



# **The wheels are not going round and round**

**VCOSS Submission to the inquiry into the use of school buses in rural and regional Victoria**

**June 2021**

The Victorian Council of Social Service is the peak body of the social and community sector in Victoria.

VCOSS members reflect the diversity of the sector and include large charities, peak organisations, small community services, advocacy groups and individuals interested in social policy.

In addition to supporting the sector, VCOSS represents the interests of Victorians experiencing poverty and disadvantage, and advocates for the development of a sustainable, fair and equitable society.

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A fully accessible version is available online at [vcoss.org.au/policy/](http://vcoss.org.au/policy/)



VCOSS acknowledges the traditional owners of country and pays respect to past, present and emerging Elders.

This document was prepared on the lands of the Kulin Nation.



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## Introduction

The Victorian Council of Social Service (VCOSS) is the peak body for social and community services in Victoria. VCOSS supports the community services industry, represents the interests of Victorians facing disadvantage and vulnerability in policy debates, and advocates to develop a sustainable, fair and equitable society. VCOSS members span rural, regional and metropolitan Victoria.

VCOSS welcomes the opportunity to provide feedback to the Victorian Economic and Infrastructure Committee's inquiry into the use of school buses in rural and regional Victoria.

Transport helps people to access the opportunities around them and build a meaningful life. The more limited a person's transport choices are, the more limited their opportunities. Transport connects communities to services, facilitates social connectedness, and opens education and employment opportunities. When the transport needs of communities are not met, people face unaffordable transport costs, experience social isolation, and have limited, reduced or no access to healthcare, community services, or food shopping.

While rural and regional Victorian communities are diverse and their needs differ, they are united by a lack of adequate and appropriate transport.

We commend the Committee for considering how school buses could be used to fill the gap in transport needs in rural and regional Victoria but note that the priority must be child safety.

Expanding access to school buses in a limited way could help some people get where they need to go. But school buses are not a silver bullet. Addressing transport disadvantage will need to look well beyond just the use of school buses, to more services, better connections and integration between services, improved accessibility and a clearer understanding of the needs of different communities.

This submission builds on 10 roundtable discussions VCOSS undertook in 2018 with regional community organisations across the state,<sup>1</sup> and was informed by targeted consultation with our members about this inquiry.

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<sup>1</sup> Victorian Council of Social Service, *The Voices of Regional Victoria: VCOSS Regional Roundtables Report*, November 2018.

## Recommendations

- Undertake a place-based, independent analysis of transport disadvantage to assess the financial, social and economic impacts for rural and regional Victorians.
- Identify and fund place-based transport strategies that address transport disadvantage in local communities.
- Clarify roles and responsibilities of state government departments and local government for transport planning, coordination and funding.
- Review the safety of school students in transit, and relevant duty of care policies.
- Consider requiring and subsidising a Working with Children's Check for students aged over 18 years who are accessing the bus under the post-secondary students and apprentices criteria, rather than reliance on verbal checks.
- Review processes for determining school bus routes and stops, to ensure they are responsive to changing community need and parent requests.
- Explore the feasibility of adding additional stops to relevant TAFE campuses and training providers to service eligible post-secondary students and apprentices.
- Allow parents/carers of three- and four-year-old children attending kindergarten or childcare to use school buses on school routes.
- Require school buses to meet accessibility standards and advocate to the Commonwealth to amend the *Disability Standards for Accessible Public Transport 2002* that currently exempt school buses from meeting accessibility requirements.
- Recognise the role of community transport and provide adequate block funding to enable providers to service rural and regional communities.

## Rural and Regional Victorians experience transport disadvantage

### RECOMMENDATIONS

- Undertake a place-based, independent analysis of transport disadvantage to assess the financial, social and economic impacts for rural and regional Victorians.
- Identify and fund place-based transport strategies that address transport disadvantage in local communities.
- Clarify roles and responsibilities of state government departments and local government for transport planning, coordination and funding.

Transport disadvantage compounds other forms of disadvantage and reduces access to opportunities.<sup>2</sup> It makes it harder to learn, work and socialise. Too many rural and regional Victorians struggle to get where they need to go. Unreliable or insufficient services, inaccessible vehicles and inconvenient routes all contribute to transport disadvantage.

VCOSS members spoke of families unable to attend important health or child protection appointments, or being unable to take advantage of important prevention and early intervention programs because of no transport options. Some households will prioritise medical appointments, leaving them without enough time and money to get to social activities, sporting matches, or art and recreational activities. This leaves children unable to get to extracurricular activities or catch ups with family and friends.

Reliance on private cars is higher in rural and regional Victoria. If public transport does not provide a genuine option for people to get to school, work, shopping or services, people have little choice but to use private vehicles. The costs of registration, insurance, maintenance and fuel are high, adding financial stress for low-income households. For those without access to a car, they are dependent on the availability and generosity of a family member or neighbour.

