

**Isolated Children's Parents' Association of Western Australia Inc.**



## **Submission**

to the

**Public Accounts Committee**

into the

**Student Transport Assistance Policy framework**

from the

**State Council**

of the

**Isolated Children's Parents' Association of Australia Inc.**

**October 2021**

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The Isolated Children’s Parents’ Association of Western Australia, ICPA (WA), welcomes the opportunity to contribute to the *Student Transport Assistance Policy (STAP) framework* review providing feedback related specifically to transport needs of rural and remote children to access an appropriate education.

Since the last review in 1998-1999 the composition of rural and remote communities has seen a most notable reduction in population. It is important that the STAP reflects these changes in order to continue providing students living in remote or rural areas of the State with transport assistance to attend school.

### ELIGIBILITY CRITERIA

The current eligibility criteria for a rural ‘orange’ school bus service is very clinical and rigid in its application and has outcomes that cause frustration and anxiety within rural communities. Section 3.3 Operational Principles stating:

*“...Student Transport Assistance Policy will be applied in a manner that is reasonable, equitable and aims to meet the needs of individual communities.”*

**Nearest appropriate school.** The criteria of ‘students must be enrolled at their *nearest appropriate school*’ is most often the nearest school, however this does not take into account the reality of rural families and community connections.

Populations in rural communities are diminishing and farm landholdings are increasing, often spanning more than one Shire. This can result in families from the same farming business being given two different eligibility classifications on school bus transport to attend the same school; one family being eligible the other family complimentary.

#### EXAMPLE 1:

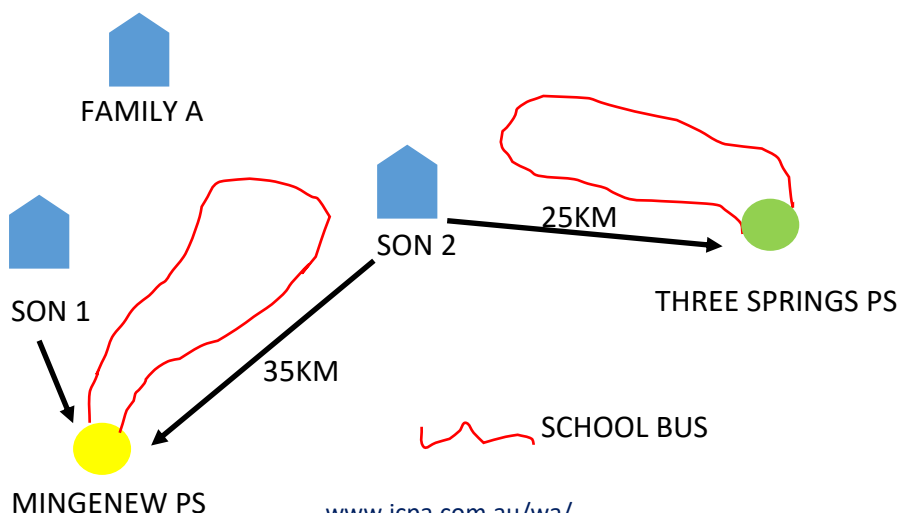
Family A live near Mingenew, their children attended Mingenew Primary School, and the family is heavily involved in the Mingenew Community.

Son number 1 marries and moves into a house on the family farm and his children attend Mingenew Primary School (his nearest appropriate school).

The family purchase a neighbouring property.

Son number 2 and his wife move into the house on the new farm. However, this place of residence is closer to Three Springs Primary School than Mingenew Primary School, however son number 2 continues to be involved with the Mingenew community.

