

Children and Young People Overview and Scrutiny Committee – Supplementary agenda No.1

A meeting of the Children and Young People Overview and Scrutiny Committee will be held on:

Date: 8 March 2018

Time: 6.30pm

Venue: Civic Suite - Level 2, Gun Wharf, Dock Road, Chatham ME4 4TR

Items

- 6 Attendance of the Portfolio Holder for Educational Attainment and Improvement (Pages 3 - 12)**

This report sets out the progress made within the areas covered by the Portfolio for Educational Attainment and Improvement, which fall within the remit of this Committee.

This item was not finalised in time for despatch with the main agenda. The Chairman of the Committee is of the opinion that it should be considered at this meeting as a matter of urgency as permitted under section 100B of the Local Government Act 1972 to enable the Committee to consider this item at the same time as the Annual School Performance Report.

- 8 Outcome of Joint Local Area Special Educational Needs and Disabilities (SEND) Inspection (Pages 13 - 32)**

This report advises the Committee on the outcome of the Local Area Special Educational Needs and Disabilities (SEND) inspection undertaken by Ofsted and the Care Quality Commission (CQC) from 4 - 8 December 2017.

This item was not finalised in time for despatch with the main agenda. The Chairman of the Committee is of the opinion that it should be considered at this meeting as a matter of urgency as permitted under section 100B of the Local Government Act 1972 to enable the Committee's comments to be submitted to the Cabinet before it makes any decisions on this matter on 10 April 2018.

10 Special Educational Needs (SEN) Home to School Transport Consultation and Policy Review

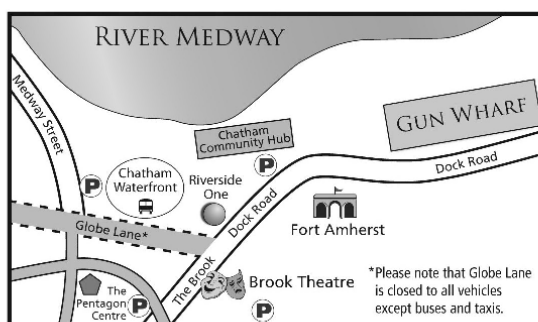
**(Pages
33 -
194)**

This report set outs the proposed amendments to the Council's Home to School Transport Policy in relation to children and young people with Special Educational Needs and Disabilities (SEND) and includes the results of consultation with service users, stakeholders and the wider public.

This item was not finalised in time for despatch with the main agenda. The Chairman of the Committee is of the opinion that it should be considered at this meeting as a matter of urgency as permitted under section 100B of the Local Government Act 1972 to enable the Committee's comments to be submitted to the Cabinet before it makes any decisions on this matter on 10 April 2018.

For further information please contact Jade Milnes, Democratic Services Officer on Telephone: 01634 332008 or Email: democratic.services@medway.gov.uk

Date: 5 March 2018



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CHILDREN AND YOUNG PEOPLE OVERVIEW AND SCRUTINY COMMITTEE

8 MARCH 2018

ATTENDANCE OF THE PORTFOLIO HOLDER FOR EDUCATIONAL ATTAINMENT AND IMPROVEMENT

Report from: Councillor Martin Potter – Portfolio Holder for Educational Attainment and Improvement

Summary

This report details the areas covered by the Portfolio Holder for Educational Attainment and Improvement and covers the period from March 2017-2018. In the case of education services, it covers school outcomes and activity during 2016-17 and the first half of the current school year.

1. Background

- 1.1 The Portfolio Holder for Children's Services – Lead Member is the designated lead member for children's services (LMCS) under the Children Act 2004. The LMCS is responsible for leadership, strategy and the effectiveness of education and children's social care.
- 1.2 The areas within the terms of reference of this Overview and Scrutiny Committee and covered by the Portfolio Holder for Educational Attainment and Improvement, according to the Council's constitution are:
 - Further Education
 - Primary and Secondary Educational Improvement
 - Safeguarding
 - School Organisation and Capital Projects
 - School Services (including Admissions and Medway Test)
 - Schools Liaison
- 1.3 This item was not finalised in time for despatch with the main agenda. The Chairman of the Committee is of the opinion that it should be considered at this meeting as a matter of urgency as permitted under section 100B of the Local Government Act 1972 to enable the Committee to consider this item at the same time as the Annual School Performance Report.

2. Further Education

- 2.1 The Council continues to have a legal responsibility to secure sufficient suitable education and training provision for all young people aged 16-18 in Medway and the work of the newly-formed Skills Board includes a focus to improve opportunities for our 16-18 year old residents.
- 2.2 Medway's Further Education provider, Mid Kent College continues to play a significant role as an education partner. As we heard from the recent Task Group report on Employment Opportunities for 18-25 Year Olds, the college has worked with the Council to ensure appropriate courses and support for young people with Special Educational Needs and Disabilities (SEND) (provision for SEND students sits within the remit of the LMCS). They have also worked in collaboration with a local special school, Rivermead, to create 40 places at the college as a year-long introduction to the mainstream college for pupils with Autistic Spectrum Disorder (ASD) and associated anxieties and vulnerabilities. These places have proved to be successful and very popular.

3. Primary and Secondary Educational Improvement

- 3.1 The focus of the School Challenge and Improvement team continues to be monitoring, identifying and diagnosing under-performance, eliciting and negotiating the school response and helping schools and their governing bodies to find solutions to school improvement. The team also work in partnership with partner organisations to provide challenge and support in raising standards in Medway's education sector.
- 3.2 The key headlines of 2017 school performance:
 - (i) A strong performance in Phonics, outperforming schools nationally.
 - (ii) At Key Stage 1, Medway is now in the top 25% of authorities in England in all three measures.
 - (iii) Attainment continues to improve at Key Stage 2 and the gap is narrowing between Medway Schools and the national average.
 - (iv) Medway schools outperformed schools nationally at Key Stage 4 in the Progress 8 Measure and were below the national attainment level in 'The percentage achieving a 4 or above in English and Maths'.
 - (v) Medway schools outperformed schools nationally in the general Average Point Score measure at Key Stage 5, and overall has improved on last year.
 - (vi) 85% of pupils in Medway were attending a school judged good or outstanding by Ofsted.

- 3.3 We have supported the establishment of the Medway Education Leaders Association (MELA) formed of Medway's primary schools which has been a great milestone for our education sector. The association consists of a leadership board with four learning zones, which work alongside the new area structure in Children's Services. This formation of this organisation is key to avoiding fragmentation of the primary education sector and it will support the greater collaboration we seek between schools as we transition to a sector-led system.
- 3.4 The Medway Education Partnership formed of local education sector leaders, including representatives from MELA and the Secondary Heads Association, Teaching Schools, and Further and Higher Education was established in December. The partnership is chaired by myself and has the scope of providing joint strategic sector leadership with the remit of co-producing and developing the sector education strategy. The partnership forms one of the focus areas of the Children's Transformation board.
- 3.5 Key priorities for the next period are:
- (i) Continue to work with schools, Multi-Academy Trusts (MATs), the Regional Schools Commissioner (RSC) and strategic partners to raise standards and strengthen the capacity of our emerging sector-led system to deliver sustainable school improvement.
 - (ii) Co-produce an effective partnership education strategy between Medway Council and local education leaders who are directly accountable for pupil performance in schools and collectively in learning zones.
 - (iii) Aligning with education policy, continue to adapt the role of the Local Authority as a leading education partner in the Medway education sector as the academisation programme evolves and the direct responsibility for school standards transitions to academies, MATs and the RSC as the accountable body.

4. Safeguarding (Education)

- 4.1 The Local Authority Designated Officer (LADO) team and the Education Safeguarding Officer are responsible for the co-ordination and monitoring of safeguarding activity in schools which sits within this portfolio.
- 4.2 Achievements within this period are detailed below:
- (i) An Education Safeguarding Officer has been appointed, as of August 2017, and takes responsibility for overseeing safeguarding in schools, and offers and guidance regarding child protection issues. The officer facilitates training covering various safeguarding topics for school designated safeguarding leads and staff to ensure that they are appropriately supported and trained in child protection and child in need matters, as set by local and national requirements.

- (ii) During 2017, the training program for the Designated Safeguarding Leads (DSLs) has been updated, and 168 DSLs have attended the training, including 28 new DSLs and 140 who completed the refresher training. This compares to 106 attending DSLs from the previous year.

4.3 Key priorities for the next period are:

- (i) For the Education Safeguarding Officer to continue to undertake safeguarding audits in schools working closely with the School Challenge and Improvement team and Educational Psychologists.
- (ii) Continue to work closely with the LADO team when safeguarding concerns have been raised via parental complaints and Ofsted concerns.

5. School Organisation and Capital Projects

5.1 The School Organisation and Capital Services team ensure that sufficient good quality school places are available to meet demand when and where it is needed. This must be achieved within a limited budget and to a strict timeframe via the Capital Programme Board.

5.2 The team is also responsible for ensuring that maintained schools are quality learning environments but the condition of academy schools is the direct responsibility of the Education and Skills Funding Agency (ESFA).

5.3 Achievements within this period are detailed below:

- (i) Medway is the joint first national provider of good and outstanding school places.
- (ii) Sufficient primary school places have been made available to meet demand through a carefully planned programme of expansions and new schools, each one proposed following robust analysis of annual forecasts, which have been proven by the Department for Education (DfE) to be accurate on all benchmarks, falling well within the 1% error margin.
- (iii) Between 2013 and September 2018, 3075 additional places will have been provided.

Table 1 – Additional school places provided 2013-2018

School	Planning Area	Number of Additional places	Year Implemented
Wainscott Primary School	Strood	210	2013
Brompton Westbrook	Gillingham	105	2013
Napier Primary School	Gillingham	210	2013
Saxon Way Primary	Gillingham	210	2014
Cedar Primary School	Strood	105	2014
New Horizons Academy	Chatham	630	2014
Woodlands Primary	Gillingham	210	2014
Cuxton Infant and Junior	Cuxton	70	2014
Hundred of Hoo	Peninsula	210	2015
St Thomas of Canterbury	Gillingham	30 (Bulge Class)	2016
Delce Academy Infant Phase	Rochester	210	2016
Bligh Infant and Junior	Strood	210	2017
Cliffe Woods	Peninsula	105	2017
St Mary's Island Primary	Gillingham	210	2018
Riverside Primary	Rainham	210	2018
Halling Primary	Cuxton	140	2018
Total		3075	

(iv) Medway was successful in securing four new free schools through wave 12 of the central governments free school initiative. The new schools have been awarded in areas of need following a coordinated approach between the Council, the ESFA and preferred Academy Trusts. These will further ensure that sufficient places are available to meet demand from new housing schemes as well as in the secondary sector as the larger cohorts of pupils currently in the primary phase transition to secondary. The free schools awarded are;

- **The Maritime Academy:** a mainstream all-through (ages 3 to 19) school with places for 1940 pupils (including 250 sixth form pupils) in the Strood area. This will be operated by The Thinking Schools Academy Trust (TSAT). A site is currently being sourced for this school.
- **Medway Academy:** a mainstream secondary school with places for 1150 pupils (age 11 to 19 including 250 sixth form pupils) in the Rainham area. This school will be operated by The Leigh Academies Trust. A site is currently being sourced for this school.
- **Rochester Riverside Church of England Primary School:** a mainstream Christian faith primary school with places for 420 pupils. There was strong competition for this school and the successful bidder is the Pilgrim Academy Trust. This school is expected to open in September 2021 when the development reaches a certain trigger of completed dwellings. The site for the school is agreed and the design is underway.

- **The Beeches:** an alternative provision primary school with places for 35 pupils with behavioural issues and excluded children. This will be managed by the Rowans Academy Trust and will be located adjacent to the current Rowans site in Walderslade.

(v) Schools have continued to convert to academy status and as at 1 March 2018 there are 70 academies out of 103 schools (68%).

Table 2 – Breakdown of academies and maintained schools in Medway

Phase	Type	Number	Conversions	New Schools	% of phase	% of overall
Primary	Academies	48	47	1	62	47
	Maintained	30			38	29
Secondary	Academies	16	15	1	94	16
	Maintained	1			6	1
All-Through	Academies	1	1	0	100	1
	Maintained	0			0	0
Special	Academies	4	3	1	80	4
	Maintained	1			20	1
PRU	Academies	1	1	0	50	1
	Maintained	1			50	1
Overall	Academies	70	67	3		68
	Maintained	33				32

(vi) The schools condition programme continues to be managed within budget ensuring school environments are warm, safe, dry and compliant for the children and staff. The Condition Programme covers maintained schools only; academies are funded directly from the ESFA for their maintenance and condition work.

5.4 Key priorities for the next period are:

- Ensure sufficient secondary school places are available to meet demand as larger pupil cohorts transition from the primary sector. The introduction of the Maritime and Medway Free Schools will help to ensure a sufficiency of places in the non-selective sector, but sites are required for these schools, and this is currently being investigated in partnership with the DfE. A programme of expansions is underway to ensure that additional grammar school places are available to meet increased demand. An additional 3 Form Entry (FE) is expected to be in place for September 2018, with further expansions adding places for 2019 and 2020.
- With the Council's Local Plan forecasting significant population growth, work continues to ensure that school places will be provided to meet the demand from the new housing schemes.

6. School Services (including Admissions and Medway Test)

6.1 The School Services team continues to be responsible for school admissions, home to school transport for mainstream children and the Medway Test, as well as leading on Dynamics, the Medway Music Education Hub.

6.2 Achievements within this period are detailed below:

- (i) Dynamics, the Medway Music Education Hub continues to go from strength to strength and is one of the top performing music education hubs in the country. The hub offers learning and development opportunities for children and young people across Medway with a range of opportunities for our young musicians to perform, particularly in ensemble arrangements. This is delivered in the form of in-school provision, tuition, music centres and music festivals.
- (ii) Following a task group led by myself and supported by music education partners, Dynamics has been established as a CIC (Community Interest Company) aligning with the local and national vision to encourage music hubs to expand and enhance music education provision and opportunities for children and young people.
- (iii) Since January 2018, Medway Council has created a more effective and efficient admission system for in-year (casual) admissions for own admission authority schools and academies. Families applying for these schools now do so directly with the school.
- (iv) Online applications continue to be very successful with over 98% of applications for school admissions being made online. The annual admissions composite prospectus also moved to a new digital information guide for both primary and secondary. This removed the need to print and distribute almost 12,000 papers copies of these booklets.

6.3 Key priorities for the next period are:

- (i) Continue to be an active partner supporting the further development of Dynamics Community Interest Company (CIC), the Medway Music Education Hub.
- (ii) Following the successful introduction of the new process for in-year (casual) admissions for own admission authority schools and academies, implement the de-delegated system for community and voluntary controlled schools as agreed at cabinet in February.
- (iii) Implement the recommendations of the Medway Test review audit.

