

## **Bus Services Act 2025: improving information about local services - GOV.UK**

### **Question 1: Have you ever used the existing registration database? If so, for what purpose(s) have you used it?**

Not to any significant degree, largely because it was too cumbersome to do so.

### **Question 2: Are there any features of the existing database you would like to see carried over into a new database?**

Where these features are currently available, Transport Focus would support their retention and enhancement within any new database as they promote transparency, consistency and ease of access to information about local bus services.

In particular, we would like to see:

- A single source of information on bus service registrations throughout England.
- Public access to service registration details and associated documentation.
- Search and filtering functions that allow users to identify services by operator, route, locality or registration number.
- Clear records of service variations and cancellations, including implementation dates.
- Downloadable data and open access arrangements that enable information to be reused by a wide range of users.

Any retained functionality should ultimately support passengers by making information about local bus services more accessible, transparent and easier to use.

### **Question 3: Is there anything you would improve about the existing database referenced in Q1? If so, please explain.**

While the existing database provides important information, it can be difficult for non-specialist users to navigate and understand. We would welcome improvements to search functionality, accessibility, integration with other bus data sources and the presentation of service changes. The key test for any new system should be whether it makes information about local bus services more transparent and useful for passengers. While a new system should seek to streamline and improve existing regulatory processes, it should also go beyond simply replicating existing processes in digital form to make information about local bus services more transparent, accessible and useful for passengers.

### **Question 4: Do you agree or disagree with fully digitising the registration, variation and cancellation process for local bus services, as well as including information about services which do not have to be registered with a traffic commissioner (franchised services and those running in an EP area with delegated registration) on a single system?**

Transport Focus agrees with full digitisation and believes it is crucial that information about local bus services operating under a franchise or in an area with delegated registration arrangements is included in the proposed digital system alongside conventionally registered services. This is because the dataset would otherwise be partial: it would not be possible to

understand how bus service provision has changed over time across England as a whole. Also, from a passenger information perspective, not requiring this information for all local bus services risks BODS having 'islands' without data.

Transport Focus encourages the Department to go further still. While not required to be 'registered', it is highly desirable that operators of non-local bus services and scheduled coach services are required to provide details of their timetable (including new services/journeys and variations to or withdrawal of services previously operated). This is needed to ensure that journey planners can provide passengers have complete and accurate information about the travel options available to them. There is also a case for requiring AVL data related to those services to be supplied to BODS in order that consumers and stakeholders have an understanding of how punctual and susceptible those services area.

**Question 5: Do you agree or disagree with making all of the information in question 4 publicly available on GOV.UK?**

We agree with making this information publicly available. This information can allow bus users to better understand the services provided in their local area. It can also help stimulate comparison and competition across regions on performance.

**Question 6: Do you agree or disagree with making the provision of information about services in EP areas with delegated registration and franchised services, also fully digitised?**

As per our answer to Question 4, Transport Focus believes it is vital that the same information requirements apply regardless of the operating model bus run under.

**Question 7: Do you agree or disagree with making the information provided by LTAs with delegated registration functions, and franchising LTAs, consistent with that provided by operators registering their services with the TCs?**

Transport Focus strongly agrees. Passengers' information requirements do not change simply because the operating model is different. Not requiring the same information also risks pockets of missing or inconsistent data across England as developers of information tools and applications would need to source data from multiple sources, if that data in fact exists elsewhere.

**~~Question 8: As outlined earlier in this document, the government intends to create a new data provision system, bringing together information about franchised services, services operating in enhanced partnerships where the registration function has been delegated to the LTA, and services registered with a traffic commissioner. This will be published online.~~**

**~~If you are an operator of bus services, a franchising authority, an authority exploring franchising, or are responding on behalf of an LTA with a delegated registration function, what would you like the new database to allow you to do? If you are not responding on behalf of these bodies, please continue to question 10.~~**

**Question 9: If you are a passenger, a bus data consumer, or an organisation which provides information to passenger, what would you like the new data provision system to allow you to access, and how?**

Passengers, organisations representing their interests, data consumers and other stakeholders should have easy access to open data on:

- service registrations, variations and cancellations, including implementation dates and the notice provided;
- routes, stopping patterns and scheduled journey times;
- real-time vehicle locations, cancellations, diversions and other service disruptions;
- fares, tickets and eligibility conditions, building on existing BODS requirements;
- punctuality, reliability and service performance;
- vehicle characteristics and facilities, including accessibility features, audio-visual information, emissions and fuel type;
- occupancy information, where available and reliable;
- contact information for operators and contracting authorities; and
- historical information that allows changes in local bus provision and performance to be understood over time.

