



Education Report: Updated advice on options for school transport assistance for ineligible students where there is existing spare capacity

To:	Hon Chris Hipkins Minister of Education		
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Purpose of report

This report provides further advice in response to several requests from Ministers for options to provide school transport assistance for ineligible students where there is existing spare capacity.

Summary

- In November 2019, Minister Salesa commissioned advice from the Ministry about a possible change to school transport eligibility criteria under the following circumstances:
 - where students are attending their nearest school, but are ineligible for school transport as they live within distances specified in the policy (3.2 kilometres for years 1-8 students or 4.8 kilometres for years 9-13 students);
 - if a school bus service already exists and the potential stops are on the route;
 - where there is available spare capacity on the bus; and
 - where there are reasonable concerns about the safety of the students getting to school (e.g. open roads with no footpaths).
- On 13 January 2020 [METIS 1212770 refers], we provided advice indicating risks with this approach. We recommended that Ministers did not proceed with this option, given its significant implications and risks. The Ministry recommended that if Ministers wished to make changes to the eligibility criteria for school transport assistance then a review of the long-standing school transport assistance policy would be the most suitable option.
- In response to our advice, you asked for further advice on an option for providing transport assistance to ineligible students using existing spare capacity that didn't include the criterion where students must have a reasonable safety concern.

4. At a meeting with Ministry officials in February 2020, Associate Ministers Davis and Martin indicated their interest in the option with the safety aspect included and requested more detailed advice, including advice on how it could be implemented quickly (that is, without a comprehensive review of the school transport assistance policy).
5. These requests were deferred by your Office as a result of competing Covid-19 priorities and were later revived by your Office in April 2021. We provide in this paper the two options requested by Ministers for broadening the scope of transport assistance to include currently ineligible students without increasing currently available capacity:
 - Option A: carry ineligible students on existing services where there is available capacity; and
 - Option B: carry ineligible students where there is available capacity, and reasonable safety concerns for a student in getting to school.
6. We also present two further options:
 - Option C: a comprehensive review of current school transport assistance policy and eligibility. This option would likely require changes to current service levels; and
 - Option D: maintain the status quo, where transport operators may carry ineligible students if they have capacity and the desire to do so.
7. While Options A and B may enable some ineligible students to access school transport assistance without increasing current levels of capacity, the Ministry does not recommend either Option A or B as these options are unlikely to deliver consistent and reliable services to students facing significant barriers to education.
8. The Ministry recommends a comprehensive review of the school transport assistance policy (Option C) if you wish to broaden the provision of school transport assistance. This would provide an opportunity to reconsider the Ministry's approach to delivering transport assistance in light of current education priorities, such as attendance and ensuring barrier-free access to education.
9. A review would allow us to ensure that policy settings for school transport assistance support the Ministry's core purpose of delivering equitable and excellent outcomes, using evidence to ensure that any changes deliver improved outcomes for ākonga. It would also allow any risks associated with changes to be identified and mitigated.

Recommended actions

- a. **Note** that the Ministry has previously advised Ministers against creating exceptions to existing school transport assistance policy and recommended that if Ministers want to make changes to current settings and eligibility criteria, then a formal review of current school transport assistance policy would be the most effective option.

Noted
- b. **Note** that while transport providers may elect to carry ineligible students at their discretion, providers may charge these students a fare, limiting the affordability of services for some whānau; and that many providers are choosing not to carry ineligible students from January 2022, or to discontinue existing discretionary arrangements.

Noted

- c. **Note** that Ministry-funded bus routes are designed to maximise the use of available capacity to carry eligible students, and therefore an optimally designed bus route would have little or no spare capacity; and that, under new contracts commencing in January 2022, if ineligible students are present on a service then all students (whether eligible or ineligible) must be seated.

