



General Synod Board of Education of the Church of Ireland (Republic of Ireland)

Submission to the Department of Education
Review of the School Transport Scheme

February 2022

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1. Introductory Remarks – The Role of School Transport

The Board welcomes this opportunity to make a submission on this current review of the role, function and operation of the School Transport Scheme. As the recognised management body for Boards of Management for primary schools under Church of Ireland patronage, observations made in this submission relate to the operation of the School Transport Scheme at primary level. However, much of the observations are equally applicable to the operation of the scheme at post primary level also. The Board notes that the role of school transport has taken on a broader policy significance for Government in relation to the support for rural Ireland than was recognised in previous submissions on the School Transport Scheme in 2009 and 2013. It is also noted that the broader environmental context for the importance of public transport has moved forward into the forefront of the minds of policy makers in more recent years. The School Transport Scheme remains an essential infrastructural support for schools at both primary and post-primary level and is of specific importance to schools under the patronage of the Church of Ireland (and other schools under the patronage of Protestant churches).

The Board, in this submission, will give specific attention to the importance of the continuation of the School Transport Scheme in supporting and sustaining religious diversity in rural Ireland. The Board is glad that the recently published ‘Our Rural Future; Rural Development Policy 2021-2025’ recognises the essential nature of the School Transport Scheme to the communities of rural Ireland – including schools. The Board welcomes also the opportunity to provide some specific observations on the operation of the school (while recognising that school Boards of Management are best placed to give detailed observations on specific operations of the Scheme.

2. Importance of the Provision of School Transport

The provision by the State of a subsidised school transport system is an essential resource to achieve the effective implementation of a range policy objectives. In the first instance, subsidised school transport enables children who live a distance from school, to access education in a safe and efficient way. The subsidised nature of the school transport scheme promotes equality of opportunity for children and young people to access education and is therefore a key provision in tackling inequality and disadvantage. The availability of subsidised school transport also provides for the sustainability of rural primary schools which might otherwise be unsustainable, thereby removing an essential educational provision and undermining a key policy objective contained in the vision set out in ‘Our Rural Future’¹, recently published by Government. The Board notes that the vision statement in ‘Our Rural Future’ takes a broad, positive and supportive view in regard to the future of life in rural Ireland and states that:

‘Our vision is for a thriving rural Ireland which is integral to our nation economic, social, cultural and environmental well-being and development, which is built on the interdependence of urban and rural areas, and which recognises the centrality of people, the importance of vibrant and lived in places, and the potential to create quality jobs and sustain our shared environment’. (Our Rural Future. Rural Development Policy 2021-2025, pp.7).

School transport is therefore an essential practical infrastructural support in achieving this vision. ‘Our Rural Future’ sets out a vision for rural Ireland that is aimed at rejuvenation through investment. The Board agrees with the identification of the provision of subsidised school transport as a part of that investment.

¹ ‘Our Rural Future’. Rural Development Policy 2021-2025’. Government of Ireland (2020).

3. Child-centred approach

The Child is at the centre of all our schools. Schools are about children! The safe transportation of children to and from school is a concern of all involved in the provision of education. In rural areas, particularly in the seasons of poor weather and poor visibility, the availability of safe transport to and from school is greatly valued. In conducting its review of the efficiencies of the school transport system, the Board urges that Department of Education not to place economic efficiencies as the ultimate priority or decision maker, but rather to balance economic efficiencies with the need to ensure that children continue to have access to safe transport to and from school.

The Board has also considered the safety of children while travelling on the school bus and considers it appropriate that this review of the scheme should include of safety practice and procedure in relation to on-board bus safety. In this connection, the Board suggests that training for school bus escorts and drivers should also be reviewed and developed further.

4. Economic Importance of the School Transport Scheme

In considering the economic aspects of the provision of school transport, it is noted that the cost of school transport is a significant expenditure and is in the region of €200 million annually², representing approximately 2% annually of all expenditure on education and increases annually due to the rising associated costs.³ The Board is also mindful that there is a duty upon the State to ensure that the school transport service is run in an efficient manner to ensure that value for money is achieved and maximised. However, the cost of providing subsidised private school transport is also costly, and, as mentioned, the policy objective of achieving equality of access to school can only be achieved through the provision of State subsidised school transport. Wider policy objectives, including the safety of the child, the provision of supports to sustain rural Ireland and environment concerns must also be considered as part of the broader evaluation of the costs associated with the provision of school transport. As stated above, it is the view of the Board that subsidised school transport should be viewed as a public good and an investment in the development and sustainability of Ireland.

