



WACSSO

Partnering with P&Cs to
advance public education

Submission to the Inquiry into the Student Transport Assistance Policy Framework

WA Council of State School Organisations

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Acknowledgement of Country

The Western Australian Council of State School Organisations pays respect to Traditional Owners throughout Australia, recognising their connection to land, waters and sky.

We acknowledge parents, families, Elders and communities as first educators, sharers of culture and knowledge; and recognise the value this learning holds for children and young people.

Partnering with P&C since 1921

WACSSO acknowledges parents as the first educators in their child's life. We celebrate and honour the diversity of families and recognise the vital role they play in supporting children and young people throughout their learning journeys.

WACSSO uses the word parent to represent a child's primary caregiver/s, recognising the diversity of families.

This submission was prepared with the help of Western Australian public school parents, Parents and Citizen Associations (P&Cs) and school communities. WACSSO would like to thank those parents who have shared their experiences and concerns regarding School Bus Services through letters and calls to the WACSSO President and State Councillors, contact with the WACSSO Office, and responses to the WACSSO School Bus Services Survey.

About WACSSO

The Western Australian Council of State School Organisations Inc. (WACSSO) is the peak body representing parents of public school students in Western Australia. For over 100 years, WACSSO has provided services and representation at State and National level to more than 660 Parents and Citizens Associations (P&Cs). WACSSO is primarily a volunteer organisation made up of a President and State Councillors (representatives) from geographically based electorates. As such, the organisation has a wide representative reach across the state. WACSSO uses our strong networks with parents, carers and stakeholders in public education to inform our advocacy efforts.

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Introduction

WACSSO recognises accessibility to be a key pillar of equitable and high-quality education. School Bus Services (SBS) play an essential role in regional, rural, and remote communities and are vital for many Western Australian students.

All students have a right to commute to school in a safe, dependable, comfortable, and timely manner. Government funded school transport must not discriminate. The Western Australian public expects that public school bus services do not discriminate against a student's home address or the number of students at their school as a barrier to the service.

Our members and parents of children using SBS have highlighted the value of this service. However, their feedback has also raised a significant number of concerns relating to access, change of routes, reviews without consultation, withdrawal of seat places, and the perceived lack of understanding of rural and remote school communities.

Access to education should not place an unnecessary burden on parents and families. The Western Australian Government must ensure that the Student Transport Assistance Policy (STAP) delivers a high standard of service delivery. Where the STAP limits or impedes excellent service delivery, the Policy is at fault, not the clients it is in place to serve.

The Western Australian's Department of Education's Every student, every classroom, every day: Strategic directions for public schools 2020 – 2024 improvement drivers one and five highlights a commitment to bettering the accessibility of education for WA students; *1. Provide every student with a pathway to a successful future; "5. Partner with families, communities and agencies to support the educational engagement of every student."*¹

The STAP inquiry provides an opportunity for the State Government to address the shortfalls of the Policy and deliver a service that ensures all students and families have good accessibility to the schools they are enrolled in.

Regional, Rural and Remote Education

The 2018 Independent Review into Regional, Rural and Remote Education Final Report highlighted several actions and reforms required to address accessibility deficits in Australia's regional, rural and remote education delivery. The report's continuing theme was the difficulty of having the same level of access to the resources as their metro-based peers.

"Accessing education in RRR locations continues to be a very high priority and an intensely felt issue. As

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a parent remarked during a consultation, "when was this never the case"? During the era of expansion into rural Australia, access was primarily focused around communities convincing 'the authorities to provide a school. Today, with some risk of over simplifying, accessing education is essentially focussed on convincing 'the authorities' to retain a school and improve services." *Independent Review into Regional, Rural and Remote Education, Final Report, p69. 2*

The narrative of reducing services due to reduced student numbers is not received well in regional communities. Many of these communities live with the cycles of the predominant industries in their regions and towns. When faced with shutdowns, industry change, drought, and any number of impacting influences that see people moving in and out of the area, regional communities work to diversify the economy and rebuild. Removing the public services available in these towns creates a deficit that is extremely hard to recover. For regional, rural and remote communities to thrive, their services must not be withdrawn.

'The Munglinup community as a whole are deeply concerned about the on flowing effects of the proposed cancellation of the school bus services offered within the Munglinup farming community. By School Bus Services proposing to remove the school buses there is apprehension within the farming community that this will impact not only student numbers at the Primary School, but it will also impact the farming business's ability to employ full time permanent staff members who reside on these remote properties with their families. The outcomes of these on flowing effects not only are detrimental to our school and community organisations, it is also detrimental to the business owners health and mental wellbeing.' 3

Students living in regional, rural and remote areas face many challenges, including the tyranny of distance. Without specific strategies to combat these challenges, student learning can be impacted. Making it difficult or withdrawing access to School Bus Services adds another barrier. Safe and reliable transport to school is essential and must be recognised and funded as one of the strategies to address disadvantage and the impact of remoteness.

Students Living with Disability

Clear, well-resourced strategies must be in place to help address the additional challenges that students living with disability face. Reliable and appropriate student transport to school is essential and one of the strategies that improve a student's access to education.