7. School Liaison

- 7.1 Since being in post I have enjoyed visiting over half the schools and academies in Medway. I have an ongoing programme of visits to our schools underlining my commitment to continue to maintain strong relationships with our schools and academies.
- 7.2 I have scheduled meetings with the RSC and regularly meet with MELA, previously the Primary Heads Consortium, with the Director for Children and Adults' Services and the Lead Member for Children's Services. In addition to this, strategic leaders from across the sector have joined the Medway Education Partnership, which I chair, and the partnership includes leading MAT and Headteacher representatives.
- 7.3 I have contributed to the activities of the Medway Cultural Education Partnership (MCEP) including attending their conference and meeting with the lead officer for the region from the Royal Opera House Bridge (RohBridge). The Partnership brings together schools, further and higher education, music education hubs and wider partners to improve alignment of arts education for young people, including a focus on the health and wellbeing benefits of participation in the arts.
- 7.4 School Challenge and Improvement Leads (SCILs) have worked in partnership with the MCEP to secure additional grant funding from RohBridge in order to improve the transition of pupils from year six into year seven. A pilot project over 18 months will see two cohorts of pupils supported to enable more effective transition to occur and provide a model for integrated networking amongst other feeder primary schools and their secondary schools. The project supports the aim of increasing rates of inclusion in Medway and driving down exclusions so that all pupils can realise their potential.
- 7.5 As a member of the Skills Board, I will be working with colleagues to develop the Skills agenda for Medway. The remit of the board includes developing opportunities for the young people to better support education leavers in having the skills to access and progress in career pathways.
- 7.6 I am pleased to see the excellent Medway Youth Council has gone from strength to strength and its members are a great credit to the Medway Community. Last year I attended their Annual Conference on the topic of bullying and I look forward to supporting their efforts with this campaign and their future work.
- 7.7 I sit on the University Liaison Committee, hosted by the University of Kent, and I have had the pleasure of attending a number of events including the Kent Student Awards 2017 and perhaps most importantly I also attended the university graduation ceremonies in July and November. I am proud to be an advocate for our universities and I will continue to promote their aspirational outreach work.

Appendices

None

Background Papers

None

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**CHILDREN AND YOUNG PEOPLE
OVERVIEW AND SCRUTINY COMMITTEE
8 MARCH 2018**

**OUTCOME OF JOINT LOCAL AREA SPECIAL
EDUCATIONAL NEEDS AND DISABILITIES (SEND)
INSPECTION**

Report from: Ann Domeney, Deputy Director, Children and Adults
Author: Wendy Vincent, Head of Integrated 0-25 Disability Services

Summary

The Medway Local Area was inspected by Ofsted and the Care Quality Commission (CQC) from 4 - 8 December 2017.

The inspection focussed on the local area's effectiveness in identifying and meeting the needs of disabled children and young people and those who have special educational needs.

The Local Area Special Educational Needs and Disabilities (SEND) inspection outcome letter was published on 8 February 2018.

The inspection was welcomed and has identified a number of strengths in Council and Clinical Commissioning Group (CCG) services.

Ofsted and the CQC have concluded that as the inspection also identified a number of areas for development, the Local Authority and CCG are required to submit a joint Written Statement of Action to the Department for Education (DfE).

Evaluation and analysis of the outcome letter is being completed and a draft cross agency implementation plan is being drawn up to build on the strengths identified and address the areas of weakness.

The report is presented to the Committee for consideration and comment. Any comments from this Committee will be presented to the Cabinet on 10 April 2018.

1. Budget and Policy Framework

- 1.1 This report is within the Council's Policy Framework.
- 1.2 The Special Educational Needs and Disabilities (SEND) reforms introduced in 2014 are designed to bring together education, health & social care services across local areas to transform specialist provision for young people who have a special educational needs or disabilities and are aged 0 – 25 years old.
- 1.3 This report informs the Children and Young People Overview and Scrutiny Committee of the outcome of the SEND Local Area Inspection which was carried out jointly by the Office for Standards in Education, Children's Services and Skills (Ofsted) and the Care Quality Commission (CQC) between the 4 and 8 December 2017.
- 1.4 This item was not finalised in time for despatch with the main agenda. The Chairman of the Committee is of the opinion that it should be considered at this meeting as a matter of urgency as permitted under section 100B of the Local Government Act 1972 to enable the Committee's comments to be submitted to the Cabinet before it makes any decisions on this matter on 10 April 2018.

2. Background

- 2.1 The purposes of the Local Area SEND Inspections are to evaluate how local areas are discharging their duties in relation to SEND. These duties are contained in the Children and Families Act 2014 and elaborated on in the statutory guidance, 'Special Educational Needs and Disability Code of Practice: 0-25 Years' (the Code of Practice). These duties came into force in September 2014.
- 2.2 Inspections of Local Area arrangements for SEND began in May 2016 and to date 46 local areas have been inspected. All local areas will be inspected at least once over a five-year period. The outcomes of the inspection are published on the Ofsted website in the form of a letter to the Director of Children and Adults Services which sets out strengths and priorities for improvement.
- 2.3 Depending on the findings, a local area may be required to provide a written statement setting out the actions that it will take to any areas of development identified, and the timescales for taking these actions. A written statement will be required in the event that inspectors identify concerns in relation to the way the local area is meeting its duties under the Children and Families Act 2014.
- 2.4 Of the 46 Local Areas that have been inspected to date, 18 (40%) have been required to provide a written statement of action. It should be noted that 50% of the local areas inspected since March 2017 have been required to provide a written statement of action indicating a tougher inspection regime.
- 2.5 The Inspection Framework emphasises that Local Area Inspections evaluate the effectiveness of all relevant partners in the local area in fulfilling their responsibilities for SEND. The inspection therefore evaluates the contribution

and impact of the Local Authority, the Clinical Commissioning Group (CCG), Public Health, specialist services, early years settings, schools and further education providers. In the event that an action statement needs to be submitted following an inspection, the report will make clear which partner agencies are responsible for preparing and submitting the statement.

2.6 The inspection focused on three broad areas:

- The effectiveness of the local area in **identifying** children and young people who have special educational needs and/or disabilities.
- The effectiveness of the local area in **assessing and meeting** the needs of children and young people who have special educational needs and/or disabilities.
- The effectiveness of the local area in **improving outcomes** for children and young people who have special educational needs and/or disabilities.

2.7 The inspectors considered evidence particularly in relation to:

- The accuracy of the local area's self-evaluation.
- The extent to which outcomes for children and young people are improving.
- The efficiency of identification of special educational needs and disabilities, and the timeliness and usefulness of assessments.
- How well local agencies and bodies co-ordinate their work to assess needs and provide support.
- How well the local area engages with children and young people, and parents/carers, to inform strategic commissioning of services.
- How well the local area involves individual children and young people, and parents/carers, in the process of assessing their individual needs.
- The extent to which the local area gives due regard to its duties under the Equality Act 2010 to children and young people with special educational needs and/or disabilities.
- The effectiveness of the Leadership and Governance overseeing the SEND Reforms.

2.8 During the inspection, inspectors visited a nursery, several schools and a college, in addition to specialist health services. They met with key officers from health, education and social care, and sought the views of parents, carers and young people on their experience of services. They also reviewed samples of children's and young people's case notes and Education, Health and Care (EHC) Plans. It should be noted that the inspectors did not meet with the Lead Member for Children's Services or any other Members during the inspection.

3. Advice and Analysis - Medway Local Area SEND Inspection Outcome

3.1 The inspection was welcome and largely confirmed senior leaders' evaluation of SEND services in the local area.

- 3.2 The outcome from the inspection was contained in a letter addressed to the Director of Children and Adult Services and published on the Ofsted website on 8 February 2018. A copy of this letter is included in Appendix A to the report.
- 3.3 The inspection team found many strengths in the services being delivered. These included:
- Children and young people reported that they felt safe.
 - Effective joint working in early years across the council and health services that ensured young children's special educational needs and disabilities were identified and met effectively in a timely manner.
 - Outcomes for children who have special educational needs are improving across both primary and secondary schools.
 - Children and young people and their parents reported that their needs were being met and they felt supported in school.
 - Children who are looked after and have special educational needs and disabilities benefit from high standard health assessments.
 - The services and support offered by the council SEN Team are valued by school leaders.
 - Parents spoke highly of the council visual impairment team and equally praised the Medway Hospital Paediatric Specialists.
- 3.4 The inspection team noted that prior to the inspection Medway Council and the CCG had identified some areas of development and had started to make improvements to services.
- 3.5 The inspectors concluded that the inspection raised some concerns about the effectiveness of the local area and requires the Local Authority and Clinical Commissioning Group (CCG) to jointly produce and submit a written statement of action to Ofsted within 70 working days from receipt of the final report. This written statement must explain how the local area will tackle the following areas of significant weakness:
- the lack of joint strategic leadership across the area between the Council, the CCG and education providers;
 - the lack of a clearly communicated strategy that is understood and shared by leaders across the area;
 - the extent to which providers in the area take suitable responsibility for ensuring the effective implementation of the reforms;
 - the lack of clearly understood and effective lines of accountability;
 - the quality and rigour of self-evaluation and monitoring and its effectiveness in driving improvement;
 - the sufficiency of information to inform accurate evaluation;
 - the quality of education health and care plans; and
 - the lack of effective co-production at all levels.
- 3.6 The Local Authority is working jointly with school leaders, the CCG and parents to prepare a joint action plan which will build on the strengths identified and address the areas for development.

3.7 A SEND Improvement Board has been set up with representatives from the Local Authority, CCG, parents and school leaders. This group will be chaired by the Lead Member for Children's Services and have the remit to direct the development of the improvement action plan. The membership will be finalised by the end of March 2018 but initially include:

- Cllr Andrew Mackness (Chair), Lead Member for Children's Services
- Neil Davies, CEO, Medway Council
- Stuart Jeffery, Chief Operating Officer, Medway CCG
- Ian Sutherland, Director of Children and Adult Services, Medway Council
- Medway Parent Carer Representative
- Ann Domeney, Deputy Director Children and Adult Services
- Sarah Vaux, Chief Nurse, Medway CCG
- Mary Mason, Designated Clinical Officer, Medway CCG
- Rebecca Smith, Medway School Improvement Team
- Wendy Vincent, Head of Integrated 0-25 Disability Services
- Tina Lovey, Special School Head
- Davinder Jandu, Primary School Head

3.8 The Improvement Action Plan will focus on:

- Strategic leadership providing effective oversight of the SEND agenda.
- Improvement to the co-production model across all services.
- An audit and review of the Education, Health and Care Plan process which aims to improve the quality of the Education Health and Care Plan issued and identification and analysis of data to inform accurate evaluation.
- Development of a shared Local Area SEND Strategy.

4. Key Implications

4.1 The findings of the inspection note that young people who have a special educational need or disability achieve well and report that they feel safe in Medway.

4.2 The inspectors identified a number of strengths in the services provided to children and young people who have a special educational need or disability in Medway. However, the inspection team were concerned that there is a lack of joint leadership and strategic overview of the implementation of the SEND Reforms.

4.3 The Local Authority and CCG are required to produce a written statement of action and submit this to Her Majesty's Chief Inspector (HMCI), the DfE, DH and CQC within 70 working days of the publication of the outcome letter and publish on our website. Where a written statement of action is required, the DfE, working with NHS England, will seek to engage closely with the local area to provide appropriate challenge and support to bring about the necessary improvements identified by the inspection.

4.4 After a period of time, usually around 12 months after the publication of the inspection report, the DfE will advise the Minister on progress in delivering the

improvements. In exceptional circumstances, this may include a recommendation to Ministers for a further inspection by Ofsted and CQC.

5. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
The written statement of action is not completed within 70 working days of the publication of the outcome letter.		Preparation of the written statement of action was started immediately after the inspection and prior to the inspection outcome letter being published.	D3
The DfE do not approve the written statement of action.	Following submission of the written statement of action, the DfE will assess its fitness for purpose. If it is not approved the DfE will allow the local area a further 10 days to make improvements.	To ask the DfE SEND and NHS England advisors to review the written statement of action prior to submission.	D3
The Minister does not agree that significant progress has been made to improve within one year and orders further action such as further scrutiny and monitoring, a direction to improve or further inspection.	After 12 months, the DfE and NHS England are required to submit a report to the Minister who will assess whether or not the actions in the written statement of action have been achieved.	To work closely and regularly with the DfE and NHS England advisors to monitor progress.	D3

6. Consultation

- 6.1 There is a requirement on the local area to publish the approved written statement of action on the CCG and Local Authority websites and the Local Offer website.
- 6.2 There is an expectation that parents and young people will co-produce the written statement of action and be involved at every stage of its implementation.

7. Implications for Looked After Children

- 7.1 Nationally 67% of looked after children have some level of special educational needs.
- 7.2 All looked after children in Medway are known to the Virtual School whose role is to provide additional support to children and schools and ensure that looked after children are making good academic progress.
- 7.3 National benchmarking data shows that Medway looked after children who have special educational needs, do as well or better than their peers.

8. Financial implications

- 8.1 Until the SEND Improvement Board has been established and the action plan agreed it's not possible to determine the financial impact.
- 8.2 Where possible the action plan will deliver improvements in consultation with the Leader Member for Children's Services within existing resources. If additional resources are required to implement the action plan a further report will be referred to Cabinet and Council as appropriate.

9. Legal implications

- 9.1 The Local Authority has a responsibility to ensure young people with additional needs have access to an appropriate education as set out in regulations for EHC plans. Health and schools have responsibilities to provide services to meet the needs of young people in the area. The inspection judgement is a shared responsibility with the Clinical Commissioning Group.

10. Recommendations

- 10.1 The Committee is asked to consider the outcome of the Special Educational Needs and Disability (SEND) Local Area Inspection and refer any comments to Cabinet for consideration.
- 10.2 The Committee is asked to agree that a regular update on the progress of the SEND Improvement Plan be presented to the Committee.

Lead officer contact

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Appendices

Appendix A – Medway Local Area SEND Inspection Outcome Letter

Background Papers

None

Ofsted
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31 January 2018

Appendix A

Ian Sutherland
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Caroline Selkirk, Chief Executive NHS Kent and Medway Clinical Commissioning Group
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Dear Ian Sutherland

Joint local area SEND inspection in Medway

Between 4 December 2017 and 8 December 2017, Ofsted and the Care Quality Commission (CQC) conducted a joint inspection of the local area of Medway to judge the effectiveness of the area in implementing the special educational needs (SEN) and disability reforms as set out in the Children and Families Act 2014.

The inspection was led by one of Her Majesty's Inspectors from Ofsted, with a team of inspectors including an Ofsted Inspector and a children's services inspector from the CQC.

Inspectors spoke with children and young people who have SEN and/or disabilities, parents and carers, and local authority and National Health Service (NHS) officers. They visited a range of providers and spoke to leaders, staff and governors about how they were implementing the SEN reforms. Inspectors looked at a range of information about the performance of the local area, including the local area's self-evaluation. They reviewed performance data and evidence about the local offer and joint commissioning.

As a result of the findings of this inspection, and in accordance with the Children Act 2004 (Joint Area Reviews) Regulations 2015, Her Majesty's Chief Inspector (HMCI) has determined that a Written Statement of Action is required because of significant areas of weakness in the local area's practice. HMCI has also determined that the local authority and the area's clinical commissioning group (CCG) are jointly responsible for submitting the written statement to Ofsted.

This letter outlines our findings from the inspection, including some areas of strength and areas for further improvement.

