

# GUIDELINES FOR THE USE OF SEAT BELTS ON SCHOOL BUSES



TASK FORCE ON  
SCHOOL BUS SAFETY

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## **INTRODUCTION**

School buses have an excellent safety record in Canada and are the safest way to transport children to and from school, more so than any other means of transportation. Even with this excellent safety record, there is room for improvement. As part of a comprehensive review of school bus safety both inside and outside the bus presented in the [Strengthening School Bus Safety in Canada](#) (2020) report, the Task Force on School Bus Safety acknowledged that three-point seat belts on school buses, when installed correctly and worn properly, can offer an additional layer of safety, particularly in the context of collisions involving rollover, side-impact, or vertical lift scenarios.

In order to maximize the level of protection afforded by seat belts on school buses, this document offers a set of guidelines for school bus owners/operators and school boards that have installed seat belts on school buses. The Guidelines take into consideration the complex set of operational considerations and risk factors relevant to developing and enforcing effective seat belt protocols.

### **Purpose**

This document is intended to clarify roles and responsibilities in the context of school bus seat belt safety; outline operational challenges for consideration; and provide a framework to help mitigate the risks associated with the improper use of seat belts on school buses. The guidelines introduced in this document are for consideration and are meant to support school bus operators operating school buses equipped with seat belts within their fleet as they endeavour to ensure that all passengers always wear seat belts correctly.

Provinces and territories enforce safety on Canada's roads and highways and set the rules of the road. They are also responsible for the licensing of school bus drivers as well as policies for safe operation of school buses, including the proper use of seat belts. Any requirements from a province or territory will apply separately from any consideration outlined in this voluntary guideline and must be followed within that jurisdiction. As such, it is imperative to consider the specific jurisdictional context alongside these guidelines when developing seat belt protocols.

### **Scope of the Guidelines**

The guidelines seek to inform the development and implementation of school bus seat belt programs across Canada and serve to reinforce the importance of partnerships between school administrators, bus companies, drivers, parents, and children in the implementation of such programs. This document will remain evergreen and will be updated based on best practices and lessons learned as the use of seat belts on school buses continues to evolve both within Canada and abroad.

These guidelines do not include technical specifications or requirements for the installation of three-point seat belts on school buses. Transport Canada regulates the installation of seat belts on school buses as part of the Motor Vehicle Safety Regulations (MVSR) under Canada Motor Vehicle Safety Standards (CMVSS) 222 – School Bus Seating and Crash Protection.

## Background

School buses have an exceptional safety record in Canada. That is because school buses are built – inside and out – to protect children. They are painted a distinctive shade of yellow and are equipped with flashing red lights and a stop arm designed to help children get on and off the bus safely. Governed by some 40 federal regulations<sup>1</sup> and a robust set of standards, school buses also have a series of structural safety features built in that are specifically designed to safeguard children in the event of a collision. For example, they are mandated to have reinforced joints, high roof crush standards, electronic stability control to help prevent rollovers, window retention to mitigate ejection, emergency exit requirements, and a highly effective seat design referred to as compartmentalization.

Three-point seat belts offer an additional layer of safety on school buses, particularly in the context of collisions involving rollover, side-impact, or vertical lift scenarios, provided they are installed properly and worn properly by all occupants. A July 2018 regulatory requirement<sup>2</sup>, which came into effect as of September 2020, governs how seatbelts are installed on school buses. As a result, should seat belts be installed on school buses, they must be installed according to the regulatory requirement. At present, such installation remains optional in recognition of the strong safety record of school buses and the numerous financial and practical considerations associated with the installation and use of seat belts (e.g., consequences of misuse).

On January 21, 2019, the FPT Council of Ministers Responsible for Transportation and Highway Safety established an expert Task Force on School Bus Safety, comprised of FPT governments and the full range of school bus safety stakeholders. The Task Force is responsible for identifying and assessing potential measures to further improve school bus safety in Canada, with an emphasis on seat belts, thereby supporting FPT Transport Ministers in establishing a cohesive pan-Canadian approach to the issue of school bus safety.

