



An Roinn Oideachais  
Department of Education

# School Transport 2030

Review of the School Transport Scheme - Phase 3  
Report



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## **Chapter 1 - Summary of the review – findings and recommendations**

### **Background**

The Department commenced a review of the School Transport Scheme in February 2021. The review is being conducted with a view to examining the current scheme and how it currently operates, its broader effectiveness and sustainability and that it adequately supports the provision of services to students and their families. The review encompasses the School Transport Scheme for children with special educational needs and the primary and post primary schemes. The review examines each element of the schemes and includes eligibility criteria, trends, costs, cost drivers, and overall effectiveness in meeting the objectives of the schemes. The review also examines the potential for integration of different strands of the scheme and a more co-ordinated approach with other Government Departments that also use transport services.

### **Phase 1 of the Review of the School Transport Scheme**

In June 2021, as part of Phase 1 of the review, the Steering Group presented the Minister for Education with an initial interim report on eligibility with an examination of issues for mainstream pupils relating to the nearest and next nearest school. Following consideration of this report, measures were approved by the Minister which allowed for the provision of transport for post-primary students who are otherwise eligible for school transport but are attending their second nearest school and had applied and paid on time. This arrangement has remained in place pending completion of the full review of the School Transport Scheme.

### **Phase 2 of the Review of the School Transport Scheme**

Phase 2 involved a detailed analysis of the objectives of the School Transport Scheme, for both the mainstream and Special Educational Needs (SEN) schemes. As part of Phase 2 a comprehensive analysis was completed on:

- The evolution of the objectives of the scheme
- The rationale for the scheme with reference to the Public Spending Code
- How the scheme fits with school planning policy
- How the scheme fits with broader Government policy and Programme for Government commitments
- The value for money of the scheme (to the Exchequer and to parents/guardians)

- Transport schemes in other jurisdictions
- The stakeholder engagement process
- The fiscal sustainability of the scheme

Following this comprehensive analysis, the following were recommended as being the objectives of the School Transport Scheme:

- To facilitate access and attendance for children to education in recognition of a child's constitutional right to education.
- To provide a safe, reliable and quality service
- To facilitate and support access to the labour market for working parents/guardians.
- To support school planning and building policy
- To support Government policy, including:
  - The Climate Action Plan
  - The National Development Plan/Project Ireland 2040.
  - Our Rural Future 2021 - 2025
  - The Safe Routes to School Programme
  - Bus Connects/Connecting Ireland.
  - An Inclusive Education for and Inclusive Society
  - The Road Safety Strategy.
- To provide a fiscally sustainable scheme and to provide value for money to parents and the Exchequer

Arising from these objectives the following are the options to be explored for potential changes to the future operation of the School Transport Scheme.

- Review distance eligibility criteria, while being mindful of walking/cycling initiatives
- Assess ticket charging options
- Examine options for transport based on demand
- Initiatives/options to encourage greater uptake of the scheme
- Integration of SEN and mainstream schemes
- Integration with public transport

**In all of the above, the Steering Group and the Technical Working Group are mindful of the need to consider:**

- Balancing the benefits of climate action against the cost of the scheme.
- Balancing the economic benefits of the service, particularly in rural Ireland, against the cost of the scheme.
- Benefits of the scheme to working parents, etc. against the cost of operating the scheme.
- The fiscal sustainability of the scheme.

These options will be fully explored in this report – Phase 3 of the Review of the School Transport Scheme.

### **Phase 3 of the Review of the School Transport Scheme**

Taking on board the conclusions and recommendations of Phase 2, Phase 3 involves an examination of issues around eligibility criteria, scheme performance, scheme expenditure and the potential for scheme integration.

As part of Phase 3, a comprehensive cost benefit analysis (CBA) was conducted on a number of options for potential change to the future operation of the scheme. An analysis was also conducted on the potential for change to certain scheme operational matters, such as the rate of grant payments, the employment of school bus escorts, the current application timeline and process, and the potential for technological improvements to the scheme. As part of phase 3 an analysis was also conducted on how the scheme can support active travel measures and the potential for integration of the scheme with public transport.

Throughout the review, the value of the School Transport Scheme to both families and in supporting wider Government policies has been very apparent. It is noted from the analysis conducted in Phase 2 and built upon in Phase 3 that the scheme plays a very important part in supporting the following:

- Climate action – The Transport chapter of the Climate Action Plan includes a target to increase the number of journeys taken using sustainable travel (cycling, walking and public transport) by an additional 125,000 journeys by 2025 and a 30% shift in escort to education car journeys to more sustainable modes of transport by 2030. The Plan also requires Ireland to achieve an overall 51% reduction in emissions by 2030 (relative to 2018 levels) and net-zero emissions no later than 2050. Encouraging greater uptake of School Transport Scheme services can support achieving these targets.
- Rural connectivity – As part of the stakeholder engagement process conducted during Phase 2 of the review, the importance of the scheme in supporting rural connectivity and in supporting people to live and work in rural Ireland was very apparent. This was particularly important where there is a lack of public transport alternatives and where road conditions or distance from school of attendance means it is unsafe for children to walk and cycle to school. A total of 8,180 parents completed a survey as part of Phase 2 of the review, of which 88% of parents said that the School Transport Scheme was essential to them and 96% of

parents said that public transport was not an option for them in order for their children to attend school.

- Tackling rural deprivation – As stated above the analysis undertaken as part of Phase 3 has demonstrated the School Transport Scheme plays an important role in facilitating connectivity in areas of the country that are relatively poorly served by public transport and these are typically more deprived than more urban areas. The analysis demonstrated that the proportion of the school going population using School Transport Scheme services is typically higher in those counties with higher levels of deprivation. The scheme is vital to families in these areas to support them in bringing their children to school.
- Supporting the labour market and saving time for parents/guardians – As per the 2016 CSO (Central Statistics Office) data, 60% of primary school pupils and 42% of post primary pupils are driven to school, almost a triple of what it was a generation ago. The analysis in the review has shown that a key benefit of supporting greater uptake of the School Transport Scheme would be savings for parents/guardians from car journeys avoided, the reduction in vehicle running costs but also freeing up the time spent for these parents/guardians to be available to the labour market and other economic activity. In response to the parental surveys 77% of parents, which was 6,298 parents, said that they rely on the School Transport Scheme in order to attend work and those who currently do not use school transport, over 52% they would use it as it would help them to attend work.
- Life skills for children, including children with special educational needs – The analysis has shown there are benefits from school transport in terms of independence and life skills for children. For example, time management when using school transport. Students using school transport must follow the bus schedule and develop their own routines and self-discipline in order to make the best use of the service. The time management and self-discipline of students may lead to an increased sense of independence from their parents. It is also suggested that students may also gain these skills from the additional responsibility of having to board the school bus at the correct time and location each day.

The financial appraisal conducted by the independent consultants as part of Phase 3 of the review demonstrates that while the School Transport Scheme operates at a significant financial net cost to the Exchequer, the subsequent economic appraisal shows that the Scheme has demonstrable wider economic benefits (while noting that it was not possible to quantify all of the economic benefits, some of which fall outside the Transport Appraisal Framework used in this review). The fact that the School Transport Scheme operates at a financial loss is evidence of its role as a public service and demonstrates that in the absence of the School Transport Scheme, it is unlikely that any private services would fulfil the role of the existing School Transport Scheme. While private alternatives may operate on certain routes, the scale of the financial loss to operate the scheme at its existing and proposed levels of service imply that without the School Transport Scheme the majority of families would have to rely on alternative modes of transport to and from school and may experience difficulty in getting their children to school.

The analysis further demonstrated that changes to the eligibility criteria for the School Transport Scheme may lead to significant increases in demand for School Transport Scheme services. Changes in eligibility, as well as projections for future student numbers indicate that there is likely to be

significant demand for School Transport Scheme services over the coming years. The projected increase in usage of the scheme from broadening the eligibility criteria and lowering the prices is demonstrative of a likely latent demand for school transport services in the population that can potentially be activated by increasing the supply of the service. Activating this demand has potential significant benefits with regards to wider policy objectives to reduce car dependency, promote sustainable travel and reduce transport emissions. The economic analysis indicates that providing school transport services to meet this level of demand would represent a net economic benefit to wider society.

Of the six options examined in the CBA (full details of the options examined are set out in chapters 3 and 4 of this report), the economic findings indicate under the integrated analysis (combined SEN and mainstream), Option 1 has the highest BCR. The financial findings indicate that while Option 4 has the lowest level of financial losses and represents a significant financial cost saving, this option involves the lowest number of pupils on school transport and imposes the highest cost of school transport on users, both of which outcomes run contrary to wider government policies.

It should be noted that while the economic appraisal has included all costs and benefits of the Scheme which are readily quantifiable and monetisable, it is demonstrated in this review that there are benefits from school transport in terms of independence and life skills for students, as well potentially facilitating labour force participation and employment in rural areas and reducing road congestion. While these benefits are less readily monetised and included in the appraisal, they should not be discounted in the assessment of the role of the School Transport Scheme.

The cost in NPV terms of providing School Transport Scheme services under Option 1 is estimated to be €7.053bn over the 20 year period of the CBA, or an estimated annual average cost in NPV terms of €352.65m. This total is made up of an estimated cost of €3.9bn in NPV terms for the operation of the mainstream School Transport Scheme and €3.1bn in NPV terms for the operation of the SEN element of the scheme. This constitutes an average annual cost over the 20 year period of €196m in NPV terms for the mainstream scheme and €157m in NPV terms for the SEN scheme.

With regard to the analysis conducted on the fiscal sustainability of the Scheme in line with Department of Public Expenditure and Reform guidelines using a 5% growth in costs per annum, under these terms it is not possible for the scheme to be fiscally sustainable as the costs associated with the base year 2019 relate to a smaller number of pupils than those projected to use the Scheme under the options set out in this review and therefore is not comparing like with like. With the projected increase in pupil numbers this adds additional costs at a level above DPER's guidelines on annual cost growth rate of 5%. The pupil numbers carried at the end of the appraisal period under Option 1 is projected to be 211,531, while under the "as-is" option the projected pupil numbers are 113,424.

However, when analysing the costs over the 17-year period 2023 to 2039, this shows an average growth rate for the period of 3.9% for Option 1 compared with an average growth rate of 5.8% for the period 2020 to 2039. This is the case as for the years 2020 to 2022 of the schemes, due to the assumptions on the phasing in of various elements (e.g. new eligible users, integration of SEN and

mainstream transport, increased uptake to contribute to CAP targets, etc.) the growth rates are higher because of the number of new students that are assumed to use the scheme, which is much higher than the normal growth rate. Once these are settled, annual growth rates are more reasonable. As can be seen from the analysis, under Option 1 from 2028 onwards the annual growth rate in costs is anticipated to be 3.5%, falling annually thereafter, to as low as 2.6% in 2039.

It must also be noted that when assessing the estimated changes in costs on a per user basis under each option, this provides a more insightful means of comparing the fiscal sustainability of the options. On this basis, accounting for changes in student numbers, use of excess capacity, economies of scale with regard to administrative costs and inflation it can be demonstrated that per pupil costs under each option will increase at a significantly lower rate than the 5% per annum threshold for fiscal sustainability. The modelling undertaken indicates that costs per pupil will increase by an average of between 2.3%-2.8% for each of the ‘Do Something’ options and by 1.4% for the As-Is option over the appraisal period. On this basis, allowing for the significant difference in projected users under the options, the options can be judged to be fiscally sustainable.

Taking on board the analysis conducted over the three phases of this review and the outcome of the independently completed CBA, the recommended options for the future operation of the School Transport Scheme are (with a full summary included in chapter 8 of this report):

- Distance criteria on the mainstream schemes should be reduced incrementally, with an initial reduction to 2km for both primary and post-primary, and a subsequent reduction to 1km and 2km for primary and post-primary respectively. This will not apply in towns and cities that have public transport services available for children to travel to school.
- Distance criteria on the SEN scheme should remain unchanged and children should remain eligible to the closest school that is or can be resourced to meet their needs. However, a Working Group should be established to enable ongoing improvements to the scheme.
- Ethos - the current way ethos is treated on the primary and post-primary schemes should remain unchanged but the published schemes should be amended to reflect how ethos is treated differently at primary and post-primary level.
- Language – the current criteria as it relates to language should remain unchanged and children should remain eligible to their nearest school having regard to language.
- Concessionary applicants – the term “concessionary” should be removed from the scheme and replaced with the term “not eligible”. Applicants who are not eligible will be allocated a “spare seats” ticket should capacity exist once all eligible children have been catered for.
- Minimum numbers criteria – routes with less than 10 pupils should be maintained but for discussion on the potential to transfer pupils to public transport routes. New routes will be established in consultation with the Departments Planning and Building Unit and where there is a minimum of 10 pupils who require transport.
- Nearest school criteria – nearest school criteria will be eliminated. All existing routes will be maintained and will cater for all children who meet the scheme’s distance criteria from home to their school of attendance on that existing route.
- Inclusivity – measures will be implemented to enable children with SEN to travel on mainstream services where there is a service available, where this would support the needs of



the child and where their parents/guardians wish for them to do so. It is noted that in the longer term as more SEN school places become available locally the potential for inclusivity on mainstream services will be increased.

- Pricing on the mainstream schemes – it is recommended that there be an annual ticket charge but that children who hold a full medical card should remain exempt from the annual charge. The annual charge should be reviewed in 2025.
- Pricing on the SEN scheme – it is recommended that children travelling on SEN services should remain exempt from the annual charge. This should be reviewed in 2025.
- Exceptional circumstances – it is recommended that the current practice for assisting children in exceptional circumstances (for example, homelessness) be continued in order to minimise the risk of non-attendance at school.
- Rate of grants – it is recommended that there be no change to the rate for the Remote Area Grant but that there should be an increase in the Special Transport Grant.
- Application process and timelines of the mainstream schemes - it is recommended that technological improvements on the application process be completed. It is recommended that there be a one step process to apply and pay and that the payment date be brought forward to allow Bus Éireann adequate time to plan services, allocate tickets and communicate with parents. It is recommended that the online application portal be closed for a short period annually once the payment deadline has passed.
- Application process and timelines for the SEN scheme – it is recommended that the current paper based application process be replaced with an online application process. It is recommended that the current practice be continued whereby parents/guardians are encouraged to apply by the last Friday in April but that applications will continue to be accepted on a year round basis.
- Methodology for measuring distance criteria – it is recommended that the current method be replaced with contemporary mapping methodology for measuring road distance.
- Technology/ICT improvements – it is recommended that work underway both within School Transport Section and between the Section and Bus Éireann be completed in order to improve efficiency, accountability, data availability and simpler, more customer friendly and transparent interfaces.
- Bus Escorts – it is recommended that work underway by School Transport Section on employment related information for school management authorities be completed.
- Active travel – it is recommended that School Transport Section should continue to engage across Government to support and co-ordinate active travel measures and initiatives.
- Integration with public transport – it is recommended that a Working Group be established with the Department of Transport and the NTA and other relevant bodies as required to pursue measures for the integration of school transport and public transport in conjunction with the roll out of the Connecting Ireland project.

Full details of these recommendations and the analysis of each is laid out in full in later chapters of this report.

## Chapter 2 - Programme Logic Model

### 1. Programme Logic Model

#### Introduction to School Transport Programme Logic Model

The key objectives of the School Transport review are outlined within Phase 2 of the School Transport Review. The Programme Logic Model (PLM), is intended to be used as a resource to assist policy makers evaluating the School Transport review at a system level. The basis for the PLM in this document is based on the objectives of the School Transport Scheme as established in Phase 2 of this review. These objectives have been set out in a programme logic model format and draw on existing data available to the Department of Education and the research and analysis completed within all phases of this review.

#### What is a Programme Logic Model (PLM)?

The PLM is a standard policy/programme evaluation tool and is designed to evaluate policy at a system-level. It allows policy makers to draw upon many information sources into a logical framework. The PLM shows the logical relationships among the resources that are invested, the activities that take place, and the benefits or changes that result. The purpose of its construction is to attempt to assess the ‘if-then’ (causal) relationships between the elements of the programme and linking to the intended outcomes. A benefit of the PLM is that it gives an explicit focus on the intended outcomes for the beneficiaries of the policy. The PLM can then be used as a tool to help monitor and evaluate current and future school transport policy. This PLM outlines the core processes of the School Transport Scheme under the following headings:

- Inputs – the resources dedicated to or consumed by the scheme.
- Activities – the actions or tasks that transform inputs into outputs.
- Outputs – the direct products of programme inputs and activities.
- Outcomes – the effects the outputs have on the actions, behaviour, knowledge or level of functioning of the targeted beneficiaries.
- Impacts – fundamental or unintended changes occurring in local and wider society.

#### Context of the School Transport Scheme Programme Logic Model

The School Transport Scheme in Ireland is set against the backdrop of wider government commitments as outlined in Chapter 1, as well as further reasoning for implementation, for example:

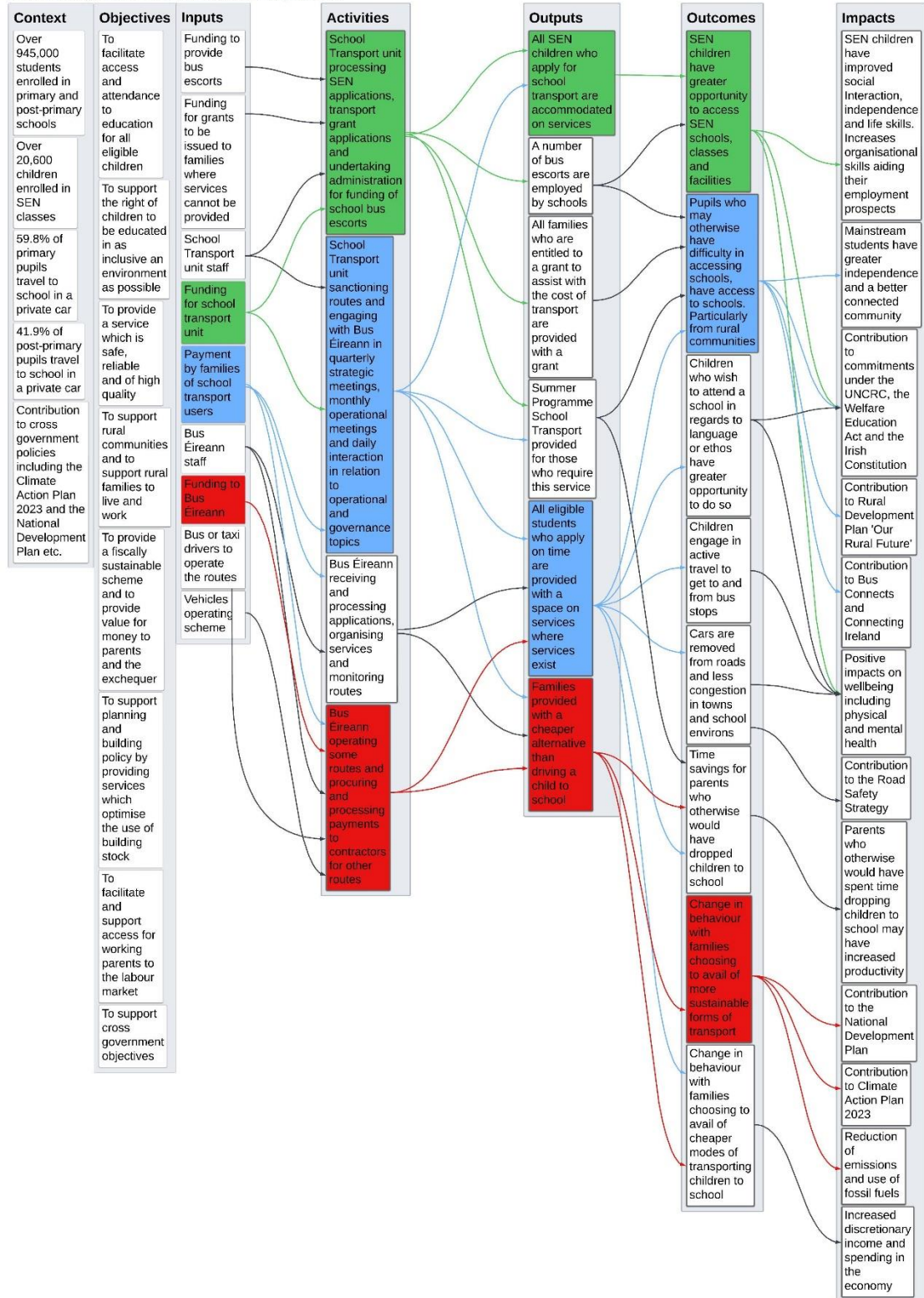
- Ireland has over 945,000 pupils in primary and post-primary education. Over 20,600 of those children are in SEN placements. The School Transport Scheme supports article 42 of Irish Constitution which gives the right to children to have access to free primary education. Under the Education Welfare Act 2000, children have a right to leave state education at 16 years of age, or after they have finished three years at post-primary school. The provision/access to school transport support assists the prevention of early exit from state education.

- Under article 23 of the UN Convention on the Rights of the Child, children have the right to special education and care if they have a disability, as well as all the rights in the Convention, so that they can live a full life. Under article 28 of the same convention children have a right to get a good quality education. Children should be encouraged to go to school to the highest level they can. Member states should take measures to encourage regular attendance at schools and the reduction of drop-out rates. The School Transport Scheme should support these commitments.
- Under Article 9 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) on Accessibility, persons with disabilities have the right to live independently and participate fully in all aspects of life, The article states that State Parties shall take appropriate measures to ensure persons with disabilities have 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. These measures, which shall include the identification and elimination of obstacles and barriers to accessibility, The School Transport Scheme should support these commitments.
- The School Transport Scheme is adaptable in regards to targeted critical responses to crises or unforeseen events such as the Covid 19 pandemic or the war in Ukraine. Ongoing effects of the war in Ukraine have given rise to additional school transport demand. Ireland also faces a cost of living crisis with high levels of inflation.
- As outlined in greater detail later in this report transporting children to schools in private cars is associated with negative effects on the environment. Rural communities generally have less or no access to public transport infrastructure and services when compared to more urban communities. These all feed into the Department of Education’s rationale for intervention.

### Assumptions in Programme Logic Model

Many of the causal links within the PLM are rooted in data available to the Department and in the research undertaken within the school transport review. Within the PLM it is assumed that the presence of bus escorts changes parents’ behaviour towards putting children with SEN on school transport and are more likely to avail of the service in response to this. Within the PLM, it is assumed that parents and pupils have a growing knowledge and concern for environmental and climate change effects. Hence, as the scheme becomes available to more families, more families will opt for the more sustainable form of transport. These assumptions are based on survey responses from parents and guardians in the stakeholder engagement process that was conducted as part of Phase 2 of the review. In the PLM below the colours green, red and blue are used to highlight core strands within the School Transport PLM. It should be noted that the coloured strands are not mutually exclusive or exhaustive, but can be used as an aid to visualise core causal links within the PLM. Green highlights core SEN transport aspects, blue highlights core mainstream transport aspects and red highlights the cross scheme environmental and financial considerations.

School Transport Scheme Core Programme Logic Model



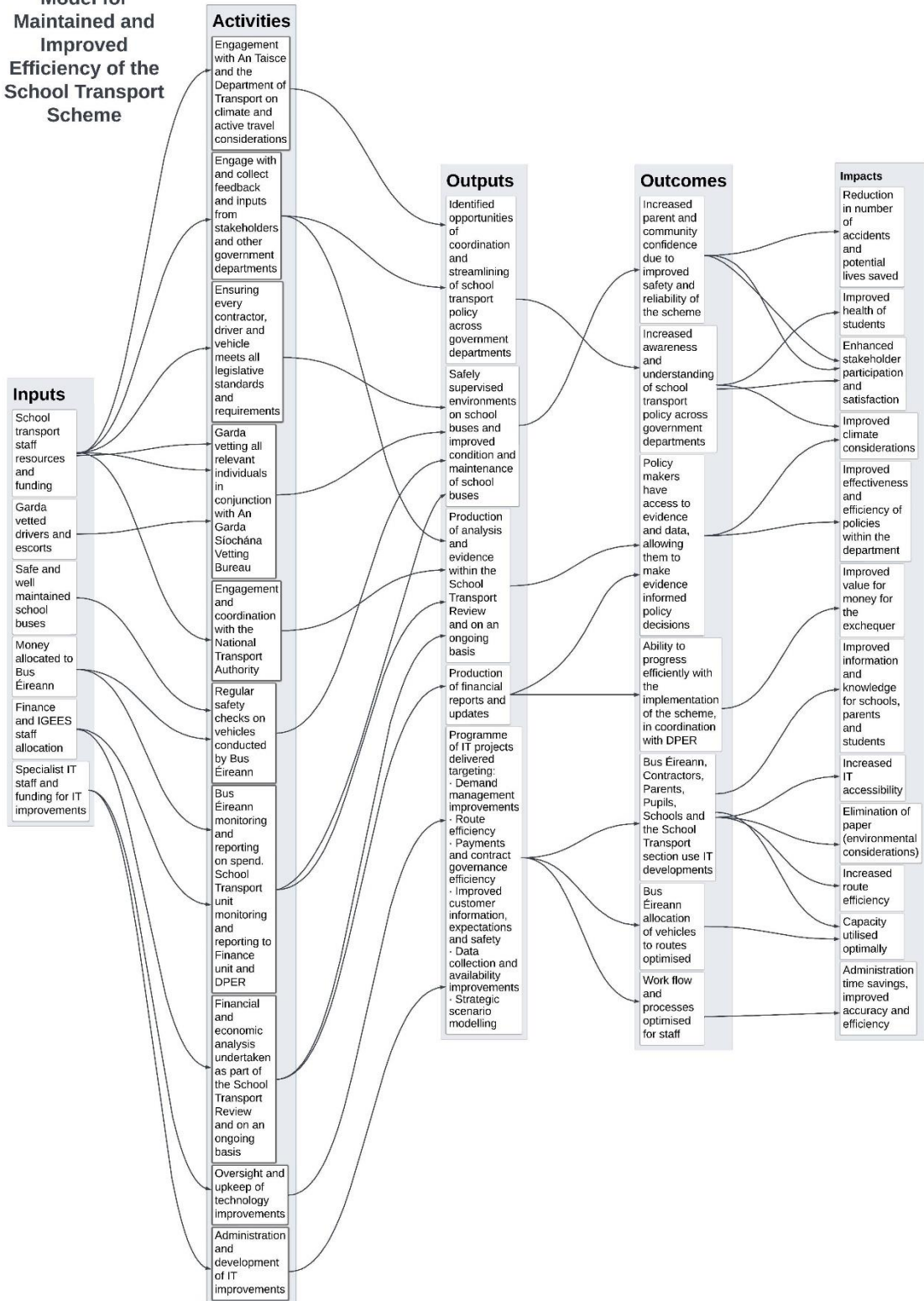
### Programme Logic Model for Improved Efficiency and Maintained Standards

The following Programme Logic Model seeks to look at the steps taken to improve efficiency and to maintain standards and safety within the scheme. The main strands within this PLM include:

- IT improvements
- Financial and economic efficiency improvements
- Maintained and improved information and safety on services and roads
- Engagement with other units within the Department of Education, other Government departments and other key stakeholders to yield a more efficient School Transport Scheme.