Children and young people not old enough to get a driver's license are particularly disadvantaged. VCOSS members also report there is insufficient support for adults aged

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<sup>2</sup> J Pope, *The role of infrastructure in addressing regional disadvantage in Victoria*, Background paper prepared for Infrastructure Victoria, October 2019.

over 25 years to gain their driver's license, including those from culturally and linguistically diverse backgrounds.

When families cannot get to their local kindergarten and students cannot get to school, the consequences can be lifelong. For example, attending two years of high-quality early learning is a key factor in preventing children from starting school behind, and children experiencing disadvantage stand to gain the most.<sup>3</sup> Starting school behind can lead to early school leaving – and students who leave school early are more likely to be at risk of long-term unemployment and poor mental health outcomes.<sup>4</sup>

Getting to school has been identified as a key issue with school attendance in metropolitan Melbourne<sup>5</sup> and is exacerbated by distance and limited options in rural and regional Victoria. For example, one VCOSS member in regional Victoria identified a cohort of students were not engaging in school because their part of the community was not serviced by public transport and was not on the school bus route. This is likely to be a problem for students studying at TAFE or undertaking post-school training.

VCOSS members told us in many of their communities when liaising with state government transport was seen as “no one's problem”.

Connecting different departments and levels of government with communities and local organisations will be required to address transport disadvantage and improve outcomes for rural and regional Victorians.

An independent, place-based analysis should be funded by government to understand the full impacts of transport disadvantage, including the role of geographical location, where services are located in communities, and where education and employment opportunities are compared to existing transport infrastructure.

Issues to be considered in this analysis include:

- Improving access between towns and regional centres, not just transport to and from Melbourne.

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<sup>3</sup> S Fox, M Geddes, *Preschool – Two years are Better Than One: Developing a universal preschool program for Australian 3 year olds – evidence, policy and implementation*, Mitchell Institute Policy Paper No. 03/2016, Mitchell Institute, October 2016.

<sup>4</sup> S Lamb, J Jackson, A Walstab & S Huo, *Educational opportunity in Australia 2015: Who succeeds and who misses out*, Centre for International Research on Education Systems, for the Mitchell Institute.

<sup>5</sup> WEstjustice, *Travel Assistance Program*, September 2020.

- Making it easier for people to travel from regional towns to outlying areas or farms where they work.
- Providing services where people need to travel. For example, VCOSS members spoke about existing bus routes only servicing a limited route to the railway station.
- Adding evening and weekend public transport services so people can get to work, sport and social activities.
- Improving the integration and coordination of services and planning so users can connect easily between services on their journey.
- Improving accessibility of all transport modes, including train stations, to support access for people with disability, older people, people with health conditions or short-term mobility restrictions, and young families with prams.

***“If we can intervene early in families’ lives, we can make a huge difference, but what we find is they’re struggling to get their children to kinder or playgroup... We’re often working one on one with families for resolutions but feel our hands are tied as there’s no funding or infrastructure to support them to access those services.” – Mallee Family Care***

## School buses are one part of the puzzle

### RECOMMENDATIONS

- Review the safety of school students in transit, and relevant duty of care policies.
- Consider requiring and subsidising a Working with Children's Check for students aged over 18 years who are accessing the bus under the post-secondary students and apprentices criteria, rather than reliance on verbal checks.
- Review processes for determining school bus routes and stops, to ensure they are responsive to changing community need and parent requests.
- Explore the feasibility of adding additional stops to relevant TAFE campuses and training providers to service eligible post-secondary students and apprentices.
- Allow parents/carers of three- and four-year-old children attending kindergarten or childcare to use school buses on school routes.
- Require school buses to meet accessibility standards and advocate to the Commonwealth to amend the *Disability Standards for Accessible Public Transport 2002* that currently exempt school buses from meeting accessibility requirements.

The Committee is exploring options for extending school bus services to other members of the public to help rural and regional Victorians get where they need to go. School buses are a main form of transport in many rural and regional towns, and have vast coverage across the state. We commend the Committee for its consideration of how to make best use of school bus resources and infrastructure.

VCOSS members identified a range of opportunities and challenges in extending school bus services to the general population, or to identified cohorts of non-school students. Some were in support of opening up school routes to non-school students, with appropriate safeguards in place. Others would prefer reforms to focus on getting the most out of school

buses outside or in between school hours. And concerns about child safety were important to everyone.

All VCOSS members consulted agreed that extending the school bus program will not resolve the deep transport disadvantage faced by many rural and regional Victorians, and should form just one part of a broader suite of actions to tackle the barriers to transport affordability, accessibility and utilisation.

## **Safety must be the priority**

Providing a safe environment for children to travel to and from school must be central to the scheme. Schools are required to actively identify and manage risks to child safety. Any extension of school bus services must comply with Child Safe principles and standards.

