
WHITE PAPER
School Opening Hours and Traffic Congestion

Ministry for Education and Employment
August 2015

Overview

This White Paper seeks to initiate a process of consultation on whether schools and school operational logistics can help minimise traffic congestion through improved school transport services. It will have the following primary objectives:

- Review current arrangements for school opening hours in State and Non-State schools and their effect (if any) on traffic
- Assess and determine the causes and impact of traffic congestion resulting from school arrangements
- Recommend proposals to address these issues taking into account the provision of education services and the commitment of working parents

How to respond

In preparation for this White Paper a number of meetings with relevant stakeholders were held in the past months. Nonetheless, further feedback may be sent via email (dsrm.des@gov.mt) Feedback can be submitted in either English or Maltese by not later than 5th October 2015.

Feedback in the form of written documentation other than email will also be received at:

Ministry for Education and Employment,
Directorate for Educational Services, School Resources Department, Room 130,
Great Seige Road, Floriana.

Contact Details

Ministry for Education and Employment

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As we are a public authority all documents we hold, including documents related to this public consultation process, may be released following a request to us under the Freedom of Information Act (Chap. 496), unless such request may be subject of an exemption arising from the same Act.

1. Introduction

Traffic congestion is fast becoming a major concern for the Maltese Islands. Be it in the morning, afternoon or evening, our main arterial roads are frequently congested. Guus van de Schouw, policy analyst in the European Commission's Transport Directorate, has been quoted by attesting that the Maltese roads were perceived as the fifth worst in Europe during a round table conference on the impact and cost of traffic in Malta in January 2015. A study carried out by the University of Malta's Institute for Climate Change and Sustainable Development has found that Maltese drivers spend 52 hours in gridlock traffic every year. These findings highlight the negative impact of traffic problems in Malta on:

- The economy
- The environment
- Road traffic accidents
- Air and noise pollution
- The tourism industry
- Delays faced by commuters

The findings also make a compelling case for workable solutions within a short timeframe. The European Commission's Country Report Malta 2015:18 states:

"Significant traffic congestion and low efficiency in transport sector entail high environmental and economic costs. Compared to the EU average, urban peak-hour congestion in Malta constitutes a major problem".

The reasons behind traffic congestions can be many and varied. There is the notion that school opening hours contribute considerably to exacerbating the problem. Although this is clearly not the sole reason for such a complex issue, the Ministry for Education and Employment is contributing towards the matter by committing itself to launch a White Paper with the aim of generating a wide discussion and consultation process about the matter following Government's commitment in the Budget Speech in November 2014 and then implementing the feasible recommendations.

As per Budget Speech 2015:

"With the aim of reducing traffic congestion and within the framework of other measures to be announced in this budget, the Government will be launching a White Paper to initiate a process of consultation with regard to the transport of children and school opening hours"

With the aim of proposing a draft White Paper, the Ministry for Education and Employment set up a working group with the following terms of reference :

1. Review current arrangements for school opening hours in State and Non-State schools
2. Assess and determine the causes and impact of traffic congestion resulting from such school arrangements.
3. Recommend solutions to address these issues taking into account the provision of Education services and the commitment of working parents.

2. Working Group

The Ministry for Education and Employment appointed the following working group members to develop this White Paper.

- Ms Roslynn Vella, Ministry for Education and Employment representative
- Ms Maria Pace, Ministry for Education and Employment representative
- Ms Maria Ciappara, Ministry for Education and Employment representative
- Mr Kevin Zahra, Transport Malta representative
- Ms Audrey Testaferrata Denoto, Transport Malta representative

3. Consultative Stake Holders

The working group has held consultative meetings with the following stakeholders :

- i. Malta Association of Parents of State School Students (MAPSS)
- ii. MUT (Malta Union of Teachers)
- iii. School Transport Providers
- iv. Police Representatives (Traffic)
- v. Commissioner for Children
- vi. GWU (General Workers' Union)
- vii. Church Schools Representatives
- viii. MEA (Malta Employers' Association)
- ix. Independent Schools Association
- x. Education Leaders Council – State Schools

Among the salient issues mentioned in these meetings held with key stakeholders, the following points were highlighted:

1. Traffic congestion in various arterial roads on the island is caused by other factors besides school opening hours, namely, Malta being possibly the highest densely populated EU country, a very high ratio of cars to inhabitants, roads which are unfit in heavy rain, traffic accidents as well as their management and prolonged road works. This can be visibly experienced when schools are not open.
2. Traffic congestion is also the result of a considerable number of parents who for a variety of reasons opt to use their private cars to take their children to and from school instead of using transport organised by the school.
3. Traffic congestion could be alleviated if there are significant improvements in the efficiency and effectiveness of a public transport service.

