

Strengthening Ontario's Student Transportation System

Unifor Submission: A New Vision for Student Transportation



Submitted by:

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About Unifor

Unifor is Canada's largest private sector trade union, representing 315,000 members working in every major sector of the economy, including communications, manufacturing, services, resources and transportation industries. Unifor represents 23,000 workers across Canada in the road transportation sector, and is the largest union representing school bus drivers in Ontario, with over 2,000 members across the province.

Introduction

Unifor welcomes the opportunity to provide feedback on the province's New Vision for Student Transportation in Ontario Discussion Paper. Unifor has been a vocal advocate on the need to develop a strong, sustainable and transparent school bus transportation system – a system that works to ensure decent wages and fair working conditions for drivers and that, in turn, provides students with a safe and reliable mode of transportation to and from school.

In 2014, Unifor released a research report entitled [*Steering Clear: Avoiding the RFP Trap*](#), detailing the ways in which the shift towards a competitive bidding model for school bus transportation services in the province has contributed to the erosion of both the quality of transportation services for students and labour conditions for school bus drivers. Since the report's launch, we have engaged in a number of conversations with government officials and private bus operators around these issues. We also raised alarm bells on how the current procurement system would exacerbate an already fragile industry which was seeing a rise in driver shortages and higher than normal turnover rates. Our anticipated fears were realized when in September of 2016, over 2,600 Toronto-area students (300 of them with special needs), were left stranded at their stops due to school bus driver shortages.

While there has been an acknowledgment by key stakeholders that issues exist, we are dismayed that little concrete action has been taken. As such, ongoing driver shortages and transportation delays in many parts of Ontario today are leading to continued frustration and stress by drivers, parents, and students alike. We trust that upon conclusion of these consultations, meaningful steps will be taken, in both the short-term and long-term, to improve school bus transportation services.

Context

RFP Model

Any analysis of the challenges facing Ontario's school bus transportation system requires taking a closer look into the current competitive Request-for-Proposal (RFP) bidding model of student transportation procurement.

The Ontario government began rolling out the RFP system starting in 2009, primarily as a means to curb student transportation costs. However, this transition has instead produced a myriad of problems across

the industry and the province. As highlighted in our Steering Clear report, the current RFP model has increased industry instability and job insecurity for drivers as a result of contract flipping. The insertion of competition and profit-motive in student transportation has also resulted in private operators – many of whom now consist of a handful of large multi-national corporations – to implement aggressive cost-cutting measures which have put a downward pressure on driver wages and working conditions. In addition, this has resulted in the abandonment by private operators of unprofitable routes, closing down of yards, and delays in bus maintenance and repairs.

Unifor does not oppose a fair, open, and transparent procurement model. However, we believe that any procurement model must put the needs of students, drivers and communities at the forefront rather than profit.

Working Conditions for Bus Drivers

Much of the challenge surrounding driver recruitment and retention in several parts of the province is directly related to the difficult and precarious nature school bus driver work has become. Employers often describe the work as a desirable way to “supplement one’s income”. However, what they fail to acknowledge is that drivers are essentially working full-time at a part-time job. Drivers routinely describe how they are paid chronically low-wages, often work unpaid hours, split shifts, receive little to no benefits, and many times need to resort to taking on multiple jobs to make ends meet. Although reliable wage data is unavailable through Statistics Canada, we do know that driver wages often fall close to the minimum wage range (between \$12-\$18 an hour depending on the region), and that school bus drivers are among the lowest paid transit drivers in the province¹. This has been corroborated by our own members, industry associations, and government reports. Variances in driver wages are also prevalent across Ontario, with wage rates differing from region to region for doing largely the same work.

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In addition, there is very little job security in the school transportation industry. Drivers working for a specific operator may end up being unemployed if the operator should lose a contract or if a contract does not get renewed (contracts typically run between three to five years). In fact, we have seen how operators often use the threat of not getting contracts renewed as a way to deter drivers from unionizing to improve their working conditions. Similarly, unionized drivers may lose gains made in collective bargaining if a contract should flip to a new operator.

Furthermore, school bus drivers must juggle several roles and responsibilities simultaneously, resulting in increased job stress. This includes: making sure buses are well-maintained, ensuring the safety of

¹ According the 2014 data released by the Ontario Ministry of Transportation and the Canadian Urban Transit Association, the average top wage for transit operators was \$25.33/hr.
<http://www.ontla.on.ca/library/repository/ser/74971/2014.pdf>

students and that younger children get off at the right stop, helping children with special needs receive attention they require, driving in adverse weather conditions or high traffic situations, and dealing with verbal and sometimes physical harassment from students.