It is also the intention of this programme logic model to capture the broad scope of activities that are completed as part of the scheme and capture those which are ancillary to the scheme and benefits its future efficiency. School Transport must meet many legislative requirements to operate safely and effectively. The School Transport Scheme uses substantial resources to meet these requirements hence, a variety of the processes to meet these legislative requirements sit within the PLM below.

**Programme Logic Model for Maintained and Improved Efficiency of the School Transport Scheme**



As stated at the outset, this PLM outlined the core processes of the School Transport Scheme under the following headings:

- Inputs – the resources dedicated to or consumed by the scheme.
- Activities – the actions or tasks that transform inputs into outputs.
- Outputs – the direct products of programme inputs and activities.
- Outcomes – the effects the outputs have on the actions, behaviour, knowledge, or level of functioning of the targeted beneficiaries.
- Impacts – fundamental or unintended changes occurring in local and wider society.

The analysis demonstrates the very many positive outcomes and benefits of the scheme in terms of supporting children with access to education, supporting working parents, supporting families who live in rural Ireland, supporting wider Government policy, including climate action, while providing a safe and reliable form of transport for the families who use it. This is backed up through the analysis completed as part of the review and is demonstrated throughout all phases of this review.

These programme logic models, may in turn be used as evaluation tools for future policy changes within school transport. They can allow policy makers and evaluators to review if links are working within the implemented policy. They can review if there are breaks in the links from inputs through to impacts. If policy evaluators find breaks in the links they can either adapt policy to ensure desired outputs or impacts are met, otherwise they could adapt the links or the desired outcomes and impacts within the PLM itself. Furthermore, both PLMs can be seen as living policy making and evaluating tools and will likely adapt with time.

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## Chapter 3 — Summary of Cost Benefit Analysis.

### Introduction and Background

Indecon International Consultants (‘Indecon’) were appointed by the Department of Education School Transport section (‘the Department’) to undertake a cost benefit analysis of the various options being considered under Phase 3 of the review of the School Transport Scheme, which builds on the analysis undertaken in Phases 1 and 2 of the review.

This chapter represents the independent economic appraisal completed by Indecon for the Department. The analysis is fully aligned with the requirements of the Public Spending Code and the Department of Transport’s Common Appraisal Framework.

### Overview of the School Transport Scheme

School Transport is a significant operation managed by Bus Éireann on behalf of the Department. In the 2019/2020 school year, just under 121,200 children, including just over 14,300 children with special educational needs, were transported on a daily basis to primary and post-primary schools throughout the country at a cost of over €224m in 2019/2020<sup>1</sup>.

The purpose of the Primary and Post-Primary School Transport Scheme is, having regard to available resources, to support the transport to and from school of children who reside remote from their nearest school.

The purpose of the School Transport Scheme for children with Special Educational Needs (SEN) is, having regard to available resources, to support the transport to and from school of children with special educational needs arising from a diagnosed disability. Growth in the numbers of children with special educational needs seeking school transport is a notable development in recent years. Numbers of children on SEN Transport have increased from over 9,200 pupils in 2012 to 17,500 pupils in the 2022/23 school year (11.6% of children provided for under the School Transport Scheme overall). The cost of the provision of SEN transport services in 2019/2020 was over 50% of the total cost of school transport services, at a cost of €121m. Growth in the number of children availing of transport on a concessionary basis on the primary and post-primary Transport Schemes is also a notable development in recent years.

Children are generally eligible for school transport if they satisfy the distance criteria (3.2km at primary and 4.8km at post-primary) and are attending their nearest school as determined by Bus Éireann, having regard to ethos and language.

At SEN level, children are eligible for transport where they have special educational needs arising from a diagnosed disability in accordance with the designation of high and low incidence disability set out in Department of Education and Skill’s (DES) Circular 02/05. Children must also be attending the nearest recognised mainstream school, special class/special school or a unit, that is or can be resourced, to meet their special educational needs. Eligibility is determined following consultation

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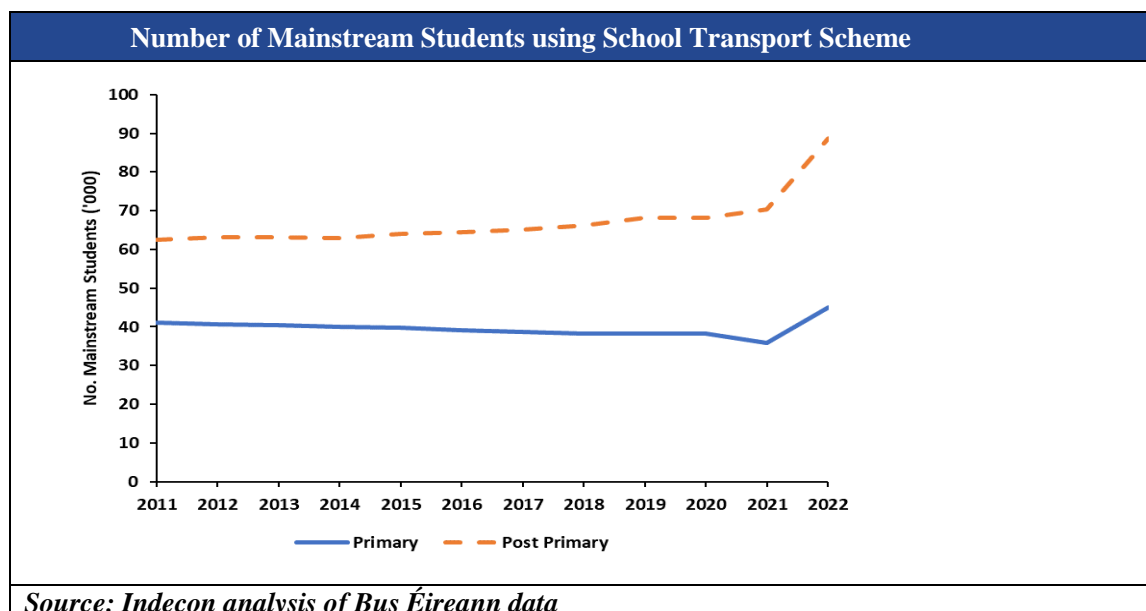
<sup>1</sup> The analysis in this report uses 2019/2020 as the base year given the impact of Covid 19 in the 2020/2021 and 2021/2022 school years and the move to free school transport in the 2022/2023 school year.



with the National Council for Special Education (NCSE) through its network of Special Education Needs Organisers (SENO).

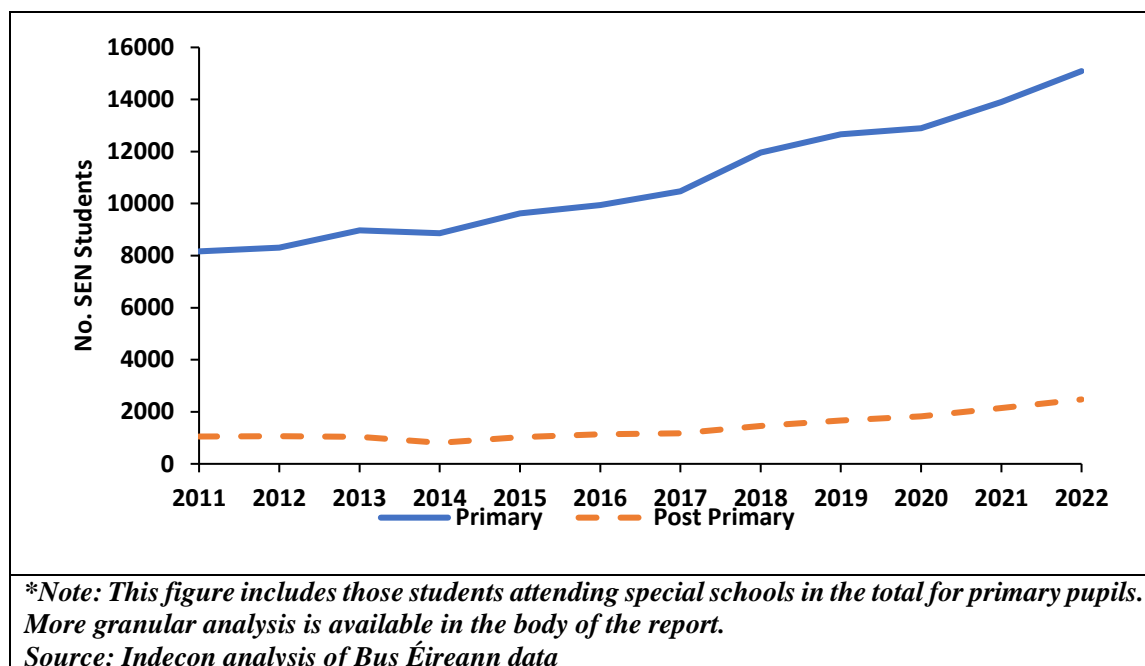
Changes to the School Transport Scheme (primary and post primary) were announced in Budget 2011 and derived from recommendations in the Value for Money Review of the School Transport Scheme (published March 2011). One of the changes at primary level was the cessation of the long standing “closest school rule” and at post primary the cessation of the long-standing catchment boundary area system to determine eligibility. Existing children at that time who were eligible for school transport and met the distance criteria of 3.2kms/4.8 kms respectively, retained their transport eligibility for the duration of their schooling, provided their circumstances did not change.

Table 3.1



The number of School Transport Scheme users in total between 2011 and 2021 increased by 2,603 students, an increase of 2.5%. This figure however was reflective of a reduction in the number of primary school students using the School Transport Scheme by 5,200 and an increase in post-primary users by 7,803. There was a significant increase in use of the School Transport Scheme in 2022 due to the waiving of fees. Total users increased by 27,569 or 26% between 2021 and 2022.

**Table 3.2** Number of SEN Students using School Transport Scheme

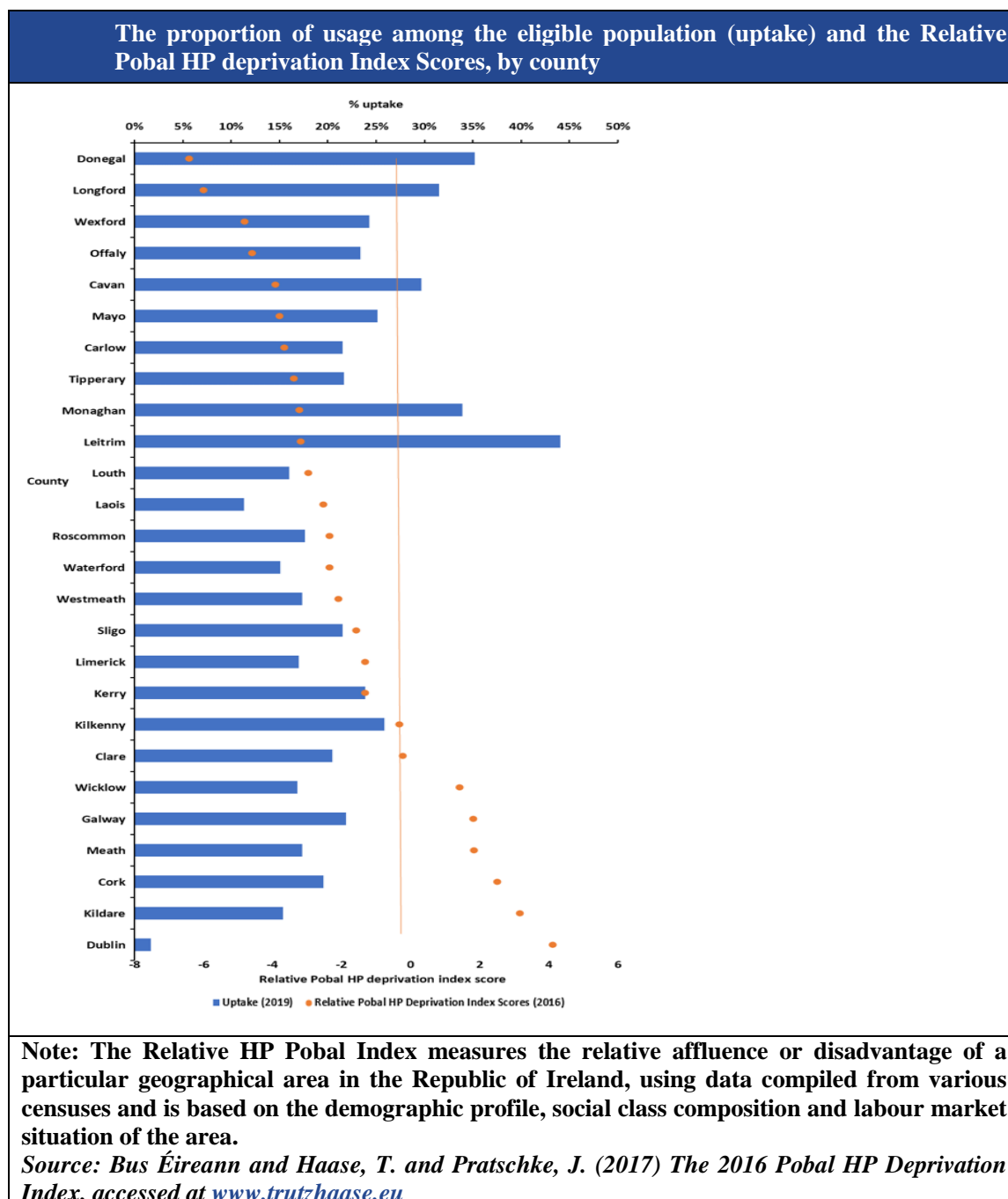


The figure above illustrates the number of SEN students, at primary and post primary level, students using School Transport Scheme from 2011 to 2022. The number of SEN users in total between 2011 and 2022 increased by 8,344 students, an increase of 90%. This figure however was reflective of a significant increase in the number of SEN students at primary level where student numbers increased by nearly 7,000 over the period. The increase at post-primary level was still significant in percentage terms but significantly lower in absolute terms with the number of students using School Transport Scheme increasing by 1,419 between 2011 and 2022.

The figure below demonstrates that the proportion of the school going population using School Transport Scheme services is typically higher in those counties with higher levels of deprivation as measured by the Relative HP Pobal Deprivation Index. The Pobal Deprivation Index is an area-based measure of deprivation accounting for the demographic profile, social class composition and labour market situation of the area. The counties at the top of the chart are those with the highest levels of deprivation.<sup>2</sup> Hence, the proportion of the school going population utilising School Transport Scheme services is typically lower in counties who are relatively less deprived, and which can be found towards the bottom of the chart.

Table 3.3

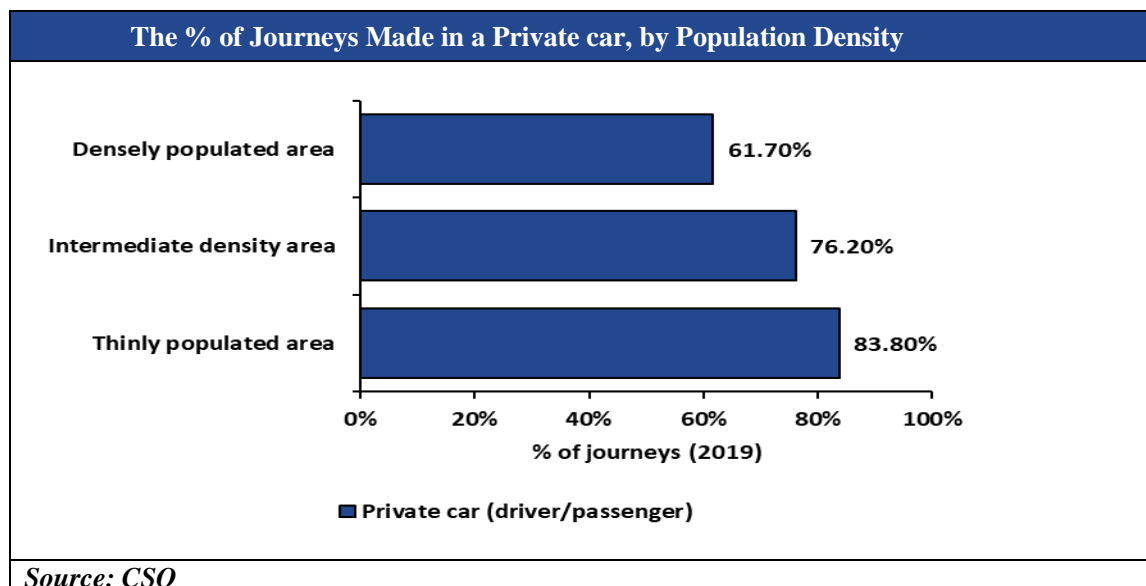
<sup>2</sup> The correlation coefficient between the School Transport Scheme uptake and the Relative HP Pobal Deprivation Index Score is negative (-0.601). Which means that higher levels of deprivation (lower index score) are correlated with greater uptake. See Annex 1 Table A.1



Other data presented in the body of the report further demonstrates that the uptake of School Transport Scheme is higher in rural areas as well. This evidence, coupled with the CSO data outlining the relative paucity of transport options in rural areas, demonstrates the importance of the School Transport Scheme to rural households. In the absence of the School Transport Scheme, these households would face a challenge in both the physical distance needed to take their children to school, and the lack of alternative transport options. Relatedly, the below figure shows that there is a higher dependency on private cars as a means of transport in more sparsely populated areas, as

highlighted in the Phase 2 report. This is indicative of the role that School Transport Scheme plays in reducing car dependency in these areas.

**Table 3.4**



### Options Appraised

Phase 2 of the Department’s review of the School Transport Scheme outlined five values which will underpin the overall direction of the scheme, and which inform the range of options to be assessed. These are:

- Distance – The minimum distance from a school at which a student must live, in order to be eligible for services.
- Ethos – The religious ethos of the nearest school
- Demand – Consideration of whether services should be provided to routes with user numbers above the current minimum threshold with consideration given to removal of routes with fewer than 10, 15 or 20 students and whether students should be eligible when attending the nearest and next nearest school.
- Inclusivity – the number of SEN students on mainstream services.
- Pricing – the cost per ticket for students to avail of services.

The options considered on the basis of the above values are outlined below. These options inform the demand projections undertaken subsequently which are an important basis of the financial and economic appraisals.

#### ***Counterfactual ‘As-Is’ Option (No Change option)***

It is important in any financial or economic analysis that an appropriate counterfactual scenario is specified. It is against this scenario that the costs and benefits of any other options will be measured.

For the purposes of the analysis in this report, the counterfactual scenario is a continuation of the School Transport Scheme as per the specification of the Scheme in 2019 in terms of distance criteria, price, ethos criteria and integration with SEN.

### ***Demand Led***

The demand led option is the option that is likely to lead to the highest numbers of school transport users by implementing the shortest eligible distance criteria of one kilometre for both primary and post-primary students, removing the nearest school criteria and offering free tickets. This option would also aim to provide routes for all students where there are more than 10 students. In terms of inclusivity, this option aims to integrate 5% of SEN students into mainstream services.

#### ***Option 1***

Option 1 reduces the distance criteria to 1km for primary students and 2km for post-primary students. As with the demand led option, the nearest school criteria is removed. Under this option a ticket administration fee of €50 per primary pupil and €75 per post-primary pupil is charged, but subject to a family cap of €125. This option also aims to incorporate 20% of SEN users on mainstream services.

#### ***Option 2***

Option 2 reduces the distance criteria to 2km for primary students and 3km for post-primary students. Students attending their nearest or next nearest school will be eligible under this option. Under this option a ticket administration fee of €50 per primary pupil and €100 per post-primary pupil is charged, but subject to a family cap of €200. Under this options routes with fewer than 10 pupils would be removed, or buses downsized. In terms of inclusivity, this option aims to integrate 10% of SEN students into mainstream services.

#### ***Option 3***

Option 3 would reduce the distance criteria to 2km for both primary and post-primary pupils. As with the above option, students attending their nearest or next nearest school will be eligible under this option. This option assumes a ticket administration fee of €100 per primary pupil and €200 per post-primary pupil, subject to a family cap of €400. Under this options routes with fewer than 15 pupils would be removed, or buses downsized. In terms of inclusivity, this option aims to integrate 15% of SEN students into mainstream services.

#### ***Option 4***

Option 4 assumes that the current distance criteria are maintained, with the exception of the imposition of a maximum distance criteria of 30km. Students living more than 30km from their school will thus not be eligible for the Scheme. Under this option, routes with fewer than 20 pupils would be subject to potential removal.

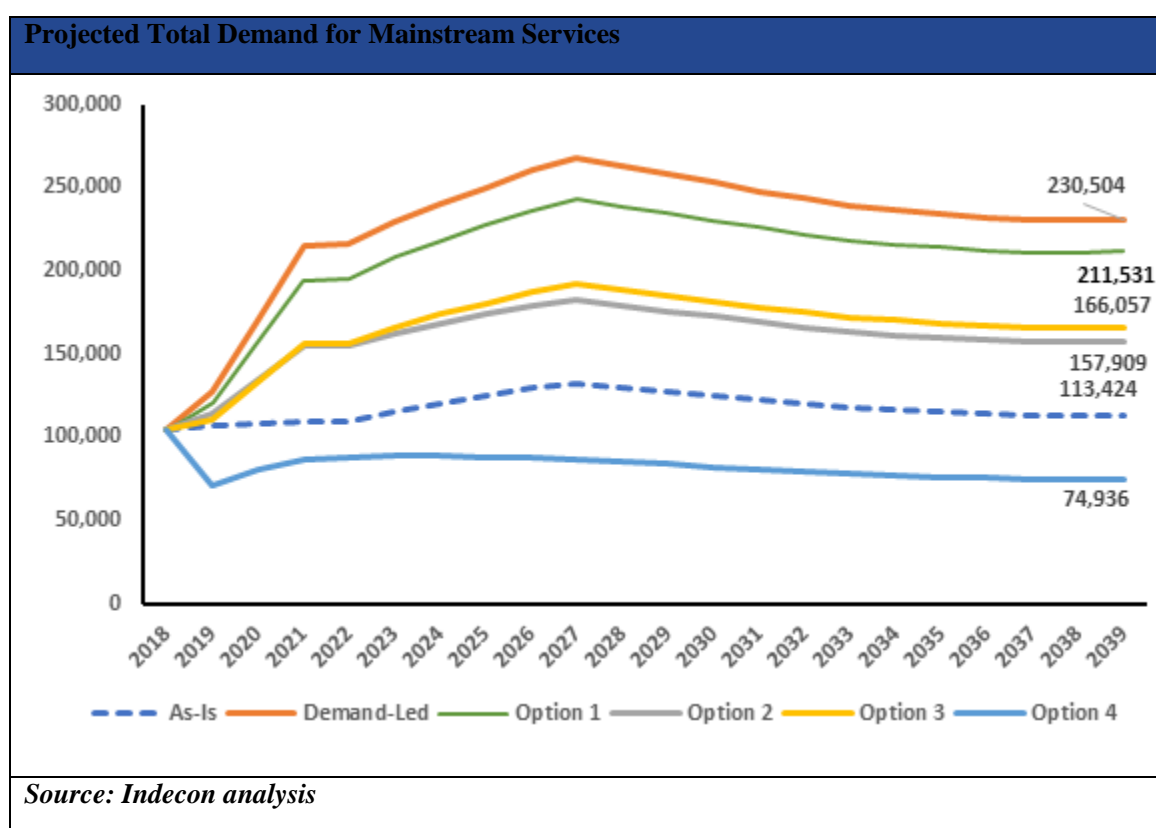
Under this option there would be an increase on the 2019 annual ticket charge to €200 for primary pupils and €400 for post-primary pupils. The family cap would be set at €700. This option is also assumed to introduce a minimum fee of €50 for SEN Transport and medical Card holders. This option also aims to incorporate 20% of SEN users on mainstream services.

## **Demand Projections**

Building on data from the Department and Bus Éireann including profiles of the current geographic distribution of School Transport Scheme users and projections for future trends in student numbers, as well as analysis of the likely impacts of different pricing policies, Indecon developed projections for

the likely demand for the School Transport Scheme under each of the options included in the appraisal. The findings of these projections at a national level are presented overleaf. All options project the total usage of mainstream service to peak in the short terms before slowly declining over the appraisal period. The demand led option is projected to lead to the highest demand for school transport services and it estimated to increase demand by 104% versus the most recent year for the As-Is option. This increased demand is largely driven by the less restrictive distance criteria under the demand-led option, but is also driven by the pricing change, and the assumptions concerning new applications from newly eligible students.

Table 3.5



### Financial Appraisal

The financial modelling is undertaken using the options specifications and usage estimates as described in the preceding sections of this report. As per Public Spending Code guidelines set out by the Department of Public Expenditure and Reform, a financial appraisal is key to understanding the cash implications of expenditure proposals. The analysis undertaken on each of the options for the School Transport Scheme is aligned with the guidance in the Public Spending Code with regards to key parameter values including the discount rate and the shadow cost of public funds.

This section first outlines some of the key assumptions underpinning the financial appraisal followed by a brief description of the costs and benefits included in the analysis. Following this, the findings of the baseline analysis are presented. This section concludes with a range of sensitivity scenarios testing the robustness of the baseline model findings to alternative assumptions.

### Methodological Approach and Key Assumptions

The financial analysis undertaken in this report complies with the requirements of the Public Spending Code in terms of modelling approach and key parameter values. A brief outline of some of these key parameter values and other underlying assumptions follows.

#### Discount rate

The latest financial discount rate cited by the Department of Public Expenditure and Reform for financial appraisals is 3.17%.

#### Treatment of Inflation

As per the requirements of the Public Spending Code, all values in the financial appraisal model are in nominal terms. The following indicative inflationary figures are used in this analysis:

Table 3.6

Inflation Figures Used in Financial Appraisal Model	
Years	Inflation Figure Used
2019-2023	5%
2024-2027	3.5%
2028-2039	2%

#### Cost Estimation

Detailed cost estimates were provided for 2011-2019 and comprise frontline, SEN and administrative costs. Costs are adjusted for inflation as per the above table, alongside any adjustments relative to the excess capacity in the system as described in more detailed in the next sub-section. Inflows for each option consist of the pupil contributions under each option.

