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Mr Mick Gentleman MLA
Chair
Standing Committee on Planning and Environment
ACT Legislative Assembly
GPO Box 1020
CANBERRA ACT 2601

Dear Mr Gentleman

On behalf of P&C Council, I provide the attached submission to the inquiry into ACTION buses.

Council's submission focuses on the terms of reference relating to how well ACTION meets the needs of different segments of the community and principles and key priorities for future service planning.

We provide our comments from the perspective of parents of students in ACT government schools.

Yours sincerely

Kathleen Barden
President

18 May 2007

P&C COUNCIL SUBMISSION TO THE ACTION BUS INQUIRY MAY 2007

1. Introduction

P&C Council is the peak body representing Parents' and Citizens' Associations from ACT Government schools.

The purposes of P&C Council include the fostering of an ACT public education system of the highest quality, and making representations on behalf of P&Cs on matters affecting education in ACT Government schools.

School transport, including bus transport, is clearly a matter affecting education in ACT Government schools. It impacts, for example, on the accessibility of education, parental school choice and Year 12 retention rates.

This submission concentrates on meeting the needs of government school students. Council is concerned that in some areas ACTION is not currently meeting these needs. This is based on feedback Council has received from government school parents and students.

2. Transport needs of government school students

The basic transport need of students in government schools in the ACT is that there be an ACTION bus service that provides safe, reliable and timely transport for students to and from their homes to their surrounding schools.

Furthermore, ACTION plays a vital role in delivering the Government's obligation under paragraph (d) of section 18 of the *Education Act 2004* to provide reasonable access to public education for all students in the ACT. This must include providing public transport services to enable students to access, at the very least, the government schools in their surrounding neighbourhoods.

Based on feedback from parents and students, Council is concerned that ACTION is not meeting the needs of all students in ACT government schools by:

- not providing school buses for some ACT government schools where there is a demand;
- not meeting reasonable service standards that parents expect for school bus transport, such as minimum waiting times before and after school.

Council understands that a range of factors is likely to be contributing to this situation (funding, planning processes, communication links etc), but would like the causes to be examined and strategies put in place to meet the needs of government school students.

Council is aware of the following examples where the needs of government school students are not being met:

- there is no bus service for Arawang Primary School or Duffy Primary School although both received increased enrolments following the closure of other schools in Weston Creek. The Government promised Weston Creek communities that bus services would be re-routed to meet their transport needs following the closure of schools. Arawang Primary received at least 47 students from schools that were closed at the end of 2006 including Weston Creek, Rivett and Mt Neighbour Primary Schools. A parent survey at the school indicates that there are sufficient student numbers to warrant a dedicated service directly to/from Arawang (the survey results will be set out in the submission from Arawang Primary School);
- similarly, while Stromlo High School has experienced a significant increase in enrolments (over 100 students) it has had no net increase in bus services to the school;
- the need for a service from Flynn to Charnwood-Dunlop Primary School (as promised by the Government to the community of the now closed Flynn Primary School). Forty students moved from the now closed Flynn Primary School to Charnwood-Dunlop Primary School at the beginning of the year;
- an inadequate service between the Woden Interchange and Narrabundah College (not all students can fit on the one bus);
- the need for a morning school bus service for children attending Telopea Park School from the Weston/Woden area;
- the need for an afternoon service that operates as the reverse of the morning service from Higgins to Melba (route 672). Children can catch the bus in the morning, but in the afternoon have to use a different service that involves walking home from a different and more distant drop-off point;
- the bus from Giralang to Kaleen High School (route 452) arrives around 8.15am, more than 30 minutes before the start of school. A later bus arrives only a few minutes before the bell, and can easily be late. The regular route services (52 or 53) are often late or very full and have not turned up on occasion, so they do not provide a reliable alternative;
- the need for the four school buses departing from the front of Lyneham High School to depart at 3.10pm rather than 3.05pm to allow students to reach the departure point in time after the 3.00pm bell. Students frequently miss the bus because the physical size of the school and the number of students does not allow them to get to the bus stop in time;
- the need for a bus to bring students to Lyneham High School from the Belconnen area;

- the community of Tharwa remains without appropriate bus services to the nearest primary schools. The one mini-bus service offered by Kiers does not go to Bonython Primary School where the majority of Tharwa students have relocated. Also, this bus is fully subscribed with high school students. Effectively there is no public transport choice for many of the government school students in Tharwa. Council asks that Government and ACTION work with Tharwa community to rectify this situation. This community was severely disadvantaged by the closure of their local school, and the Government should support the decision by the majority of parents to send their children to Bonython Primary School.