Understanding how different passenger groups use services would support a fuller assessment of passengers' real-world experiences, including whether service failures disproportionately affect particular groups. The information should be provided through accessible, user-friendly interfaces for passengers, alongside downloadable datasets and well-documented application programming interfaces that allow data consumers to access and reuse it easily.

### **Using open data from BODS**

#### **Question 10: Have you ever used open data from the existing BODS? If so, for what purpose(s) have you used it?**

Transport Focus has recently become a consumer of BODS timetable schedule information and AVL feeds as part of establishing a Data Service to aid understanding of punctuality experienced by passengers.

We feel that the key features of BODS should be retained, particularly those that support journey planning and real-time passenger information. These capabilities underpin passenger-facing tools and applications, helping users to track services and make informed travel decisions. Continued provision of open data to enable punctuality and reliability to be calculated is also important.

#### **Question 11: Are there any features of the existing BODS you would like to see carried over to a new database?**

Transport Focus feels that all the existing features should be retained to facilitate provision of journey planning, real time passenger information and transparent reporting of punctuality performance.

#### **Question 12: Is there anything you would improve about the way open data are made available through the existing BODS? If so, please explain.**

- Simpler interfaces for non-specialist users.
- Improved presentation of accessibility information.

- Better publication of service cancellations, diversions and reliability information, potentially through the removal of the log-in requirement for ABODs allowing users to access the and utilise the data more simply.
- Clearer explanations of datasets and how they can be used.

**Question 13: One option for development of the new database is to publish the data contained within it via the existing BODS and link the 2 together, to create one source of information about local bus services across England outside London.**

We are broadly agnostic about the way in which it is achieved, so long as the following key objective is achieved. Namely, that it becomes impossible – because the two ends are driven by the same input – for a service to be legally ‘registered’ without corresponding timetable information being available in BODS. This is important to ensure that BODS timetable data is, at least as far as non-franchised services are concerned, 100% complete.

### **Records of registration**

**Question 14: If you are responding on behalf of a local transport authority (LTA) in an enhanced partnership (EP) area with a delegated registration function – in what format do you presently hold the information required under section 61 of the Transport Act 1985?**

**Question 15: If you are responding on behalf of a franchising authority, or an authority exploring franchising – do you already hold information about your services, similar or identical to that required under section 61, centrally? If, so in what format?**

### **Existing electronic bus service registration system (EBSR) and fully digitising registration, variation and cancellation**

**Question 16: Have you ever used the traffic commissioners’ EBSR system to register, vary or cancel a bus service? If so, are there any existing features or capabilities of EBSR that you’d like to see carried over to a fully digitised system?**

**Question 17: Is there anything that puts you off using the existing EBSR system?**

**Question 18: Is there anything you would improve about the existing EBSR? If so, please explain:**

**Question 19: If you currently use paper applications to vary, cancel or register a service, why do you choose this over EBSR?**

**Question 20: One option for the development of a fully digitised system used to populate the new database is to integrate it with the data submission process for the existing BODS and link the 2 together to create a single registration and BODS data submission journey for local bus services across England outside London.**

**If the government proceeds with this approach, do you think the existing BODS system is a good template on which to base the submission of data for the new database? Or would a new or different approach be favourable?**

**Question 21: What, in your opinion, would be the advantages of basing the submission of data for the new database on the existing BODS system and creating a single registration and BODS data submission journey?**

**Question 22: What, in your opinion, would be the drawbacks of basing the submission of data for the new database on the existing BODS system and creating a single registration and BODS data submission journey?**

**Question 23: For LTAs in EP areas with a delegated registration function, authorities exploring franchising or franchising authorities who could be required to input information about their services via a fully digitised system – do you foresee any barriers or issues with inputting registration, variation and cancellation information regarding your bus services onto a GOV.UK online portal like BODS or EBSR? Please describe.**

**Question 24: For operators of bus services who currently register, vary and cancel them with the traffic commissioners via the paper registration process – how much lead-in time do you anticipate you will require to move from paper to electronic registration, variation and cancellation applications?**

#### **Functionality of the fully digitised system**

**Question 25: What functionalities would you find most useful in a new GOV.UK portal? This can be with reference to either administering bus registrations, variations and cancellations, or navigating the new portal once it is available to access information about bus services.**

As an organisation working in the interests of passengers, we see two distinct sets of requirements for a new portal.