Many new drivers, upon realizing the true (and stressful) nature of the job, quit shortly after being hired, resulting in higher than normal turnover rates. In their 2015 report, the Ontario Auditor-General reported turnover rates at three consortia in 2013-14 to range from 14% to 27% -- which is larger than the overall turnover rate in Ontario transportation industry of nearly 9% in 2014². As such, operators often are left scrambling to find qualified and experienced drivers.

Student Transportation Funding

Contributing to the overall problems facing student transportation has been the decline of provincial investment in student transportation services. On paper, the **Student Transportation Grant** (which falls under the larger **Grants for Student Needs** education funding envelope dispersed by the Ontario Ministry of Education) amount has seen an increase of 46% from 2002-03 to the 2017-18 school year – from \$629.3M to \$919.6M³. However, when these funding amounts are adjusted for inflation, we find that overall student transportation funding has declined.

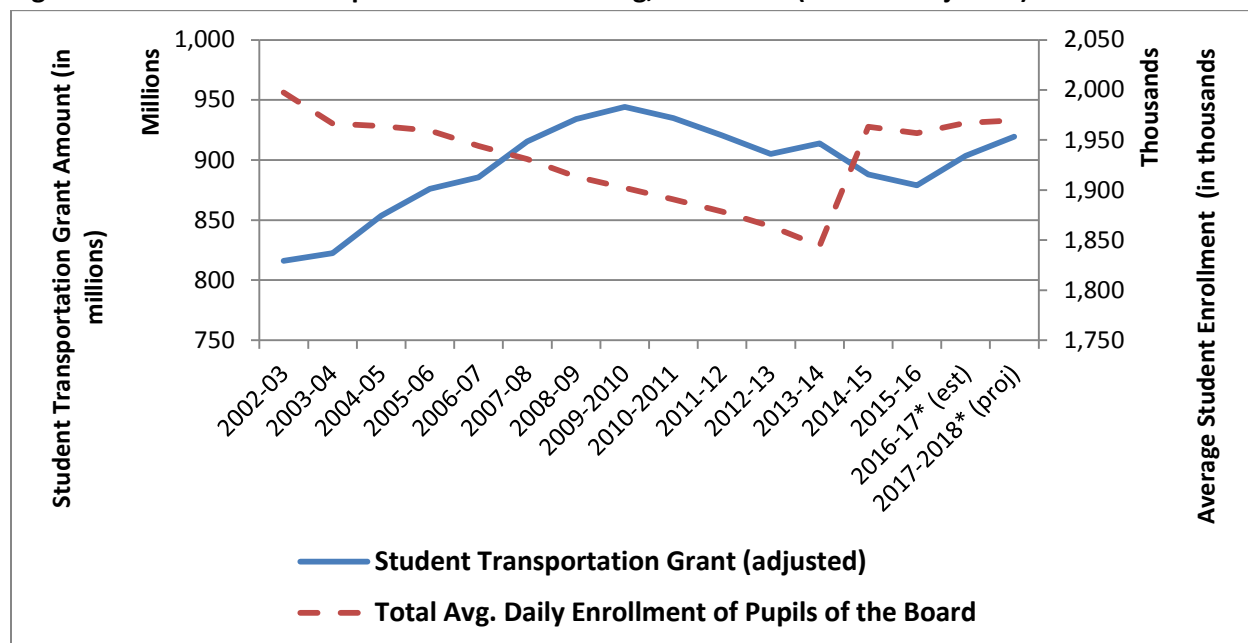
The following graph (Figure 1) tracks the total provincial Student Transportation Grant amount between 2002-03 to the present (adjusted for inflation), and compares it against the total average daily enrollment of students in Ontario (at both the elementary school and secondary school levels). We see that during this time period, the transportation grant amount steadily increased between 2002-03 and 2009-10 – despite an overall decline in student enrollment⁴ – before starting a downward trend. While we could attribute the decrease in transportation funding as a response to the decline in student enrollment, it is important to note that in 2009, the Ministry began piloting the RFP process for school bus services, which may also be a contributing factor (full transition to the RFP system was required by the Ministry to be implemented in 2013-14).

² The exit rate of Ontario workers in the warehousing and transportation industry in 2013 was 9.1% and 8.9% in 2014. Source: Statistics Canada. Table 527-0007 - Business dynamics measures, by North American Industry Classification System (NAICS), provinces and the territories, annual (number unless otherwise noted), CANSIM (database). (accessed:2018)

³ The Ministry of Education provides only a projected funding estimate for the 2017-18 school year

⁴ Student enrollment rates experienced a spike during the 2013-14 school years. The Ministry explains how this spike is a result of the shifting and integration of full-day kindergarten funding into the Grants for Student Needs (GSN) stream