There is also a need to examine the safety implications of school students using route buses in terms of road and pedestrian safety, for example:

- students using the route bus from Woden to Telopea Park School need a safe crossing on National Circuit;
- students travelling from the Causeway to Telopea Park School need safe crossings to the west of the school because they disembark in Griffith.

Council recognises that this is not an issue solely for ACTION. It requests that ACTION works with Department of Transport and Municipal Services to identify and address safety black spots such as these.

Parents are also concerned about student safety around bus interchanges. Council is aware that ACTION is examining this issue and implementing strategies to address interchange safety. These strategies should be pursued as a priority.

Other safety issues relate to:

- the need for drivers to comply with safe passenger load limits (and the need for a clear process for drivers to follow in situations where the number of passengers exceeds the safe load limit. Not picking up school students or asking students to give up their place on a bus have their own implications for student safety); and
- the need to consider the safety of primary school children and children with special needs when they are travelling on buses with older children.

3. Issues and strategies

3.1 Role of ACTION in providing school bus transport

P&C Council believes that the role of ACTION in providing school bus transport for government school students should be specifically recognised and funded in the Government's service agreement with ACTION. Funding levels should ensure that ACTION is able to meet the full demand for bus transport for government school children. This includes the provision of services to enable students to access, at the very least, the government schools in their surrounding neighbourhoods.

Funding levels should also ensure that ACTION is able to meet an agreed set of service standards for government school bus services (service standards are discussed further under section 3.7).

The agreement should establish the priority of government students travelling to school as part of the Government and community's commitment to public education and to maintaining high retention rates to Year 12. This should ensure, for example:

- that students not be required to give up their place on a bus to allow other commuters to board (leaving the students to walk to school);
- that college students are not accorded lesser priority because years 11 and 12 are seen as non-compulsory years of schooling. College students need to be able to arrive at their classes on time. Arriving late to school is disruptive for the students but also for others whose classes are interrupted by their late arrival. Also, students can be failed in a subject if they miss too many classes, adversely affecting their Year 12 certificate results;
- that government school students are accorded at least equal priority as non-government school students (explored further in section 3.2);
- that there is consideration of the needs of college students (and increasingly students in Years 9 and 10) with vocational training or work commitments requiring bus services throughout the day.

Ensuring the availability of school bus transport should form part of the Government's program of promoting government school education in the ACT. It also links with the Government's strategy for reducing the ACT's greenhouse emissions. Increased use of school bus transport would reduce car travel to schools, while also providing the potential for parents to leave the car at home and use public transport to travel to work.

Strategies to increase the number of government school children travelling to school by bus, including through the provision of adequate funding to ACTION, will deliver savings in other areas; specifically, it will reduce the need for spending on measures to relieve traffic and parking congestion around schools. This will also improve safety around schools and contribute to social equity goals (providing a more economical transport option for disadvantaged families).

3.2 Government and non-government school service provision

As stated above, Council believes that government school students should be accorded at least equal priority as non-government school students when it comes to bus transport services. ACTION needs to be able to publicly demonstrate that this is the case by reporting against a set of indicators, for example, information needs to be publicly available to show ACTION expenditure for the government sector compared with the non-government sector. Monitoring systems need to be in place to provide this information. Council believes that there should be public accountability on this issue, and that any subsidies or assistance to the non-government school sector should be easily identifiable in the interests of transparency.

3.3 Schools Transport Liaison Committee

Council strongly supports ACTION's move to re-establish the Schools Transport Liaison Committee to provide advice, information and guidance to the Department of Territory and Municipal Services and ACTION on the transport needs of ACT government and non-government schools. Council is currently considering a draft terms of reference for this Committee, and Council looks forward to its representation on this group.

3.4 Policy for the Provision of School Bus Services

Part of the role of the School Transport Liaison Committee should be to establish (or renew) as well as oversee a policy on the provision of school bus transport, taking into account the findings of this Inquiry. Council is aware of a previous document entitled *ACT Government Policy for the Provision of School Bus Services* (copy attached); however, we are not certain of the current status of this policy. Council believes that such a policy, agreed between stakeholders, should be in place and publicly accessible.

The policy should cover, for example:

- the process for matching school bus services and demand (see section 3.5);
- the conditions for schools having a dedicated service or a route service;
- a process whereby school communities can request a dedicated bus service;
- the priority of school students on regular route services;
- service standards for school bus transport (see section 3.7);
- indicators to demonstrate that government school students are accorded at least equal priority as non-government school students (as per section 3.2); and
- travel safety.

3.5 Matching of school bus services and demand

School communities need to be confident that a process is in place to ensure the best possible matching of government school bus services and demand. The School Transport Liaison Committee could have a role in documenting the current process, examining its effectiveness and making any recommendations for change.

