

Thursday 1 May 2025

Simon Lightwood MP
Parliamentary Under-Secretary of State for Local Transport
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

RE: Protecting Community Transport, Children, Young People and Teachers

Dear Mr Lightwood,

On behalf of the Community Transport Association (CTA), I write to express our concern over renewed calls, based on a tragic fatal accident from 1993, to prevent schools from operating minibuses under the trusted Section 19 permit regime. While well-intentioned, such a change would risk dismantling a proven and community-led approach to safe school transport with serious unintended consequences.

I would like to set out our position on this matter of fundamental importance to the UK's Community Transport sector and the millions of passengers who rely on its services.

As you know, CTA leads a thriving Community Transport movement across the UK. We are a charity, a membership organisation, and the largest designated body for issuing Section 19 permits. We promote excellence and the highest of standards through our national programme of quality-assured education and training for Community Transport drivers, the Minibus Driver Awareness Scheme (MiDAS), to ensure that organisations deliver safe, legal and comfortable journeys.^[1] We have more than 1,300 members in England, Scotland, Wales and Northern Ireland, who largely rely on Section 19 permits to deliver a diversity of transport projects and services on a non-profit basis.

We strongly believe in evidence-based public policy. There is only very limited evidence that minibuses pose a particular or significant threat to passenger safety. In 2023, there were 3 fatal and 62 serious collisions involving minibuses representing 0.11% and 0.15% respectively of a total of 2,667 fatal and 40,622 serious collisions involving all vehicles throughout Great Britain.^[2] Moreover, the number of fatal and serious collisions involving minibuses fell by 45% in 2023 compared to the ten previous years, a greater decrease than collisions involving any vehicle type other than motorcycles under 50cc and ridden horses.^[3]

Indeed, minibus collision data is frequently bracketed with collisions involving other vehicles, due to the very small numbers involved.

Therefore, preventing schools or educational bodies from operating minibuses with Section 19 permits, would be unnecessary, disproportionate and damaging - given the Community Transport sector's excellent safety record, steadfast commitment to the highest standards, and positive contribution to our society.

This is not to detract from the seriousness of those collisions that do take place, but to highlight that the very small numbers involved mean that efforts to improve passenger safety should proceed from a careful examination of accident records and 'near miss' information to identify priorities for effective intervention.

We propose that a better solution to improve passenger safety and connectivity would be for the Department for Transport (DfT), as part of the forthcoming Road Safety Strategy, to work with schools and the wider Community Transport sector to increase the supply of accredited, qualified drivers at the same time as raising safety standards in line with 'Vision Zero principles'. As you know from your previous discussions with CTA, we believe that this can be achieved by driver licensing reform to grant D1 licence entitlements to B licence holders with MiDAS as the new mandatory standard.^[4]

CTA, as a designated body, will revoke Section 19 permits, in conjunction with the Office of the Traffic Commissioner, should our members be found to fail to meet their obligations or operate properly. This is rare in the Community Transport sector, but we do not hesitate to do so to maintain compliance and ensure passenger safety.

Since 1993, there have been four significant changes which have contributed to higher levels of safety and lower incidences of accident and injury:

1. The law was changed in 1997 to require seatbelts to be fitted on all minibuses and to outlaw the 'crew bus', a minibus in which two opposing benches face towards each other. This eliminated two significant sources of risk to passenger safety, which had been cited by the inquest into the 1993 accident. The Community Transport sector was instrumental in calling for and subsequently implementing these changes in the law.
2. The design of minibuses more broadly has improved as new models and technologies have been introduced to the market. New and improved active and passive safety features, like Advanced Driver-Assistance Systems (ADAS) using sensors, camera and driver monitoring devices, have further improved passenger safety and wider rollout will continue to deliver safety gains.^[5]

3. The driver licensing and enforcement regime has been repeatedly strengthened over the last three decades, with more rigorous testing, more professional instructing, revisions to the Highway Code and tougher penalties for breaking the rules.
4. Since its launch in 1994, MiDAS has been driving up safety standards among minibus drivers, including teachers. MiDAS is the nationally recognised gold standard for the assessment and training of over 20,000 minibus drivers and passenger assistants every year, equipping them with the skills and knowledge they need to provide safe, legal and comfortable journeys to passengers.

MiDAS was developed by the Community Transport sector, for the Community Transport sector, as a meaningful contribution to improving safety. The MiDAS standard has been recognised and trusted for more than 30 years. The content and delivery of the training has been successfully modernised in line with best practice, expert advice and lived experience to ensure it is of the highest quality and fit for purpose for the 21st century. Schools and educational bodies now represent 21% of MiDAS trainers, 58% of MiDAS learners, and 57% of MiDAS organisations, demonstrating that they take their responsibilities to pupil safety and teacher welfare seriously.

Three-quarters of our members are charities, community groups or social enterprises, with half providing group vehicle hire to local schools and groups, while 13% are schools or educational bodies.^[6] Section 19 permits enable our members to help children and young people take part in learning, social and sporting opportunities, from trips and excursions to competitions and clubs, which develop their skills, build their confidence, expand their horizons and boost their physical and mental health and wellbeing. It is an essential enabler of activities, services and support for children and young people every day in every corner of our country.

Requiring schools and educational bodies to operate under the O-Licensing regime would considerably increase the barriers and costs facing schools, restricting the life chances of children and young people with no benefits for safety. All staff would require a full D1 licence with those who passed acquired their driving licence after 1 January 1997 not automatically holders of one. The minimum cost of a D1 licence is £1,000. Staff would have to be absent from teaching for at least three days to complete their training. The availability of drivers in schools and the number of journeys by schools would inevitably fall dramatically, as would, therefore, the number of children and young people travelling to visit museums, compete in sport and enjoy nature.

We welcome the opportunity to work in partnership with you and your officials to ensure that safety and access go hand in hand. We look forward to working together to protect and support our Community Transport operators, our children and young people and our teachers.

Yours sincerely,



Dr Victoria Armstrong
Chief Executive Officer
Community Transport Association

victoria@ctauk.org

^[1] www.ctauk.org/training

^[2] Table ras0502, unadjusted collision totals: www.gov.uk/government/statistical-data-sets/reported-road-accidents-vehicles-and-casualties-tables-for-great-britain

^[3] Table ras0502, figures adjusted by DfT to account for changes in accident reporting:
www.gov.uk/government/statistical-data-sets/reported-road-accidents-vehicles-and-casualties-tables-for-great-britain

^[4] www.ctauk.org/tackling-driver-shortages-d1-campaign

^[5] Masello et al (2022) 'On the road safety benefits of advanced driver assistance systems in different driving contexts', *Transportation Research Interdisciplinary Perspectives*, Vol 15:
www.sciencedirect.com/science/article/pii/S2590198222001300

^[6] www.ctauk.org/sites/default/files/2024-09/CTA-Mapping-England-Report-2024.pdf