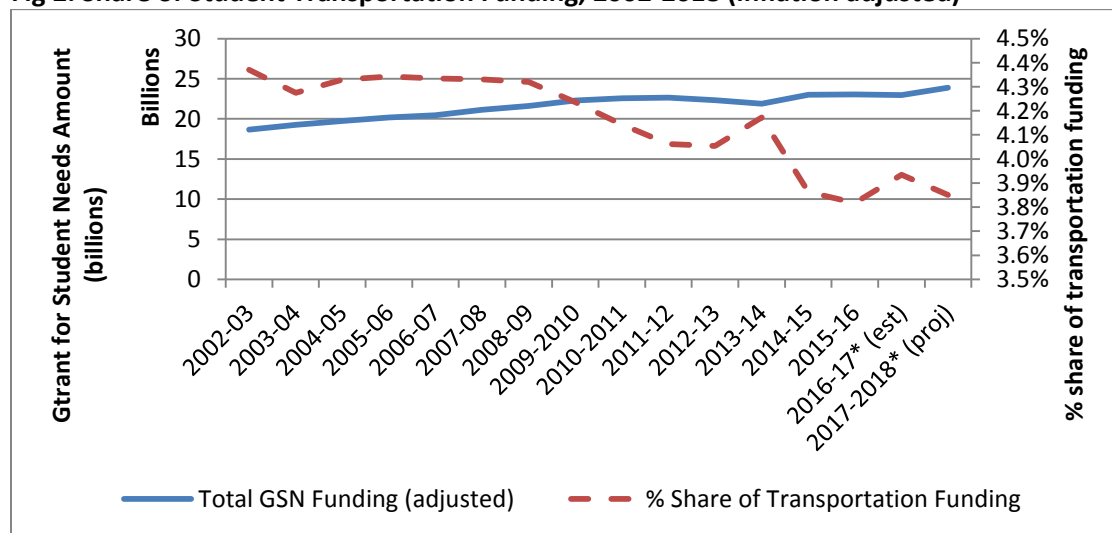
Fig. 1 Ontario Student Transportation Grant Funding, 2002-2018 (inflation adjusted)



Source: Ontario Ministry of Education

As seen in Figure 2, the share of funding for student transportation in relation to the GSN grant has been decreasing – from 4.4% in 2002-03 to 3.8% in 2015-16. While it remained steady at 4.3% for several consecutive years in the early 2000s, declines started occurring after 2008-09 (again, close to the time that the Province began rolling out the RFP process). For the 2017-18 year, it is projected to remain at 3.9%.

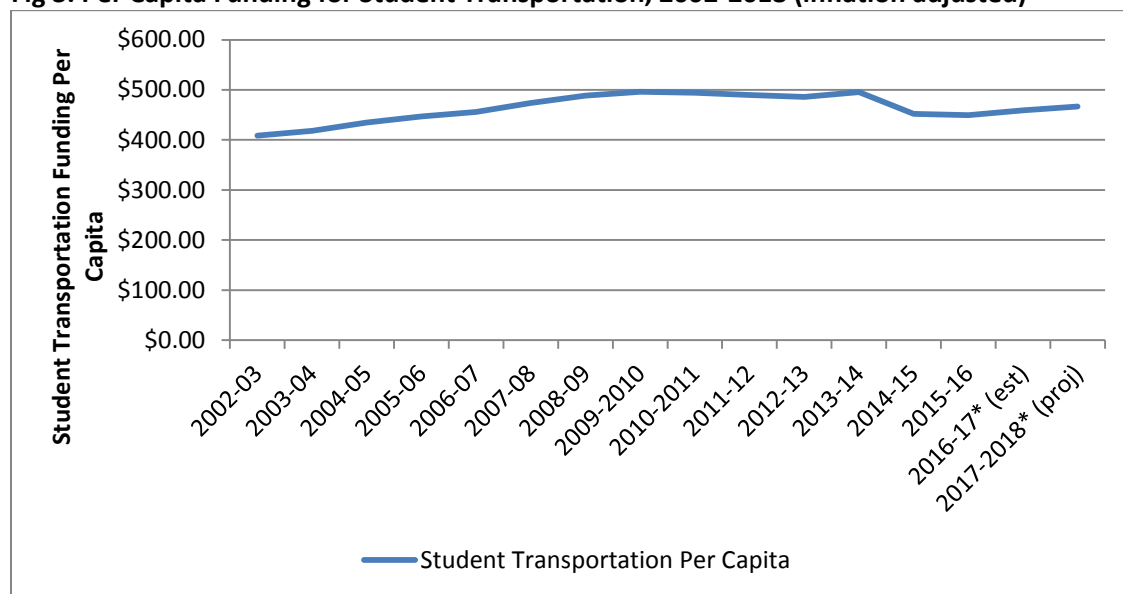
Fig 2. Share of Student Transportation Funding, 2002-2018 (inflation adjusted)



Source: Ontario Ministry of Education

In Figure 3, we find that per capita funding (adjusted for inflation) for student transportation has seen only a slight increase over a seven year period, rising from \$409 in 2002-03, to a high of \$496 in 2009-10. This was followed by several years of funding flat lining following the move to the RFP process, as well as a slight decrease. The Ministry's projected per capita amount for 2017-18 is slated to be almost \$467.

