript)
 - c. [28 February 2017](#) (Transcript)
5. I have provided written evidence for at least four London Assembly Investigations—
 - a. [April 2024](#) - published as *Appendix 1* in Bus and Tube Safety - Transport Committee Investigation
 - b. [March 2024](#)-PISIC 14 (pp. 24-39) Individual Evidence Contributions to - Police & Crime Committee Investigation of Serious Injury Collisions
 - c. [30 January 2017](#) - Bus Safety in London ("Driven to Distraction") - Transport Committee Investigation
 - d. [24 July 2013](#) - Bus Services in London (pp. 225-260, Public Evidence Submissions) - Transport Committee Investigation

6. In 2016, I [drafted 2 Amendments](#) for the Bus Services Bill about (a) Confidential Safety Reporting for Bus Drivers and (b) Bus Safety Performance Data Reporting that were tabled by [Baroness Jones of Moulsecoomb](#) and, although failing to receive the Conservative Government's support to be included in the legislation, they were incorporated into the [Bus Services Act \(2017\) Guidance](#) (cf. Sections 4.31-4.33 "Improving the safety of bus services").

B. Introduction

7. The Government's Bus Services [No. 2] Bill provides an important opportunity for the UK Bus Industry to adopt key safety policies present for decades in the Rail, Air and Maritime industries. In its current form—and considering the Government's proposed amendments and stated goals—the Bill today contains no substantive safety policies. Based on the conclusions I've reached from my volunteer [15-year research](#) of the safety performance and safety culture of Transport for London—the LTA which runs the country's largest and longest-running franchised Bus Operation—without the addition of any substantive amendments addressing Bus Safety and Bus Driver Working Conditions, I believe the current legislation ignores both (a) well-established best safety practice long present in other Transport Systems and (b) the well-evidenced safety concerns of the London Assembly, UK Bus Drivers and the survivors and families of the victims of all-too-frequent fatal and life-changing Public Bus Collisions.

C. Endorsement of Siân Berry's Amendments NC5-NC8

8. Accordingly, I support Siân Berry's [Amendments NC5-NC8](#) and, firstly, would like to add my comments to these Amendments for the Committee's consideration.

D. Comments on Amendment NC5 - "Confidential Safety Reporting for UK Bus Workers"

General Comments on Amendment NC5

9. Transport for London (TfL) extended Confidential Safety Incident Reporting to London Bus Drivers [in January 2016](#). TfL accounts for 25% of all UK Buses and 50% of the UK's Bus Journeys.
10. This Amendment echoes that first proposed in 2016 in the Lords for the Bus Services Bill by [Baroness Jones of Moulsecoomb](#) and in the Commons by Lilian Greenwood MP ([16 March 2017](#)) and Ian Mearns MP ([27 March 2017](#)). Greenwood's Amendment was co-sponsored by Daniel Zeichner MP and Nic Dakin MP.
11. A recent [RMT Survey](#) reported that 80% of its Bus Workers surveyed wanted access to a Confidential Safety Reporting System.

12. 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.

Specific Comments on Amendment NC5

13. When an Amendment nearly identical to this NC5 was introduced by Lord Hampton in the Lords (as [Amendment 58](#)), the Government opposed it, arguing, while it recognised a Bus Driver's right to report his or her safety concerns to a Confidential Reporting System was "important", "a number of official routes exist to allow anyone to provide confidential, anonymous reporting on safety and standards in the bus sector - potentially backed up by enforcement". The Government then offered the "DVSA intelligence unit" as an equivalent service and, although on [13 February 2025](#) Lord Hendy admitted the service was "difficult to find", on [26 March 2025](#), the Minister undertook to make the DVSA's reporting service 'more accessible' to Bus Drivers.
14. If the Government's Transport Ministers *already know* that—
- Transport Workers having access to Confidential Safety Reporting *is the law* in the Rail, Air and Maritime Industries.
 - after [opposition from TfL](#) (then led by Lord Hendy), Mayor Boris Johnson compelled TfL to make CIRAS available London Bus Drivers in [January 2015](#), a promise that was kept in [January 2016](#), over [half a year](#) after Lord Hendy had left TfL;
 - the DVSA Intelligence Unit's [statutory role and function](#) is *substantially different* than that of a Confidential Safety Reporting Service like [CIRAS](#).

I believe that Ministers' offering of the DVSA intelligence unit as an alternative to having Confidential Safety Reporting in the Bill requires further examination by this Committee. It is important to review the Government's statements regarding this Amendment for accuracy.

15. To be fair, Ministers did comment "CIRAS is a third-party service, and it would not be appropriate to include them within scope of this Bill, my colleague, Lord Hendy of Richmond Hill, encouraged employees of member organisations to consider using this [DVSA intelligence unit] service where appropriate in the House of Lords".
16. To address the Government's—in my view—*valid* observation about the incorrectness of specifying the use of a particular third-party service in a Bill, Amendment NC5 *should be reworded* to match [Resolution 6](#) ("Amending Bus Services [No. 2] Bill to include Confidential Safety Reporting") passed *unanimously* by the RMT Union's 82nd Bus Workers National Industrial Organising Conference on 11 April 2025, i.e.,

"An operator of a local bus service may not participate in any scheme under the Act, and an authority or authorities may not franchise an operator,

unless the operator has given a written undertaking to the applicable authority or authorities that—

(a) it has subscribed to a confidential safety reporting system that—

1. (i) is suitable for bus operations staff
2. (ii) can demonstrate it is adequately

experienced, resourced and
staffed; and

(iii) is entirely independent of any bus operator's control.

(b) it has used its best endeavours to ensure that all staff of the operator have been made aware of their right to use this confidential safety reporting system to enable bus operators' staff to report incidents, unsafe acts, concerns and safety-related issues that they do not feel able to report through normal channels, or where normal reporting channels have not resolved the issue;"

17. Keen observers of Parliamentary history will note that this precise wording not only addresses the Government's legitimate concerns about citing a specific third-party service, it neatly echoes Amendment NC5 submitted on [16 March 2017](#) by Lilian Greenwood, Daniel Zeichner, and Nic Dakin to the Bus Services Bill, but *withdrawn after debate* being opposed by the (then) Conservative Government.