Projected costs in the financial appraisal model are calculated by estimating the average mainstream cost per mainstream pupil (per year), average SEN cost per SEN pupil (per year) and average administrative cost for all pupils (per year). These average costs are then multiplied by the relevant usage numbers for each option to provide an overall estimate of project costs, alongside any relevant project inflows.

### Assumptions on Excess Capacity

Under the current system, there is a level of excess capacity whereby buses on certain routes are not full. It is important therefore to factor in this excess capacity in the modelling, which was 50,300 in 2019. However, the level of excess capacity varies across counties. This geographical disparity is reflected in the cost assumptions which are calculated on a per-county basis, based on the level of excess capacity per county.

The sum of the As-Is usage figures and this usable excess capacity figure gives a total *maximum* capacity under the current system. A comparison is carried out on each option's uptake to this maximum capacity (using 2019/2020 costs as the baseline costs) to inform the cost adjustments. Where uptake under an option is higher than the As-Is model, costs are scaled upwards accordingly. Note that, due to the nature of certain bus routes, it is highly unlikely that all excess capacity will be used, hence it is assumed that only half of all available excess capacity is used.

The level of excess capacity per county which is used in the model, for 2019/20 and 2022/23 is provided in the table overleaf.

For those models under which usage figures are higher than the estimated maximum capacity the cost is increased by the percentage difference between the projected uptake and the maximum capacity. Similarly for Option 3 – where usage figures are lower than As-Is figures – the cost is *decreased* by this percentage difference.

Table 3.7

Table 0.1: County Level Excess Capacity						
County	2019/20			2022/23		
	Post-Primary	Primary	Total	Post-Primary	Primary	Total
Carlow	11.7%	47.9%	29.1%	9.0%	37.0%	21.8%
Cavan	21.3%	47.0%	35.0%	14.7%	43.9%	29.5%
Clare	19.9%	50.0%	32.0%	9.0%	46.5%	24.3%
Cork	21.0%	40.9%	29.3%	14.7%	36.5%	23.4%
Donegal	25.2%	49.4%	36.3%	19.0%	48.8%	32.7%
Dublin	33.3%	32.1%	31.9%	26.6%	31.6%	29.3%
Galway	23.9%	50.3%	34.0%	15.4%	43.9%	25.7%
Kerry	25.4%	47.3%	35.2%	11.4%	38.7%	22.9%



<b>Kildare</b>	21.7%	45.7%	33.2%	13.7%	38.8%	25.2%
<b>Kilkenny</b>	26.4%	37.6%	32.7%	13.1%	33.0%	24.0%
<b>Laois</b>	21.9%	54.7%	35.2%	12.8%	45.8%	25.5%
<b>Leitrim</b>	17.9%	46.0%	33.1%	12.7%	40.6%	26.6%
<b>Limerick</b>	28.4%	44.8%	33.4%	15.4%	39.6%	22.3%
<b>Longford</b>	20.5%	51.2%	33.4%	10.4%	51.8%	26.8%
<b>Louth</b>	26.2%	39.5%	30.4%	8.5%	42.5%	18.5%
<b>Mayo</b>	23.1%	56.1%	38.0%	12.9%	53.4%	31.0%
<b>Meath</b>	18.7%	47.2%	33.2%	18.2%	39.0%	27.8%
<b>Monaghan</b>	32.7%	54.3%	42.8%	16.0%	53.6%	34.1%
<b>Offaly</b>	14.0%	56.1%	32.8%	9.8%	54.5%	28.5%
<b>Roscommon</b>	23.2%	52.3%	41.1%	15.3%	47.9%	34.5%
<b>Sligo</b>	25.8%	44.8%	35.0%	14.2%	37.4%	24.9%
<b>Tipperary</b>	21.0%	48.0%	33.1%	11.5%	44.5%	24.9%
<b>Waterford</b>	27.1%	46.7%	35.7%	15.7%	42.2%	27.0%
<b>Westmeath</b>	21.5%	52.2%	35.4%	14.9%	43.2%	25.8%
<b>Wexford</b>	19.5%	45.8%	30.6%	7.1%	41.3%	21.1%
<b>Wicklow</b>	26.7%	47.2%	36.1%	15.5%	46.3%	28.1%
<b>Source: Indecon Analysis of Bus Éireann Data</b>						

The financial appraisal has been undertaken in line with the requirements of the Public Spending Code and based on the projections and options specified above.

The findings of the financial analysis yield the following results, in NPV terms, for the mainstream School Transport Scheme and the SEN School Transport Scheme. The figures in these tables are presented in NPV terms and are net costs, i.e. they are cost estimates net of estimated revenues under each option.

It can be seen that the Mainstream School Transport Scheme does not make a positive financial return under any of the options considered here. The demand led model leads to a significant increase in the net financial cost of the scheme. When the results are considered relative to the As-Is option, Option 4 represents a net saving of €1 billion in NPV terms, while the other alternative investment options return significantly negative results.

Table 3.8

<b>Results of Financial Appraisal – Mainstream School Transport Scheme</b>		
	<b>Standalone</b>	<b>Net of As-is</b>
<b>Option</b>	<b>Financial Appraisal, NPV, €m</b>	<b>Financial Appraisal, NPV, €m</b>

<b>As-Is</b>	-€2,145	€0
<b>Demand-led</b>	-€4,379	-€2,234
<b>Option 1</b>	-€3,919	-€1,774
<b>Option 2</b>	-€3,091	-€945
<b>Option 3</b>	-€2,992	-€846
<b>Option 4</b>	-€1,139	€1,006
<i>Source: Indecon Analysis</i>		

The following table shows the findings of the financial appraisal for the SEN School Transport Scheme. Under each option the SEN does not make a positive financial NPV. Net of the As-is option, all of the options considered do however reduce this negative financial NPV, due to the impacts on costs of SEN students using mainstream services under these options. The most significant reduction in this negative NPV is under Option 4.

Table 3.9

<b>Results of Financial Appraisal – SEN School Transport Scheme</b>		
	<b>Standalone</b>	<b>Net of As-is</b>
<b>Option</b>	<b>Financial Appraisal, NPV, €m</b>	<b>Financial Appraisal, NPV, €m</b>
<b>As-Is</b>	-€3,894	€0
<b>Demand-led</b>	-€3,693	€201
<b>Option 1</b>	-€3,134	€761
<b>Option 2</b>	-€3,507	€388
<b>Option 3</b>	-€3,320	€574

<b>Option 4</b>	-€3,108	€786
<i>Source: Indecon Analysis</i>		

The combined impact of each option on the operation of the school transport scheme as a whole is outlined in the below table. When considered as a whole, Option 4 represents savings of €1.79 billion over the appraisal period relative to the As-is scenario. All other options continue to demonstrate a net increase in costs compared to the As-is scenario when considered as an integrated SEN and mainstream service.

Table 3.10

<b>Results of Financial Appraisal - SEN and Mainstream Combined</b>		
	<b>Standalone</b>	<b>Net of As-is</b>
<b>Option</b>	<b>Financial Appraisal, NPV, €m</b>	<b>Financial Appraisal, NPV, €m</b>
<b>As-Is</b>	-€6,040	€0
<b>Demand-led</b>	-€8,073	-€2,033
<b>Option 1</b>	-€7,053	-€1,013
<b>Option 2</b>	-€6,597	-€558
<b>Option 3</b>	-€6,312	-€272
<b>Option 4</b>	-€4,247	€1,792
<i>Source: Indecon Analysis</i>		

### Economic Appraisal

The following table illustrates the findings of this economic appraisal for each of the proposed options for the mainstream School Transport Scheme. This table demonstrates the net benefit and benefit to cost ratio (BCR) for each option both in gross terms and net of the counterfactual scenario which for this analysis is assumed to be a do minimum scenario in which the As-is approach continues over the appraisal period. The economic appraisal has been undertaken in accordance with the requirements of the Public Spending Code and the relevant parameters and guidance from the Common Appraisal Framework.

The modelling finds a small positive economic benefit for the As-Is option when modelled on standalone basis. The demand led option, option 1 and option 2 also have a positive BCR (Benefit to Cost Ratio) both in gross terms and net of the counterfactual, when considering the impact purely on the mainstream service.

The overall impact, accounting for the treatment of SEN pupils and potential costs savings from the integration of SEN pupils onto the mainstream service is considered subsequently.

The largest benefit under each option is the time savings to families from the number of individual car journeys foregone. These time savings benefits, modelled in line with the guidance in the CAF (Common Appraisal Framework), constitute around 65-70% of the total benefits under each of the options. Each option does include a positive economic benefit from reduced emissions, although the monetary value of these benefits is relatively small.

For the mainstream service only, when considered net of the counterfactual scenario, the highest BCR is found for option 1 at 1.09.

The highest benefit in absolute terms over the appraisal period is found under the demand led option and Option 1. However, the demand led option has the highest total costs driven by the largest number of users and the lack of any revenue inflows to support the scheme.

Option 4 has the lowest total benefits of all of the ‘do something’ options considered. This is accompanied by the lowest estimated net costs of operating the scheme due to the lower student numbers, the most significant reduction in routes with relatively low demand and the highest fee levels assumed across all the options.

The demand led option and option 1, while having the most positive BCRs, also provide significantly higher benefits in absolute terms and it should be noted also contribute most significantly towards the wider goals of modal switch articulated in the climate action plan.

Table 3.11

Results of Economic Cost-Benefit Appraisal – Mainstream School Transport Scheme (€ Millions) – (2019-2039)						
Benefits	As-is	Demand Led	Option 1	Option 2	Option 3	Option 4
<u>Emissions Savings</u>						
CO2	7.0	13.3	13.2	7.0	5.6	-9.3
NOX	-8.3	-12.6	-11.7	-10.4	-10.8	-13.9
PM2.5	-0.5	-0.7	-0.6	-0.6	-0.6	-0.9
Total	-1.8	0.0	0.9	-3.9	-5.8	-24.1
<u>Running Cost Savings</u>						
Fuel Costs	185.3	308.4	293.9	212.6	203.2	79.6
Non-Fuel Costs	167.6	278.8	265.7	192.2	183.7	71.8

Time Savings	1,554.6	2,627.2	2,505.4	1,793.6	1,724.6	657.9
Road Safety Outcomes	82.5	139.1	132.6	95.1	91.4	35.0
Savings v. private service	139.4	463.2	349.7	314.1	204.5	-52.4
Savings v. Do min	-	229.3	170.7	158.1	82.4	-231.3
<b>Total Benefits</b>	2,127.6	4,046.1	3,719.0	2,761.7	2,484.1	536.5
<b>Costs</b>						
Total Costs	2,217.9	3,811.4	3,555.1	2,834.1	2,882.6	1,429.4
Total Revenue	229.3	0.0	102.0	96.9	206.8	313.4
<b>Net Costs</b>	1,989	3,811	3,453	2,737	2,676	1,116
BCR	1.07	1.06	1.08	1.01	0.93	0.48
NPV (€ Millions)	139.0	234.6	265.9	24.5	-191.8	-579.4
<b>Net of Counterfactual</b>						
BCR	-	1.05	1.09	0.85	0.52	0.55
NPV (€ Millions)	-	95.6	126.9	-114.5	-330.8	-718.4
<i>Source: Indecon analysis</i>						

A similar analysis was completed for the SEN School Transport Scheme. The SEN School Transport Scheme does not provide a positive economic return under any option. However,

It is noted that the objectives of the SEN scheme extend beyond the quantifiable economic benefits included in this modelling. As such, these findings of BCRs of less than one do not indicate that the SEN scheme does not have merit as a means of achieving other policy goals with regards to providing assistance to the families availing of the SEN scheme.

The following table integrates the modelling of the mainstream and SEN services to give a holistic view of the economic impact of each option. The key consideration here is the impact of savings from moving SEN users to mainstream services. While this imposes additional costs for mainstream services, there is a significant net savings to the service as a whole given that users' costs on the mainstream services are significantly lower than those for the SEN Service.

The table below presents the findings of the analysis when the implications for SEN and mainstream services are considered in combination, both in gross terms and net of the counterfactual.

The gross analysis demonstrates the impact of the higher costs of the SEN scheme on the net benefit of the School Transport Service when considered on an integrated basis. All options have significantly negative BCRs and NPV when the costs of the SEN scheme are included.

However, this integrated model leads to an increase in the benefit to cost ratios and net benefits for each option when considered net of the counterfactual. Larger increases are observed for those options

which assume the most significant portion of SEN pupils accommodated on mainstream services, namely Options 1 and 4.

Under this integrated analysis, Option 1 has the highest BCR of 1.81.

Options 2 and 3 now also have positive BCRs. This shift is largely driven by the scale of the cost savings from the SEN pupils assumed to be accommodated on mainstream services under this option, the benefits of which surpass the net negative effects of this option on the mainstream service when appraised on a standalone basis.

Of those options which contribute more effectively to climate action plan objectives for model switch, Option 1 has the highest benefit to cost ratio of 1.81.

Table 3.12

Results of Economic Cost-Benefit Appraisal – Mainstream and SEN Combined – Net of Counterfactual (€ Millions) – (2019-2039)						
Gross (Mainstream and SEN)						
	As-is	Demand Led	Option 1	Option 2	Option 3	Option 4
BCR	0.50	0.65	0.67	0.56	0.53	0.25
NPV	-2,660	-2,416	-1,990	-2,494	-2,579	-2,829
Net of As-is (Mainstream and SEN)						
	As-is	Demand Led	Option 1	Option 2	Option 3	Option 4
BCR	-	1.15	1.81	1.40	1.40	0.90
NPV (€ Millions)	-	243	670	166	81	-170

*Source: Indecon analysis*

### Alignment of School Transport Scheme with Wider Policy Objectives

The school transport scheme is aligned with a range of wider national policy objectives with regards to facilitating future rural development<sup>3</sup>, improving rural connectivity<sup>4</sup>, and reducing car dependency<sup>5</sup>, as well as playing a significant role in reducing the emissions from the transport sector as outlined in section 15 of the Climate Action Plan (CAP). As such, while the school transport service has a primary goal of facilitating students in accessing primary and secondary school, it is aligned with and contributes to wider objectives under the CAP as well as the National Development Plan and National Planning Framework.

## Conclusions

This report has been undertaken by Indecon as part of Phase 3 of the review of the School Transport Scheme being undertaken by the Department of Education. The primary component of the research undertaken by Indecon has been the economic and financial appraisals of the options under consideration for the future operation of the Scheme. Both appraisals have been undertaken in line with the requirements of the Public Spending Code.

The financial appraisal demonstrates that the School Transport Scheme operates at a significant financial net cost to the exchequer. However, the subsequent economic appraisal shows that the Scheme has demonstrable wider economic benefits under all policy options. The fact that the School Transport Scheme operates at a financial loss is evidence of its role as a public service and demonstrates that in the absence of the School Transport Scheme, it is unlikely that any private services would fulfil the role of the existing School Transport Scheme. While private alternatives may operate on certain routes, the scale of the financial loss to operate the scheme at its existing and proposed levels of service imply that without the School Transport Scheme the majority of families would have to rely on alternative modes of transport to and from school.

The findings indicate that while Option 4 has the lowest level of financial losses and represents a significant financial cost saving, this option involves the lowest number of pupils on school transport and imposes the highest cost of school transport on users, both of which outcomes run contrary to wider government policies.

Of the other options which consider expansion of the number of users, Option 1 has the highest benefit to cost ratio at 1.81. The following table summarises the findings of the economic modelling for the integrated mainstream and SEN School Transport Scheme.

Table 3.13

**Results of Economic Cost-Benefit Appraisal – Mainstream and SEN Combined – Net of Counterfactual**  
(€ Millions) – (2019-2039)

<sup>3</sup> NSO 3 in the National Planning Framework.

<sup>4</sup> See NTA, Connecting Ireland: Rural Mobility Plan.

<sup>5</sup> See NSO 1, 3,4 and 8 of the National Development Plan with regards to sustainable development, rural development, environmentally sustainable public transport and climate action.

	Demand Led	Option 1	Option 2	Option 3	Option 4
BCR	1.15	1.81	1.40	1.40	0.90
NPV (€ Millions)	243	670	166	81	-170
<i>Source: Indecon analysis</i>					

It is noteworthy that while Options 2 and 3 have positive BCRs, and a higher BCR than the demand led option, the fact that these options provide school transport services to a smaller number of people over the appraisal period mean that it will make a significantly less substantial contributions to the targets as set out in the CAP with regards to the increase in public transport journeys and reduction in escort to education journeys. As such, the wider policy context should be considered when judging the above findings.

It should be noted that while the economic appraisal has included all costs and benefits of the Scheme which are readily quantifiable and monetisable, it is likely that there are benefits from school transport in terms of independence and life skills for students, as well potentially facilitating labour force participation and employment in rural areas and reducing road congestion. While these benefits are less readily monetised and included in the appraisal, they should not be discounted in the assessment of the role of the School Transport Scheme.

The key drivers of these economic benefits come from time savings for parents from car journeys avoided as well as the associated reduction in vehicle running costs. There is also a net benefit from the operation of the School Transport Scheme in emissions reductions, although the monetary value of these emissions based on the latest carbon prices<sup>6</sup> is small relative to the other benefits. Indecon understands that updated carbon prices are likely to be published in the coming months and these updated values may increase the monetary value of the environmental benefits of the School Transport Scheme.

Outside of the economic and financial appraisals, the analysis undertaken in this report has also demonstrated the role that the School Transport Scheme plays in supporting communities in rural areas. The evidence presented in the report indicates that reliance on the School Transport Scheme is also higher in areas with relatively high levels of deprivation and areas with lower urbanisation rates<sup>7</sup>. Additionally, these areas with higher levels of deprivation also typically have a higher proportion of School Transport Scheme runs with fewer than 10, 15 or 20 students. This finding has implications for the wider impacts of potentially reducing the provision of School Transport Scheme services for routes with relatively low levels of demand.

The research has also demonstrated that usage of School Transport Scheme services is higher in those rural areas where car dependency is higher. This has implications for the ability of School Transport Scheme to contribute to wider policy goals to reduce car dependency and emissions from the transport sector under the Climate Action Plan.

The analysis undertaken in this report has demonstrated the School Transport Scheme plays an important role in facilitating connectivity in areas of the country that are relatively poorly served by

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<sup>6</sup> As published in the latest publication from the Department of Public Expenditure and Reform: “*Valuing Greenhouse Gas Emissions in the Public Spending Code*” available at:

<sup>7</sup> See ‘Overview of School Transport Scheme’ section



public transport and are typically more deprived than more urban areas. The analysis has demonstrated that changes to the eligibility criteria for the School Transport Scheme may lead to significant increases in demand for School Transport Scheme services. Changes in eligibility, as well as projections for future student numbers indicate that there is likely to be significant demand for School Transport Scheme services over the coming years. The projected increase in usage of the scheme from broadening the eligibility criteria and lowering the prices is demonstrative of a likely latent demand for school transport services in the population that can potentially be activated by increasing the supply of the service. Activating this demand has potential significant benefits with regards to wider policy objectives to reduce car dependency, promote sustainable travel and reduce transport emissions. The economic analysis indicates that providing school transport services to meet this level of demand would represent a net economic benefit to wider society.

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## Chapter 4 – Scheme eligibility criteria

### Options considered for potential change to existing scheme eligibility criteria

As part of Phase 2 of the review, a number of potential options were proposed for the future operation of the scheme in order to ensure that the scheme can meet and deliver on its objectives. This included looking at potential changes to the current eligibility criteria in order to encourage more families to use School Transport Scheme services and to reduce the number of car journeys.

Building on the analysis as outlined in Chapter 3, in this chapter explores the potential options for change and make recommendations which are centred on 5 main values:

- Distance
- Ethos and language
- Demand
- Inclusivity
- Price

The 6 potential options explored are as follows with full details set out in the table below.

- Counterfactual “as-is” option - no change to current eligibility criteria.
- Demand led option - proposed distance criteria to be reduced on mainstream schemes to 1km, removal of the nearest school criteria and no ticket charge, In terms of inclusivity, this option aims to integrate 5% of SEN students on to mainstream services.
- Alternate Option 1 - proposed distance criteria to be reduced on mainstream schemes to 1km at primary and 2km at post-primary, removal of the nearest school criteria and reduced ticket charge. In terms of inclusivity, this options aims to integrate 20% of SEN students on to mainstream services.
- Alternate Option 2 - proposed distance criteria to be reduced on mainstream schemes to 2km at primary and 3km at post-primary, eligibility would be to nearest and next nearest school and reduced ticket charge, In terms of inclusivity, this option aims to integrate 10% of SEN students on to mainstream services.
- Alternate Option 3 - proposed distance criteria to be reduced on mainstream schemes to 2km at both primary and post-primary, eligibility would be to nearest and next nearest school and reduced ticket charge, In terms of inclusivity, this option aims to integrate 15% of SEN students on to mainstream services.
- Alternate Option 4 - assumes that the current distance criteria are maintained, with the exception of the imposition of a maximum distance criteria of 30km, an increased ticket charge, the introduction of a minimum fee for SEN Transport and medical cardholders. In terms of inclusivity, this option aims to integrate 20% of SEN students on to mainstream services.

	<b>As-is (2019)/Do Nothing</b>	<b>Demand led</b>	<b>Alternate Option 1</b>	<b>Alternate Option 2</b>	<b>Alternate Option 3</b>	<b>Alternate Option 4</b>
<b>Distance</b>	As 2019 (no TAMs)	1km for both Primary and Post-Primary (where there is no public transport alternative). No change for SEN scheme. *	1km Primary and 2km Post-Primary (where there is no public transport alternative). No change for SEN scheme. *	Reduce to 2km Primary and 3km Post-Primary (where there is no public transport alternative). No change for SEN scheme*	Reduce to 2km for both Primary and Post-Primary (where there is no public transport alternative). No change for SEN scheme *	Maintain current distances. Introduce a maximum distance on both schemes. (i.e. you will not be eligible to transport if you are travelling to a school more than 30km from your home where there are equal alternative schooling options within the 30km radius.) No change to SEN scheme *
<b>Ethos</b>	As-is – no change to current practice**	Match for both mainstream schemes**	As-is – no change to current practice	Match for both mainstream schemes	Match for both mainstream schemes	Match for both Mainstream schemes
<b>Language</b>	As-is – no change to current practice	As-is – no change to current practice	As-is – no change to current practice	As-is – no change to current practice	As-is – no change to current practice	As-is – no change to current practice
<b>Demand</b>	All eligible children who apply and pay on time would be catered for. Non-eligible children catered for where capacity exists after this.	Maintain all existing routes to existing schools and cater for all applicants who meet the distance criteria. (This eliminates nearest school criteria) In the case of a new school not served by an existing route or in the case of parental demand for a new route, consultation with PBU on planning area to be served to assist in route design establish a new route where minimum of 10 new applicants	Maintain all existing routes to existing schools and cater for all applicants who meet the distance criteria. (This eliminates nearest school criteria) In the case of a new school not served by an existing route or in the case of parental demand for a new route, consultation with PBU on planning area to be served to assist in route design establish a new route where minimum of 10 new applicants	Maintain all existing routes to existing schools and cater for all applicants who meet the distance criteria who are attending nearest and next nearest school on that existing route. In the case of a new school not served by an existing route, consultation with PBU on planning area to be served to assist in route design establish a new route where minimum of 10 new applicants  In addition routes would be removed/buses downsized based on less than 10 eligible applicants.	Maintain all existing routes to existing schools and cater for all applicants who meet the distance criteria who are attending nearest and next nearest school on that existing route. In the case of a new school not served by an existing route, consultation with PBU on planning area to be served to assist in route design establish a new route where minimum of 15 new applicants.  In addition routes would be removed/buses downsized based on less than 15 eligible applicants.	Review routes in line with school planning policy from PBU. Remove services not in compliance with the policy, and maintain only eligible routes where there are 20 eligible applicants. In the case of a new school, est. new route where minimum of 20 new applicants where in compliance with planning and building unit on school planning policy.

Inclusive	As-is	5% SEN on MS services	20% SEN on MS services	10% SEN on MS services	15% SEN on MS services	20% SEN on MS services
Pricing	As-is	Free tickets Increase grants (rate TBC)	Ticket admin fee of €50 per primary pupil €75 per post-primary pupil – family cap of €125 Increase grants (rate TBC)	Ticket admin fee of €50 per primary pupil €100 per post-primary pupil – family cap of €200 Increase grants (rate TBC)	Ticket admin fee of €100 per primary pupil and €200 per post-primary pupil – family cap of €400 Increase grants (rate TBC)	Sliding scale Increase on 2019 annual ticket charge €200 at primary, €400 at post-primary, family cap €700. Introduce a minimum fee of €50 for SEN Transport and medical Card holders. Increase grants (rate TBC)

\* Text of SEN scheme and circulars quoted therein to be reviewed in consultation with the Special Education Section and the NCSE.

\*\* Under current arrangements of the primary transport scheme, a child may bypass a closer denominational school to attend a multi-denominational school and vice versa. At post-primary, a child may only bypass a closer school (whether it be denominational or multi-denominational) to attend a minority religion school

## Current Scheme Eligibility Criteria

### *Primary School Transport Scheme*

Pupils at primary level are eligible where they live no less than 3.2 kilometres from and are attending their nearest primary school, having regard to language and ethos.

### *Post-Primary School Transport Scheme*

Pupils at post-primary level are eligible where they live no less than 4.8 kilometres from and are attending their nearest primary school, having regard to language and ethos.

### *School Transport Scheme for Children with Special Educational Needs*

Pupils are eligible for transport where they have special educational needs as set out in Department of Education (DE) Circular 02/05 and are attending the nearest recognised mainstream school, special class or special school, that is or can be resourced, to meet their special educational needs. Eligibility is determined following consultation with the National Council for Special Education (NCSE) through its network of Special Education Needs Organisers.

The following sets out the potential options for change under the values of:

4.1 - distance

4.2 - ethos and language

4.3 - demand

4.4 - inclusivity

## 4.5 - pricing

### 4.1. Distance criteria:

#### 4.1.a. Mainstream Distance Criteria

One of the proposed options from the Phase 2 report is to reduce or remove distance eligibility criteria on the mainstream schemes, As part of the feedback in both parental/pupil surveys it was suggested that distance eligibility should be reduced or abolished and the view was expressed that the current distance criteria is too high with 60% of parent's responses to the survey stating that, in their opinion that the current distance criteria is unreasonable and 75% indicating that it should be removed or decreased.