Fig 3. Per Capita Funding for Student Transportation, 2002-2018 (inflation adjusted)



Source: Ontario Ministry of Education

It is generally assumed that all the funding provided by the Ministry of Education to school boards are use specifically to fund school bus transportation services in their specific areas. However, as noted by the Ontario Auditor-General in their 2015 Annual Report, school boards are free to use any portion of the transportation grant for non-transportation related expenses, such as textbooks, school office supplies, and administrative costs. As such, it is difficult to ascertain (through publicly available information) how much of the total transportation funding is actually going directly towards providing student transportation at every school board.

Unifor Recommendations

Unifor would like to put forth the following recommendations based on the four pillars outlined in the *New Vision for Student Transportation* discussion paper.

Responsiveness

Service levels are directly affected by the inability for operators to attract and retain trained and experienced bus drivers. As such, any solutions to improve service efficacy must consists of measures that improve wages and working conditions for drivers, which will in turn improve recruitment and retention and end the cycle of ongoing driver shortages. As such Unifor proposes the following key recommendations:

Recommendation 1: Establish a School Bus Industry Council, consisting of government officials, education staff, school bus operators, industry associations, and labour unions to meet and regularly review issues facing the school bus transportation industry and develop collaborative policy solutions

There have been a number attempts over the years to review issues facing the school bus transportation industry, either through formal consultation processes and policy reviews or individual stakeholder meetings with Ministry staff. It is in our view that these have resulted in only short-term remedies that have failed to deliver long-term solutions. We strongly recommend that a formal industry working group be established, consisting of key transportations stakeholders (i.e. government officials, education staff, school bus operators, industry associations, and labour unions) that meet regularly to review issues facing the industry so that a collaborative approach can be taken to develop a fair and sustainable student transportation system.

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Issues this group can discuss can include: reviewing the school bus transportation funding formula; establish common work standards and practices for drivers; recruitment, retention and training strategies; establish a fair wage base; yearly evaluation of student transportation policies, and identification of common challenges and best industry practices. We feel this would work to foster better relationships and partnership between all stakeholders involved. The province of Quebec has convened similar (albeit ad hoc) working student transportation groups that have worked together to formulate several policy recommendations for the provincial government to consider⁵.

Recommendation 2: Increase funding to the Student Transportation Grant and review and modernize the transportation funding formula to better reflect actual transportation costs

Our analysis of provincial school bus transportation funding has revealed that, despite yearly increases, overall inflation-adjusted money dedicated to support student transportation has remained flat over a ten-year period. The problem is that the current transportation funding formula is calculated based on a limited number of factors, such as fuel costs, student enrollment figures and cost-update adjustments. It fails to take into account other transportation-related costs, such as vehicle maintenance, insurance,

⁵ Please see the following reports emerging from the Quebec Student Transportation Working Group : [Rapport sur les travaux du Comité mixte sur le transport scolaire](#) (2012) & [Comité d'évaluation de l'emploi de conductrice ou conducteur de véhicule de transport scolaire](#) (2015).

driver recruitment, training and benefits, and other costs operators and drivers are faced with⁶. As a result, boards, consortia, and operators are forced to stretch limited resources.

The Ontario Auditor-General has also flagged how the funding formula was in dire need of updating, stating that the current model was not based on student need, but rather on each school board's 1997 spending levels with annual adjustments. Further, the Auditor-General noted that transportation costs were not taking into account factors such as: geography, availability of public transit, and the number of student requiring transportation services.

This is clearly an outdated model that requires substantial revision. A review of the funding formula must accurately reflect all the costs related to providing student transportation services. Unifor recommends that the Ministry of Education boost funding to the Student Transportation Grant and that the funding formula be carefully reviewed (preferably via an established Industry Council) and modernized to better reflect actual transportation costs in the current context.

Recommendation 3: Implement a Fair Wage Policy for School Bus Drivers

The highly competitive nature of student transportation procurement requires private operators to find ways to reduce costs to be successfully selected. Since labour costs make up the bulk of school bus transportation costs⁷, it is fair to assume driver wages are the first area in which many companies look to make cuts. In order to recruit and retain experienced and qualified drivers, wages must be increased to reflect the many critical and overlapping roles and responsibilities that drivers take on during the course of the job. Wages must also be protected from the downward pressures that are inherent in the RFP process.