18. Frankly, I'm surprised to see a Labour Amendment being opposed by a Labour Government and I would ask the Committee to consider rewording Siân Berry's Amendment NC5 like RMT and I have suggested, and which Labour MPs had earlier correctly formulated in March 2017.

E. Comments on Amendment NC6 - "Compelling LTAs to Publish Bus Safety Performance Data for Public Scrutiny every Quarter"

General Comments on Amendment NC6

19. TfL has been publishing its Bus Safety Performance Data [since 2014](#).

20. Like Amendment NC5, Amendment NC6 echoes that first proposed in 2016 in the Lords for the Bus Services Bill by [Baroness Jones of Moulsecoomb](#) and in the Commons by Lilian Greenwood MP (16 March 2017) and Ian Mearns MP (27 March 2017).

21. RMT Union's 2025 Bus Workers National Industrial Organising Conference unanimously approved a [Resolution](#) (No 7) calling for amending Bus Services [No. 2] Bill to include Bus Safety Performance Reporting.

Specific Comments on Amendment NC6

22. When a *nearly identical* Amendment was submitted by Lord Hampton in the Lords ([Amendment 59](#)), the Government opposed it citing a number of reasons, including those given by Lord Hendy orally in his [8 January 2025](#) responses in the Lords and via in his [17 January 2025 Letter](#) to them which implied, effectively, that making LTA's responsible for collecting and publishing Bus Safety Performance Data every Quarter would, I can only surmise, *duplicate* the Government's collection and publication of STATS19 data, which Lord Hendy has asserted was "a comprehensive and robust public record of personal injury incidents and includes a wide range of data that can be used to support future improvements to safety".

23. In his 28 February 2025 Letter (Annex 1), Minister Simon Lightwood added—

"Though these [STATS19] datasets already provide a comprehensive picture of bus safety incidents on the public highway, we are investigating avenues to ensure address gaps elsewhere, as Lord Hendy committed to in Parliament.

24. Assuming that Ministers are already aware that —

- While Lord Hendy was TfL Commissioner, that LTA *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 to do so* by Mayor Boris Johnson in [January 2014](#).
- TfL has recently published [detailed guidance](#) about its Bus Safety Performance Data Reporting that highlights the manifest *weaknesses* of both its own and the Government's STATS19 Datasets regarding, specifically, how both fail to record some Bus Safety-related fatalities.

25. In my view, the Government's opposition to Amendment NC6 defies any reasonable political explanation. If STATS19 Data are a "comprehensive and robust public record" of Bus Fatalities, how, for example, can Ministers explain why the Bus Collision Deaths—

- of pedestrian [Melissa Burr](#), who was killed 10 August 2021 by a Route 507 Go-Ahead bus working under contract to TfL, and
- of pedestrian [Grace Macalely](#), who was killed 15 December 2023 by a Route 212 Go Ahead London bus working under contract to TfL

— which constitute only *two of many* fatal Bus incidents that are *not recorded* in STATS19's "comprehensive picture of bus safety incidents".

26. I attach, as Annex 2, a one-page briefing note revealing some of the manifest deficiencies of STATS19 Data that I prepared in 28 January 2025 for Lord Hampton, from which he quoted in the [13 February 2025](#) Lords Debate. For ease of reference, here are few of key messages found that note:

- Even a casual review of STATS19 Data will reveal that it 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.
- Because 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 both inaccurate and misleading*. 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) which are also an important indicator of Bus Safety Performance.
- 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 people of which 87 were sent 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.*
- Out of the 120 Preventable Bus Safety Deaths that have occurred over the period Q1 2014-Q2 2024 that TfL has 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) about which TfL doesn't provide any details.

27. If—after what's been discovered after trying to correlate TfL's STATS19-based Road Fatality Data Reports with TfL's Quarterly Bus Safety Data is the *norm*, it appears that STATS19 doesn't pick up [1 in 5 Bus Safety Fatalities in London](#). What does that failure imply for the actual number of Bus Fatalities across the entire United Kingdom? Remember, for the period 2019-2023—the last period for which DfT has [published data](#)—the DfT officially reports that Buses and Coaches killed, on average, *about 20 pedestrians per year*.

28. In addition to matching [Resolution 7](#) passed *unanimously* by the RMT Union's 82nd Bus Workers National Industrial Organising Conference on 11 April 2025, Amendment NC6 neatly echoes the second part of Amendment NC5 submitted on [16 March 2017](#) by Lilian Greenwood, Daniel Zeichner and Nic Dakin to the Bus Services Bill, but was *withdrawn after debate* being opposed by the Conservative Government—

"(c) it will make its bus casualty data available to the applicable authority or authorities by way of a report on at least a monthly basis.

(d) it will make its bus casualty data available to the applicable authority or authorities by way of a report on at least a monthly basis.

(2) The authority or authorities must publish on their own website, every quarter, the bus casualty data that they have collected from operators."

Member's explanatory statement

This new clause would require bus operators taking part in any scheme to subscribe to a confidential safety reporting system, to make bus casualty data available to local authorities, and for local authorities to publish that data quarterly.

—but Siân Berry's Amendment NC6 represents a *substantial improvement* upon Labour's 2017 Amendment because, [learning lessons](#) after monitoring the Bus Safety Data TfL's been forced to publish for public scrutiny for over a decade, Amendment NC6 requires LTAs to "annually submit bus safety performance data to an independent auditor for the purposes of the independent auditor assessing the data's accuracy."

29. Frankly, given that Amendment NC6's 'ask' is merely to compel LTAs to publish the kind of timely and granular Bus Safety Performance Data for public scrutiny that has been—

- a policy of the UK's largest and longest-running Bus-Franchising LTA for over a decade.
- advocated by one of the country's largest Bus Workers' unions.
- an Amendment tabled by Labour MPs in March 2017.

