

Submission to the Public Accounts Committee inquiry into the School Transport Assistance Policy (STAP) framework from Great Southern Grammar

This submission to the inquiry will address the following terms of reference:

- a) the eligibility criteria for students to qualify for transport assistance, including:
 - i. nearest appropriate school;
 - ii. access to spurs; and
 - iii. inclusion of social, community, and economic and financial factors;
- b) the types of transport assistance and entitlements to be provided to ensure students can undertake an appropriate education;
- c) the relevance of existing policies, practices and rules that are applied in delivering the transport assistance arrangements;

Context

Great Southern Grammar (GSG) is an independent, non-denominational Christian school on the south coast of Western Australia. Students are drawn from the local area and all over the Great Southern and beyond. This submission relates more closely to students who reside in towns such as Cranbrook, Frankland, Mt Barker and towns in a similar area, with those students using the School Bus Service (SBS) to access education at GSG.

Parents choose an education at GSG based on a non-denominational Christian ethos, school values and siblings already attending the school, all of which are unique to GSG. In addition, the school offers courses in many year levels and co-curricular offerings not available at other schools in the area. For example, the school offers STEM (Science, Technology, Engineering and Mathematics), Languages, Agriculture, Specialist Mathematics, Physics, Literature and other courses not available at other local schools. In addition, GSG offers an instrumental music program not available in other schools. Families choose this school over others in the region for many different reasons, some of them listed above.

There are two other independent schools in the area to which this submission will refer, Bethel Christian School and Australian Christian College. The points made in this submission are in no way intended to denigrate these schools but simply point out the differences in education which may impact parent decisions about where their children are educated.

Key issues

Some children enrolled at GSG have been unable to access SBS transport to GSG as there have been no complimentary passenger places on the bus from Mt Barker to GSG. This has jeopardised the students' attendance at GSG as they cannot access transport to the school. In response to requests to provide transport, SBS offers transport to the nearest 'appropriate' school. This appears to suggest that students should attend an alternative independent school as the bus service is not available to GSG.

Families have been advised that as there are no places on the bus from Mt Barker to GSG their children will be provided transport to the nearest 'appropriate' school, which the SBS has determined to be Bethel Christian School. There is no connecting bus service from Bethel to GSG. This would appear to mean the SBS is determining an 'appropriate' school for families rather than allowing families a choice of school for their child/ren. Bethel Christian School is not non-denominational in Christian ethos, nor does it offer the breadth of curriculum available at GSG. The

schools are approximately 5km from one another. GSG is not the only local independent school to be impacted by the application of the policy, Australian Christian College (ACC) informed us they had a similar issue for numbers of their families. ACC is located between GSG and Bethel and families from ACC were also told their children could be transported to Bethel Christian School.

In examples collected by the school, families who have one or two children already attending GSG are unable to access the SBS to transport the second or third child to GSG. The SBS has suggested in correspondence to families that the child not yet attending GSG would be provided transport only to Bethel Christian School as the nearest 'appropriate' school. Again, this would appear that the access to transport is determining which school a child can attend.

We would assert that the application of the policy is fundamentally flawed in determining access to the SBS for students choosing to attend independent schools. We would argue that parents, rather than the SBS, should be making the determination on a 'appropriate' school for their children. Further, we would argue that children who have siblings already attending a school should have access to the SBS to allow them to attend the same school.

Evidence

Refer to relevant research, laws, policies or findings. The committee wants to be informed by expert opinion.

The *Student transport assistance policy and operational guidelines* refers to providing 'reasonable' access to a school.

The policy states:

3.2 The Government's Policy Objectives

The Government's policy objectives in providing Transport Assistance to Rural Students and students attending Education Support Facilities are:

- To ensure that Eligible Students have reasonable access to school;
- To provide Transport Assistance to Eligible Students to enable them to attend their nearest government or non-government school offering an appropriate year or level of study and which is of an appropriate religious denomination or ethos to the student (with special consideration being given to the needs and capacities of students attending Education Support Facilities);
- To ensure that the Transport Assistance provided to students is appropriate, safe, cost-effective and fair; and
- To ensure that school bus contractors provide safe and high quality services to Eligible Students.

We suggest that the application of the policy to the reality of students' transport requirements does not meet the policy objectives. We have had families denied access to the school bus service direct to GSG (the school the child is enrolled in) on the basis of there being 'no place on the bus'. However, students are offered a space on a bus to an alternative school within 12km of GSG. This appears to privilege enrolments in an independent school which happens to be built on a major transport route, in this case, Bethel Christian School.

Further, 'reasonable' access to school should include the opportunity for students to be transported to a school regional families may choose as the school they prefer to send their child to, which aligns with their values and religious affiliation and provides for the needs of their children and access the SBS. As the policy suggests "offering an *appropriate year or level of study and which is of an*

appropriate religious denomination or ethos to the student”. Regional families should not be denied the opportunity to send their child to their preferred school, which aligns with their religious denomination and ethos, based on access to transport.

The Education Act enshrines the right of parents to choose a school for their child and this policy appears to be in contravention of the spirit of the Act in this regard.

Case studies

Include examples of how you, your organisation or your clients are affected by the issue. The committee wants to know about the human side of a policy and its effects (you may want to consider removing identifying information).

Following the enrolment of their child at GSG and application for SBS, parents have been informed that there is no place on the SBS. This information is being presented as late as mid-January before the school year starts. Parents are understandably concerned at this response. Examples of correspondence we have received from families on the SBS includes comments such as:

“Our son finally has a spot on the Bus to Grammar. He is on one bus to xxx then changes bus to Grammar. In the letter it states that it is a complimentary seat that can be taken away if someone else needs the spot. Not sure how that will go but he is on the bus for now”

“I am so devastated to have just received news that xxxx’s application for the bus was unsuccessful. Apparently, they have changed their eligibility criteria!!!”