In this connection, the Board notes the importance also of the 'Special Transport Grant' which is available, at the discretion of Department of Education officials, in such circumstances where public transport is unavailable or the particular circumstances are such that public transport is inappropriate for a child (eg with specific medical needs). The Board wishes to highlight that this additional grant is greatly valued by families and schools. It is important that this facility is maintained as it allows for flexibility in the provision of school transport to cater for situations of particular need or challenge.

5. Access to Education

The provision of a State subsidised public transport scheme, with the capability to provide the highest possible level of service provision is essential to achieve full equality of access to education for children and young people, particularly those living in rural areas. The existing school transport scheme is over sub-scribed, particularly by those families seeking 'concessionary' tickets.

² The cost of school transport provision in 2020 was €224.7m (source: Minister for Education; Dáil Debates 1st July 2021, Q1.).

³ 'Spending Review 2019: School Transport Review', DPER/Irish Government Economic and Evaluation Service (IGES), 2020.

In that regard, and keeping in consideration the wider policy objectives that the availability of school transport supports, the Board would encourage Government to reduce the cost of school transport further. The Board notes that the same school buses (of the same size and model) are used at primary and post-primary level, but yet, the cost to a parent with a child at post-primary level is four times that of a primary level child. This seems to be an anomaly that merits closer examination. The Board notes that the charge to a parent forms only 11% of the cost of transport at primary level and 38% at post-primary level. Given the stated broader policy objectives in which school transport plays a key role, a move towards a zero cost for primary level children, and up to Junior Cert level also, given that that school leaving age is sixteen would seem to be both desirable and achievable in terms of policy. The Board welcomes the announcement by Government of a general 20% reduction in public transport charges and looks forward to this reduction being applied to school transport charges.

The Board notes that Bus Eireann do not seem to provide a 'late applications' option for those who are moving to an area after the closing date. This is problematic for a number of reasons; not least in that it acts as a disincentive to families to re-locate to rural Ireland as it immediately places the cost of 'getting to school' into the decision making process for that family (particularly relevant at a time of increased fuel costs). It also acts as a disadvantage to schools as it means that the 'new' child will be unable to augment the numbers using the bus service and therefore not contribute to the minimum number needed for a bus route until the following school year. The Board notes that 'concessionary' tickets are not always availed of, even where there is ample spare capacity on a bus route. This contributes to inefficiency. The Board suggests that the review of the scheme should give close consideration to the application and awarding of transport places (in particular the use of a strict closing date).

6. Inequality and Disadvantage

The Board has already noted in this submission the important role that subsidised school transport plays in contributing to equality of access to education. Additionally, the Board notes that there is flexibility in the existing school transport scheme regarding the availability of grant funding in contexts of particular need or to overcome a particular difficulty. The Board commends this aspect of the scheme in particular as a practical and compassionate outworking of the policy objective that the scheme is seeking to achieve. In that connection, the Board suggests that further consideration should be given to this aspect of the scheme; specifically, the availability of the scheme to those in disadvantaged circumstances. The Board notes that 'medical card' holders may avail of school transport on a no cost basis if they meet the eligibility criteria.

Taking a positive approach to tackling inequality and the promotion and resourcing of access to education, the Board suggests that Government should give strong consideration to also making school transport available on a no cost basis to families in receipt of State income allowances and benefits. It seems incongruous and unfair to charge already disadvantaged families who are in receipt of social welfare allowances and benefits for the transportation of their children to school. The Board would view such a move to be not only compassionate, but morally right and just.

7. Diversity in Schools – Sustaining and Supporting Diversity

The main target group for subsidised school transport are children and young people (including those with SEN) who live at a distance beyond 3.2kms from their nearest **suitable** school, where alternative public transport does not exist. Since the inception of the School Transport Scheme, in the 1960's, there has been a recognition that the scattered nature of the Church of Ireland (and

Protestant) religious minority community, the provision of its network of primary schools and post-primary schools, is highly dependent upon the availability of school transport. The Department of Education will be aware, from its records, that the number of Church of Ireland primary schools decreased significantly in the period from 1965 to 1975, based in large part to the introduction of the school transport scheme. From that period onwards the 'central' school – central for the purposes of transport logistics – became a feature of Church of Ireland primary level provision (termed 'CNS' or Central National Schools). The closure or amalgamation of over two hundred primary schools across the country at that period resulted in significant cost savings for the State; all on the basis that the children in such closed schools were provided with transport to their nearest 'suitable' (in terms of ethos) school. While the 'closed school rule' was eventually phased out, it remains the case that Church of Ireland and Protestant primary schools remain highly dependent upon the provision of subsidised school transport due to decisions taken on that basis decades before. It is also noted by the Board that only thirteen of the twenty-six counties have a Protestant post-primary school.