— the Government has no credible reason to oppose Amendment NC6, and I would strongly urge Members to carefully scrutinise the arguments and data Ministers have used to oppose ensuring that Transparency about Bus Safety Performance appears on the front of this Bill.

F. Comments on Amendment NC7 - "Working Hours of Bus Drivers should conform to those of UK Lorry Drivers" a.k.a "Rowan's Law"

General Comments on Amendment NC7

30. In 2018, Matt Western MP launched a 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.' Western was moved to undertake his campaign after the [10 October 2015 Bus Crash Death](#) in Coventry of Rowan Fitzgerald (age 7), whose family lived in his constituency. Based on the BBC Report about the case— "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 fatal bus incident was convicted, but was spared jail time by the judge, apparently because of his advanced age and declining health status.

31. 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.
32. 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."
33. 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 of shift lengths, patterns and rotas".
34. RMT Union's 2025 Bus Workers National Industrial Organising Conference unanimously approved a [Resolution](#) (No 8) calling for "Amending the Bus Services [No. 2] Bill to include Safety Revisions for Driving Hours."
35. Given the sheer amount of publicly available science-based data that clearly evidences the direct 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.

Specific Comments on Amendment NC7

36. In the [13 February Debate](#) in the Lords, Lord Peter Hendy rejected the identical clause ([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 Science-based Analysis which contradicted what (a) Loughborough University, (b) UCL and (c) 3 London Assembly Transport Committee Investigations (the last being published in [March 2024](#)) confirmed about the TfL's Franchised Bus Operation: Bus Driver Fatigue is endemic, long-standing, danger-causing and has yet to be mitigated. Is it no coincidence that the Minister was previously TfL's longest-serving Commissioner?
37. 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 out against it and, it would appear (c) the Amendment's Sponsor appeared to change 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 NC5 and Amendment NC6 are included in this Bill.

38. Regardless, Amendment NC7 does go some way to partially mitigate the dangerous fatigue-inducing Bus Driver Working Conditions that (a) the University of Loughborough and UCL have already evidenced as a chronic problem among TfL Bus Drivers and (b) most certainly caused the death of young Rowan Fitzgerald in October 2015 and I urge the Committee to support it.

G. Comments on Amendment NC8 — Safety Qualifications of LTA Officials involved in Bus Operations

General Comments on Amendment NC8

39. For those Local Authority officials handing out and managing franchises, is compelling their LTA employers to ensure that they possess recognised UK safety credentials such a big ask? Many of our trade unions offer NEBOSH and IOHS Certification Training to members for free. So why not ensure that those LTA professionals contracting, managing and enforcing the local Public Bus Operations and Franchises this Bill will make possible will be trained in the safety implications of their work?
40. RMT Union's 2025 Bus Workers National Industrial Organising Conference unanimously approved a [Resolution](#) (No. 9) calling for amending Bus Services [No. 2] Bill to include Basic Safety Competence Requirements for Local Authority Officials made responsible for Operating and/or Franchising Bus Services.

Specific Comments on Amendment NC8

41. When this Amendment was presented by Lord Hampton in the Lords (as [Amendment 61](#)), the language used to oppose this Bill by the Ministers Lord Hendy and Simon Lightwood, frankly, *shocked* me. Quoting directly from Simon Lightwood's 28 February 2025 Letter (Annex 1)

"Part of the government's bus reform is to simplify and speed up franchising and drive down costs."

42. As the former director of a mine in South Africa, if I had ever used 'it costs too much' as an *excuse* for rejecting any reasonable action that *might* make my operation function more safely and, afterwards, someone had been killed from *any sort of safety failure*, a written statement like the Minister's in my file would have gone down very badly with the Mine Safety Regulator. I encourage the Committee to probe why the Minister thought using an unsupported "costs too much" excuse was sufficient evidence to oppose a non-controversial requirement like Amendment 61 (now NC8).
43. For the first time in decades, this Bill will empower Local Authorities to own or operate or franchise Local Public Bus Services. Why should the LTA professionals paid to contract, manage and enforce this new activity *not possess* nationally recognised safety accreditation? We already have the sad experience from London where TfL has

consistently vested executives [with little or no](#) Professional Safety Qualifications with extensive powers to take decisions that have a direct effect upon the safety performance of London Bus Operators and the working conditions of their employees. In fact, TfL's present Chief Safety Officer was appointed to that key role in September 2019 with [no professional safety qualifications](#). And, in my view, the lack of such qualifications was [obvious](#).

44. 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 during the [13 February Lords Debate](#)—"the structure of the contract on which those franchises will be based needs to be looked at carefully in the light of safety considerations"—LTAs often also control decision-making and budgets that directly affect Bus Driver welfare that might not immediately appear related to safety, *but obviously do*. A good example of this is TfL's responsibility for Toilet Provision for Bus Drivers. In February 2022, the Mayor [admitted](#) 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*.
45. So that some "common sense" might be evident in the front of this Bill, I urgently recommend approval of Amendment NC8. In my view, the "doom loop" of London's worsening [bus safety performance since 2009](#) provides ample evidence of what can happen when LTA executives who don't possess recognised safety credentials are given a free hand by politicians to contract and manage Public Bus Services.

F. Endorsement of Clause 39 "Implementing a Vision Zero programme"

46. At the Bill's final stage in the Lords—and I assume motivated by the Government's continued rejection of his 4 Safety Amendments 58-61 (now NC5-8)—Lord Hampton proposed a [fifth Bus Safety Amendment](#). Although Lord Peter Hendy swiftly indicated the Government's opposition to this Amendment, Lord Hampton insisted upon a vote, and it won by a safe margin of [240 to 148](#).
47. The wording of this Amendment is broad and, frankly, for an Industry that could imagine that it [might have a safety problem](#), uncontroversial.

"The Secretary of State must work with bus service providers, trade unions, professional bodies, and appropriate training institutions to implement a Vision Zero programme within the bus sector, modelled on best practice in the industry, with the aim of eliminating serious injuries in the course of bus operations."