In 1996 the then Disability Discrimination Commissioner Elizabeth Hastings conducted a series of consultations with education providers regarding education barriers and difficulties students with disability face accessing education. Twenty-five years on many of these barriers remain, transport to and from school is one of those named.

'Many students with disability have mobility limitations. Many have inappropriate behaviours, which can be allowed for in class, but which may create difficulties or embarrassment for the student in public. Many

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*have physical and medical problems which make independent utilisation of public transport problematic for them. Some students with disability attend schools and vocational or academic institutions far from where they live because those institutions offer support or accessibility others do not. offer support or accessibility others do not. Cost of special transport is a difficulty. Parent availability to transport students is not always possible, particularly where both parents work. Some education providers say transport to and from pre-school, school, college, or university is the biggest problem in providing access to students with disability.'*⁴

Eligibility Criteria

Feedback from WACSSO affiliates indicates that the eligibility criteria must be reviewed.

The interpretation of the nearest *appropriate* school needs to be considered in the context two different areas:

- Student with specific education needs due to disability, and
- Rural and remote communities.

The example from the small township of Munglingup below highlights the frustration of small communities.

*'One of our recent applications was rejected because they were not considered to be enrolled at their nearest "appropriate" school. However, this family have been and continue to be very active school community members. The student has already formed social and emotional relationships within the school and wider community, including after school extra-curricular activities over the course of the last 4 years. The family also attend the school-based playgroup with their youngest child who is due to start his primary school journey in 2024. School Bus Services have suggested that Jerdacuttup Primary School would be the best option for this family as they are closer by 3km. This family has no association within the Jerdacttup school community, and it is believed that it would be detrimental to the children's social and emotional development as they have already formed close relationships within the Munglingup school community. The family have lived in Munglingup and been part of the community for the past 13 years.'*⁵

Where a student has a lived connection to a school, it is traumatic to change schools solely due to being removed from a school bus service. Families are then faced with difficult decisions such as having a parent cease work to transport children to school, moving part of the family to a larger regional town so the children can go to school, or where this is not an option the student experiences the upheaval of being withdrawn their school.

Conveyance Allowance

A Conveyance Allowance is available to families who meet the eligibility criteria to assist in the costs of driving their child to and from school or an approved school bus services pickup/drop off point. The payment is calculated using the number of days a student attends school, multiplied by the kilometres travelled and the conveyance allowance rate, which is currently 22.04 cents per kilometre. Whilst feedback

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indicates that many parents are grateful for the funding assistance, the preference is always to access a school bus. This is because the time school transport has the most significant impact on families.

WACSSO recently advocated for families whose children attended Mosman Park School for Deaf Children (MPSDC). Some parents were faced with the heartbreaking choice of having to remove their child from, or not enrol their child in, the school where their child could access the curriculum in their first language-Auslan, and where deafness is not considered a disability.

Many of these students lived in the eastern suburbs- Armadale, Gosnells, Thornlie and Ellenbrook. Families have reported up to 45 mins to an hour for a one-way trip to the school, adding up to 3-4 hours per day to have their child attend MPSDC. The travel burden impacted the siblings who attend their local school, with parents unable to attend school drop-off and pickup times.

School Bus Services policy and guidelines state journey times above 90 minutes are not permitted, and where this is the case, a conveyance allowance can be paid. For many families, 21c/km (current at that time) did not resolve the significant impediment of the time and resources required.

There has been some progress in resolving this issue at Mosman Park School for Deaf Children. However, it is disappointing that parents must seek external support to advocate for their children to access the required services to attend school.

Travel Times

Parents acknowledge 90 minutes one way travel on a school bus is more than enough for a student. However, the feedback WACSSO has received is that anytime over 45 minutes is problematic, especially for students with disability and younger students. What is often overlooked is that when a student boards the school bus, their school day has begun. For some students, this means their school day begins before 7am and does not end until past 4pm, adding significant hours to their school week.

There is research suggesting that earlier start times for students can impact their sleep, wellbeing and learning outcomes. *'The American Academy of Paediatrics recognises insufficient sleep in adolescents as an important public health issue that significantly affects the health and safety, as well as the academic success, of our nation's middle and high school students. Although a number of factors, including biological changes in sleep associated with puberty, lifestyle choices, and academic demands, negatively affect middle and high school students' ability to obtain sufficient sleep, the evidence strongly implicates earlier school start times (ie, before 8:30 am) as a key modifiable contributor to insufficient sleep, as well as circadian rhythm disruption, in this population.'* ⁶

Increased time on buses for students also raises behaviour issues stemming from boredom, tiredness, and travel fatigue. Bus drivers, schools and parents report that this is an issue. While this Inquiry does not

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focus on safety, the Policy holds elements such as the ‘up to 90-minute travel one way’ , which plays a role in student behaviour.

A student may be eligible to use school bus services, but due to the inability of the criteria to address specific circumstance access to the service is withdrawn altogether. The need for flexibility in the eligibility criteria is particularly true for students living with disability. Partnering with the parents of these students may provide some workable solutions to address the challenges being experienced and to help ease the travel burden on both students and their parents.

