



JFA
Purple Orange

JFA Purple Orange Submission

**Responding to the Commonwealth Government
Department of Social Services Supported School Transport
and the National Disability Insurance Scheme Discussion
Paper**

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About the Publisher

JFA Purple Orange is a non-government, social profit organisation. Anchored on dialogue with people living with disability, their families, service providers, government and other stakeholders, we seek to identify policy and practice that has the prospect of advancing peoples chances of a good life. Our work is anchored on the principles of Personhood and Citizenship. Our work includes research, evaluation, capacity building, consultancy, and hosted initiatives.

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1 Purpose and Background

In this submission we are responding to the Supported School Transport and the National Disability Insurance Scheme Discussion Paper released by the Australian Government Department of Social Services (DSS). We appreciate the opportunity to respond to this discussion paper.

Across Australia, supported school transport is currently provided to some students living with disability so that they can travel to and from school. Currently, this service is provided by individual State and Territory Governments with different arrangements in place between jurisdictions. States and Territories typically deliver supported school transport services themselves or commission providers to deliver these services. Currently, supported school transport includes specialised school buses, smaller transport vehicles, independent travel training and allowances paid to families.

In their discussion paper, DSS proposed two broad options for supported school transport going forward. First, the current system could be retained and supported school transport arrangements could remain the responsibility of State and Territory Governments. Second, a new national supported school transport model could be implemented within the National Disability Insurance Scheme (NDIS). In this option, families or a third-party delegate would directly engage the services of a supported school transport provider who would be paid via invoice from the students NDIS plan.

2 Approach

In this submission we provide perspective on transport to and from school for students living with disability and deliver feedback on DSS' proposal. Specifically, we outline the general principles we think should underpin the delivery of school supported transportation, and drawing on these principles we respond to a number of the consultation questions outlined in DSS' discussion paper. We also present a series of recommendations for DSS regarding the implementation of supported school transportation across the country.

This submission is based on our views as an independent, non-government organisation that fosters innovation, and promotes policy and practice that support and improve the life chances of people living with disability.

Our views are also shaped by resources acquired through a process of literature search and review as well as participation in the DSS supported school transport workshop conducted in Floreat Western Australia on June 27.

3 Agency Information

JFA Purple Orange is a social policy agency based in South Australia. JFA Purple Orange and its predecessor organisations have been involved with the disability community, older people and other vulnerable groups for more than 130 years.

All of the work we engage in at JFA Purple Orange is underpinned by the values outlined in our Model of Citizenship Support,¹ a comprehensive contextual framework for organising policy and practice in support of people living with disability. The Model of Citizenship Support asserts that every human being seeks to build a good life for themselves, anchored on expressions of Citizenship, driven by Personhood. *Personhood* reflects people living with disability exercising personal authority, and *Citizenship* refers to people living with disability being active citizens in the life of the community.

The model contends that a good life largely depends on the availability of life chances – the assets and opportunities available to a person. The model sets out a framework for how people can be supported to build their chances of a good life with Citizenship. It asserts that our life chances comprise four different, interrelated, types of assets or *Capitals* we can call upon. These are: Personal Capital (how the person sees themselves), Knowledge Capital (what the person knows and can apply), Material Capital (money and the tangible things in the person’s life) and Social Capital (other people in the person’s life). These Capitals apply to any person and can help reveal what types of investment and assistance might be helpful for someone to build a good life.

4 Principles Underpinning Supported School Transportation

There are a series of general principles that we think should underpin the delivery of supports under the NDIS and are relevant to the provision of supported school transportation. Below, we identify and detail each of these principles.

Access and Inclusion

Australia is a signatory to the United Nations Convention on the Rights of Persons with Disabilities. Under the convention the State Parties committed to:

“take all necessary measures to ensure the full enjoyment by children with disabilities of all human rights and fundamental freedoms on an equal basis with other children.”²

Further, in realising an “inclusive education system at all levels”³ State Parties agreed to ensure:

“persons with disabilities are not excluded from the general education system on the basis of disability, and that children with disabilities are not excluded from free and compulsory primary education, or from secondary education, on the basis of disability”⁴

¹ Williams, R. (2013). *Model of Citizenship Support 2nd Ed.* Adelaide: JFA Purple Orange.