Main findings

- Leaders across the local area have not implemented the SEN reforms well enough. Medway's education and service leaders do not share one vision and strategy for SEN and/or disabilities. Local area leaders' actions to influence, challenge and work with providers across the area have had limited success. A considerable number of parents shared concerns with inspectors that the needs of their children are not being identified and met sufficiently well.
- Council and CCG leaders have not worked jointly at a strategic level to implement the reforms. No arrangements are in place to ensure effective joint oversight and clear lines of accountability for work across education, health and care services.
- Regular changes in senior leadership, interim appointments and vacancies have contributed to disjointed communication and initiatives not being seen through. Little progress has been made in addressing several of the pressing priorities for improvement identified as far back as 2012. The council's current special educational needs and disabilities (SEND) strategy 2016 to 2020 contains some of these same priorities. Leaders' understanding of what has and has not improved in the meantime is limited.
- Several key leaders have taken up post relatively recently. They are keen to learn from past mistakes and aware of the most urgent issues that need to be resolved. However, action plans are not routinely in place or sharp enough to ensure effective work and self-evaluation which leads to improvement. Performance information is not consistently comprehensive and is not analysed routinely well enough to support effective self-evaluation.
- Education, health and care (EHC) plans are not of sufficient quality to prove consistently helpful for families and professionals working to meet the needs of the child or young person who the plan is for. Where a child or young person has a health need, this aspect is often missing from their plan.
- The collaborative work between professionals and children and their families to plan services and meet individual needs, known as co-production, is weak at both a strategic and individual level.
- The extent to which pupils who have SEN and/or disabilities have their needs met well in maintained schools is too variable. Although improving, rates of permanent and fixed-term exclusion are still notably higher for pupils who have SEN and/or disabilities in Medway than for similar pupils nationally. Some schools have excluded pupils with SEN at increasingly high rates in recent years. Leaders in these schools have not done enough to improve the situation over time.
- Current health contracts do not consistently meet the needs of children and young people who have SEN and/or disabilities effectively. This is despite joint commissioning arrangements having been in place since the reforms commenced. For example, young people between the ages of 19 and 25 years newly identified as having SEN and/or disabilities are not able to receive support from children's

therapy services.

- Effective joint working in the early years helps to ensure that young children's SEN and/or disabilities are identified and met effectively in a timely manner.
- Typically, outcomes for pupils who have SEN without an EHC plan are improving in both primary and secondary schools.
- Children and young people who inspectors met consistently reported that they felt safe and well cared for in the settings they attend. Several expressed concerns that they did not feel safe in their community as they were worried they might be at risk from those engaged in criminal activity. There is clear evidence of joint working and communication across agencies to ensure a clear understanding of the situation, tackle issues of concern and reduce anxiety in the local community.

The effectiveness of the local area in identifying children and young people's special educational needs and/or disabilities

Strengths

- The local area's approach to identifying needs in the early years is effective. When a baby is identified as, or suspected of having, SEN and/or disabilities at or prior to birth, a joint visit to the family by the health visitor and therapist takes place within 10 to 14 days of the infant's birth. This helps to ensure clear communication and a shared understanding of the infant's needs. This also leads to timely referral and access to services.
- Health visitors make good use of the routine assessments offered to all children at 10 months and between the ages of two and two-and-a-half years. Where a developmental delay is indicated, families are provided with the opportunity to attend group sessions – 'Little Builders' following the 10-month review and 'Big Builders' following the review at two to two-and-a-half years. These sessions provide helpful support to the child and family and enable professionals to effectively identify the child's needs and make suitable referrals to specialist services. There is high take-up of this offer.
- Children with significant developmental delay who attend Snapdragons special needs nursery run by health services (formerly Woodlands) benefit from timely support which helps them make a smooth transition to a mainstream nursery or school Reception class.
- Suitable arrangements are in place to aid effective information-sharing between health and education professionals when children transfer from nursery to school and from a mainstream to a special school. Where appropriate, health visitors carry out home visits jointly with early years staff and school nurses to help ensure that parents only need to 'tell it once'. This helps to ensure that children who have SEN and/or disabilities will continue to have their health needs met before, during and after key transitions.

Areas for development

- Although a high proportion of EHC plans are completed on time, this can be at the expense of the quality of the plan. Quite often, plans are deemed as complete without important information about a child or young person's social care or health needs having been received or taken into account.
- Health services working with children and young people who have SEN and/or disabilities are not routinely asked for the information needed to inform the EHC plan. Universal health services rarely contribute to the EHC process. Practitioners in some health services, such as the child and adolescent mental health services (CAMHS), told inspectors that they are called on to contribute information less often than they were prior to the reforms. Consequently, those developing EHC plans do not have all the information they need to identify all of the child or young person's needs.
- The long-term aspirations and needs of young people who have SEN and/or disabilities are often not identified well. Consequently, some EHC plans do not provide clarity about the intended purpose of post-16 study or what educational and social care provision will be needed to ensure that a young person can access employment or supported employment in adulthood.
- The local area issues a high rate of direct payments to children and young people to help them access provision such as transport and short breaks. However, EHC plans do not always clarify what need will be met by the use of this payment. Consequently, direct payments are not always linked to identified needs or monitored against clearly defined outcomes.
- At times, when a child or young person has previously had a statement of special educational needs, out-of-date information is used to inform the writing of a plan. In these cases, the EHC plan does not provide a full picture of the current needs of the child or young person or how these can be met.
- Some schools have highly effective systems to identify and support pupils with SEN. However, not all mainstream primary schools identify and meet pupils' SEN early enough. This means that pupils do not always get the support they need from the beginning. As a result, some parents believe that the EHC process is the only way to ensure that their children's needs are met. The recent spike in requests for children to be assessed for an EHC plan signals that this is a growing concern.
- Although there is some effective work to ensure timely sharing of information at transition points, this aspect of practice needs further attention, particularly when a young person leaves a special school or specialist provision in a mainstream school at age 16. In this situation, EHC plans often fail to identify what a young person might need to cope with the challenges of the next stage of their education.
- The local area's approach to identifying and assessing children who have autistic spectrum disorder (ASD) does not meet national requirements. Children

are assessed and diagnosed by community paediatrics or CAMHS depending on their age. However, due to long waiting times of six to nine months, children are not consistently assessed and diagnosed through the Autism Diagnosis Observation Schedule. This does not comply with National Institute for Health and Care Excellence (NICE) guidelines.

- Local area leaders have rightly recognised that the development of a NICE-compliant ASD pathway is a pressing priority. However, previous council and health leaders also identified this as a priority as far back as 2012. No progress appears to have been made in the intervening period. It is clear that current leaders are committed to resolving this issue. It is too soon to know if they will be more successful than their predecessors.

The effectiveness of the local area in meeting the needs of children and young people with special educational needs and/or disabilities

Strengths

- Young children who have been identified as vulnerable with an additional health need benefit from the 'My Plan' approach, overseen by the health visiting service. A single plan, the 'My Plan' identifies all services that will be supporting the child. This is helping to ensure effective joint working and reduced duplication between services. As a result, children and their families receive the support needed more swiftly than was previously the case.
- Children and young people attending effective education settings reported that they felt well supported and their needs were well met. Parents agreed.
- The services and support provided by the SEN team are valued by the school leaders who engage with it. These leaders report positive relationships and communication with the team. This has helped them understand how best to utilise funding to meet the needs of children who have SEN and/or disabilities. The recent introduction of a clear and transparent approach to accessing additional funding without needing to apply for an EHC plan is helping these schools better meet the needs of pupils who have SEN and/or disabilities.
- School leaders who engage with them value the effective training and support paid for by the local authority and provided by Bradfields Academy and The Marlborough Centre, the specialist provision for ASD at Hoo St Werburgh Primary School. Leaders also spoke positively about guidance and support provided by the educational psychology service.
- Parents who had experience of it spoke highly of the service for the visually impaired. They equally praised the approach and support of the Medway hospital paediatric specialists.
- The use of a 'health passport' completed with the family when a child with complex needs is admitted to hospital ensures that all the practitioners involved in the child's care are consistently equipped with the information needed to meet the child's needs well.

- Children who are looked after and who have SEN and/or disabilities, placed within a 30-mile radius of Medway, benefit from high-standard review health assessments. Leaders also make sure that the same quality of assessment is made available to such children placed further afield. This approach helps to ensure that the health needs of these children are met equally well regardless of their geographical location.

Areas for development

- The local area's approach to co-production at strategic and individual level is weak. The extent to which local area leaders have worked successfully with parents, carers, children and young people to create effective approaches to implementing the reforms has been very limited.
- Members of Medway Parent Carer Forum (MPCF) reported disappointment that, despite much work, they have not been able to make a difference. They are hopeful that the recently signed co-production agreement with health services will lead to an improvement. However, it is too soon to tell.
- The published local offer, which the MPCF was consulted about, includes much useful information. However, area leaders and the MPCF both report that it is not consistently up to date. Additionally, the fact that the information is not all directly accessible from one website can make it difficult to navigate.
- A considerable number of parents were not sufficiently involved in the development of the EHC plan for their child. EHC plans are typically not co-produced in line with the expectation of the 2014 reforms. A summary assessment meeting (SAM) is convened to enable parents and practitioners to work together for children in the early years and young people over the age of 16. However, for most children and their families, there is no clear agreed arrangement to ensure that they are involved in the production of EHC plans.
- Typically, although the views and aspirations of the child and family are captured in the first section of the EHC plan, key points from this are often not referenced in the rest of the plan. Even where the production of a plan has been supported through the SAM meeting, this has not consistently ensured true co-production. A plan shared with an inspector, which council officers believed would be an example of good practice, did not capture the view of the child at all.
- A considerable number of parents shared their concerns about a lack of real involvement in the development of the EHC plan for their child. A few parents reported that when a plan was developed from an existing statement of special educational needs it was effectively 'done by post' with no face-to-face discussion at all.
- The varying and often poor quality of EHC plans means that those carrying out the plan do not have to hand key information which could help them ensure that children and young people's needs are well planned for. EHC plans scrutinised by inspectors contained a variety of weaknesses. In some cases, key information was missing. In others, the assessment of the child or young person's needs was

not precise enough to be really useful.

- Some mainstream schools are not effectively meeting the needs of children and young people with SEN and/or disabilities. This is particularly evident in the high level of permanent and fixed-term exclusions of children who have SEN but do not have an EHC plan. Some headteachers have not recognised their responsibility to utilise effective alternative provision to support pupils at risk of exclusion who are struggling to cope in mainstream lessons.
- Due to a lack of sufficient local spaces, Medway places a high proportion of children and young people who have SEN and/or disabilities in provision outside the area. Some parents' lack of confidence that needs can be met locally compounds the issue. These 'out of area' placements use a considerable amount of the local area's SEN budget. The high costs associated with transporting children and young people to this provision put a further strain on the budget. This leaves less money available to support children and young people with SEN and/or disabilities being educated in Medway.
- Leaders have rightly recognised the importance of increasing the volume of suitable local provision. However, there is no clear plan in place to successfully bring this about. Where new provision has been built, this is not consistently being fully utilised. This is the result of ineffective communication between the local authority and schools. Consequently, there is no shared understanding of how to meet the needs of children and young people who have SEN and/or disabilities in the area.
- The local authority has recently changed its approach to funding leisure activities, clubs and residential experiences, known as short breaks. The new approach encourages an increasing use of direct payments. Leaders reported that this was to try and create an offer more pertinent to individual children and young people's needs. However, children and parents who communicated with inspectors had mixed views about the impact of this. Some did not know where to find information about what was on offer or how to access it. One young person told inspectors he had enjoyed attending a short-break provision but could not attend it anymore because he had reached the age of 18.
- Some parents and school leaders reported that specialist transport arrangements for taking children to special schools and provision were not suitable. There are concerns that the bus escorts are not suitably trained to support children and young people with complex needs. One special school reported that the current transport provider is excluding some pupils from the bus rather than meeting their needs.
- Historically, children and young people who have SEN and/or disabilities and their families have had difficulties accessing CAMHS. This has contributed to social, emotional and mental health needs not being consistently or effectively met.
- Young people with emerging mental health concerns who have children of their own do not consistently have their mental health needs assessed and met. Health visitors reported that accessing specialist services for older young people is difficult unless the young person is already known to CAMHS. The new service

due to be in place from April 2018 is intended to address this gap. However, it is too early to judge how effectively this will be done.

- Children requiring assessment and intervention from more than one health professional are not routinely offered a joint assessment. This increases the likelihood of multiple appointments and can lead to greater stress for families and possible duplication or gaps in provision.
- Young people who are newly identified as having SEN and/or disabilities between the ages of 19 and 25 years are not able to receive support from children's therapy services due to the current commissioning arrangements. This is in breach of the 0 to 25 SEND Code of Practice 2014. Inspectors were not assured that the new service that starts next spring will address this gap.
- Some children who have been identified as having speech and language needs and requiring support from the therapy service are not consistently having their needs met quickly enough. These children can experience a wait of up to 18 weeks from being referred to accessing treatment.
- Health practitioners across all services have not been able to access formal training on the SEND reforms or how this should result in changed practice for the benefit of children and young people. Frequent changes in staff contribute to a fragmented service.
- Parents typically do not know about the published local offer or the information, guidance and support available from the Special Educational Needs and Disability Information, Advice and Support Service (SENDIASS). This service is working to raise its profile but the message is not getting through well enough. Parents that inspectors spoke to who had experienced the service reported that the support provided was useful. Currently, SENDIASS is developing an improved approach to evaluating its effectiveness. However, it is too soon to judge the success of this approach.

The effectiveness of the local area in improving outcomes for children and young people with special educational needs and/or disabilities

Strengths

- Effective provision in the early years is helping to ensure that children with SEND get off to an increasingly good start. In 2017, the proportion of these children reaching a good level of development at the end of Reception was notably higher than for similar children nationally, whereas in 2016 it was in line with the national figure.
- Effective school leadership of provision for SEN contributes significantly to pupils' positive experiences and outcomes. Special schools and specialist provision in mainstream schools are typically meeting the needs of their pupils effectively. The extent to which mainstream schools meet the needs of pupils who have SEN and/or disabilities is more variable. However, overall, schools are improving and this has resulted in an improvement in outcomes, including for pupils who have

SEN and/or disabilities.

- Children who have SEN and/or disabilities without an EHC plan are achieving increasingly well in English and mathematics in primary school. The proportion of these children reaching the expected standard in phonics at the end of Year 1 has increased at twice the national rate and was above the national average in 2017. Children's achievement by the end of primary school has improved and was in line with that of similar children nationally in 2016 and increased considerably further in 2017.
- The achievement of school pupils who have SEN and/or disabilities without a statement of special educational needs or an EHC plan has also improved steadily over time in secondary schools. In 2016, at the end of key stage 4, on average, these pupils made progress in line with that of all pupils nationally in English, mathematics and other subjects.
- The proportion of young people with SEN and/or disabilities without an EHC plan reaching level 2, including in English and mathematics by the age of 19, although still lower than that of similar young people nationally, has increased notably in recent years. The proportion of young people with a statement of special educational needs or an EHC plan reaching this measure was also in line with the national figure in the last set of published data.

Areas for development

- Although outcomes are improving, significant groups of pupils are not consistently having their needs identified and met well enough to ensure that they achieve good outcomes.
- Typically, the outcomes in EHC plans are not sharp enough to ensure that children and young people have all their education, care and health needs met. Outcomes defined in plans are often too broad to enable sharp evaluation of the effectiveness of the plan. In some cases, outcomes are too narrow to be helpful or relate to the service being provided rather than the needs of the child.
- The level of fixed-term and permanent exclusion is high. Effective challenge and support to some schools, initiated by the local authority, have led to a notable reduction in the number of pupils who have SEN and/or disabilities experiencing exclusion. However, some schools have proved hard to engage with and are not doing enough to improve outcomes for pupils at risk of exclusion.
- Absence rates for pupils who have SEN and/or disabilities with and without an EHC plan have increased. Levels of absence and persistent absence were higher than for similar primary-age pupils nationally last year. The proportion of pupils with SEN without an EHC plan with poor attendance at secondary school was also high in relation to similar pupils nationally in 2017.
- EHC plans typically lack focus on preparing young people for adult life. Little consideration is given to the type of education and social care support that a young person will need to achieve employment or supported employment.

