

Dear Commissioner,

APFACTS is the peak body of parents of independent schools in the ACT. Children at independent schools have been heavily disadvantaged by the proposed bus network. Independent school children travel from all around Canberra to attend the school chosen by their parents. Anecdotally, independent school children are more frequent and younger users of public transport. They are also travelling greater distances than other educational institutions users due to the choice of school. Geographical location generally has little to do with the schooling decision. However, transport options have a huge impact on decisions made by parents on behalf of their children. APFACTS officially submits a written objection to the policy proposed by Transport Canberra on the grounds that it disadvantages children at their most vulnerable, when they are not supervised by either their parents/carers or teachers.

Our biggest concern with this policy is the transfer of duty of care. When children are at school, the school has duty of care. When children are on dedicated school buses, the bus driver has duty of care. In the new proposal all children will be transitioning through bus interchanges. Who has duty of care of our most vulnerable people in public bus interchanges?

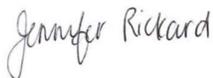
Transport Canberra say they will be employing safety officers but APFACTS argues that because safety officers will have no idea of who and how many children they are 'protecting', this is not a sufficient provision of duty of care.

APFACTS calls on the ACT Children and Young people's Commissioner to review the proposed policy brought forward by Transport Canberra and to make a determination if this policy contravenes the rights of children and young people by decreasing the service delivery in terms of children safety on public transport.

Additionally, Transport Canberra has not sought age appropriate consultation with children and school students on the proposed changes that impact upon them so significantly. Nor has it attempted to include them in the data collection process. APFACTS is concerned that the children voice has not been determined in this significant change. This will impact not only their personal safety on their journey to and from school but also other areas of their lives. Secondary impacts like the extra time taken for transport will flow on to other areas of their lives like the ability to participate in after school activities and sport.

APFACTS would welcome any opportunity to further discuss these concerns with you.

Kind regards,



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APFACTS Executive Officer



Hugh Boulter
APFACTS President