“We rang bus people to try and get xxx on other bus so he can buddy up... stressed me out big time that he is not part of a group and only 10 years old!! but it was a clear no. I hear there will be a review of buses in Albany so this will definitely be a thing! I too find it frustrating as it clearly states in the letter ‘a reasonable level of transport assistance to the nearest appropriate Government school, or non-Government school of religious denomination or ethos, that offers the year of study for the student.” And it is THEIR interpretation of religious domination or ethos”

One family received this response (excerpt from letter from SBS):

Application for Transport Assistance

Thank you for your Application for Transport Assistance lodged with School Bus Services. Your application has been assessed in accordance with the policy criteria shown below.

Under current Government policy, to be eligible for Transport Assistance, a rural student attending a mainstream school must, under normal circumstances:

- Be enrolled at their nearest appropriate school,
- Reside outside of a designated Public Transport Area,
- Be enrolled in a pre-compulsory or compulsory education period,
- Regularly use the approved school bus to attend their school and,
- Reside more than 4.5 km from their school.

It has been determined that your application does not meet the eligibility criteria and therefore is ineligible for Transport Assistance. Specifically, xxx is not attending his closest Christian School which is Bethel Christian College.

Unfortunately the bus is at full capacity and xxxx has been placed on the waiting list. We will contact you should a seat become available.’

This correspondence does not include reference to the policy objective of the bus service to ‘enable them [students] to attend their nearest government or non-government school offering an *appropriate year or level of study and which is of an appropriate religious denomination or ethos to the student.*’

Initially, when GSG tried to support families in their requests for re-consideration for eligibility to access the SBS we received the same feedback from SBS as families.

It was not until families approached their local Federal member, and GSG subsequently approached the same local member and Association for Independent Schools (AISWA) who petitioned both the Minister for Transport, Rita Saffioti and the Minister for Education, Sue Ellery, that a solution was offered. After these petitions, families were granted access to the bus service. It may have been coincidence, but it appeared at that point that transport could be provided to students to their preferred school, if enough political pressure was applied. This letter (excerpt below) was received by one family on 4 February, following the start of the school year:

“SCHOOL BUS SERVICE TO GREAT SOUTHERN GRAMMAR

Thank you for your email dated 9 January 2020 requesting the provision of additional school bus services to enable students to attend Great Southern Grammar. The Minister for Transport, the Hon Rita Saffioti MLA has asked me to respond.

As mentioned in previous correspondence, the current Student Transport Assistance Policy provides for a reasonable level of transport assistance to the nearest appropriate Government school, or non-Government school of religious denomination or ethos, that offers the year of study for the student.

To be eligible for transport assistance, students must meet all of the following criteria:

- Be enrolled at their nearest appropriate school;
- Be enrolled in a pre-compulsory or compulsory education period;
- Regularly use the school bus;
- Reside more than 4.5km from their school; and
- Reside outside a designated Public Transport Area.

Based on the abovementioned criteria, the nearest appropriate school for your son xxxx is Bethel Christian College.

The level of education and curricula offered at individual schools is the province of the Department of Education and the various independent school organisations, and has no bearing when determining transport assistance eligibility.

The Public Transport Authority (PTA) is funded to provide orange school bus services to transport eligible students to their nearest appropriate school. Where a family selects a school of choice (not the nearest appropriate school), access to an orange school bus will only be granted where there is spare capacity. Students who travel under these arrangements are assessed as ‘complimentary’ passengers and their seat on the bus can be removed at any time if it is required by an eligible student.

When school buses are at capacity, complimentary students are waitlisted and will be granted access only if a seat becomes available in the future. Any growth in the orange school bus network is therefore based on the growth in the number of eligible students not complimentary students.

In this respect, the PTA has advised that it will be adding an additional Class A (Coaster sized) vehicle for the start of the 2020 school year from Mount Barker to Albany to transport eligible TAFE students to Albany as part of their Notice of Arrangement schooling.

As a result, I am pleased to advise that there will be capacity to carry additional

complimentary students in the short to medium term, but this does not imply a long term guarantee. I understand the PTA has advised you that xxx was given access to the Yakamia Willyung Service as a complimentary passenger for the start of the school year.”

What is problematic about this response is both the determination of an ‘appropriate’ Christian school (the Christian ethos at each school is very different) and that Department of Transport and the Department of Education appear not to be working in consultation to support regional families. In addition, the uncertainty of a temporary arrangement for transport is deeply problematic.

Recommendations

Try to identify possible solutions. The committee wants to know what can be done to address a problem. Provide a brief summary and a contents list, if your submission is lengthy and includes several recommendations.

Recommendation 1: Review bus run to cater for Great Southern Grammar students from areas outside the Albany zone.

Recommendation 2: Review number of available seats and bus sizes to cater for growth in student population. GSG is a significant user of the School Bus Service and, based on current enrolment data, we anticipate growth of approximately 15% in 2022 and a further 15% in 2023.

Recommendation 3: Provide families of students using the bus service with certainty for transport to their preferred school and ongoing access to transport.

Recommendation 4: Review the policy and its application to transport to school, particularly for non-government (independent) schools. Whilst the policy states a bus service should be offered to cater for student transport to a school “*offering an appropriate year or level of study and which is of an appropriate religious denomination or ethos to the student*” this is not applied in practice and this practice discriminates against families in regional areas.

Submission by Mrs Emma Franklin, Deputy Principal, on behalf of Great Southern Grammar.

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