² United Nations (2008). *Convention on the Rights of Persons with Disabilities.* Page 7.

³ United Nations (2008). *Convention on the Rights of Persons with Disabilities.* Page 14.

⁴ Ibid.

Lastly, State Parties committed to:

“take appropriate measures to ensure to persons with disabilities access, on an equal basis with others, to the physical environment, to transportation, to information and communications, including information and communications technologies and systems, and to other facilities and services open or provided to the public, both in urban and in rural areas.”⁵

These human rights obligations are implemented in Australia through the Commonwealth Disability Discrimination Act 1992 (DDA). The DDA protects people living with disability against discrimination by making it unlawful in Australia to discriminate against a person because of the disability they live with.⁶

The Disability Standards for Education (the Standards) came into effect to clarify the rights of students living with disability under the DDA. Under the Standards, all students have the right to access educational programs. Further, students must be able to participate in education and training on the same basis as students that do not live with disability.⁷

Clearly, through the United Nations Convention on the Rights of Persons with Disabilities, the Disability Discrimination Act 1992, and the Disability Standards for Education, Governments have a responsibility to ensure that children and young people living with disability have access to education and the transportation necessary to allow them to participate in this education. All students need to go to school so there must be mechanisms and services in place to achieve this.

We endorse the key principle stated in the DSS Discussion paper that school children and young people living with disability should, to the extent that they can, use mainstream travel options as other children do. They should also be able to access their local community school and transport to mainstream schools should be funded where needed.

Choice and Control

In addition to having access to supported school transportation, students living with disability and their families should also have choice and control over this support.

The NDIS has been described as the biggest reform to the human service system in Australia since the implementation of Medicare.⁸ The NDIS moves away from the previous welfare

⁵ United Nations (2008). *Convention on the Rights of Persons with Disabilities*. Page 8.

⁶ Australian Government Department of Education and Training (2015). *Disability Discrimination Act 1992 Fact Sheet*.

⁷ Australian Government Department of Education and Training (2015). *Disability Standards for Education 2005 Fact Sheet*.

⁸ Parnell, D. (2014). National Disability Insurance Scheme: Opportunities and challenges. *The Australian Journal of Psychosocial Rehabilitation*, 7(1), 4-5.

system, towards a system that promotes individual supports, person-centered planning and community-based options.⁹

One of the primary values that underpins the NDIS is choice and control. People living with disability deserve to have authentic choice and control over their lives, the supports that they engage in their lives, and the way that these supports are structured. Instead of being passive recipients of Government provided or commissioned supports, people living with disability deserve to decide for themselves which supports they will engage. People living with disability should also have the flexibility and freedom to structure these supports in the manner that fits best with their life. Further, people should be able to choose providers and services from a dynamic, innovative and competitive NDIS support services market.

Young people living with disability and their families should have choice and control over the supported school transportation arrangements in their lives. Students and families should have the opportunity to select a supported school transport provider, should be able to decide on the type of transport service they would like provided and should have the opportunity to negotiate with the provider on the conditions or specifics of the transport service they are engaging.

Safeguarding

It is imperative that under any new supported school transport system implemented, mechanisms are in place so that students are safe while being transported to and from school.

The consumers of supported school transport services will be minors, with this service exclusively supporting children and young people to get to and from school. Further, in many cases these young people will be assisted to get to and from school without a parent or guardian present. Accordingly, the providers of supported school transport will be responsible for the young people using their service during the provision of this service. With providers responsible for minors during the delivery of their services, it is crucial that student safety is a primary concern within a new national supported school transport system and that effective safeguards are put in place to protect students.

