



CITY AND COUNTY OF SWANSEA

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Dyddiad: 2 November 2010

Dear Madam

Proposed Safety on Learner Transport (Wales) Measure Response from the City and County of Swansea

We appreciate the opportunity to provide comments on this important Measure. The Council has endeavoured over many years to improve the quality of the school transport services it provides and therefore supports many of the principles included in the Measure. As the Explanatory Memorandum to the Measure states, local authorities have an excellent record for providing safe school transport on buses and coaches, which represents the safest mode for young people of getting to and from school.

Consultation Questions

- 1 – Is there a need for a proposed Measure to deliver the stated objectives of :
- improving the safety image and travel experiences of dedicated learner transport, and
 - acting to ensure that safety standards are sufficiently high for the public and parents to have confidence in collective learner transport?

Many parents have a view that bus based school transport is not a safe option for their children. This is despite the fact that statistics show that travel by bus is safer than any other mode and that the numbers of casualties involving pupils on bus journeys has continued to decline with no pupils being killed or seriously injured since 2005. The Measure should therefore raise awareness of these improving safety standards and seek to build on them.

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How will the proposed Measure change what organisations do currently and what impact will any such changes have?

The higher vehicle specification will undoubtedly lead to higher tender prices for school transport services. At present Swansea Council has a maximum age limit of 15 years for larger buses and coaches and is seeking to reduce this further as contracts come up for renewal. Currently contracts are awarded for 4 years, however it is likely that in order to achieve this the contracts offered would have to be for a longer term to keep the costs down and also to encourage operators to invest in newer vehicles. It is possible that smaller local companies may not be in a position to meet these higher specifications and will withdraw from the market thus reducing competition.

In the urban areas of Swansea where there is a good public bus network and there is capacity available at appropriate times, the Council purchases season tickets for learners to travel on these services rather than provide a separate dedicated school bus. This reduces the number of buses that are on the road at peak times, avoids duplication of resources and makes the public transport network more sustainable. The new vehicle specifications would not apply to these services which could lead to concerns that pupils using them are being treated less favourably than those on dedicated school transport services. This would also apply where a journey for school children is included as part of a subsidised bus service network, for example the Gower Explorer or Lliw Link services in rural Swansea which are operated by low floor buses. If the Measure requires that the journeys carrying school children met the higher specification, thus removing them from the network to be carried on separate school transport vehicles, then the viability of these rural bus networks would be seriously undermined.

3 – Are the sections of the proposed Measure appropriate in terms of achieving the stated objectives?

Fitting of appropriate seatbelts

The issue of whether seatbelts would need to be fitted to public service vehicles that convey school children would need to be addressed. If this is the case then separate dedicated school buses would need to be provided which would incur additional costs and duplicate public transport services in some instances. The responsibility for ensuring that seat belts are used needs to be addressed if they are provided.

Double deck vehicles

The Council does not use the vehicles for school transport and their use was phased out over several years when contracts came up for renewal. Unless large capacity single deck vehicles are available to replace them, there can be an increase in the number of vehicles required to convey the same number of pupils leading to additional traffic on the roads and congestion at school sites where room for buses is often restricted.

Vehicles manufactured after a specified date

Newer vehicles are likely to improve the attractiveness of school transport for pupils and there is some evidence to show pupils treat newer vehicles with more respect than older ones with less vandalism as a result. However a high quality maintenance regime with safety checks enforced by VOSA and good cleanliness standards can make older vehicles just as safe and attractive.

Yellow bus specification

This would require the provision of the same driver and vehicle on set routes each day which many authorities are currently achieving. However driver training on

Swansea Council does ensure that a seat is provided for each pupil on dedicated school transport vehicles and these are all fully seatbelted, but unlike the 'yellow bus' model, pupils are not allocated to specific seats and there is no register of pupils although drivers do check the pupils passes as they board the vehicles. The registration process has been trialled as part of the Zoom project in North Wales, but there are significant costs to this.