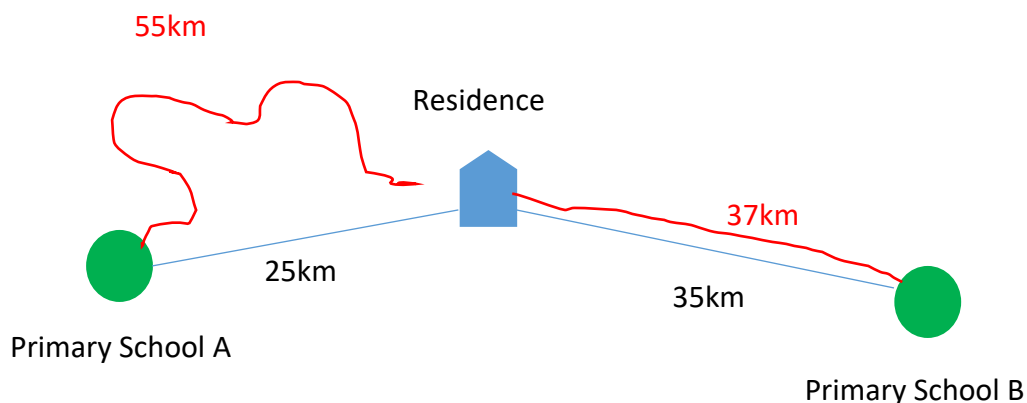
In attending Mingenew Primary School the children of son number 1 are considered eligible for school bus transport, but the children of son number 2 are only complimentary. Should the bus become full son number 2 has to choose between changing schools or driving his children to school every day, so as not to disrupt their schooling. Son number 2 is willing to drive to meet an existing bus route.



Rural schools suffer as community populations decline with decreasing enrolments. It is important for the health and viability of our rural schools and communities that families are attracted to rural areas. The cost and ease of access to education is an increasingly vital consideration for families when contemplating relocating to a new rural community. Rural schools are often competing for student attendance at their schools and access to transport assistance to a school can be a determining factor.

There are situations where families live closer to School A than School B however, the school bus route to access School B is closer in distance travelled than the bus route travelled to School A. This student is not considered an eligible passenger entitled to travel on a bus to School B; School B is not the *nearest appropriate school*. The student may be permitted to travel to School B as a complimentary passenger.

EXAMPLE 2:

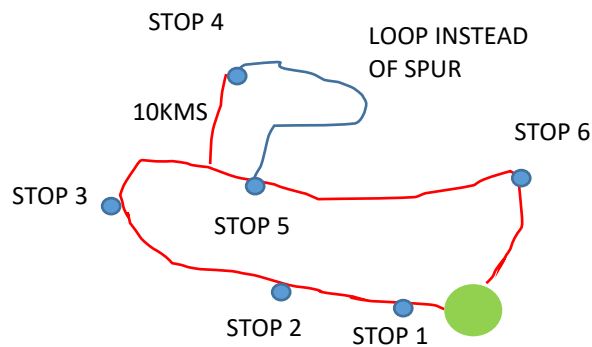


Families within the metropolitan area have a number of schools from which they may choose to send their children. Access to all schools, both non-government and government, is not inhibited by the transport options or assistance available to families. However, transport assistance for families in rural and remote areas is limited by the *nearest appropriate school* policy, irrespective of any other factors.

Rural families do not have the same choice with regards to their children's education. Their choice is often dictated by the ability to access transport assistance. Transport assistance for **school of choice** would have a positive impact on families, rural schools and communities by offering educational options that align with their community connections. The combination of any school bus route and the use of the conveyance allowance could aid parents in being able to access transport assistance irrespective of their school of choice.

**Access to Spurs.** Access to a spur is often a return trip on the same road; but also provides a means for families to access a school bus route without the requirement of the bus traversing a greater distance to collect only a small number of children. The allowable distance of a permitted spur needs to be flexible and should be considered in relation to the whole bus route; especially if the spur does not cause the route to exceed the 90 minute maximum route travel time and the potential savings in overall distance travelled, as opposed to being a fixed distance for a specified number of children. Such flexibility may aid in ensuring a bus route continues.

### EXAMPLE 3:



In Example 3 the spur to Stop 4 is 10kms which exceeds the maximum distance of 7.5kms as per the current STAP. In reality it would be shorter to add Stop 4 as a spur then continue to Stop 5, than introducing a loop that does not pick up any additional children.

### TYPES OF TRANSPORT ASSISTANCE AND ENTITLEMENTS

The inclusion of students enrolled in kindergarten being entitled to transport assistance, subject to meeting the eligibility criteria that apply to all rural students, has been most welcomed. The willingness to extend a route (based on the spur rule) to enable families of kindergarten students to receive a closer bus service was also well received.