- The proportion of young people leaving college to take up employment at the age of 19 is low. Local area leaders recognise the need to tackle this. The introduction of a supported internship programme for eight young people is a step in the right direction. However, the local area does not have a clear shared plan in place for improving pathways to employment.
- Local area self-evaluation has been too limited to contribute effectively to improving outcomes. Area leaders are aware of the most pressing issues that need addressing. However, leaders do not have a clear enough understanding of the impact that their work to implement the 2014 reforms has had on children and young people who have SEN and/or disabilities and their families.
- The council and CCG SEND strategies are not underpinned by effective action plans. Analysis of performance information is not detailed enough to aid sharp evaluation of where work is having the greatest impact or where further improvement is needed. Consequently, local area leaders and elected members have a limited understanding of the improvement journey and what works and does not work. This has been compounded by considerable changes of senior leadership since 2014. Over time, leaders have not been well placed to intervene quickly when a change of approach is needed.
- The recent appointment to the role of designated clinical officer (DCO) demonstrates the local area's commitment to ensuring strategic oversight of the implementation of health aspects of the reforms. The DCO has quickly gained the confidence of practitioners across the partnership. Work to establish a clear action plan to tackle the most urgent priorities is underway. However, it is too soon to judge the impact of the DCO's work.
- Joint commissioning arrangements have taken time to develop. A joint CCG and council commissioning team has been in place since 2013 and effectively staffed since 2014. The local area has recognised that current health service contracts are not effectively or consistently meeting the needs of children with SEN and/or disabilities. New jointly commissioned contracts for universal public health services and mental health and well-being services will commence in April 2018 and new contracts for other children's health services will commence from June 2018. Leaders are confident that this will result in improvements. It is too early to evaluate the effectiveness of this work.

The inspection raises significant concerns about the effectiveness of the local area.

The local area is required to produce and submit a Written Statement of Action to Ofsted that explains how it will tackle the following areas of significant weakness:

- the lack of joint strategic leadership across the area between the council, the CCG and education providers
- the lack of a clearly communicated strategy that is understood and shared by leaders across the area

- the extent to which providers in the area take suitable responsibility for ensuring the effective implementation of the reforms
- the lack of clearly understood and effective lines of accountability
- the quality and rigour of self-evaluation and monitoring and its effectiveness in driving improvement
- the sufficiency of information to inform accurate evaluation
- the quality of EHC plans
- the lack of effective co-production at all levels.

Yours sincerely

Ofsted	Care Quality Commission
Christopher Russell Regional Director	Ursula Gallagher Deputy Chief Inspector, Primary Medical Services, Children Health and Justice
Diana Choulerton HMI lead inspector	Karen Collins-Becket CQC inspector
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Cc: Department for Education
Clinical commissioning group(s)
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CHILDREN AND YOUNG PEOPLE OVERVIEW AND SCRUTINY COMMITTEE

8 MARCH 2018

SPECIAL EDUCATIONAL NEEDS (SEN) HOME TO SCHOOL TRANSPORT CONSULTATION AND POLICY REVIEW

Report from: Helen Jones, Assistant Director, Commissioning, Business and Intelligence

Author: Graham Tanner, Partnership Commissioning Programme Lead

Summary

This report outlines proposed amendments to the Council's Home to School Transport Policy in relation to children and young people with Special Educational Needs and Disabilities (SEND) and minor consequential amendments and clarifications to the Policy for mainstream pupils. The revised policy is set out at Appendix 3 to the report. For comparison Appendix 4 to the report sets out the existing Home to School Transport Policy and Appendix 5 provides a summary of the amendments.

In order to inform the policy amendments, the Council has recently completed a consultation, in accordance with Cabinet decision number 132/2017, as set out in section 4, with service users, stakeholders and the wider public on some key principles around future service provision and how travel assistance arrangements may be allocated and determined for pupils with SEND.

It is important to note that these proposed changes do not impact on the Council's statutory duties or national guidance to determine eligibility for travel assistance. The proposed changes are about how services are commissioned and provided locally to meet the Council's obligations and ensure the future viability and sustainability of services.

The proposed changes will help to ensure that travel assistance support can continue to be provided to all eligible children and young people in line with increasing demand. They also provide the opportunity to offer a more flexible range of options to families and improve the quality of the service provision.

The outcome of the public consultation and resulting recommendations are detailed within the report and Appendix 1 and 2 to the report respectively.

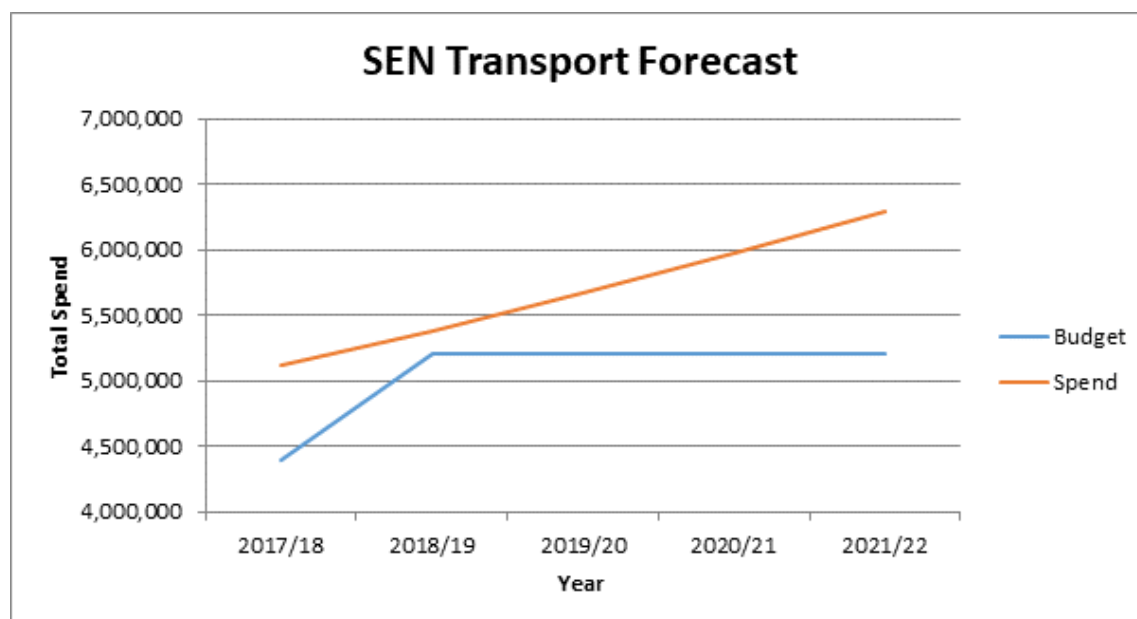
1. Budget and Policy Framework

- 1.1 All local authorities have a statutory duty to have in place arrangements for the provision of home to school travel assistance and transport for children and young people with Special Educational Needs and Disabilities (SEND) who meet the published eligibility criteria.
- 1.2 The Council's Home to School Transport Policy as determined by Cabinet in April 2017 (decision numbers 24/2017 and 25/2017 refer) was developed within a national legal framework that sets out what local authorities must do to facilitate travel to school and sets out eligibility criteria for granting that support.
- 1.3 Under Section 7 of the Education Act 1996, it is the responsibility of the parent of every child of compulsory school age, to cause their child to receive efficient full-time education either by regular attendance at school or otherwise. The duties and powers of local authorities to provide home to school travel assistance are covered in other sections of the Act and its amendments. The provision of travel assistance support incorporates consideration for children from low-income families.
- 1.4 Sections 508B and 508C of the Education Act 1996 (as amended) set out the local authority's duties and powers respectively, to make such suitable travel arrangements as the local authority considers necessary, to facilitate a child's attendance at school. This applies to home to school travel arrangements and vice versa. They do not relate to travel between educational institutions during the school day.
- 1.5 The current policy and the proposed revision have been written with due regard to the Department of Education's statutory 'Home to School travel and transport guidance' published in July 2014 and the Equality Act 2010.
- 1.6 The (Special Educational Needs (SEN) Transport budget for 2017/18 is £4,402,621.
- 1.7 The SEN transport budget has been consistently overspent in the last five years. In 2016/17, the SEN Transport budget was overspent by £1.2m. In order to reduce the Council budget deficit for 2017/18, a budget increase of £0.385m was agreed. The 2017/18 round 3 monitoring shows that the budget is forecasted to overspend by £0.915m. The budget will be rebased by £0.800m in 2018/19. The target saving for 2018/19 is £0.200m. There may be an additional pressure on this budget arising from the September intake.
- 1.8 Operational and service delivery changes are therefore imperative if services are to be effectively delivered and sustained within budget in future years.
- 1.9 This item was not finalised in time for despatch with the main agenda. The Chairman of the Committee is of the opinion that it should be considered at this meeting as a matter of urgency as permitted under section 100B of the Local Government Act 1972 to enable the Committee's comments to be submitted to the Cabinet before it makes any decisions on this matter on 10 April 2018.

2. Background

- 2.1 Meeting its statutory duty is putting increasing pressure on the Council budget as the number of eligible children requiring travel assistance, the complexity of their needs and the cost of providing travel assistance increases.
- 2.2 It is therefore important that the Council works closely with parents, carers, schools and transport operators in the coming years to provide the best possible value for money in providing this support.
- 2.3 Similarly, the Council is committed through its Special Educational Needs and Disability (SEND) and Inclusion Strategy 2016–2020, to ensure that children and young people with SEN are ‘provided with opportunities to develop resilience and learn to be as independent as possible, as they transition to adulthood’. The Council, therefore, needs to ensure that travel assistance is provided through the least restrictive means in line with the strengths and abilities of the child or young person being supported.
- 2.4 The graph below (Figure 1) predicts the projected forecast against the current budget over the next four years assuming the Council’s current policy stays the same and the known demographic changes.

Figure 1 – SEN Transport Budget Forecast 2017/18 to 2021/22



3. Options

- 3.1 The options are that the Council continues to provide SEN travel assistance using existing allocation criteria and processes resulting in increasing budget pressure year on year, or, through a consultative process and dialogue with parents/carers and transport operators, steps are taken to evolve the Council’s approach to providing education travel assistance.

4. Advice and analysis

4.1 On 21 November 2017 Cabinet agreed to a public consultation on a number of amendments and clarifications to the Policy to ensure that travel assistance support can continue to be provided to all eligible children and young people in line with increasing demand (decision number 132/2017 refers). Amendments will also provide the opportunity to offer a more flexible range of options to families and improve the quality of service provision. The Council is committed to ensuring that young people with SEN are provided with opportunities to develop and learn to be independent as possible, as they transition into adulthood.

4.2 The following amendments and clarifications to the policy are proposed:

4.3 PROPOSAL - ONE (Definition of Education Travel Assistance)

4.3.1 It is proposed that the name of the Home to School Transport Policy for pupils with SEN be amended to 'Education Travel Assistance Policy'. The name change reflects the fact that travel assistance can be provided in a variety of ways, not just through the provision of 'transport' e.g. a bus or a taxi.

4.4 PROPOSAL - TWO (To formalise the annual application and review process)

4.4.1 Currently travel assistance arrangements for children and young people are assessed and determined at the time they start at a new education setting. This means, for example, that a young person starting in Year 7 may have their travel assistance arrangements rolled forward until they finish in Year 11. This approach does not always take account of the personal development of individual children and young people, opportunities to promote independence and any changing individual or family circumstances e.g. medical needs.

4.4.2 A simple online application and review form will be introduced to support this process.

4.5 PROPOSAL - THREE (Personal travel assistance budget (PTAB) and cash allowance)

4.5.1 Where a child or young person is eligible, care will be taken to ensure that travel assistance is provided in the most appropriate and least restrictive way possible. In the case of high volume routes, shared transport arrangements are likely to continue to be the most cost effective and sustainable solution under most circumstances. However, in the case of solo or ad-hoc arrangements a cash allowance or direct payment in the form of a Personal Travel Assistance Budget may provide greater flexibility for families and carers to make their own arrangements.

4.5.2 This means from September 2018, every new application for travel will be considered for a cash allowance or, in cases of complex or exceptional needs, a direct payment in the form of a Personal Travel Assistance Budget. Other direct support will continue to be available where appropriate, for example a travel pass for public transport, a walking escort or shared transport.

- 4.5.3 Personal Travel Assistance Budgets (PTABs) represent the value of the cash allowance, plus an additional payment to support parents/carers to arrange personalised, flexible travel arrangements that suit the needs of their child and family. Under this arrangement parents/carers would not need to show the Council how their PTAB is spent. Parents/carers could spend the budget however they like as long as their child is supported to attend school regularly and on time.
- 4.5.4 Five key distance bands are proposed to calculate the standard amount offered in relation to a Personal Travel Assistance Budget.
- 4.5.5 This is the maximum proposed allocation for each distance banding and each application will be considered on an individual basis, taking into account the level of additional needs and requirements.

Table 1 – Proposed Personal Travel Assistance Budgets in relation to distance banding

Distance bandings	Annual Personal Travel Assistance Budget cap	Equivalent cash allowance value for maximum distance within this banding (based on a return journey @ 40p/mile reimbursement rate and 190 school days per year)
3 miles and under	£1,000	£456
3.1 miles to 5 miles	£1,200	£760
5.1 to 7 miles	£1,800	£1,064
7.1 to 10 miles	£2,500	£1,520
>10 miles	£5,000 *	As determined by mileage

* £100 per mile for each additional mile in excess of 10 miles, PTAB capped at £5,000

4.6 PROPOSAL - FOUR (Travel training)

4.6.1 Travel training gives people with special educational needs or disabilities the confidence and skills to travel on buses and trains. Help can also be provided for walking routes. Being able to travel on public transport is a key life skill. It lets you make choices about how you live, go about your daily life and fulfil your potential. Training can be individually tailored to the needs of the young person and include aspects like:

- confidence in using buses or trains
- personal safety
- how to use timetables and buy tickets
- road safety, including how to cope with traffic on major roads
- what to do when things go wrong (e.g. the bus is late) and
- money skills

4.6.2 Medway Council is looking to source a provider of Travel Training to support young people to access independent travel where families and carers consider this to be appropriate to their needs.

4.6.3 It is recognised that it will be important to work with parent/carers and education settings to identify suitable young people for travel training and to work within the young person's time frame.

4.7 PROPOSAL - FIVE (Pick up points)

4.7.1 The Council's existing Home to School Transport Policy already includes the use of 'pick-up points' i.e. a central location where a mini-bus or taxi will pick-up and drop-off pupils travelling on any given route. However, travel companies have not regularly been doing this when planning their routes. Pick-up points will not be appropriate for all routes.

4.7.2 It has been suggested that from September 2018, all contractors will be asked to consider safe pick-up and drop-off points for their routes, taking into account the needs of individual pupils allocated to that route. Such arrangements will potentially benefit pupils by minimising the amount of time they are required to spend sat in transport on the journey to and from school.

4.7.3 A pick up or drop off point may be a public car park or other suitable location and would require the support of all parent/carers to ensure they are available at the allocated time.

4.8 PROPOSAL - SIX (Respite)

4.8.1 The Council recognises the value of Short Breaks and respite in supporting families and carers of children and young people with disabilities. In some circumstances transport to and from the location of that respite care will be integral to that support. At the current time, the Council supports and funds transport to respite to a range of settings, some of which is planned and others which are more ad hoc. Ad hoc short notice requests from parents and carers are challenging to accommodate and can cause disruption and therefore incur additional cost to planned travel arrangements.

4.8.2 It is therefore proposed that the Home to School Transport Policy is revised to require at least 5 working days' notice to set up any such arrangements (exceptional circumstances will be supported). Families requiring respite may also be offered a Personal Travel Assistance Budget to support them to manage these arrangements themselves.

4.9 PROPOSAL - SEVEN (Post 16 transport)

4.9.1 Whilst young people are now required by law to be engaged in education, employment or training up to the age of 19, Local Authorities do not have a statutory duty to provide home to school/college transport free of charge for learners aged 16 to 19 in the same way as they do for primary and secondary aged pupils up to the end of Year 11. Subsidised post-16 transport is, therefore, a discretionary provision.