Driver training

The introduction of a requirement for specific driver training for school transport would be welcomed as in the past driver training has concentrated mainly on the driving issues and not on the customer care elements of dealing with young people. The SWWITCH School Transport Project Team funded by WAG/WLGA has developed an innovative driver training scheme specifically for school bus drivers. This has been approved as part of the Drivers Certificate of Professional Competence and school transport drivers in the South West Wales region are currently undertaking this training. Feedback so far has been very good.

Fitting of CCTV

This has been fitted in the last year to 30 vehicles on school transport in Swansea. The impact has been positive in improving pupil and driver behaviour. This improvement however is also linked to the SWWITCH School Transport Project where a programme of pupil training has been undertaken at schools covering the importance of good behaviour on the bus and the impact of disruptive behaviour on the driver.

Risk assessments

Swansea Council is supportive of the requirement to carry out risk assessments and is undertaking these at present using the method prepared for WAG as part of the SWWITCH School Transport Project. There is currently some resistance from operators to carrying out the risk assessments but if they become statutory then local authorities will be able to insist that they are completed.

Supervisors

Swansea Council currently provides supervisors on routes carrying primary aged pupils and also occasionally on routes where there are problems with pupil behaviour. Contractors sometimes encounter problems with recruiting appropriate supervisors because of the part time nature of their role, the responsibility they have and also the low wages they are paid. If there is an increase in the requirement for Supervisors, there would be an increased cost but also probable difficulties in recruiting them. Any Supervisors would need to be properly trained in the same way as it is proposed to train school transport drivers. The need for supervisors should also be considered alongside the provision of CCTV which can also effectively monitor pupil behaviour.

Taxis and Private Hire vehicles

The Council has no objection to the proposal to grant powers to Welsh Ministers to regulate for safety in these vehicles. However this is subject to resources being available to implement any additional requirements.

Sanctions and Enforcement

The intention of Welsh Ministers to consult with local authorities before making any regulations resulting from this Measure is welcomed. Clarification would be required however as to who would be criminally liable in certain circumstances. For example, if a Council has contracted a company to operate a school transport service and has

Is there a breach of the regulations – will the Council be criminally liable alongside the contractor? What responsibility will the local authority have for ensuring that contractors comply with the legislation and will there be an increased burden of monitoring placed upon them?

4. - What are the potential barriers to implementing the policy provisions set out in the proposed Measure (if any) and does the proposed Measure take account of these?

There needs to be a clearer definition of 'dedicated learner travel' and ' public service/urban buses' as many authorities have public service vehicles providing journeys purely for school children at peak times.

There are limited staffing resources in Local Authorities to implement any additional measures.

Any changes to the specification of vehicles will need to be phased in over a number of years as there are unlikely to be the required number of vehicles readily available to meet the new requirements.

The current level of VOSA inspectors will need to be enhanced in order to monitor the new vehicle standards and ensure compliance.

5.-What are the financial implications of the proposed Measure for organisations, if any?

There are concerns about the affordability of implementing the proposals at a time when local authorities are having to make substantial cuts to their existing budgets. As well as increasing the cost to local authorities, there would also be increased costs for transport providers potentially leading to companies withdrawing from the market and thereby reducing competition for tendered services.

6.- Other comments

The Measure focuses mainly on vehicle standards and there is little emphasis on the pupils, drivers and passenger assistants involved in school transport operations. There are safety issues which can be addressed by training and in the SWWITCH Region the School Transport Project team, funded by the WLGA, have developed pupil and driver training courses. So far over 18,000 of the 60,000 pupils in the region have been trained. Before and after training data has been collected and the results are exceptionally good. In the term before the training there were 55 recorded incidents in the measured school group and in the term after the training there were only 15 recorded in the same school group. The training takes up to a normal lesson time to complete and is normally undertaken on a bus. The Driver training scheme is specifically designed for school bus drivers and has been approved as part of the Drivers CPC. This training has been developed and implemented at relatively little cost when compared to some of the items proposed in the Measure and yet is having a significant impact on the safety of pupils using school transport.

Please do not hesitate to contact me if you require any further information

Yours faithfully



C L Swain
Acting Group Leader - Transportation