Under the current supported school transport systems, State and Territory Governments typically provide the service themselves or commission providers to deliver these services. Under this system, Governments are able to engage in a range of practices to ensure student safety such as working screening and training. Under a new system within the NDIS, families will be able to directly engage services of a range of providers. Further, if families are self-managing their NDIS budgets they can engage providers who are not registered with the NDIA. In relation to transport arrangements, this may involve ride share providers and taxi services. While this flexibility, choice and control is positive, it is important that

⁹ Lord, J., & Hutchinson, P. (2003). Individualised support and funding: Building blocks for capacity building and inclusion. *Disability and Society*, 18(1), 71-86.

appropriate mechanisms and safeguards be put in place to maintain student safety under these types of transport arrangements.

Effective Transitioning from the State and Territory Systems

While there are clear benefits to adopting a national supported school transport model under the NDIS, it is imperative that the transition from the current State and Territory systems is effective.

Change can sometimes cause tension and anxiety, particularly if people are unsure about what lies ahead and are concerned that they may not receive crucial support under a new system. To ease these concerns and tensions, people need to be provided with information about the transition to a new supported school transport system and the process of implementing a new system needs to be transparent. People need to know whether current State and Territory systems will remain or whether a new national system will be implemented under the NDIS. If a new system is to be implemented, people need to know what this system will look like, how the new system will differ from current arrangements, whether themselves or their family will be eligible for support under the new system, and what their roles and responsibilities will be within this new system.

Further, service delivery within any new supported school transport system cannot be worse and cannot leave people worse off than the existing State and Territory arrangements. The benefits of implementing a new supported school transport system under the NDIS is that it should bring choice and control to families when engaging this type of service, where under previous systems families had little or no choice over service options. Should a new supported school transport service be implemented, these benefits must be realised. A NDIS supported school transport market must have depth with a range of provider options available to families, and the service options offered by these providers must vary in type, function, quality, and innovation. Thin markets with few providers and limited, traditional, service options will likely offer little benefit over the supported school transport systems currently in place.

In implementing a new supported school transport system, eligibility must also be considered. Students eligible for supported school transport under current State and Territory systems must be eligible under a new nation-wide system. With implementing a national supported school transport service under the NDIS, presumably only NDIS participants will be eligible for this support. However, it is possible that there will be young people across the country that are not eligible for the NDIS but rely on the supported school transport they currently receive from their State or Territory Government to get to and from their school. It is crucial that systems be put in place that support these students accessing school transport despite not being an NDIS participant. It would not be cost effective to run parallel transport systems for NDIS and non-NDIS students.

5 Responses to Questions Posed in the Discussion Paper

It might be prudent at this point to acknowledge that most families want a school transport service that is reliable, on time, efficient and safe so that their child can arrive at school ready to learn. Assuming the above elements to be available, it might then be less important to people whether the school transport service is federally or state funded and whether there is maximum choice and control.

It might be that building the school transport into the NDIS will have greater benefits in the long run. However, this could only be properly contemplated when the NDIS scheme is running in the way it was envisaged. For example, people's views on whether school transport should be included within the NDIS will likely be influenced by their current experience of the Scheme. This might include experiences where the NDIS plan had lapsed, funding was cut, a review was not conducted, and/or where there was not a real choice of services. As a result, it is possible there are stakeholders who do not wish the school transport service to be within the NDIS, because the possible benefits are obscured by these types of difficult experiences.

Also, if the school transport service were based within the NDIS, provision would need to be made for those students who live with disability who are not eligible for an NDIS plan.

Drawing on the principles outlined previously, in this section we respond to a number of the consultation questions in DSS discussion paper.

What works well with the current supported school transport service?

The current supported transport service is controlled by State and Territory Governments. While services differ between jurisdictions, typically the Governments deliver the transport service themselves or they commission a provider to deliver the transport service. These existing services have a number of benefits. State and Territory supported school transport systems are giving young people access to educational opportunities that they may otherwise not have access to. Under the current systems, drivers and people employed as transport aids are typically trained and are often consistent, working the same routes with the same students on a regular basis. This training assists in the provision of specific medical and behavioural supports in situations that require it. Further, the consistency in staff offers familiarity for students and creates an environment where the people involved in transporting the student to and from school know the student and their needs well. Under the current State and Territory systems there are also regulated safety standards and safeguarding mechanisms in place to protect students.

What could be improved?