- 4.9.2 In line with many other Local Authorities, it is therefore proposed that Medway pupils accessing 16+ education, for example attendance at college, will be required to contribute to their travel assistance arrangements.
- 4.9.3 All students aged 16-18 (Year 12-14) who require assistance travelling to school or college will be required to pay a contribution towards the total cost of travel. This contribution will be reviewed annually and published within Medway's Post-16 Travel Assistance statement. This applies regardless of whether they are living in the parental home.
- 4.9.4 Learners/parents/carers will be notified of the cost of contribution in advance of the young person attending Post 16 provision. This will be done once a request for travel support has been approved.
- 4.9.5 Requests for payment will be made termly at the beginning of each term. Contributions must be paid immediately so that transport arrangements can be made. In the event that there is a problem with the contribution the Council must be contacted at the earliest opportunity.
- 4.9.6 Where a young adult with a learning difficulty and/or disability aged 19 – 25 has a named education / training provider in their Education, Health and Care (EHC) Plan, and, if taking into account their personal circumstances, transport is necessary to enable them to access this provision, then transport to/from the place of learning/training will be arranged on an individual basis without charge.
- 4.9.7 It is proposed that the pupil contribution for 16-18 (Year 12-14) be set at £600 per academic year with a 25% reduction for low income families (instalment options to be available). Pupils accessing post 16 education will be offered a Personal Travel Assistance Budget or travel pass, or under exceptional circumstances an allocation may be made on shared transport.
- 4.9.8 Any travel assistance offered would therefore be less than contribution.
- 4.10 The revised Travel Assistance Policy is set out at Appendix 3 to the report. For comparison Appendix 4 to the report sets out the existing Home to School Transport Policy and Appendix 5 provides a summary of the amendments.
- 4.11 There are minor consequential amendments and clarifications to the Policy for mainstream pupils.
- 4.12 A Diversity Impact Assessment (DIA) on the proposed amendments to the Policy is set out at Appendix 6 to the report.

5. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Unsustainable financial burden	In the absence of changes to service delivery, there is a risk that fulfilling its statutory duties in relation to home to school transport becomes financially unsustainable with a resultant impact on the wider council budget.	Consultation on proposed changes to the Home to School Transport Policy on actions which may reduce costs and implementation of recommendations.	A2
Legal challenge as a result of proposed amendments to the policy.	It is possible that the proposed changes to the Medway Home to School Transport Policy could be legally challenged.	Consultation with service users and key stakeholders and a review of Case Law and challenges associated with similar policy reviews in other LA areas.	C3
Risk of additional appeals, Local Government Ombudsman investigations or Judicial Review as a result of applying amended policy to decision making process for individual children and young people	The proposed policy changes include more regular scrutiny of individual Travel Assistance arrangements. This raises the possibility of additional challenge and appeal if changes are made to Travel Assistance arrangements.	Statutory guidance is very clear in relation to eligibility for Travel Assistance. If individual circumstances change and eligibility is affected, it is appropriate that Assistance is reviewed. Any changes to the Assistance offer for existing recipients would be discussed and agreed collaboratively with parents/carers.	B3

6. Consultation

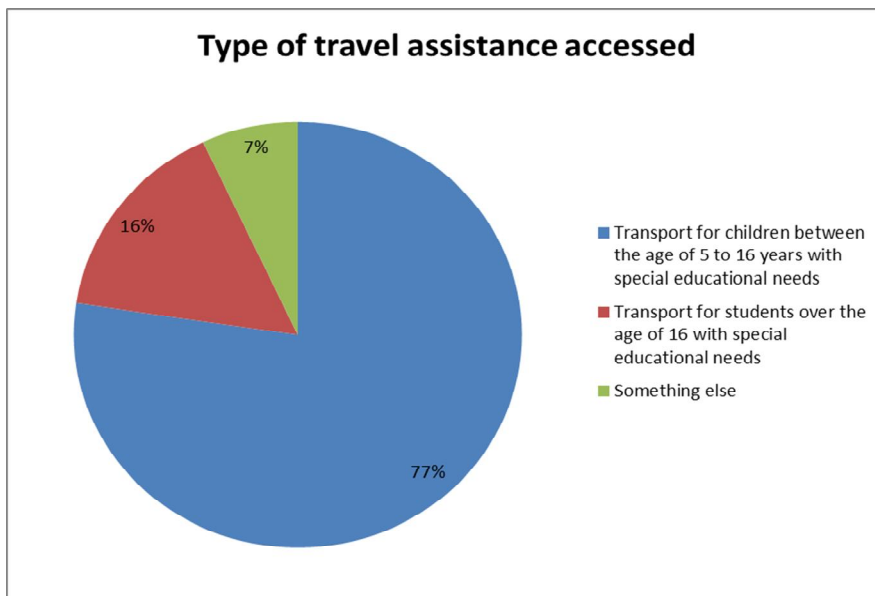
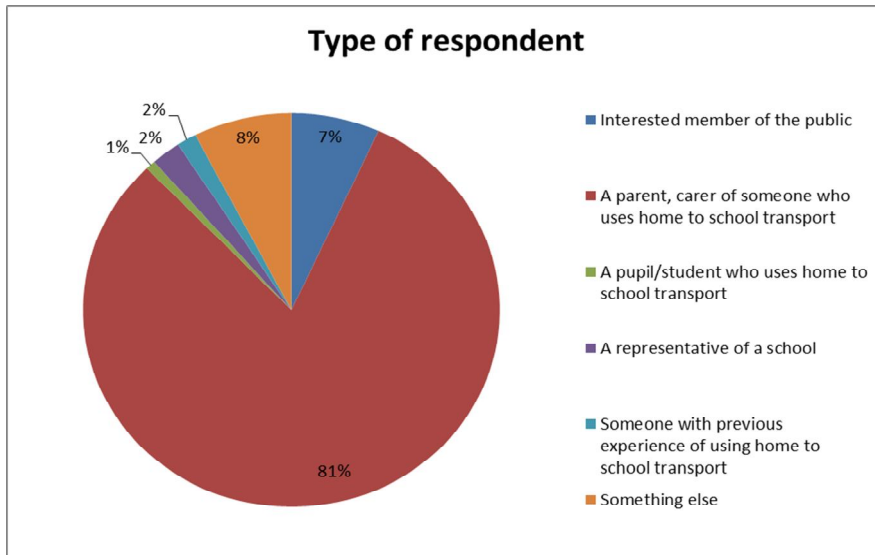
6.1 Following approval from Cabinet on 21 November 2017, a consultation commenced on Friday 5 January 2018 and ran to Friday 16 February 2018. The consultation included:

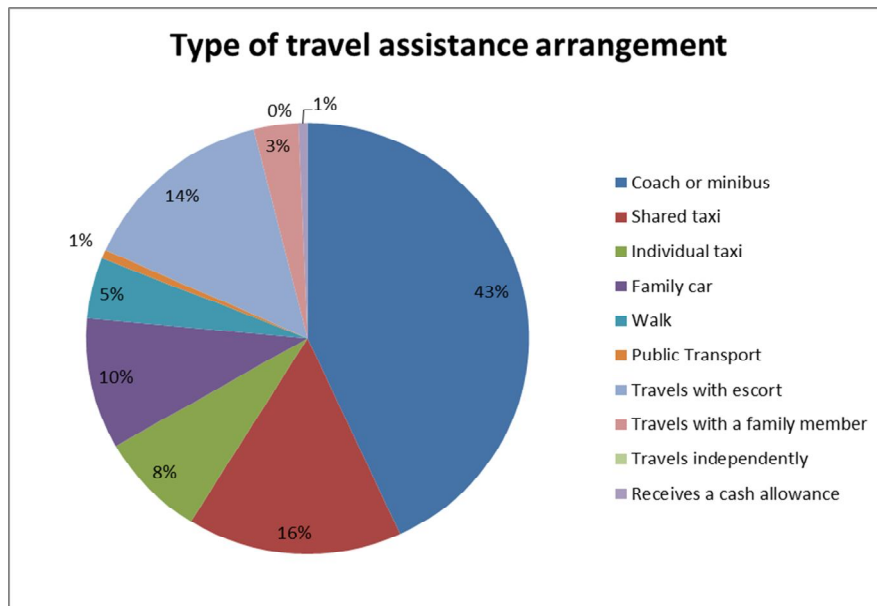
- pre-consultation and co-production discussion with the Medway Parents and Carers Forum (MPCF);
- online information and questionnaire at medway.gov.uk/sen;
- a letter to all families on the SEN database (not just those in receipt of home to school travel assistance);
- a letter to Medway schools;
- an email to transport providers; and
- an information session at a scheduled Medway Parents and Carers Forum coffee morning at Gillingham Golf Club on Tuesday 30 January.

6.2 132 responses were received to the questionnaire.

6.3 70 people (including Medway Council staff and MPCF Committee members) attended the information session on 30 January.

6.4 The following three charts provide a breakdown of the make-up of respondents to the questionnaire.





- 6.5 Section 7 details responses to each of the seven proposals outlined in section 4 of the report.
- 6.6 Verbatim responses to the questionnaire are included in Appendix 1 of the report.
- 6.7 Detailed feedback from the MPCF Coffee Morning event is included in Appendix 2 of the report.

7. Summary of consultation responses to the seven proposals

PROPOSAL ONE - Definition of Education Travel Assistance

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Review and recommendations
<p style="text-align: center;">PROPOSAL ONE</p> <p style="text-align: center;"> ■ Agree ■ Disagree ■ Not Sure </p> <p> Agree – 35% Disagree – 31% Not sure – 35% </p>	<p>“It’s a name change intended to reflect the reality.”</p> <p>“It seems like a title that describes what the Policy is.”</p> <p>“Amending the way families access transport basically means cut backs in my opinion.”</p> <p>“It sounds like children and parents are going to be forced to change the current travel provision.”</p> <p>“I feel that what the policy is called is quite irrelevant. As long as everyone who needs help receives it.”</p>	<p>The proposal to rename the ‘Home to School Transport’ Policy (SEND and Mainstream as ‘Education Travel Assistance’ is important to emphasise that the Council is not obliged to offer ‘travel assistance’ in the form of vehicular transport as the default option.</p> <p>For the most part, respondents did not have strong views either way and it is therefore recommended that PROPOSAL ONE is implemented.</p> <p>This is reflected in the revised Policy document appended to this report (Appendix 3).</p>

PROPOSAL TWO - Annual application and review process

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Review and recommendations
<p style="text-align: center;">PROPOSAL TWO</p> <p>A pie chart titled 'PROPOSAL TWO' showing the distribution of feedback. The chart is divided into three segments: a blue segment representing 'Agree' at 32%, a red segment representing 'Disagree' at 41%, and a green segment representing 'Not Sure' at 27%. A legend to the right of the chart identifies the colors: blue for Agree, red for Disagree, and green for Not Sure.</p> <p>Agree – 32% Disagree – 41% Not sure – 27%</p>	<p>“Taking personal circumstances into account is helpful and not treating every person or family as one size fits all approach.”</p> <p>“This does seem like a good idea, as situations can change over time although the applications should be looked at on a case to case basis as everyone is different. And the application should not be too complicated and long winded.”</p> <p>“It seems to me the council are putting disadvantaged children at risk in order to save money. Only a parent and the school should be allowed to decide if and when a child is independent enough to change the travel arrangements. Not somebody who works for the council and has little to no understanding of the impact that change could have on the child.”</p> <p>“More paperwork is NOT what SEN parents need - a simple phone call to check for changes in circumstances would be a better use of parents time and reduce the headache for parents.”</p>	<p>Formalising the annual application and review process is considered to be the best solution for ensuring that travel arrangements for individual pupils are routinely reviewed in line with their needs and requirements. It is important to stress that this is not an assessment and review of eligibility for travel assistance (unless a change of address or other material change of circumstance dictates that such eligibility requires review).</p> <p>The annual application and review process will ensure that the needs and requirements of all pupils are consistently assessed and reviewed and that travel assistance continues to be provided in line with the young person's changing needs and personal development (with the support of families and carers).</p> <p>The majority of respondents were either in Agreement or Unsure about this proposal. It is recommended that PROPOSAL 2 is implemented but that work is undertaken with the SEN team to streamline review processes, in so far as is possible.</p>

PROPOSAL THREE (Part 1) - Personal travel assistance budget / Cash allowance (PATB)

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Review and recommendations
<p style="text-align: center;">PROPOSAL THREE</p> <p>■ Agree ■ Disagree ■ Not Sure</p> <p>Agree – 32% Disagree – 30% Not sure – 38%</p>	<p>“Enables families to make their own arrangements where possible but still allows for shared transport if this is a better option.”</p> <p>“In many cases where ad hoc or solo arrangements are required it is because there is no reasonable local provision for a child with SEN. In principle I agree with the proposal, however care must be taken that the policy is fair and doesn’t discriminate against any child and that PTAB is practical, taking into account the family circumstances, especially lone parents.”</p> <p>“I feel this, again is just making the process more lengthy and complex to deter applications from parents, carers and their children.”</p> <p>“I think this will add too much confusion and make it the parents/carers responsibility and they have enough to worry about without arranging transport.”</p>	<p>32% of respondents were in agreement with the proposal to introduce Personal Travel Assistance Budgets.</p> <p>38% were unsure.</p> <p>30% disagreed with the proposal.</p> <p>The majority of those who disagreed were concerned about their individual circumstances.</p> <p>Guidelines in relation to Direct Payments / Personal Budgets are clear i.e. they cannot be implemented without the express agreement and support of recipients and therefore, as described, it is proposed that PROPOSAL THREE is implemented in discussion and agreement with individual families for whom such an arrangement may be beneficial.</p>

PROPOSAL THREE (Part 2) - *Personal Travel Assistance Budget (PTAB) Values*

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Review and recommendations
<p style="text-align: center;">PATB VALUES</p> <p>A pie chart titled 'PATB VALUES' showing the distribution of responses. The chart is divided into three segments: a blue segment for 'Agree' at 21%, a red segment for 'Disagree' at 50%, and a green segment for 'Not Sure' at 39%. A legend to the right of the chart identifies the colors: blue for Agree, red for Disagree, and green for Not Sure.</p> <p>Agree – 21% Disagree – 50% Not sure – 39%</p>	<p>“I think these amounts are fair.”</p> <p>“I think this will help people greatly with getting their children to school and back.”</p> <p>“I’m all for a child being independent but everything has to be done for the safety of the child.”</p> <p>“These amounts are likely to be nowhere near what is required to get SEN children to school if parents are having to make their own arrangements (and therefore unable to get volume discounts that councils may be able to arrange).”</p> <p>“Again, bad idea, you’re just passing the buck to parents to organise travel which may not get done. Stop trying to change and cap services for disabled children.”</p> <p>“These budgets are too high. For instance, based on 39 weeks a year, 5 days a week - 195 days. That equates to over £5 per day to take a child less than 3 miles to school. Way over the cost of doing so.”</p>	<p>The majority of respondents either disagreed or were unsure about the proposed distance bandings and funding levels for Personal Travel Assistance Budgets (PTAB). The levels that have been proposed are set as a premium payment over and above the 40p per mile cash allowance rate and are based on levels provided by other comparator authorities.</p> <p>The purpose of a PTAB is to meet reasonable additional costs associated with a young person’s journey to school, over and above reimbursement of fuel. They are not designed to be a payment towards a parent or carers time.</p> <p>As discussed above, a PTAB can only be implemented with the express support of the recipient.</p> <p>It is recommended that PROPOSAL 3 is implemented for applications for travel assistance in 2018/19 but that funding levels are kept under regular review in line with the evidenced costs of supporting individual travel assistance arrangements.</p>