4. Traffic congestion could possibly be alleviated if Church Schools administer and organise school transport centrally.
5. Traffic congestion may be alleviated if the State assumes the overall responsibility of the administration and organisation of all school transport, state and non state.
6. There could be improvements to traffic congestion if parents were to be incentivised by financial rebates or tax incentives to use school transport instead of private cars to drive their children to school. Further to this, safety issues when using school transport need to be factored in and considerations for onboard supervision are to be factored in.
7. There could be significant improvements to traffic congestion if organised transport were to be provided free of charge to all students in state primary and middle schools.
8. Students in state senior secondary schools could also be issued a special pass to be used on public transport.

This White Paper makes a number of strategic recommendations, which require:

1. A thorough, general rethinking of school transport organisation nationwide, encompassing all schools not only state schools - School transport should be considered as servicing localities and not individual schools. This is a process which needs a shared responsibility between government and the non-state sector.
2. A major overhaul in improving quality of school transport provision – careless driving, lack of on board supervision, lack of bus safety seatbelts and early morning pick up hours as well as late drop off afternoon hours are quality issues that need to be addressed.
3. Once quality issues mentioned in point 2 are addressed, effective communication strategies need to be implemented to encourage reluctant parents to use organised school transport instead of private transportation.
4. An improvement in parents' confidence in a quality school transport service.
5. Organisation of supervised walking routes to schools in villages for primary school children.
6. Introduction of parking perimeters close to schools where parents can leave their cars and accompany their children safely on foot for short distances to and from school.
7. Reinforcement of Police/Warden support in managing traffic in the vicinities of all schools.
8. Creation of measures to encourage parents in using organised school transport and refraining from using private cars.

This White Paper endeavours to stimulate discussion, consultation and analysis of the current traffic situation on the islands in the context of improvements needed in the provision of school transport

services in order to partially help address the traffic situation on the islands. The recommendations in this document will be further investigated to facilitate the development of an effective strategy which can address the challenges of traffic congestion without impacting negatively on the provision of educational services and the commitment of working parents.

This White Paper also signals Government's launch of a consultation process with the general public, civil society organisations, trade unions, business organizations, political parties, governmental institutions and others groups and individuals that would like to contribute towards finding solutions to the challenges of traffic congestion.

4. Issues emanating from Feedback

The following section highlights issues and recommendations from stakeholders consulted during the course of this review:

- School opening hours are already staggered in the morning, i.e., schools opening hours range from 7:40 am until 8:30 am. Provision of initiatives such as breakfast clubs necessitate the earlier opening of schools, and afternoon school programmes also contribute to further staggering of school opening times and subsequently, closing times.
- Traffic congestion is also the result of a considerable number of parents who opt to use their private cars to take their children to and from school. This might be due to parents' concerns in relation to safety issues surrounding the provision of school transport. Supervision on school transport is not provided in state provision while in non-state provision this maybe provided on an adhoc basis.
- Traffic congestion in various arterial roads on the island is caused by other factors besides school opening hours, namely, heavy rain, traffic accidents and prolonged road works. Traffic is also experienced during non-school operational hours.
- Traffic congestion could be alleviated through an improved public transport service
- Traffic congestion is also created due to the fact that school opening hours and the commencement of most of the working hours of employed parents coincide during the same period which cause rush hours. Employees are travelling to work at the same time that students are travelling to school.
- Traffic congestion might be alleviated if non-state schools administer school transport organisation centrally, or else taken over by government to achieve economies of scale accordingly.
- If parents are incentivised by rebates to take their children to school by using school transport it should lead to an increased take up of school transport. School transport fees may be high compared to daily living expenses for some families, and hence transporting one's children to school may be seen as being less expensive.
- Organised transport should be provided free of charge to all students in state primary and middle schools including students at kindergarten level. Students in state senior secondary schools can be issued a special pass to be used on public transport. Similar practices exist in foreign countries.
- Given the fact that private schools are on a smaller scale than state schools, and students come from different localities, drivers try to pick up students from different areas which are widespread. As a result, students are being picked up very early in the morning and spend approximately two hours on board to travel to school.