The current supported school transport services controlled by State and Territory Governments could be improved in a number of ways. Currently, students and families are often passive recipients of supported school transport. State and Territory Governments inform students and families of the transport assistance available to them. Students and

families have very little choice in the type of service they receive and who delivers this service. Further, there is often very little flexibility in the way that supported school transport services are delivered. This system could be improved by giving students and families options in how they can be transported to school and by creating an environment, such as a transport services market, where students and families can exert control over their school transport arrangements. In this type of model, students and families should be able to choose who they will engage school transport services from, which services they will engage and negotiate the details of how these services will be delivered.

Should current arrangements remain?

While clearly there are positive aspects to existing supported school transport systems, the lack of control, choice and flexibility within these current systems is concerning. Accordingly, students and families need to be provided with quality transportation options to access educational opportunities. Current supported school transport arrangements could be adjusted, providing they allow students and families to assert genuine choice and control over their transport arrangements. Alternatively, supported school transport could be remodelled under the NDIS so that students and their families can have choice and control over the school transport supports that they engage.

What are the benefits to families/carers of directly organising supported school transport? What are the challenges? What are the risks?

Within a model of supported school transport delivered through the NDIS, students who are NDIS participants for which supported school transport is deemed reasonable and necessary would presumably receive school transport support within their NDIS budget. These individuals and their families would then directly engage transport providers, paying for supported school transport services through invoice from their NDIS budget. There are a number of benefits to such a system as well as a series of challenges and potential risks.

Such a model would presumably create a service market for supported school transport where new transport providers would enter the market alongside existing transport providers. Students and families would then be able to compare providers as well as the services each of them offer and decide which provider and which services they would like to engage. With providers now competing for business they would likely adopt innovation when developing service options and offer flexibility in these support options. Having such choice and flexibility, as well as innovative service options available, will be of benefit to families, allowing them to structure their transport support creatively and in a way that works best for them.

However, under a supported school transport system delivered within the NDIS, families would largely be responsible for the administrative processes within the system. Families would need to do the research to find suitable providers and investigate each of the service options available. Families would need to compare these providers and their available services, making a decision about which provider and which services they would like to engage.

Families would then need to make service provision arrangements and organise payment for services from their family member's NDIS budget. Such responsibilities could pose challenging for many families. The administration for families within this type of system would be both time consuming and potentially complex.

Another challenge to a supported school transport system within the NDIS is the depth of the transport market. For the model to be effective, there needs to be an innovative transport services market with enough providers and market competition for families to have quality transport options available to them.

The transition period from current State and Territory supported school transport services to a national system under the NDIS may also pose a challenge. If the transition is not facilitated well, families could face disruptions to essential services that allow their children to participate in educational opportunities.

In implementing a supported school transport system within the NDIS there are clear risks around the effectiveness of the new system and its implementation. The implementation of new innovations is often fraught with difficulties.¹⁰ If a national supported school transport system is not implemented in the right way it may not work. Implementing a system that is poorer than previous arrangements would be damaging for students and families and very costly for the Commonwealth Government.

Another potential risk of a system in which families engage the services of transport providers directly, is safeguarding. When individuals and families self-manage their NDIS supports and budgets, they can engage the services of providers who are not registered with the NDIA. While this offers families even more flexibility and choice, it also creates safeguarding concerns. The Quality and Safeguards Commission, the body responsible for quality and safety of NDIS services, has fewer powers when it comes to regulating providers who are not registered with the NDIA compared to those who are. Accordingly, under a system where families are self-managing their supported school transport arrangements, it may pose challenging to safeguard students. This issue of safeguarding is complex as families should be able to experience the dignity of risk when decision making, however the safety of children and young people is crucially important.

What level of flexibility would families be looking for in their supported school transport arrangements?