**Orange School Buses.** The current orange school bus transport assistance is a comprehensive system that enables many children from rural and remote areas to access school. The issue of eligible and complimentary passengers adds a level of complexity to what could be a very straight forward process, and potentially has a large impact on the decision families are making regarding the educational choices for their children.

**Conveyance Allowance.** It is acknowledged that logistically it is not possible for every child to be collected from their front gate and that many families either have to travel to the nearest bus stop or transport their children to school. For those who are able to have a school bus stop at the front gate there is no cost in transporting their children to school. However, for those who are required to travel, and receive a conveyance allowance, the cost can be considerable. The conveyance allowance received per kilometre is quite insignificant compared to the actual costs incurred by families. While it is accepted that the conveyance allowance is not intended to cover the full costs of owning and operating a vehicle, the current conveyance allowance rate and its link to the Consumer Price Index (CPI) does not reflect the massive increase in costs families are experiencing. The cost of fuel has increased exponentially along with the increase cost of vehicle repairs and maintenance.

**Complimentary passengers.** Rural areas are experiencing population decline and when a family leaves a rural area the changes to the demographics can have a major impact on a bus route. As the number of children on a bus route diminishes so too does the economic viability of that route. Unfortunately, when assessing bus routes and the number of students on a bus, only eligible students are taken into consideration, when in fact that same bus could have a number of complimentary passengers. If these complimentary passengers were taken into consideration, or the issue of eligible or complimentary passengers did not exist, bus routes that are perceived to be unviable could actually prove to be viable.

Such situations cause a great deal of uncertainty, stress and anxiety to parents as families that previously received transport assistance are faced with having no transport assistance for their children to continue accessing that same school, if that school bus route is deemed unviable.

**EXAMPLE 4:**

Parents in the Munglinup community were emailed informing them the school's two bus routes were under review due to low student numbers. After widespread community outrage SBS sent an update that the services would be amalgamated in 2022 based on the current passenger numbers. A PTA spokesperson said, "one route was to carry only one eligible student in 2022". However, this did not take into account the number of students who actually want to use the service but are only deemed complimentary.

If the criteria of complimentary passengers remains, consideration should be given for 'grandfathering' provisions whereby a child and their siblings retain their right to remain on a bus route until such time as they finish at that school, unless an alternative route to the same school is provided. The same situation arises when a bus becomes full and the complimentary passenger is required to vacate their position on the bus. If the student was considered an eligible passenger and the bus becomes full, either a larger bus would be provided or an adjustment made to school bus routes in the area.

**REGULARITY OF USE**

Continuity is an important factor in the deliverance of a school bus system. The requirement of regularity of use assists with bus routes remaining consistent in terms of timetabling. There are occasions when if a particular student is not on the school bus on a given day, that the timings of the bus route are dramatically affected. This has an affect on parents planning for the collection of their own child from a bus stop. Rural families often plan their activities and availability around school bus timetables and when changes are made, especially at short notice, families are sometimes not in a position to be at the bus stop earlier. There are always occasions when such alterations to the timetables cannot be avoided, however it is important that students utilising the bus routes do so regularly, unless adequate prior notice is given.

**EQUIDISTANCE**

Where equidistance occurs (if the distance variance between the two schools, in relation to a student's residence, is less than or equal to 2.5km) School Bus Services (SBS) will only offer transport assistance to one school, is normally established by the closest bus route to the student's residence. (Example 4 in the current STAP, the diagram does not reflect the wording of the student's situation as stated in the example). If access to transport assistant is available for **school of choice**, the requirement for equidistance rulings and debate on whether 2.5km is a suitable distance for equidistance to be considered would be irrelevant.

**EXAMPLE 5:**

Family A live on the family farm near Munglinup and their son has been attending Munglinup Primary School for the past two (2) years. The family is very active in the local Munglinup community belonging to many community groups including the Munglinup Fire Brigade, Munglinup Community Group, Munglinup CWA, Munglinup Mothers Groups and Treasurer for the Munglinup P&C. The family have been denied a position on the school bus service as an eligible passenger because they live 3kms closer to Jerdacuttup and SBS consider that to be the 'appropriate school'. This family misses out on the equidistance rule by 0.5km. The current bus to Jerdacuttup is full which would require the family to drive their children to and from school each day. The mother would have to give up her part time nursing job in Munglinup which would be detrimental to the Munglinup community.