Noted

- d. **Note** that the Ministry has considered two options requested by Ministers for providing school transport assistance to ineligible students without increasing current capacity:

- **Option A:** Allow ineligible students to use school bus services where there is existing spare capacity; and
- **Option B:** Allow ineligible students with reasonable concerns for getting to school safely to use school bus services where there is existing spare capacity.

Noted

- e. **Note** that **Option A** would enable some additional ineligible students to access school transport assistance without paying a fare, but includes several significant disadvantages, including inconsistent service provision, possible exclusion of eligible students, and increased use of standing capacity on existing services.

Noted

- f. **Note** that **Option B** would require a moderate amount of funding to design and implement but may result in inconsistent or uncertain service provision to ineligible students, and may not adequately address the needs of all students with legitimate safety concerns.

Noted

- g. **Note** that mandating the use of spare capacity to carry ineligible students (**Options A and B**) will enable some additional ineligible students to access school transport assistance, but that the Ministry does not recommend these options as they are unlikely to reduce barriers to access consistently and effectively or deliver on the expectations of communities, schools and caregivers.

Noted

- h. **Note** that the Ministry recommends a review of current school transport assistance policy (**Option C**) if you wish to broaden the provision of school transport assistance, as a review would enable the Ministry to identify changes that could effectively reduce barriers to education and deliver tangible benefits for ākonga.

Noted

- i. **Agree** to one of the following four options:

- **Option A:** Allow ineligible students to use school bus services where there is existing spare seated capacity;

Agree **Disagree**

- **Option B:** Allow ineligible students with reasonable concerns for getting to school safely to use school bus services where there is existing spare seated capacity;

Agree **Disagree**

- **Option C:** Comprehensive review of school transport assistance policy; or

Agree **Disagree**

- **Option D:** Maintain the status quo, where school transport providers may carry ineligible students where they have capacity and a desire to do so.

Agree ☒ Disagree

j. **Agree** that this briefing will be proactively released after Ministerial consideration.

☒ Agree / ☐ Disagree



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2/12/2021



Hon Chris Hipkins
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13/12/2021

Background

Eligibility criteria for school transport assistance

1. The Ministry provides transport assistance to students where distance or lack of suitable public transport present a barrier to education. Through a range of services, the Ministry assists 100,000 students to and from their places of learning each school day. In 2020/21, services for eligible students were funded from an annual appropriation of \$221 million.
2. The Ministry delivers or funds transport assistance through several distinct commercial and funding arrangements:
 - Daily Bus services (taking students to and from school through services provided by commercial transport bus operators);
 - Technology Bus services (transport for year 7 and 8 students to access technology facilities);
 - Direct Resourcing (bulk funding provided to schools to arrange transport for eligible students);
 - Te Kura Kaupapa – Māori Medium Schools (transport funding provided to kura to arrange transport for eligible students);
 - Specialised School Transport Assistance (funding for students with safety or mobility needs who require additional assistance); and
 - Conveyance Allowances (funding provided directly to caregivers to assist with transport costs where the Ministry cannot provide a vehicle service).
3. In general, students must meet the following criteria to be eligible for school transport assistance:¹
 - The student must attend the closest state or state integrated school where they can enrol;²
 - The student must live at least 3.2 kilometres from school (for years 1-8 students) or at least 4.8 kilometres from school (for years 9-13 students); and
 - There must be no suitable public transport options.

Advice requested and provided to date

4. On 4 November 2019, Minister Salesa commissioned advice from the Ministry about a possible change to school transport eligibility criteria under the following circumstances:
 - Where students are attending their nearest school, but are ineligible for school transport as they live within distances specified in the policy (3.2 kilometres for years 1-8 students or 4.8 kilometres for years 9-13 students); and
 - If a school bus service already exists and the potential stops are on the route; and
 - Where there is available spare capacity on the bus; and

¹ Eligibility for Specialised School Transport Assistance is based on the safety and/or mobility needs of the student rather than distance from the closest school. Intermediate schools are entitled to technology bus services if they are at least 2 kilometres away from the nearest school that has the appropriate technology facilities.