PROPOSAL FOUR – *Travel Training*

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Review and recommendations
<p style="text-align: center;">PROPOSAL FOUR</p> <p style="text-align: center;"> ■ Agree ■ Disagree ■ Not Sure </p> <p> Agree – 44% Disagree – 24% Not sure – 32% </p>	<p>“Having travel training will enable pupils to prepare for adulthood, managing finances and learning what to do in difficult situations. This could help those pupils with mental health issues to have a reduced anxiety level knowing how to cope if a bus is late.”</p> <p>“My son has speech issues and processing issues so teaching him these skills would be perfect. I, myself have tried but been unsuccessful. I think others would gain greatly with this support too.”</p> <p>“I want children to arrive at school not stressed and tired from their travel training, anything could upset them and put them in a mood where they can't concentrate at school, due to the stress of it all.”</p> <p>“Who do I sue when something goes wrong, my son has no concept of time or danger.”</p>	<p>44% of respondents agreed with this proposal. 24% disagreed.</p> <p>It is therefore recommended that PROPOSAL FOUR is implemented and that the Council seeks to source a provider of Travel Training to support young people to access independent travel where families and carers consider this to be appropriate to their needs.</p> <p>It's recognised that it will be important to work with parent/carers and education settings to identify suitable candidates for travel training and to work within the young person's time frame.</p>

PROPOSAL FIVE - *Pick Up Points*

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Review and recommendations
<p style="text-align: center;">PROPOSAL FIVE</p> <p style="text-align: center;"> ■ Agree ■ Disagree ■ Not Sure </p> <p> Agree – 20% Disagree – 55% Not sure – 25% </p>	<p>“Depending on the suitability of the points. My daughter currently gets dropped off on a main road by a local school and at times can be quite busy.”</p> <p>“I am happy to deliver my son to an appropriate pick up point and collect him from an agreed drop off point.”</p> <p>“I currently have a 1.5 hour ride on my minibus ride paid by the council, having this in place could reduce my time on transport and give me more time at home to be social. This could be the same for other pupils.”</p> <p>“Autistic children would never cope with the waiting that this proposal would invoke. And children with health problems would potentially be waiting out in the cold in winter were this to be implemented, thus putting them at risk, a frankly daft idea.”</p> <p>“Certainly no pick up points, that's appalling, what happens when transport is late? As it stands at least the vulnerable child is in their safe home.”</p>	<p>The majority of respondents either disagreed with or were unsure about this proposal.</p> <p>The majority of concerns related to pupils with learning disabilities and challenging behaviour, for whom respondents considered such arrangements to be unsafe, parents/carers who were concerned about timekeeping of other parents/carers and parents/carers who were concerned about the impact on sibling and work travel arrangements.</p> <p>It is important to stress that there is no legal obligation for the council to provide a door to door service unless a pupil's EHC Plans or other assessment of need determines this to be essential.</p> <p>In light of concerns, however, it is proposed that PROPOSAL FIVE be partially implemented in 2018/19 and that commissioners and transport providers work with a small cohort of willing participants to pilot this approach on specific routes. The effectiveness and viability of these pilot arrangements will be reviewed prior to any wider roll-out.</p>

PROPOSAL SIX - Respite

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Further considerations and recommendations
<p style="text-align: center;">PROPOSAL SIX</p> <p>A pie chart titled 'PROPOSAL SIX' showing the distribution of responses. The chart is divided into three segments: a large blue segment representing 'Agree' at 52%, a smaller red segment representing 'Disagree' at 10%, and a green segment representing 'Not Sure' at 38%. A legend to the right of the chart identifies the colors: blue for Agree, red for Disagree, and green for Not Sure.</p> <p>Agree – 52% Disagree – 10% Not sure – 38%</p>	<p>“There is no reason why you shouldn't have 5 days notice.”</p> <p>“Think this is a completely reasonable.”</p> <p>“This allows for exceptional circumstances and sometimes respite can happen as a result of an emergency.”</p> <p>“Respite is sometimes needed urgently and if you have to pick your child up from respite to get them to school then it defeats the purpose of respite in my opinion.”</p> <p>“Again, if the child is in receipt of the mobility aspect of DLA, shouldn't this be being used?”</p>	<p>The majority of respondents (52%) were in favour of this proposal with just 10% disagreeing.</p> <p>Those who did disagree were primarily concerned with unexpected and/or crisis circumstances which may necessitate short-term arrangements. The proposal makes clear that any such exceptional circumstances will be supported where possible although the Council cannot guarantee to meet every request.</p> <p>It is important to ensure that, where possible, as much notice as possible is provided to offer the best chance for Travel Assistance Co-ordinators to secure appropriate and cost effective arrangements.</p> <p>It is, therefore, proposed that PROPOSAL SIX is implemented.</p>

PROPOSAL SEVEN - *Post 16 transport, financial contributions*

Summary of feedback	Example comments and feedback (see Appendix 2 for full details)	Further considerations and recommendations
<p style="text-align: center;">PROPOSAL SEVEN</p> <p>Agree – 20% Disagree – 46% Not sure – 34%</p>	<p>“A fair adjustment. Would encourage parents to push for independence in instances where travel provision has become habit rather than necessity.”</p> <p>“This is a sensible thing to do.”</p> <p>“As it is compulsory to be in full time education or training until 18 the travel costs should be completely covered.”</p> <p>“I disagree with this. If they are required to stay in education until they are 19 and there is not alternative for them, then I do not see why they should have to contribute up to £600 towards the transport.”</p> <p>“I had better start saving for travel now (Y8). That sounds pricey. Individuals that don't have SEN often have part-time jobs at this age to fund their transport, but I can't see that my son will be ready for that.”</p>	<p>The majority of respondents either disagreed or were unsure about the proposal to routinely request a contribution towards travel assistance arrangements for 16 to 18 year olds (Academic Years 12-14). 20% were in favour.</p> <p>As discussed in section 4.2.7 of the report, whilst young people are now required by law to be engaged in education, employment or training up to the age of 19, Local Authorities do not have a statutory duty to provide home to school/college transport free of charge for learners aged 16 to 19 in the same way as they do for primary and secondary aged pupils up to the end of Year 11. Subsidised post-16 transport is, therefore, a discretionary provision.</p> <p>Local Authorities have discretion to determine transport and financial support in their area and must publish their policies on this. A large number of Local Authorities already require a financial contribution.</p> <p>There is no formula or calculation to determine the appropriate levels of this contribution. The £600 proposed (with a 25% reduction for low income families) is an</p>

		<p>approximate average, based on a review of other Local Authorities' charges and also broadly aligns to the cost of a student bus pass in Medway (£620).</p> <p>The imposition of any financial contribution will never be popular but the Council is currently an outlier in terms of not imposing a charge. It is interesting to note that 20% of respondents are in favour.</p> <p>It is therefore recommended that PROPOSAL SEVEN is implemented and included within the Council's refreshed Post-16 transport to education and learning policy.</p> <p>Contributions are required for both mainstream and SEN students in this age cohort so this is not discriminatory. The value of the contribution will not exceed the cost of a Medway student bus pass and therefore no young person will be financially disadvantaged if their EHCP identifies an education setting further afield. A reduced contribution rate (-25%) will be agreed for low income families.</p>
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8. Implications for Looked After Children

- 8.1 For looked after children placed out-of-authority the Inter-Authority Recoupment Regulations provide that, for children with SEN statements, the local authority to which the child is in care must pay to the providing authority (i.e. the authority maintaining the statement of SEN) such amounts as the authorities agree or such amount as the Secretary of State directs. This will generally mean that all the costs of the statement will be covered, including the costs of home/school transport where the statement provides that the local authority will pay for it.
- 8.2 Where the statement does not cover transport or where the placing authority, as corporate parent expresses a preference for a school further away and beyond reasonable walking distance, then the placing authority (as 'parent') will still be financially responsible for the transport.
- 8.3 Medway Council is, therefore, generally responsible for facilitating Home to School Transport for Looked After Children under the care of other Local Authorities and placed in Medway in line with their needs and eligibility. The SEN Travel Assistance Team will negotiate arrangements through our framework contractors and/or the child's placement in line with the identified needs of the young person. The placing Authority will be recharged for the full cost of these arrangements.
- 8.4 Similar arrangements will apply for Medway Looked After Children placed in other Local Authorities. There is, therefore, no risk of Looked After Children receiving provision of a lesser quality to their peers.

9. Financial implications

- 9.1 The financial implications are discussed in Sections 1 and 2 of this report 'Budget and Policy Framework' and 'Background'.
- 9.2 Meeting its statutory duty is putting increasing pressure on the Council budget as the number of eligible children requiring travel assistance, the complexity of their needs and the cost of providing travel assistance increases.
- 9.3 It is therefore important that the Council works closely with parents, carers, schools and transport operators in the coming years to provide the best possible value for money in providing this support.
- 9.4 The proposals that have been consulted on are focussed on making the service more operationally efficient and flexible, whilst ensuring that the Council continues to meet its statutory obligations in a fair and transparent way. The emphasis is on working with parents to support their children to access appropriate education and, within the boundaries of what is practical and achievable, to support them towards greater travel independence.

10. Legal implications

- 10.1 The Education Act 1996 contains the law on school transport. The government has also issued statutory guidance called Home-to-school travel

and transport 2014. Local Authorities must have regard to this when carrying out their duties on home to school travel and transport and sustainable travel.

- 10.2 The Local Authority has an explicit statutory duty to provide home to school transport assistance to children with Special Educational Needs (SEN), to attend their specialist provision, both in and out of borough. There are similar explicit duties across the Children and Young People Services where transport assistance is provided to many children.
- 10.3 The Local Authority is statutorily required to ensure that children with a statement of Special Educational Needs (SEN) receive education that is appropriate and compliant with that set out in the child's statement-In accordance with Sections 312-349 of the Education Act 1996 (as amended).
- 10.4 The Local Authority is obliged to have regard to parental preference for a child to be educated in either specialist or mainstream provision when supplying SEN provision – Special Educational Needs and Disability Act 2001.
- 10.5 The Local Authority when dealing with children with Special Educational Needs must have regard to the Secretary of State's published Code of Practice and must not promulgate transport policies that seek to limit parental choice.
- 10.6 Under section 508A of the Education Act 1996 local authorities must also promote the use of sustainable travel and transport for all children and young people of compulsory school age who travel to receive education in the local authority's area.
- 10.7 Under section 508B and Schedule 35B of the Education Act 1996 local authorities are under a duty to provide free school transport to "eligible children".
- 10.8 The SEN Code of Practice 2001, paragraphs 8:87- 8:90 sets out the considerations for transport for a child with a Statement of SEN. The SEN and Disability Code of Practice 2015 sets out the considerations for a child with an EHCP.
- 10.9 If the parents' preferred school is further away from the child's home than another school that can meet the child's special educational needs the local authority can name the nearer school if that would be compatible with the efficient use of resources. Alternatively, the local authority can name the parents' preferred school with the condition that the parents agree to meet the full transport cost.
- 10.10 Where the local authority names a residential placement at some distance from the parents' home and the local authority, the local authority should provide transport or travel assistance (such as reimbursement of public transport and car mileage will be at the discretion of the local authority).
- 10.11 In exceptional cases where a child has particular transport needs this will be set out in Part 6 of the Statement of SEN or set out in the child's EHCP.
- 10.12 The Local Offer must contain information about arrangements for transport (including for young people up to the age of 25 with an EHCP) including

specific arrangements for specialised transport. Transport costs may be provided as part of a Personal Budget where it is agreed and contained in the EHCP.

10.13 Since June 2013 young people are required to stay in education or training for a further year after compulsory school leaving age, and this extended to the age of 18 from June 2015. The government has issued statutory guidance on Post-16 transport to education and training 2014 which local authorities must have regard to when carrying out their responsibilities.

10.14 Local authorities have discretion to determine transport and financial support in their area and must publish their policies on this.

10.15 In summary, all proposed amendments and clarifications are legal and in line with the Council's statutory obligations, provided such proposals are implemented through a clear and transparent process.

10.16 The report is within the remit of the Committee to comment and recommend to the Cabinet for decision.

11. Recommendations

11.1 The Committee is asked to:

- a) Consider and comment on the proposals to revise the existing Home to School Transport Policy and the outcome of the consultation set out in sections 6 and 7 of the report; and
- b) Recommend the proposed 'Education Travel Assistance Policy', set out at Appendix 3 of the report to the Cabinet for approval at its meeting on 10 April 2018.

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Appendices:

Appendix 1 – Verbatim Responses to consultation questionnaire
Appendix 2 – Record of Meeting Medway Parents and Carers Forum (MPCF) Coffee morning
Appendix 3 – Revised Education Travel Assistance Policy
Appendix 4 – Existing Home to School Transport Policy (April 2017)
Appendix 5 – Summary of Proposed Changes
Appendix 6 – Diversity Impact Assessment

Background Papers

Cabinet Agenda and Record or Decisions - 21 November 2018

<https://democracy.medway.gov.uk/ieListDocuments.aspx?CId=115&MId=3699>

Appendix 1 – Verbatim Responses to consultation questionnaire

(Please note that all responses are taken directly from the questionnaires and are unedited)

Proposal One - Definition of Education Travel Assistance

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	Because it is travel assistance
Agree	Don't think this really matters.
Agree	Easier to remember and say.
Agree	Fair representation and removes the label of SEN. Previous question not answered re mode of current transport as child not in school currently but awaiting placement either through ehcp or inclusions team.
Agree	It gives a wider range of transport to education
Agree	It gives the option of different methods/means of providing transport as each child/family has different needs.
Agree	It seems like a title that describes the what the Policy is.
Agree	it's a name change intended to reflect the reality...
Agree	It's making it clear that there are a variety, which makes options for families.
Agree	Its only a name and may allow more flexibility
Agree	It's shorter and gets to the point.
Agree	Kids with walking difficulties and educational needs should all be entitled to some form of transport to school if parent does not drive or have their own vehicle
Agree	Policy is not only applicable to schools. Travel Assistance can be given in various forms.
Agree	Providing the services are not affected - why should a name change effect it
Agree	Reflects the flexibility that Medway recognises is necessary.
Agree	The name change doesn't affect the process of the travel
Agree	The name of the policy in itself is not as important as whether or not the service continues to meet the needs of the children
Agree	The new wording is correct and precise as this is an assistance for travel to be successful for SEN pupils
Agree	This will give more options for transport for pupils.

Disagree	"Home to School Transport Policy" is a necessity to many children/parents/carers. Changing the name is, in my opinion, a precursor for trying to introduce drop off and collection points, or getting people transferred over to a "travel allowance", and claiming that the council is no longer responsible for providing transport to and from home.
Disagree	A change of name from Transport Policy to Transport Assistance implies levels of support may be decreased. Pupils with severe and profound disabilities require transport provision. Pupils with high levels of need do not attend their local school and therefore may have long journeys across Medway to access their education each day.
Disagree	A parent with sen children would want nothing more than their children to use public transport. Most kids wouldn't get to school if using by themselves. Using a mini bus gives them their independence in a safe environment, taking this away would create more issues for their mental health which will impact on their learning ability and education.
Disagree	Amending the way families access transport basically means cut backs l'm my opinion
Disagree	At the moment the title reflects reality in that only home to school and vice versa is considered. The new title could be taken to mean transport to or from other locations, such as childcare, which I doubt you are offering.
Disagree	Because of his needs he is not able to travel independently. I also have a daughter with additional needs in a main stream school in a different area it's not practical to take him myself.
Disagree	Both the phrases make no different. Even with the first option, you can still include the various was that you are referring to.
Disagree	Children too vulnerable for independent travel. Many schools are quite a distance and would not be reached without change of bus/train.
Disagree	Home to School policy suggests a concrete statement in that our teenage son has transport to and from school from our house. Education travel assistance suggests a less concrete statement. This is highlighted from reading the council minutes of proposals to possible changes to our son's travel needs to and from school up to age 19.
Disagree	Home to school transport should have a distinct policy separate from other travel assistance policies.
Disagree	I don't see the need to change the name, however it happens, the child is still being transported to school
Disagree	I don't see the need to change the name.
Disagree	I don't think changing the name would change anything the current name home to school is exactly what it is there is nothing educational about it.
Disagree	I think it allows scope for the council to offer more vague and possibly unsuitable assistance
Disagree	I think the idea of suggesting bus transport for vulnerable or needy SEN children is ridiculous as the support of the responsible adult/s is vital and in the case of my son who has CP and profound deafness unthinkable. He would need the adult support.
Disagree	It downgrades the reason why children need it. If the transport is not there, they will not be able to go to school. Assistance sounds like not everyone would receive it
Disagree	It much more clear to call it home to school then education travel assistance policy that can mean a hundred and one things.