## **SAFETY**

Safety is paramount when transport assistance is provided to promote access to education. The safety of the students and the bus drivers/operators is equally important. The STAP is comprehensive in its behaviour management guidelines and code of conduct. It clearly addresses the roles and responsibilities of students, parents/carers, bus contractors and the Public Transport Authority (PTA). The STAP contains explicit details and advice on dealing with incidents of misbehaviour and the relevant recourse. However, the STAP lacks any guidance in relation to breaches by bus drivers/operators.

## **COMPLAINTS PROCEDURE**

Within the current STAP there are no details in relation to the avenue for parents should they have any concerns regarding the safety of their children, breaches of the code of conduct or operational guidelines by bus contractors or drivers. There is no complaint avenue. There are no guidelines detailing the point of contact to raise concerns or breaches and no procedural guidelines or ramifications of breaches. Rural communities are close knit environments with bus drivers being local members of the community. If issues arise there needs to be a defined process to maintain a balanced procedure.

### **EXAMPLE 6:**

A bus driver failed to notify parents they were going to be early in the afternoon and drop a student at their bus stop. The student was six (6) years old and it was raining. When the driver was questioned he told the child to 'just run quickly'.

### **EXAMPLE 7:**

A school bus has experienced maintenance and breakdown issues including blown tyres, flat battery, lack of preparedness for school commencement and ongoing issues with the bus door not closing correctly. Parents were being requested to close the door when students were being put on the bus.

### **EXAMPLE 8:**

A severe lack of cleanliness of the bus, both inside and out with poor visibility out of the windows due to lack of cleaning.

### **EXAMPLE 9:**

A contractor is using an older bus as the regular school bus was either being serviced or was broken down. This bus had no seatbelts for students and no ability to safely fit booster seats for younger students.

### **EXAMPLE 10:**

Following a two-week trial to change the bus route the contractor extended the route unbeknown to SBS. The distance of the school bus route was changed from 95km taking 85 minutes, of which 40% was on unsealed roads, to 112km in 81 minutes with 56% on unsealed roads. This would mean the school bus is travelling an average in excess of 80kms per hour.

## **ASSESSMENT PROCESS OF BUS STOPS AND ROUTES**

The assessment process of bus stops and bus routes appears to be calculated utilising the precise location of students from their transport assistance application and looking at mapping data, without any consultation and knowledge gained by local people, such as School Principals.

The Department of Education (DoE) formally withdrew its support in the administration for transport assistance and deemed the School Bus Advisory Committee (SBAC) was no longer required. Within

rural communities there is a general consensus that the removal of the involvement of School Principals and the DoE withdrawal of support in the administration for transport assistance has caused an element of disconnect between families, the DoE and SBS. Although the government policies on transport assistance is intended to promote a system that is equitably across the State, in reality what is achievable and what mapping data indicates can be quite different in its outcomes.

Some schools or communities have continued with SBACs. Although the SBAC act in an advisory role to SBS, without the previous administrative support of the DoE many committees feel their voices are left unheard and their advisory role to SBS is not recognised. There is no proactive relationship between SBS and SBACs, the only communication appears to occur when a SBAC approaches SBS when issues arise. Do SBS maintain a register detailing schools that continue to operate a SBAC?

The local knowledge and experience of School Principals is invaluable when assessing road distances and suitability for a bus route and bus stop. Maps are an inefficient way of determining suitable roads and routes as they do not take into account road surfaces and conditions. Many roads, especially gravel, become adversely affected by weather events often resulting in the road becoming impassible for extended periods of time or unsafe to travel on at normal speeds. This can be problematic, especially when bus routes are already at the maximum 90 minute journey time. For safety reasons drivers need to slow down this may result in children being late for school. These are factors that need to be taken into account when planning the length and location of a school bus route.

Parents felt they had a connection to the school bus system through their local school and many local areas had school bus committees that dealt with any issues that arose and provided an avenue for a suitable resolution. Parents are now confused as to the process to be followed should there be issues regarding the school bus, the school bus driver, the school bus contractor or the bus route.

When considering bus routes and any amendments, consulting school bus operators can lead to a biased view of what is the best route. School bus operators (contractors) are operating a business and naturally it is in their best interest to have the most financially lucrative bus route possible.

