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Thank you for your letter of 4 February regarding Vision Zero.

I will take the issues you have raised in turn.

## **Fatality statistics**

It is neither inevitable nor acceptable that anyone should be killed or seriously injured when travelling in London. Our deepest sympathies are with all of those impacted by fatalities and injuries on London's roads and transport network.

Anyone involved in, or affected by, a life-changing incident on the TfL network can contact the Sarah Hope Line in full confidence, with a dedicated team on hand to make sure that people receive the necessary support and help that they need. The Sarah Hope Line is complemented by TfL's road victim support pilot run by specialists Brake and RoadPeace. On 24 March, TfL invited a selection of bidders to contract for a long-term London support service over the next three and a half years.

Working alongside the police and local boroughs, our utmost priority is the safety of Londoners and we are committed to eliminating death and serious injury on the capital's roads and transport network. Provisional data reveals that there were 109 tragic deaths on London's roads in 2024. This is one lower than the 110 quoted in your letter because the police have since confirmed that a car driver tragically died from natural causes rather than the collision. Our thoughts remain with all those lost and affected.

The increase in deaths is unfortunately, as you point out, due to more people being killed while walking last year. While this figure remains lower than every year before the pandemic, it is deeply unfortunate to have seen an increase in 2024 and we are determined to continue working in partnership with the police and boroughs to end the devastation caused by road danger.

Road safety data for 2024 remains provisional and subject to change. Final data for 2024 will be published later this year. We continue to work in partnership with the boroughs, police and other stakeholders to directly tackle road danger and continue to work on a number of major programmes to make London's roads, and the vehicles using them, safer.

## **Expenditure on Safe and Healthy Streets only increasing in line with inflation in the TfL Budget for 2025-26**

Unfortunately, demand for Transport for London services in 2024/25 has not grown the 6 per cent year-on-year that had been budgeted for. Journeys in the year to date (Periods 1-8) are up just over 1.6 per cent.

For the full year, our latest forecast is for passenger income to be £188m lower than budgeted as a result of this demand shortfall. Additionally, inflationary costs in our supply chain and the costs of the cyber security incident experienced in September 2024 have put further pressure on our finances. We are having to make difficult choices to mitigate this. In addition to retaining Local Implementation Plan underspends, savings are being targeted across our operations.

Last year we announced an extra £50 million over three years for boroughs to deliver significant safety improvements on borough roads by reducing speeds and tackling the city's most dangerous roads and junctions under a new Safer Streets programme. This funding is in addition to the £80.4 million of Local Implementation Plan funding allocated to London's boroughs in 2024/25 and will help boroughs to continue their vital work making the capital's roads safer and more attractive for people using public transport, walking and cycling.

The funding is included in the current TfL Business Plan, which sets out a budget for Safe & Healthy Streets of £150 million p/a plus inflation as in the Business Plan published in December 2023. We allocated this funding in March 2025.

## **Mayor committed at the Plenary to look again at the 2025-26 budget for TfL to see if more money can be allocated to providing safer junctions**

We are committed to Vision Zero and continue to progress projects which deliver safety improvements across London which will contribute to the Mayor's ambition that no-one is killed or seriously injured on London's roads by 2041. Despite constraints in terms of funding and resource, we are committed to making London's roads safer and will be continuing to progress a programme of safety projects, including Safer Junctions, as part of our Safe and Healthy Streets investment programme.

There are 73 junctions included in the Safer Junctions programme. We have made 45 out of the 73 junctions safe, with works at Battersea Bridge and Lambeth Bridge underway.

## **Vision Zero Action Plan 2**

As you are aware we are now working on the next iteration of the Vision Zero Action Plan 2. This will look at emerging risks and challenges on our road network and set out the path to achieving Vision Zero in collaboration with our key London delivery partners. We welcome feedback and input from key stakeholders like yourself on focus areas to explore and encourage you to please share your contributions with us whilst we bring together the new plan.

## **Bus driver wellbeing and fatigue**

We remain committed to providing all staff with the welfare facilities they need. Bus drivers play an essential role in keeping the capital moving and their welfare is our top priority.

Firstly, it is a basic human right to have access to a toilet and we ensure that drivers always have a facility within a reasonable distance, using a metric agreed with Unite the Union. This might be at one end of a route on shorter journeys, or at both ends of a route for longer trips. We also work with third parties to give access to toilets along routes, so that drivers have access to a facility if starting or ending a shift mid-route, away from their garages. We have worked closely with the Unite union and bus operators to increase the number of toilets available to bus drivers and identify any future locations where changes to bus routes might require new locations.