It is essential therefore, to ensure the future viability of Church of Ireland primary schools in rural Ireland, that the concept of the 'nearest suitable school' should remain in place. It is also noted that this provision is not only relied on by the Church of Ireland minority as the Board is aware that schools under other religious minority patrons (e.g. Islamic and Jewish) rely on this provision in the scheme also. The removal of this provision in any revised scheme would undermine if not impact detrimentally on the continuation of that primary level education provision. The Board are of the firm view therefore that provision for school transport to the nearest suitable school is essential to ensure recognition of the rights of parents from religious minorities to access education in harmony with their Constitutional rights (as has been the case heretofore).

Nonetheless, the consistent position of this Board has been to recognise that the availability of a free or reduced cost public transport school system is a privilege which carries with it some restriction on individual choice. The Board reiterates (as was stated in submissions in 2010 and 2013) that the State is under no obligation to provide for parental 'free choice' in regards to parents choosing one school over another on the basis of preference; as opposed to the facilitated ability to access a particular school in order to ensure that minority religious rights are given a practical expression.

8. Special Educational Needs (SEN) Transport Provision

It is beyond the scope of this submission to provide any detailed analysis of the operation of the school transport scheme in relation to how children and young people presenting with SEN are accommodated under the scheme. Church of Ireland Schools, at primary and post-primary level, take great pride and place great emphasis on the inclusivity and diversity of the school to all learners, including those with SEN.

Information available to us from the Boards of Management and Principals in schools under Church of Ireland patronage indicates that transport to school for children and young people with SEN is now considered an essential resource and is a primary resource in ensuring that schools serve the needs of learners with SEN. The Board is mindful of agreements between the State and the United Nations (2018) and the policy of the NCSE on embracing total inclusivity and the essential nature of transportation to school to give practical implementation to these legal agreements and rights.

Where the State is unable to provide such support or as an additionality to such support, the Church of Ireland has provided some grant aid from its own educational resources. However, the increasing

costs of such specialised school transport has made the amounts available from this source insufficient. The Board suggests that the provision of school transport related to SEN requires a discreet analysis of its own to identify where efficiencies might be achieved and to also identify how such a scheme might operate in the future. In that regard, the Board notes that some of the provisions of the existing scheme do not fit with the specific needs of SEN students.

The Board believes that it is sensible to consider the creation of a separate SEN school transport scheme, for operational and logistical purposes, but which might implement also include an element of grant funding to schools at an individual level, since school leaders and Boards of Management are best placed to know what individual learners with SEN's would require. The benefit to parents may be that more autonomy at local level would avoid lengthy discussions and negotiations with the Department of Education on the availability of SEN transport resources.

9. Support for Sustaining Rural Ireland

The Board notes that the role of schools is specifically referenced in the recently published policy document 'Our Rural Future' as being "valued in their communities in that they provide a vital link to local heritage and history, help [to] sustain rural populations and often act as a link for sports and social activities"⁴, with a particular commitment to support and sustain small primary schools (defined as schools with four teachers or less). The availability of transport to school is an essential service in fulfilling this policy objective and has been provided to schools since the 1960's. In our contemporary times, subsidised public transport to school has become even more important.

The impact of the Covid 19 pandemic has resulted in families relocating to live outside urban settings. The shift to the widespread acceptance, practice and practicality of 'working from home' has created a new opportunity for the rejuvenation of rural Ireland. The old idea of professionals having to move full time to Dublin or some other urban centre for employment has passed into social history. It is obvious that working from the home or non-office setting has taken hold in the world of desk based work. For families with children of school going age, the availability of school places and getting children to and from school will play a role in any decision to relocate outside of an urban setting. Educational provision, and the infrastructure supporting it, must therefore be part of any Government policy on the future of rural Ireland, if the vision of the long term rejuvenation of rural Ireland is to be realised. Subsidised School Transport is one of those essential pieces of infrastructure (along with reliable broadband, IT equipment and fully equipped modern school buildings) and in this regard, the Board is glad to read that this is recognised by Government. Connectivity, both physically and digitally, is highlighted as a factor of huge importance to people living in rural Ireland.