### *Roles and Responsibilities*

School bus safety is a shared responsibility. Federal and provincial or territorial governments, school boards, and school bus operators each play a role in making sure our school buses are safe. The “yellow school bus” design familiar to Canadians is unique to Canada and to the United States, with federally defined school bus classes and specific safety regulations. In both countries, standards committees comprised of industry and government officials working together (e.g., CSA D250 Committee on School Bus Construction Standards) develop further technical specifications for the safety and durability of school buses.

Transport Canada is responsible for establishing regulations and setting safety equipment requirements in the Canada Motor Vehicle Safety Standards, including specific safety requirements for buses, such as brake systems, window retention to help prevent passengers from being ejected in the event of a rollover collision, and electronic stability control, a technology

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<sup>1</sup> Transport Canada, Safety standards for school buses, <https://tc.canada.ca/en/road-transportation/school-bus-safety/safety-standards-school-buses>

<sup>2</sup> Canada Gazette, Part II, Volume 152, Number 14, <https://canadagazette.gc.ca/rp-pr/p2/2018/2018-07-11/html/sor-dors143-2-eng.html>

mandated by Transport Canada in June 2017 to reduce the risk of rollovers on school buses and other vehicles. Similar to other classes of vehicles, school buses are also required to meet stringent requirements for lighting, tires, wheels, and other safety equipment. Transport Canada works with all orders of government to keep these standards up to date and performs tests to ensure compliance.

As set out in the *Motor Vehicle Safety Act*, manufacturers are responsible for certifying that their vehicles, including school buses, are designed and constructed in accordance with federal safety requirements.

Provinces and territories are responsible for the enforcement of safety on Canada's roads and highways. They prescribe driver and vehicle licensing requirements and rules of the road, such as seat belt use and speed limits, and enforce the Canadian Standards Association (CSA) D250 school bus standard, which complements federal requirements (e.g., bus colour, crossing arm).

School bus owners/operators and school boards (together with provinces and territories) who have seat belts installed on their school buses are ultimately responsible for ensuring that effective protocols are in place to mitigate these issues.

### *Operational Considerations*

Three-point seat belts offer an additional layer of safety on school buses, particularly in the context of collisions involving rollover, side-impact, or vertical lift scenarios, provided they are installed properly and worn properly by all occupants. Seat belts, if used improperly, could have a negative impact on overall safety, and therefore, the installation and use of seat belts on school buses should be considered in a manner that does not compromise the safety provided by existing school bus occupant protection features and does not encourage the adoption of less safe modes of transportation.

With some school buses carrying up to 84 children, there are a number of important considerations relative to seat belts which need to be addressed in the development and implementation of school bus seat belt programs. For example:

- seatbelt adjustment relative to the size of child;
- winter clothing and its impact on proper seat belt use;
- misuse, compounded by children moving around in their seats or unbuckling; and
- unfastening in emergency exit situations.

School bus safety is a shared responsibility that involves school boards, school bus operators, drivers, teachers, parents, school children, communities across the country, and all road users. The framework outlined below aims to provide everyone involved in ensuring school bus safety with a model for their consideration, as they develop their own protocols to mitigate these operational concerns.

## **FRAMEWORK FOR THE USE OF SEAT BELTS ON SCHOOL BUSES**

Provinces and territories enforce safety on Canada's roads and highways and set the rules of the road, which includes the use of seat belts. In establishing effective protocols and within the context of their jurisdiction, school bus operators and their partners in the transportation of school children may consider the guidance in the following four parts when operating a school bus equipped with seat belts:

1. Proper Use of Seat Belts
2. Education and Awareness
3. Driver Training
4. Monitoring and Enforcement

Taken together, they provide a comprehensive approach that can continue to adapt to changing circumstances and advances in related technology. A checklist for consideration is provided for reference in Annex A.