To make the process more effective, there may be a need to strengthen the role of schools in more accurately establishing the school bus transport needs of their communities, and communicating these needs to ACTION (through the School Transport Liaison Committee). Each school should have a funded school transport liaison officer to undertake this, as well as other roles (such as providing bus information to the school community and identifying safety concerns).

Part of establishing demand is ensuring that each school community is aware of the public transport options that are available (both dedicated and regular route services). This includes providing the relevant information to parents and students at the start of, and during, the school year. Many schools already make sure that this

happens. A bus map for the ACT that shows dedicated and route services for government schools would be useful.

The process of establishing demand should also include a feedback loop from bus drivers to ACTION management to report instances where school children using route services are not picked up or have been asked to give up their place on a bus because of passenger load limits, or where timetabling issues have led to late runs and missed connections.

Council requests that there be a system whereby ACTION takes immediate action to address any situations where school communities identify the need for a bus service (dedicated or regular route service), but this cannot be met within ACTION's existing constraints. Such action may include advising the Government that there is a need for modification of those constraints.

School communities should be surveyed about their bus transport requirements at appropriate intervals. It is important that, from time to time, surveys include non-users to establish the reasons why they might not use school bus services. Measures for improvement or further service standards may emerge from such a survey.

Council also believes that there is a case for trialling bus services where demand is emerging or close to the critical mass needed for a dedicated service. The trial would allow communities an opportunity to demonstrate and/or build the required critical mass. A case in point is the need for a school bus service for children attending Telopea Park School from the Weston/Woden area. There are currently two well-patronised buses in the afternoon from Telopea Part School to Woden, but no service in the morning. In this case, with such a strong indicator of demand, a trial service would establish whether or not there is a critical mass of students for a dedicated service.

There should be effective communication mechanisms in place between the ACT Department of Education and Training (DET), the Department of Transport and Municipal Services (TAMS) and ACTION to ensure the exchange of all information relevant to the provision of student bus services.

3.6 Restructuring of ACT Government Schools under *Towards 2020*

The matching of services and demand for 2007 has been made particularly difficult for ACTION by the Government's *Towards 2020* changes, many of which were implemented in the final weeks of 2006. Council believes there was a failure on the part of Government to work with ACTION to ensure adequate forward planning to cope with the *Towards 2020* school closures and changes – many of the examples given in section 2 reflect this. As such, Council believes there is a need to check that the current school bus services reflect the changes to school enrolments and student travel patterns that have resulted from *Towards 2020*.

In delivering the *Towards 2020* proposal, the Minister for Education and Training committed to ensuring that there would be bus services to transport students from closed schools to their receiving schools. The Government, through ACTION, must

honour this commitment. Council is aware of instances where this commitment has not been honoured to date, for example:

- the Flynn Primary School community was told by the Government that it would be possible to have an ACTION bus from Flynn to Charnwood-Dunlop School. No bus service has been established so far;
- when a number of primary schools in Weston Creek were closed, the Government assured concerned parents that bus services would be made available to students forced to relocate to schools further away from their homes. In fact, there is no dedicated bus service to and from Arawang Primary School or Duffy Primary School, and only one bus service to Chapman Primary School that goes to Kambah rather than through the Weston Creek region.

Some aspects of the *Towards 2020* plan are still to be implemented over the next two-three years, and need to be taken into account in service planning. This includes further school closures, the establishment of P-2 schools, and new schools in West Belconnen, Harrison and Gungahlin. Bus transport should be considered as an integral part of the planning for these new schools. The planning process provides an opportunity to establish services and infrastructure in a way that will encourage students to travel to school by bus.

3.7 Service standards around school bus services:

The School Transport Liaison Committee should work to establish a set of service standards for government school bus services. Services need to be reliable for the safety of students and to encourage patronage.

Service standards should include:

- a minimum waiting time after school finishes before the arrival of the bus service;
- a minimum waiting time before school commences;
- minimum waiting times at bus interchanges on popular connections;
- already established standards, such as safe passenger loads.

The Government's funding and service agreement with ACTION should be based around the meeting of these service standards. The establishment of the service standards will most likely require changes to service provision to meet the standards.

3.8 Student Transport Program

Council supports the Student Transport Program, but asks whether it may be possible to streamline application procedures for parents, for example, move from the requirement for an application each term to an application each semester or year. Council also requests that this program be better publicised to potential beneficiaries.

