

Response to the Bus Services Act 2025 Consultation:

Improving information about local services

Intelligent Transport Systems UK

About Intelligent Transport Systems UK

Intelligent Transport Systems UK (ITS UK) is the national industry association for transport technology, representing a sector worth £3.2 billion, supporting 45,000 jobs and providing £500 million in tax revenue each year. We provide a national platform to support the roll out of technology for a cleaner, safer and more effective transport network, both at home and abroad.

ITS UK has 200+ members, from both the private and public sector, covering all sizes and disciplines, with members working in areas like smart ticketing, mobility as a service (MaaS), integrated transport, real time passenger information, public transport services, traffic management and enforcement, demand responsive transport, road user charging, connected and autonomous vehicles, and much more.

We would be happy to provide further information on the submission provided below. If this would be of use, please email ITS UK Public Affairs & PR Manager Eduardo Pitts, at eduardo.pitts@its-uk.org.

This Consultation response

ITS UK has sought to highlight a number of wider recommendations below for the improvement of the Bus Open Data Service (BODS), as part of our consultation response. The positions outlined below are a consolidation of ITS UK member views who interact with BODS as operators, technology professionals and public transport experts.

It is our members' view that BODS is a valuable and critical data service for the transport sector, but that the Department for Transport (DfT) could improve the completeness, accuracy, timeliness and operational validity of core data; ensure that passengers receive reliable and actionable information when journeys are disrupted; and support interoperability across modes, bus market structures and different nations. Delivery should be informed by evidence of passenger and data-consumer needs, accompanied by practical tools for smaller organisations, and governed by clear quality, version-control and assurance requirements.

Recommendations

1. DfT should establish measurable and enforceable data-quality standards for BODS that address completeness, accuracy, duplication, service withdrawals, and AVL availability and refresh frequency
2. BODS should provide clearer data states and better pre-publication controls.
3. BODS should support interoperable public-transport data across modes, geographies and operating models.
4. DfT should prioritise reforms on the basis of passenger needs.
5. The above recommendations should be delivered through a phased, evidence-led roadmap.



1. DfT should establish new measurable and enforceable data-quality standards for BODS that address completeness, accuracy, duplication, service withdrawals, and AVL availability and refresh frequency.

Although BODS has delivered significant benefits since its establishment, there are recurring problems with the quality and reliability of the data currently available through BODS. Information is reportedly frequently incomplete or missing key elements, despite requirements on operators to submit data. This can require journey-planning providers and other downstream users to supplement BODS with alternative data sources and to reconcile different datasets before they can present reliable information to passengers.

There are also reported instances of duplicate data and multiple overlapping calendars for the same route. This can make it difficult to establish which timetable version should be used and can require manual intervention. Critically, routes and trips may be removed in error, including cases where a service remains registered and is still shown as active by an operator or authority. In some cases, a route may appear to have no trips for an extended period, giving passengers an inaccurate impression that the service no longer operates.

The quality and reliability of data issue also applies to real-time information. Because automatic vehicle location (AVL) information is currently provided only when a vehicle departs from its schedule, when a service is cancelled before it departs, BODS does not provide an update. This leads to buses that never departed being displayed to passengers as running on time. To rectify this, we suggest a dispatch notification to identify buses are running and location positioning updates at every 30 seconds or less be included as an AVL requirement and BODS standard - even faster updates e.g. every 5 seconds, would allow for better applications of traffic light priority.

This would:

- Provide another measure to prevent cancelled services from being reported to be running on time.
- Aid the delivery of arrival notifications to the first stops near the start of a route.
- Make real-bus location mapping, where the vehicle position is plotted on a map accessible by users, significantly easier to deliver.
- Aid the opportunity to provide near-real-time route deviation events in the case of a short-term detour route being used because of an accident, or road maintenance etc.

A stronger quality framework should therefore include checks for incomplete records, duplicate submissions, overlapping calendars and unexpected service removals. It should also establish minimum standards for real-time data frequency and latency and make transparent the performance of datasets and providers against common quality measures. DfT could begin by identifying where location data improvements are most needed, by mapping performance of current location update rates by geographic area.

2. BODS should provide clearer data states and better pre-publication controls.

Operators should be able to prepare, validate and store network changes as drafts before they are released as live passenger information. At the moment, operators can upload intermediate versions of timetable changes while network alterations are still under development. Where these partial changes appear in the live service, they can create incomplete or unusual datasets and leave downstream users to determine whether the information should be displayed to passengers.