Each family is different. Families will face different challenges, will live in different environments, and will have different needs and preferences. Families will also differ in the level of flexibility they are seeking in the supported school transport arrangements in place for their child. Some families will want complete control and flexibility, seeking to investigate the different service options available to them and will want to negotiate service agreements with their chosen transport provider, structuring the supports for their family creatively and indi-

¹⁰ Duffy, S. (2006). The implications of individual budgets: Managing Community Care. *Journal of Integrated Care*, 14(2), 3-10.

vidually. Other families will seek less flexibility. They may prefer for someone else to tell them which service they should engage and would rather that all arrangements were made on their behalf. Importantly, too, this preferred amount of flexibility may also vary within families. A family with a kindy aged child living with disability may not seek much flexibility in their supported transport arrangements as they navigate school transportation for the first time. However, after a period of time this family may acquire knowledge of support service options and gain confidence in navigating the processes involved. Over time, this same family may seek much more flexibility in their supported school transport arrangements.

As the level of flexibility sought in supported school transport arrangements will differ between families and within families over time, it is important that any supported school transportation system implemented allows for this variation. Any new system implemented should accommodate families seeking complete flexibility, families seeking no flexibility and all of the families that fall somewhere in between.

How could a transport broker help you manage supported school transport?

In line with families seeking different levels of flexibility within a supported school transport system, families will also vary in the level of assistance they need and want, to function within this new system. Some families may have the time and capacity to completely independently self-manage their child's supported school transport arrangements. Other families may not want to manage these arrangements themselves and others may not have the time or capacity to do so. This variation in the level of assistance different families require when making supported school transport arrangements could be addressed by introducing a third-party delegate available to make school transport arrangements on behalf of families should they choose to engage this service.

This third-party delegate, possibly a transport broker, could assist families by investigating the service options available in the area that would meet the families' needs. The third party could structure transport supports, make support arrangements, and manage the transport supports on behalf of the family, should the family seek or require this type of assistance.

What are the benefits for families/carers of using a transport broker? What are the risks?

Introducing a third-party delegate within a new, national, supported school transport system is important and will have a number of benefits. The way in which this role is enacted will be significant though, as implementing a role like this does come with some risk.

A third-party delegate will benefit families by providing them with the option of having someone take care of researching local school transport options and structuring and managing these support services. A role such as this will make it possible to introduce a supported school transport system based on the values of choice and control by providing a point of contact for families that need or want assistance navigating this system.

The risk of introducing a third-party delegate is that conflicts of interest may arise. A clear conflict of interest would appear, and impartiality would be breached, if the third party is affiliated with a service provider or receives incentives from service providers for recommending their services. To avoid this type of situation, any transport broker or other third-party delegate brought into assist families in their supported school transport arrangements should be independent. They should be impartial and should not be linked with any transport service providers.

Another risk of this third-party role, is that the responsibilities of someone such as a transport broker may map too closely with the responsibilities of a support coordinator. Support coordinators assist NDIS participants with the arrangements for supports funded within their NDIS plan. If the two roles cross over too much families may grow frustrated having to engage both a support coordinator and a transport broker. Families may feel irritated having to tell their story to, and connect with, different people serving a similar role. These irritations may be particularly pronounced should the transport broker role appear redundant and as though it could be included as a responsibility of support coordinators.

Should there be any restrictions over which services can be provided by the transport broker role?

The role of any third-party delegate, such as a transport broker, available to assist families in making supported school transport arrangements, should be impartial and independent. To maintain independence and avoid conflicts of interest, a transport broker should be restricted from brokering services with any transport provider that they are affiliated with and any transport providers that offer them incentives for recommendations to families.

What are the options if no transport broker exists?

If a transport broker role did not exist within a national supported school transport system within the NDIS, perhaps the responsibilities of the potential role could be given to support coordinators instead. In addition to coordinating the other supports within NDIS participants' plans, a support coordinator could also assist families with their supported school transport arrangements.

While it does not necessarily need to be a transport broker, there does need to be a role within a new supported school transport system that is available to assist families in managing their school transport supports. Some families may not need or seek this service but other families will want to engage with this service and some will not be able to make supported school transport arrangements without the assistance. For a supported school transport system based on choice and control to work, this type of assistance needs to be made available to students and families.

What systems need to be in place to make sure that children are safe when travelling to and from school?