### **1. Proper Use of Seat Belts**

To ensure that seat belts are always worn correctly and provide maximum protection to all passengers, school bus seat belt programs should consider the following requirements (a sample user guide can be found in Annex B):

- Remove backpacks, which must not be worn with seat belts, and place them on the student's lap.
- Position the seat belt as close to the body as possible.
- Check that there is no slack or twisting in the straps.
- Ensure that the shoulder belt goes across the shoulder and not the neck.
- Place the lap belt as low as possible from hip bone to hip bone, not over the stomach.
- Keep seat belts for individual use and never put the seat belt around two or more people.
- Depending on the size of the child, consider the use of an appropriate child restraint system or integrated child seat, in accordance with relevant provincial/territorial regulations.
- When using a child restraint system or integrated child seat in cold weather, bulky coats and snowsuits make it difficult to properly tighten the harness. Parents should be encouraged to dress children in thin, warm layers to ensure that the harness or seat belt of a child restraint system or integrated child seat maintains a snug fit along the proper belt paths.<sup>3</sup>

<sup>3</sup> *Child Passenger Safety Technician Training Manual*, Child Passenger Safety Association of Canada (2016)

## 2. Education and Awareness

Studies show<sup>4</sup> that compartmentalization is highly effective in protecting school bus passengers in rear and frontal collisions but offer less protection for passengers who experience a side-impact collision, a rollover, or vertical lift scenario. While seat belts on school buses can provide an extra layer of safety, school children need to be taught how to always use seat belts correctly while on the school bus. In addition, partnerships between parents, drivers, bus companies, and school administrators are critical to reinforce the importance of proper seat belt use. The following is a list of measures for promoting good habits of seat belt wearing on school buses:

- Deliver school bus seat belt safety lessons for students using video clips and role play to reinforce important messages on an annual (minimum) basis. As part of these lessons, consider including what to do if passengers discover a functionality issue with a seat belt. Such training should occur at the start of the school year to ensure students understand their responsibility in following the seat belt requirements.
- Employ trained staff to visit schools and carry out seat belt and safety training on board school buses on an annual (minimum) basis.
- Incorporate proper unbuckling procedures into existing emergency exit training considerations, along with awareness and use of emergency seat belt cutters, as applicable.
- Support parents with this new responsibility in encouraging proper seat belt use by hosting a parent information session and/or distribute information letters to parents outlining proper use procedures and how to communicate with their children about the importance of always wearing seat belts correctly while on the school bus (Guidelines and images outlining how to wear a seat belt safely can be found in Annex B).
- Display a seat belt user information guide within the school bus (e.g., signage, decals).

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<sup>4</sup> Transport Canada, School Bus Safety Publications, <https://tc.canada.ca/en/road-transportation/school-bus-safety/school-bus-safety-publications>

### 3. Driver Training

School bus drivers can play an important role in reinforcing the correct use of seat belts. If properly implemented, school bus seat belts have the potential to improve passenger behaviour while minimizing distractions to drivers. To maximize these and other proven benefits, drivers must be trained on how to support students with correct seat belt use and adjustment, as well as monitoring and enforcement procedures. For reference, guidelines for driver training is provided in Annex C. Specifically, it is recommended that school bus drivers remind students to wear seat belts at three time periods:

1. **Morning:** as students board the bus, remind school children to wear their seat belts.
2. **En Route:** if it becomes apparent that a student has unbuckled their seat belt or refuses to wear one while in transit, provide a verbal warning or written citation (see Monitoring and Enforcement).
3. **Afternoon:** before departing the school, conduct a visual inspection of every seat to ensure all students have their seat belt on.

Additionally, to support passengers with seat belt use, it is recommended that drivers ensure seat belts are untangled and untwisted prior to the start of each trip. While doing so, drivers could also visually inspect seat belts for potential functionality issues. If not already included, operators may consider including a requirement for thorough verification of seat belt functionality periodically as part of mandatory bus maintenance inspections.

The driver recommendations outlined above could be supported by a dedicated bus monitor or adult volunteer. If support personnel are employed to support the driver, it is recommended that they receive the same seat belt-related training and instruction as drivers.

Bus drivers must also be familiar with the procedures to safely handle emergencies in accordance with the policies of their company and school board, and any requirements of the province or territory where they operate. Drivers are expected to:

1. Identify the emergency (fire, motor vehicle collision, etc.) to assess the need for evacuation, with due consideration for the type of vehicle and presence of special needs passengers.
2. Initiate emergency response plan as per their training in accordance with their local jurisdiction.
3. Identify appropriate vehicle exits to evacuate passengers using the exit(s) furthest from the apparent hazards, according to the nature of the emergency.
4. Help any passengers that have been unable to unbuckle on their own, if necessary, with the use of a seat belt cutter. Buses equipped with seat belts may carry these cutters for use in case of emergencies. Drivers operating school buses with seat belts should be familiar with how to properly use seat belt cutters.
5. Direct passengers to leave backpacks and personal items on the bus, and to gather in a safe location away from hazards. Prevent injuries by stressing the importance of an orderly evacuation.