² For students attending Māori Medium Schools, whichever Māori Medium School is chosen will be considered the closest (in recognition of the importance of iwi and hāpu affiliation to a Māori-medium education).

- Where there are reasonable concerns about the safety of the students getting to school (e.g. open roads with no footpaths).
5. On 13 January 2020 [METIS 1212770 refers], we provided advice indicating the risks and implications of this option. The risks and implications included:
- Determining whether there are reasonable safety concerns for ineligible students to make their way to or from school would be extremely challenging to do in a way that is objective and applied consistently across the whole country;
 - The option would create an arbitrary limitation (can only travel if there is sufficient spare capacity) that would be very difficult to defend given it goes directly against the Ministry's traditional and unconditional provision of school transport assistance to all eligible students;
 - There would be no guarantee of a place on the bus unless there is spare capacity (and an optimally designed and serviced bus route would have none), so the option would not likely deliver on the expectations of Ministers, schools, students and whānau;
 - The rationale for the changes would also arguably apply to school transport assistance beyond Daily Bus services (i.e. funding provided for Direct Resourcing, Māori Medium Schools and Conveyance Allowances) given the possibility of reasonable safety concerns for students not eligible for these types of assistance;
 - Designing and implementing the option would be a significant task that would require reprioritisation of existing Ministry resources and staff time.
6. In this initial advice, we recommended that Ministers did not proceed with this option, due to its significant implications and risks. We recommended that if Ministers wanted to explore changes to the school transport eligibility criteria then a formal review of school transport assistance policy was the best means of achieving this.
10. In response, you asked for further advice on an option for providing transport assistance to ineligible students without increasing currently available school transport capacity that didn't include the criterion where students must have a reasonable safety concern.
7. At a meeting with Education officials in February 2020, Associate Ministers Davis and Martin indicated their interest in an option with the safety criterion included and they requested more detailed advice on this option and how it could be implemented quickly (that is, without a comprehensive review of current school transport assistance policy).
8. These advice requests were deferred by your Office as a result of competing Covid-19 priorities. They were later revived by your Office in April 2021. In this paper, we provide advice to address the various requests we have received.

Some ineligible students receive transport assistance under private arrangements

9. We allow Ministry-contracted bus companies to make private arrangements with caregivers at their discretion to transport ineligible students where there is excess capacity. To ensure that these arrangements do not negatively impact eligible students, our current contracts only allow providers to carry ineligible students if:
- there is seating capacity available for all students on the service;

- the presence of ineligible students does not disadvantage eligible students (e.g. journey delays or lack of seats);
 - the affected schools give consent; and
 - a fare is paid (determined by the operator).
10. Under new contracts commencing in January 2022, a fare may be charged, but this is not a requirement. Where transport providers decide to charge ineligible students a fare, this may be a 'peppercorn charge' or could be a fully commercial fare, and the amount of the fare and method of payment is determined solely by the transport provider. Under current and new contracts, the Ministry is not able to influence fares set by transport providers or ensure that they are affordable for all whānau.
11. The Ministry does not have oversight of the number of ineligible students using school transport through these discretionary arrangements. However, through our engagement with schools and providers in the lead-up to the commencement of new contracts in 2022, we understand that many new and incumbent transport providers are deciding not to carry ineligible students as these arrangements are not commercially viable (due to additional seating requirements) or carry commercial and operational risks.

Spare capacity on Daily Bus services

12. New contracts for Daily Bus services have been secured and services will commence at the start of Term 1 in January 2022. The capacity for each service was determined by adding a 10% 'buffer' to the number of eligible students expected to use each route at March 2020. Under the new contract, eligible students must be provided with a seat. This means that the new contract can accommodate a 10% increase in student numbers on each route (compared to the March 2020 number) before additional costs are incurred or standees may be required.
13. The new contract includes a rule that if ineligible students use a Ministry service, all students must be seated. This rule removes the need for drivers to enforce seating for eligible students by requiring ineligible students to stand. However, the Ministry has maintained some flexibility in the contract to allow some eligible standees if the alternative to this is that eligible students lose a place on the bus. In this scenario, our principle that no student who requires transport misses out on assistance takes priority over our preference for no standees.
14. An optimally designed bus route would have little or no spare capacity. The purpose of the 10% additional capacity is to accommodate some change in the number of eligible students on each route between March 2020 and the beginning of the contract. We expect that a small number of routes may already be over-subscribed by the time newly contracted school transport services start.

