

## Complaint Form

Use this form to make a complaint about a State Government department or agency, a local government or a university.

For information on what you can and cannot complain about go to '[How to make a complaint](#)' or contact us on [\(08\) 9220 7555](#) or [1800 117 000](#) (free from landlines) for assistance.

The information you provide will only be used for the purpose of assessing and investigating your complaint.

Entries marked with \* must be completed.

### Who your complaint is about

What State Government department or agency, local government or university are you complaining about?

Public Transport Authority School Bus Services

### Your Contact Details

Please provide us with your contact details below. Please note that your name and address must be provided in order to submit your complaint.

Surname: \*

Liu

Given Name(s): \*

Hanyu

Title: Ms 

Other Title (please specify):

Pronouns: [she/her/hers](#) 

Your email address: \*

Helloluna520@gmail.com

Street / Postal Address: \*

Suburb: \*

State: WA 

Post Code: \*

Home Telephone:

Mobile Telephone:

## Representative's Contact Details

If you want someone to represent you regarding your complaint, please give us their contact details below.

Surname:

Given Name(s):

Title: [Select a title](#) 

Other Title (please specify):

Pronouns: [Select your pronouns](#) 

Email address:

Street/Postal Address:

Suburb:

State: [select a state](#) 

Post Code:

Home Telephone:

Mobile Telephone:

## Do you require help to access our services?

Do you have an ongoing disability that means you require assistance to access our services?

Yes  No

If yes, please tell us how we can assist you:

Do you need a translator?

Yes  No  If yes, please tell us what language you require:

## How did you find out about the Ombudsman?

Please choose an option from the list below:

Referred by agency

Legal / other adviser

Community Group

Member of Parliament

Ombudsman Regional Visit

Ombudsman brochure

Ombudsman website

Friend / relative

Internet search

Phone book

TV

Radio

Newspaper

Other  please specify :

### **Tell us about your complaint**

**Tell us what you think has gone wrong and when it happened. If possible, provide us with the names of the people involved. \***

Dear Ombudsman,

I am writing to lodge a formal complaint against School Bus Services (SBS), a branch of the Public Transport Authority (PTA), regarding maladministration and negligence in the approval, implementation, and ongoing management of a restrictive practice (a safety harness) used on my two sons, [REDACTED] and [REDACTED], both students with Level [REDACTED] autism.

Background:

In 2022, SBS initiated and managed the approval and procurement process for a safety harness for my sons. At no point did my family independently select, purchase, or receive technical documentation for the device. Since its implementation, and despite repeated requests, SBS has failed to provide essential information or adhere to policy-mandated review processes.

Key Issues:

1. Failure to Maintain and Provide Records:

SBS has been unable or unwilling to provide any documentation regarding the original clinical prescription for the harness, in breach of its responsibility as the approving authority.

2. Failure to Adhere to Own Policy:

Section 6.5 of the SBS Student Transport Assistance Policy (May 2020) requires that all use of control devices be reviewed "no less than every three (3) months." SBS has admitted in writing that no such review or fade-out plan exists, instead placing this responsibility on the parent, which is a direct violation of both the spirit and letter of their own policy.

3. Unlawful Abdication of Responsibility:

In correspondence dated August 7, 2025, SBS Team Leader Ms. [REDACTED] stated that responsibility for the fade-out plan and for knowledge of the harness's make, model, and manual lies with the family. This represents an improper abdication of duty of care and oversight for a restrictive practice SBS approved and enforced.

4. Provision of Misleading Information:

The current position advanced by Ms. [REDACTED] directly contradicts written records from 2022 (see emails from Ms. [REDACTED]), where SBS staff clearly stated they were initiating and managing the harness approval process. The harness in question was procured and provided by SBS, not the family.

5. Impact on Rights and Wellbeing:

The lack of documentation, regular review, and institutional support has forced my family to use NDIS resources for issues that are the Department of Education/PTA's responsibility, has caused significant emotional distress, and has resulted in unnecessary, prolonged restraint of my children, compromising their safety and dignity.