In order to recruit and retain experienced and qualified drivers, wages must be increased to reflect the many critical and overlapping roles and responsibilities that drivers take on during the course of the job.

We recommend the province institute a Fair Wage Policy that creates an adequate base wage for drivers and that this wage rate is applied to all future RFPs. The exact amount for this wage rate can be determined through the establishment of an industry working group⁸ (see recommendation 1). In addition, this wage would be reviewed on an annual basis and adjusted for inflation, to make certain that wages do not fall below a minimum threshold. In the past, Unifor has called for the removal of wages from the RFP process; however, we feel that instituting a Fair Wage policy would serve as an effective way to reduce province-wide discrepancies in wages and standardize and protect further erosion of driver wages from the competitive procurement process – particularly in cases when contracts get flipped to new operators.

⁶ Unifor school bus driver members, for example, have begun to raise the critical issue of needing to secure their own parking spaces for school vehicles during non-working hours.

⁷ The Ontario School Bus Association has estimated that driver wages account for nearly 40% of total operating costs. This is followed by capital costs and fuel costs, both estimated to be at 18%:

http://www.osba.on.ca/files/Letter_to_the_Minister_-_Response_to_Drummond_Report_-_feb_24-12.pdf

⁸ In Quebec, for example, the industry working group recommended the establishment of a 2015 base wage for drivers to be set at \$19.14/hr. Indexed to inflation, this rate would be approximately \$20.02/hr today.

Implementing such a policy would not be something new. The Ontario government has already adopted a Fair Wage Policy that has long been in place for government workers in the building cleaning and security services, and building trades and construction industry to ensure that wages and working conditions are protected when contracts are up for open competition. Expanding the existing provincial Fair Wage Policy to the broader public sector to include school boards, would afford school bus drivers greater wage and workplace protections.

Further, the Ontario government has also adopted wage enhancements for other professional workers that have experienced chronically low-wages, such as Personal Support Workers (PSWs) and Early Childhood Educators (ECEs)⁹.

Recommendation 4: Establish a Provincial Office to monitor wage policy and labour standards in the student transportation sector

In order for a Fair Wage Policy to be effective, there must be a dedicated Office that is created that will provide oversight as to how the policy is being implemented and that works to closely monitor and evaluate labour standards in the industry¹⁰. We recommend that such an Office be established, either through the Ministry of Education or the Ministry of Labour, and that is tasked with: reviewing and ensuring that open RFPs and contracts adhere to provincial fair wage policies; investigating complaints regarding failure of private operators to pay drivers required wages and for all hours worked; monitor and evaluate industry-wide labour standards, and report on incidences of non-compliance. To ensure such an Office has the ability to function to effectively, we recommend they are provided with enforcement powers so that issues faced by drivers can be quickly investigated and promptly resolved.

Recommendation 5: Ensure school boards use funding allocated in the Student Transportation Grant solely for transportation related costs

We recommend that the Ministry of Education end the current practice which allows for school boards to use Student Transportation Grant funding for non-transportation related expenses. These funds have been earmarked for a specific purpose and we need to ensure that all funding be directed towards supporting our student transportation system. We recommend that the Ministry boost funding in other education areas/grants so as to not force boards to make cuts in other spending areas.

Recommendation 6: The Ministry of Education should conduct a thorough independent third-party cost-benefit analysis of the Request-for-Proposal (RFP) system

Unifor has previously called on the provincial government to undertake an independent review of the RFP process, which the province initiated in 2014. This review (The Student Transportation Competitive

⁹ Eligible PSWs saw their base wage rise to \$16.50 as of April 1, 2016, while eligible ECEs with a base wage of less than \$26.68/hr in 2017 were granted an increase of up to \$2 per hour, plus 17.5 per cent benefits.

¹⁰ The City of Toronto, for example, has Fair Wage Office that monitors and investigates all contracts awarded with the City of Toronto to ensure workers are paid fair wages, workplace standards are met, and that workers are being treated fairly. They also have investigative and enforcement powers to ensure employers comply with the City's Fair Wage Policy.

Procurement Review Report) resulted in a series of recommendations being tabled on how to standardize the RFP process at the board and consortia levels. Lacking in the final report, however, was any thorough examination on the impacts of the RFP process on driver wages, working conditions, levels of service, or how much exactly the government has saved by transitioning student transportation to a competitive bidding model. This also includes costs associated with supporting several administrative bodies currently involved in student transportation (i.e. Ministry of Education, Ministry of Transportation, school boards, consortia, and private operators).

We recommend the Ministry of Education undertake an independent cost-benefit analysis of the current RFP system, since its implementation, to examine and evaluate the merits of the current model against several key indicators, such as: driver wages, working conditions, service levels, and safety. Further, this study can also compare how capital (i.e. buses and yards) and fuel costs have been impacted by the RFP model and whether there are merits to centralizing bus fleet ownership at the provincial level to save on costs.

