



Tasmanian Council of Social Service Inc.

Submission to Support School Transport and the NDIS Discussion Paper

May 2018



INTEGRITY
COMPASSION
INFLUENCE

About TasCOSS

TasCOSS is the peak body for the community services sector in Tasmania. Our membership includes individuals and organisations active in the provision of community services to low income, vulnerable and disadvantaged Tasmanians. TasCOSS represents the interests of its members and their clients to government, regulators, the media and the public. Through our advocacy and policy development, we draw attention to the causes of poverty and disadvantage, and promote the adoption of effective solutions to address these issues.

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Introduction

TasCOSS represents the interests of low-income, vulnerable and disadvantaged Tasmanians. In this regard, we advocate for affordable, accessible, effective transport systems for Tasmanians facing transport disadvantage—difficulty accessing transport as a result of cost, availability of services or poor physical accessibility, in relation to both public and private transport.

In preparing this submission, TasCOSS has sought out a range of views, including from parents of children with disability, whether currently eligible for state assistance with supported school transport or not; advocates for families of children with disability; and schools serving children with disability. We have also participated in NDIS workshops where we have heard the views of operators of special needs bus services in the state.

We have heard that the way in which any student, but particularly a student with disability, gets to school has an impact beyond simply helping access classroom learning. Well-supported transport to school can give students the opportunity to build relationships with peers and carers and to develop their independence. Where students are not adequately supported, however, getting to school can be a tiring, frightening or isolating experience. Any changes to the existing system—which works very well for some students, although not for others—should work to incorporate and expand all the advantages of the current system while addressing shortfalls.

The existing system

Around 200 students with disability in Tasmania currently receive some form of support in getting to and from school. This support can come in the form of dedicated bus services or in the form of individualised supports such as taxi vouchers or a conveyancing allowance for parents who drive their children to and from school themselves. Specialised school bus services for students with disability make up 16 of the state's 400+ bus contracts, for the most part servicing the state's three specialised support schools.

In our consultations, TasCOSS has heard that supported transport is a vital part of school attendance for children with disability, particularly where both parents are working. Parents who currently do not receive support in getting their child to school often wished that they were able to receive such support.

"Working great. Great bus driver and carer."

Key positive elements of the existing system singled out by respondents include:

- **Predictability.** Parents appreciated the fact that services operated in a predictable fashion, making it easy for children with disability to anticipate the day's routines and to know who they would be seeing on the bus.
- **Reliability.** Parents appreciated the fact that services contracted by schools could be counted on to show up, with the challenges of finding replacements for sick drivers/support workers left to others.
- **High quality of service.** Some parents said that their children's bus drivers and bus support workers were particularly skilled and trustworthy. *"Working well - shared buses. What could be better - drivers who obey road rules and genuinely care for the kids."*
- **Good relationships built up between children, support workers and other children on the bus.** *"The Northern Support school transport is excellent and everyone knows each other and the interaction is great."*
- **Contribution towards costs.** Parents who drive their children to school appreciated the conveyance allowance. *"I prefer to personally take my child to and from school. Conveyance Allowance is a huge help to families, especially with the cost of all other medical and on-going cost families have to deal with. Paying a small amount of your petrol fee is a help."*

By contrast, key inadequacies of the existing system identified by respondents include:

- **Limited eligibility.** Some parents who responded received no support with transport at all; others received support under the NDIS for individualised transport support, but wished that their children were part of the bus system.
- **Limited availability, for instance across all days of the school week or at the right times for school schedules.** *"Reliable and safe, however my girls miss 45 minutes of class every day as the contractor picks up at 2.30 and they're the only ones on the bus."*

- **Lack of individualised options such as a personal support worker on normal school buses.** *“Due to not having an aide, he has been banned from the school bus twice.”*
- **Inadequate numbers of support workers on buses and impact of challenging behaviour by some students on other students.** Some buses, for example, carry 12 children with challenging behaviours with only one support worker, meaning that it is difficult to mitigate the impact of challenging behaviours on other children.
- **Very long bus rides.** In some cases, long journeys have their basis in the large catchment areas of the state’s support schools; the Southern Support School, for instance, has a catchment area that extends to areas two hours away by private car. However, these long journeys, and even shorter ones, are made more time-consuming by the number of students on buses, meaning that multiple stops are required. *“The bus he catches home on the Thurs is still 20 minutes from our home and it takes anywhere from an hour to an hour and 20 for a 20 min trip. This is a really long trip for anyone let alone a 7 year old disabled child (the Mon Tues Wed bus takes 30 min).”*
- **Lack of disability awareness education for other children on regular school buses and public transport, resulting in bullying.** *“He doesn’t feel safe on buses because of the peer groups and bullies.”*

Proposed changes

We asked respondents to complete an electronic survey on what supported school transport for their child would look like if they could organise it themselves, and how it would be different from what they currently receive.