Desired Outcome:

I respectfully request that the Ombudsman investigate this matter and recommend that SBS:

- Conduct a full audit of their records regarding my sons' cases.
- Develop and implement a formal, policy-compliant procedure for the assessment, management, and regular review of all restrictive practices, including a fade-out plan for my son, [REDACTED] with professional consultation funded by the Department of Education/PTA.
- Issue a formal clarification regarding their responsibilities, correcting the misinformation provided in recent correspondence.

Attachments:

1. Email correspondence with SBS (Feb 2025 - Aug 2025): Documenting all recent requests and responses regarding the harness.
2. Email correspondence with SBS (Feb 2022 - Aug 2022): Showing SBS initiated and managed the harness process.
3. Transport Assistance Approval Letters (Aug 12, 2022): Confirmation of my sons' status as eligible passengers.
4. Student Transport Assistance Policy and Operational Guidelines (May 2020), Section 6.5: Highlighting SBS's obligations regarding restrictive practices.

Thank you for your time and consideration. I look forward to your assistance in this serious matter.

Sincerely,  
Hanyu Liu

Have you made a complaint to the agency you are complaining about?\*

Yes  No

If yes, what happened and when did you contact them? If you can, please include the name of any person in the agency you have dealt with, and any agency reference.\*

Yes, I have made extensive and documented attempts to resolve this matter directly with the agency, School Bus Services (SBS), a branch of the Public Transport Authority (PTA).

Our Family ID, used throughout all agency correspondence, is: [REDACTED]

#### 1. Recent Contact and Agency Response (February – August 2025)

I initiated renewed attempts to resolve this matter in February 2025. My primary contacts were Mr. [REDACTED] (Contract Officer) and later his Team Leader, Ms. [REDACTED]

The issue concerned SBS's failure to provide documentation, safety information, and policy-mandated reviews or fade-out plans related to the restrictive harness used by my sons, [REDACTED] (both Level 1 autistic).

During March 2025, I submitted multiple clear and reasonable requests. On 29 July 2025, I sent a structured email outlining three specific questions:

- The documented origin or prescription of the harness
- The existence of a formal fade-out plan
- The make, model, and manual of the harness

I requested a response within 5 business days.

#### 2. Final Response and Breakdown (August 2025)

On 7 August 2025, Ms. [REDACTED] responded. In this email, SBS:

- Failed to answer the three critical questions directly
- Stated in writing that the responsibility for creating a fade-out plan lies entirely with the parent, contradicting SBS's own policy (Section 6.5, Student Transport Assistance Policy – May 2020)
- Provided factually incorrect information, claiming the family had procured the harness (when in fact SBS supplied it)

#### 3. Historical Background (2022)

Our original engagement with SBS on this issue occurred in 2022, led by Ms. [REDACTED] (then Contract Officer). That correspondence clearly shows SBS initiating and managing the harness process, including procurement—a position that directly contradicts their current stance.

---

#### Summary of "What Happened"

Despite repeated, well-documented efforts since February 2025, SBS has failed to act in good faith. The agency:

- Ignored direct and reasonable questions
- Provided misleading statements
- Contradicted its own historical records
- Adopted a position that violates its own written policy

As direct resolution has proven impossible, I am now seeking the Ombudsman's intervention.

**What do you think should be done to resolve the problem? \***

To resolve this matter, I believe both immediate individual redress and systemic corrective action are required, addressing the direct impact on my sons and the broader administrative failures within School Bus Services (SBS).

## 1. Immediate Redress for My Children

### • Development of a Formal, Policy-Compliant Fade-Out Plan

I request that SBS, in collaboration with my nominated Positive Behaviour Support (PBS) practitioner and my sons' school, be directed to develop a documented, evidence-based fade-out plan for the harness currently used on my son [REDACTED]

This plan must:

- Align with best practice in restrictive interventions;
- Be reviewed no less than every three months, in accordance with SBS policy (Section 6.5, Student Transport Assistance Policy);
- Be integrated into the existing school and transport arrangements to ensure safety and dignity.

