



Your ref :

Our ref :

20 October 2025

Ms Hanyu Liu

[REDACTED]

Dear Ms Liu

### **COMPLAINT – NON-STANDARD CHILD RESTRAINT USE**

I refer to your email to the Ombudsman dated 7 August 2025, in which you requested a review of the circumstances surrounding the use of non-standard child restraints by your sons, [REDACTED], including a review of the procedures for their approval and ongoing management. The Ombudsman's Office has requested that the Public Transport Authority (PTA) respond to you directly on this matter.

Following receipt of your complaint, School Bus Services (SBS) conducted a review of the circumstances involving your children. This included an examination of relevant records, internal procedures, and the Student Transport Assistance Policy (STAP).

Records indicate that your children commenced using the 'Orange' school bus service on 1 February 2022. Within the first few weeks, safety concerns were raised due to frequent removal of seat belts, running in the aisles, and the need to stop the bus to manage these behaviours. These disruptions affected arrival times and impacted other schools serviced by the route. As a result, your children were suspended from the service, as outlined in the email you received dated 10 February 2022.

Documentation confirms that Bus [REDACTED] staff were working with [REDACTED] Primary School Education Support Centre ([REDACTED] PS ESC) to implement strategies such as booster seats and a social story to address their behaviour. You were informed that Bus [REDACTED] and the school were collaborating to find a solution. In an email between yourself and SBS shows that the use of a non-standard child restraint was progressed including the involvement of your NDIS planner.

Under the January 2022 version of the STAP, SBS is required to approve the use of control devices on services, consult with relevant parties, and review their continued use. At the time, the Control Device Approval Form – Safer Travel was used to document the rationale for the restraint. This form was signed by SBS, the school principal, school psychologist, and yourself. SBS's role in approving control devices is to ensure awareness across services, confirm safety procedures are in place, and inform School Bus Operators that such devices cannot be used without formal approval.

SBS facilitates this process and supports families and schools, including guidance on where control devices may be purchased. However, SBS does not assess the suitability of a control device for a student, this must be determined by qualified health professionals. SBS is not funded to provide these assessments or to supply the devices.

Your children resumed travel on the school bus service on 17 October 2022. From that time through 2023, no incidents were reported. While SBS did not follow-up on the use of the restraint, it is common for School Bus Operators to communicate directly with families and schools, notifying SBS only when necessary. The absence of communication suggests that your children were travelling without incident while using a harness.

In 2024, the service provider changed from Bus [REDACTED] to [REDACTED] Bus [REDACTED]. [REDACTED] Bus [REDACTED] reported that at the start of 2024, they had received advice from you that the behaviour of your children had improved and no longer required harnesses. Without the knowledge of SBS, the removal of the harnesses was agreed upon between you and the bus aide. Your children did not use harnesses for the remainder of the year.

In 2025, no transport issues were reported to SBS. It was not until you, or your husband, contacted SBS that we became aware your children were again being placed in harnesses. You requested that [REDACTED] no longer be placed in a harness due to improved behaviour. The decision to use the restraints was made by a new bus driver to the service who, after observing certain behaviours and reviewing the passenger list, noted that harness use had been previously approved. Your email correspondence provided SBS with historical context regarding the use and transition of harnesses.

As previously stated, it is not uncommon for School Bus Operators to work directly with families, schools, and other stakeholders to support safe and successful travel. This includes implementing strategies and providing feedback on their effectiveness. It appears that the bus operator supported your request to transition out of harness use. However, there was a breakdown in communication between SBS and the operator regarding monitoring progress and confirming the ongoing need for the control device. Once the device was no longer required, it should have been removed from the passenger list comments, and a new request submitted, if a transition plan was being implemented.

In July 2025, Section 7.5 of the STAP, *Safety Control Devices*, was updated. The revised procedure, available on the School Buses website, now requires an Advice to Parent Form to be completed by a qualified prescriber (e.g. medical practitioner, occupational therapist, psychologist, physiotherapist, rehabilitation engineer, or biomedical engineer) for the use of restraints. In some cases, a valid medical certificate may also be required. The updated process includes regular reviews, with intervals determined by individual circumstances.

SBS and School Bus Operators will continue to work with families to implement strategies appropriate to the school bus environment. However, assessment and development of transition plans involving non-standard child restraints must be undertaken by health professionals. It is the responsibility of families to initiate this process where these devices may be required to maintain access to the school bus service. The PTA is not funded or responsible for providing professional assessments or supplying non-standard child restraints.

SBS has begun communicating these updated requirements to families to ensure valid documentation is in place for the 2026 school year. Where school bus transport is not feasible, families may be eligible for a conveyance allowance to help offset costs incurred in transporting eligible students to their nearest appropriate school.

Thank you for taking the time and effort to raise this matter. Your concerns have been instrumental in highlighting the critical importance of clear and consistent communication among all stakeholders when considering the use of non-standard child restraints in student transport services.

If you wish to discuss this matter further, please contact [REDACTED], Manager School Bus Services on 9326 2706 or email [\[REDACTED\]@pta.wa.gov.au](mailto:[REDACTED]@pta.wa.gov.au)

Yours sincerely



Peter Jones

**EXECUTIVE DIRECTOR  
TRANSPERTH SYSTEM, REGIONAL AND SCHOOL BUS SERVICES**