The reported presence of duplicate schedules, overlapping calendars and mistaken route withdrawals also indicates that data should be validated before it becomes live. BODS should distinguish between information that is being prepared, information that has been submitted, data that has been validated, data that is live, information that has been superseded and data that has been formally withdrawn.

This would reduce the likelihood that passengers receive information based on a temporary or incomplete dataset. It would also make the service more stable, particularly during periods of significant network change, and reduce the need for journey-planning providers to reconstruct or correct the information independently.

3. BODS should support interoperable public-transport data across modes, geographies and operating models.

Passenger journeys should not be constrained by institutional boundaries, differing standards or fragmented data arrangements. The current scope of mandatory data provision does not cover all public-transport modes in a consistent way. While commercial bus operators have BODS obligations, data provision by light rail and other modes can be less consistent. This creates avoidable gaps for multimodal journey planning, particularly where passengers need to combine bus with tram, rail, demand-responsive transport or active travel.

Standards should also be capable of representing the operational complexity of real networks. A route may have changing destinations or headways throughout a journey, particularly on circular, figure-of-eight or other complex services. Information systems should be able to communicate the relevant onward destination to passengers rather than retaining a single, potentially misleading destination description.

There is also a cross-border issue. BODS principally serves England, while Wales operates its own data service and Scotland may develop a separate approach. Passengers, however, do not distinguish between national systems when making a journey. There is therefore a strong case for structured cooperation between DfT, the devolved administrations, local transport authorities, operators, standards bodies and data consumers.

Guidance will also be needed as different bus-market structures coexist. Passengers do not need to understand whether a bus is franchised, commercially operated or part of an Enhanced Partnership. They need continuous and coherent information when travelling across network and authority boundaries.

4. DfT should prioritise reforms on the basis of passenger needs.

The central test should be whether BODS enables people to make, complete and re-plan journeys with confidence. Reliable information is fundamental to passenger trust. If users can see the full range of public-transport options and can rely on the accuracy of the information provided, they are more likely to use public transport, particularly where it provides a convenient alternative to private-car travel.

The greatest information need often arises when something goes wrong. Regular bus users travelling a familiar route may need little more than a dependable real-time prediction on a normal day. When the road is closed, a stop is suspended, a vehicle is cancelled, a diversion is in place or the planned alighting point cannot be served, however, the need for clear, accurate and practical information becomes much greater.

The future of BODS should therefore be shaped through direct engagement with downstream users and passengers, including disabled passengers, older people, women and girls, rural users, people making unfamiliar trips and those making cross-boundary journeys. It should also involve the organisations that transform raw data into journey planning, real-time information and accessibility tools.

Accessibility should be treated as a core outcome rather than an optional additional dataset. This includes information on wheelchair spaces, vehicle features, stop accessibility, disruption impacts

and whether an alternative journey is realistically usable. Passenger safety, particularly the safety of women and girls, should also be considered in the design of information services.

While information around caution, crowding and capacity delivered through AI offer great value, inaccurate information presented with confidence can undermine trust. Any use of automated or AI-enabled systems should be subject to assurance on accuracy, transparency, privacy and the handling of uncertainty working well first.

5. The above recommendations should be delivered through a phased, evidence-led roadmap.

There is a legitimate question about which elements of BODS are currently most widely used and where investment would produce the greatest benefit. DfT should strengthen core data quality and delivery capability while implementing priority enhancements such as reliable real-time operational data and interoperability in a phased, tested and proportionate way.

This response has outlined the strong cases for substantive improvements in data quality and reliability; pre-publication functions; interoperability of modes, markets and nations; and placing passenger and downstream users at the heart of reform. However, reform should not be implemented as a series of isolated technical changes without considering the stability and functionality of the service as a whole. Changes to one area of BODS could introduce further instability if existing functionality is not complete, reliable and widely used. DfT should therefore establish which elements of BODS are delivering the greatest passenger benefit, where it is weakest, and which existing approaches represent good practice before introducing additional obligations.

This is particularly important for smaller operators and authorities. New requirements on data quality, real-time updates, dispatch information or interoperability will only improve passenger outcomes if organisations have affordable tools, technical guidance, testing environments and implementation support. A phased approach would allow DfT to improve core data reliability first, establish effective delivery models and scale more advanced requirements across the sector.