Disagree	Its sounds like children and parents are going to be forced to change the current travel provision
Disagree	My immediate assumption would be that direct provision of transport might be replaced by some kind of voucher system which would rely on parents having to rely on public transport that may not be appropriate.
Disagree	my son is not capable of travelling independently
Disagree	Not all children can travel safely or on there own to school.
Disagree	Pointless exercise, when they should be dealing with far more important issues than a name change
Disagree	Pointless waste of time
Disagree	Suggests that it won't be funded which is the national standard to ensure an individual child is able to access the correct provision for them
Disagree	The autistic spectrum covers a large variety of needs. Transport should be designed with the need of the child paramount
Disagree	The current name is the clearest description of the service provided. It does not imply that the service is free. It seems to me that the new name is an attempt to move away from the legal obligation to provide transport for certain pupils and/ or pupils who live at a certain distances. It is disingenuous and should not be adopted.
Disagree	The original name describes the 'product'. I don't wish to have 'assistance' to provide the method. I'd like a service provided.
Disagree	The SEN policy should be separate from mainstream school as they are especially vulnerable.
Disagree	The word 'assistance' implies that the council will not provide total travel provision for children and young adults with special educational needs to attend their educational institution, which is the councils legal obligation.
Disagree	We disagree vehemently with this as the costs involved would be better used to support transport of children.
Disagree	Why are these changes being made ? Plus how will this effect my son ?
Disagree	Why are these changes being made? Plus how will this affect my son?
Disagree	Why has the name got to be changed, how will this affect my child who already accesses home to school transport
Disagree	Why has the name got to be changed? How will this affect my child who already accesses home to school transport?
Disagree	your justification is that the current name indicates the use of a taxi or bus ? Home to school does not indicate this in fact it suggests only home to school so cant see why Education Travel Assistance is telling me its a variety of transport ? Think your getting caught up in a name rather than focusing on the actual delivery of service.
Not Sure	All children have different level of needs that require different levels of support. I can only comment on my Childs needs.
Not Sure	As long as my Daughters travel needs to her school continues and not be affected we do not mind what the service is called.
Not Sure	As long as what is supposed to be provides seats the same, is there any need to change the title
Not Sure	As this may incur a change of printed which would be a total waste of money. The service will still have good and bad points this would not change

Not Sure	Because most children are use to routine and if there is change not providing same means of transport might be disruptive to them.
Not Sure	Changing the name doesn't make things better
Not Sure	Does it matter what you call it?
Not Sure	Doesn't really matter what it is called as long as it continues to supply school transport.
Not Sure	don't have a preference
Not Sure	For parents & carers who do not have their own vehicle or one they are free to share - drive they have almost no really good choice for the child/ children they are caring for to have transport to and from a special needs school, which may often be far away - too far away every day on public transport, or walk as is often another place further away.
Not Sure	For parents like me I have a child who goes to Danecourt another two that go to Chatham I know my son with special needs wouldn't keep his belt in and struggled to stay in his seat kicking him off Medway Norse meant I now I have to take him myself which means I'm late taking my other two and picking no them up it's not fair putting pressure on me as well as the school on my back My question is can extra measures be put in place for those children that get out of belts
Not Sure	I am not quite sure of what you mean by bus or taxi. Is it public transport bus and what type of taxi are you talking about. A registered taxi use for children transport is fine by me with a properly checked for DBS
Not Sure	i cannot include any suggestion that makes it harder for parents to get they children to school or anything that we consider to be unsafe for our children
Not Sure	i don't believe the name of the service is relevant. surely, the service itself, is the important factor.
Not Sure	I don't know exactly how things will change for son
Not Sure	I don't think the name makes much difference as long as the provision does what it should.
Not Sure	I feel that what the policy is called is quite irrelevant. As long as everyone who needs help receives it.
Not Sure	I have chosen this answer because I am not sure what the change in name will mean in terms of Medway council providing assistance to parents/carers for special needs students/pupils.
Not Sure	I think I would like to know more about the criteria that would be set ie would the distance be changed, if the parent/carer doesn't drive etc. A change to the provision of transport we currently receive for our child could have negative impacts on both the family and the child.
Not Sure	If there is not a waste of money in replacing, signs, stationary etc There are already enough cutbacks
Not Sure	I'm quite new to this but we have home to school transport on a temporary basis because that's what they had offered us but we need to extend it as my child is unable to use public transport at this time
Not Sure	It also reflects that the travel assistance is not just available between home and school but between educational placement establishments (eg college/work placement) and places the young person may go to after school such as minders/respite. If this 7 not the intention it could be misleading

Not Sure	Not sure of the need for this, or the expense
Not Sure	Not sure will it make provision any better? Or just a name change
Not Sure	The current name is clear and appropriate for all ages groups/ abilities to understand. Why change it?
Not Sure	The name is not so important. The fact the children needs and family needs are being met.
Not Sure	Transport or travel assistance are the same thing.

Proposal Two - Annual Application and Review Process

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	A cost effective strategy to review yearly. And gives carers the opportunity to stay or leave depending on their situations
Agree	Changes to circumstances during the period of allowance can affect eligibility
Agree	Development and medical needs can change and should probably assessed yearly.
Agree	I agree that the needs of the students may change and for those who may be more independent, it is right that they are encouraged to be as independent as possible. Assessing whether someone still required a these level of service on my option is fair.
Agree	I also think that each child should be assessed as a person and not just a name on paper.
Agree	I do agree that it should be reviewed however I think it shouldn't go on how well the child is doing in school should be the only thing taken into account as some children act differently in different places
Agree	I have seen many children have their transport taken away even though their circumstances have not changed. This is not fair to anybody involved. On the other hand there will be people abusing the system.
Agree	I think if my son was offered a one to one things would have been different he may not have been kicked off Medway Norse
Agree	I think this is a good idea, as it allows more accurate collection of data. Thereby sourcing the right transport for the pupil, be it at a higher or lower cost
Agree	I think this sounds okay I'd prefer to hear more about it face and face though.
Agree	Important for all concerned to have up to date information
Agree	It's important to review each child's needs yearly. It is also important we help every child to be the best they can, as independent as they can be, but to also keep their best welfare interests at the highest level for them.
Agree	It's providing room for progression and change, then and for their future to encourage and teach independence.
Agree	My agreement is subject to providing a full review and justifications of any changes to the travel assistance arrangements and no erroneous judgement is made through simple only application and review process that you are referring to
Agree	Once there is a plan in place for the child's transport system and it is designed flexible for parent to request for a change if needed, I think that is fine.
Agree	Online applications are better and easier.
Agree	Promotion of independence is key to assisting children become adults and being able to assess travel arrangements yearly gives the child and parents options to change (or stay the same).
Agree	Should be easy to manage and ensures that changing needs can be taken into account.

Agree	Taking personal circumstances into account is helpful and not treating every person or family as one size fits all approach
Agree	There should be many reasons why pupils that have a sen should have home to school transport and every pupil should be assessed individually because the individual needs they have
Agree	Things can change be it a move of home or something else . An online Form needs to be a quick a easy checklist
Agree	This can help speed up the process.
Agree	This does seem like a good idea, as situations can change over time although the applications should be looked at on a case to case basis as everyone is different. And the application should not be too complicated and long winded.
Disagree	A child has an annual EHCP review - all aspects of the child's needs are discussed at this meeting. - the transport should be part of this. Parents should not have to go through yet more assessments. It would be the appropriate time to discuss this and it would not disrupt a child's routine. Child can have seizures, hurt themselves or others if their routine is changed and a further assessment would be an example of this. A child's well being would need to be taken into account when trying to deciding what is best and putting this at risk is highly inappropriate for a cost cutting exercise.
Disagree	A review should take place whenever a young person or their families need it . Some may not need a review annual
Disagree	A set form may not ask the relevant questions.
Disagree	Any change of in the needs of a student is always discussed in the Annual Review. There is absolutely no need to create more work for the Medway Council employees in processing the online review form.
Disagree	Any decisions regarding a child becoming older and them learning the skills needed for adulthood should be a part of their EHC Plan and if a change is needed then applications should be made and changes made in the EHC Plan
Disagree	As a parent of 2 extra special children, I have enough to do without having to fill out annual forms in addition to everything else. Our children have their annual education health and care plans, should transport not be on this. Not all parents of special needs children will be comfortable completing online forms. Why would the form be submitted in September? one of the issues with the current transport is that you only hear a day or 2 days before your children go back to school in September. Parents worry all the summer holidays about their children transport, our children need to know in advance who will be taking them so that the transition goes as best as it can.
Disagree	As a working parent of a disabled child I do not have time to fill in forms. If I need to tell you of any changes I will do. I do not want to be forced to fill in needless forms
Disagree	As it sounds like you are trying to get out of providing transport for the children and the majority of SEN kids are vilnerable
Disagree	As parents of special needs kids we are constantly filling in forms and assessments, this will just add another to an already long list! Parents always have the option of getting in touch if they have an issue with the current arrangements surely?
Disagree	because it should already be reviewed at the annual review of the EHCP. Some parents will fail to reapply for whatever reason; if the child is entitled to assistance it should be provided until it is determined that they no longer need it. That is their legal right. Legislation does not give you the power to cease to provide it because the parent hasn't repeated the application process.

Disagree	Care's of individuals at special needs school need to have certainties regarding the safe transport of there sons or daughters. These proposals appear to be taking away these safeguards to there children. In particular drop off points, which means carers will have to make arrangements (if having other children) or are working and rely on there families and friends to be at home address for child to be dropped off. To suggest drop off points would make arranging for this far more difficult and demanding on the carers (family, friends) Carers of individuals with special need support and need to feel supported. They are under enormous demands by caring for there children. Talking about financial burden of travel does not feel supported. Cares have to sacrifice there financial potential to care for there children and to make them suffer more financial burden is not the answer.
Disagree	children with sen are not often capable of being independent , not saying all but most i certainly wouldn't put my son on a bus independently on his own not even a question
Disagree	contacted Joe in the department raising an issue regarding the shared transport effective before Christmas. We had overslept, very unusually and the taxi had turned up 30 minutes prior to usual time, It stressed my Daughter massively and the other pupil had been dropped off outside at a school because the parent had to go to a meeting. It caused me great concern as I speak as a concerned mother that my child s vulnerabilities and complex needs would have meant I would have never been able to have left her waiting outside to be collected. I am not aware of the other pupils issues, but it left me feeling concerned and the reason I raised this issue with Joe who told me to email you.
Disagree	Does this affect children in special needs settings? Surely they should have their arrangements rolled forward until they leave education
Disagree	Does this affect children in special needs settings? Surely they should have their arrangements rolled forward until they leave school.
Disagree	each case should be on its own merits. If circumstances change or medical needs change they should be addressed at any time, not just once a year, which will pile on work at one particular time of year and may cause delays.
Disagree	emphasis on parents to chase, school could raise possible ability changes at review that the education dept NEVER attend.
Disagree	Every year my child has an annual review at Abbey court school and this includes a review of her transport and whether there are any issues around this. I do not think it is necessary to go through another assessment on top of all of the other assessments we need to complete. Have you any idea how many appointments we have each week for various assessments, let alone DLA forms, blue badge forms, various other forms we need to go through again and again. All whilst trying to hold down jobs and provide the care for our children that they require and deserve (much more than other children require). A SIMPLE SOLUTION IS FOR YOU TO LIASE WITH THE SCHOOLS TO SHARE THIS INFORMATION FROM THE REVIEW, THERE IS ALREADY A CONSENT PROCESS IN PLACE FOR SCHOOL TO SHARE INFORMATION WITH RELEVANT PROFESSIONALS SO PLEASE STOP MAKING EXTRA WORK FOR US AND YOURSELVES.
Disagree	For the parents of pupils with severe and profound disabilities this would be inappropriate. The pupils have life long diagnosis and the level of need will not alter on a yearly basis. The parents of these pupils have a lot of stresses in caring for these children and do not need more pressure in applying for transport provision.
Disagree	Generally speaking if the children are going to a school that deals with children that have sever or complex needs then they are not

	going to change that greatly over time so constant re assessment to say the same thing year on year about a child is a waste of time and if there are changes parents will generally inform those that need to know.
Disagree	I believe if there was a change of circumstances, particularly medical conditions that impacted on transport needs parents would notify the authority. The added stress of annually applying for transport is unhelpful to families and the additional administration of such a system is not an efficient use of resources.
Disagree	I do not understand why this is not formally recorded and arranged for EHCP why create another form for an already stressed out parent to deal with. COMMUNICATE BETWEEN DEPARTMENTS
Disagree	I don't think this is an option for me / our family. We have enough fighting and forms to fill out continuously and travel will always be needed as long as my child is in education. If there are substantial changes in circumstances such as change of address etc then I can understand you may have to apply again.
Disagree	If a child is diagnosed as special educational needs when they are born or when they start school, I believe the child will need assistance/support throughout their life. While I understand that children develop, it would be dangerous for someone in an office to decide following a review that a child should not get assistance/support with getting to school.
Disagree	It is already formalised in the school EHCP/statement annual review process. I see no reason to make parents/carers, who already have more than enough form-filling to do, fill out a new application every year.
Disagree	It is unlikely that there is going to be significant changes year on year so it would make sense to rationalise and review each key stage
Disagree	It seems to me the council are putting disadvantaged children at risk in order to save money, only a parent And the school should be allowed to decide if and when a child is independent enough to change the travel arrangements. Not somebody who works for the council and has little to no understanding of the impact that change could have on the child.
Disagree	Just another thing to add to a sen parents annual review. I'm sure if parents think their children can access public transport they would inform yourselves.
Disagree	More paperwork is NOT what SEN parents need - a simple phone call to check for changes in circumstances would be a better use of parents time and reduce the headache for parents.
Disagree	My son is at the moment unable to travel by himself as he has no safety awareness so travelling by himself is out of the question
Disagree	Not ever one has access to online services
Disagree	Our son is in Year nine and nowhere near ready to travel alone. There are also no bus routes from out area to his school. Public transport is not an option for us.
Disagree	School already have details of child's individual needs. Medway council to liaise with school initially then parents at annual review or parents evening
Disagree	SEN Transport should always be automatically offered to our SEN children in my opinion, especially when there are siblings at different schools. Our children vulnerability and safety needs remain paramount. Although they are older they are often younger in mind. A parent could always come forward to say if a simple yes or no if the transport is needed or not.