Being mindful of not reducing the distance to such an extent so as to discourage walking/cycling initiatives, it is worth noting that 81% of primary and 88% of post-primary children do not meet the national physical activity guidelines<sup>8</sup>. It is noted that 1 in 5 primary school children in Ireland are identified as overweight or obese<sup>9</sup>. The World Health Organisation (WHO) recommends a minimum 60 minutes of moderate to vigorous physical activity a day for children aged 5 to 17<sup>10</sup>. In order to achieve 60 minutes of daily exercise an average adult would need to walk just over 4km a day. Walking and cycling to school provide a convenient opportunity to incorporate physical activity into the daily routine of children and adolescents. Children and adolescents who actively commute to school attain more minutes of daily physical activity than those who use motorised transport.

It is also noted that as part of the stakeholder engagement process for this review that while there is general support for programmes to support walking, cycling and active travel to school, it is the case that for many children walking or cycling to school is not an option given the distance they live from their school of attendance, concerns over road safety and lack of street lighting or foot paths in many parts of rural Ireland or because of a child's special educational needs.

As stated earlier, one of the views expressed as part of the stakeholder engagement process was that distance criterion needs to be reviewed properly and exemptions developed for areas where there is a high concentration of students that have no alternative but to drive owing to the absence of walking or cycling infrastructure. The survey results showed that of the pupils currently on transport, 92% of all parents responded that their child could not walk or cycle to school as the road conditions were unsuitable or the distance was too far.

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<sup>8</sup> The Children's Sport Participation and Physical Activity Study. [http://www.doras.dcu.ie/21335/1/CCLSP\\_Study\\_Report1.pdf](http://www.doras.dcu.ie/21335/1/CCLSP_Study_Report1.pdf)

<sup>9</sup> The Childhood Obesity Surveillance Initiative (COSI) in the Republic of Ireland. <https://www.hse.ie/eng/about/who/healthwellbeing/our-priority-programmes/health/childhood-obesity-surveillance-initiative/cosi/childhood-obesity-surveillance-initiative-report-2020.pdf>

<sup>10</sup> WHO Global Recommendations on Physical Activity for Health. <https://www.who.int/publications/i/item/9789241599979>

It was also found during the Phase 2 analysis that in much of rural Ireland with narrow roads and no hard shoulders or footpaths, it is not always possible for children to walk or cycle, particularly during school term time when it is often dark before 5.00pm. More than 80% of road deaths in Ireland occur on rural roads, according to the Road Safety Authority and the Garda Síochána, despite more collisions in urban areas. It is worth noting that, beyond infancy, the leading cause of childhood death during 2006–2017 (26.5%) was accident and injury. Road Traffic Collisions accounted for the greatest proportion of accidental injury deaths (33%). From 1997-2012, 44% of child RTC fatalities were pedestrians, while 37% were car passengers<sup>11</sup>

This means that for most of the rural population, where school transport is not available, it can be expected that students will instead travel by private car, necessitating four trips between home and school each day and greatly increasing car journeys and carbon emissions. An EPA report<sup>12</sup> published in 2020 estimated 1,300 premature deaths per year in Ireland due to air pollution.

The parental survey also found that support for working parents was the top parental response as to the reason that school transport is important to parents. A total of 77% of parents (6,298 parents) stated that they rely on the STS to facilitate them in attending work and, for those who do not use it, over 52% said that their children would use it if they could as it would help them to attend work.

The evidence to support this aid for working parents can be seen in the 2021 National Travel Survey in the analysis of Escort to Education Journeys,<sup>13</sup> from which it is seen that, in the main, female drivers made up the larger share of Escort to Education journeys.

As per the CSO data for 2016, some 60% of primary school pupils, almost triple of what it was a generation ago and 42% of post primary pupils, are driven to school.

According to the National Travel Survey 2021, one fifth (20.7%) of all journeys in 2021 were companion/escort journeys, up marginally from 2019 (20.0%). Females were nearly twice as likely as males to make an escort journey – 26.1% of females (up from 24.7% in 2019) compared with 15.3% of males.

One fifth of all journeys (20.6%) in 2021 were made between 07:00 and 09:59, when persons might be travelling to work, dropping children to school, etc. Another one fifth (20.9%) of all journeys in 2021 were taken during lunchtime and early afternoon, between 13:00 and 15:59. Over one in five (22.4%) journeys taken by females were during these time periods. By comparison, less than one in five journeys taken by males were made during these times, with nearly 25% of men travelling between 16:00-18:59. Women between the ages of 25 to 54 make a far greater number of journeys at these time zones than their male counterparts or women outside of these age group. Therefore, by

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<sup>11</sup> RSA Child Casualties Resport 1997-2012.

<sup>12</sup> [Monitoring & Assessment: Air Publications | Environmental Protection Agency \(epa.ie\)](https://www.epa.ie/publications/monitoring--assessment/air/air-quality-in-ireland-2019.php)  
<https://www.epa.ie/publications/monitoring--assessment/air/air-quality-in-ireland-2019.php>

<sup>13</sup> Escort to Education journeys are journeys where the purpose of the respondent's journey is to collect/escort somebody to their place of education.

reducing distance this would enable more children to be eligible for transport, increasing uptake and thus facilitating greater access to the labour market for working parents.

For the 52% of parents surveyed who would use it as it would help them to attend work a considerable number of these parents' children are not currently eligible for transport as they live closer to their school than the 3.2km or 4.8km required eligible distance. For some of the 77%, or 6,298 parents, that stated that they rely on school transport in order to attend work, their children are part of the 37% of primary and 24% of post primary pupils currently travelling on school transport services on a concessionary basis and may not get a ticket every year due to not meeting the current distance criteria.

In the CBA, conducted by Indecon as part of this review, the most significant benefit identified as part of their economic analysis was the benefit of value of time saved by the parent. Time saving on travel allows the parent to contribute to society in other forms of economic benefits such as the labour force participation, addressing health and wellbeing needs.

In reviewing the current distance criteria it is also important to consider the targets set out in the Climate Action Plan 2023. The Climate Action and Low Carbon Development (Amendment) Act 2023 requires Ireland to achieve a 51% reduction in emissions by 2030 (relative to 2018 levels) and net-zero emissions no later than 2050. The Government's climate action targets include a commitment to increase the number of journeys taken using sustainable travel (public transport, cycling and walking) by an additional 125,000 sustainable journeys by 2025 and a 30% shift in escort to education car journeys to sustainable modes by 2030.

The CAP 2023<sup>14</sup> identifies escort to education journeys as representing a “significant component of travel demand” and thus contributing to the transport sector's overall GHG emissions. CAP 2023 sets out how change will be achieved in regard to reducing GHG emissions using the Avoid-Shift-Improve framework which prioritises actions including those which achieve the systemic and behavioural change that will be required to achieve the emissions abatement required in transport, not just for 2030 but also by 2050. Set out under the transport measures of the CAP 23 are specific “Shift” measures which are designed to encourage modal shift to more sustainable modes of transport. The School Transport Scheme and other measures are included in this context, which sets out a target of a 30% reduction in private car escort-to-education journeys by 2030.

Higher uptake in forms of public transport via the School Transport Scheme, would also significantly contribute to meeting the CAP23 2030 targets of a 20% reduction in total car kilometres, a 50% reduction in fuel usage and significant increases to sustainable transport trips and modal share. Increasing the number of students who avail of School Transport would more specifically address the 30% shift of E-to-E target as laid out in CAP 2023.

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<sup>14</sup> <https://www.gov.ie/pdf/?file=https://assets.gov.ie/256997/b5da0446-8d81-4fb5-991e-65dd807bb257.pdf#page=null>  
Pages.199-200.

A total of 27% of the current primary pupils meet the current distance of home to school of 3.2km and 46% of post primary pupils meet the current eligible distance of home to school of 4.8km as shown. However, the level of up-take of school transport is significantly lower. The current level of uptake of school transport is just 5% of the total primary student population and 17% of the post primary student population.

Evidence suggests that reducing the distance criteria will immediately shift some escort to education (E-to-E) car journeys onto school transport. To reach the E-to-E target by 2030, the STS would be expected to increase the number of pupils utilising the service by 13,500 per annum - with 2019 pupil numbers as the base year.

Consideration of the impact and implications that the Safe Routes to School Programme will have on active travel is important to bear in mind when considering distance. An Irish study in 2008<sup>15</sup> found that distance is an important perceived barrier to active commuting and a predictor of mode choice among adolescents. A 1.6km increase in distance from school decreases the likelihood of active commuting by 71%. This study also showed that the majority of those who walked lived within 2.4km of their school. Over 90% of adolescents who perceived distance as a barrier to active commuting lived further than 4km from school.

Another study in Belgium<sup>16</sup> found that the walkable distance to school varied based on age. For children aged 11 or 12, 1.5 kilometres was a walkable distance. For teenagers around 17 or 18 years old, the walkable distance was two kilometres. A similar study in the United Kingdom<sup>17</sup> found that walkable distances varies across age groups and increases with age. For ten year olds, roughly 1.4 kilometres is a walkable distance. For 11-year olds that distance increases to about 1.6 kilometres. For 14-year olds, it is about 3 kilometres.

The 2021 Irish National Travel survey results also shows that the majority of active travel journeys were short in duration. Over seven in ten (71.7%) journeys by bicycle were less than 15 minutes long, as were nearly six in ten (58.2%) trips by foot. One in five trips by cycling or walking were between quarter of an hour and half an hour in length. This walking time would represent a journey distance of a little over 2km for the average adult. As stated earlier WHO's recommendations on active levels for 5 to 17 year olds is 60 minutes a day. According to the rules of Athletics Ireland, the recommended maximum racing distance for 12-13 age group is 2km, 3km for 14-15 age group and 5km for 16-18 age group.

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<sup>15</sup> Reference (Nelson, N.M., Foley, E., O'Gorman, D.J. *et al.* Active commuting to school: How far is too far?. *Int J Behav Nutr Phys Act* 5, 1 (2008).

<sup>16</sup>Van Dyck, D., De Bourdeaudhuij, I., Cardon, G. *et al.* Criterion distances and correlates of active transportation to school in Belgian older adolescents. *Int J Behav Nutr Phys Act* 7, 87 (2010).

<sup>17</sup> Chillon, P.; Panter, P.; Jones, A.P.; and Van Sluijs, E.M.F. (2014). A longitudinal study of the distance that young people walk to school. *Health & Place*, 31.



It is also important to note Indecon’s Cost Benefit Analysis of the options highlighted shows that options with eligibility criteria of lower distances led to higher net benefits and have higher Benefit to Costs ratios than those options with higher distance eligibility criteria as set out in option 4 and As-is option. The CBA illustrates that option 1, where the distance is set at 1km for primary and 2km for post-primary schools leads to the highest net benefits in absolute terms over the entire appraisal period and assists greatly in reaching the CAP23 targets.

It is considered that the current distance criteria on the primary and post-primary schemes should be reduced with the optimum distance being 1km at primary level and 2km at post primary as this allows for the highest net benefits over the appraisal period and assists in reaching 69%% of the escort to education targets as set out in the CAP23. This should not apply in cities and certain towns<sup>18</sup> where public transport is widely available. In such cases pupils will not be eligible for the School Transport Scheme and instead will be redirected to public transport options in their area. In that context, further interdepartmental engagement is required to scope the future alignment of public transport options for school going children in these areas.

Any additional demand brought about by implementing this recommendation, both school transport and public transport may require significant investment in fleet and drivers and its implications need to be investigated further. Work has commenced on a coordinated Government approach in relation to potential demand issues as part of the National Demand Management Strategy which is being led by the Department of Transport.

Presently, in certain areas in the country, Bus Éireann is experiencing difficulties in sourcing private contractors to run certain routes due to shortages of drivers and vehicles. As part of this review the Department of Education has discussed these issues with the Department of Transport, and it is recommended that additional investment needs to be made available in this area in order to attract operators into the transport area so as to enable the Department of Education to meet its targets under the Climate Action Plan to reduce escort to education journeys and to support a 30% shift to sustainable modes of travel. It is highly likely that the transformation of the school transport fleet could significantly lag the rest of public transport in Ireland without active investment. Some cross-Departmental consideration should be given to this and incentives and investment that would introduce lower emission vehicles to the service. Key consideration will also have to be given to EPA guidelines in relation to sustainable procurement for contracted services going forward from 2023.

Over 90% of school transport is provided by private contractors, and vehicles are permitted to operate on the scheme until they are 20 years old. It is noted that there are grants available to support contractors with the purchase of low emission/electric vehicles – the “alternative fuel heavy duty vehicle” (AFHDV) purchase grant scheme which is administered by Transport Infrastructure Ireland

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<sup>18</sup> Cities and towns with public transport are Cork City, Cobh, Letterkenny, Dublin, Galway, Tralee, Kilkenny, Limerick, Drogheda, Navan, Bettystown-Laytown, Monaghan, Athlone, Sligo, Waterford, Wexford and Bray,

(TII). Under this scheme a contractor can make an application for a grant towards the cost of buying a lower emission vehicle. The level of grant awarded depends on the size of the company and the size of the vehicles and can be 20% to 40% of the differential in the cost of a diesel vehicle and an electric vehicle. For example, if the cost of a new diesel bus is €120k and the cost of a new electric bus is €200k, up to 40% of the differential in the cost – 40% of €80k – can be given as a grant towards the purchase of the new electric vehicle. A maximum of €500k or grant aid for 20 vehicles is available per company applying.

Given the resource constraints (both in terms of vehicles and drivers) that are being experienced in the current year, it is considered that a gradual approach to the reduced distance criteria will be rolled out as described below.

#### Recommendation: 4.1a

It is recommended that the current distance criteria on the primary and post-primary schemes should be reduced, with the optimum distance being 1km at primary level and 2km at post primary to school of attendance, with the exception for all cities and certain towns where public transport is widely available. This will require consultation with the NTA on town boundaries to be served by public transport- in this scenario, pupils will not be eligible for the School Transport Scheme where they can avail of public transport. This distance criteria allows for the greatest net benefits over the appraisal period as identified in the CBA report and is the minimum criteria that needs to be met to reach 69% of the Climate Action Plan 2023 targets. These distances also align to active travel initiatives, allow for greater support for working parents and align with many other rural initiatives including Safe Routes to Schools, improved road safety, health benefits and other Government approved plans/programmes such as Connecting Ireland, Our Rural Future and the National Planning Framework.

To allow for gradual building of capacity within the scheme and to effectively transition to the distance criteria as set out in Option 1, the first shift in the distance criteria will be to 2km at primary level and 2km at post-primary level. This initial reduction to 2kms on both schemes should be implemented with effect from the start of the 2024/2025 school year.

The next step in implementing the distance criteria as per option 1 would be to reduce the distance criteria to 1km at primary level (but to remain at 2km for post primary students). This distance criteria of 1km at primary and 2km at post-primary should be implemented for the start of the 2025/2026 school year.

#### 4.1. b. Distance eligibility criteria for Special Educational needs transport

As part of the stakeholder engagement process one of the findings was that the SEN Transport Scheme supports many children in attending specialist school placements which they may otherwise not be able to attend. Many children attend special classes and special schools that are a substantial distance from their home. The SEN School Transport Scheme is highly valued by these families who due to their requirements such as transporting other siblings to school, lack of their own transport and other additional commitments may not be able to transport their child to the special class/special school in which their child is enrolled.

Many children due to their special education needs may not be able to access mainstream school transport or public transport. The SEN school Transport Scheme provides an appropriate environment (with escorts where required) which facilitates children with special education needs traveling to school.

However, as identified in the earlier phases of this review, children with special educational needs should be educated, wherever possible, in an inclusive environment and that those with special educational needs should have the same rights to appropriate education as children without special educational needs. The School Transport Scheme should support this and ensure where possible that children with special educational needs can travel in an equitable manner on services with their siblings and peers.

It is also noted that while a significant majority of parents/guardians who responded to the survey conducted as part of Phase 2 of this review stated that they would prefer for their child to travel on a dedicated SEN service, some also indicated that if there was School Bus Escort support on the mainstream services, they would consider it as a viable option. Therefore, in order to make the School Transport Scheme a more inclusive scheme, certain additional supports will be required to do this where feasible. It is recognised that the scheme should provide greater options for children with special needs which are suited to their age and development and which should take account of children's emerging and developing needs. In saying this, it is recognised that for some children with special educational needs, dedicated or bespoke transport services will continue to be required in order to attend school, given either the nature of their special needs or the location of their school.

It has also been identified in earlier phases of this review that the cost of the SEN scheme has increased steadily in recent years. In 2011, the breakdown of the total cost of operating the scheme were as follows - 52% mainstream related costs, 35% SEN related costs and 13% administration related costs. In 2019 the spend profile has shifted to 54% SEN related costs, 38% mainstream related costs and 8% administration related costs. Based on the analysis in Phase 1 of total projected costs to operate the scheme, the SEN scheme element of these costs looks set to continue to be the main cost driver and could potentially be almost 70% of the overall cost to operate the scheme, by the year 2027. It is recognised that measures to reduce costs where possible, and to do so through the integration of mainstream and SEN services need to be pursued to ensure the fiscal sustainability of the scheme. However, it is also important to note that there is and will continue to be growth, in the number of children with special needs, which is in the region of between 3.5% and 5% per annum.

This growth in the numbers of children with SEN and the supports required, and the costs of those supports, is happening across Government Departments and the wider public sector.

The potential to provide for inclusivity on mainstream services will be supported by the provision of more special class being available locally, thus reducing the need for children to travel longer distances in order to avail of special class places. As set out in the National Development Plan, the Department and NCSE are proactively planning for and delivering significant investment in Special Education accommodation, particularly SEN class provision at post primary level. The Department and the NCSE continues to plan for additional SEN accommodation provision to meet future needs across the country. It is noted that the Department and the NCSE envisage that in the next 3 to 5 years it will be necessary to have special classes in all post-primary schools and, building on the extensive planning work in recent years, are currently undertaking a thorough review of available data to inform forecasting work on the level of need for new special classes in the post-primary system for the 2023/2024 school year and beyond. This will generate a forecast of the requirement at local school planning area level.

It is also noted that in planning a school placement for a child generally, the NCSE has regard to a number of factors including the suitability of a proposed placement and the geographical distance from a child's home. Currently every effort is made to minimise distance and time in getting to and from school.

As set out in Phase 2 of this review, School Transport Section will continue to work with the Department's School Planning and Building Unit and the National Council for Special Education (NCSE) to work towards a more inclusive and integrated approach for children with special educational needs. As the provision of SEN classes' increase at a local level, school transport requirements will reduce but this will happen over time as more students with SEN are provided with suitable educational placements closer to their home address. This will in turn reduce the distance that many children have to travel and, as highlighted in Phase 2 of this review, it is generally not in a child's best interest to travel long distances to school.

This collective collaboration aims to ensure that education for children with SEN, suited to their needs, is appropriately dispersed across school planning areas. This will ultimately reduce the journey time and distance for children on school transport services, respond to individual circumstances and will allow for further potential to integrate SEN and mainstream services where possible and appropriate, taking into account the care needs and the emerging and developing needs of the children involved.

It is therefore recommended not to change the current eligibility criteria for the SEN scheme, in that the scheme will continue to provide transport for eligible children to the nearest school that is or can be resourced to meet their special educational needs. Eligibility will continue to be determined in consultation with the National Council for Special Education and their network of Special Educational Needs Organisers.

#### Recommendation 4.1.b

It is recommended that there currently be no changes to the eligibility criteria for this scheme, in that the scheme will continue to provide transport for eligible children to the nearest school that is or can be resourced to meet their special educational needs and that this will continue to be determined in consultation with the NCSE. It is recommended that the review process for SEN services that is currently in place be continued for circumstances such as a child's needs changing/developing or a school place becoming available closer to the child's home in a school that is resourced to meet the child's needs. Changes to the current application process are dealt with fully in Chapter 5 of this report.

It is further recommended that a Working Group be established to comprise members of School Transport Section and Special Education Section of the Department, the National Council for Special Education and Bus Éireann to facilitate and enable ongoing improvements to the scheme. It is recommended that this group be established by the end of 2023 and that terms of reference for the group are agreed within that timeframe also.

It is noted that there is work underway between the Department and the NCSE which could support the work of this Working Group, including a review of special class placements and a review of the transition between primary and post-primary school for children with special educational needs.

This group should also consider the implementation of measures to support active travel for the benefit of SEN children where possible.

## 4.2 Ethos and language criteria:

This value has two different criteria - ethos and language. Each will be looked at separately.

### 4.2a. Ethos

One of the issues raised as part of the stakeholder engagement process was the issue of ethos being treated differently at primary and post-primary for consideration for eligibility.

It was expressed that while the current primary and post primary schemes as published are worded in the same way with regard to ethos, there is disparity in practice between schemes in terms of the treatment of ethos.

Under current arrangements of the primary transport scheme, a child may bypass a closer denominational school to attend a multi-denominational school and vice versa. However at post-primary, a child may only bypass a closer school (whether it be denominational or multi-denominational) to attend a minority religion school.

As part of the analysis for this review, it is noted that patronage of second level schools is quite different than at primary level. There is greater diversity in the types of patronage at second level which in quite a few cases can involve more than one patron.

In 2021/22 there were a total of 731 post-primary schools. Within this total, there were four types of post-primary school, with differing patronage structures. The four types and their numbers are set out below:

### Voluntary Secondary Schools

The majority of voluntary secondary schools (339 schools) are under Catholic denominational patronage (mainly Bishops/Educational Trust Companies/Religious Congregations).

A further thirty eight voluntary secondary schools are under the patronage of the Church of Ireland (17 schools), Educate Together (17 schools) and An Foras Pátrúnachta (4 schools). The remaining 8 voluntary secondary schools include other patron structures and the minority religious denominations (Jewish, Methodist, Presbyterian and Quaker).

### ETB schools

The 250 ETB schools are all under the patronage of the particular ETB area in which they are located. The bulk of which have a multi-denominational ethos with most of the other schools having an inter-denominational ethos.

### Community Schools

The 82 community schools all have joint patronage arrangements, consisting in the main of ETBs and Catholic congregations and/or a bishop. Two community schools have a patron structure of an ETB and a limited company, Educate Together.

### Comprehensive Schools

The 14 Comprehensive Schools are denominational in operation (5 have a Church of Ireland ethos, 1 has a Catholic ethos, 8 are Inter-denominational).

Current policy is that eligibility for school transport is to the nearest education centre/school subject to limited exceptions. An education centre typically involves a number of post-primary schools within a town and acts a central point for students availing of school transport to attend any of the schools in the town.

With regard to the patronage of primary schools, there is significantly less diversity of provision. In 2021/22 there were a total of 3,104 primary schools. 2,751 of these schools had a Catholic ethos and

the majority of them are under the patronage of the Catholic Church. A further 190 schools had a denominational ethos and are under the patronage of one of the minority religious denominations (Church of Ireland, Presbyterian, Quaker, Methodist, Muslim, Jewish). 17 schools have an Inter-Denominational ethos, of which the majority come under the patronage of An Foras Pátrúnachta (15). 146 schools have a multi-denominational ethos and the vast majority are under the patronage of Educate Together (84), An Foras Pátrúnachta (23) or the ETBs (26).

The School Transport Scheme has regard to ethos and language in that exceptions to eligibility for the scheme are considered in the case of minority religions and the Irish language. The scheme at Post Primary level provides transport for children of minority religion for whom there is less choice of school given the dispersed nature of these schools and also facilitates the viability of those minority religion schools.

#### Recommendation 4.2.a

It is recommended that there be no change to the current eligibility criteria with regard to ethos, in that transport should be provided to the nearest school having regard to ethos. However, it is recommended that the wording in the published schemes be updated to reflect the different manner in which ethos is treated on the primary and post-primary schemes. The schemes should be re-written and published in advance of the application process for the 2024/2025 school year.

#### 4.2.b Language criteria:

Under the terms of the schemes currently, children are eligible for transport at primary level where they reside not less than 3.2 kilometres from and are attending their nearest primary school, and at post primary level where they reside not less than 4.8 kilometres from and are attending their nearest post primary school/education centre as determined by the Department/Bus Éireann, having regard to ethos and language.

In effect this means that a child may bypass their nearest all-English school to attend their nearest all-Irish school or Irish unit, or vice versa they may bypass their nearest all Irish school to attend their nearest English school.

No issues were raised during the review about this criterion and it is therefore not intended to change this as part of the review process. The scheme facilitates access for children to their nearest all-English or all-Irish school/unit.

#### Recommendation 4.2.b

It is recommended that there be no change to the current eligibility criteria with regard to language, in that transport should continue to be provided to the nearest school having regard to language. The

scheme should continue to facilitate access for children to their nearest all-English or all-Irish school/unit.

### 4.3 Demand

This value has three criteria - concessionary applications, minimum numbers and nearest school. Each will be looked at separately.

#### 4.3.a Concessionary Applicants

Currently, children who are not eligible for school transport under the terms of the scheme, may apply to Bus Éireann for transport on a concessionary basis subject to the following conditions:

- a Transport Application Form is completed and submitted to Bus Éireann;
- there is a suitable service, as determined by Bus Éireann, operating into their education centre;
- there is spare capacity on the service;
- routes will not be extended or altered, additional vehicles will not be introduced, nor will larger vehicles or extra trips using existing vehicles be provided to cater for children travelling on a concessionary basis; no additional State cost will be incurred;
- the appropriate annual charge is paid; Medical Card waiver is not applicable

The availability of concessionary transport may vary from year to year, and cannot be guaranteed for the duration of a child's education cycle. Where the number of applications for transport on a concessionary basis exceeds the number of seats available, concessionary applicants are allocated a ticket in line with an agreed selection process and based on the availability of a seat when all eligible children have been catered for.

As referred to earlier, a considerable number of current pupils on School Transport are not eligible for the scheme, yet a large portion of these pupil's parents rely on School Transport to assist them in getting to work, as is evident from the stakeholder engagement process

The main reasons for their concessionary status is as follows.

The % of Pupils who are not eligible as they are under the distance criteria but are traveling on school transport service is as follows:

- 38% of primary pupils
- 24% of post primary pupils.



The % of Pupils who are not eligible as they attend their second nearest school but meet the distance criteria to their nearest school and are traveling on school transport service is as follows:

- 26% of Primary pupils
- 51% of Post Primary pupils

The % of current concessionary ticket holders based on both distance and next nearest school criteria are:

- 64% Primary pupils
- 75% post primary pupils

Indecon's Cost Benefit Analysis of the options shows that options with higher eligible student numbers lead to higher net benefits and have higher Benefit to Costs ratios than those options with lower number of eligible pupils, as set out in Option 4 and As-is option. The CBA illustrates that option 1, which eliminates the nearest school criteria and reduces distance criteria leads to the highest net benefits in absolute terms over the entire appraisal period and assists greatly in reaching 69% of the CAP23 targets.