Recommendation 7: Establish a dedicated fund to support ongoing driver recruitment and training and expand Ontario Works skills training programs at the municipal level to assist in paid driver training courses

The Ministry of Education's December 2017 announcement of a \$60 million fund to help support school bus driver recruitment and retention has been welcomed by many; however, this is only a short-term solution for a long-term problem. We have heard directly from bus operators how driver recruitment and training has proved to be a costly expense due to the high rate of driver turnover. In order to offset training costs and ensure that more dollars are spent by operators towards driver wages, we recommend the Ministry of Education create a permanent funding envelope to specifically support driver recruitment and training.

Further, we encourage the Ministry of Education to work with the Ministry of Community and Social Services to expand the Ontario Works Skills Training program to help support paid driver training for social assistance recipients who are interested in entering the profession. Currently in the City of Toronto, for example, individuals on Ontario Works may qualify to participate in a paid five-week bus driver training program through the City's Employment and Social Services division. We feel that such a program can be replicated in other jurisdictions across the province where school bus driver shortages are particularly acute.

Recommendation 8: The Ministry of Education work with Federal counterparts to ensure access to Employment Insurance (E.I.) benefits for school bus drivers

Many school bus drivers depend on the income received from their work to make ends meet. As such, the loss of this income during the summer months when schools are shut down puts drivers in a precarious financial situation. Despite making regular contributions to the Employment Insurance (E.I.) program, drivers find they are largely ineligible to receive benefits due to not accumulating the necessary hours to qualify for benefits. Unifor has been working with private bus operators to make sure

all paid time worked by drivers is E.I. accredited. However, the high threshold of work hours needed to apply remains a challenge. Without this financial safety net, drivers are left with little choice but to seek other supplementary employment during school closures, or find other means to make ends meet while they are unemployed (or, as we have seen, leave the bus driving profession altogether).

Currently, under the rules governing E.I. eligibility, there are special provisions in place for casual and substitute teachers during non-teaching periods to access E.I. benefits. Unifor recommends that the Ministry of Education work with the Federal Minister of Families, Children, and Social Development to review E.I. eligibility criteria and to put into place special provisions in order to facilitate access to benefits for school bus drivers during school closures. We believe this would create a strong incentive for drivers to remain at their jobs and reduce driver turnover.

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Recommendation 9: The Ministry of Education work with the Ministry of Labour to extend successorship rights to unionized school bus drivers under the Ontario Labour Relations Act

Ontario school bus drivers that are represented by a union enjoy greater protections and benefits than their non-union counterparts. However, if a school bus operator should lose a contract to another company, drivers are at risk of not only job loss, but losing all protections successfully negotiated in their collective bargaining agreement.

During recent government consultations around the *Ontario Changing Workplaces Review*, Unifor called for the extension of successorship rights to all sectors where contract flipping was prevalent in order to reduce precarious employment and maintain decent conditions for unionized workers. While the subsequent *Fair Workplaces, Better Jobs Act (Bill-148)* extended successor rights only to the retendering of building services contracts (e.g. cleaning, food services, and security), it did allow for the government to apply successor rights, by regulation, to other contracted services that receive public funds. We ask that the Ministry of Education work with the Ministry of Labour to utilize this provision to extend successorship rights to the school bus sector to better protect unionized drivers.

Recommendation 10: The Ministry of Education work with the Federal counterparts to amend the Canadian Labour Code to ensure proper wage protections for unionized workers falling under Federal jurisdiction

Currently, unionized school bus drivers fall within a mix of both provincial and federal jurisdictions, which is established during the union certification process. Typically, a federal designation is a result of buses that must traverse across provincial lines in the course of their operations, such as during charter runs and field trips. Drivers falling under the Federal Labour Code are exempt from some certain clauses of the Code that protect their wages when a contract between a school bus operator and

board/consortium expires. This leaves unionized drivers at risk of not only job loss, but losing wage gains and protections made in their bargained collective agreements.

Section 47.3 of the Labour Code ("*Successive Contracts for Services*") provides wage protections under the "*Equal Remuneration*" portion of the clause; however, it is only applicable to specific professions listed under the Code. We request that the Ministry of Education lobby the Federal Minister of Employment, Workforce Development and Labour to amend the Canada Labour Code to ensure that school bus drivers falling under federal jurisdiction are included in the full list of occupations that the Labour Code applies to. This will help to ensure that unionized drivers receive the same remuneration if a school bus contract transfers to another operator.