In regards to transport connectivity, the Board is interested to learn of the commitment given "to protect and expand regional bus connectivity and connectivity in rural towns and villages in rural Ireland".⁵ It would seem that there is scope to make wider use of the fleet of school transport vehicles beyond that of simply conveying children and young people to and from school. The Board suggests that, given the commitment of Government to "protect and expand" school transport, that the service could be reimagined as a service supporting all school activities (such as school trips, school sporting and cultural events). In other words, it seems that there is an opportunity to expand out the service into a transport service that provides a stronger role in resourcing the activities of school life. The burden to fund transport for school activities is largely reliant upon fundraising

⁴ 'Our Rural Future. Rural Development Policy 2021-2025', Government of Ireland, 2020, pp. 61.

⁵ 'Our Rural Future. Rural Development Policy 2021-2025', Government of Ireland, 2020, pp 64

activities by parents. It is suggested that increasing the level of services provided under the school transport scheme would reduce the fundraising burden upon parents while also achieving the stated policy objective of Government to expand the school transport scheme.

10. Care for Our Environment

Care for our environment is a concern that is common to all citizens of the planet. It is obvious that the more children and young people of school going age who travel to and from school by means other than the private motor car contributes to a range of environmental benefits. The Board was interested to note that 21.5 million car journeys are avoided annually through the school transport scheme (or 35,000 per day). The Board also notes that Bus Éireann has indicated that it intends to move its fleet to zero emission or hydrogen powered buses by 2030.

The declaring of a climate change emergency by Dáil Éireann in May 2019 creates the basis for prioritising for expanding the role and availability of public transport across Irish society. The figures showing how the current (limited) school transport service avoids millions of private car journeys annually shows that public school transport is an essential instrument in tackling climate change, caring for our environment and moving Ireland towards the stated Government policy aim of a carbon neutral environment by 2050.

In this regard, the Board suggests that the Department of Education should give consideration to engaging with school communities and school leaders on exploring how schools might move from being passive recipients in the school transport scheme to being active agents in determining how members of the school community can get to school without recourse to the private car. The Board is aware of the Green Schools Travel Initiative (www.greenschoolsireland.org) and suggests that this initiative should receive stronger support and resourcing as it seems an ideal programme through which to engage school communities into actively seeking ways to move away from transport to school by private car.

11. Concluding Remarks

The provision of subsidised school transport (at both primary and post-primary level) has been a feature of school infrastructural support since the 1960's. This service has been conceptualised as having as its purpose the task of getting children and young people to and from school on a reduced cost basis (to the parent). Given the changes in Irish society and the importance of public transport in combatting climate change, it is timely to review the school transport scheme.

The observations in this submission are broad in approach since the review of the school transport scheme will engage with individual school communities who are best placed to highlight specific details regarding identifying efficiencies that could be made to improve the operation of the scheme. However, in this submission, the Board has sought to make some general observations which may be of assistance in reviewing the scheme. In summary these observations are:

- That the provision of subsidised school transport plays a vital role in sustaining and supporting schools in rural Ireland and that there is great potential within the scheme for the development of broader provision.
- That school transport is an important element in seeking to ensure that children travel to and from school in a safe manner.
- That the provision of subsidised school transport has played a key role in ensuring equality of access to education since the advent of educational expansion and economic

development and that it is time now to move from subsidised school transport to freely available school transport.

- That, at a minimum, school transport should be free for those in receipt of social welfare payments with greater flexibility and discretion for schools and parents in accessing the scheme.
- That the provision in the existing scheme that transport is to the nearest suitable school is of vital importance to parents of minority religious denominations and is an outworking of a Constitutional right and must remain as a provision in the school transport scheme.
- That specific focus should be given to the provision of school transport for children and young people with SEN.
- That school transport must be considered within the broader policy context of supporting the rejuvenation of rural Ireland.
- That, in an environmental awareness context, the school transport scheme should play an instrumental role in government policy on tackling climate change.

The Board is grateful for the opportunity to make these observations on the operation and role of the School Transport Scheme and is available to discuss this matter further.

The Board is joined in this submission by the Education Panel of the Presbyterian Church in Ireland and the Methodist Board of Education as both of those Boards have observer status at the General Synod Board of Education of the Church of Ireland.

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