It is also noted with regard to concessionary transport that as part of the feedback from the parental surveys and annual correspondence with parents and public representatives, it is considered that using the term "concessionary" can cause confusion. In some cases it is believed that a concessionary ticket is an annual entitlement. It can also cause distress and frustration for families who may have been granted a concessionary ticket for a number of years who then lose out on getting a ticket, particularly in the latter years of their child's education in their school of attendance.

In recommending as part of this review that the current distance criteria be reduced, that the nearest school criteria be removed and that all existing routes be maintained, the number of children who are concessionary will be greatly reduced, with in effect those who live under the distance criteria of 2km and 1km at post-primary and primary respectively being deemed not eligible. As stated in the section above with regard to the recommended distances as set out earlier, it is considered that children who live under this distance to their school of attendance should be encouraged to walk or cycle to school.

The term concessionary should be replaced with the term "not eligible" so that there is clarity that for some pupils they will not be eligible for School Transport Scheme services. Children who are not eligible may still apply for school transport within the prescribed application timelines but will only be accommodated where capacity exists once all eligible children have been catered for, such tickets will be referred to as a "spare seat ticket".

### Recommendation 4.3.a

It is recommended that the term concessionary ticket be removed from the scheme and will be replaced with the term "not eligible".

Children who are not eligible may still apply for school transport within the prescribed application timelines but will only be accommodated where capacity exists once all eligible children have been catered for, such tickets will be referred to as a “spare seat ticket”.

In addition children who are eligible but apply/pay late will only be accommodated where capacity exists once all children who have applied and paid on time have been catered for such tickets will be referred to as a “spare seat ticket”.

The published schemes should be re-written to reflect this change in time for applications for the 2024/2025 school year.

#### 4. 3.b Minimum numbers criteria

Currently, a minimum number of 10 eligible children residing in a distinct locality, as determined by Bus Éireann, are required before consideration may be given to the establishment or retention of school transport services, provided this can be done within reasonable cost limits. A “distinct locality” is a cluster of eligible children who reside in the same general area, in the same general direction, from the school attended as determined by Bus Éireann, taking cognisance of the local road network. As set out in the Indecon report the options appraised in the CBA include potential for the removal of routes with user numbers below a defined threshold. These thresholds as outlined in the options are fewer than 10, fewer than 15 and fewer than 20 pupils. The CBA demonstrates that primary pupils rely on routes with lower numbers of user’s significantly more than post-primary users. 85% of routes carrying primary school children operate with fewer than 20 children. These routes with fewer than 20 children also account for 69% of all primary aged children carried by the scheme.

The CBA demonstrates that with regard to the relatively lower demand routes with minimum numbers, they are concentrated in areas with relatively high levels of deprivation and the patterns remains similar for routes with less than 15 or 20 people, with more deprived counties tending to have a greater percentage of routes with few people on them.

The Climate Action Plan 2023 is underpinned by a Just Transition Framework, which seeks to ensure that the costs of GHG mitigation strategies, and the overall transition to a low carbon future are shared equitably across all socio-economic groups. A good school transport system is particularly beneficial to rural areas where there is a tendency to have lower numbers on routes and these areas are typically more car-dependent and have higher numbers of forced car ownership rates and thus would accrue higher costs in the transition towards sustainable modes of transport.

The provision of school transport services are also aligned with the “Our Rural Future” for enhanced regional accessibility and strengthened rural economies and communities. A number of national plans also focus on supporting the future development of rural Ireland, including a focus on reversing areas of rural decline and providing the services required to support future growth in rural Ireland. The School Transport Scheme represents an important public service supporting families in rural areas.

In Chapter 6 of Phase 2 of the review an examination was conducted on the value for money of the scheme and the value that the scheme offers to parents. In one of the examples, an analysis was conducted on the value to a parent where their eligible post primary child did not use school transport and instead an Escort to Education journey takes place every day for the full school year. Using the CSO's current average distance to their nearest post primary school of 10km, this is estimated to have cost the household on average €3,994 per annum (2019 prices). This is greater than the cost of putting the child on school transport. Another example using an average distance of 20.5km from home to school, this is estimated to cost a household on average €8,186 per annum. This example also shows greater costs to a household than the cost of putting the child on School Transport.

The largest benefit under each of the options examined in the CBA is the time savings to families due to the number of individual car journeys foregone. These time savings benefits constitute circa 70% of the total benefits under each of the options. Each option does include a positive economic benefit from reduced emissions. Maintaining these routes continues to facilitate parents' use of time elsewhere, which stimulates economic growth, including active participation in the workforce while also allowing for emissions savings. It is noted that a person creates five times more emissions travelling in a car rather than on a bus.

As part of the stakeholder engagement for this review meetings were held with the NTA to discuss these routes and the value they offer to local communities. This included discussion on the possible integrating of these routes with Local Link services. Meetings were also held with the Department of Transport and plans have commenced for a pilot/pathfinder on integration of public and school transport in rural areas.

It may also be the case that should these routes with relatively low demand be removed, a portion of users on these routes would transfer to other existing routes, albeit with a longer distance to the drop-off point than their current location.

However, it is also possible that increasing numbers of eligible users may also lead to an increase in the need for routes with relatively few users. The actual outcome will depend both on the option chosen as well as the future spatial patterns of population growth over the appraisal period.

As set out in the Indecon report, during the course of the review it was identified that there are currently 494 standalone routes with minimum numbers of pupils on these services. Further to this, Bus Éireann provided a random sample of 61 of the 494 routes (14.2%) currently operating with fewer than 10 eligible users with additional detail on the nature of these routes. The average deprivation score for these routes is -5.4. This further supports the findings of the preceding analysis with regard to the relatively lower demand routes being concentrated in areas with relatively high levels of deprivation. Therefore bearing in mind the Government's commitment to Just Transition, these routes have an important role in ensuring that the rural communities remain connected and the transition to more sustainable forms of transport is fair, equitable, and inclusive for all.

### Recommendation 4.3.b

It is recommended that routes with minimum numbers of less than 10 pupils be maintained for consultation with the Department of Transport and the NTA with a view to being regularised for potential to transfer some or part of these routes to public transport routes. It is recommended that a Working Group be established to comprise members of School Transport Section, the Department of Transport and the NTA by the end of 2023, with an agreed terms of reference to review and implement the transfer of routes with less than 10 pupils to public transport where possible and in conjunction with the roll out of the Connecting Ireland project. With effect from the start of the 2024/2025 school year, all routes with less than 10 pupils should be identified and the options for integration with public transport should be assessed and pursued by this Working Group.

In the case of a new school not served by an existing route or in the case of parental demand for a new route, it is recommended that consultation should take place with the Department's Planning and Building Unit on planning area to be served, to assist in route design and to determine whether to establish a new route. New routes will only be established where there is a minimum of 10 new applicants from a distinct locality as part of the findings in phase 2 of this review, taking 7 cars off the road and replacing them with a single mini bus, results in lower emissions and is therefore more beneficial for climate.

The published schemes should be re-written to reflect this change in time for applications for the 2024/2025 school year.

#### 4. 3.c Nearest school criteria

As outlined in the Phase 2 Report of the review, one of the recommendations of the March 2011 Value for Money Review of the School Transport Scheme was that *that the school transport catchment boundary policy should be ceased and that eligibility for post-primary transport should be on the basis of the nearest post-primary centre or school for any new pupils*

Historically, with the introduction of free post-primary education, the country was divided for planning purposes into geographic districts, each with several primary schools feeding into a post-primary centre with one or more post-primary schools. These catchment areas were determined following consultation with local educational interests. The intention was that these defined districts facilitated the orderly planning of school provision and accommodation needs. They were also the basis for the operation of the School Transport Scheme at post-primary level. There were approximately 280 catchment areas.

While the 2011 VFM report did not find any evidence that the catchment boundary system was a key factor in the rising cost of the School Transport Scheme, other than noting that transport for some pupils was not to the nearest post-primary centre, it was not clear whether this was an efficient organisation of school transport at post-primary level. In particular, given the number of complaints about the catchment boundaries from parents and schools this system was a source of considerable administrative burden to the School Transport Section as a lot of staff time was consumed in answering queries or processing complaints in relation to this issue.

In relation to the planning of school infrastructure, the general approach of the Department at that time was to plan on the basis of attendance of pupils at their nearest primary schools and that following completion of their primary level education those primary school pupils then transfer into attendance at their nearest post-primary schools or the nearest post-primary centre except in cases where parental choice was exercised in certain circumstances.

Accordingly, the report recommended *that the school transport catchment boundary policy should be ceased and that eligibility for post-primary transport should be on the basis of the nearest post-primary centre or school for any new pupils.*

As part of Phase 1 of the this review, one of the key findings of the report was that the experience of the School Transport Scheme shows that while the current criteria are based on the provision of transport to the nearest school, there is a significant cohort of pupils at post-primary level in particular whose historic pattern of attendance is to their next nearest school or post primary school centre.

Parental preference, transfer patterns from primary to post-primary, and admissions policies with regard to feeder schools, among other issues, all impact on school choice. This can mean that pupils may not always attend their nearest post-primary school. The evidence with regard to concessionary tickets indicates that in some areas pupils traditionally attend schools that are not their nearest, but that their next-nearest school is a similar distance away. Currently 53% of post-primary concessionary pupils are over 4.8 KM from their nearest school and therefore would be eligible for transport to that school if they chose to attend it.

It was not the intention of the 2012 scheme changes, as recommended in the 2011 Value for Money Review, to effect a widespread change to the schools attended by pupils from localities around the country. Such changes have potential implications for school planning and budgeting that were not anticipated in 2011.

It has been found also that while the issue of nearest and next nearest school does not cause as many issues on the primary scheme, as there generally tends to be more spare capacity on primary routes, that in some cases parents may wish to send their child to a school that is not their nearest, for example the school of attendance is the second nearest but may be the parish school.

The analysis of survey results from parents/guardians conducted as part of phase 2 of this review show that many parents are of the view that the nearest school criteria should be abolished, that families should have more choice and felt that nearest school criteria is unfair as the difference between the distances of two schools is sometimes minimal.

### Recommendation 4.3.c

As outlined in the section of this chapter on distance criteria, in order to meet the targets in relation to Escort to Education Journeys under the Climate Action Plan current distance criteria on the primary and post-primary schemes should be reduced with, the optimum distance being 1km at primary level and 2km at post primary to the school of attendance.

In conjunction with this recommended reduced distance criteria it is recommended that the nearest school criteria be eliminated. Under this recommendation existing routes to existing schools will be maintained and will cater for all applicants who meet the distance criteria. However, in the case of a new school not served by an existing route or in the case of parental demand for a new route consultation would be required with the Department's Planning and Building Unit the area to be served to assist in route design. In addition to consultation with Planning and Building Unit, the establishment of a new route will take into account the cost of establishing the route and the climate impact of establishing the new route and potential public transport options in the area before a final decision is made. This change will apply with effect from the start of the 2024/2025 school year.

The published schemes should be re-written to reflect this change in time for applications for the 2024/2025 school year.

#### 4.4 Inclusivity

As referenced in Phase 2, in planning a school placement for a child, the NCSE has regard to a number of factors including the suitability of a proposed placement and the geographical distance from a child's home. Every effort is made to minimise distance and time in getting to and from school. In many cases school transport is provided for children attending school placements outside of their own locality and issues arise as a result in regard to integration and inclusion for children with special educational needs. The Department and the National Council for Education continues to plan for additional SEN accommodation provision to meet future needs across the country. In responses to the survey just 13% of parents would prefer their child to attend a school in their local area and the remaining parents were happy for their child to continue to go to a school outside of the local area.

School Transport Section will continue to work with the Department's School Planning and Building Unit and the National Council for Special Education (NCSE) to work towards a more inclusive and integrated approach. As provision of SEN places increases at a local level, school transport requirements will reduce but this will happen over time. It is noted that there has been some progress made on this in recent times.

In the interim, where possible, it is considered that measures should be put in place to allow a child with SEN travel on a mainstream service where there is such a service available and where the parent wants their child to travel on the mainstream service.

In response to the survey just over 25% of parents of SEN pupils said that their child would use mainstream services if an escort were provided and 11% said that taking into account their child/rens needs that they would like the option for their child to travel on a mainstream service rather than a SEN service. These percentages were used as a basis for establishing projections of the numbers of SEN pupils that would be open to integrating onto mainstream transport, using a lower conservative figure of 5% and a higher figure 20% as the potential number of SEN pupils that would be open to transfer and to take into account the number of mainstream services would be able to facilitate their

needs on current services. Integration onto mainstream services also supports the development of the child in terms of long term life skills, social development and physical health.

As supported by the findings in the CBA, option 4 and option 1 sets out a target of 20% of SEN pupils integrating on the mainstream transport. The findings indicate that while Option 4 has the lowest level of financial losses, more significant net economic benefits in absolute terms from the scheme are more likely to come under Option 1. Therefore a target of 20% integration is the optimal target. It is important to recognise that currently circa 45% of SEN pupils travelling on SEN transport attend special schools and may not be in a position to move to mainstream transport. The remaining 55% of pupils travelling on SEN travel attend special classes/mainstream schools and these are the cohort of pupils who should initially be considered for integration on mainstream services as more special class placements become available locally.

#### Recommendation 4.4

As referenced in Recommendation 4.1.b, it is recommended that a working group be established to comprise members of School Transport Section and Special Education Section of the Department, the National Council for Special Education and Bus Éireann to facilitate and enable ongoing improvements to the scheme. It is recommended that this group be established by the end of 2023 and that terms of reference for the group are agreed within that timeframe also.

It is recommended that in the short term (for the 2024/2025 school year) that this group should examine changes to the application form for families to here can indicate that they wish for their child to travel on mainstream services where such transport is in operation and to identify if the child could only do this with the support of a School Bus Escort. This process should be in place for transport applications for the 2024/2025 school year.

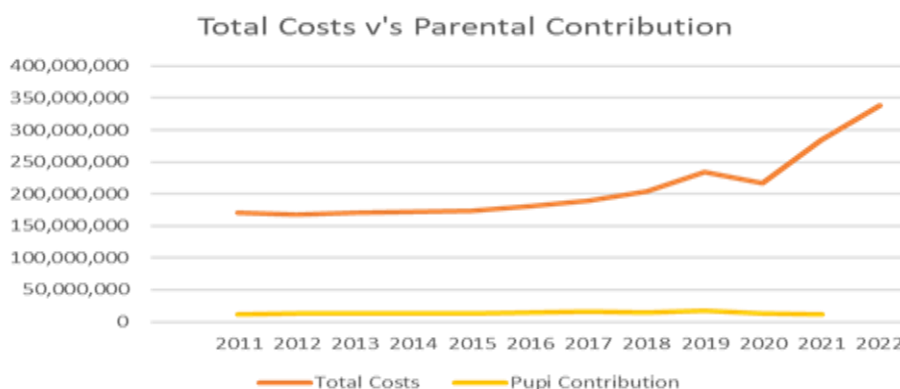
In the medium to longer term, and as a future phase of work, School Transport Section should continue to work with the Department's School Planning and Building Unit and the National Council for Special Education (NCSE) to work towards a more inclusive and integrated approach. This inclusive approach should be rolled out at a point in time as agreed for new pupils, as and when they come to use the services of the School Transport Scheme. In the longer-term, it is considered that integration will only be fully realised as more special needs provision in terms of school places are made available locally.

#### 4.5. Pricing

This falls into two categories - Mainstream and SEN. Each will be looked at separately.

In the analysis of pricing, it is noted that the School Transport Scheme is heavily subsidised by the State. As set out in greater detail below, prior to the current school year, the charge per primary pupil was €100 and the charge per post-primary pupil was €350, while the annual estimated cost to provide transport for a pupil on the primary and post-primary schemes in 2019 was €1,100 per annum. The average estimated cost to provide transport for a pupil on the special educational needs (SEN) scheme in 2019 was circa €9,000 per annum with no charge to families using this scheme. Parental contribution shows no correlation with the costs of the scheme. Parental Contribution as a % of total costs in 2011 represented 6.7% of total costs and at its highest was 8.1% in 2016.

Parental contribution as an element of the overall costs of the scheme are set out in the table below.



#### 4.5.a. Mainstream

##### Primary and Post-Primary Schemes

Until February 2022, ticket charges had remained unchanged since the 2012 budget, following the 2011 VFM report.

In February 2022, Government announced as part of a package of cost of living measures that for the 2022/2023 school year the annual school transport cap per family would be reduced from the then cap of €220 to €150 per family at primary level and from the then cap of €650 to €500 per family at post-primary level. There was to be no change to the individual ticket price per pupil. Eligible children holding valid medical cards and eligible children with special educational needs remained exempt from paying the annual charge.

In July 2022, in light of the increasing cost of living and with a view to easing the financial burden on families, the Government approved measures to introduce a fee waiver to families for School



Transport Services for the 2022/2023 school year as a temporary measure. It is considered that this resulted in a significant increase in the number of applications for school transport for the 2022/2023 school year. At the start of the 2021/22 school year there were circa 103,600 children on primary and post-primary mainstream School Transport Scheme services. In the school year 2022/2023, over 149,000 children, including over 18,000 children with special educational needs, were transported on a daily basis to primary and post-primary schools throughout the country. There has been an increase of 21% in tickets issued to mainstream eligible students and 38% increase in tickets issued to mainstream concessionary students in the 2022/23 school year compared to the 2021/22 school year.

For the 2023/2024 school year an annual ticket charge has been re-introduced. Bearing in mind the continued high cost of living, Government approved measures to re-introduce a charge but at a significantly lower level than the previous annual charge. For the 2023/2024 school year the charge is €50 per primary pupil, €75 per post-primary pupil with a family cap of €125. This is a significant decrease in the previous fee of €100 per primary child and €350 per post-primary child with a previous family cap of €650. Eligible children holding valid medical cards and eligible children with special educational needs are to remain exempt from paying the annual charge.

#### *School Transport Annual Charges*

Category of Pupil	Annual Charge for the 2021/22 School Year	<u>Revised Annual Charge for 2022/23 School Year – Change in Family Cap – Feb 2022</u>	<u>Revised Annual Charge for 2022/23 School Year – Free Transport – Jul 2022</u>	Revised annual charge for the 2023/24 school year
<b>Primary</b>				
Eligible/ Concessionary Pupil	€100	€100	€0	€50
Maximum Family Contribution at Primary	€220	<b>€150</b>	<b>€0</b>	<b>€125</b>
<b>Post-Primary</b>				
Eligible Pupil/Concessionary Pupil	€350	€350	€0	€75

Maximum Family Contribution at Post-Primary	€650	€500	€0	€125
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In analysing pricing of tickets on the School Transport Scheme, consideration was given to research in the area of ticket charges on public transport. The recent NTA review “Fare-Free Travel Policy Analysis” summaries that economic literature suggests that transport subsidies are widely considered to be beneficial given the substantial societal costs of car use. However, these studies do not generally endorse free fares, as it would be overly costly and incentivise excessive travel. It has also been demonstrated that when Fare Free Transport is introduced, a larger share of new passengers often come from active modes such as walking or cycling rather than private cars. The share that does come from car drivers correlates less strongly with fare reductions than with increases in fuel prices, restrictions on parking and road usage, or increases in public transport quality in terms of speed, frequency, and coverage. Irish transport users have highlighted other issues around public transport availability and reliability as greater barriers to reducing car use than public transport pricing.

This can also be said for the School Transport Scheme as experienced when parental fees were removed. While additional demand was created it is not possible to quantify how many applicants who applied for tickets actually used them. It is noted that at the beginning of the 2022/2023 school year work commenced on an eTicketing project, the results of which will inform a tender competition for roll-out nationally. During the 8 week project period data was captured of usage patterns of individual passengers. The initial results showed that of the 300 pupils on some 11 routes, average utilisation of up to 75% was observed on some routes, while on others routes numbers averaged closer to the 40% range.

Other research indicates that a monetary charge will lessen the impact on numbers applying for a service that they do not really require or may not actually use. Abrantes, P,R Fuller and J Bray (2013) “The Case for Urban Bus – The Economic and Social Value of Bus Networks in rhw Metropolitan Areas. Report for PTEG” – summaries the research undertaken in the UK which has shown that, on average, regular bus users would be willing to pay up to £60 (€70) per year, and infrequent users £38 (€45) per year, in order to ensure that a bus service is retained.

It is also worth noting that feedback received at the time of the roll out of free school transport was that parents were more than happy to pay a fee for transport as many view the School Transport Scheme as an essential service and are more than willing to pay for the services provided.

#### Recommendation 4.5.a

A fee should be charged to those families applying to use School Transport Scheme services to ensure that those for whom the scheme is vital, in order to allow children to attend school. This is in line with research analysis, which suggests that a fee ensures more effective and efficient use of Exchequer funds than that of free transport has to offer.

It is recommended that as per Option 1 in the CBA, that the charge should be that as per the 2023/2024 school year, i.e. €50 per primary pupil, €75 per post-primary pupil, with an overall family cap of €125. This fee should be reviewed when more detailed information on ticket usage is available, when the eTicketing project is rolled out nationally (details of the eTicketing Project are outlined in greater detail in Chapter 5, Section 5.4).

It is recommended that there continue to be no charge for children who hold a full medical card as this is considered to add disadvantage to families who are already at disadvantage. However, it is recommended that this should be reviewed when the eTicketing project is rolled out nationally and when more detailed information on ticket usage is available, which should be available in 2025.

#### 4.5.b. Special Educational Needs Scheme

Eligible children with special educational needs are exempt from paying an annual charge. As outlined in Phase 1 of this review, between 2011 and 2019, costs associated with the SEN element of the scheme have increased significantly, rising by €61.3m from €60.2m in 2011 to €121.5m in 2019. Over the 8 year period this is an increase of 100% which is above the CPI inflation rate of 3.6% for the same period. There is no pupil contribution to be factored into these costs as eligible SEN pupils are exempt from charges.

The total SEN services cost to the exchequer has increased from €7,274.26 per pupil in 2011 to €8,543.52 per pupil in 2019, this increase during the 8 year period is above the CPI inflation rate of 3.6%. It is worth noting that the cost per pupil on the SEN scheme is higher than that per pupil on the mainstream scheme due to the fact that services are more specialised, can be individual in nature, tend to be longer in terms of distance travelled and may require escort support.

There was a recommendation included in the 2011 Value for Money Review of the School Transport Scheme that for children availing of SEN transport scheme services that a charge should be put in place where families are not holders of medical cards and that this charge would be €200 per primary or €300 per post-primary special needs child, to be paid in two instalments in the same way as the primary or post-primary charge. This recommendation was never implemented.

It is considered that a fee should not be charged for children travelling on the SEN transport scheme for the following reasons:

- For some children, they are not attending their local school and they have to travel longer distances to the nearest school that is resourced to meet their needs. This is not by choice and in many cases, and as backed up by the parental surveys conducted in Phase 2, many families have other children travelling to different schools. A charge for school transport would be an additional burden.

- For many families with a child with special educational needs, there may be additional costs in providing for the care needs of their child, so a charge for school transport would be an additional burden.

#### Recommendation 4.5.b

It is recommended that it remains that there be no charge for children travelling on the SEN Transport Scheme. However, it is recommended that this be reviewed when eTicketing is rolled out nationally and when more detailed information on ticket usage is available, which should be available in 2025. This should form part of the work to be conducted by the Working Group to be established to consider ongoing improvements and efficiencies to the SEN scheme.

#### 4.6 Other issues relevant to eligibility criteria.

##### Exceptional Circumstances

It is understood that while the School Transport Scheme should operate within the parameters of the eligibility criteria there are certain exceptional cases where children may require transport and where their individual situation/personal situations leave them outside of the eligibility criteria.

As part of the stakeholder engagement process views were expressed was that greater flexibility is necessary within the School Transport Scheme, particularly in cases concerning children who encounter challenging domestic or housing circumstances. It was also expressed that the application of flexibility and compassionate grounds, should form part of the review.

For example, in cases where a family moves home or is in a series of temporary accommodation/state provided homelessness shelters etc., their accommodation arrangements can be unstable and change frequently. The movement in accommodation can result in school disruption and loss of stability where a child moves school frequently. In a lot of cases parents and children would prefer to maintain the stability of staying in the same school. In Dublin, children availing of state provided homeless accommodation are provided with LEAP cards and can continue to avail of transport and continue to attend their school at no cost. However, where homelessness arises outside of main urban areas, access to school transport can be an issue.

In such exceptional cases *i.e.* where a child is homeless or otherwise encounters change of accommodation on a transient basis (e.g. the parent moves to a temporary refuge due to domestic violence) consideration should be given to access to school transport / transport grant to enable continuation of education and stability for the pupil.

By their very nature it is not possible to provide an exhaustive list of circumstances which are considered to be exceptional. However, where circumstance arises where the lack of availability of transport is considered a barrier to a child's attendance at school such cases should be considered on a case by case basis based on the individual merits of the circumstances.

It is noted that there is an agreed process in place between School Transport Section and Tusla Education Support Service in regard to such exceptional circumstances. Under this agreed process where Tusla Education Welfare Officers (EWOs) Tusla are made aware of pupils who are not attending school due to their home situations or where the lack of transport is a barrier for children to attend school, they investigate these cases and liaise with the school. In situations where school transport is deemed as a requirement, Tusla Education Support Service contact School Transport Section and request assistance. In areas where school transport is in operation and capacity exists, spare seats are offered to families. Transport of an individual nature is not arranged as many of these arrangements are for a short term basis. These cases are dealt with individually and as they arise.

#### Recommendation 4.6

It is recommended that this agreed process be continued in order to assist with such exceptional circumstances to minimise the risk of non-attendance at school.

It is also recommended that other transport options be examined with the Department of Transport/NTA, where there are transport solutions available such as Local Link Services in rural locations. Furthermore, funding as a temporary measure could be made directly to schools to arrange transport on a short term exceptional basis. The costs associated with this recommendation is minimum. It is estimated that no more than 10 families meet such exceptional circumstances in any year as most pupils meeting these requirements can be accommodated on existing transport services. It is anticipated that in 50% of the cases these are short term requirements with the remaining families requiring assistance for one school year. The maximum estimated cost associated with this recommendation is €60k per annum.

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## Chapter 5 – Scheme operational Issues

In this chapter a number of scheme operational issues are examined, to include:

- Rate of grant payment for the Remote Area Grant and the Special Transport Grant
- Application process and timelines for the Mainstream and SEN Schemes
- Methodology to measure distance to determine eligibility and the shortest traversable route
- Technological and ICT improvements
- School Bus Escorts

### 5.1. Rate of Grants

School Transport Section provides grants to families in certain circumstances to support them with the cost of providing their own transport arrangements – the Remote Area Grant and the Special Transport Grant. The rates of these grants are effective since the beginning of the 2011/12 school year.