Recommendation 11: Conduct a 'best practices' analysis of how other Canadian, U.S., and international jurisdictions procure and manage student transportation services

There is much we can collectively learn on how other jurisdictions, both inside and outside of Canada, manage their student transportation services. We recommend that the Ministry of Education commission and publicly release an independent study examining how other Canadian and international jurisdictions fund, procure, and administer their student transportation services and develop a list of policies and/or practices that can be replicated in Ontario. This could also include examining strategies implemented by other jurisdictions to enhance driver recruitment and retention to reduce shortages and turnover.

Equity

The goal of student transportation is to safely transport all students who require transportation services from home to school and back. Yet, one of the Auditor-General's main findings in their 2015 report was that school busing services were not available on an equal basis to Ontario students. This is due in part to the province lacking a common eligibility standard for busing, which has resulted in boards being able to determine which groups of students they provide transportation services for.

Recommendation 12: Unifor calls on the Ministry of Education to implement the Auditor-General's 2015 recommendations and work with school boards in setting common standards on eligibility for transportation services to promote greater consistency of service-levels across the Province.

The Ontario Auditor-General's finding of substantial discrepancies in transportation eligibility criteria between consortia, school boards within the same consortium, and even among schools under the same board is particularly disconcerting. This is resulting in some students not being able to receive any student transportation services at all¹¹. We call on the Ministry of Education to work with school boards

¹¹ The Auditor-General, for example, found that at three school boards, no transportation services were available for secondary students who do not have special needs.

to develop a common set of eligibility criteria to eliminate these variances and ensure student transportation services are equally available for all students in Ontario who require them.

Safety and well-being

Safety for both students and drivers is of paramount concern. We have frequently highlighted how the RFP model results in operators forced to cut costs in order to be successful contenders for school route contracts. Unfortunately, bus maintenance and repairs are often sacrificed in order to curb costs. We have heard from our members, for example, how drivers are forced to operate buses in the winter with broken heating systems or how repeated requests for bus maintenance and repairs go unanswered.

We have frequently highlighted how the RFP model results in operators forced to cut costs in order to be successful contenders for school route contracts.

In the Ontario Auditor-General's 2015 report, several recommendations were put forth around bus safety that was directed both to the Ministry of Education, the Ministry of Transportation, and school board transportation consortia. In their 2017 report, the Auditor-General conducted a follow-up¹² to determine the status of their list of recommendations. Unfortunately, in the two-year span between reports, the Auditor-General revealed that only less than half (45%) of the recommendations were implement or in the process of being implemented.

Recommendation 13: Unifor calls on the Ministry of Education to work with the Ministry of Transportation and the school board consortia to implement the remaining 2015 Auditor-General recommendations around school bus safety.

In particular, Unifor supports the AG's call for the Ministry of Transportation to:

- Ensure that safety infractions are updated in the Commercial Vehicle Operators' Registration Program (CVOR) in a timely manner and that these are reflected in the bus operator's safety rating for the full 24 months from the time the infraction is input into the system;
- Ensure that information in the CVOR is easy to interpret and provides safety information on local terminals of school bus operators;
- Changing the threshold that triggers a facility audit for school bus operators;
- Obtain evidence that violations or infractions noted during school bus inspections are rectified in a time manner by a school bus operator
- Devise a strategy that enables the Ministry of Transportation to conduct risk-based reviews of Motor Vehicle Inspection Stations, especially those that are run by school bus operators licensed to inspect their own school vehicles;
- Require Motor Vehicle Inspection Stations to submit its results of annual and semi-annual inspections for tracking in situations where concerns are identified, as confirmation that its school vehicles have undergone the necessary mechanical inspection.

¹² http://www.auditor.on.ca/en/content/annualreports/arreports/en17/v2_113en17.pdf

Finally, we also support the recommendation that the Ministry of Education, in collaboration with school boards and consortia, develop policies for the safe transportation of students and for dealing with behavioural issues on the bus as well as implementing improved measures on tracking behavioural incidences.

Recommendation 14: Provide funding to support the position of trained school bus assistants to accompany drivers on routes

We have heard from many of our members on the stressful nature of school bus driving work. To help relieve some of the many duties drivers must take on and to increase overall student safety, we recommend the Ministry of Education provide funds to support the position of trained adult school bus assistants to accompany drivers on their daily routes. While some routes may have designated school bus monitors on-board, often times these positions are held by volunteer students themselves. We believe that such a role can only be adequately performed by a person who has been specifically trained for the position.

School bus assistants would be able to assist drivers in: helping load and unload younger children from the bus, getting them properly seated, and ensuring younger students are dropped off with a trusted parent or guardian; assisting students with special needs; helping guide relief drivers who are new to a route, and help monitor and report student disciplinary issues. In addition, such drivers would be fully trained in CPR and First Aid and assist in any emergency evacuation procedures. Paid school bus assistant positions already exist in many districts in the U.S. and their models could be replicated in Ontario.