Many said that they did not see the need for change from the existing model, which they felt is working well; among this group, the most common sentiment was “If it isn’t broken, don’t fix it.” These responses suggest that the rationale and evidence for a change in the model will have to be more clearly communicated to stakeholders.

Other parents and stakeholders simply wanted to see the existing model expanded. This could include:

- **The expansion of services to cover all school days.** *“At the moment I need to take him two mornings a week (40 min each way) as the bus that he catches in the morning only goes Mon Tues and Wed. We would like the Mon Tues Wed bus to run every day.”*
- **Increased numbers of dedicated buses so that runs would not have to be so long.**
- **The expansion of eligibility to more students.** *“We currently receive no support. We need funding towards travel to get our son to school each day. [We would like him to] be in a school bus with his peers like other children his own age.”*

In our consultations, we found that the parents and stakeholders who were most likely to express support for a changed model for supported school transport either do not receive support under the existing system, or find the support that they receive inadequate.

Those who do not currently receive support, as noted above, often simply wished to see the existing system expanded to include their children. These parents were relatively unconcerned about the challenges of organising supported transport themselves, in effect saying that anything was better than nothing.

“[Compared to the existing situation, where we receive no support, we would find it] much easier [to organise and pay for school transport].”

Meanwhile, those who found the existing system inadequate noted that individualised transport could be a relief for students who currently face bullying by their peers or long travel times on shared services.

“For some children [the ability to access individual transport] will be a relief. Bullying is a big problem in the school buses, especially for [children with disabilities].” “[If we organised transport ourselves, we] could be more flexible with route used and if it wasn't a bus with other children then the time spent travelling would be reduced.”

However, all parents who already receive some form of support under the existing model expressed more concern about having to organise and pay for supported transport themselves. Concerns included:

- **The challenges for people on low incomes of managing up-front payments.** *“It would be harder to pay up front and get rebates later.”*
- **Lack of time to take on another aspect of management of their children’s support.** *“It would make it harder. I don’t have the time. I want it to stay the same.”*
- **Worries about finding support workers in rural and regional areas.** *“It is hard enough finding regular support workers for community care, let alone the same supports for [transport to and from school].”*
- **Worries about finding good support workers if more clients are competing for the individualised services of support workers who currently may be supporting multiple students on buses.** *“Good support workers are [already] like hens teeth.”*
- **Worries that funding will not cover both a driver and a support person.** *“My preference is to have two people present as we do with our current bus, which has a driver and an aide.”*
- **Worries over the reliability of individual transport providers, compared to contracted companies.** *“Would still like bus contractor transport as individual support workers would not be reliable and may leave child stranded.”*

TasCOSS notes the concern expressed in the submission to this discussion paper by the Victorian Council of Social Service, which notes that: “There are many reports of NDIS participants whose plans are significantly cut during reviews...our members strongly consider that families should not have to ‘fight’ for school transport funding each year.”

Parents already receiving individualised transport support via the NDIS in fact confirmed that a system that puts the onus on parents to organise transport imposes a substantial burden. *“It has been a hard slog to organise his own support workers and school transport.”*

The proposal to create an intermediary position of transport broker to address some of these concerns met with mixed responses from parents. Some felt that such an intermediary could play a valuable role, provided that they were properly funded in a student’s NDIS plan. *“It would be good as long as the extra funding was included.”*

Others, however, were concerned that funding for a transport broker would inevitably cut into core therapeutic funding. *“I don’t agree with that. It could mean less money for other things like physio and speech. I’d prefer the system to remain the same. Don’t fix what’s not broken.”*

Some parents also noted that beyond the impact on families, more individualised transport has the potential to put a significant burden on:

- **Schools.** A number of parents noted that with more students travelling individually, schools will have to cope with yet more traffic in the morning and the afternoon, possibly compromising

students' safety in the process. *"I don't want to organize it myself. This would mean my child goes to school on a bus or car alone and lines up with 112 other students in their cars. How could the school handle that?"*

- **Existing shared transport services.** Some parents and stakeholders worried that under an individualised model, shared transport services such as buses may become unviable because the sum of each individual student's funding will not be enough to ensure the continuation of a shared service, particularly in rural areas but also in any situation where student numbers fluctuate from year to year. *"Does [individualised funding] create a disability bus?"*

The impact of individualisation on equity and inclusion

Beyond the impact of an individualised model on parents and carers, many parents and TasCOSS members raised a broader question of whether a more individualised approach to supported school transport would in fact advance broader goals of equity and inclusion for people with disability.

Equity

TasCOSS members and other stakeholders were particularly worried that having to organise transport will be a challenge for many—some said most—parents. One educator, for instance, felt that at the moment, a substantial proportion of parents would struggle to engage effectively even with a transport broker. As a consequence, parents will need to be supported in effective engagement with the NDIS system even before they are supported by a transport broker in engaging with transport providers. Unless such support is provided, the risk is that parents with better engagement skills will be able to negotiate better outcomes for their children, while the children of those without such skills will be left behind.

Inclusion

A number of parents emphasised that a more individualist model of supported transport undercuts the goal of inclusion of people with disability, in a number of ways.

- **Intensification of social isolation:** Many parents felt that individualised transport would simply isolate their children from their peers. As one parent wrote: *“He will always need supported independence but it would have been much easier on us as parents if the powers that be could see his need to be an ordinary student on a bus with his peers through his eyes.”*
- **An abandonment of the principles underpinning the Disability Discrimination Act:** A number of parents and stakeholders opined that a move towards individualised transport undercuts the intent of the Disability Discrimination Act, which seeks to include people with disability in all areas of life. In particular, the continuing exemption of school buses from meeting disability access requirements under the Disability Discrimination Act—which the proposed model does not address-- is felt by many to be fundamentally incompatible with the Act’s objectives of making public places accessible to a disability. *“I think all children should be able to take the same bus, whether wheel chair users, children with intellectual disability, ASD etc. At the moment this is not possible. NDIS is going to create segregation.”*
- **A missed opportunity to address negative attitudes towards people with disability:** Some respondents felt that while bullying is unquestionably one of the factors discouraging some children with disability from accessing shared transport such as school buses and public transport, what is needed is a change in attitudes of other children, rather than students with disability withdrawing to individualised transport. *“[We currently drive him to school and sometimes he takes the bus home.] [If I could design a supported transport system for him], he would take a bus independently and feel safe and secure to do that. [At the moment] he doesn’t feel safe on buses because of the peer groups and bullies.”*

Students not covered by the NDIS

Due to Tasmania’s comparatively stringent requirements for existing supported school transport, it appears that the majority of Tasmanian students currently receiving supported school transport would meet NDIS eligibility criteria for transport as a “necessary and reasonable” support. Nevertheless, some TasCOSS members expressed concern over the future of children with autism, who are more vulnerable to falling outside the NDIS. More broadly, as noted above, the greatest concern with the existing model appears to be that many students are not eligible—and the discussion paper offers no clear answer as to how this issue will be addressed. TasCOSS shares the concern of the Victorian Council of Social Service that at the national level, “supported school transport [could] become another area in which interface issues develop and that the burden of transport for students not in the NDIS would fall to parents, carers and families.”

Conclusion

It is not clear that consultation to date will have reached most parents in Tasmania. More data will be required before a conclusion can be drawn as to whether existing systems should be retained and expanded or whether NDIS should cover supported school transport.

In either case, NDIA should:

- Share all relevant data and research with all stakeholders—including students, parents and carers—to ensure that they have the opportunity to make fully informed decisions on the future of transport support.
- Provide clearer evidence as to why changes in the existing model are needed and why the proposed model has been chosen.
- Provide greater information as to how the proposed model will address the absence of critical mass, and what NDIA will be doing to ensure that existing services do not collapse.
- Ensure that students with disability who are not NDIS participants still have access to supported school transport services.
- Ensure that any new models are trialled in different environments and evaluated before broader roll-out.
- Maintain strong quality and safeguarding arrangements for supported school transport services.