#### 4. Monitoring and Enforcement

To ensure that children are properly secured and using their seat belts correctly, school bus operators may wish to consider implementing the following measures:

- Spot checks conducted in partnership with local and provincial police authorities.
- Random inspections by school administrative staff, including principals and teachers.
- Use of adult or student volunteers on school buses to assist with monitoring.
- Implementation of a “buddy system” between peers to encourage the use of seat belts.
- Seat assignments so that more vulnerable students (e.g., younger students or those with a history of misconduct) are closer to the front of the bus and easier to monitor.
- Employment of a dedicated seat belt monitor to accompany each school bus and assist with monitoring and enforcement while in transit (in addition to the driver).
- Technological methods for detecting proper use (e.g., installation of seat belt reminder/alert systems).

In instances where a student either chooses to misuse or not use the seat belt, school bus drivers or monitors, as appropriate, should be responsible for issuing a verbal warning or written citation consistent with existing misconduct policies. From there, school administrators, including principals and teaching staff, should address student misconduct on school buses in accordance with student behaviour management policies already in place. Recognizing that approaches to addressing student misconduct can vary significantly across schools and jurisdictions, the following best practices can be used as a guide to assist with the enforcement of seat belts and student accountability on school buses:

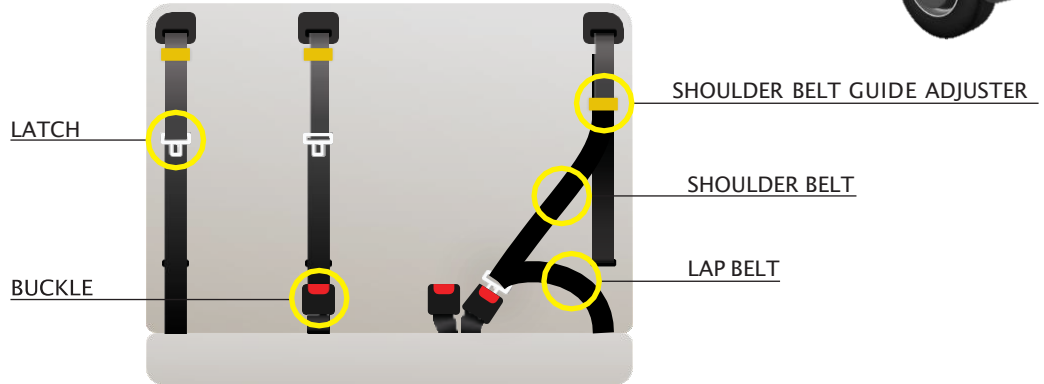
- In instances where students forgot to put on the seat belt, they are issued a verbal warning/reminder.
- Should a student refuse to properly wear their seat belt, the driver or monitor, as appropriate, will provide a written account of the incident that can then be used by school administrators and parents to correct behaviour.
- In order to hold students accountable for misconduct and prioritize student safety, school administrative staff should enforce consequences that are in line with school disciplinary policies.