- In non-state schools conditions for service provision are set by the transport providers and not by the service receivers. This situation does not augur well for a service which needs to revolve around the needs of the students.
- Traffic management and control is to be enforced near all schools during the opening and dismissal hours. The latter is causing havoc and more traffic congestion due to the amount of vehicles (parents, teachers etc.) near the school premises. The amount of parents whose children attend non-state schools, who use their private car may be higher than that in state schools.
- Study ways which can lead to improved co-ordination on infrastructural works on a national and regional level and alleviate traffic congestions by sharing information on scholastic calendars

5. Proposals emanating out of the feedback secured during meetings with stakeholders

1. A thorough, general rethinking of school transport organisation. School transport should be considered as servicing localities and not individual schools and its organisation should be on a national level, hence creating more efficiency in school trip planning.
2. Increase the existing financial incentives for the use of school transport and due consideration by Government to financially subsidise school transport for Church and Independent schools.
3. State Schools already have staggered opening hours. Therefore it is important to study ways on how these openings can be optimized within the existing time brackets to best alleviate traffic congestion. All schools should open at least an hour earlier in the morning and the organisation of extra-curricular activities can be introduced.
4. Non-state schools with earlier finishing hours (as early as 13:00) should be encouraged not to finish school so early, as this may be causing problems for working parents to leave work early to pick up their children accordingly.
5. A major overhaul in improving quality of school transport provision – careless driving, lack of on board supervision, lack of bus safety seatbelts and early morning pick up hours as well as late drop off afternoon hours are quality issues that need to be addressed. This might include on board transport supervision since this absence is possibly allowing greater space for bullying; it is distracting the driver and in some cases he/she have to stop to take adequate measures.
6. Introduction of parking perimeters where parents can leave their cars and accompany their children safely on foot for short distances to and from school.
7. Reinforcement (where available) of traffic support from the relevant authorities in managing traffic in the vicinities of schools.
8. Evaluate how many primary school students attending State Schools eligible for free transport are actually making use of such service and consider the reasons leading to eligible students not making use of the service.
9. Senior school students should be encouraged to start making use of public transport, so as to commence attaining skills in independent life skills. Due consideration is to be given to introduce a subsidised pass for public transport. This proposal must keep in mind that Government is bound by five contracts with transport service providers signed by the previous Government in 2011 which runs until scholastic year 2017/18. These contracts cost Government €7.87 million in scholastic year 2014/2015 and the cost is estimated to increase and has no termination clause therefore cannot be terminated.
10. Explore different dismissal times for students using school transport and students who are picked up by their parents.

11. Incentives and measures should be introduced to try to increase the current percentage of students using school transport which is 75.8 per cent of the student population to at least 95 per cent in State Schools.
12. The school administrations should be supported in the provision of other alternative arrangements made to the traditional school transport that may be in operation. This could include the provision of cycle training, the inclusion of road safety in the curriculum and independent travel training; the provision of walking promotion and barrier removal schemes, car sharing schemes, park and stride/ride schemes.
13. Encouraging the use of bicycles and bicycle lanes in major urban areas. Organisation of supervised walking routes to school in villages for primary school children organised by the school council.
14. Evaluate the benefit of having a door to door service, especially for early and junior years, as well as on board supervision for school transport. Stricter regulations and improved enforcement for school transport providers.
15. School administration should continue to promote appropriate standards of behaviour by students on their journey to and from school through rewarding positive behaviour.
16. Services delivered by heavy vehicles should not coincide with the heavy morning traffic time.
17. Transport should be strictly for far away residencies and be ideally used both morning and afternoon.
18. Agreements should be done with Local Councils so that parking availability for schools' staff would be available according to availability.
19. The Ministry for Education and Employment could discuss with Transport Malta a scheduled transport timetable which could accommodate schools. Students and teachers would then be informed of these schedules to avoid late comers. Public transport as well as road conditions and traffic management should be improved.
20. Children who need to attend in a primary state school in a different locality from where they reside should be kept to a minimum, especially when before and after school provision is provided.
21. Consider the development of a mobile app to illustrate time sensitive traffic flow around Malta, and be able to propose alternative routes to drivers.

6. Conclusion

In considering both the reasons delineated as causing traffic congestion as well as the proposals brought forward to alleviate this major national problem, it is pertinent to ask whether traffic congestion is the consequence of school opening hours. Rather than focusing on the issue of school opening times, this White Paper recommends a wider view of the situation since Malta is experiencing traffic congestion at several peak hours throughout the day. The EU Commission's Country Report 2015:18 also states that:

“Considering the islands’ insularity and the fact that road is the dominant mode for internal transport, a more efficient use of existing road infrastructures through promoting sustainable, collective public transport systems and dissuading the use of private vehicles is key.”