48. I recommend **changing** "with the aim of eliminating serious injuries in the course of bus operations " to "with the aim of eliminating **deaths and** serious injuries **in or by a bus** in the course of operations" which conforms more to TfL's [stated "Vision Zero" metric](#).
49. Based on the fact that the number of deaths from preventable Bus safety Incidents was one-third higher in 2024 than 2016 and the Mayor's stated Vision Zero 'ambition' is "no one to be killed in, or by, a London bus by 2030", I believe that it is incumbent upon the Committee to scrutinise London's Vision Zero Programme within the context of the Safety of the London Bus Franchise Model (cf. Section J, *below*).
50. Now the Government wants Clause 39 "Implementing a Vision Zero programme" Clause—*removed*. I urge the Committee to ask Ministers to provide detailed evidence as to why they honestly think that the UK Bus Industry can't learn from a national Vision Zero Programme. Moreover, I encourage the Committee to invite the Survivors (or their families) of preventable Bus Safety Incidents to appear with Ministers while they explain why such a Clause is not necessary for this Bill.

G: Proposed New Amendment: Creation of a National Bus Crash Investigation Branch

51. 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 class' 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.
52. In 2017, Recommendation 10 of the London Assembly Transport Committee's landmark July 2017 Bus Safety Investigation instructed TfL —

"to carry out a review into how bus incidents are investigated in London. In particular, it should consider:

- whether serious incidents should be investigated by an independent body, as occurs in the rail industry
- how to make incident reporting more consistent between operators
- how to ensure that lessons are learned from all incident investigations and shared between all operators"

53. Although TfL's October 2017 response to the Committee confirmed "We [TfL] would be in support of the formation of an independent body to investigate serious incidents on the bus network similar to the Rail Accident Investigation Branch (RAIB) in the

railway industry", further [questioning](#) of the Mayor (and TfL Chair) by the London Assembly on this matter has repeatedly produced the same response: "Bus operating companies are best placed to commence investigations into collisions involving buses." As far as I know, TfL public buses are the only form of UK public transport whose owners and operators are permitted to investigate collision incidents involving their own vehicles. Might that explain why both [Bus Crashes](#) and [Deaths from Bus Crashes](#) have been increasing since 2009?

54. A February 2022 Loughborough University Report "[Strategic analysis of current bus safety issues: A Review](#)" noted "in direct contrast to other public or passenger transport modes including aviation, rail, and marine transportation where in each modality, there are independent bodies which investigate safety-related events (both crashes and near misses) and recommend safety changes."
55. RMT Union's 2025 Bus Workers National Industrial Organising Conference unanimously approved a [Resolution](#) (No. 10) calling for amending Bus Services [No. 2] Bill to include the creation of a National Bus Crash Investigation Branch.
56. 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'.
57. 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.
58. During the Buses Bill debates in the Lords, Lord Peter Hendy repeatedly claimed that the DVSA and the Traffic Commissioners provide adequate safety regulation of bus operators and services. Let us examine the Minister's claim:
 - the DVSA's remit does not cover bus operations or operators: it licenses vehicles and drivers. The Traffic Commissioners do licence bus operators, but their total annual budget, nationwide, amounts to less than £1.8 million.
 - Simply put, Transport Commissioners have no resources to undertake bus crash investigations, and no resources to engage with the bus industry on safety improvements. In their [latest annual report](#), the Traffic Commissioners admit to failing on seven out of the twelve measures in their Service Level Agreement, and they describe the difficulty in recruiting and retaining staff.
 - To me, it appears that the Transport Commissioners represent a demoralised and failing service, and I would encourage MPs to scrutinise the Government's opposition to the creation of an Independent Bus Crash Investigator with a direct reference to Lord Hendy's recent statements to the Lords.
59. This Bill provides the opportunity to align the Structure of Safety Investigation for the ['most used form of public transport'](#) with those found in the Rail, Air, Maritime and

Automated Vehicles sectors, and I would urge Committee Members to ensure that that Structure for Safety Investigation for UK Public Buses is as at least robust as that already established for Automated Vehicles by the last Government.

H. Reforming how UK Bus Fatality Data is Recorded *and* Reported: We need a National Bus Safety Performance Data Standard

60. Analysis of London's published Bus Safety Performance Data [reveals](#)—

- London's current "Vision Zero" Mayor and TfL Chair has been in office, preventable safety-related deaths "on or by a bus"—[that the public is made aware of](#)— have risen by 33% (from 12 in 2016 to 16 in 2024), despite a 4% decline in the number of bus miles driven over that period.
- Since May 2016, at least 92 people have lost their lives to a preventable safety incident "in or by a bus" in London.
- Analysis of TfL's published data clearly shows that during every year from 2014-2023, an average of 1 in 10 pedestrian deaths from Road Traffic Collisions in London each year involved a TfL Bus. In 2024, that chilling ratio increased to *1 in 7*.
- Since 2016, in London there's been an increase in *deaths per bus mile* of 40%

We only know these facts because the previous Mayor compelled TfL to publish its Bus Safety Performance Data for public scrutiny [in 2014](#).

61. On [13 February 2025](#), while the Government was speaking to derail Lord Hampton's Amendment 59 (NC6's predecessor), we heard Lord Hendy tell the Lords

"As we have heard, franchising authorities report safety in detail, and I expect that a consequence of this Bill, as it enables other franchising authorities to be established, will be to enable them to report safety in a similar way to how London and Manchester already do."

62. While the Minister is certainly correct about London, I advise the Committee to request the Government to provide any up-to-date information it possesses about Manchester publishing its Bus Safety Data Performance Data for public scrutiny. I am aware of a [23 October 2023 Public Letter](#) from a Bus Driver addressed to Mayor Andy Burnham requesting the Mayor of Manchester to act on this specific issue, but aside from the 5 December 2025 response that the Bus Driver received from the LTA (TfGM ref. 806113)—which confirmed that LTA's intention to collect and publish Bus Safety Performance Data yet indicated "it would likely be 12 months before it is introduced". Meanwhile, while I note TfGM's website contains plenty of information about [Bus Punctuality](#), I can't find anything about Bus Safety Performance, although it is clear that [preventable Fatal Bus Safety Incidents](#) do occur in Manchester.