Student safety is one of the biggest concerns within a new, national, supported school transport system. While a new system under the NDIS would bring students and families more choice and control, safety may be more difficult to ensure. Currently, under the State and Territory supported school transport systems, the Governments work closely with those delivering school transport systems either because the Governments are delivering the service themselves or because they have directly commissioned a provider to deliver this service. This contact allows for safety mechanisms to be put in place such as worker screening and training and regulated safety standards. Under a supported school transport system within the NDIS, the Quality and Safeguard Commission will take on many of these responsibilities. However, families who choose to self-manage their child's NDIS plan can engage the services of transport providers not registered with the NDIA. The Quality and Safeguard Commission may not be able to wield as much power with providers that are not registered, making it potentially difficult to ensure student safety in these situations.

Accordingly, any new, national, supported school transport system needs to be established in such a way that working screening, training and education are all possible. Mandatory safety standards also need to be in place and these standards need to be regulated. Lastly, effective complaints mechanisms should be in place with a mandatory reporting system for major issues and situations of abuse. Clear protocols or how these complaints and issues will be responded to and dealt with also need to be in place.

What responsibilities should transport brokers and transport providers have to keep children safe? What should be the responsibilities of parents and schools?

As student safety is so crucial, any national supported school transport system developed needs to clearly outline the responsibilities of any third-party delegate involved such as a transport broker, transport providers, schools and families.

Third-party delegates such as transport brokers should be responsible for brokering services and recommending transport providers that they know to be high quality. Transport brokers should not recommend the services of providers who have a history of breaching safety standards.

Transport providers have a clear responsibility for the safety and well being of the students in their care during the provision of services. Providers have a responsibility for delivering a quality, appropriate, and reliable service. Providers should also be responsible for ensuring that they transport the correct student to and from the correct residential address and school. Transport providers should also respond to incidents that occur during provision of their services in an appropriate manner.

Families should be responsible for the safety and wellbeing of their child up until the transport service has commenced and their child has been collected by the transport provider. Families should also be responsible for meeting the transport provider at a designated location and time after the return transport trip from school is complete.

Schools should be responsible for students from the point that the transport provider arrives at the school until once the transport provider leaves the school premises with the students.

Transport brokers, transport providers, families and schools should all be responsible for reporting breaches to standards, incidents, and any abuse that occurs in relation to supported school transport services.

What are the benefits to families of managing provider payments themselves? What support would be helpful in managing this?

Within the NDIA, individuals and families have the opportunity to independently self-manage their NDIS budgets and manage provider payments themselves. Self managing provides families with the opportunity to engage the services of providers that are not registered with the NDIA. This gives families more options and choice and it also means that families can be creative and innovative with the way that they structure supports.

The other benefit of families managing provider payments themselves is that budgets will perhaps go further if part of the participant's funding does not need to be spent on support coordination type services.

A number of supports could be of help to families managing provider payments themselves. The provision of information is crucial. It would be helpful for families to have access to information about all aspects of self managing their supported school transport arrangements. This may include information about transport service options available, information about strategies that can be used to compare transport providers and service options, and tips for negotiating with transport providers and engaging services. Families could be provided with information about making payments and any other processes involved. Families should also be made aware of the mechanisms available to make complaints and notify of breaches of standards and well as their rights and responsibilities within the system.

In addition to providing families with information, opportunities for capacity building could also be helpful. The capacity of families to independently navigate a supported school transport system could be built through providing in-person workshops and webinars for families. A contact phone number that families could call to access assistance and advice on navigating the supported school transport system could also be helpful. Additionally, the introduction of an eMarket where families can gain information about transport providers and services in their area as well as reviews of services by other families could also be of benefit.

How does the potential model improve on the current arrangements for supported school transport?

The proposed introduction of a national supported school transport system within the NDIS improves on the current systems in place in States and Territories by offering students and families more choice and control over the school transport supports in their lives and more

flexibility in the ways that these supports are structured. Under previous welfare type social systems, people living with disability have often been forced to be passive recipients of Government provided or commissioned support. People have experienced very little control over the crucial supports in place in their lives and have had very little opportunity to choose what supports they receive and who they are delivered by. The NDIS, if implemented well, will bring choice and control to hundreds of thousands of Australians living with disability when arranging many of the supports in their lives. School transport supports should be no different. Students and families deserve choice and control over their travel arrangements to and from school, and freedom and flexibility to structure these supports in the way that is best for them.