#### 5.1.a Remote Area Grant – current status

Parents of a child wishing to avail of school transport services, for the first time, are required to submit a completed application form for School Transport to their local Bus Éireann office. Where there is no transport service available for eligible children, Bus Éireann will forward the applicants details to the Department, who will contact families directly regarding the Remote Area Grant. It is important to note that an application for school transport must be made before a Remote Area Grant may be considered.

An eligible child for whom no transport service is available may, following an application for transport within the prescribed time limits, receive a Remote Area Grant towards the cost of private transport arrangements.

An application for transport must be submitted for each subsequent child requiring transport, even in cases where the family is already in receipt of the Remote Area Grant.

Currently, the grant, which is payable annually at the end of the school year, is generally based on the distance a family resides from their school of eligibility.

The Remote Area Grant is also payable for eligible primary or post primary children who have to travel 3.2 kms or more to or from a Bus Éireann designated pick up/set down point.

Where the pick-up point is more than half the distance from home to school:

- the grant will be calculated on the distance from home to school in cases where the family do not avail of the transport service

- the grant will be calculated on the distance from home to pick-up point in cases where the family avail of a transport service.

- **Current Rates of payment for Remote Area Grant**

Distance	Daily Rate
3.2 – 4.7 km	€1.30
4.8 – 6.4 km	€2.60
6.5 – 8.0 km	€3.30
8.1 – 9.6 km	€4.20
9.7 +	€5.10

- **General information**

The maximum daily allowance payable under the Remote Area Grant is €5.10 per day – regardless of the number of children from the same family, travelling to particular schools. For families with more than one eligible child the grant amount will be calculated by reference to the child with the highest attendance record. Grants will only be considered for the school year in which an application for transport is received; grants will not be paid retrospectively. Grants are subject to periodic review and may be varied or withdrawn where circumstances change e.g. where school transport becomes available.

The number of families claiming the Remote area grant year on year since 2019 has fallen. The average annual grant per family increased in 2022 by 32% to €577.32 per family. The maximum amount of grant available to a family is €933.30 a year. This compares to the figure of €1,006 for the average costs of a mainstream pupil on transport in 2022. Both figures exclude administration costs.

### **Remote Area Grant Payment to Families**

<b>Year</b>	<b>No. of Families</b>	<b>Amount</b>	<b>Average grant per family</b>
21-22	1446	€ 834,807.70	€ 577.32
20-21	1468	€ 639,603.70	€ 435.70
19-20	1589	€ 724,623.70	€ 456.02
18-19	1623	€ 1,021,787.30	€ 629.57
17-18	1594	€ 963,039.25	€ 604.17

In order to assess whether a grant rate change is necessary consideration was given to the last amendment to the Remote Area Grant rates which were made in 2012. According to AA Ireland's annual motoring costs survey, in 2012 it was estimated to cost €11,934.40 to run a typical model in the common Band C motor tax category doing an average of 16,000km per year.

The average cost of running a family car for a year in 2019 was €10,691 according to the AA's annual survey of motoring costs. There is no average cost available for 2020 to 2022 onwards but costs are not reported to have increased greatly. Therefore on the basis of the cost associated with running a car not having increased it is not considered appropriate to increase the rate of the remote area grant. This is further supported by the fact that fuel prices have remained relatively the same since 2012. According to AA in 2012 the average fuel prices in Ireland were - €1.60 per ltr for diesel and €1.65 for unleaded petrol. In April 2023 the average fuel prices were - €1.58 per ltr diesel and €1.62 for unleaded petrol.

The Climate Action plan includes measures to reduce car journeys, through improved public and active transport networks. The transport sector is Ireland's second largest emitter of GHGs (after agriculture), and private passenger cars are the single largest emissions component within the sector. The Government acknowledges the concept of 'transport poverty' and the importance of a just transition approach to achieving our climate targets for transport. However, increasing remote area grant rates would counteract climate action by continuing to support Escort to Education Journeys.

The vast majority of families in receipt of the remote area grant live in areas of dispersed and low-density development. These areas, as noted throughout this report, are areas where there are high levels of transport poverty. This is a particular, although not unique, challenge to rural communities. Communities living in certain areas can be 'locked-in' to car ownership. Several actions aim to address transport poverty including the expansion of the National Transport Authority's (NTA) Connecting Ireland Rural Mobility Programme. As part of the discussions with the NTA as part of this review it was agreed to meet to discuss the possibility of the Connecting Ireland Rural Mobility Programme being expanded to include these pupils on their services where possible.

Under the options set out in the CBA, Indecon have identified that the biggest economic benefit of the School Transport Scheme is time saving associated with parents' time transporting the child to school. Therefore, to support better economic outcomes and in order not to create a financial barrier to changing to public transport it would further support the recommendation that the rate of grant should not be increased.

### Recommendation 5.1.a

It is recommended that, based on the information above including that the average cost of running a family car having not increased since the last amendments to the rates of grant were made, and in support of the Climate Action plan targets to encourage greater use of public transport, that no



changes should be made to the remote area grant rates. This supports the findings of the CBA analysis which outlines that a greater economic benefit is to be had through greater use of public transport.

This should be considered by the Working Group that is to be established to review and pursue the potential for school and public transport integration.

### 5.1.b Special Transport Grant

Where children are eligible for school transport a Special Transport Grant towards the cost of private transport arrangements may be provided to families, at the discretion of the Department, in situations where:

- Bus Éireann is not in a position to provide a transport service;
- a child's age, behavioural difficulties or medical needs are such as to make the provision of a transport service impracticable;
- an escort is considered necessary, and the provision of such support is not feasible;
- the cost of establishing/maintaining a service is considered prohibitive.

Grants are only considered for the school year in which an application for transport is received; grants are not paid retrospectively.

#### Current Rate of Grant

The grant payable is based on the distance that a family reside from their child's school of attendance. The calculation is based on four trips per day (home to school and school to home, morning and afternoon) multiplied by the number of days a child attends school in the relevant school year.

The costs of Special transport grants have remained relatively stable since 2011, with the cost peaking at €3m in 2011 and cost for 2022 at just under €3m. The average cost of a grant to a family was €2,500 in 2022 this compares favourably to the cost of providing SEN transport which was €10,355 per pupil in 2022.

In the CBA analysis it is identified that SEN transport is not economical to run under any of the options and therefore the Special Transport grant does provide value to the scheme both in economic and financial terms. In order to maintain these saving on these journeys and in the interest of the pupils in these cases it would be important to maintain these routes in the short term.

However, in the longer-term consideration of other factors that school transport services provide, such as enabling independent life skills, etc. it would be important to review the integration of children on a transport service where possible. As referenced in Section 4.1.b of this report, the potential to provide for inclusivity on mainstream services will be supported by the provision of more special class places

locally. This will ultimately reduce the journey time and distance for children on school transport services, respond to individual circumstances and will allow for further potential to integrate SEN and mainstream services where possible and appropriate taking into account the care needs of the children involved.

The current rate of grant is 39.12 cent per kilometre for the first 6,437 kilometres travelled and 21.22 per kilometre for each kilometre travelled thereafter. This rate is based on the Civil Service Motor Travel Rates effective from 5<sup>th</sup> March 2009. These Motor Travel Rates were revised in 2017 and in 2022 and are summarised in the table below:

2009 Civil Service Rate		2017 Civil Service Rate		2022 Civil Service Rate	
Distance band	Rate per km	Distance band	Rate per km	Distance band	Rate per km
<6,437km	39.12 cent	<1,500km	37.985 cent	<1,500km	41.80 cent
		1,501-5,500	70.00 cent	1,501-5,500	72.64 cent
>6,438km	21.22 cent	>5,501km	27.55cent	>5,501km	31.78 cent
		> 25,001	21.36 cent	> 25,001	20.56 cent

It is considered that the rate for the Special Transport Grant should be increased in line with the 2022 Civil Service Motor Travel rates, an increase of 2.68 cent on the lower distance band and increase of 10.56 cent on the higher distance band. The average number of days for attendance in 2022 for a pupil in receipt of the STG was 130 days. If the increased rates were introduced, the estimated additional cost per annum would be 14% or €420,000 on the cost of the grants for the year.

#### Recommendation 5.1.b

It is recommended that with effect from the start of the 2024/2025 school year that the rate of the Special Transport Grant be increased in line with the 2022 Civil Service Motor Travel Rates and in using that rate as a basis, the rate should be increased to 41.80 cent for the 6,437 kilometres travelled and 31.78 cent per kilometre for each kilometre travelled thereafter.

## 5.2 Application process and Application and payment timelines

### 5.2.a Primary and Post-Primary Schemes application process and timeline

#### **Application process**

Currently, parents/guardians apply via an online application portal on Bus Éireann's website, Recommendations with regard to technological improvements to the current on-line application process are covered in section 5.4 of this chapter.

#### **Application timelines**

Currently the closing date for new applicants for the upcoming school year is the last Friday in April. All new applicants and roll-over ticket holders from previous years are required to pay or enter medical card details by the last Friday in July. Generally, the family portal opens in February of any given year and new applicants may apply from this date. However, it is not currently possible to pay/enter medical card details at that stage and the facility to pay/enter medical card details becomes available generally in early to mid-June.

Currently, following the closing date for payment/entering medical card details on the last Friday of July, final planning and scheduling of routes is conducted by Bus Éireann, tickets are allocated and those families who have not been successful in getting a ticket are informed.

It is considered that the two-part application and payment process should be condensed to one step, with the option to pay/enter medical card details at the time of application. For roll-over ticket holders the ability to pay/enter medical card details should be available from the time the portal opens for new applicants. It is considered that the closing date for applying and for paying should be brought forward to earlier dates to allow Bus Éireann adequate time to plan and procure required services, to issue tickets/communicate with families well in advance of the new school year. It is considered that the online application system, the Bus Éireann Family Portal, should close for a period following the date for payment/entering medical card details, for the following reasons:

- This allows clear differentiation in relation to late payments received after the closing date and will encourage greater on time payments if customers know the portal will close for period after the closing date.
- This will place a temporary hold on further applications and payments arriving after the closing dates and will allow local offices prepare for ticket distribution as early as possible. Early ticket distribution is critical to try and alleviate large volumes of queries from customers later in the summer period.
- It will allow time to analyse all applications, including rollover applications for mainstream and it will allow time to complete the agreed selection process for the allocation of tickets.

It is noted that in recent years the portal has closed on a number of occasions after the closing date for payment/entering medical card details but this been on an ad hoc basis and generally in reaction to prevailing circumstances, for example the significant increase in applications following the Government Decision that there would be no ticket charge for the 2022/2023 school year.

### Recommendation 5.2.a

It is recommended that the family portal should open by the beginning of February for new applications for primary and post-primary transport for the school year commencing the following September. It is recommended that the closing date for new applicants be the last Friday in April.

It is recommended that the facility to pay/enter medical card details be open from when the family portal opens at the beginning of February and that the closing date for new applicants and roll-over applicants to pay should be the Friday after the June bank holiday weekend. This is in order to allow Bus Éireann adequate time to plan and to ensure timely issuing of tickets and communications with families. It is recommended that the family portal should close for a three-week period following the closing date for payment/entering medical card details for the reasons as outlined above.

It is recommended that these application/payment dates be put in place for applications for the 2024/2025 school year, pending confirmation that the technological changes required can be made in order to allow this to be achieved.

## 5.2.b Special Educational Needs (SEN) Scheme

### **Application timelines**

While parents/guardians are encouraged to submit applications by the last Friday in April in any given year for transport for the following September, applications for the SEN scheme are accepted on a year-round basis. By accepting applications year-round, the Department can ensure that children with special educational needs receive the transport they require.

To ensure the efficient delivery of services for children on Special Educational Needs school transport, Bus Éireann assesses each application to assess the options available. Where children can be facilitated on an existing service, applications are processed immediately, and arrangements put in place with families involved. Where a new service is required, this may mean a procurement / vetting process while in many instances the school is also sanctioned to employ a transport escort, and this necessarily takes time to put in place.

### Recommendation No 5.2.b (i):

It is recommended that parents/guardians are continued to be encouraged to submit applications by the last Friday in April in any given year for transport for the following September. It is further recommended that applications for the SEN scheme continue to be accepted on a year-round basis so as to ensure that children with special educational needs receive the transport they require.

#### **Application process**

The application process for children availing of transport on the Special Educational Needs transport scheme is currently a paper-based process. There are 4 steps to completing the application – the parent completes a section and submits it to the school principal, the school principal completes a section and submits it to the SENO, the SENO completes a section and submits it to School Transport Section who consider the information in the form and make a decision on eligibility for transport. The process is therefore complex, time consuming and involves a number of stakeholders.

It is considered that the process should allow for a parent/guardian to complete an online application form that allows the request to move to relevant bodies for approval (schools, NSCE, Department of Education) and subsequently finish with Bus Éireann as a request for transport. At all stages it should be possible to move forward and back to the various parties if additional information is required etc.

This will eliminate the inputting of each application and reduce the time currently required by School Transport Scheme in dealing with applications and will therefore improve the efficiency of the application process.

It is noted that work has commenced and discussions are underway between the Department, Bus Éireann and the NCSE about the creation of an online application facility for SEN transport.

### Recommendation 5.2.b (ii)

It is recommended that the initial work that has commenced with School Transport Section, the NCSE and Bus Éireann in regard to creating an online application form should be progressed with a view to having an online application facility available for the 2024/2025 school year.

It is recommended that the application form be updated and amended to simplify the language and to capture additional information relevant to the application (to include information such as what is the nearest school in cases where the application for transport is not to the nearest school, any additional information specific to the child for whom the application is being made, the ability to indicate where the application relates to a change of address and a question for the parent/guardian as to whether or not they would accept a grant where there is no service currently available). The application form should be updated for applications for the 2024/2025 school year.

As referenced in Chapter 4, it is further recommended that a Working Group be established to comprise members of School Transport Section and Special Education Section of the Department, the

National Council for Special Education and Bus Éireann to facilitate and enable ongoing improvements to the SEN scheme and process, including the application process.

### 5.3. Methodology to measure distance to determine eligibility and the shortest traversable route

Currently, distance eligibility is determined by measuring the shortest traversable route from a child's home to the relevant school. A computerised system primarily measures the route distance and does not take into account any one mode of transport.

In cases where distance eligibility is marginal or in dispute, vehicles fitted with calibrated measuring devices which measure the distance down to the nearest metre may be used to establish the exact distance and/or the nearest appropriate school to the child's home.

The shortest traversable route between a child's home and the relevant school may be either a pedestrian or vehicular route, and it is not necessarily the route that the school bus takes. The route travelled by a school transport service is currently not a consideration in determining eligibility for school transport. Bus Éireann takes this approach because otherwise distances could vary on the route to and from the school.

In addition to issues being raised in regard to the shortest traversable route and how it is measured, one of the views expressed in the stakeholder engagement process was that there is a lack of transparency about how the 'nearest school' distance is calculated. This issue consistently persists, year on year, from parents reporting the distance outlined by School Transport to their nearest school, differentiates to that determined on web-based mapping platforms.

In certain cases, the shortest traversable route may include routes such as one-way streets that cannot be travelled on in the opposite direction, footpaths, parts of motorways, etc. and in many such cases it is not possible to drive the route in full or to walk the route in full.

#### Recommendation 5.3

It is recommended that the methodology for measuring distance to determine eligibility be updated in line with contemporary methodology to measure routes traversable by a vehicle by road, using modern mapping technology or GIS technology.

School Transport Section and Bus Éireann should commence this work during 2023 and amended methodology for measuring distance for eligibility purposes should be in place for the 2025/2026 school year at the latest.

## 5.4. Technological/ICT improvements

One of the findings from the stakeholder engagement process was parents would like to see improved use of technology where possible. It was also raised in the stakeholder engagement process that improved use of technology could result in more efficient services both from the point of view of families using the service and in the operation of the scheme.

It is noted that there are a number of ICT developments underway both within School Transport Section and within Bus Éireann as the operator of the scheme on behalf of the Department.

### 5.4.a Technological/ICT improvements in School Transport Section

Within School Transport Section, there are a number of forms which are currently in use in which require updating to a more secure online process which, when complete will improve efficiencies and effectiveness within the section and the security of the data concerned.

- Remote Area Grant payments – this generates approximately 2,700 statement of attendance forms annually which are submitted to School Transport Section via excel spreadsheets from schools.
- Special Transport grant payments generates approximately 1,170 statement of attendance forms annually which are submitted to School Transport Section via post or email from parents. Payments may be made for three separate periods annually and this generates circa 3,500 statement of attendance forms.
- Payee details forms – from the generation of the above remote area grant and special transport grant attendance forms, an additional 1,000 payee details form are submitted annually to School Transport Section via post or email.
- School Bus Escorts – Over 970 escort reconciliation forms are submitted to School Transport Section via email from schools outlining the names of escorts and hours worked for each.

School Transport Section in conjunction with other areas in the Department is working towards secure online solutions to replace these forms, many of which are currently received via post.

#### Recommendation 5.4.a

It is recommended that the work underway within School Transport Section should be completed to ensure that online secure processes are in place for the 2024/2025 school year.

### 5.4.b Technological/ICT improvements in Bus Éireann

In addition to the work being carried out within School Transport Section of the Department, Bus Éireann is also working with the Department to assess technology that would enhance the efficiency of the scheme and enhance the customer experience for families who use it.

It is noted that in late 2022 a Smart Ticket trial operated across 11 services travelling to Kells, Co. Meath. This enabled a real-life demonstration of the capability of electronic school bus ticket technology. With over 300 pupil passengers taking part, this trial did successfully demonstrate the capability of the smart ticket technology to capture information on Bus Seat utilisation, confirmation of services operated and the digital capture of the route travelled using GPS data, capturing useful journey distance and time information. On all services data was captured and usage patterns of individual passengers could be determined over the 8-week period of the trial. The Proof-of-Concept trial gave evidence to patterns of usage including non-usage of services over the period. With that data, this provides the potential for policies to be developed on issues such as bus seat re-allocation. For example, if a specific passenger were not to use the service for a continuous period, their ticket could be withdrawn (after a due warnings issued) and re-allocated to another child who was unable to secure access to a bus seat for capacity or other reasons. The trial gave evidence of the training, process management & control required for the implementation of a new ticketing solution and the impact on operators, drivers and passengers. A positive response to the trial was confirmed with the parents surveyed and their feedback will be a valued input in considering the scale of a national rollout. The trial revealed the everyday issues associated with school transport, such as children forgetting or losing their fobs, battery degradation with devices and drivers forgetting to switch on ticketing machines before setting off on journeys. All these learnings will be valuable inputs into this project's next stage.

It is intended that a tender competition for national roll-out of eTicketing on all School Transport Scheme services will follow. Not only will eTickets replace the current printed paper tickets (each child will have a fob) but the device on the bus will record route details, start/end time, pick-up points etc. and will over time allow for all school transport routes to be digitally mapped and will provide accurate information on ticket utilisation. The information will be compatible with the GIS system used by the Department. Some of the benefits of this project are:

- Identify utilisation patterns for allocated seats. Situations arise where students are awarded a place on school transport, and for various reasons, do not use it often. As there is no objective tracking of usage, these seats cannot be reallocated currently, which is inefficient considering the existing demand for places. The ability to track usage would enable the Department of Education to develop an appropriate policy around more proactive yield management and seat utilisation.
- Reduce the administrative burden and cost of issuing paper tickets each year
- Enable more rapid and efficient processing of payments to contractors as each service that operated will be easily confirmed and verified.
- Facilitate better integration and management of capacity (optimisation) across routes allowing better planning and vehicle sizing including the integration of SEN services.



There are further opportunities to improve the school transport service through technology, and simplification of processes, such as the potential to:

- Inform parents/guardians by text message in the event of bad weather meaning the service is not running, or if there are delays.
- Streamline the application and payment process, reducing the number of interactions required for parents/guardians and allocating places earlier in the summer to facilitate improved planning, and reduce the need to process refunds to people who do not secure a place.
- Make information about routes, stops and timetables publicly available and easier to access which would enhance overall customer experience.
- Mobile and tablet enabled technology to be made available.

In addition, discussions are ongoing between the Department and Bus Éireann regarding other areas where there are opportunities to improve services and gain efficiencies through technology such as in the areas of electronic procurement and BI (Business Intelligence) reporting.

#### Recommendation 5.4.b

The Department and Bus Éireann should continue to explore and implement improved technology to increase accountability, information to improve planning and resource allocation and simpler, more customer friendly and transparent interfaces. It is noted that any investment in such technology will be subject to the availability of funding and must be in line with public procurement obligations. It is important that any technology invested in is transferable should there be any changes to the future operation of the School Transport Scheme.

It is recommended that a Working Group be established during 2023 to comprise members of School Transport Section and Bus Éireann to continue to explore potential improvements. This should commence with a review and analysis of the eTicketing project and the potential for changes to the ticket allocation model once more data becomes available. Other agencies as required (for example the National Transport Authority) should be consulted as required by this Working Group.

## 5.5 School Bus Escorts

### School Bus Escorts

There is a facility within the Special Needs Transport Scheme for the appointment of a School Bus Escort where a child's care and safety needs while on school transport are such to require the support of an escort.

The employment of a School Bus Escort, where required, is sanctioned by the Department of Education and the Escort is employed by the school management authority. Once a sanction for employment has been approved, School Transport Section issues funding to the school management authority at the end of each school year by way of advance payment for the next school year.

As part of the stakeholder engagement process conducted for the review, issues around recruitment and retention of School Bus Escorts were raised by schools as being challenging.

It is noted that work is underway by School Transport Section in preparing an information pack for School Management Authorities regarding the employment of School Bus Escorts. It is noted that this information pack is not expected to replace current employer/employee practices and that as the School Management Authority is the employer of the School Bus Escort it is their responsibility to keep up to date with and comply with policies and legislation relating to terms and conditions of employment, redundancy and retirement. This pack will include information for School Management Authorities on the sanction process for the employment of an escort, pay (including sick pay) and will include general information on where to find links to legislation.

It is intended that the information pack will:

- Provide clarity to school management authorities in relation to the sanction/funding process for school bus escorts.
- Point school management authorities in the direction of legislation/information in relation to employer/employee relations.
- Provide information on sick leave arrangements.
- Provide information on where training may be provided for school bus escorts.

### Recommendation 5.5

It is recommended that the work underway by School Transport Section be completed in order to issue an information pack to schools by the start of the 2024/2025 school year.

It is recommended that School Transport Section also review pay rates and other employment matters for School Bus Escorts and that these matters should be reviewed in full by the end of 2024.

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## Chapter 6 – Scheme Integration

### 6.1 Active Travel Integration

Active travel to school has been endorsed by leading public health organisations including the World Health Organisation, as a highly effective way to increase children and young people’s physical activity. As mentioned previously 81% of primary and 88% of post-primary children do not meet the national physical activity guidelines and 1 in 5 primary school children in Ireland identified as overweight or obese. The World Health Organisation recommends a minimum of 60 minutes of moderate to vigorous physical activity a day for children aged 5 to 17. Walking and cycling to school provides a convenient opportunity to incorporate physical activity into the daily routine of children and adolescents.

The Government introduced an initiative, Safe Routes to School, in March 2021 to support walking and cycling infrastructure in an effort to tackle traffic congestion at schools, create safer paths and bike lanes, and encourage more children to walk and cycle to school. They have also prepared a Safe Routes to School Design Guide the aim of which is to have successfully enhanced sustainable access to schools.

The School Transport Scheme also has the potential to make a considerable difference to front of school environments in terms of safety. Safety around the school gates and on the journey to school is a real barrier when it comes to promoting active travel. The front of school gate should be an area which is free from cars, free from congestion and child focused. Providing greater access and capacity on the School Transport Scheme by reducing Escort to Education Journeys can contribute greatly to this safer school environment. To ensure that more children and adolescents actively travel to school, feedback from both the stakeholder engagement and research in the area has been taken on board to ensure that the optimal distance between home and school is set so that walking seems like an attractive and feasible choice for pupils.

As previously mentioned in greater detail in this report in the section on distance (section 4.1) an Irish study in 2008 found that distance is an important perceived barrier to active commuting and a predictor of mode choice among adolescents. A 1.6km increase in distance from school decreases the odds of active commuting by 71%. Other [studies found](#) that the walkable distance to school varied

based on age. For this reason, this Department is recommending the optimum distance being 1km at primary level and 2km at post primary to school of attendance, with the exception for all cities and certain towns where public transport is widely available. In this scenario, pupils will not be eligible for STS where they can avail of public transport.

In order to promote current levels of active transport and one of the recommendations of this review in relation to pricing not to provide free school transport. As highlighted in the Fare-Free Travel policy analysis carried out by the National Transport Authority Free transport disincentives active travel. The policy has reported results of an increase in public transport patronage of approximately 22%. This increase is driven by a reduction in walking by 7%, a reduction in cycling by 13% but only a reduction of 1% in car trips, and an increase in total overall trips.

Several actions under the remit of the Department of Transport are aimed at promoting Active Travel. School transport will have an important role in contributing to these outcomes, including the following:

- Safe Routes to School -Expanding the number of safe, accessible, walking and cycling routes, through the provision of 500 Safe Routes to School schemes and the rollout of over 1,000 kilometres in active travel infrastructure;
- The Climate Action Plan 2023 sets out how Ireland can accelerate the actions that are required to respond to the climate crisis, putting climate solutions at the centre of Ireland’s social and economic development. Regarding transforming how we travel; the plan sets out the following in relation to active travel.
  - Walking, cycling and public transport to account for 50% of our journeys by 2030
  - Increase walking and cycling networks.
- Green-Schools Travel and Global Citizenship Travel are funded by the Department of Transport and supported by the National Transport Authority. The aim of the scheme is to increase the number of students and teachers who actively travel to school (walk, cycle, and scoot) as well as promoting other sustainable journeys (school bus, park and stride, carpool, and public transport). The programme has been delivered to over 2,000 schools (primary, post primary and special education needs) nationwide, representing over 465,000 students and 36,000 teachers.
- Active Travel Investment Programme - The Active Travel Grants Programme funds important projects supporting strategic pedestrian and cyclist routes, access to schools, permeability links, urban greenways and some minor public transport improvement projects

In addition to the above, Better Outcomes, Brighter Futures (2014-2020) is a whole-of-Government policy and a clear, comprehensive statement setting out how we intend to do our best to achieve the best for children, young people and families Improving childhood health and wellbeing .This framework confirms a cross-Governmental approach, in line with the goals of Healthy Ireland, to seek to improve all aspects of health and wellbeing .This will be achieved through commitments made to promote healthier lifestyles, improve mental health literacy and early intervention services, and increase the number of children and young people with a healthy weight, engaging the whole community in healthier more active lifestyles. Quality, effective support and services address the full range of children and young people’s needs; they are provided in child-/youth-friendly settings and

are delivered in ways that make them accessible to all children and young people. The Government recognises children and young people in rural and island communities may face difficulties in accessing services. Child friendly communities cover issues about access to local services, amenities, schools and good quality public transport; streets and residential areas that are safe for walking and cycling; and the provision of outdoor green spaces for play, recreation and sport.