This largely explains why traffic congestion is an issue in Malta, even during school holidays when schools are not open. It has been argued by some stakeholders that school opening and dismissal times should be staggered. It is worth noting here that this is already the case with most of the state schools and this already helps considerably to alleviate congestion. Independent and church schools should consider such practices already adopted by state schools and a national concrete effort is to be seriously taken on board. Other state school measures considerably contributing to lessen traffic congestion at opening and dismissal time are undoubtedly the introduction of breakfast clubs and the continued service of Klabb 3-16 services after school, the former as from 7.00am and the latter normally up to 5.00pm if not later, practically on a daily basis, all year round.

It is also to be borne in mind that the Ministry for Education and Employment is not the sole Ministry responsible to find alternative solutions and the Transport Ministry should be the primary partner in such endeavours. Other Ministries also play a vital role and should have a stakeholder role in this proposal in order to propose/evaluate other measure for alternative transport solutions, as for example the Environment Ministry.

Finally, this White Paper calls for further in depth discussion, consultation and analysis of the current traffic situation on the island vis a’ vis school opening times. In accordance with Budget Speech 2015:40, the recommended solutions need be further investigated so as to pave the way forward in developing an effective strategy which will diffuse traffic congestion without impacting negatively on the provision of educational services and the commitment of working parents whilst keeping in mind that a one size fits all is not an adequate solution. Such solutions need to have a wide support from the key stakeholders and the Government will continue working closely with the stakeholders to deliver effective solutions with minimal negative impacts.

Review of Online Discourse and Key Data

The working group used mainstream, online and social media to obtain insights into public discourse on the theme of School Opening Hours and traffic congestion.

As cited on the *illum.com.mt* news site on Tuesday 30th September 2014, traffic is an issue both in the morning and afternoon, with roads packed with private cars and working vans during the same hours. The staggering of school hours has only served to extend the duration of the 'rush hour'. Traffic problems are exacerbated with road works, deviations and a perceived lack of assistance from traffic police officers. Localities such as Floriana, Hamrun, Marsa, Fgura, Msida, Gzira and Sliema are now synonymous with traffic jams. Solutions to be considered include: limiting vehicles of a certain size on the road during pre-defined hours; removing carriage horses from arterial roads; and restrictions on waste collecting vehicles, ideally collecting refuse during the evening.

According to a Euro barometer survey published on *timesofmalta.com* on Saturday 27th December 2014, Malta has the highest usage of private cars: 70% of the Maltese use their cars daily; 21% use public transport; 7% walk on a regular basis. 42% of Maltese said that they do not use public transport due to lack of punctuality and inadequate routes while 82% mentioned that their worst headache during travelling is traffic congestion. From another study available on carried out by the Institute for Climate Change and Sustainable Development from the University of Malta; it transpired that Maltese drivers spend a total of 52 hours in traffic every year. The average number of seconds delay for every kilometre is estimated to be 16.93, which means 280 per cent more than the 6 seconds spend by European motorists in 2012. According to the study carried out, it was found that the loss of productivity and economic productivity cost the country €118 million in 2012, traffic accidents cost €84million in disability benefits and loss of motorists' productivity and environmental impact of air pollution cost €14 million.

The survey proposes possible actions that may have a positive impact on the traffic congestion. These include an efficient public transport, better park and ride schemes, use and deployment of non-road modes and more efficient use of road network. The Research centre also proposes reducing car fleets while promoting car sharing: the staggering of schools and working hours would not have a direct impact on the amount of traffic but might help with traffic congestion and related costs.

The *maltatoday.com.mt* news website of Tuesday 18th November 2014 highlighted the introduction of different incentives which were announced by the Government during the Budget Speech to reduce the amount of vehicles in our country.

During a press conference held on Saturday 7th March 2015, Prime Minister, Dr. Joseph Muscat announced that as part of the Budget implementation, a White Paper will be drafted to analyse the traffic congestion in relation to school opening hours. In the light of this, the Prime Minister explained that family-friendly measures have to be revised to provide better access to employment

for working parents especially mothers. Initiatives such as Klabb 3-16¹ and Breakfast Club² are meant to provide more flexibility for working mothers.

The response to this proposal by parents and teachers on social media has been overwhelmingly negative. Many believe that children need to spend more quality time with their family rather than spending a whole day either at school or at childcare centres. Others said that if school hours are extended, children will not have time to do school work and extracurricular activities. This may also result in an increase of absenteeism. The majority of teaching personnel protested that schools are becoming more of a 'babysitting venue' than for teaching. Some teachers observed how the proposals would further reduce the time available for preparation of upcoming lessons; others requested for a pay rise.