63. In my view, the Manchester' LTA's admission that it would take "12 months" for it to decide what Bus Safety Performance Data it should be collecting and reporting from the first day the Local Authority took "control", deserves to be addressed in this Bill. Accordingly, given the manifestly obvious deficiencies of the STATS19 methodology and the long-running well-evidenced problems with TfL's published data, this Bill should provide for the creation of a unified National Bus Safety Performance Data Standard that would be mandatory for each LTA to adopt and implement.
64. My advocating a National Bus Safety Performance Data Standard should in no way be considered to reflect my support for a rote nationwide duplication of what TfL publishes every Quarter, but rather, it should reflect the lessons learned from monitoring TfL's over-decade-long experience of being compelled to publish this data for public scrutiny.
65. In my experience, TfL's *institutional* resistance to publishing its Bus Safety Performance data is evident in both the timeliness and the quality of the datasets it's committed to publishing—*often with great delay*—every Quarter. This Bill could remove the temptation for LTAs to "*play politics*" with both the composition and timeliness of Bus Safety Data by committing them to publish to an independently-determined National Bus Safety Performance Data Standard so that verifiable, auditable and comparable Bus Safety Data Performance Datasets are produced for *the same periods* (e.g., Quarterly), at *the same time* (within seven days after Quarter's end), by *every UK LTA* that chooses to have control over its Public Bus Services through ownership, franchising or other structures currently available or empowered by the Bill. The public has a *right to know* how safe the public bus operations controlled by their LTA are performing in a timely and easily accessible manner.
66. To provide Members with a sense of urgency for the need for a unified National Bus Safety Performance Data Standard, I'd like to provide some examples from London to show how even Bus Safety Performance Data published by that "world leading" LTA is failing.
67. On 3 August 2024, 8-year-old [Ada Bicakci was killed](#) by the Driver of an Arriva Route 99 Bus on while she was cycling with her family near Bexleyheath. Members should note that STATS19 Data does not record the Bus Operator or Route Number related to the incident, but TfL's "[Road Fatalities in since London since 2019](#)" spreadsheet does confirm that the road fatality which took place on that date at the road adjacent to Bexleyheath was a "pedal cyclist". However, TfL's latest [Bus Safety Data Release](#) spreadsheet (Line 70400, TfL ID 351354) shows the "female" "child (0-12)" Bus collision victim was a "pedestrian" whose incident outcome was "taken to hospital". According to TfL's Bus Safety Data Release, Ada wasn't killed, yet TfL's Road Fatalities in since London since 2019 clearly shows she was. *Two different data sets. Two different existential outcomes for the same incident on the same day. One LTA*

responsible for publishing both. In my view, this is what happens when a LTA feels under no obligation to live up to any data standard.

68. The complete lack of any "joined up" principles linking TfL's two published datasets that reflect Bus Safety Performance immediately calls into question the integrity of both. The first contains the correct injury outcome and travel mode of the victim, while the second contains additional granular and useful incident data, but it does not record the correct injury outcome. The Mayor—*completely within his rights*—has [refused](#) to produce a "bespoke" correlated dataset that would *show all the actual* deaths from preventable Bus Safety Incidents "in or by a bus" in London, so the public is [compelled to do that](#) on its own. A National Bus Safety Performance Data Standard empowered by this Bill would compel the Mayor of London (and any LTA that controls its Public Bus Services) to ensure that all the data cited by the LTA was correlated, audited and correct at the time it was published. We are talking about people killed by public buses under the control of an LTA. Is compelling the LTA to collect and publish the correct casualty figures in a timely and easily accessible manner for public scrutiny really such a big ask? How is the public served by the Mayor of London's witting lack of transparency on this issue?
69. In London, I believe the public are paying for the Mayor's indulgence of TfL's—in my view, *deliberately incompetent*—handling of Bus Casualty Data, because no one knows the actual number of how many people are killed and injured by TfL Buses each year. Moreover, since TfL refuses to publish that reality-based figure, if presented with an evidenced-based total based on its published data, the Mayor and/or Transport Commissioner can always say ["TfL does not recognise this number"](#). And [they often do](#). How is the public interest served by this LTA's lack of accountability for the integrity of its Bus Safety Performance Data?
70. In a recent response to a Mayor's Question Neil Garratt (cf. [Question 2025/2079](#), 19 June re: "The "Doom Loop" of TfL's Bus Safety Performance"), the Mayor of London stated "there is rightly concern that 13 people were killed in collisions involving buses in 2024". However, a quick consolidation of the uncorrelated and, obviously, [unaudited](#) fatality data TfL publishes variously on its downloadable ["Bus Safety Data Release"](#) spreadsheet and its ["Road fatalities in London since 2019"](#) spreadsheet clearly show that 9 pedestrians and 3 cyclists—i.e., 12 people—were killed in Bus Collision Incidents in 2024, with a further 4 passengers killed in, variously, onboard falls, activity incidents and otherwise undefined preventable safety events. Simply put: TfL's published data shows there were 16 Safety-Related Bus Fatalities in London in 2024.
71. However, further investigations of the data found on these spreadsheets reveals that, although the Mayor's figure of "13 deaths from collisions " correlates perfectly with the total number mentioned in [TfL's 29 May 2025 Press Release](#), it differs *substantially* from the 12 collision deaths —i.e., 16 Bus Safety Deaths —that can be easily

calculated (if one is motivated and knows where to look) from data published on TfL's website. To confuse the picture even more, TfL's press release stated, "13 people were tragically killed in collisions involving a bus, (11 outside, and 2 on board)", a total sum whose components do not correlate with the data found in either the "Bus Safety" or "Road Fatality" spreadsheets.