Being active and healthy is a significant contributor to overall wellbeing. By promoting the integration of Active Travel and school transport this can actively contribute to supporting *the Better Outcomes, Brighter Futures* policy. By maintaining school transport services on routes in rural areas, especially those routes with minimum numbers which are more rurally based and mostly based in deprived area as referenced in the CBA this also supports children and young people in rural Ireland in accessing services which may not otherwise be available.

It is noted that many children and young people in Ireland enjoy good health. However, there are some significant health challenges, including obesity - 6% of 13-year-olds are obese and a further 20% are overweight. The aims are that all children and young people are physically healthy and able to make positive health choices. By focusing more on educational and encouragement efforts, this can make walking to school seem like an attractive, if not the most attractive, option where it is possible to do so.

It is also noted in the “Our Rural Future” policy that with regard to “Cycling Infrastructure in Rural Areas” that the Programme for Government places an emphasis on improving our transport infrastructure to ensure that people can travel more safely by bicycle or by walking in our towns and cities. The Government has committed to investing €1.8 billion in walking and cycling over its period in office. This will facilitate a step-change in the number of people journeying by bicycle or foot on a daily basis. The Programme for Government also envisages that every Local Authority, with assistance from the National Transport Authority, will adopt a high-quality cycling policy, carry out an assessment of their roads network and develop cycle network plans which will be implemented with the help of a suitably qualified Active Travel Officer with clear powers and roles. While cycling networks are mostly associated with urban travel, there is huge potential for cycling within and between rural towns and villages, and particularly in the hinterland of rural towns. The Government has committed a €50 million fund in 2021 for Local Authority investment in high-quality walking and cycling infrastructure, specifically targeted at towns and villages across the country. These measures can contribute to more pupils choosing active travel to school in the future.

### Recommendation 6.1

It is recommended that both the distance and pricing criteria set out in the eligibility criteria of the School Transport Scheme will support active travel and the alignment with the schools sector climate action mandate. It is recommended that School Transport Section should work in an across Government approach in relation to coordinating efforts for active travel to school. This focus will be on educational and encouragement efforts, to make walking to school seem like the most attractive choice. School Transport Section (STS) will also work with the Safe Routes to School Programme (SRTS) to ensure a safe environment around schools and ensures that both SRTS and STS align when it comes to route planning the role out of new walkway and footpaths in and around schools. In

addition, the Department, in conjunction with the of Department of Transport’s National Demand Management Strategy should continue to support the implementation of measures to support active travel.

It is noted that officials from School Transport Section are members of the cross-departmental Steering Group for the Department of Transport’s National Demand Management Strategy. In support of achieving the Climate Action Plan 2023 target of reducing total vehicle kilometres travelled by 20% by 2030, and as part of the ambition to halve transport emissions by 2030, the CAP committed to developing and publishing a National Demand Management Strategy. The Steering Group that has recently been established will have responsibility for shaping the development of this policy.

## 6.2 Integration with public transport

As referenced in “Our Rural Future”, connectivity, whether through transport links or digital connectivity, is hugely important for people who live and work in rural areas. Improvement and further integration of rural public transport services will enable people to continue to live in rural areas and to access work, education and social activities. In this context, the Government has committed to protect and expand regional bus connectivity and connectivity between towns and villages in rural Ireland.

As referenced in Phase 2, *Connecting Ireland* is a major public transport initiative developed by the National Transport Authority (NTA) with the aim of increasing connectivity, particularly for people living outside major cities and towns. The plan aims to improve mobility in rural areas, and it will do this by providing better connections between villages and towns by linking these areas with an enhanced regional network connecting cities and regional centres nationwide.

Connecting Ireland seeks to make public transport for rural communities more useful for more people, and it will do this by:

- Improving existing services;
- Adding new services; and
- Enhancing the current Demand Responsive Transport (DRT) network which meets the transport needs of people who live in remote locations.

As part of the Connecting Ireland initiative, the NTA completed a comprehensive assessment of the existing network of regular public transport services operating across the country on a county-by-county basis. This has given a clear understanding of how well the public transport network currently serves towns and villages in terms of service levels at certain times of the day and days of the week. It has also helped to clearly identify the issues such as gaps in the network where the option to use public transport is not available.

Ireland is not densely populated. Outside the major urban centres, Ireland's settlement pattern is distributed in a highly dispersed manner. As demonstrated by Indecon in the CBA Ireland has the lowest percentage of the population living in urban areas and Ireland's rate of urbanisation is significantly below the EU average. As demonstrated in the CBA, rural communities typically rely more on private cars, have fewer public transport options and are typically significantly further from services, including schools, than households living in more urban environments. As such, as a country with a relatively low proportion of the population living in urban areas, the case for the provision of a public school transport service to facilitate the needs of this cohort of the population is stronger than in many of our European peers. However, due to our dispersed settlement patterns, it is difficult to cost-effectively organise public transport services to cater to everyone's needs. In very isolated rural areas, the need for transport is high but the demand for travel may be so low as to preclude the provision of traditional bus services. These needs may be more readily met by innovative means, such as demand responsive services, local hackney services or community car or other shared mobility schemes. Other factors complicating the delivery of effective public transport in rural Ireland include the trend, at least until recently, of an aging demographic.

The NTA has recently finalised proposals for Connecting Ireland and has commenced the rollout of new and improved services which will be completed on a phased basis from 2022 to 2025.

It is also worth noting that the NTA recently commenced a pilot integrated TFI Local Link public transport project in Co. Leitrim which is useful in considering future potential for integration of school transport and public transport. The integrated pilot project for Leitrim consisted of the National Transport Authority (NTA) and the Donegal Sligo Leitrim Transport Coordination Unit (TCU) working closely with the HSE (Health Service Executive) to plan and develop a revised network of TFI Local Link services for Co. Leitrim. The services are designed to meet the needs of mainstream public transport users as well as the transport needs of passengers accessing (non-emergency) health care services. The first phase was implemented on 28<sup>th</sup> June 2021, with all services now introduced.

As referenced above, the NTA recently launched the *Connecting Ireland Rural Mobility Plan*, which identifies gaps in connectivity across the country, excluding the Greater Dublin Area (GDA), regional cities and large towns. *Connecting Ireland* proposes enhancing existing services, adding new bus routes and new services, in addition to expanding the demand responsive local bus network. The revised services for the Leitrim project are aligned with *Connecting Ireland* and have significantly increased the connectivity between locations and improved access to facilities and services.

Prior to the roll out of this pilot project, the TCU procured and managed a number of 'closed' transport routes on behalf of the HSE with a charge applicable to all users of these services. These routes served a range of HSE day services including mental health, intellectual disabilities and older people services. The revised network and timetable amalgamates all of these 'closed' routes into mainstream public transport, providing fully integrated and accessible services which are covered by the Free Travel Scheme.

As recommended earlier in this report, and in order to support school and public transport integration, distance eligibility for school transport will be considered for areas where there is currently no public

transport alternatives. This distance criteria allows for the greatest net benefits over the appraisal period as identified in the CBA report and is the minimum criteria that needs to be met to reach 69% of the Climate Action Plan 2023 targets. These distances also align to active travel initiatives, allow for greater support to working parents and align with many other rural initiatives including Safe Routes to schools, improved road safety, health benefits and other government approved plans/programmes, Connecting Ireland, Our Rural Future and the National Planning framework.

Equally in areas where there are school transport services operating with less than 10 children, consideration will be given to accommodating these children on public transport where possible.

### Recommendation 6.2

It is recommended that the Department should liaise further with the NTA on the Connecting Ireland project which is currently in implementation phase. The Department of Education, the Department of Transport and the NTA should continue to engage and to share data and information with a view to establishing where potential synergies may exist. As the Connecting Ireland project is rolled out nationwide and as more public transport services become available integration of school and public transport should continue to be pursued.

Initiatives such as the eTicketing project currently being piloted by the Department and Bus Éireann should ensure that all future ticketing is fully compatible with NTA next generation ticketing so that in the longer term this will support and facilitate integration of school and public transport.

As set out in recommendation 4.3b earlier in this report, it is recommended that a Working Group be established to comprise members of School Transport Section, the Department of Transport and the NTA by the end of 2023, with an agreed terms of reference to pursue the integration of school transport and public transport where possible, in conjunction with the roll out of the Connecting Ireland project. Integration of school transport and public transport in other jurisdictions (for example, the model in Northern Ireland details of which are set out in chapter 7 of this report) should be assessed by the group to inform future modelling for an integrated scheme in this jurisdiction. Learnings from pathfinder projects, such as the project referred to in section 4.3.b of this report will be valuable to the work of this group and in informing potential for future integration of services.

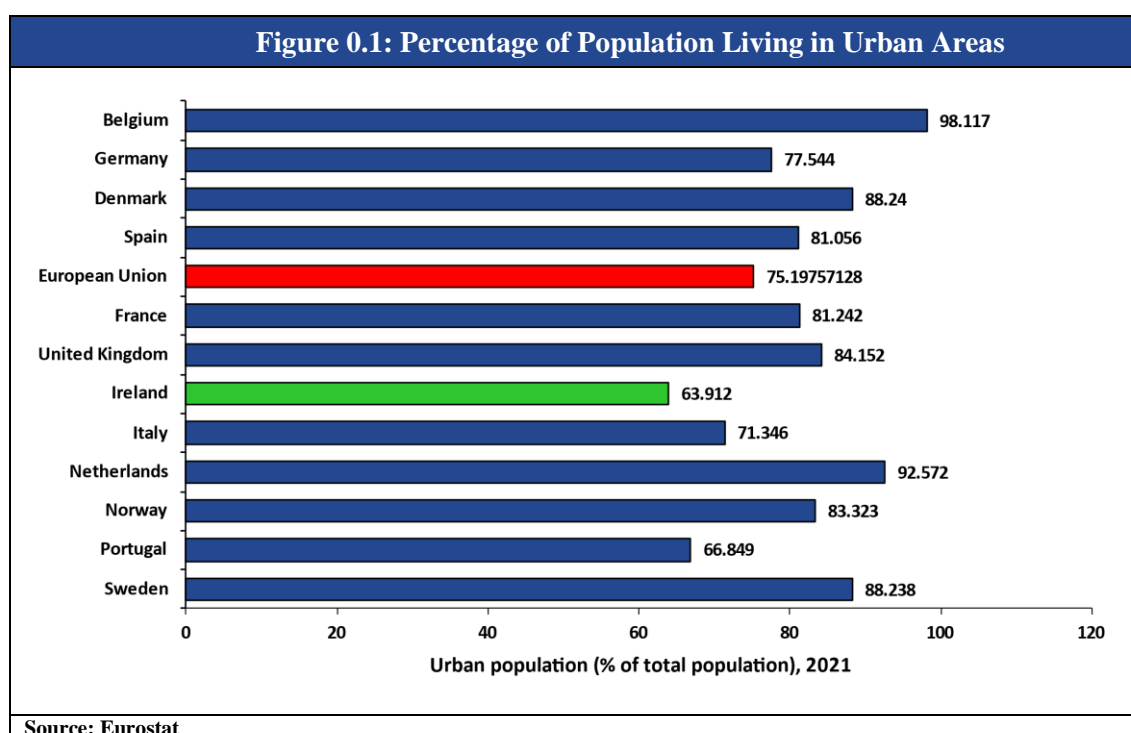


## Chapter 7 — School Transport: an International view

A wider review of the school transport services offered in other EU member states can be found in the Stage 2 report. This section briefly outlines the evidence in terms of the need for a school transport service in and Irish context compared to some comparative countries as well as an analysis of the costs to users of school transport services in some other jurisdictions.

### Urbanisation Rates

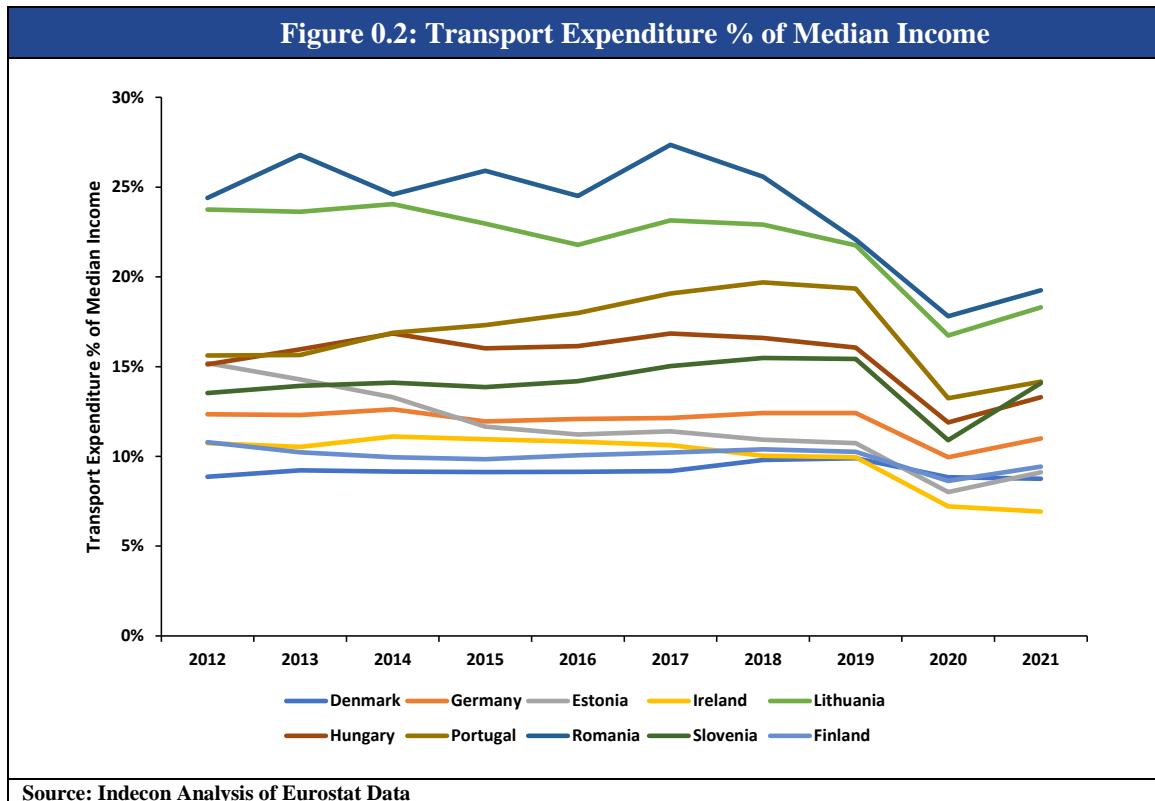
The figure below illustrates the comparative rates of urbanisation across a number of European countries. Ireland has the lowest percentage of the population living in urban areas of the countries listed here and Ireland's rate of urbanisation is significantly below the EU average. As demonstrated elsewhere in this report, rural communities typically rely more on private cars, have fewer public transport options and are typically significantly further from services, including schools, than households living in more urban environments. As such, as a country with a relatively low proportion of the population living in urban areas, the case for the provision of a public school transport service to facilitate the needs of this cohort of the population is potentially stronger than in many of our European peers.



### Transport Costs

Eurostat data demonstrates that in 2021, transport costs as a percentage of median income ranged from 19% in Romania to 7% in Ireland according. In monetary terms, transport costs per capita in Romania were €930 while transport costs per capita in Ireland were more than double that at €1,950.

While this data relates to transport spending in general per capita across the EU, it is nevertheless informative of the degree to which transportation costs are a burden across each population. Transportation costs in Ireland typically comparable with other relatively high-income countries such as Finland, Denmark and Germany. Lower income countries such as Romania and Lithuania typically have significantly more burdensome transport costs.



While the above data is informative with regards to the profile of transport costs in Ireland and how these compare to similar countries, the data do not focus on the costs of school transport services. Nevertheless, wider transport costs are a factor in the likely demand for school transport services. Where alternative transport costs are high, subsidised or free school transport will be significantly more attractive to many families. However, as evidenced by the above data, relative to other European countries, the cost of transport is unlikely to be a significant factor driving demand for school transport services.

Detailed data on the costs of school transport services in other countries are challenging to collate in a comparable manner given that public schemes are often operated on a municipal basis with differing models, costs and charges (this is the case in Denmark and Germany for example). It is also the case that many other countries offer school transport services for free to most students. Examples of the costs of school transport in some other jurisdictions are outlined below.

## Northern Ireland

The Department of Education is responsible for home to school transport policy and legislation; the Education Authority (EA) is responsible for its operation, administration and delivery. In the last school year approximately 88,857 pupils availed of transport assistance a cost of £101 million.

Eligible pupils receive transport assistance in a number of different ways: on dedicated EA buses (yellow buses), dedicated school buses provided by Translink or private operators, the award of passes for use on public bus/rail/ferry services and, where necessary, some pupils are transported by private taxi.

For SEN students, transport is provided door to door. School bus escorts are employed by their local Education Authority, with some of those employed being classroom assistants for SEN integrated classes. Escorts can be moved around the EA panel area in line with demand, though an increase in SEN services can result in a shortfall of school bus escorts.

The school transport scheme is an essential service in Northern Ireland, particularly in rural areas where many people avail of the post primary transport service. In some cases, however, eligible pupils cannot be provided with a seat on a vehicle. Where this is the case (for example, where there are not enough students to establish a new service), banded transport allowance grants are paid to families. Table 0.2 shows the current rates of annual payment under the different mileage bands for the Northern Irish scheme. These range from £185 for any pupils who live within 4 miles of their school, to £740 for those living beyond 15 miles.

<b>Table 0.2: Parental Payment Mileage Bands under Northern Irish STS</b>		
<b>Mileage Band (distance from home to school)</b>	<b>Current Annual Amount Payment</b>	<b>Annual Amount Payable with 5% increase</b>
Band A - 0 - 3.999 miles	£185	£194
Band B - 4 - 9.999 miles	£465	£488
Band C- 10 - 14.999 miles	£695	£730
Band D- 15+ miles	£740	£777
<i>Source: Northern Ireland Department of Education</i>		

## Eligibility for Assistance under Current Home to School Transport Policy

Circular 1996/411<sup>19</sup> breaks down the provision of transport assistance for qualifying pupils to two criteria: walking distance and suitable school. The walking distance is set in legislation as being 2 miles for primary school pupils and 3 miles for post-primary. A suitable school is a grant-aided school in any of the following categories:

- Catholic maintained

<sup>19</sup> 'Home to School Transport' (1996). Circular Number 1996/41. See: <https://www.education-ni.gov.uk/sites/default/files/publications/de/1996-41-home-to-school-transport-updated.pdf>

- Irish Medium
- Controlled or Other Voluntary
- Integrated
- Grammar (denominational)
- Grammar (non-denominational)

Therefore, a pupil will currently be eligible for transport assistance: (i) if they live beyond the relevant distance criterion and attend a suitable school; and (ii) they have been refused a place in all suitable schools in their chosen school category within 2 miles of their house (3 miles for post-primary). A pupil may also be eligible for transport assistance if they have statement of special educational needs that specifies a special transport need.

The Department undertook a review of the school transport scheme in 2018 which is currently on hold since March 2020 due to a wider independent review of the NI Education system.

### Cost and Usage of Scheme

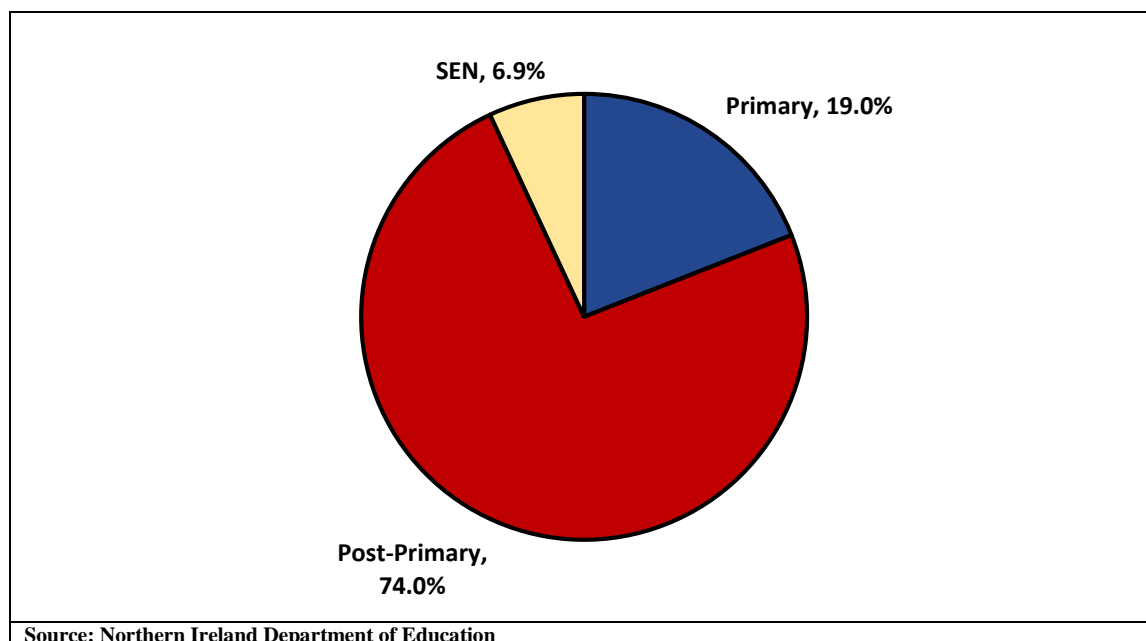
Table 0.3 shows that total costs, total pupil numbers, and total average cost per pupil have steadily increased. In the most recent year (2021-22), 88,857 availed of the school transport scheme in Northern Ireland, at a total cost of over £101m, and an average cost per pupil of £1,142. Around £40m of these costs were attributed to transport for students with special educational needs.

<b>Table 0.3: Annual Total Usage and Expenditure of Northern Ireland STS</b>			
<b>School Year</b>	<b>Total Costs, £m</b>	<b>Total Pupil Numbers</b>	<b>Average Cost Per Pupil, £</b>
2021-2022	101.4	88,857	1,142
2020-2021	94.9	87,502	1,084
2019-2020	91.3	86,127	1,060
2018-2019	86.1	84,390	1,020

*Source: Northern Ireland Department of Education*

In terms of usage by school type, Figure 0.3 shows that the overwhelming number of users (74%) were from post-primary schools in 2021-22. These users cover a range of school types, including controlled, maintained, controlled integrated, Irish medium, controlled and voluntary grammar, and special schools. This proportion of users by school type has been reasonably consistent in recent years, with 74% and 73% of users being from post-primary schools in 2020-21 and 2019-20 respectively.

**Figure 0.3: Breakdown of STS Usage by School Type, 2021-22**



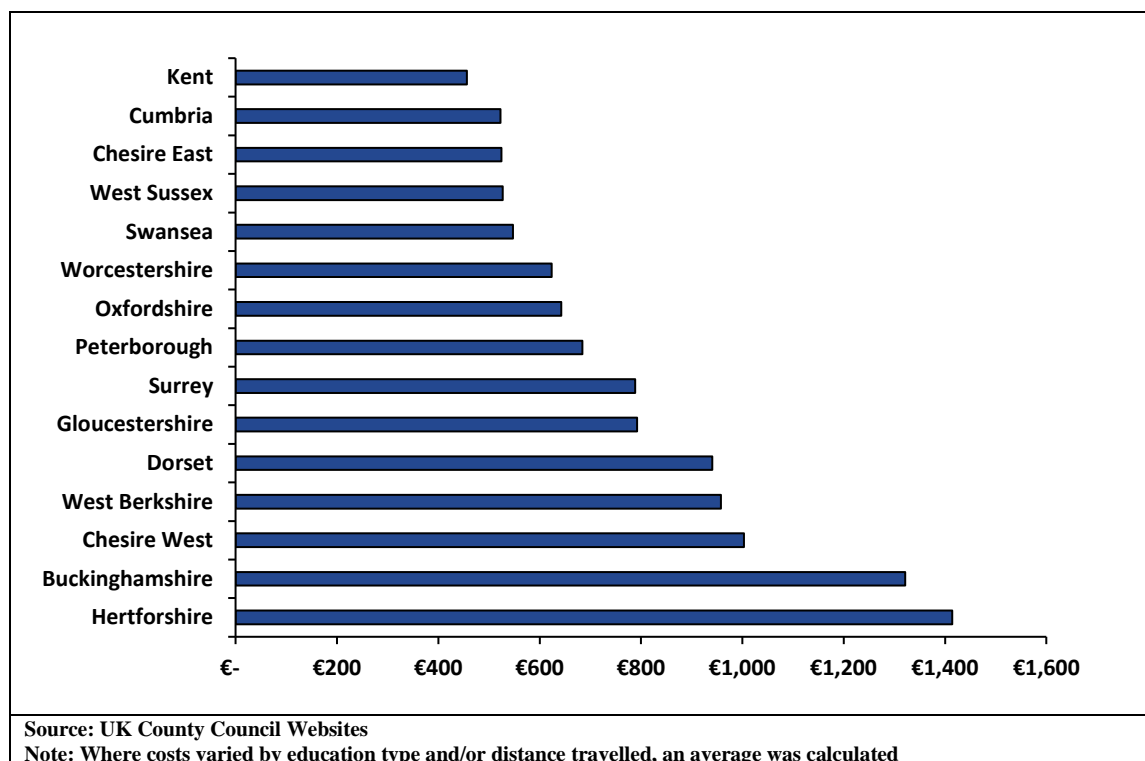
### Rest of the United Kingdom

The UK operates a Spare Seat Scheme for pupils who do not qualify for free school transport. This scheme is only offered where there is spare seating on school buses operating for students to and from school. Seats are guaranteed for the period paid but may not always be available if there are no spare seats. The scheme is operated at the county level whereby county councils set costs.

For some counties, the cost of the scheme varied by the type of education and the distance travelled. Gloucestershire County Council charged €627 (£550) for primary school pupils and €958 (£840) for secondary school pupils. Oxfordshire County Council charged €449 (£394) for students travelling less than 3 miles and €836 (£733) for students travelling greater than 3 miles. Other county councils, such as Buckinghamshire, had an even wider variety of charges based on age, payment choice and distance travelled.

The figure below shows the range of costs across 15 counties in the UK. Hertfordshire and Buckinghamshire are the most expensive with annual costs of €1,414 (£1,241) and €1,321 (£1,159) respectively. Kent is the cheapest with an annual cost of €456 (£400).