Regarding driver fatigue, fatigue detection technology has been fitted on almost 400 of our buses. Data from this project is expected to identify a detailed profile of fatigue in bus operations, which will be analysed by locations, rosters, routes and vehicles. The results will enable us and the bus operating companies to address the factors causing fatigue and mitigate their impact early on. Drivers at risk of fatigue will be offered support by their managers, who have received additional dedicated training.

Through the Bus Safety Programme we have expanded the data collected to help identify new trends on which to focus our interventions. For example, the research into fatigue that we commissioned from Loughborough University has led to the introduction of a workstream specifically focused on fatigue which has also inspired and informed a broader programme on fatigue management across TfL. Since then we have:

- Funded a £1m Bus Safety Innovation Challenge and rolled out a series of trial health and wellbeing interventions including sleep pods, health check kiosks and operator training
- Improved driver access to toilet facilities – now on all routes, plus agreement with London Underground to allow bus drivers to use station toilets
- Required bus operators to have Fatigue Risk Management Plans (FRMPs) and commissioned an independent review of Fatigue Risk Assessment Tools, which analyse fatigue risk in schedules
- Provided training to operators on developing, managing and monitoring their FRMPs
- Rolled out fatigue management training to 1,700 Bus Operator supervisors and managers

This remains a priority to work with both the unions and bus operators on.

## **Driver air conditioning**

All bus driver cabs are fitted with air conditioning. We have been working with bus operators to improve the maintenance of the air conditioning systems on buses and actively monitor performance. This includes appointing independent inspectors to conduct random audits of the driver's air conditioning systems.

Alongside bus operating companies, we have also introduced additional controls during hot weather, which includes relaxing uniforms and ensuring drivers take water/cooling breaks where required. Bus operator Service Control teams actively monitor and support bus driver welfare during extreme weather events.

Each bus operator is responsible for the maintenance and performance of their buses, and we are continuing to push suppliers to improve the design and efficacy of heating and cooling systems on buses.

Improving bus driver conditions in general is also addressed via contracts with the bus operators.

As requested, please find below a progress update on the recommendations on this in Driven to Distraction - Making London's Buses Safer, from the Transport Committee, published in July 2017:

	Recommendation	Progress	Summary
1	TfL should set safety targets for bus operators and integrate these into Quality Incentive Contracts (QICs).		<p>We will not put safety incentives in QICs as we believe this could affect the current open and collaborative approach to safety between TfL and the bus operators. It could encourage poor behaviours for example under-reporting of incidents by operators to meet targets.</p> <p>Operators are already highly incentivised to improve safety. They must comply with the HSE or be subject to statutory investigation and potential negative outcomes. They are effectively self-insured with excesses in the range of £250k-£500k. Directors could be fined or imprisoned for failings. The DVSA carry out checks as the enforcement arm of the Traffic Commission, under which they hold their licence to operate.</p> <p>For each operator, we compile a Safety Performance Index (SPI) based on a variety of performance indicators. Each period, they are scored based on several criteria such as incident numbers, injuries and driving standards. A weighted scoring system is used so that more serious incidents (such as a fatality or serious injury) attract a higher deduction than a less serious incident (i.e. a damage-only collision). The operator benchmark is 80% and operators falling below this are expected to demonstrate how they will improve. Operators are measured against themselves, not each other, and the score demonstrates trends over time. The evaluation of bids for route contracts includes assessment of 10 categories of performance criteria, many of which are directly related to safety. Poor performance on these measures may therefore impact on an operator's ability to win future contracts.</p>

			<p>We conduct a variety of assurance activities to supplement bus operators' own obligations under their operating licences. These include:</p> <ul style="list-style-type: none"> <li>a) The independent monitoring of quality and safety of bus driving while buses are in service</li> <li>b) Ensuring that driving schedules and working hours are compliant with legislation</li> <li>c) Independently sampling the suitability of vehicle maintenance</li> <li>d) A rolling programme of assurance visits to bus operator garages to measure the effectiveness of each operator's management arrangements and practices to fulfil their safety, health and environment obligations</li> </ul> <p>The Mayor's Transport Strategy includes specific targets for buses under Vision Zero – to achieve a 70% reduction against the 2005-09 baseline by 2022 and for no one to be killed on or by a bus by 2030. These are in addition to the main Vision Zero target which applies across all of TfL (including buses) for no one to be killed or seriously injured on our road network by 2041.</p> <p>We did not achieve our 2022 target, partially owing to changes in behaviour amongst road users and passengers post-Covid. However, in 2023 we achieved a 31% decrease since 2010-14 in Bus-involved KSIs compared to 24% for all road users. Provisional 2024 figures show a 34% decrease in Bus-involved KSIs against the baseline.</p>
2	TfL should introduce a direct link between senior staff bonus payments and bus safety performance.		We have a scorecard to determine senior staff bonuses, which includes a target for reduction in Killed or Seriously Injured (KSI) casualties.
3	TfL should improve bus collision data by amalgamating STATS19 and IRIS datasets and more accurate reporting of long-term trends.		STATS19 and IRIS will not be amalgamated but we are seeking to introduce more consistency, including through the roll-out of the Metropolitan Police Service's new Case Overview and Preparation Application (COPA) system, with handheld devices for officers to record details of incidents.