Transport Minister Joe Mizzi³ too explained that options to cut traffic congestion for good were being currently studied, including a reduction in the size of some roundabouts. He reiterated the need to secure public support for a more efficient public transport system. Malta's high number of cars to space ratio inevitably means that alternative means of transport such as underground transport and sea transport have to be introduced to alleviate traffic congestion. Traffic infrastructure is also challenged by the increasing number of cars on the roads: in one year Malta had a total of 11,000 registrations of new vehicles⁴. Another key factor to consider is the widespread negative perception of school transport by parents.

The return of students to school does have an impact on the flow of traffic. Through a budgetary initiative announced in the Budget Speech for 2015, Government granted a tax credit of €150 to parents whose children attend Church and private school students and who start making use of school transport, however, Edgar Caruana Montaldo, the Chairman of the board at San Andrea Independent School, explained on the *timesofmalta.com* on Monday 24th November 2014 that even though this initiative might make a minor difference, there are still other major factors that compel parents to continue to use their own transport in preference to school transport. These include concerns on the number of available school vans at the moment and the actual safety that these vans afford children. As explained on the *timesofmalta.com* on Tuesday 4th November 2014, parents are requesting school vans to include seatbelts, bags to be locked in the hold, supervision to be carried out by adults and adequate time for pick up in the morning.

An Intelligent Management System will be introduced by 2020⁵ to monitor the flow of traffic in real time. This system will be supported by cameras that will transmit information to drivers about ongoing traffic. To encourage the use of bicycles the government will be refunding 15.25% of the

¹ See www.fes.org.mt

² See www.education.gov.mt

³ See *TimesofMalta.com*, published on Tuesday 4th November 2014
<http://www.timesofmalta.com/articles/view/20141104/local/minister-explores-options-to-cut-traffic-congestion-for-good.542566>

⁴ See *TimesofMalta.com* of Monday 20th October 2014
:<http://www.timesofmalta.com/articles/view/20141020/local/msida-road-works-to-be-speeded-up-bus-lanes-may-be-opened-for-car.540467>

⁵ See [Maltatoday.com.mt](http://www.maltatoday.com.mt)
http://www.maltatoday.com.mt/news/national/44471/road_projects_will_take_the_environment_into_account__mizzi#.VcojJe9021s

price of a bike. The government also promotes the idea of car pooling. To implement this, there is a public private partnership between Transport Malta and a youth group which will be launching a website and a mobile application. Further to this, vehicles using car pooling are encouraged to make use of bus lanes.

The Malta Public Transport Service Chief Executive , Felipe Cosmen admitted on *timesofmalta.com* published on Friday 6th February 2015 that the traffic situation in Malta is worsening⁶. Mr. Cosmen pointed out that one needs to address the problem first, to provide an efficient public transport service. He assured that there will be more buses stand by to cater for day to day problems. He encouraged the introduction of bus lanes and electronic bus cards to save time on each bus stop. Mr. Cosmen mentioned that their priorities would be driver training and an expansion of the bus fleet.

The MODUS project is in process of constructing 9 bus lanes in the most densely populated areas, covering 3,285 metres. The objective of the MODUS project which is mentioned on the *independent.com.mt* website of Tuesday 10th February⁷ is to explore options for improvements in the efficiency of the public transport system. However, the introduction of bus lanes has been met with both positivity and negativity. Case in point, as shown on *independent.com.mt* of Monday 12th May 2014,⁸ Pieta residents were strongly objecting for the development of a bus lane in Triq ix-Xatt. Others believe that the introduction of bus lanes increased traffic jams. An example brought up on "*timesofmalta.com* news site on Monday 29th December 2014 was that at Sliema Strand, traffic jam is always a problem irrespective of what hour one passes. Positive arguments as stated on *timesofmalta.com* of Sunday 22nd February 2015⁹ are that bus lanes may lead to commuters to regain the confidence in public transport and this may decrease the amount of vehicles on the roads because for every two full buses; it means approximately 78 vehicles off.

⁶ See timesofmalta.com <http://www.timesofmalta.com/articles/view/20150206/local/bus-chief-admits-worsening-traffic-situation-a-worry.554950>

⁷ See maltatoday.com.mt :

http://www.maltatoday.com.mt/news/national/49446/gzira_promenade_inner_traffic_lane_reserved_for_buses#.VcokWO9021s

⁸ See www.independent.com.mt : <http://www.independent.com.mt/articles/2014-05-12/news/pieta-residents-object-to-bus-lane-4941709312/>

⁹ See timesofmalta.com <http://www.timesofmalta.com/articles/view/20150222/motoring/To-bus-lane-or-not-to-bus-lane.557170>