### • Clarification of Funding Responsibility

I request a formal determination that the responsibility for governance, development, and funding of this transport-specific adjustment lies with the Public Transport Authority (PTA) or Department of Education, and not with the NDIS.

This intervention exists solely to enable access to education (transport), not to address broader developmental needs, and should therefore be funded and governed by the education/transport system, not disability support funds.

## 2. Systemic Remediation

### • Policy Review and Implementation Oversight

I request that the Ombudsman recommend SBS undertake a comprehensive review of its internal procedures for approving, managing, and reviewing restrictive practices. This should result in:

- Clear operational guidelines;
- Mandatory training for relevant staff (Contract Officers, Team Leaders, etc.);
- Mechanisms to ensure all control devices are subject to the required three-month review cycle.

### • Retraction of Misleading Information and Formal Apology

I request that SBS be directed to:

- Formally retract the incorrect statements made in the August 7, 2025 correspondence, particularly the claims that families are responsible for procuring the harness and creating the fade-out plan;
- Issue a written apology acknowledging the administrative failings, policy breaches, and the distress caused to my family by their actions and omissions.

### • Full Audit and Accountability of Records

I request that SBS be directed to:

- Conduct a transparent audit to locate the original clinical prescription and documentation relating to the harness approval in 2022;
- If no such records exist or have been lost, formally acknowledge this in writing and outline what steps will be taken to prevent similar failures in the future (e.g. document retention policy improvements, staff accountability measures, or system redesign).

## Conclusion:

My family has endured prolonged emotional and administrative stress due to SBS's failures to meet their obligations under their own policy. The lack of documentation, misattribution of responsibility, and absence of procedural safeguards represent serious administrative failures requiring both individual and systemic redress.

## Supporting documentation

If you want to send a relevant document, you can attach a document to this form or send it by post, email or fax: I am attaching a document(s) to this form

Send this file: [Choose File](#) School bus ha...ion 2022.pdf

Send this file: [Choose File](#) School bus ha...ion 2025.pdf

Send this file: [Choose File](#) [REDACTED]...May 2020.pdf

Do you need to send us more than three documents? Yes  No

If you need to attach more than three documents, please send your additional documents by email to [mail@ombudsman.wa.gov.au](mailto:mail@ombudsman.wa.gov.au) and tell us in your email that you have submitted a complaint online. I will be sending relevant documents that support my complaint by:

Post  Email  Fax

### Other information about you

By filling in this information, you will be helping us ensure our services are available to all of the Western Australian community. The personal information you provide is confidential to our office. Any information we release will only identify groups to analyse access by different members within the community. The analysis will not provide any information about individuals.

While we would appreciate your responses, you are not required to fill in this part of the form.

Date of birth:

#### Which gender do you identify as?

Male  Female  Non-binary  Prefer not to say

Which country were you born in?

#### Are you of Aboriginal or Torres Strait Islander origin?

No  Yes

#### What is the primary language spoken at home?

English

Indigenous Australian

Other  please specify:

#### Do you have an ongoing disability?

No  Yes

If yes, please indicate what your disability involves:

Sight

Speech

Hearing

Learning

Use of hands / arms

Use of feet / legs

Long term medical, physical or mental condition

Other

please specify:

### Submit your complaint

Before you click Submit:

- Please check that the details are correct before submitting your complaint.
- You will not receive a copy of your complaint after submission. If you would like a copy, before clicking Submit click [Print page](#)  (you can then use "Print to PDF" or "Save as PDF" to save a copy).
- If you have not provided mandatory information, you will receive an error message and can use the back button/arrow on your Internet Browser to return to this page.

To clear all information, click on the 'Reset' button.

**If you are satisfied with your submission, click on the 'Submit' button to send us your complaint.**

[Reset](#) [Submit](#)