**Figure 0.4: Annual Cost of School Transport using the Spare Seat Scheme**



### United States

Historically, the US offered a free bus service to and from schools, but states have slowly begun to offset costs onto the parents of students. In Massachusetts, Framingham Public Schools charge an annual fee of €237 (\$250), with a maximum of €473 (\$500) per family for students entering grades K–6 who live within 2 miles of their assigned school and all students grades 7–12.<sup>20</sup> Canton Public Schools in Massachusetts charge €484 (\$300) for the first child with a cap of €805 (\$850) for students in grades kindergarten through grade 6, living 2 miles or more from their school.<sup>21</sup> Other districts across the US such as Jeffco Public Schools in Colorado and Poway Unified School District in California charge €142 (\$150) and €544 (\$575) respectively.<sup>22</sup>

Costs passed onto parents will be determined to some degree by the cost of running the service. This costs to the state or municipal authorities varies largely by jurisdiction. The following table shows the average cost of transport for students bused to school by state. The average yearly cost across all

<sup>20</sup>

<https://www.framingham.k12.ma.us/Page/6718#:~:text=English-,English,to%20pay%20the%20bus%20fee.>

<sup>21</sup><https://campussuite-storage.s3.amazonaws.com/prod/1558554/bd663f84-57ae-11e8-92d9-124581a691ce/2256963/d5e082a4-a80f11eb-b100-02e56e5fc083/file/Transportation%20Letter%202021-22.pdf>

<sup>22</sup> <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2015/6/16/school-districts-are-billing-parents-for-bus-rides>

states shown below was €642 (\$675). The most expensive state was Hawaii where the annual cost of transportation for a pupil was €7,348 (\$7,735). The cheapest state was Connecticut where average annual costs are €74 (\$78). There are a range of factors impacting on the costs of providing services including distances travelled, the number of students, vehicle running cost, labour costs and a range of other potential cost items. As such, while the below figures are indicative of the variation on costs across states, direct comparisons to the costs in Ireland or other countries would not be informative.

<b>Table 0.4: Average Transportation Cost Per Pupil Bused</b>			
<b>State</b>	<b>Average Cost (€)</b>	<b>State</b>	<b>Average Cost (€)</b>
Alabama	725	Montana	173
Alaska	118	Nebraska	555
Arizona	791	New Hampshire	414
California	801	New Jersey	502
Colorado	130	New Mexico	545
Connecticut	74	New York	517
Delaware	590	North Carolina	385
Florida	405	North Dakota	884
Georgia	145	Ohio	489
Hawaii	7,348	Oregon	456
Idaho	606	Pennsylvania	612
Illinois	485	South Carolina	268
Iowa	371	Tennessee	416
Kansas	394	Texas	198
Kentucky	605	Utah	387
Louisiana	402	Virginia	186
Maine	246	Washington	393
Minnesota	469	West Virginia	665
Missouri	578	Wyoming	1,054
<b>State Average</b>		<b>642</b>	
<b>Source: Safe Routes Partnership</b>			

### Australia

Costs vary by territory in Australia. In New South Wales, the School Drive Subsidy is available to students with no public transport. There is a subsidy of €.45 (AUD .7) per km driven by car and €.22 (AUD .35) per km driven by motorcycle or boat.<sup>23</sup>

In Queensland there are maximum costs for school bus services depending on distance travelled.<sup>24</sup> This is shown below in Figure 0.5. These figures represent the maximum fare per journey which can

<sup>23</sup> <https://transportnsw.info/tickets-opal/ticket-eligibility-concessions/school-student-travel/guide-to-school-drive-subsidy>

<sup>24</sup>

be charged by a school bus operator to a student, depending on the distances travelled. These fares only apply to journeys which are not already directed funded by the Department of Transport and Main Roads.



**Figure 0.5: School Transport Maximum Cash Fare Schedule Effective 27 January 2021 (inclusive of GST)**

Distance			Distance		
Categories	Primary	Secondary	Categories	Primary	Secondary
0.0km to 1.6km	\$1.40	\$1.80	> 59.2km to 60.8km	\$9.50	\$12.60
> 1.6km to 3.2km	\$1.80	\$2.40	> 60.8km to 62.4km	\$9.60	\$12.70
> 3.2km to 4.8km	\$2.30	\$3.20	> 62.4km to 64.0km	\$9.90	\$13.10
> 4.8km to 6.4km	\$2.80	\$3.50	> 64.0km to 65.6km	\$10.00	\$13.30
> 6.4km to 8.0km	\$3.10	\$3.90	> 65.6km to 67.2km	\$10.10	\$13.50
> 8.0km to 9.6km	\$3.30	\$4.40	> 67.2km to 68.8km	\$10.20	\$13.90
> 9.6km to 11.2km	\$3.60	\$4.60	> 68.8km to 70.4km	\$10.40	\$14.00
> 11.2km to 12.8km	\$3.80	\$5.10	> 70.4km to 72.0km	\$10.50	\$14.30
> 12.8km to 14.4km	\$4.10	\$5.40	> 72.0km to 73.6km	\$11.00	\$14.50
> 14.4km to 16.0km	\$4.40	\$5.70	> 73.6km to 75.2km	\$11.20	\$14.70
> 16.0km to 17.6km	\$4.60	\$6.00	> 75.2km to 76.8km	\$11.40	\$14.80
> 17.6km to 19.2km	\$4.80	\$6.20	> 76.8km to 78.4km	\$11.50	\$15.40
> 19.2km to 20.8km	\$5.10	\$6.70	> 78.4km to 80.0km	\$11.60	\$15.60
> 20.8km to 22.4km	\$5.30	\$7.10	> 80.0km to 81.6km	\$11.80	\$15.80
> 22.4km to 24.0km	\$5.40	\$7.20	> 81.6km to 83.2km	\$11.90	\$16.00
> 24.0km to 25.6km	\$5.50	\$7.50	> 83.2km to 84.8km	\$12.10	\$16.10
> 25.6km to 27.2km	\$5.70	\$7.70	> 84.8km to 86.4km	\$12.20	\$16.40
> 27.2km to 28.8km	\$5.80	\$8.00	> 86.4km to 88.0km	\$12.50	\$16.50
> 28.8km to 30.4km	\$6.00	\$8.30	> 88.0km to 89.6km	\$12.60	\$16.70
> 30.4km to 32.0km	\$6.20	\$8.50	> 89.6km to 91.2km	\$12.70	\$17.10
> 32.0km to 33.6km	\$6.50	\$8.70	> 91.2km to 92.8km	\$12.80	\$17.30
> 33.6km to 35.2km	\$6.60	\$9.00	> 92.8km to 94.4km	\$13.20	\$17.50
> 35.2km to 36.8km	\$7.00	\$9.20	> 94.4km to 96.0km	\$13.30	\$17.70
> 36.8km to 38.4km	\$7.10	\$9.40	> 96.0km to 97.6km	\$13.50	\$17.80
> 38.4km to 40.0km	\$7.20	\$9.50	> 97.6km to 99.2km	\$13.60	\$18.10
> 40.0km to 41.6km	\$7.40	\$9.90	> 99.2km to 100.8km	\$13.90	\$18.40
> 41.6km to 43.2km	\$7.60	\$10.00			
> 43.2km to 44.8km	\$7.70	\$10.20			
> 44.8km to 46.4km	\$8.00	\$10.40			
> 46.4km to 48.0km	\$8.10	\$10.80			
> 48.0km to 49.6km	\$8.30	\$11.20			
> 49.6km to 51.2km	\$8.40	\$11.30			
> 51.2km to 52.8km	\$8.60	\$11.50			
> 52.8km to 54.4km	\$8.70	\$11.70			
> 54.4km to 56.0km	\$9.10	\$11.90			
> 56.0km to 57.6km	\$9.20	\$12.10			
> 57.6km to 59.2km	\$9.30	\$12.30			

**Maximum adult cash fare  
= 2 X single primary fare**

Source: Queensland Government, Department of Transport and Main Roads

This brief review of school transport services internationally should be read as complementary to the review of school transport services undertaken as part of the Stage 2 report in the wider review of the School Transport Scheme being undertaken by the Department. An important consideration when reviewing the findings of this section is that many international examples of school transport services are provided free of charge at the point of service and, as such, do not lend themselves to a direct comparison to the fees charged or proposed for future models of School Transport Scheme in Ireland.

## Chapter 8 Summary of all Recommendations for Future Operation of the Schemes

### Summary Table of Recommendations

Ref No.	Topic	Recommendation	Relevant CBA Option	Recommended timeline to implement
4.1	<b>Distance</b>  A) Mainstream B) SEN	<p>A) Mainstream - the current distance criteria on the primary and post-primary schemes should be reduced, with the optimum distance being 1km at primary level and 2km at post primary, with the exception for all cities and certain towns where public transport is widely available. This is to be done on a phased basis to allow for capacity to build, with an initial reduction to 2km on both schemes</p> <p>B) SEN - It is recommended that there be no changes to the eligibility criteria for this scheme, in that the scheme will continue to provide transport for eligible children to the nearest school that is or can be resourced to meet their special educational needs and that this will continue to be determined in consultation with the NCSE. However, a Working Group should be established before the end of 2023 to enable ongoing improvements to the SEN Scheme</p>	Option 1	<p>Mainstream –Phase 1- to 2kms on both schemes for 2024/25 school year.</p> <p>Phase 2 – to 1km at primary and 2km at post-primary for 2025/26 school year.</p> <p>SEN – establish Working Group by the end of 2023 to enable ongoing improvements to the SEN scheme.</p>
4.2	A) Ethos	It is recommended that there be no change to the current eligibility criteria with regard to ethos, in that transport should be provided to the nearest school having regard to ethos. However, it is recommended that the wording in the published schemes be updated to reflect the different way ethos is treated on the primary and post-primary schemes.	Option 1	The schemes should be re-written and published in advance of the application process for the 2024/2025 school year.
	B) Language	It is recommended that there be no change to the current eligibility criteria with regard to language, in that transport should continue to be provided to the nearest school having regard to language. The scheme should continue to facilitate access for	Option 1	N/A

		children to their nearest all-English or all-Irish school/unit		
<b>4.3</b>	<b>Demand</b>  A) Concessionary Applicants	It is recommended that the term concessionary ticket be removed from the scheme and will be replaced with the term “not eligible/spare seats”. Children who are not eligible may still apply for school transport within the prescribed application timelines but will only be accommodated where capacity exists (where there are spare seats) once all eligible children have been catered for.	N/A	The published schemes should be re-written to reflect this change in time for applications for the 2024/2025 school year.
	B) Minimum Numbers Criteria	It is recommended that routes with minimum numbers of less than 10 pupils be maintained for ongoing consultation with the Department of Transport and the NTA with a view to being regularised for potential to transfer some or part of these routes to public services routes.  It is recommended that a Working Group be established to comprise members of School Transport Section, the Department of Transport and the NTA by the end of 2023, with an agreed terms of reference, to review and implement the transfer of routes with less than 10 pupils to public transport where possible and in conjunction with the roll out of the Connecting Ireland project. With effect from the start of the 2024/2025 school year, all routes with less than 10 pupils should be identified and the options for integration with public transport should be assessed and pursued by this Working Group.  In the case of a new school not served by an existing route or in the case of parental demand for a new route, it is recommended that consultation should take place with the Department’s Planning and Building Unit on the planning area to be served to assist in route design establish a new route where there is a minimum of 10 new applicants.	Option 1	The Working Group is be established to by the end of 2023, with an agreed terms of reference to review and implement the transfer of routes with less than 10 pupils to public transport.  With effect from the start of the 2024/2025 school year, all routes with less than pupils should be identified and the options for integration with public transport should be assessed and pursued by this Working Group.  The published schemes should be re-written to reflect this change in time for applications for the 2024/2025 school year.
	C) Nearest School Criteria	It is recommended that the nearest school criteria be eliminated. Under this recommendation all existing routes to existing schools will be maintained and will cater for all applicants who meet the distance criteria. In the case of a new	Option 1	This change will apply with effect from the start of the 2024/2025 school year.

		school not served by an existing route or in the case of parental demand for a new route, consultation will be required with the Department’s Planning and Building Unit the area to be served to assist in route design.		The published schemes should be re-written to reflect this change in time for applications for the 2024/2025 school year.
<b>4.4</b>	<b>Inclusivity</b>	<p>As referenced in Recommendation 4.1.b, it is recommended that a working group be established to comprise members of School Transport Section and Special Education Section of the Department, the National Council for Special Education and Bus Éireann to facilitate and enable ongoing improvements to the scheme. It is recommended that this group be established by the end of 2023 and that terms of reference for the group are agreed within that timeframe also.</p> <p>It is recommended that in the short term (for the 2024/2025 school year), this group should examine changes to the application form for families so they can indicate that they wish for their child to travel on mainstream services where such transport is in operation and to identify if the child could only do this with the support of a School Bus Escort. This process should be in place for transport applications for the 2024/2025 school year.</p> <p>In the medium to longer term, and as a future phase of work, the Department of Education should continue to engage with the NCSE. School Transport Section will continue to work with the Department’s School Planning and Building Unit and the National Council for Special Education (NCSE) to work towards a more inclusive and integrated approach.</p>	Option 1	<p>Establish Working Group by the end of 2023 to enable ongoing improvements to the SEN scheme, including reviewing changes to the current application form with a view to supporting integration and inclusivity with children with SEN.</p> <p>The initial aim as per the CBA is for 20% of children currently travelling on SEN services to be able to travel on mainstream services.</p>
<b>4.5</b>	<b>Pricing</b>  A) Mainstream (including medical card holders)	<p>It is recommended that a fee should be charged to those families applying to use School Transport Scheme services. It is recommended that the charge should be the charge that has been introduced for the 2023/2024 school year, i.e., €50 per primary pupil, €75 per post-primary pupil, with an overall family cap of €125. This fee should be reviewed when more data is available from the eTicketing project and when more detailed information on ticket usage is available,</p> <p>It is recommended that there continue to be no charge for children who hold a full medical card.</p>	Option 1	<p>Fees to apply for the 2023/2024 school year.</p> <p>Review charges in 2025.</p>

		However, it is recommended that this should be reviewed when the eTicketing project is rolled out nationally and when more detailed information on ticket usage is available.		
	B) SEN Scheme	It is recommended that there continue to be no charge for children travelling on the SEN Transport Scheme, However, it is recommended that this be reviewed when eTicketing is rolled out nationally and when more detailed information on ticket usage is available.	N/A	Review of ticket charges in 2025
4.6	<b>Exceptional Circumstances</b>	It is recommended that this agreed process be continued to assist with such exceptional circumstances to minimise the risk of non-attendance at school.  It is also recommended that other transport options be examined with the Department of Transport/NTA, where there are transport solutions available such as Local Link Services in rural locations. Furthermore, funding as a temporary measure could be made directly to schools to arrange transport on a short-term exceptional basis.	N/A	Ongoing.  This will form part of the work of the Working Group to be established as referenced in 4.3 B). This group is to be established in 2023.
5.1	<b>Rate of Grants</b>  A) <b>Remote Area Grant</b> B) <b>Special Transport Grant</b>	A) Remote Area Grant – it is recommended that there be no change to the current rate. B) Special Transport Grant – It is recommended that with effect from the start of the 2024/2025 school year that the rate of the Special Transport Grant be increased in line with the 2022 Civil Service Motor Travel Rates. The rate should be increased to 41.80 cent for the first 6,437 kilometres travelled and 31.78 cent per kilometre for each kilometre travelled thereafter.	N/A	Remote Area Grant – N/A. Current rate remains in place.  Special Transport Grant – rate to be increased for the 2024/2025 school year.
5.2	<b>Application Process and Payment Timeline</b>  A) Primary and Post-Primary schemes.	<b>Process:</b> Recommended technological improvements to the current on-line application system are covered in recommendation 5.4.a.  <b>Timeline:</b> It is recommended that the family portal should open by the beginning of February for applications for primary and post-primary transport for the school year commencing the following September. It is recommended that the closing date for new applicants be the last Friday in April.	N/A	It is recommended that these application payment dates be put in place for applications for the 2024/2025 school year, pending confirmation that the technological changes required can be made to

		<p>It is recommended that the facility to pay/enter medical card details be open from when the family portal opens at the beginning of February and that the closing date to pay/enter medical card details should be the Friday after the June bank holiday weekend to allow Bus Éireann adequate time to plan and to ensure timely issuing of tickets and communications with families. It is recommended that the family portal should close for a three-week period following the closing date for payment/entering medical card details for the reasons as outlined above.</p> <p>All applicants apply when the portal re-opens are late applicants and are not guaranteed a seat. Seats will only be offered if there are spare seats available once all applicants who applied and paid on time have been allocated with tickets.</p>		allow this to be achieved,
	B) Special Educational Needs Scheme	<p><b>Timeline:</b> It is recommended that parents/guardians are continued to be encouraged to submit applications by the last Friday in April in any given year for transport for the following September. It is further recommended that applications for the SEN scheme continue to be accepted on a year-round basis so as to ensure that children with special educational needs receive the transport they require.</p> <p><b>Process:</b> It is recommended that the initial work that has commenced with School Transport Section, the NCSE and Bus Éireann in regard to creating an online application form should be progressed with a view to having an online application facility available for the 2024/2025 school year.</p>	N/A	The application form should be updated for applications for the 2024/2025 school year.
5.3	<b>Methodology for measuring distance</b>	It is recommended that the methodology for measuring distance to determine eligibility be updated in line with contemporary methodology to measures routes traversable by road, such as modern mapping technology or GIS technology.	All options	School Transport Section and Bus Éireann should commence this work during 2023 and amended methodology for measuring distance

				for eligibility purposes should be in place for the 2025/2026 school year at the latest.	
<b>5.4.a</b>	<b>Technology/ improvements</b>	<b>IT</b>	5.4.a - Within School Transport Section, there are a number of forms which are currently in use in which require updating to a more secure online process which, when complete will improve efficiencies and effectiveness within the section and the security of the data concerned. It is recommended that the work underway be completed.	N/A	5.4.a - It is recommended that the work underway within School Transport Section should be completed to ensure that online secure processes are in place for the 2024/2025 school year.
<b>5.4.b</b>					5.4.b – It is recommended that the Department and Bus Éireann should continue to explore and implement improved technology to increase accountability, information to improve planning and resource allocation and simpler, more customer friendly and transparent interfaces. It is recommended that a Working Group be established during 2023 to comprise members of School Transport Section and Bus Éireann to continue to explore potential improvements.
<b>5.5</b>	<b>Bus Escorts</b>		It is recommended that the work underway by School Transport Section be completed in order to issue an information pack to schools by the start of the 2024/2025 school year. It is recommended that School Transport Section also review pay rates and other employment matters for School Bus Escorts and that these matters be reviewed in full by the end of 2024.	N/A	Information pack to be made available to schools for the start of the 2024/2025 school year.  Review of pay and employment matters to be completed by the end of 2024.
<b>6.1</b>	<b>Active Travel</b>		It is recommended that School Transport Section should work in an across-Government approach in relation to coordinating efforts for active travel. The Department, in conjunction with the Department of Transport's National Demand Management Strategy should continue to support	N/A	Policies to be developed by the end of 2023.

		the implementation of measures to support active travel.		
<b>6.2</b>	<b>Integration with Public Transport</b>	As set out in recommendation 4.3b, it is recommended that a Working Group be established to comprise members of School Transport Section, the Department of Transport and the NTA by the end of 2023, with an agreed terms of reference to pursue the integration of school transport and public transport where possible in conjunction with the roll out of the Connecting Ireland project.	Option 1	The Working Group is to be established by the end of 2023.

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## Chapter 9 Conclusions – proposals for the future operation of the scheme and next steps

The financial appraisal conducted by the independent consultants as part of Phase 3 of the review demonstrates that while the School Transport Scheme operates at a significant financial net cost to the Exchequer, the subsequent economic appraisal shows that the Scheme has demonstrable wider economic benefits (while noting that it was not possible to quantify all of the economic benefits, some of which fall outside the Transport Appraisal Framework used in this review). The fact that the School Transport Scheme operates at a financial loss is evidence of its role as a public service and demonstrates that in the absence of the School Transport Scheme, it is unlikely that any private services would fulfil the role of the existing School Transport Scheme. While private alternatives may operate on certain routes, the scale of the financial loss to operate the scheme at its existing and proposed levels of service imply that without the School Transport Scheme the majority of families would have to rely on alternatives modes of transport to and from school and may experience difficulty in getting their children to school.

The analysis further demonstrated that changes to the eligibility criteria for the School Transport Scheme may lead to significant increases in demand for School Transport Scheme services. Changes in eligibility, as well as projections for future student numbers indicate that there is likely to be significant demand for School Transport Scheme services over the coming years. The projected increase in usage of the scheme from broadening the eligibility criteria and lowering the prices is demonstrative of a likely latent demand for school transport services in the population that can potentially be activated by increasing the supply of the service. Activating this demand has potential significant benefits regarding wider policy objectives to reduce car dependency, promote sustainable travel and reduce transport emissions. The economic analysis indicates that providing school transport services to meet this level of demand would represent a net economic benefit to wider society.

Of the six options examined in the CBA (full details of the options examined are set out in chapters 3 and 4 of this report), the economic findings indicate under the integrated analysis, Option 1 has the highest BCR. The financial findings indicate that while Option 4 has the lowest level of financial losses and represents a significant financial cost saving, this option involves the lowest number of



pupils on school transport and imposes the highest cost of school transport on users, both of which outcomes run contrary to wider government policies.

It should be noted that while the economic appraisal has included all costs and benefits of the Scheme which are readily quantifiable and monetisable, it is demonstrated in this review that there are benefits from school transport in terms of independence and life skills for students, as well potentially facilitating labour force participation and employment in rural areas and reducing road congestion. While these benefits are less readily monetised and included in the appraisal, they should not be discounted in the assessment of the role of the School Transport Scheme.

The cost in NPV terms of providing School Transport Scheme services under Option 1 is estimated to be €7.053bn over the 20 year period of the CBA, or an estimated annual average cost in NPV terms of €352.65m. This total is made up of an estimated cost of €3.9bn in NPV terms for the operation of the mainstream School Transport Scheme and €3.1bn in NPV terms for the operation of the SEN element of the scheme. This constitutes an average annual cost over the 20 year period of €196m in NPV terms for the mainstream scheme and €157m in NPV terms for the SEN scheme.

With regard to the analysis conducted on the fiscal sustainability of the Scheme in line with Department of Public Expenditure and Reform guidelines using a 5% growth in costs per annum, under these terms it is not possible for the scheme to be fiscally sustainable as the costs associated with the base year 2019 relate to a smaller number of pupils than those projected to use the Scheme under the options set out in this review and therefore is not comparing like with like. With the projected increase in pupil numbers this adds additional costs at a level above DPER's guidelines on annual cost growth rate of 5%. The pupil numbers carried at the end of the appraisal period under Option 1 is projected to be 211,531, while under the "as-is" option the projected pupil numbers are 113,424.

However, when analysing the costs over the 17-year period 2023 to 2039, this shows an average growth rate for the period of 3.9% for Option 1 compared with an average growth rate of 5.8% for the period 2020 to 2039. This is the case as for the years 2020 to 2022 of the schemes, due to the assumptions on the phasing in of various elements (e.g. new eligible users, integration of SEN and mainstream transport, increased uptake to contribute to CAP targets, etc.) the growth rates are higher because of the number of new students that are assumed to use the scheme, which is much higher than the normal growth rate. Once these are settled, annual growth rates are more reasonable. As can be seen from the analysis, under Option 1 from 2028 onwards the annual growth rate in costs is anticipated to be 3.5%, falling annually thereafter, to as low as 2.6% in 2039.

It must also be noted that when assessing the estimated changes in costs on a per user basis under each option, this provides a more insightful means of comparing the fiscal sustainability of the options. On this basis, accounting for changes in student numbers, use of excess capacity, economies of scale with regard to administrative costs and inflation it can be demonstrated that per pupil costs under each option will increase at a significantly lower rate than the 5% per annum threshold for fiscal sustainability. The modelling undertaken indicates that costs per pupil will increase by an average of between 2.3%-2.8% for each of the 'Do Something' options and by 1.4% for the As-Is option over the appraisal period. On this basis, allowing for the significant difference in projected users under the options, the options can be judged to be fiscally sustainable.

It is recommended that plans be put in place to implement the recommendations of this report, in order for the School Transport Scheme to be able to deliver on its objectives.

It is recognised that there are recommendations that can be achieved in the short term and those that will require a medium to longer lead in time to implement.

**In the short term and for the 2024/2025 school year, the following recommendations should be progressed and implemented:**

- Reduce distance criteria on the mainstream scheme to 2km at both primary and post-primary.
- Establish a Working Group to enable ongoing improvements to the SEN scheme to include reviewing changes to the current application process and the potential for inclusivity on mainstream services.
- Rewrite the published mainstream schemes to reflect the amended eligibility criteria, with regard to distance, ethos, terminology for non-eligible applicants, minimum numbers criteria and nearest school criteria,
- Establish a Working Group to review and identify options for potential integration between school transport and public transport.
- Increase the rate of the Special Transport Grant for the 2024/2025 school year.
- Commence work on the technological improvements required to the application process and timelines, the forms and processes within School Transport Section and the improved technology required by Bus Éireann to operate the scheme in a more efficient and user-friendly way.
- Complete the work underway on the information and guidance for schools on the employment of Bus Escorts.

**Over the time period 2023 to 2028, the following recommendations should be progressed and implemented:**

- Further reduce distance criteria on the mainstream schemes to 1km at primary and 2km at post-primary level.
- Review ticket charges and ticketing options when the eTicketing project is rolled out nationally. The first review should be conducted during 2025.
- Continue to progress the technological improvements required and build on those implemented – for example, the required change in the methodology to measure distance for eligibility and the data to be made available from eTicketing
- Pursue and support measures for active travel initiatives and continue to work across Government to implement such measures, being mindful of commitments in the Climate Action Plan.
- Pursue the potential for further integration of mainstream and SEN services as the availability of additional SEN placements become available locally.
- Pursue the potential for integration of school transport and public transport through the workings of the Working Group to be established, building on the work in the Connecting Ireland Project to explore and utilise where synergies exist and through the potential to integrate school and public transport as is currently done in other jurisdictions.

**Over the time period out to 2033 the following recommendations should be pursued and implemented:**

- Full integration of school and public transport should be pursued and implemented where it is possible to do so.

- SEN services should be fully integrated with mainstream/public transport services where it is possible to do so.

This is the report of the Technical Working Group. As a next step, these recommendations will be presented to the Steering Group for their views, considerations and final recommendations and for onward submission to the Minister for Education.