			<p>The two data sets take data from different sources and use two different data definitions. Therefore, these two datasets should not be combined or compared - by maintaining two datasets it ensures that a full picture of bus safety data enables TfL to target effective safety improvements. Both datasets are maintained and released to the public and are an accurate account of incidents involving a bus according to their specifically defined parameters.</p> <p>We have also reviewed using hospital episode data, but we found that this would depend on further work by the Department for Transport and the NHS.</p> <p>We commissioned in-depth research into bus incidents to identify trends and inform the bus safety programme, published here in 2018: <a href="https://content.tfl.gov.uk/analysis-of-bus-collisions-and-identification-of-countermeasures.pdf">https://content.tfl.gov.uk/analysis-of-bus-collisions-and-identification-of-countermeasures.pdf</a></p> <p>An update to that research is currently in the process of being commissioned. Keeping our evidence base updated is a key part of our data-led strategy for bus safety.</p>
4	TfL should commission an independent investigation into bus drivers' working conditions, with a focus on the causes of fatigue.		<p>We are not planning to commission a review on this topic at this time.</p> <p>We maintain that our new safety measures will encourage operators to address any risks. The ongoing use of fatigue detection technology aims to provide us with better data about when fatigue is occurring and the factors which contribute to it.</p> <p>We share existing evidence on combating fatigue with bus operators and continue to collaborate with them regularly through our regular fatigue, health and wellbeing working group.</p>
5	TfL should work with operators to reduce the number of distractions bus drivers face, covering vehicle maintenance, toilet provision, radio contact, and bus lane and bus stop infrastructure.		<p>In 2023/24 we provided three new toilet facilities at Colindale, Bessborough and Wembley. We also completed the renewal of 24 welfare facilities for bus drivers. To support the Superloop, new toilets were also provided at Walthamstow – South Grove, North Thamesmead and North Woolwich.</p> <p>In 2024/25 we have provided two new toilets so far to support routes 6, 9 and 172 at the Strand and route 281 at Tolworth. Construction for two new toilets at Gravel Pit Way and Coppermill Lane are due to commence this financial year and will be brought into use next year. We also completed handover of the new bus driver</p>

			<p>facilities at Steve Biko Way with a driver toilet, Springfield University Hospital with a driver toilet and Canal Reach Kings cross with toilets and a mess room. We have also installed a temporary toilet at Old Lodge Lane to support the extension of route 312, and plan to make this permanent as soon as possible.</p> <p>This year, we are also looking to complete the renewal of 12 welfare facilities. This includes increasing capacity on Archway Road, refurbishment of toilet facilities at Morden LU station and a complete renewal of the driver facilities at Southgate (due to complete end of February 2025). Targeted welfare renewals have been completed at Chiswick Park, Avondale Road, Kensal Rise, Millbrook Park, Ilford Hainault Street mess room, Peckham mess room, Mortlake and Crossharbour East Ferry Lane.</p>
6	TfL should take responsibility for bus driver safety training, as it has for customer service training.		<p>We will not take responsibility for safety training. It is a critical part of the bus operators' O-Licence conditions. Bus drivers must undertake five days of Certification of Professional Competence (CPC) training, every five years, to maintain their licences.</p> <p>However, we are working with operators to develop safety training materials for bus drivers and driver trainers. Training is developed in partnership with bus operators and includes initial training, annual training and reactive training.</p> <p>Initial driver training requires a City and Guilds Level 2 bespoke qualification. New training is being developed in 2025/26. All four units have links to safety including: safe driving, vulnerable road users, slips trips and falls, and fatigue.</p> <p>Previous driver CPC courses have included Hello London (Customer Experience), Destination Zero (Safer Driving), and currently Driving Inclusion (Equality Diversity and Inclusion). Hello London and Driving Inclusion include direct references to safety to emphasise it impacts all customers and road users.</p> <p>We also provide and support reactive training for bus drivers on how to support customers during incidents related to Safety and Security (terrorism and acid attacks), violence against women and girls and hate crime.</p> <p>A project is taking place this year to identify training needs and gaps in provision.</p>