For passengers, passenger representatives and other stakeholders, the portal should provide:

- Search and filtering tools that allow services to be identified by route, operator, locality and service characteristics.
- Easy access to information on new services, timetable amendments and service withdrawals.
- Detailed accessibility information, with filtering options that allow users to identify services meeting specific needs.
- Historical records and graphical representations of changes in local bus provision over time.
- Clear information on service performance, reliability, cancellations and disruptions.

For organisations making use of bus data, including Transport Focus, the portal should provide:

- Downloadable datasets in open and reusable formats.
- Well-documented APIs that allow data to be accessed and integrated into external systems.
- Version histories and audit trails that support analysis, transparency and accountability.

The overall objective should be to ensure that information about local bus services is both easy for passengers to understand and use, and readily accessible for organisations undertaking analysis and monitoring on behalf of passengers.

### **Data transparency**

**Question 26: Do you agree with the general concept of increased data transparency around local bus services (going beyond existing initiatives)? Do you foresee any opportunities or challenges across any of the following areas:**

- **areas where passengers would benefit from additional information being openly available, such as likely occupancy, accessibility or environmental features (for example, to aid journey planning), as selected operators already provide in their apps**
- **areas where additional information being openly available would help monitor effective bus operation and local network performance or make analysis more meaningful**

Transport Focus supports greater transparency where it delivers passenger benefits and strengthens accountability. In particular, the information identified in our response to Question 9 should be made available in forms that passengers, passenger representatives and other stakeholders can understand and use.

Greater transparency would help passengers plan journeys with greater confidence, highlight areas where services require improvement and support independent analysis of network performance. Occupancy information could, for example, help passengers who cannot stand for long periods avoid particularly crowded services.

However, publication should be accompanied by clear explanations, consistent definitions and appropriate context. Making large volumes of data available will deliver limited benefit if users cannot interpret the information accurately.

**Question 27: DfT's view is that there could be greater transparency on the vehicles used to operate a local bus service (including their on-board facilities and technical specification), the type of service being operated, the costs of operating the services they run, the number of staff engaged in doing so, the distance travelled by vehicles, the number of journeys made and the number of passengers on services.**

**Additionally, it sees opportunities to aid journey planning through the surfacing of journey cancellations and diversions in real time to improve passenger confidence.**

**With reference to the list of data which we propose mandating operators to provide and which would be published by the department, is there specific data you think DfT should, or should not, be requiring operators to provide or make public?**

Transport Focus would support the Department requiring the following:

- Detailed information about accessibility features of a bus, sufficiently granular to allow a journey planner to be built for somebody with specific accessibility needs.
- Whether a bus has phone charging points and the type, wi-fi and other key facilities for passenger use.
- Real time cancellation information for two purposes: to support live departures information/journey planning and to generate performance statistics.
- Diversion information to support live departures and journey planning. The Department's goal should be a data-led solution to buses showing accurately on roadside RTPI systems, in online live departures information and in online journey planners. In particular, that buses do not show as 'on time' or available to catch from a particular stop when they will not serve that stop

We see merit in the Department requiring data showing whether a bus is diesel (and if so whether it is fitted with a Euro 5, 6, 7 etc. engine), BEV, a hybrid, runs on hydrogen or any other type of fuel.

**Question 28: Is there any data that you think DfT should require provision of (for example, to effectively enact its role as custodian of the bus sector), but not publish in the public domain?**

We are not convinced that data on operating costs, staffing levels and detailed passenger demand should routinely be published. While some of this information may be useful to DfT for oversight of the sector, public disclosure could be commercially sensitive and may not provide clear benefits for passengers. There is also a risk that individual routes or services are judged primarily on commercial metrics, rather than their wider social and connectivity benefits.

Any data that is published should be proportionate, aggregated where appropriate, and focused on helping passengers make informed travel decisions or understand how services are performing.