### **BUS ROUTE MAPS**

The availability of school bus route maps on the SBS website, similar to those available on the Public Transport Authority (PTA) site for Transperth buses, would be an extremely useful tool for families. Families of students, and prospective students to an area, would be able to determine each applicable school bus route and the implications for their family. When considering relocation to rural areas for employment families can be better informed when making decisions about their place of employment, where they may choose to live and their children's education. Additionally, creating a link to the bus route maps on the DoE website would be a beneficial reference point.

### **CONSULTATION AND COMMUNICATION**

Within the current STAP the process of reviewing either a single service route or an area review of multiple service routes will be conducted in an open and transparent way. From experience this does not happen effectively. SBACs are no longer consulted prior to proposed changes being communicated and affected parties are most certainly not provided with an opportunity to discuss their concerns. For communities to be told that school bus routes are to be changed or removed, and for families themselves to determine the impact on their travel assistance, causes immense anxiety and concern.



**EXAMPLE 11:**

The Hyden Primary School Bus Committee (HPSBC) were informed early in 2021 that the entire Northern Hyden Corridor may be without a school bus as of the end of Term 2 2021 due to current low student numbers. This was extremely concerning to those families currently utilising the service and would also negatively impact the community.

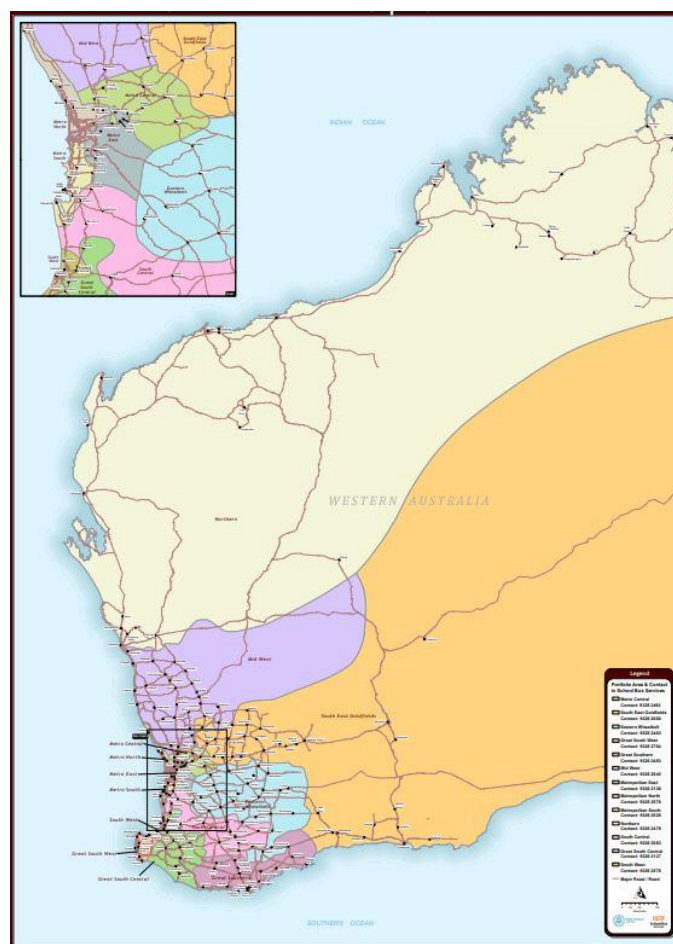
Prior to the announcement there had been no consultation or contact with the School Bus Committee, the school or the parents affected. As a result of the concerns the HPSBC compiled a list of all eligible students for the next four (4) years (2021-2024 inclusive) and devised four (4) amended bus routes and forwarded this information to SBS.

**CONTRACTUAL ARRANGEMENTS WITH SERVICE PROVIDERS**

The current STAP makes no reference to the contractual arrangements with service providers. Contractual arrangements need the ability for current bus route direction and distance to be adjusted throughout the duration of the contract should changes to circumstances arise.

**RESOURCING OF THE SCHOOL BUS DIVISION WITH THE PTA**

The SBS division manages transport assistance for thousands of school students across the State. There are thirteen (13) Contract Officers in charge of school buses. Of these thirteen (13), nine (9) have operational responsibility for regional area portfolios.