72. The fact that the Mayor of the country's largest city and Chair of the LTA that contracts the largest and longest-running Franchised Bus Operation *does not know* the actual number of the people killed by TfL Buses in 2024 speaks volumes about the fact that, even if Amendment NC6 is found on the face of this Bill, a National Bus Safety Performance Data Standard needs to be created to ensure that all UK Bus Safety Performance Data released by LTAs is based on reality.
73. Surely a Bill that is mandating that LTAs collect and distribute—but not publish for public scrutiny?—meaningful data about Assaults on Buses and at Bus Stops can catalyse the creation of a National Bus Safety Performance Data Standard. I believe that LTA Chairs like the Mayor of London should be reporting correct Public Bus Fatality Data that is easy for the public to find and confirm. I also believe that that LTAs that control their Public Bus Services shouldn't be given the excuse of needing "likely 12 months" to produce a Public Bus Safety Performance dataset that, in a truly safe system, the absence of which wouldn't have to be pointed out by an alert Bus Driver from Nottingham.

J. Independent National Inquiry about the Safety of the London Bus Franchise Model

74. On 5 November 2024, hundreds of TfL Bus Drivers [marched through Central London](#) to rally in front of TfL Headquarters. The goal of the event was to publicise their demand that the Mayor of London write a ["Bus Drivers' Bill of Rights"](#) into TfL's [Framework Bus Contract](#) (which dates from [1 January 2016](#)).
75. By any estimation, the "Rights" London Bus Drivers are asking for—
1. The Right to a safe work schedule without any forced overtime or loss of pay
 2. The Right to a decent and proper rest break in the working day
 3. The Right to drive a safe and well-maintained vehicle
 4. The Right to clean, serviced toilet and rest facilities on all bus routes
 5. The Right to report safety concerns without fear of retribution from TfL or employers
 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
 7. The Right to relevant and timely safety training
 8. The Right to drive without being forced to answer radio messages and texts from Controllers whilst in motion
 9. The Right to have all company rules in writing and clearly displayed

10. The Right to be treated with dignity and respect by our employers, TfL and the public

11. The Right to Working Air Cooling in our cabs in the summer heat

12. The Right to Working Heaters in our cabs in the cold of winter

— are *human rights*. And while Members, no doubt, will have seen presentations from TfL lauding its "Safe System" approach to managing Bus Safety in London, in my experience working in the international industrial sector for decades, there is nothing "safe" about denying Bus Drivers any of the reasonable 'demands' that these London Bus Drivers are requesting. In fact, that they must ask for them *at all* is *prima facie* evidence that TfL's Bus Operation represents an Unsafe System that should not serve as model for any LTA.

76. To date, without presenting any evidence to counter the Bus Drivers' [long-standing](#) and [well-evidenced claims](#), the Mayor has [refused](#) to even consider incorporating the Bus Drivers' Bill of Rights into TfL's [Framework Bus Services Contract](#), which highlights a key risk to Bus Drivers Working Conditions presented by this Bill that, at least for excessive Bus Driver working hours, Amendment NC7 would partially mitigate.

77. However, there is a fundamental disconnect between the [well-evidenced](#) and long-running [concerns](#) raised by the [Bill of Rights Campaign](#) and the new powers being extended to Local Authorities across the country by this Bill. Without an Independent Inquiry about the Safety of the London 'Contracted Bus Market' Model [as called for](#) (and supported unanimously) by the RMT Bus Workers 81st National Industrial Organising Conference in 2023, I feel that all the many safety lessons we have learned from London's experience of being "in control" of its public Buses will be lost or, much more likely, ignored by LTAs and their political leaders. And, while I appreciate the excellent work the London Assembly has done over the years to scrutinise TfL's poor Bus Safety Record, its Investigating Committees' political structure and lack of any enforcement power means the Mayor can ignore—and he regularly does—both its recommendations and its Members' [asks](#). Based on all the evidence we have about the [systemic safety failings](#) of TfL's Bus Operation that is now available [on the public record](#), without an independent "[Lord Cullen-style](#)" investigation of TfL's Bus Safety Culture, this Government's continual advertisement of "[London-style Bus Services](#)" as the goal of this Bill is, in my view, frankly, [negligent](#).

K. Conclusion: Will the Buses Bill give us State Regulation or State Capture on Bus Safety Policy?

78. January 2019, my MP Tulip Siddiq (copied) posed a [Written Question](#) to the Government highly relevant to Amendments NC5 and NC6

"To ask the Secretary of State for Transport, what assessment he has made of the effect of departmental guidance accompanying the Bus Services Act 2017 in increasing (a) the implementation of independent, confidential reporting systems and (b) the release of bus safety incident data."

The response from the Conservative Government could have been given by Labour Ministers today:

"The Department encourages local authorities to think about how they can use the tools in the Act to improve bus safety in their area. In particular, we would encourage local authorities to consider the benefits of an independent confidential reporting system (ICRS), and release of bus safety incident data, when they are forming a partnership or franchising scheme. It is up to local authorities to determine what measures, if required, to improve bus safety in a particular area."

The Government's response to a follow-up [Written Question](#) Tulip Siddiq asked in July 2019—

"To ask the Secretary of State for Transport, pursuant to the Answer of 14 January 2019 to Question 205992, what steps he has taken to encourage local authorities to require bus operators (a) Arriva, (b) Comfort DelGro and (c) RATP franchise to report their bus safety performance data on an annual basis."

—also [eerily echoes](#) those given by Ministers today.

"London bus services are the responsibility of Transport for London and the London Mayor who is responsible for all aspects of services including bus safety.

Bus services outside London are deregulated and provided on a commercial basis by private operators. It is for individual local transport authorities in those areas to determine what powers in the Bus Services Act 2017 are used to address bus safety issues. For example, under a franchising scheme, bus operators could be required, by the franchising authority, to provide bus safety data at specified intervals."