**Question 29: If data such as that listed in previous questions was required for additional reporting, at what frequency do you think DfT should require operators to provide updates?**

To be useful to passengers, any data required to support RTPI information at bus stops, in online live departures information and in online journey planners must be provided in 'real time'. There should be an expectation that changes in the characteristics of an individual bus (e.g. fitting of USB ports on refurbishment) should be updated promptly, perhaps within 7 days of entering service in its revised form. Any information gathered purely for retrospective reporting of performance in a particular field should be required on a quarterly basis. For avoidance of doubt, existing requirements to provide accurate timetable schedules and AVL data into BODS should remain.

**Question 30: If DfT were to pursue new regulations in this space, it would likely seek to require any additional data to be provided via the existing BODS. Do you foresee any potential benefits or challenges in requiring additional data to be provided and distributed via that service? Do you have a preferred method or format for certain data items to be provided by?**

Although it seems likely that a single source for all this type of information would be easier for data consumers than multiple sources, Transport Focus is broadly agnostic about the way in which it is achieved.

**Question 31: If DfT was seeking to enhance BODS in this way, it would have the opportunity to update the existing data reporting regime, including the existing technical specification. (For example, it could increase the frequency with which live automatic vehicle location data should be provided, to provide a smoother display of service movements on a map, or improve bus priority infrastructure, or require additional information to make linking of timetable, fare and location data easier to achieve.)**

**Are there any opportunities you think could come about as a result of these changes, or any challenges that could be addressed through them?**

Transport Focus's recent experience of consuming BODS timetable and real-time data to develop its own Data Service has identified a number of opportunities where changes to the technical specification could make the data considerably easier and more reliable to use.

A key principle should be that data consumers should not have to infer operational or lifecycle events from the absence of data. Additions, amendments, cancellations, expiries and temporary data failures should be represented explicitly wherever possible.

In particular, we would encourage the Department to consider:

- Explicit service cancellations and withdrawals. A service or journey disappearing from a timetable publication does not necessarily demonstrate that it has been cancelled; it may also result from an incomplete publication or data issue. Changes should therefore be represented explicitly, with an effective date and, where appropriate, a reason or change type.
- Structured same-day cancellation and disruption information. SIRI-VM provides vehicle activity and location information but does not itself provide a reliable indication that a scheduled journey, part-journey or service has been cancelled. Cancellation and disruption information should therefore be required in a structured form and made consistently available to consumers alongside timetable and AVL data.
- A consumer change mechanism for timetable and service data. Rather than requiring consumers repeatedly to download and compare complete datasets to determine what has changed, consideration should be given to a change API or similar mechanism identifying records which have been added, amended, superseded or withdrawn. Such a mechanism should allow recovery or replay following an outage.
- Stable identifiers. Durable identifiers are required to link services and journeys across registrations, timetable versions, real-time activity, fares and other datasets. This would make it considerably easier to integrate timetable, fares and performance information and analyse a service consistently over time.
- Versioned and complete publications. Consumers should be able to establish that a publication is complete before treating omissions from it as meaningful. Publications should therefore include appropriate version, timestamp and completion information so that a temporarily incomplete replacement cannot inadvertently be interpreted as withdrawal of services omitted from it.
- Improved freshness and data-quality metadata. Consumer interfaces should make clear when feeds were last successfully received and validated and should identify known coverage gaps, validation failures and significant publisher or BODS incidents.

- Clear technical change management. Changes to APIs, schemas and data standards should be versioned, documented and communicated sufficiently in advance. Machine-readable schemas, representative test data and an appropriate test environment would enable consumers to validate their systems before changes enter production.

These changes would make it considerably easier for consumers to distinguish genuine changes in bus service provision and operation from changes or failures in the underlying data supply. They would also support more reliable passenger information and journey planning, better measurement of accessibility and network performance, and stronger evidence for transport policy and funding decisions.

**Question 32: Through BODS DfT requires both UK-specific and particular international data standards to be used when data is provided. Noting that the international standards have evolved since the origins of BODS, are there any particular standards you would like DfT to consider if existing requirements are to be updated or additional data is to be required?**

**Question 33: For operators of bus services who currently report data via BODS – how much lead-in time do you anticipate you will require to accommodate any changes in data provision requirements?**

**Question 34: For operators of bus services who currently report data via BODS – what costs do you anticipate you would incur should additional data be required?**

**Question 35: For operators of bus services who currently report data via BODS – what tools or support would assist your business to meet any new requirements?**

**Question 36: For existing users of BODS data – what tools or support would assist your ability to make effective use of any new data?**