7	TfL should commit to a publication date for the Bus Safety Standard (BSS) and undertake a cost/benefit analysis for retrofitting the BSS to the entire bus fleet.		<p>We published the Bus Safety Standard (BSS) in 2018. As part of this, the Transport Research Laboratory (commissioned by TfL) developed a cost-benefit model describing the value of implementing the safety measures, both in terms of casualties saved and the technology and operational costs to achieve this. This modelling helped inform the decisions of our bus safety development team in terms of implementing the safety measures on new buses.</p> <p>Some features of the BSS, for example the front-end design, are not easily retrofittable to older vehicles. It is therefore not possible to retrofit the entire BSS, but we are progressing a programme of retrofitting key BSS features such as Intelligent Speed Assistance, Acoustic Vehicle Alerting Systems and Camera Monitor Systems. In each case, vehicles with the longest time remaining in the fleet have been prioritised so as to maximise the benefits and value for money.</p>
8	TfL should conduct a review of bus maintenance practices and work to understand the scale of the bus engineer shortage.		<p>We will not be conducting a specific review on these issues.</p> <p>There are regular Bus Operator Engineering Forums where maintenance issues are discussed. We operate an Engineering Quality Monitoring (EQM) programme to oversee roadworthiness standards of buses are maintained. The assurance scheme includes a 25% annual check of our fleet carried out by independent professional vehicle examination providers. This involves inspection defect criteria to DVSA technical standards - audits are random and spread evenly out over the year across all bus operators.</p> <p>Results are monitored by our Engineering, Bus Operations Performance, Safety, Health and Environment and Bus Route Contract Tender teams.</p> <p>Operators are also subject to inspections by the DVSA on behalf of the Traffic Commission. If they are 'Earned Recognition' operators then they must provide vehicle maintenance information direct to the DVSA.</p>
9	TfL should clarify that the Confidential Incident Reporting and Analysis Service (CIRAS)		<p>All London bus operators have processes for staff to raise issues and complaints. The confidential reporting service (CIRAS) complements these processes and provides a reporting tool where staff can report</p>



	can be used as a first-line reporting tool, and communicate information about CIRAS to all drivers.		<p>confidentially.</p> <p>We and CIRAS continue to work collaboratively with the bus operating companies to promote CIRAS, and ensure it continues to be included in driver training and induction, as well as being advertised well in garages.</p>
10	TfL should carry out a review of how bus incidents are investigated in London, including consideration of making investigations independent, ensuring consistency and distributing good practice.		<p>We regularly monitor the effectiveness of our established investigation arrangements, and are in the process of making some improvements to how we commission investigations into the most serious incidents.</p> <p>While independent investigation bodies are in place for other transport sectors, this has sadly not come to fruition for the road or bus industry.</p> <p>Where the police or Health and Safety Executive undertake investigations into serious bus incidents, we seek to work collaboratively with them wherever possible. In the absence of such independent investigatory body, we take steps to ensure consistency and that good practice is being shared. We are keeping these steps under review to ensure they enable the identification of root causes and remedial actions.</p> <p>Together with the Bus Centre of Excellence, we are working through the new Bus Knowledge Sharing and Incident Network to share best practice, learn from others outside London and encourage wider collaboration in safety. The Bus Knowledge Sharing and Incident Network is free to join and currently has over 50 members nationally. Recent webinars have taken place on fatigue, pedal application error and driver health and wellbeing. Shared learning is currently taking place on good bus station design. A national Bus Safety Conference led by the Bus Knowledge Sharing and Incident Network will take place in late spring 2025.</p>
11	TfL should publish an update on the Bus Safety Standard in January 2018.		<p>TfL published an update in 2018. A link to the update is here: <a href="https://content.tfl.gov.uk/bus-safety-standard-executive-summary.pdf">content.tfl.gov.uk/bus-safety-standard-executive-summary.pdf</a></p>

I hope this information is useful. As ever, please do contact our Government Relations team at [memberscorrespondence@tfl.gov.uk](mailto:memberscorrespondence@tfl.gov.uk) should you have any further questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andy Lord', with a stylized flourish at the end.

**Andy Lord**