A perception of a lack of resources exists with a key point being an absence of understanding of the logistics pertaining to particular localities and bus routes.



DoE formally withdrew the roll of 'Coordinating School Principal' in 2011. Consequently, from the start of 2013 Coordinating Principals ceased to exist to undertake operational school bus issues. Coordinating Principals had the local knowledge, the ability to travel school bus routes and to assess the viability of adding another school bus stop to an existing route or determine if alternative arrangements needed to be made to the existing local bus routes. Coordinating Principals have valuable information at the coal face of operations and ensures continuity of knowledge in rural areas. Many rural schools suffer from revolving Principal syndrome and without a formal Coordinating Principal arrangement intimate local knowledge is lost.

The area of responsibility for each of the nine (9) Contract Officers is vast and issues and concerns can vary immensely within the one area. There is no correlation between the areas of responsibility for school bus Contract Officers and Education Regional and Local Offices. The current STAP 9.9.8 states,

*“Educational Regional Offices are involved in ....defining school catchment areas..”*

In defining school catchment areas consideration needs be given to the availability of, and eligibility for, transport assistance. How can there be a cohesive understanding of the potential travel assistance required if there is no correlation between the Educational Offices and school bus Contract Officers? An Education Regional Office or Education Local Office has a much a better understanding of the make-up of their locality and its requirements.

#### EXAMPLE 12:

Borden Primary School bus services portfolio is the responsibility of the Eastern Wheatbelt Contract Officer, but the relevant Education Regional Office is located within the South West, which is the responsibility of a different Contract Officer (South West Contract Officer).

The School Bus Services division within the PTA is under resourced given the vastness of the State and the distribution of resourcing would be more affective if there was an alignment between Contract Officer’s areas of responsibility and Education Regional/Local Offices.

#### **OTHER COMMENTS**

The current STAP 5.4.4 refers to other sources of student transport assistance that the PTA is not involved in administrating, these schemes are managed by the Department of Transport (DoT) and are not related to Student Transport Assistance Policies.

It is interesting to note that within the STAP information relating to a Road Travel Subsidy it states, *“A Road Travel Subsidy may be payable for students who need to travel more than 56km to the closer of:*

- *The nearest appropriate government school with boarding facilities offering classes in the grade or year in which the students are enrolled; or*
- *The nearest regular passenger transport or school bus service operating between the student's home and school.”*

However, in its application under the Student Travel Subsidy Scheme (STSS) – Road Travel Subsidy (RTS) reference is made to a transport hub; it is not a requirement that the transport hub operates between the student’s home and school.

Many families have had their application for a RTS rejected because they are closer than 56km to a transport hub, which does not travel to their nearest appropriate school; in fact most travel in the totally opposite direction. It is the major influencing factor in applications being rejected.

A meeting with On-demand Transport confirmed that if the service is timetabled it is classed as a regular service. **It does not matter how frequent the service operates, it does not matter if that service goes to the nearest public school and it does not matter if it goes in the totally opposite direction;** it is still classified as a transport hub for establishing eligibility criteria for the STSS-RTS.

In previous correspondence with the Hon. Rita Saffioti, MLA, Minister for Transport, the following questions were asked:

It would be appreciated if you can please explain the following:

- How can it be equitable that to be eligible for the Road Travel Subsidy there is absolutely no correlation between the closest appropriate government school with boarding facilities and transport to get to that school?
- What is the purpose of the Road Travel Subsidy (RTS) if the eligibility criteria is based on the proximity of government services, such as public transport, if the transport service does not go to the nearest school to where a family lives? The nearest appropriate government school to a family home is the benchmark by which many allowances are based and yet according to Ms Jeffrey it is not a consideration for the RTS.
- What is the purpose of the RTS if it is not assisting children who live more than 56km from their nearest appropriate government school, with no public transport, to access that school?
- How can it be considered equitable in using the proximity to a transport service as a means of rejecting an application if that transport service goes in the completely opposite direction?