Options for providing school transport assistance to ineligible students without increasing current capacity

15. The Ministry has considered two options requested by Ministers for providing school transport assistance to ineligible students without increasing current capacity:
- Option A: Allow ineligible students to use school bus services where there is existing spare capacity; and
 - Option B: Allow ineligible students with reasonable concerns for getting to school safely to use school bus services where there is existing spare capacity.

16. We also present a third option, Option C: a review of the school transport assistance policy. This option may result in changes to currently available levels of school transport capacity. A fourth option is to maintain the status quo (Option D).

Option A: Allow ineligible students to use school bus services where there is existing spare capacity

17. In this option, the Ministry would direct transport providers to pick up all ineligible students that their existing service has spare seating capacity for on any given day. Ineligible students who wish to use the service would need to make their way to the nearest bus stop on an existing route. This would reduce the impact of the change on eligible students and minimise the inefficiencies and costs that could be incurred from longer journey times. Requiring that ineligible students make their way to an existing stop would also reduce the administrative burden associated with siting new bus stops.
18. To manage caregiver and student expectations, schools and transport providers would need to communicate clearly that, on any day when a service is at full capacity, ineligible students will not be able to use the service.³
19. Under this option, ineligible students would no longer need to make private arrangements with transport providers and would no longer be required to pay a fare to use existing services. There would also be no requirement that transport providers receive consent from affected schools before carrying ineligible students. This would allow the Ministry and transport providers to better utilise capacity and to carry as many students (both eligible and ineligible) as possible without increasing current service levels.

Option B: Allow ineligible students with reasonable concerns for getting to school safely to use school bus services where there is existing spare capacity

20. This option would operate through a formal application process where school Boards would submit applications on behalf of students to the Ministry. These applications would be assessed by Ministry staff against a set of criteria to determine whether students are unable to access any other form of transport (e.g. lack of public transport, parents/caregivers cannot drive students) and whether there is a reasonable safety concern for them in travelling to and from school. Reasonable safety concerns could include walking on roads with no footpaths and open roads with high speed limits.
21. It would be necessary to perform an on-site assessment of a student's route to school to determine whether it meets the safety criteria. This assessment would most likely need to be carried out by subject matter experts.
22. This option would include some of the same conditions as Option A, namely:
- Ineligible students would not be able to use the service when capacity is full; and
 - Ineligible students would not need to pay a fare.
23. A key difference to Option A would be that, as student safety is the impetus, transport providers and students/caregivers could agree to set up additional bus stops for students with a reasonable safety concern. It would be at the transport providers' and schools' discretion to decide whether an additional bus stop is needed, based on a reasonable assessment of how far a student with a safety concern would have to travel to get to the nearest existing bus stop.

³ This rule would not be enforceable in the current operating environment, as bus drivers have no formal method of distinguishing eligible students from ineligible students. The Ministry may need to consider a ticketing programme if this option is progressed.