**ANNEX A: CHECKLIST OF CONSIDERATIONS FOR THE DEVELOPMENT OF SCHOOL BUS SEAT BELT PROTOCOLS**

Category	Recommended Protocols	Desired Outcomes
Proper Use of Seat Belts	<ul style="list-style-type: none"> <li><input type="checkbox"/> Ensure backpacks are closed and content is contained.</li> <li><input type="checkbox"/> Remove backpacks and place them on the student’s lap.</li> <li><input type="checkbox"/> Position the seat belt as close to the body as possible.</li> <li><input type="checkbox"/> Check that there is no slack or twisting in the straps.</li> <li><input type="checkbox"/> Ensure that the shoulder belt goes across the shoulder and not the neck.</li> <li><input type="checkbox"/> Place the lap belt as low as possible from hip bone to hip bone, not over the stomach.</li> <li><input type="checkbox"/> Keep seat belts for individual use and never put the seat belt around two or more people.</li> <li><input type="checkbox"/> Depending on the size of the child, consider the use of an appropriate child restraint system in accordance with relevant provincial/territorial regulations.</li> <li><input type="checkbox"/> When using a child restraint system or integrated child seat in cold weather, parents should be encouraged to dress children in thin, warm layers to ensure that the harness or seat belt of a child restraint system or integrated child seat maintains a snug fit along the proper belt paths.</li> </ul>	<p>Seat belts are always worn correctly by all passengers.</p>
Education and Awareness	<ul style="list-style-type: none"> <li><input type="checkbox"/> Deliver school bus seat belt safety lessons for students using video clips and role play to reinforce important messages on an annual (minimum) basis. Such training should occur at the start of the school year.</li> <li><input type="checkbox"/> Employ trained staff to visit schools and carry out seat belt and safety training on board school buses on an annual (minimum) basis.</li> <li><input type="checkbox"/> Incorporate proper unbuckling procedures into existing emergency exit training considerations, along with awareness and use of emergency seat belt cutters, as applicable.</li> <li><input type="checkbox"/> Support parents with this new responsibility in encouraging proper seat belt use by hosting a parent information session and/or distribute information letters to parents outlining proper use procedures and how to communicate with their children about the importance of always wearing a seat belt while on the school bus.</li> <li><input type="checkbox"/> Display a seat belt user information guide within the school bus (e.g., signage, decals).</li> </ul>	<p>All students are fully trained to use school bus seat belts and understand the consequences of misconduct.</p> <p>Strong partnerships between parents, drivers, bus companies, and school administrators to reinforce the importance of proper seat belt use.</p> <p>Incorporation of regular school bus seat belt training and awareness programs at all schools serviced by school buses with seat belts.</p> <p>User information guides distributed to parents and students and displayed within every school bus equipped with seat belts in a manner that is visible to all students (e.g., signage visible when seated).</p>

<p>Driver Training</p>	<p>It is recommended that school bus drivers or monitors, as appropriate, be responsible for reminding students to wear seat belts at three time periods:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Morning: as students board the bus, remind school children to wear their seat belts.</li> <li><input type="checkbox"/> En Route: provide a verbal warning or written citation (see Monitoring section) if it becomes apparent that a student has unbuckled their seat belt or refuses to wear one while in transit.</li> <li><input type="checkbox"/> Afternoon: before departing the school, conduct a visual inspection of every seat to ensure all students have their seat belt on.</li> </ul> <p>It is recommended that drivers ensure seat belts are untwisted and untangled before each trip. While doing so, the driver should also visually inspect seat belts for potential functionality issues.</p> <p>It is also recommended that school bus drivers be familiar with the procedures to safely handle emergencies, including the use of seat belt cutters.</p>	<p>Improved passenger behaviour and decrease in driver distractions.</p> <p>Positive reinforcement for the proper use of seat belts by all passengers at all times.</p> <p>Safe and effective evacuations in the event of emergencies.</p>
<p>Monitoring and Enforcement</p>	<p>Recommended protocols for <u>monitoring</u> proper seat belt use:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Spot checks conducted in partnership with local and provincial police authorities.</li> <li><input type="checkbox"/> Random inspections by school administrative staff, including principals and teachers.</li> <li><input type="checkbox"/> Use of adult or student volunteers on school buses to assist with monitoring.</li> <li><input type="checkbox"/> Implementation of a “buddy system” between peers to encourage the use of seat belts.</li> <li><input type="checkbox"/> Seat assignments so that more vulnerable students (e.g., younger students or those with a history of misconduct) are closer to the front of the bus and easier to monitor.</li> <li><input type="checkbox"/> As appropriate, employment of a dedicated seat belt monitor to accompany each school bus and assist with monitoring and enforcement while in transit (in addition to the driver).</li> <li><input type="checkbox"/> Technological methods for detecting proper use (e.g., installation of seat belt reminder systems).</li> </ul> <p>Recommended protocols for <u>enforcing</u> proper seat belt use:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> In instances where students forgot to put on the seat belt, issue a verbal warning/reminder.</li> <li><input type="checkbox"/> Should a student refuse to properly wear their seat belt, the driver or monitor will provide a written account of the incident that can then be used by school administrators and parents to correct behaviour.</li> <li><input type="checkbox"/> To hold students accountable for misconduct and prioritize student safety, school administrative staff should enforce consequences that are in line with school disciplinary policies.</li> </ul>	<p>Decrease in the number of students found to be using seat belts improperly (e.g., decrease in the number of verbal warnings and written citations).</p> <p>Increased support for bus drivers to complement their monitoring and enforcement requirements.</p> <p>Mutual understanding between students, parents, drivers, and school administrators regarding the consistent enforcement of consequences of misconduct.</p>

