

Inspection planning was inadequate. For example, there is no formal risk-based approach for inspections, no inspection frequency has been established for the various licence categories, and information is not maintained on all inspections performed.

There were weaknesses in the performance of inspections. For example, inspectors did not document all violations of the *Act* and *Regulations*, inspectors did not always have access to liquor purchase information necessary to detect contraband, and although overcrowding is a life-safety matter, head counts were not always performed.

Inspectors were not always advised of the final disposition of violations of the *Act* and *Regulations* reported to the Corporation on a timely basis in order to close files and follow-up compliance during subsequent inspections. For example, at the time of our review, details of the action taken by the Corporation on some violations had not been provided to the GSC for up to 29 months after being reported to the Corporation.

Inspectors have not received any inspection and enforcement training since 1997. Furthermore, health inspectors and police force officers who also may participate in inspection activity, have neither received training on the requirements of the *Act* and *Regulations* nor have they been provided with guidance such as a checklist to ensure that inspections cover all the required areas.

2.21 School Bus Safety Program

The Motor Registration Division (MRD) of the Department of Government Services is responsible for administering all activities and legislation respecting vehicles and drivers including driver licensing, vehicle registration, driver examination, and highway safety. The school bus safety program administered by the MRD provides for inspection and enforcement activities in relation to school bus safety.

There were 1,044 licensed school buses in the Province at 30 September 2003. The average age of licensed school buses at that time was 11 years, with 739 or 70 % being 1993 model year or older.

There were 205 Official Inspection Stations licensed in the Province to inspect school buses. Of these, 43 were operated by school bus contractors (including 5 school boards) who have a combined total of 612 school buses (including 335 operated by school boards) or 59% of the total 1,044 licenced school buses at that time.

We are concerned about the high incidence of defects identified during school bus inspections performed by MRD staff and the types of defects being identified. All of these defects relate to brakes, steering, mechanical and safety, and some result in buses being taken out of service. Of the 1,047 inspections performed by MRD during 2002-03, 1,130 defects were identified and 172 school buses (16% of all buses inspected) were taken out of service. The significance of this finding is increased given that MRD does not routinely perform surprise inspections on school buses. Instead, operators are given advance notice of upcoming inspections. As a result, operators are given an opportunity to identify and correct school bus deficiencies before it is inspected. Given the extent of school buses being taken out of service, it is likely that, regardless of MRD's inspection efforts, there are school buses on the Province's highways that do not meet the required safety standards. We note that, although all school buses are inspected by an Official Inspection Station twice a year, the MRD inspections still identify a significant number of serious defects.

There are weaknesses in the inspection and enforcement activities administered at the MRD which could contribute to the presence of unsafe school buses on the Province's roads. In particular: the school bus inspection process is not adequately documented; although the manufacturer of the brake meters used by the MRD to assess braking efficiency on school buses strongly recommends that the meters be recalibrated at least every two years, this is not done; not all school bus inspections were completed by an authorized inspection station in that the Official Inspection Stations were not licensed at the time the inspections were completed; the MRD did not perform the required annual inspection for 8 of the 43 Official Inspection Stations operated by school bus contractors for the 2003 year; and the MRD has not developed a policy and procedures manual to provide guidance to Highway Enforcement Officers relating to school bus safety.