Option C: Comprehensive review of the school transport assistance policy

24. If you wish to explore broadening the school transport assistance eligibility criteria, a comprehensive review of current school transport assistance policy would be the most effective option.
25. A review would examine the current criteria to determine whether they are fit for purpose and remain effective in addressing barriers to education. As these barriers are experienced unevenly across New Zealand, this review may provide an opportunity to deliver greater responsiveness to local circumstances (such as socio-economic conditions) and provide support that reflects the specific needs of students, schools/kura, and the wider sector. This option would also enable us to identify and assess the costs, risks and benefits of making changes. Implementation of any changes would need to be carefully designed so that any associated risks could be mitigated.
26. A thorough review of our school transport assistance policy would be a significant exercise and the Ministry may need to seek additional operational funding or defer existing work programmes in order to carry it out within its current baselines. In addition to this, you would need to seek Cabinet's sign off on any changes resulting from the review, and would probably require additional funding from future Budgets to implement these changes (which are likely to include increasing the scale of our school transport assistance provision).

The default option: Maintaining the status quo

27. The default option is to maintain the status quo, where school transport providers offer transport to ineligible students where they have capacity and a desire to do so. The status quo practice is an efficient method for delivery of school transport assistance to some ineligible students where there is demand and spare seating capacity on existing services, and where providers are willing to carry ineligible students.

Assessment of options against criteria

28. The following table (p. 10) assesses the options against the following criteria:

- cost
- efficiency
- equity
- time (to implement).

Options for providing transport assistance to ineligible students

	Option A: Allow ineligible students to use school bus services where there is existing spare capacity	Option B: Allow ineligible students with reasonable concerns for getting to school safely to use school bus services where there is existing spare capacity	Option C: Comprehensive review of current school transport assistance policy
Cost⁴	<u>Low Cost</u> <ul style="list-style-type: none"> This option will not incur extra cost, as it involves utilising spare capacity of existing services This option may require investment in a passenger boarding system to differentiate between eligible and ineligible students in order to ensure demand for services (and therefore costs) are not inflated by ineligible students. If this is the case, this option will become medium/high cost. 	<u>Medium/High Cost</u> <ul style="list-style-type: none"> This option is likely to require a moderate amount of funding for its design and implementation, including for: <ul style="list-style-type: none"> ➢ Design of the applications assessment framework and process ➢ Engagement of experts for on-site road safety assessments ➢ New Ministry staff to assess applications Extra cost may be incurred by increase in driver hours and additional administrative burden arising from assessing new bus stops 	<u>Medium/High Cost</u> <ul style="list-style-type: none"> The Ministry would be required to reprioritise other core business activities or seek new operational funding to undertake a review Depending on the outcome of the review, more funding and resource would likely be required to design and implement the changes A policy review would ensure that existing resources are used effectively to meet the needs of students and communities
Efficiency	<u>Low/Medium Efficiency</u> <ul style="list-style-type: none"> It is efficient to utilise the spare capacity on services where there is demand As optimally designed routes would have little spare seating capacity, this option may result in relatively few ineligible students gaining access to school transport assistance Removing the “no standees” requirement would help to utilise full capacity, though this would be a significant reversal in policy and carry considerable risk of caregiver/community dissatisfaction This option builds on a status quo practice and therefore requires minimal adjustment 	<u>Low Efficiency</u> <ul style="list-style-type: none"> It is efficient to utilise the spare capacity on services where there is real need Maintaining the “no standees” requirement and allowing transport of ineligible students with safety concerns would have the unintended consequence of reducing the overall capacity of the network An application process would save the Ministry effort in conducting universal road safety assessments Significant investment of time and effort required to approve applications, conduct on-site road safety assessments and bus stop siting safety assessments 	<u>Medium Efficiency</u> <ul style="list-style-type: none"> This option ensures that outcomes sought are clear and any interventions correctly target existing problems and barriers to access A policy review would assist in making the case for the new initiative Budget funding that would be required to implement any changes It is efficient to review the transport assistance eligibility criteria before making changes which may not effectively deliver the outcomes sought by Ministers

⁴ We are not able to provide more detailed cost estimates for these options until they are formally designed.