‘My son, due to intellectual delay and Autism found it too long (over an hour), even though he got dropped off at his grandparent’s house that was closer to the school than his home was. He was happy initially but then it got too long. The bus people were helpful trying to make the trip enjoyable for him, i.e. music and sitting where he preferred. One suggestion would be to make it not compulsory to have to use the bus 5 days of the week if the trips are long ones. That is a lot to expect of kids on the bus everyday if it is going to be a long trip. Perhaps there would be vacancies available if children could use the bus for 3 days per week, and another family 2 days per week. Last year we had to stop using the bus, as that is when it got too long. Under an hour initially then became 2 hours. 2 hours is a long trip for anyone let alone a child with special needs, especially when directly to school is only 20 minutes away. Yes, my son attended a education support facility which is why our house is outside the intake area and further away from school than his grandparents’ house.’ (Parent response, WACSSO School Bus Services Survey 2021)

‘Our child access and Ed Support School. We feel that the journey time is too long. He is on a bus that picks him up at 7:10am. He then has the same long journey at the other end of the school day. He is on a bus for around 3 hours each day which makes him extra tired and he has less time for activities after school.’ (Parent response, WACSSO School Bus Services Survey 2021)

‘I have 2 sons who have attended Ed Support for Primary and now Secondary. I have attempted to access the School Bus Service for them, but I find the morning pickup times for children in the Murray District very early for children with a disability e.g., 6:50am, 7:00, or 7:05am. The issue is the length of time our children are on the bus which can be as long as 60-90minutes. The reason given is always the same, there a not enough buses to service the Murray District alone, so they combine the Mandurah pickups for the same schools. Children that have Autism struggle with being left idle for lengthy periods. In order to be eligible for the bus service you have to access it for a minimum of 3 days before and after school. So if you wanted to trail how your child would cope, by slowing introducing them to the bus trip, you dot have that option.’ (Parent response, WACSSO School Bus Services Survey 2021)

Spurs enable improved pick up and drop off points for students more than 2.5km off the main bus route. While this creates better access for students, it also has the impact of increasing travel times. Spurs is an example of the complexity faced by the Public Transport Authority to make school bus services both accessible and student-friendly.

A comprehensive review focusing on the time students spend travelling on school buses to and from school is necessary to assess the impacts on student wellbeing, safety, happiness and educational outcomes. Longer travel times will always be a factor of rural and remote education and will also be a consideration for students who attend specialist education support schools to be provided with the best learning environments. Whilst extended travel time for these cohorts may always be a requirement, it is essential that the systems are reviewed, tested and funded to provide better travel experiences, increased access, and the best education outcomes for students.

Engagement and Consultation

Parents report a level of inflexibility when communicating their circumstances with School Bus Services. Feedback also suggests that reviews are conducted with little or no consultation. Where consultation is deemed to have occurred, it does not allow for community feedback to influence predetermined actions. WACSSO suggests that this lies at the heart of parents' frustration. Their voices and circumstances are not often heard well or require advocacy from external parties to have a suitable outcome.

Item 9.5 of the Policy states:

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. SBS will engage; School Bus Advisory Committees (parent representative groups), Contractors and schools to ensure all affected parties are provided with the opportunity to discuss any concerns. 7

Openness and transparency in reviews have not been the experience of our affiliates and parents.

'...look at the big picture, that changes to the school bus services affects both country and metropolitan students. It affects students with disabilities. This has rolling consequences for everyone. If the Public Transport Authority wishes to make changes to the transport borders and where their pay per ride buses are needed then they need to visit the communities...' (Parent response, WACSSO School Bus Services Survey 2021)

The STAP refers to School Bus Advisory Committees as parent representative groups. For parents seeking to connect with these committees, there is little contact information on the committees, who sits on the committees, or information on the ability to nominate to join the committee. WACSSO requests that these committees and their structure be made available on the SBS website to assist parents to engage with them.

Budget Constraints

WACSSO acknowledges that there are finite levels of service and support that can be offered; however, given the nature of the submissions made, we request that the Committee review the budget allocations for School Bus Services as part of this Inquiry. Should budget allocations be found to be inadequate, and

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as such impact equitable access to school for regional, rural and remote students and students living with disability, we ask that the Committee address this deficit in their recommendations.

Conclusion

WACSSO has welcomed the opportunity to make comment on behalf of our affiliates regarding the Student Transport Assistance Policy Framework. We look forward to seeing the recommendations that will come from the Committee with the hope that these recommendations will improve the accessibility to School Bus Services for students and ease the transport burden of families.

In closing it is important to note the dedicated people who drive school buses, and those who work as bus assistants supporting students with disability as they travel to and from school. Orange school buses are a common sight on regional roads at the start and end of school days. We also recognise those who work in the Department of Education and the Public Transport Authority who along with parents want our school buses to be safe, reliable, and accessible. The feedback from parents is submitted to support the Inquiry and drive a culture of continual improvement, always with the goal of better outcomes for Western Australian students.

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