All correspondence has been met with one of the following standard replies:

*“To ensure a transparent, consistent and equitable application of the RTS, eligibility for road travel support is based on the proximity of government provided services, such as public transport or schools. It is designed to support families who live a considerable distance from those government provided services and not necessarily to support the distance travelled to reach a particular school.”*

*“To ensure a transparent, consistent and equitable application of the RTS, eligibility for road travel support is based on the proximity of government provided services, such as public transport or schools, as opposed to whether a transport service goes to the school nearest to where a family lives, or the school the family chooses to send their child/children.”*

*“Eligibility for the Road Travel Subsidy (RTS) is based on the proximity of government provided services, such as public transport or schools, to the relevant family home. Transport services travelling to the nearest government school is not a consideration when assessing eligibility as students are not required to attend the nearest government school and may choose to attend educational institutions elsewhere. Similarly, families are not required to utilise the nearest transport service and may choose to drive children to and from school, regardless of public transport availability.”*

It is unfathomable that given one of the objectives of the Student Travel Subsidy Scheme Policy is,

*“to alleviate the difficulties associated with access to secondary/tertiary education related transport in regional and remote Western Australia,”*

that applications are being rejected based on transport hub proximity irrespective of whether a service is being offered by that transport hub to alleviate the difficulties associated with access to secondary/tertiary education. In being assessed as part of the eligibility criteria the transport hub should at the very least travel to the student's nearest appropriate government school.

There is certainly nothing equitable when the distance to the nearest government school with boarding facilities is further than 56km from the family home, there is no transport service to that educational facility but there is a transport hub within 56km that travels elsewhere, which results in the RTS being rejected.

EXAMPLE 13:

FAMILY A live in Hyden, the nearest high school - Narrogin Senior High School (SHS) is 190km away. The daughter attends Narrogin SHS and boards at Narrogin Residential College.

*“Road Travel Subsidy claimed rejected due to proximity of a TransWA transport hub in Hyden that travels between Perth and Esperance (nowhere near Narrogin) on a Tuesday.”*

How is this equitable? The family are sending their daughter to the nearest appropriate government school with boarding facilities, which is further than 56km from the family home, with no public transport to that facility. The family are denied the STSS-RTS because there is a bus route that travels between Perth and Esperance!

FAMILY B live 20km east of Corrigin, the nearest high school for Year 11 or Year 12 is Narrogin SHS 116km away. The nearest transport hub is in Corrigin. The service from Corrigin travels to Perth, there is no direct service to Narrogin. The reason for the application being rejected was:

*“Please be advised as there is a bus service less than 56kms, which is an essential part of the assessment, there is no Road Travel Subsidy allowance applicable. I understand that the school year your child attends is not available in Corrigin, however the nearest bus service, is less than 56kms. With our assessment to be eligible, you need to reside more than 56kms from the nearest Government Boarding facility or Regular Passenger Transport Service. We therefore pay the allowance to the closest facility/ transport hub whichever comes first. To be able to claim the allowance, you must live more than 56kms and each kilometre after, you will be paid rate of \$0.2038 per kilometre.”*

In this case, they are further than 56km from Narrogin SHS yet are deemed ineligible for the STSS-RTS because they are only 20km from the transport hub in Corrigin that travels to Perth. The bus service does not travel to the closest appropriate government boarding facility at Narrogin, it goes to Perth, the opposite direction.

FAMILY C live in Kulin, the nearest high school Narrogin SHS is 115km away.

When this member enquired why her application had been rejected, she was advised:

*“That if she looked at a TransWA map that she could get her child from Kulin to Narrogin.”*

Technically this is correct, but it would involve two different bus routes and may take a day and a half to make the journey.

There are many more examples of families who have had their application for transport assistance rejected due to their proximity to a transport hub that does not service their nearest high school with boarding facilities.

## **CONCLUSION**

ICPA (WA) are grateful for the opportunity to contribute to the review into the Student Travel Assistance Policy (STAP) framework. The examples within this submission have been provided by our membership base as a result of issues raised with WA State Council. These issues have formed motions that have been presented at our State Conference over a number of years that then become part of our advocacy policy.

ICPA (WA) continues to promote across all components of our advocacy for equitable access to educational opportunities for rural and remote students. Often in rural areas of this State transport assistance underpins the ability for students to access their education programs. The overarching provisions within the current STAP are a good starting base, however rulings regarding eligible and complimentary passengers, the changing dynamics of rural schools and rural communities, and avenues of recourse for parent's concerns need to be addressed.