	<ul style="list-style-type: none"> Provision of transport for ākonga may not be reliable, because it would depend on the availability of a seat from day to day 	<ul style="list-style-type: none"> It would take Ministry staff significant time and effort to design the framework and safety criteria 	
Equity	<u>Low Equity</u> <ul style="list-style-type: none"> This option could provide transport to students who want to use public transport, but cannot afford the fare Ineligible students would be able to use spare capacity on existing services at no cost There is no certainty for ineligible students that they will receive school transport assistance on any given day; and seats will be available on a first-come first-served basis There is no instrument to determine prioritisation of ineligible students based on their needs and specific circumstances Eligible students could lose their seat/space on the bus to ineligible students, as bus drivers currently have no method of distinguishing eligible students from ineligible students 	<u>Low/Medium Equity</u> <ul style="list-style-type: none"> Evidence-based decisions on individual safety needs would be made, ensuring assistance is provided in a way that is equitable and responds to real need Some students may have reasonable safety concerns that do not meet our criteria May create uncertainty or confusion among caregivers and communities about the level of support available to all students There is no certainty that students with a reasonable safety concern will receive school transport assistance on any given day, leading to compromised safety and attendance outcomes 	<u>High Equity</u> <ul style="list-style-type: none"> A thorough review would ensure that any change to eligibility criteria is evidence-based and equitable A review would enable the Ministry to align its eligibility criteria and school transport assistance policy with current education priorities, including equitable outcomes and barrier-free access
Time	<u>Short timeframe</u>	<u>Medium timeframe</u>	<u>Long timeframe</u> <ul style="list-style-type: none"> It is unlikely that any changes resulting from a review will be implemented within the next 2 years

Risks and implications associated with options

Option A: Allow ineligible students to use school bus services where there is existing spare capacity

29. This option would be an effective and low-cost means of utilising spare capacity to provide school transport assistance to some ineligible students, even if students do not have a reasonable safety concern.
30. As ineligible students would no longer need to pay a fare to access services with spare capacity, this option may improve the affordability of transport for some whānau and would ensure that lack of funds does not prevent ineligible students from accessing Ministry-funded services where there is existing spare capacity.
31. There is a significant risk that this option may not deliver a consistent and reliable service to ineligible students, as there would be no certainty that ineligible students would be able to use a service on any given day. For this reason, this option may compromise the overall consistency and reliability of services and, as a result, may not effectively reduce barriers to access or meet caregiver or student expectations.
32. Inconsistencies in service provision may also negatively impact student attendance in the short term, as it would be impossible for caregivers and students to know in advance whether they will be able to utilise a service. This uncertainty may present considerable challenges for some caregivers and students, especially in areas where caregivers must transport their child to the nearest pick-up/drop-off point on an existing route. This may in turn create a safety risk in some cases.
33. There is also a risk that eligible students will lose their seats or place on the bus to ineligible students, as there is currently no mechanism for bus drivers to distinguish eligible and ineligible students.
34. Without a reliable mechanism for distinguishing eligible and ineligible students (such as a ticketing or passenger boarding system), it is possible that all students will be counted as eligible by transport providers, leading to additional costs associated with inflated demand. From January 2022, providers are required to report persistent shortfalls in seating capacity to the Ministry so that the Ministry can manage demand and provide additional capacity (if necessary) to meet demand from eligible students. Lack of a reliable mechanism for tracking eligible student patronage could present a significant issue and lead to a significant increase in costs for some services.⁵
35. This option may deliver more consistent and reliable services to ineligible students if the Ministry were to remove the rule that services carrying ineligible students must provide seating for all students. Removing this rule would increase spare capacity and enable greater numbers of ineligible students to access services. However, this would contradict the Ministry's and the Government's earlier decision to reduce the numbers of standees on school buses. It would also be a significant reversal in policy, and a range of parties (including parents/caregivers) are invested in this issue and are likely to challenge a reversal.
36. This option may also generate opposition from transport providers, who would no longer be able to charge ineligible students a fare.

⁵ It would be difficult to incentivise students to use a ticketing system, as our principle that 'no child is left behind' would mean that bus drivers would not be able to deny a place on a bus to eligible students who are not carrying a ticket.