79. Can you imagine if Train, Air or Maritime Safety were determined by the UK local authority where the Train, Airplane or Ship was based or operated? Even though a substantial majority of public Bus Operations in the UK are concentrated in a few private Bus companies, at present this Bill contains no provisions for well tested Safety Policies that can be applied nationally. And even though Bus Drivers across the country have identified the same safety concerns as those brave London Bus Drivers campaigning for the London Bus Driver's Bill of Rights, just like Bus Crashes, their universal concerns are deemed to be 'local' special cases and no reflection of a systemic failure on a national scale. According to TfL's published data, the number

of people killed in preventable Bus Safety Incidents in 2024 in London was more than double that of those killed in the November 2016 Sandilands Tram Crash. But, in support of this Bill, TfL's Bus Franchise Bus Model is being lauded by this Government as a model for LTAs.

80. The Bus Services [No. 2] Bill creates an opportunity for this Government to ensure that Safety is the first priority for Public Bus Operations across the United Kingdom. While years of survey results from [TfL](#) and [Bus and Passenger Lobbying Groups](#) make it clear that timeliness, speed and convenience take precedence over all other passenger considerations, I believe that the 'Doom Loop' of London's years of Failing Bus Safety Performance are a sufficient warning about the loss of lives and livelihoods *that are inevitable* when politics puts *what Bus Users want* over that which is in the interest — and experience—of *public safety*. Assuming that one of the key roles of a state is to protect the lives of the people who live within it, a late running bus is not the sign of a failing state. But, in my view, a bus whose—*take your pick*—pressured-by-a-controller/distracted/fatigued/hot/bursting-for-a-toilet driver kills and injures people only so its owner can profit or politician can benefit from that driver's Bus meeting a publicly-contracted timeliness target *surely is*.
81. I believe that the chilling observations about the years of TfL's and its contracted Tram Operator's manifestly Failing Safety Culture that can be found in the 27 July 2023 [Sentencing Remarks](#) of Mr Justice Fraser to The Central Criminal Court (Office of Rail and Road vs. Transport for London and [First Group] Tram Operations Limited, can serve as a useful proxy for the kind of conclusions that an Independent National Inquiry about the Safety of London's Bus Franchise Model might produce. Why? Because the [same people](#) who established and managed the Croydon Tram went on to establish, manage and enforce the TfL Bus Franchise Model this Bill will roll out nationwide. In my experience, *the acorn does not fall far from the tree*.
82. If this Bill fails to incorporate the well-evidenced lessons we've learned in London about the (a) lethality of franchised Bus Operations (b) reality of how Vision Zero is measured by TfL and the Mayor (c) materiality of the wisdom received from decades of independent safety investigations in the Rail, Air and Maritime industries, people will die needlessly from preventable Bus Safety Incidents and, as London as evidenced since 2009, with increasing frequency.
83. When I started looking for TfL Bus Safety Data on my laptop from my hospital bed in February 2010, there was nothing available in the public domain. There were lots of horrific press reports, but no official data published anywhere to which these ghastly incidents could be correlated. Today, we have lots of data about Bus Safety Incidents in London, but nothing comparable across the UK. Ignorance will not improve the Operational Safety Performance of UK Public Buses and we must not let any Government make any laws based upon it. I urge Members to oppose the Government and support putting Safety on the front of this Bill.



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Your Ref: AN30906

28 February 2025

Dear Alex,

Thank you for your letter of 17 February, enclosing correspondence from Lee Odams, an RMT Branch Secretary about the Bus Services (No.2) Bill.

The Government is deeply concerned about bus drivers and passengers' safety. There are comprehensive standards that bridge all aspects of bus operations – across roadworthiness of vehicles, operation of services and driver standards. These are enforced by a number of organisations including the Driver and Vehicle Standards Agency. Operators of these vehicles are licensed by Traffic Commissioners, who consider any non-compliance issues, and ensure operators are effectively regulated.

Amendment 58

Being able to report safety concerns in a confidential manner is clearly important. This is why a number of official routes exist to allow anyone to provide confidential, anonymous reporting on safety and standards in the bus sector - potentially backed up by enforcement. For example, anyone may anonymously report a lack of safety or conformation to standards in the bus sector to the DVSA intelligence unit, which may use this information to investigate the situation, including by working with other government departments and agencies, as well as police forces.

In addition, the operators of the vehicles are licensed by the traffic commissioners, who consider non-compliance issues seriously and ensure that operators are effectively regulated. The judicial process of the traffic commissioners can and does result in depriving people of operators' licences and depriving managers of their certificate to run bus operations.

Though, CIRAS is a third-party service, and it would not be appropriate to include them within scope of this Bill, my colleague, Lord Hendy of Richmond Hill, encouraged employees of member organisations to consider using this service where appropriate in the House of Lords, recently.

Amendment 59

The Department already collect data in respect of reported collisions involving personal injury and publish this information at the local authority level, with records of individual collisions also being published as open data. This is carried out through the STATS19 framework, which relies on reports from the police.

Data is also collected from Public Service Vehicle (PSV) operators who must report incidents to the Driver and Vehicles Standards Agency thanks to the PSV operator licensing requirements.

Though these datasets already provide a comprehensive picture of bus safety incidents on the public highway, we are investigating avenues to ensure address gaps elsewhere, as Lord Hendy committed to in Parliament.

Amendment 60

The maximum permitted daily driving time a bus driver who is providing a regular bus service where the service length does not go beyond 50km is 10 hours. The maximum permitted driving time for a driver providing a service which goes beyond that as well as coach drivers and HGV drivers is 9 hours, extendable twice a week to 10 hours.

The regime would still vary, including allowing some drivers to work ten hours on some days. A daily limit of ten hours driving is well-and long-established in UK European law.

In addition, the Department has been advised by bus operators that this would result in an increase in the number of drivers having to work split shifts. This is likely to be unpopular with bus drivers as it would likely mean they would have to wait around at operating bases for a number of hours and could reverse work operators have done to avoid drivers working split shifts. Such a change may also limit a driver's earning potential due to a reduction in the maximum number of hours they could work.

There may also be an impact on the significant progress which has been made in the last couple of years in addressing bus driver shortages given the additional number of drivers required to undertake the same amount of work.

Amendment 61

Safety is paramount for bus staff, passengers and the wider public but there are only a small proportion of franchising cases where a IOSH and NEBOSH certification would be relevant.

