



Submission: Transport Canberra – School Bus Policy

Overview of Submission

Catholic Education Archdiocese of Canberra and Goulburn (CECG) comprises of 56 systemic schools across the Australian Capital Territory (ACT) and New South Wales (NSW). CECG educates approximately 14,000 students in 29 ACT schools and 7,000 students across 27 NSW schools.

The ACT Government through Transport Canberra and City Services released a public consultation paper titled “School Bus Policy” on 18 June 2018 outlining a major restructure of the school bus network and services.

CECG has analysed the proposed policy in an attempt to understand the impact the changes would have on its 29 ACT schools. This analysis indicated major disruption to current services and highlighted a number of concerning areas that have not been addressed through the consultation period. These include:

1. A lack of understanding about student safety and duty of care responsibility through:
 - a. A significant increase in students of all ages sharing public transport with the public and greater exposure to potentially unsafe behaviour in the community
 - b. No priority being given to students on public transport to ensure they reach their destination
 - c. Increased instances of students needing to make multiple bus changes to reach their destination with prolonged periods at interchanges
 - d. Little consideration about infrastructure to support safe movement including additional crossing, under or overpasses, suitable pathways, etc – especially where bus stops now occur across from the school not at the school gate
 - e. Little information about support staff monitoring students including experience, qualifications, Working With Vulnerable People checks, training, etc
2. A lack of understanding many of the practical dimensions of student bus travel including:
 - a. New special school bus routes taking longer to get to school due to avoiding main roads
 - b. How an increase in missed buses by students will be actively managed due to an increase in multiple transfers
 - c. How increases in walking time to make connections will be timetabled to prevent buses being missed and students not arriving at their destination as scheduled.
3. Other issues include:
 - a. Setting an arbitrary limit on dedicated buses without consideration of individual school and student need
 - b. Ensuring sufficient capacity of services during peak travel so that no student is left behind



- c. How communications and complaints will be handled both from the public due to increased interaction with students, and also from students and families due to growing frustration with the declining service levels
- d. How Transport Canberra will actively and transparently monitor, evaluate and report on the proposed changes and make necessary, timely modifications.
- e. A lack of awareness of zoning and how it differs in the Government and Non-Government education sectors and the impact changes in bus routes can have on enrolments through a significant reduction in real or perceived services.

CECG has attempted to engage with Ms Meegan Fitzharris MLA, Minister for Transport, who has not responded to our letter and with Transport Canberra. Transport Canberra staff provided only superficial information during a briefing on 7 August 2018 and did not grapple with the issues outlined above.

Despite best attempts, the ability of CECG to accurately determine impact has been frustrated through a lack of information and data. It should also be noted that the data used by Transport Canberra during the briefing, did not correspond with the experience of CECG principals and further reduced the confidence of CECG in the proposed policy and underpinning model.

Due to this lack of genuine consultation, CECG requests an extension to the consultation period and active engagement and discussion on the issues raised.

Overview of Proposed Changes

CECG understands there are several different types of transport services proposed in the network change by Transport Canberra. These are, in order of priority (as set out by Transport Canberra):

1. Encourage own transport
2. Use of the general public transport network
3. Provide School "S" trips on general public transport routes
4. Hub and spoke services
5. Direct, dedicated school bus services

Summary of Impact on Catholic Schools

The secondary schools, including congregational schools are covered through dedicated school bus services. The key change from the previous network which would impact the Catholic Secondary Schools (Diocesan) would be the reduction in number of school bus routes from 94 to 21 (reduction of 78%). Congregational Schools would be impacted with a reduction of 78% from 81 school bus routes to 18 based on information available in the Transport Canberra website (comparison of current timetables vs proposed timetables).

Schools which will be impacted the most would be the Primary Schools. 16 out of 24 Primary Schools will only be serviced through the general public routes.



Primary schools in Campbell, Evatt, Gowrie, Holder, Nicholls, Wanniasa will experience a slightly lower impact, as these schools will retain dedicated school bus services although with reduced number of routes (decreasing from 27 to 6 (78% reduction)).

The only school which has had an increase from 4 dedicated school bus routes to 5 is St. John The Apostle Primary School in Florey but it is uncertain if these 5 dedicated services will be the same buses that also service St Francis Xavier College – just 100m down the same road – in which case, these schools will also see a decrease in services.

While the reduction in dedicated bus routes could be attributed to low patronage levels, the key concerns affecting schools are around the safety of students at bus stations and on public buses, particularly for the primary school children. The following safety measures are proposed in the draft school bus policy:

- Monitored CCTV cameras at bus stations and fitted on all buses
- Customer service officers located at key interchanges
- Student safety officers to be recruited in 2019.