# Annex B: How to Wear Your Seat Belt Safely on a School Bus



## DO THIS

### BUCKLE UP

Sit flat against the seat back.



Pull the seat belt out. Insert the latch into the buckle and listen for the click.

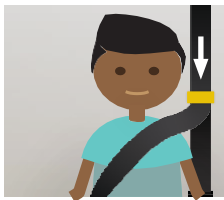


To make sure you're buckled up, pull the seat belt latch.

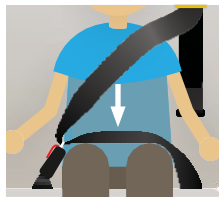


### ADJUST

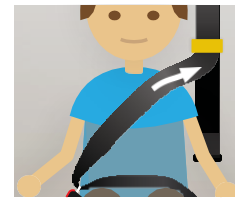
Move the shoulder belt so it lays against your shoulder. Make sure it isn't twisted.



Move the lap belt to fit snugly on your hips (below your belly).



To tighten the belt, gently tug at your shoulders or above.



If you're wearing bulky winter clothing, put the lap belt underneath your jacket. Make sure it sits tightly on your hips.

### UNBUCKLE

When it's time to exit the bus, undo your seat belt buckle. Push the button on the buckle and remove the latch.



Let the shoulder belt move back into the upper part of the seat.



# How to Wear Your Seat Belt Safely on a School Bus



## DON'T DO THIS

Never sit in front of the lap or shoulder belt.



Never let the seat belt twist. It should lay flat against your body.



Never put the shoulder belt behind your back, wearing only the lap belt.



Never put your seat belt latch into the buckle for the seat beside you.



Never put the shoulder belt under your arm.



Never wear your backpack when you're seated in the bus.



Never wear your seat belt loosely.



Never sit on the edge of your seat.



# Annex C: Seat Belts on School Buses – Safety Guidelines for Drivers



**TO ENSURE A SAFE BUS RIDE EVERY TIME, IT IS RECOMMENDED THAT YOU:**

- ❖ **Support a seatbelt safety culture** on your school bus.
- ❖ **Offer verbal instructions** to students on board.
- ❖ **Reinforce wearing seatbelts** properly.

Support a seat belt safety culture	Offer verbal instructions	Reinforce using seat belts
<p><b>Here are some ideas:</b></p> <ul style="list-style-type: none"> <li>• Do regular visual inspections to ensure students are wearing their seat belts.</li> <li>• Praise students for wearing their seat belt. Be positive and supportive.</li> <li>• Use a buddy system. Students can help their buddy remember to wear their seat belt. Quiz students on seat belt safety. Make it fun.</li> <li>• Use seat assignments.</li> <li>• Remind students that you'll be doing seat belt spot checks.</li> <li>• When a student doesn't follow the rules, address their behaviour with existing policies. Give a warning or citation.</li> </ul>	<p><b>Friendly reminders to students could be:</b></p> <ul style="list-style-type: none"> <li>• "Remember, your seat belt should be as close to your body as possible."</li> <li>• "Is your strap snug to your chest? Make sure it's not twisted."</li> <li>• "Shoulder belts go across shoulders, not necks."</li> <li>• "Is your lap belt low? It should go from hip to hip, not over your belly."</li> <li>• "Please take off your backpack while you're seated."</li> </ul>	<p><b>For example:</b></p> <ul style="list-style-type: none"> <li>• Morning: As students board the bus, remind them to wear their seat belts.</li> <li>• En route: Give a warning or written citation if a student unbuckles their seat belt.</li> <li>• Afternoon: Before you leave the school, check every seat to be sure each student is wearing their seat belt.</li> </ul>