Some VCOSS members reported concerns in their community, especially among parents and carers, about extension of school bus services to the general public. They expressed concern that parents may not want their children to use school bus services if they opened to adults from the general public, potentially undermining their importance in supporting school attendance and engagement.

Others noted that there are already risks to student safety on buses that must be managed, including bullying, discrimination and racism. Increased presence of adults could actually prevent these kinds of harms.

Consideration should be given to a requirement for anyone over the age of 18, including students or school leavers already eligible to travel on school buses, to gain a Working with Children's check rather than reliance on verbal reference checks. Where appropriate the costs of these checks should be subsidised.

Other considerations could include a strengthened complaints process, a review of duty of care policies, and training for bus captains and drivers on child safety.

## **Communities lack awareness of existing transport options**

There appears to be some confusion or a lack of knowledge about existing policies that enable coordinating principals to determine access to school buses for post-secondary students and apprentices, pre-school students, and the general public, with appropriate checks (for example the requirement that general public applicants provide a Working with Children check).

An extended program should be accompanied by appropriate communication strategies to make sure people who would benefit from the service know about it and can access it.

Some existing policies also act as a barrier to using this program. For example, current guidelines only enable a four-year-old kindergarten child to access the bus where their early learning service consents to their capacity to travel independently, which is a significant risk for a service to bear.

## **Use of school buses outside of school hours should be considered**

School buses have significant “down-time” between school hours and during school holidays. But for many community members including older people, shift workers and single parents, these may be the times they would or could travel. The Committee should consider better utilisation of school bus infrastructure and drivers outside of or between school hours.

VCOSS members spoke about their efforts to explore options in extending the use of school buses outside of school hours but experienced a range of barriers, including:

- Difficulties navigating responsibilities between multiple government departments and private bus operators.
- Insufficient organisational resources to manage significant procedural requirements and paperwork.

Government should lead the planning process and logistics of contract management in the use of school buses outside of school routes but work in partnership with local communities to determine appropriate routes and timing to ensure it meets the needs of local communities.

## **Consider vulnerable cohorts and priority groups**

VCOSS members identified several groups who would benefit from extension of the school bus program.

Young people who are early school leavers and undertaking further education and training (such as at TAFE or through an apprenticeship) are particularly vulnerable to transport disadvantage. Better transport options would provide them with opportunities for more or different work, and to connect with their communities.

For those young people attending school, there could be benefit in extending the school bus program to enable travel between schools to attend an outside school hours care program where their school does not offer a program, or other sporting or recreational activities.

Consideration should be given to whether the service could be extended to three-year-old children with appropriate permissions and safeguards in place. Members also noted that enabling pre-school aged children to access the bus normalises the experience and supports the transition to primary school.

VCOSS members also noted that for some children, kindergarten or childcare may be safer than home with the added benefit of providing children access to nutritious food and supporting developmental growth. VCOSS members were concerned that removing access to school buses for these children may have unintended consequences for their health, safety and wellbeing.

Extending the use of school buses to parents/carers of three- and four-year-old children to attend kindergarten or childcare would also support engagement with early learning. Routes may need to be reviewed to ensure they stop at kindergartens and childcare centres.

## **Routes and capacity must be appropriate and regularly reviewed**

As well as lack of knowledge, low capacity and poor route planning limit the value of school buses to reduce transport disadvantage among non-school students.

For students to achieve their potential, they need to be able to get to school. School buses are a vital part of encouraging school engagement and attendance in rural and regional Victoria, and are the only option for many rural and regional students. Expansion of the school bus program to other members of the community should not be at the expense of any children needing to get to school. But many VCOSS members reported limited capacity on local school buses, so opportunities for non-school students to travel on buses will be few.

School bus routes also might be inappropriate and need to be reviewed as communities grow and change. For example, school bus routes do not always travel close to where students live, or do not stop at TAFE campuses or training providers, so are of limited use to eligible post-secondary students and apprentices.

Processes to request changes are complicated and time-consuming. Appropriate review channels need to be available to parents/carers and the community to request additional stops to school bus routes for eligible students.

The current process to request a new school bus stop requires parents of students to make a request to the coordinating principal and allows for parents to contact bus operators directly.<sup>6</sup> But there is little opportunity for parents/carers and community members to have requests reviewed if they are denied.

For example, one VCOSS member organisation experienced several barriers in successfully extending the school bus route to service a group of students who were being excluded from the school bus route. This was despite evidence that this group of students, many of who were Aboriginal or from low-income households, were not attending school because of transport barriers. The school principal was resistant to updating the route and it took the community organisation over 12 months of negotiating with the private bus operator directly to change the route.