While some routes may have designated school bus monitors on-board, often times these positions are held by volunteer students themselves. We believe that such a role can only be adequately performed by a person who has been specifically trained for the position.

Accountability

Recommendation 15: Improve accountability and transparency surrounding school transportation contracts – especially at the school board and consortia levels

To help answer whether student transportation services are being provided in an efficient and effective manner, requires information as to the nature of operator contracts and how public money is being allocated. However, access to information on contracts awarded by consortiums to private operators remains elusive. This is despite a 2014 ruling by Ontario's Information and Privacy Commissioner stating that such information should be made accessible since consortia were deemed not to be independent entities, but rather extensions of their respective school boards¹³.

Confusion remains as to which organization actually holds contract information. Unifor has submitted several Freedom of Information requests to receive information on school transportation contracts, but to date, have received only partial information, a redacted contract, or outright refusals to our requests

¹³ <https://www.ipc.on.ca/wp-content/uploads/Resources/ar-2014-e.pdf>

based on 'protection of third party information and economic interests' clauses of the *Municipal Freedom of Information and Protection of Privacy Act* . We find the high level of secrecy surrounding these contracts and how public money is being used very alarming. Even on many of student transportation consortia websites there is often little (if any) detailed information on how transportation dollars are being allocated.

To demonstrate, we looked at a sample of 12 consortia websites to assess how much public information on school contracts or financial information has been made available. The following table reveals how, of the 12 consortia selected, less than half published an annual report of consortium activities while only 2 out of the 12 provided a detailed financial breakdown of how provincial transportation dollars are being spent.

Consortium	Annual Report Available online	Year of recent annual report	Information on Contracted Service Providers	Detailed Financial Breakdown on how Provincial Transportation Dollars are Spent	Website
Durham Student Transportation Services	Y	2014-15	Y	N	dsts.on.ca/information
Simcoe County Student Transportation Consortium	N	-	Y	N	main.simcoecountyschoolbus.ca
Student Transportation of Eastern Ontario	Y	2015-16	Y	N	steo.ca
Sudbury Student Services Consortium	N	-	Y	N	businfo.ca
Niagara Student Transportation Services	N	-	Y	N	nsts.ca
Student Transportation of Peel Region	N	-	Y	N	stopr.ca
Toronto Student Transportation Group	Y	2015-16	Y	Y	torontoschoolbus.org
Wellington-Dufferin Student Transportation Services	Y	2015-16	Y	N	stwdsts.ca

Windsor - Essex Student Transportation Services	N	-	Y	N	buskids.ca
Tri-Board Student Transportation Services	N	-	Y	N	triboard.ca
Halton Student Transportation Services	Y	2015-16	N	Y	haltonbus.ca
Student Transportation Services of York Region	N	-	Y	N	net.schoolbuscity.com

Accountability and transparency in the school transportation industry has been an ongoing problem. We have seen this in 2008 when the Ontario government introduced a \$10 million school bus driver wage enhancement fund that was intended to help boost driver wages. However, drivers did not receive any increase to their wages and, to this day, the province is unable to account of the whereabouts of this \$10 million dollars despite numerous inquiries.

In light of our experiences thus far, Unifor recommends the Ministry instruct school boards and consortia to increase transparency of school transportation funding by disclosing both how money is being spent at the consortia and school board levels, including amounts paid to contracted private school bus operator companies.

Technology

The Ministry's discussion paper also requested feedback on how current and future technological innovations could shape how students get to and from school.

Recommendation 16: The application of any technology for use in school buses should be thoroughly reviewed and consulted with key stakeholders, including labour, before implementation. Further, the use of any ride-sharing apps or driverless technology for student transportation should be strictly prohibited.

Unifor does not oppose the use of technology that assists our bus drivers to make their route runs easier, safer, and more efficient. However, we strongly oppose the use of any technology that would displace trained and qualified bus drivers in favour of ride-sharing type services, such as Uber or Lyft, apps that allow drivers to be rated, or the use of driverless technology. Driving children to school must be performed by licensed professionals who must not only undergo substantial training, but must also pass mandatory vulnerable sector background checks, CPR and First Aid training, as well as knowledge on how to perform regular vehicle inspections to ensure the safety of students and drivers. Companies such as Uber or Lyft do not provide requirements on any of these areas, placing students at unnecessary risk of harm.

Conclusion

The school bus industry faces significant challenges and it is our desire to ensure that conditions are improved for drivers, students, parents, and our communities. It is our hopes that through this consultation process, swift and meaningful steps will be taken that will allow us to build a stronger, safer, and more stable student transportation industry. We would be happy to follow-up with you to discuss in further detail any or all of our recommendations.

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