3.9 Principles and key priorities for future service planning

As outlined in the sections above, key principles and priorities for future service planning include the need:

- to meet the full demand for bus services for government school students;
- for government school students to be accorded at least equal priority as non-government school students;
- for strong communication links between ACTION, TAMS, DET, parent organisations, schools and colleges;
- for service planning to be based around meeting service standards for school bus transport covering, for example, safety, reliability and timeliness;
- to actively encourage the number of government school children travelling to school by bus for environmental, budgetary and social equity reasons.

4. Summary of Recommendations

P&C Council recommends that:

- 4.1 the Government's service agreement with ACTION specifically recognises and funds its role in providing school bus transport for government school students;
- 4.2 funding be sufficient to allow ACTION to meet the full demand for bus transport for government school children and to meet an agreed set of service standards;
- 4.3 a set of indicators be developed to demonstrate that government school students are accorded at least equal priority as non-government school students, and that ACTION develop systems to allow this information to be reported to the public;
- 4.4 the School Transport Liaison Committee establish a policy for the provision of school bus services;
- 4.5 the process for matching school government school bus services and demand be reviewed and strengthened where necessary;
- 4.6 a set of service standards for government school bus services be agreed;
- 4.7 the application procedures for the Student Transport Program be reviewed to establish whether they might be made simpler for parents.

**ACT Council of Parents' and Citizen's Associations
May 2007**

ACT GOVERNMENT POLICY FOR THE PROVISION OF SCHOOL BUS SERVICES

1. Purpose

The purpose of this paper is to articulate the ACT Government's policy for the provision of school bus services.

In so doing the policy should provide an agreed and transparent framework for parents, schools, and ACTION regarding decisions on the provision of dedicated school bus services.

2. Stakeholders

The stakeholders are:

- ACTION Authority
- the Department of Urban Services
- Peak groups representing parents of school children
- Peak groups representing non-government schools
- The Department of Education and Training.

These stakeholders are all represented on the School Transport Liaison Committee (STLC), which has endorsed this policy following consultation.

3. Objectives of the School Bus Service Program

The School Bus Service Program will provide a fair and reasonable level of public transport access for Canberra school students.

4. Definitions

School bus services – include either regular route services (whether direct or interchanging) or dedicated school services, or a combination of the two, preferably involving no more than one interchange between services.

Dedicated school bus services – follow a regular timetable and route, and are available to school students only, not the general public. However, parents may travel with young children to assist them to get used to bus travel.

5. Principles

The following principles should be balanced and applied in the provision of dedicated school bus services:

- The cost to Government of dedicated school bus services will be governed by ACTION funding arrangements.
- Decision making regarding the provision of a dedicated school bus service will be based on the most efficient use of resources, taking into account

existing regular route and dedicated school services in the local area, and other network needs.

- Student safety accessing dedicated school and regular route services in the local area will be addressed wherever possible by school education programs.
- Dedicated school bus services should arrive at schools as close as possible to the start and end times of the particular school.
- The reasons for decisions regarding the provision or non-provision of dedicated school bus services should be articulated and documented.

6. Previous policies

Previously, there was no written policy detailing when a dedicated school bus service will be provided. A general rule, included in the Government's contract with ACTION, is that dedicated services will not be provided where regular patronage is less than 27 students. This is a very simple statement that fails to acknowledge the range of factors relevant to decisions about such services.

7. Policy to guide future provision of services

7.1 Process for requesting a school bus service

There is a need for a structured way of requesting a school service to ensure a fair and effective allocation of resources. The process for requesting a school bus service is as follows:

- parents requesting a service contact their school or ACTION;
- if the school wishes to take the matter up with ACTION, the school refers the request, and an indication of demand for the service if possible to ACTION;
- ACTION considers/investigates the request in accordance with the agreed policy;
- ACTION makes a decision in regard to the request as soon as possible and within six months;
- the decision is reported to the particular school and the School Transport Liaison Committee, including the reasons for the decision;
- ACTION advises the school of the timing of the introduction of a new service, or adjustments to the existing services.

7.2 Decision making criteria

There are several key criteria to be considered in making a decision regarding the provision of a school service. The following criteria are to be considered in decision making about the provision of new services, the nature of new services and the adaptation of existing services:

- the age of the students;
- the level of demand for the service;
- the locations of demand for the service;
- the availability of, and convenience of access for students using, regular route services in the local area of the school;

- the availability and carrying capacity of existing dedicated school bus services in the local area;
- impact on the scheduling of regular route services;
- the available funds for dedicated school bus services; and
- parking and traffic issues.

All criteria are to be considered and balanced. For example, while there may be a high level of demand for a dedicated service, the existence of several regular route services close to a high school would generally rule out the provision of a dedicated school bus service.