While the above measures are stated, **the policy lacks details** particularly on the number of customer service officers and student safety officers and the role they would play to ensure the following safety concerns, including:

- How will the students be supported when interchanging?
- How many customer service officers and student safety officers would be available at each interchange?
- What is the specific type of support provided to Primary students?
- What is the process to handle any incidents which will be a breach of safety?
- What support is provided to school students inside the buses, particularly for Primary students?
- Schools are not able to supervise proposed new remote bus pick up and set down areas away from the School – how will Transport Canberra manage this responsibility now? For example, CECG's largest school has up to 800 students catching buses each afternoon and this is currently supervised by 4 staff members.
- Whether there will be sufficient path capacity at stops to allow students to safely get on and off buses

Apart from the safety concerns, several other concerns raised by schools are:

- The utilization of general public buses for school services could result in full buses, which may not be able to handle the capacity during peak time, resulting in a wait – is there a priority for students getting on general public buses? Currently, this issue is alleviated as an appropriate sized-bus transports the students.
- Timing impact of interchanging – students who need to interchange will have a longer commute compared to the current scenario.
- Some school services driving past certain schools and not picking up students because a school cannot have more than 4 dedicated buses.



- Lack of a conversion table mapping current school services to new network and associated timings – without this information the impact cannot be assessed
- When will Transport Canberra be able to provide a network trip planner for students and families impacted by the proposed change?
- There will need to be additional supervised pedestrian crossings for new bus pick up and set down zones – how are these being planned and budgeted for?
- The fact that some students will need to catch three buses to get from school to home.
- The rationale for making significant changes to the bus services to schools that are not directly located or impacted by the light rail.

Initial Impact Assessment to Catholic Schools

CECG has requested specific information on the impact to Catholic schools from Transport Canberra, to no avail. While Transport Canberra has detailed data on patronage levels by location, none of this has been made available to help determine demand levels and the immediate impact on students and parents.

The information presented in the tables below illustrates CECG's best attempts to understand the impacts of the proposed policy. This has been achieved through manual comparison of current bus routes and services across CECG's 29 ACT schools against the policy that has been outlined.

Over the coming weeks, CECG will attempt to quantify student bus use across its ACT schools to better inform understanding.



The lack of data made available by Transport Canberra and how it has been used to inform modelling remains very concerning.

CECG ACT Primary schools

School	Total Enrolments (Feb'18 Census)	Current Network – Availability of School Route	Impact from Network Change		
			General Public Route	Availability of "S" Trips	Dedicated Service
Amaroo	702	Yes (3)	Yes	No	No
Aranda	196	Yes (1)	Yes	No	No
Calwell	448	Yes (5)	Yes	No	No
Campbell	147	Yes (3)	Yes	Yes	Yes (1)
Charnwood	340	Yes (1)	Yes	No	No
Conder	600	Yes (2)	Yes	No	No
Curtin	332	Yes (1)	Yes	No	No
Evatt	418	Yes (4)	Yes	Yes	Yes (1)
Florey	343	Yes (4)	Yes	No	Yes (5)
Garran	245	Yes (3)	Yes	No	No
Gowrie	622	Yes (2)	Yes	No	Yes (1)
Harrison	692	Yes (2)	Yes	No	No
Holder	383	Yes (2)	Yes	No	Yes (1)
Kaleen	195	Yes (2)	Yes	Yes	No
Kambah	287	No	Yes	No	No
Narrabundah	155	Yes (1)	Yes	No	No
Nicholls	640	Yes (6)	Yes	Yes	Yes (1)
O'Connor	269	Yes (2)	Yes	No	No
Page	318	Yes (2)	Yes	Yes	No
Pearce	298	Yes (6)	Yes	No	No
Red Hill	123	Yes (5)	Yes	No	No
Wanniassa	433	Yes (10)	Yes	No	Yes (1)
Waramanga	177	Yes (4)	Yes	No	No
Watson	290	Yes (6)	Yes	No	No

Current number of bus routes: 77 – numbers in () indicate the number of bus routes

2019 number of bus routes: 11 – reduction of 86%



CECG ACT Secondary schools

School	Total Enrolments	Current Network – Availability of School Route	Impact from Network Change		
			General Public Route	Availability of “S” Trips	Dedicated Service
Braddon	671	Yes (22)	Yes	No	Yes (4)
Florey SFX	1192	Yes (16)	No	No	Yes (5)
Griffith	961	Yes (34)	No	No	Yes (6)
Gungahlin	796	Yes (6)	Yes	Yes	Yes (1)
Isabella Plains	1784	Yes (16)	Yes	No	Yes (5)

Current number of bus routes: 94

2019 number of bus routes: 21 – reduction of 78%

CECG ACT Congregational schools

School	Total Enrolments	Current Network – Availability of School Route	Impact from Network Change		
			General Public Route	Availability of “S” Trips	Dedicated Service
Daramalan	1407	Yes (24)	Yes	No	Yes (4)
St. Edmund’s	641	Yes (33)	No	No	Yes (6)
Marist	1179	Yes (24)	Yes	No	Yes (8)

Current number of bus routes: 81

2019 number of bus routes: 18 – reduction of 78%