Option B: Allow ineligible students with reasonable concerns for getting to school safely to use school bus services where there is existing spare capacity

37. This option would allow the Ministry to use spare capacity to address the reasonable safety concerns of students and caregivers, even where students do not meet the standard eligibility criteria for school transport assistance. It would provide an adaptable framework for addressing the genuine concerns of communities about the ability of students to access education safely.
38. However, as with Option A, this option may not deliver a reliable and consistent services to ineligible students, as there would be no guarantee that spare capacity would be available on any given day. Offering a conditional form of assistance to ineligible students with considerable safety concerns (i.e. only when there is spare capacity) would be problematic, as the rationale for this option is to improve student safety outcomes and enable greater responsiveness to local conditions and the circumstances of individual students.
39. The Ministry is not qualified to make road safety assessments, or to set all-inclusive criteria for student safety outside its services. Even with the support of external experts, there is a risk that any criteria may exclude students with legitimate safety concerns or otherwise fail to adequately address the safety concerns of caregivers and communities.
40. The rationale for providing transport assistance to ineligible students with reasonable safety concerns would also arguably apply to school transport beyond Daily Bus services (i.e. Direct Resourcing, Māori Medium funding, and Conveyance Allowances). However, as the Ministry has limited involvement in services contracted or provided directly by schools and kura, this option may lead to significant inconsistencies in the application of current eligibility criteria across services. Inconsistent application of the eligibility criteria across all services could lead to substantial inequities in the provision of school transport assistance.

Option C: Comprehensive review of the school transport assistance policy

41. There is a minor risk that a comprehensive review is not necessary, and that in carrying one out we will be diverting resources away from other priorities in the Ministry's work programme.
42. While some investment of time and resources will be required a policy review, this review would also help to ensure that the Ministry's current appropriation for school transport assistance delivers effective services to students and meaningfully supports the Ministry's core objectives of equity and excellence.

Conclusion

43. We have provided you with three options to expand the provision of school transport assistance for ineligible students: two options for providing school transport assistance to ineligible students where there is available spare capacity on existing services; and an option to review current school transport assistance policy.
44. It is the Ministry's view that using spare capacity to transport ineligible students (Options A and B) without increasing school transport capacity would not provide demonstrable benefits to ākonga who do not currently have access to school transport assistance. As bus routes are optimised to maximise the use of available capacity, these options would likely result in only a modest increase in the number of students who are able to access school transport assistance. As a result, these options are unlikely to significantly reduce

remaining barriers to access or meet the expectations of schools, caregivers or communities.

45. There is a high level of risk associated with providing school transport assistance to ineligible students with a reasonable safety concern in getting to school, as this would require the Ministry to assess student safety outside its bus services. There is also a risk that this option may exclude some students with legitimate safety concerns.
46. There is also a moderate level of risk if we remove the current rule where all students must be seated on a service that carries ineligible students. Although this would enable us to better utilise existing capacity (by filling buses to the maximum legal limit) and provide more consistent service to ineligible students, this would be a significant reversal of the earlier position of restricting standees.
47. Carrying out a comprehensive policy review (Option C) would ensure that the most evidence-based and equitable approach is taken to deliver consistent and effective transport assistance to students where there is real need. This option would enable the Ministry to identify the key issues with the existing system and determine the most effective solutions. A review would ensure that any changes will deliver tangible benefits to ākonga who currently face barriers to education due to distance and accessibility and would enable the Ministry to align its school transport assistance policy with current education priorities. We recommend this option if you wish to broaden the scope of our current school transport provision.
48. Our status quo practice, where we allow school transport providers to transport ineligible students where they have capacity and a desire to do so, is an efficient and cost-effective method of delivering transport assistance to some ineligible students where there is demand. However, transport providers may charge ākonga a fare under these arrangements, limiting the affordability of services for some whānau.

Proactive Release

49. We recommend that this briefing is proactively released after Ministerial consideration.