6 Opportunities to Implement School Supported Transportation within the NDIS and Recommendations

We thank the Commonwealth Government for the opportunity to provide feedback about supported school transport and for considering this feedback. We also commend the Commonwealth Government for considering implementing supported school transport within the NDIS.

Below, we present a series of recommendations regarding the implementation of supported school transport in Australia.

Education is a right that should be afforded to every Australian child and young person and all students should be supported to access this education. Supported transportation to and from school should be made available for students living with disability who require this support to be able to participate in education.

Recommendation 1:

Students living with disability that require supported transportation to access education should be able to engage this assistance through a supported school transport system.

The introduction of the NDIS allows people living with disability more choice and control over their lives and the supports that they engage. The NDIS also provides more opportunity for people to structure their supports flexibly, creatively and in a way that best matches their needs and preferences. By implementing a new, national, supported school transport system within the NDIS, students and their families should have greater choice and control over the provider of their school transport and the specific transport services that they engage. Such a system should offer benefits over current State and Territory supported school transport systems where families are often passive recipients of Government provided or commissioned transport services.

Recommendation 2:

A new, national, supported school transport system should be implemented within the NDIS. This new system should offer students and families more choice and control in sup-

ported school transportation, as well as flexibility in the ways in which school transportation supports are structured.

The benefits associated with a new, national, supported school transport system, such as choice, control and flexibility, must be realised. Students should not be worse off under a national supported school transport system than they are under current State and Territory arrangements. Further, systems must be put in place to ensure that all students who currently rely on State and Territory supported school transport arrangements, to get to and from school, have access to any national system that is implemented regardless of whether they are NDIS participants or are eligible for the NDIS.

Recommendation 3:

Any new, national, supported school transport system should be implemented in a way that brings benefits to students and families. Students should not be worse off under a new national supported school transport system than they are under current State and Territory based arrangements. Additionally, mechanisms should be put in place to ensure that all students who currently rely on supported school transport through State and Territory systems have access to supported school transportation under a national system regardless of whether they are NDIS participants.

If a new, national, supported school transport system is to be implemented, the period of implementation is critical. The transition between current State and Territory supported school transport systems and a national system within the NDIS must be transparent. Students and families should have access to information about the new system and eligibility criteria, should understand how the new system differs from previous systems and should understand their roles in the new system.

Recommendation 4:

The implementation of any new supported school transport system should be both consultative and transparent. Students and families should be provided with clear information about whether the supported school transport system will change, what changes will take effect, eligibility under the new system and any other information that will reduce tensions and provide piece-of-mind during the transition period.

Control, choice and flexibility under a new, national, supported school transport system within the NDIS is positive. However, this flexibility and choice may lead to families engaging the services of transport providers that may not have the same level of training and may not be subjected to the same level of background checks as workers delivering supported school transport under current State and Territory systems. Accordingly, appropriate and effective safeguards must be put in place to ensure student safety while being transported to and from school.

Recommendation 5:

Appropriate and effective safeguards should be built into any new, national, supported school transport system that is implemented. Students must be transported to and from school in an environment that is both safe and secure.

Providing students and families with the opportunity for choice and control when structuring their supports is critically important. However, some students and families may not want to, or may not be in a position to, research support options and manage support arrangements. Accordingly, while it is important to provide people with the opportunity to assert choice and control, it is equally important to provide supports to assist people in navigating a service market and making decisions and arrangements. This assistance could be provided by an independent third party that students and families could choose to engage the services of. It is imperative that any third party made available to assist families in structuring school transport supports is independent and not linked to any transport service provider to avoid conflicts of interest.

Recommendation 6:

A third party should be introduced to assist students and families in identifying suitable school transport services, structuring school transport supports and managing associated arrangements. This third party should be available to students and their families eligible for supported school transport, should they seek to engage this type of assistance. The third party should be impartial and independent from transport providers to avoid conflicts of interest.

For further information about this submission, please contact:

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