Part of the government's bus reform is to simplify and speed up franchising and drive down costs.

This amendment would disproportionately impact authorities from considering franchising, including those in smaller towns and rural areas. This would disenfranchise local authorities and that goes against some of the core tenets of this Bill.

On 17 December 2024, the Department also published updated franchising guidance. The guidance will also put the needs of passengers and bus drivers first - by encouraging local transport authorities to consider driver welfare and passenger safety. Further bus franchising guidance will be published once the new powers under the Bill have been enacted, and the department will continue to undertake this best practice-focused approach to developing further iterations.

The Government has engaged key stakeholders, including trade unions, throughout the Bill's development and passage through Parliament. I hope that this reassures you, and Mr Odams, that the Department is absolutely committed to ensuring safety in the bus sector.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Simon Lightwood', with a long horizontal line extending from the end of the signature.

SIMON LIGHTWOOD MP

MINISTER FOR LOCAL TRANSPORT

Amendment - Bus Safety Performance Data (Memo for Lord Hampton - 28 January 2025)

1. London—which accounts for 25% of the UK Bus Fleet and 50% of UK Bus Journeys—has published detailed Bus Safety Performance Data every quarter since Q1 2014.

- In contrast to London's *actual* Bus Safety Performance—which consistently falls in the bottom tercile of its 'world city' peers—London's level of transparency about the safety performance of its contracted Bus Services really is 'world-leading';
- In December 2023, Manchester also committed to publish its Bus Safety Data in 2025.

2. Compared to London's published data, the DfT's STATS19 Data is seriously deficient and undercounts the number of people killed and injured in Bus Safety Incidents.

- 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;
- Because 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 both inaccurate and misleading*. 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;
- 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*;
- 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.

3. No other Government Agency collects nor publishes Bus Safety Performance Data as good as London's. Period.

- We have FOI Requests that prove, re Bus Safety Performance Data that (a) the DVSA collects *but does not publish* and (b) the Traffic Commissioners neither collects nor publishes;

4. Based on the DfT's published data, Buses and Coaches kill pedestrians at a substantially higher rate than either their numbers or presence (mileage run) on UK roads would predict.

For the period 2019-2023—the last period for which DfT has published data—

- Buses and Coaches killed, on average, about 20 pedestrians per year;
- 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;
- 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;
- *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.

Sources and Notes to Amendment - Bus Safety Performance Data (Memo for Lord Hampton - 28 January 2025)

1. Sources: Analysis of published DfT Data; International Bus Benchmarking Data

In March 2023, 30,154 buses were operated by local bus services in England, with 8,788 of them in London

<https://www.gov.uk/government/statistics/annual-bus-statistics-year-ending-march-2023/annual-bus-statistics-year-ending-march-2023>

<https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/refusal-benchmark-londons-safety-performance-world-city-peers>

5 Year Data (2015-2019)

<https://www.london.gov.uk/questions/sites/default/files/3828%20Refusal%20to%20Benchmark%20Londons%20safety%20performance%20attachment.pdf>

2. Sources: Analysis and Comparison of TfL and DfT Data

Cf. TfL Data <https://tfl.gov.uk/corporate/publications-and-reports/bus-safety-data> vs. DfT Data <https://www.data.gov.uk/dataset/cb7ae6f0-4be6-4935-9277-47e5ce24a11f/road-accidents-safety-data>

TfL has produced a document describing its Bus Safety Reporting Data — <https://content.tfl.gov.uk/bus-safety-data-guidance.pdf>—that provides some useful detail on how TfL’s data differs from STATS19, e.g.—

"Road safety data is comprised of reports to or by the Police on road collisions resulting in an injury and which meet the Department for Transport’s (DfT’s) STATS19 definition. Bus safety data from TfL’s SHE incident reporting and investigation system is comprised of reports from bus operators and TfL and covers a wider range of safety incidents which the police may not have attended or which do not meet the Department for Transport’s STATS19 definition. Examples include collisions on private land, noncollisions (e.g. death due to medical episodes or slips, trips and falls on a bus), incidents outside the Greater London boundary and death occurring after 30 days."

An analysis of TfL’s published data (cf. <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/vision-zero-bus-collision-injuries-bus-stations-0>) 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 (cf. <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/vision-zero-bus-collision-injuries-bus-stations>). *None of these fatal or injury incidents are recorded in STATS19 Data.*

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 doesn’t reveal any details about.

Because TfL publishes granular Bus Safety Performance Data every quarter, for the period 1 January 2014 to 30 June 2024, we know that, on average, Preventable Onboard Bus trips and falls in London sent, 2 passengers per day to hospital about 1 person a year to the morgue. Since none of these incidents were recorded by STATS19, we only know these victims exist because TfL was compelled to publish comprehensive and granular data (a) on its website every quarter and (b) through FOI Requests and Responses to Mayor's Questions.

3. Sources - Analysis of FOI Responses

DVSA says it doesn't collect such data (but then it says it might have some, but refuses to publish because it's not in one place and it'll cost over £450 to aggregate the data)- cf.

FOI https://www.whatdotheyknow.com/request/detailed_data_for_buses_coach_fa_3#incoming-902088 and

FOI https://www.whatdotheyknow.com/request/detailed_data_for_buses_coach_fa_2#incoming-895625

Traffic Commissioners don't collect - cf.

FOI https://www.whatdotheyknow.com/request/detailed_data_for_buses_coach_fa_2#incoming-895625

4 Sources: Analysis of DfT Data, inter alia

<https://www.gov.uk/government/statistics/road-traffic-estimates-in-great-britain-2023/road-traffic-estimates-in-great-britain-2023-traffic-in-great-britain-by-vehicle-type>)

<https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-pedestrian-factsheet-2023/reported-road-casualties-in-great-britain-pedestrian-factsheet-2023>

<https://roadtraffic.dft.gov.uk/summary>

<https://www.gov.uk/government/statistics/transport-statistics-great-britain-2024/transport-statistics-great-britain-2023-domestic-travel>

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