Age of students

Primary school aged students are generally less able to cope with interchanging than high school students and the Program should aim to reduce the amount of interchanging required for these younger students. These students warrant a high level of priority in allocating dedicated school bus services.

However, there will be some instances where primary school students are required to interchange between regular route services, and between dedicated school services and regular route services.

Children with special needs

Children with special needs are generally less able to cope with interchanging, and so should be accommodated with a direct service where possible (i.e. where the number of students using that service would be sufficient). In addition, ACTION should continue their policy of providing assistance to these students when interchanging, through both drivers and interchange supervisors.

Demand

The efficient use of resources demands that only school bus services with strong patronage be operated.

Demand is sufficient to warrant consideration of providing a new dedicated service where the needs of at least 27 students can be accommodated by such a service.

Where there is a lower level of demand, consideration should be given to combining school services for geographically proximate schools with similar start/finish times, or through a service to a major interchange.

Where patronage on an existing service drops below 15 students for a sustained period, ACTION may review the service and consider withdrawing the service or adjusting school services in the area.

Location of demand for a service

Typically, non-government schools draw students from a broad geographical area and school bus services will reflect this spread where demand warrants. Increasingly, Government schools have a broader geographical spread of students, as the Department of Education and Training's policy is that students should have a choice of Government schools.

As a general principle, the decision of a parent to send children to a school further from their home is a personal choice and parents and schools cannot assume that such decisions can be accommodated through the provision of dedicated school bus services funded by the community at large.

Students attending schools that are not geographically proximate to their home may be required to travel to school using regular route services, by interchanging to a dedicated school service, or by private means, due to the lack of demand for, or impracticality of, direct school services to more distant schools.

Availability of, and convenience of access for student using, regular route services

Regular route services close to the school may provide adequate public transport access. Students should be able to access such services in a safe manner and without having to walk long distances.

Where regular route services offer pick-up or drop-off points that are difficult or dangerous for students to access, consideration should be given to a dedicated school service. Safety considerations are different for children of primary school and high school ages. In some instances physical works may be appropriate to address safety concerns, requiring a whole of government approach to resolve these issues.

Regular route service timings may be suitable or may be able to be adjusted slightly to accommodate school needs. This also applies to the route taken by a regular route service.

In the event that demand on a regular route services is very high, consideration may be given to providing a dedicated service mirroring part or all of the regular route service, as the carrying capacity of regular route services would otherwise be tested, and amenity for non-school travellers could be compromised.

Where regular route services are excessively long or circuitous, or require multiple interchanges for school passengers, consideration should be given to a direct, dedicated school service.

Availability and carrying capacity of existing dedicated school bus services

Wherever possible, demands should be met by existing, or adjustments to existing, dedicated school buses servicing the school or other schools in the area.

Dedicated school services may operate to multiple, geographically proximate schools with similar start/finish times to consolidate patronage.

Available funds for dedicated school bus services

ACTION has a limited bus fleet and other resources (e.g. funding for drivers, fuel etc.) from which to allocate buses to a dedicated school service. The expansion of ACTION resources is dictated in accordance with Government budgetary considerations.

The limitation on the number of buses is especially true for morning services, which coincide with the morning commuter peak. Afternoon return services are less problematic as they precede the evening commuter peak.

Impact on scheduling of regular route services

Should a need for a dedicated school service be established in accordance with the above criteria, the impact of that service on the existing regular route network also needs to be considered. Where there is minimal impact, the service would be provided as soon as possible. Where the impact is significant it may not be possible to provide the new service until new network is introduced.

Parking and traffic issues

Parking and traffic issues at schools may require the postponement of the provision of new school bus services while physical works are implemented. Alternatively, education programs provided by the school may be required to improve parking and traffic issues.

8 Ongoing operation of dedicated school bus services

Students will be dropped off/picked up no more than 30 minutes and no less than 5 minutes from start and finish times. Where part of the school has a different start/finish time, the earlier start and later finish time will be the guide. Services will be provided for the same start and finish times every day of the school term and cannot be altered for individual days.

Schools will provide ACTION with enrolment information as soon as possible and at the latest by mid October each year.

Schools will provide ACTION with any changes to start/finish times 12 months in advance if possible, to allow for the rescheduling of route services. Scheduling requirements of regular route services can make alterations to

school services difficult and time-consuming. Where possible ACTION will endeavour to make minor change as quickly as possible.

ACTION will advise schools a minimum of two week ahead of any changes to bus pick up/drop off times.

ACTIONN will carry students in accordance with the legal carrying capacity.

ACTION will report to the STLC each term on new requests for dedicated school services, ACTION's decision on the request and the reasons for the decision.