## Services must be inclusive

School buses are exempt from the *Disability Discrimination Act 1992* so are inaccessible to many people. The Victorian Government should advocate to the Commonwealth for changes to the *Disability Standards for Accessible Public Transport 2002* (the Standards) that exempt school buses from meeting accessibility requirements.<sup>7</sup> In the absence of changes at the Commonwealth level, the Victorian Government can require buses to meet accessibility standards as part of procurement or contract management.

In addition, the accessibility of bus stops needs to be addressed to ensure school students and the general public can actually get *on* the bus.

It is unclear whether buses would remain exempt from the Standards if they were used outside of school times. The definition of “dedicated school bus and dedicated school bus service”<sup>8</sup> probably means a bus is only a school bus when it is performing school duties but this requires clarification.

VCOSS members spoke about the important role of community transport in bridging access gaps for some children and young people with disability in traveling to education through their services. While these additional options may improve *access* for some students, it does not address *inclusion*.

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<sup>6</sup> Public Transport Victoria, School Bus Program, School bus stops, accessed 10 May 2021 <<https://www.ptv.vic.gov.au/tickets/regional-tickets/victorian-school-buses/school-bus-program/>>.

<sup>7</sup> *Disability Standards for Accessible Public Transport 2002* (Cth)

<sup>8</sup> *Disability Standards for Accessible Public Transport 2002* (Cth) s.1.13

## An integrated approach to transport planning

### RECOMMENDATION

- Recognise the role of community transport and provide adequate block funding to enable providers to service rural and regional communities.

Current provisions that enable access to school buses on the school route for the general public have not solved transport disadvantage in rural and regional areas. While communication strategies may increase the uptake of existing pathways, school buses will not be the quick fix to giving rural and regional Victorians access to a wide range of services and opportunities.

VCOSS encourages the Committee to consider other options for tackling transport disadvantage in rural and regional Victoria, especially by focussing on the potential to grow and support community transport.

### Support community transport

Community transport plays a vital role in increasing accessibility of transport for those who can't access or use cars or other transport because of cost, geographical isolation or mobility issues. Community transport is an important part of the transport infrastructure in rural and regional Victoria and provides affordable, flexible, accessible and adaptable services to people experiencing transport disadvantage.<sup>9</sup>

Unlike current regulation that exempts school buses from meeting accessibility requirements, community transport is accessible for older people and people with disability from young children to those in their later years. Community transport has the potential to meet the needs of rural and regional communities, however, it needs additional funding. Community transport providers are oversubscribed with no resources to increase services to meet demand.

Many community transport services are funded under a volunteer model that covers the cost of some infrastructure but relies on volunteer drivers. A key issue raised by VCOSS members is that infrastructure (such as vehicles) is only part of the issue. Volunteers, even

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<sup>9</sup> VicTas Community Transport Association, 'Welcome', accessed 9 December 2020, <<https://www.vtcta.org.au/>>.

when they are available, are not free. It takes time and costs money to train, supervise and manage volunteers and to factor in risk management.

During the COVID-19 lockdowns in Victoria much of the volunteer workforce dried up, and many have not returned to volunteering positions. The community transport sector is heavily reliant on volunteers and lacks funding to employ paid staff to replace the volunteers lost.

While community transport is primarily funded through Commonwealth funding mechanisms, the state could extend the role and provision of community transport to service rural and regional communities to address transport disadvantage through the provision of block funding. Block funding provides predictable revenue, which supports forward planning and enables community transport providers to pay for drivers when volunteers are unavailable.

## Explore on-demand and flexible transport

VCOSS members held mixed views about on-demand transport services. For some, on-demand was seen as a way to meet the needs of individual community members. For others, the additional capacity and requirement for infrastructure to be idle to be ready 'on-demand' was not seen as the best use of transport infrastructure.

VCOSS members spoke of local programs such as GisBus working well to service their community by providing an ongoing permanent route and an on-demand roaming service.<sup>10</sup>

## Review routes and utilisation

Government should also consider existing uptake and effectiveness of current bus and transport routes in rural and regional communities to explore whether changing routes and/or timetables could improve transport outcomes. Additional services should also be considered.

Government could take lessons from a previous inter-government initiative, the Transport Connections Program (TCP). This model was designed to partner government departments with local government and community organisations to “build capacity for local communities to work together on overcoming transport disadvantage”.<sup>11</sup> A Victorian Auditor-General's Office Report found that due to poor governance, oversight and monitoring as well as limited community engagement there was little evidence to determine how effectively the program

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<sup>10</sup> GisBus, How does GisBus work?, accessed 10 May 2021, <<https://gisbus.com.au/how-does-gisbus-work%3F>>.

<sup>11</sup> Victorian Auditor-General's Office, *Local Community Transport Services: the Transport Connections program*, March 2011, p. viii.

improved local transport. The report also found, however, that many aspects of the model were sound and made recommendations to improve accountability. Government could revisit this model with increased leadership and strengthened compliance from government to explore transport solutions in local communities.