Disagree	The added pressure on parents needs to be more supportive. Every two years is better.
Disagree	The annual EHCP review already looks at transport arrangements and reviews any need for change. This will just duplicate paperwork and incur extra costs. If necessary any extra information could be included/requested at the review. In the case of pupils who do not have an EHCP then an application may be applicable.
Disagree	The children getting this service with SEN are children with disabilities / complex needs / medical needs that require this home to school service ie special needs schools !
Disagree	The children getting this service with SEN are children with disabilities/ complex needs/ medical needs that requires this home to school service ie special needs school!
Disagree	The child's needs regarding transport are discussed in an annual review at the EHCP meeting. There needs to be better communication between the council and the school regarding the child's needs. Extra paper work in addition to this is not economical in terms of time and money.
Disagree	The decisions around transport needs should be fully explored and discussed at the annual EHCP review. No other process should override this document.
Disagree	These children are special needs and they go to a special needs school, so all the time they go to a special needs school they need help to get there, most of them will never be fully independent adults. My son has had travel assisted help since year 7 his now in year ten his never been out on his own.
Disagree	This is yet another added 'hoop' for parents, carers and their children to have to jump through in order to receive support. Also this is aimed to make it more difficult to receive the support.
Disagree	We already have annual EHCP review which cover this. Please join up your council offices / officers and share the information you already have rather than ask for duplicate information
Disagree	We disagree with this as it is already part of the review process. Those within Medway Council need to communicate between departments (SEN and Transport). It is an additional form which just adds to parental distress, as they have a high number of forms to complete to support their child's development and health.
Disagree	Why add another layer - each child has a social worker and educational plans - so use those regular reviews to agree requirements and that is where independent travel and goals are set so should align with transport arrangements This would mean you collaborating and sorting within your own departments rather than asking parents to do more - much more efficient and aligned to the needs of each child. Parents with special needs children have enough to do or have you not consulted them yet before any proposal . ! A simple online application just adds another layer and process for parents to go through to gain support in line with their children needs. Some will never develop skills to enable them to travel independently so would just need it rolled over every year. For one of my children as I have two with special needs, he travels in a taxi to and from school and will only do this alone and this has not changed , although at school he may go on outings , "his routine" cannot change for morning runs or he will have a meltdown every time.
Disagree	Why not link their needs in with their annual review. Online questionnaires are not always reliable .

Not Sure	A child may seem to be 'coping' with current arrangements and therefore seem confident enough to take the next step to independence. However this is a practiced and learnt method on a predetermined set route any changes would need. Careful planning and time to relieve anxieties
Not Sure	A simple online application annually? Will it be simple and not pages and pages of questions and answers. Will medical details be required which need scanning and sending? This needs to be clarified.
Not Sure	Agree- seems a reasonable way for council to reduce transport costs by being sure of needs each year. Disagree - more forms, more assessment, more staff time and cost to manage responses and more arguments as to whether the proposal is accepted EACH YEAR how about each KEY STAGE in line with (serious) EHCP reviews?
Not Sure	Always families that do the informing/chasing if any changes occur.
Not Sure	how will a child be assessed? Will it be a tick box questionnaire like most things that doesn't give a real picture of how the child copes from day to day and how having to swap from a school transport to public transport would effect them. Will the child's views and opinions be heard because they have the right to say how these changes make them feel!
Not Sure	I agree it's a good idea to keep an eye on the child's progress perhaps yearly , but if help is still needed it must continue..the decision being the parents and school
Not Sure	I can see that there is possibly a need to do this, but there are also a lot of children (my son for one) that have a medical diagnosis that is not going to improve and is disheartening for parents to have to renew this every year knowing that it will never change. Maybe a doctors letter could be given on the initial application so that they are exempt from having to apply every year. (but obviously will have a responsibility to inform the council if their child's condition does improve so that the travel assistance would be effected).
Not Sure	I can see that this seems sensible but I think it would be expensive to administer fairly.
Not Sure	I recognise that for some children with SEN, they will develop independence skills however I'm not confident that this isn't a way of reducing the number of people who can access the service and create more challenges for families needing to appeal etc.
Not Sure	I think it should be every couple of years or including in their EHCP annual review
Not Sure	I understand some students needs may change but for my child his needs will not change so having a roll over is easier for me
Not Sure	If it's a box ticking form, these tend to be cut and dry with their questions and answers and our children don't always fall in to a set yes or no pattern to questions.
Not Sure	If when an older child / children and / or younger person is ready to travel by themselves this is good but still if their school or another place of learning is so far away from where they live it would still be too far away. If it involved 2-3 hours or more on public transport or even further away to walk ; yet many of the young people would need a parent/ carer / guardian with them.
Not Sure	It is reassuring to know that you have transport in place for the future. If you have to re-apply annually on line could you lose your place?
Not Sure	My concerns would be that the process would try to cut down on transport for these children - its just another form filling process to make life unnecessary for those parents whose children travel by transport. Surely if parents wanted independence or any of the

	above for their children that is something that they themselves would be able to make a decision about, not by filling in a form. This all sounds as though there will be cut backs yet again.
Not Sure	My main concern with this proposal is related to timings and dispute resolution: -How much time will be allowed in this decision making process and will this be sufficient for parents and carers to make arrangements --What will be the SLA in terms of responding and notifying parents and carers? -If there is a dispute or disagreement with the decision what will be the resolution process and how independent will it be in terms of representing the best interests of the child. -Will the decision process take into the account the impact on a family which could place further pressures on the council resources
Not Sure	Not all children have conditions that can be explained by ticking boxes online, meaning some cases may not receive the right care package
Not Sure	Not really sure how This will work
Not Sure	Once my son has joined his new school I would like to be assured that travel assistance can be guaranteed for his career at that school as far as possible, reducing the stress of an annual application being declined and him having to move school again just because of transport arrangements.
Not Sure	school and parents meet regularly and there is an annual review to discuss the effectiveness of the school placement to ensure it is still suitable. can a review of the individuals transport needs not be incorporated into this? that way, although the initial assessment is carried out at the beginning of the education setting, the school and parents get a say, if they feel the learner would benefit from travel assistance in another form.
Not Sure	Sounds reasonable but I would worry that the annual review process would be influenced by budgetary pressures
Not Sure	The child's needs are most paramount and things change but I feel that this shouldn't be taken away from a child just because they may not meet the requirements from one year to the next
Not Sure	There is a risk again that criteria may change in between assessments but the personal circumstances of the child/parent/carer do not; again this may lead to issues

Proposal 3 - Personal travel assistance budget (PATB)

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	As long as every child is assessed individually.
Agree	As long as the Childs needs and welfare is put first and each child is accesses just for them.
Agree	As long as the child's needs are the priority
Agree	Cash allowance or PTAP is clearly cheaper for the council... but _sounds like_ the change will be merely to highlight the actual amount of money that would be offered for parents / guardians etc to take on the transport responsibility. Would be completely opposed to forcing parents to taking the cash allowance - some don't have a car etc.
Agree	Each case is different for us its distance and allowing for both of my kids being at school on time at different ends of the Medway towns
Agree	Enables families to make their own arrangements where possible but still allows for shared transport if this is a better option.
Agree	For me, it is not necessarily the cost of taking my child to school, but the fact that I have other children to get to school locally at the same time. It is not possibly for me to be in two places at once and therefore transport was necessary. However this is not in your policy and I struggle to see how you accept this as a legitimate reason? My daughters mainstream school will not be happy to accept her late every morning because I have to travel from Chatham to Strood first to take my son to school. Nor will they be happy to keep her late as I am unable to collect her on time. How do parents get round this? Also if I need to take my son to school every day, this dramatically reduces the number of hours I am available to work and therefore returning to work will be impossible. The Conservative Government are very keen to encourage all parents to return to work but this policy will have a huge impact on parents of disabled children being able to do so.
Agree	Having a Personal Travel Assistance Budget/Cash Allowance will provide a pupil will a better understanding of adulthood and transport preparing them for when the start being more independent and having a responsibility.
Agree	I 100% agree with this. If we would of had this option we would not of had to go through what we did with the transport service. My children have extremely complex needs and a bus was not right place for them especially with people not trained to look after them.
Agree	If it creates more choice and support than good. Currently we receive a cash allowance of £7 a day for a nearly 80 mile a day journey which takes me some 3 hours but at least means my 5 year old is not being picked up at 7am and spending 3-4 hours a day on transport unlike some other 3-4 year olds however this sum does not come close to reimbursing the actual costs.
Agree	In many cases where ad hoc or solo arrangements are required is because there is no reasonable local provision for a child with SEN. In principle I agree with the proposal however care must be taken that the policy is fair and not discriminate against any child and that PTAB is practical, taking into account the family circumstances, especially lone parents.

Agree	It is beneficial to have more than one option on travel arrangements, allowing the parents/carers to assess whether the pupil can become more independent or not and be able to use either indirect or direct support.
Agree	It will be best for a complex child to travel on their own due to safety reasons
Agree	Parents need to have a way of Council paying for kids to get into school if they can't be allowed a school Council minibus pick them up and the travel assistant budget should help with that as parents shouldn't have to use loads of money a week getting them into school with a taxi like I do with my son I pay £30 a day to get my children in to school as I don't drive and public transport is too stressful and complex for them
Agree	Sound like it will give the parents more choice - if this is the case I agree.
Agree	this sounds like a reasonable plan and would make things more practical and efficient
Agree	This would not be suitable for our family but we appreciate that it may suit others. Care needs to be taken that people are not pressured into something because they feel it is the only option if every application is considered for a cash allowance.
Disagree	All students should have a taxi. For example to and from school. Our children need to be ready to catch a bus or use public transportation. It shouldn't be when the council think they should be ready as this will cause unnecessary stress.
Disagree	Cash allowances are a bad idea.
Disagree	Due to the complex needs of my sons anxieties and non verbal communication with people he is unknown with he wouldn't get on any form of public transport. Leading him to be put into dangerous situations.
Disagree	Due to the complex needs of my sons anxieties and non verbal communication with people he wouldn't be able to get on any form of public transport. Leading him to be put into dangerous situations.
Disagree	For "provide greater flexibility for family and carers to make their own arrangements", read "Shift full responsibility for travel arrangements to parents and carers (Who clearly do not have enough on their plates, already)".
Disagree	I don't think the costs implications of this have been properly quantified. For example each cash budget would have to be reviewed and checked at least annually, it would be hard to block buy spaces on mini buses at a discounted rate because the numbers needing the transport would always be uncertain, there would be an impact on school attendance and increased traffic and parking issues around schools.
Disagree	I feel this, again is just making the process more lengthy and complex to deter applications from parents, carers and their children.
Disagree	I think this will add to much confusion and make it the parents/carers responsibility and they have enough to worry about without arranging transport
Disagree	It disadvantages families of children with particular needs which means they need to go to particular schools and may be the only one from their area going. The full cost needs to be covered in order to ensure the child can attend school.
Disagree	My child would not be able to access public transport due to verbal dyspraxia/severe anxiety and lack of spatial awareness (he would get lost very easily)
Disagree	My child would not be able to access public transport due to verbal dyspraxial/ severe anxieties and lack of spatial awareness. He

	would get lost very easily.
Disagree	Not all parent/carers would be able to make their own arrangements.
Disagree	Not interested in any changes where travelling independently as son has no safety awareness
Disagree	Not interested, you've moved the school to the furthest point in Medway from us,
Disagree	Parents should not be expected to interview and DBS check drivers and escorts for their complex children because they need to travel further due to inadequate educational provision locally for those with the greatest need.
Disagree	payments do not reflect the actual costs, inconvenience and creates significant work for parents to manage , again they wish to maximise time with supporting their children, not phoning around, monitoring payments , working out wages just to get a taxi and a companion to help with transport. We don't want to make our own arrangements we want you to provide the service that allows inclusive of our child in society , your just putting the onus on parents and removing yourselves from any real support
Disagree	Personal travel assistance budget might not cover all the cost, parents might not have the shortfall of this money, what happens then? Parents reducing work hours to take children to place of education?
Disagree	Pupils with severe and profound disabilities require transportation to school in a taxi or mini bus, accompanied by an escort. Many parents would not have the ability to manage payments and organise transport to school. Pupils who attend schools that cater for severe and profound disabilities need to travel across Medway to access education. Parents are required to support their children with a range of health and behavioural needs, arranging for transport to school is an added pressure on the family.
Disagree	Special needs children should have the same help to get to school it doesn't matter where they live, it's there needs that are important.
Disagree	This actually confirms my suspicion on question 1. No I don't think a cash voucher is an acceptable alternative. It relies on public transport being in place and/it a private taxi being available. If there are any problems with the transport at present then there is redress thought the council. This would not be the case with a cash allowance. I think this will put an unnecessary added burden on already stretched parents.
Disagree	This does not take account of the individual needs of every child as the spectrum of disabilities is to wide and the approach suggested does not meet with every child's need so provision needs to be made for those that this approach is not suitable for.
Disagree	This passes the headache of arranging transport onto the SEN parents - who have enough logistical issues to deal with already.
Disagree	This will put more pressure on families and less providers of the services people with the biggest most complex needs will have limited access to services. The same system was implemented for holiday clubs and now there is not one that can meet his needs. Don't want to be without school transport as Well!
Disagree	Walking will not be suitable in all weather, poses higher risk for safety ie. running into road, assault Budgets can also be misspent nor do I think it is enough to motivate some parents to take direct action Public transport is also a possibility, however the staff on public transport are probably not suitably trained to deal with the influx of vulnerable SEN pupils. Also it exposes them to the dangers of the public. Also, public transport is not as reliable or direct, increasing journey times and complexity, which will only lead to issues

Disagree	While I understand that Medway Council has to think of cost effective ways to ensure that children and young people with SEN get the assistance they need, will Medway council give enough cash allowance to cover transport costs. I doubt so.
Disagree	Will this new system take into account the child's views on travel arrangements. Will it take into account the families situations where they have other children to get to school. Will every little important detail be looked at rather than looked over.
Disagree	You are proposing this because you know just how difficult it is to find safe, reliable, travel at the right cost. A parent should not have to have this additional burden placed on their shoulders.
Disagree	You say you are trying to be flexible, but the idea of my child (and many that I know), with her level of physical, medical and learning disabilities is ridiculous. Have you ever taken a child with complex physical, medical and learning disabilities who is frightened by people/trains/buses on public transport in a wheelchair? It is cruel and distressing to them and there would not even be enough wheelchair spaces available.
Disagree	You stated in your proposal document that there isn't much availability or competition out there. How are parents going to find transport ? If you cant reduce the costs how will parents ? Do you advertise anywhere ? How will parents be able to check if the driver and escort has been checked. You are adding more pressure to parents that they don't need. I do however think that you don't promote to parents that they can have a cash mileage allowance. I previously had this , but was informed that you would only pay my mileage to the school and not my return journey home ie 4 trips.
Not Sure	The provision should be concerned about what is best for the child. If parents have additional children, can they feasibly be expected to transport disabled children to provisions out of their locality while possibly having to escort siblings to other educational establishments. * We are concerned that the sharing of taxis increases the amount of time that children are on transport which add to their distress and can contribute to health issues, and increases the likelihood that they are late to school and arrive in a distressed state unable to access their learning. * Special consideration will need to be given to primary age children who cognitively may be several years younger than their chronological age for safeguarding and transport.
Not Sure	As long as it was down to family choice and not a forced situation
Not Sure	As with existing direct payments, if the service is not available, there is less choice, and less flexibility (A case in point is the lack of short break provision in Medway). If you are expecting to abdicate responsibility by just giving a payment and then expecting the young person / family to organise getting specialised transport to school, this I think will not be cost effective for the council / tax payer. The buying power of the council should dictate better rates than for an individual to arrange their own specialist provision.
Not Sure	I am not sure because as usual there are no black and white answers only grey. And no doubt the budget you you would pay for travel will most certainly not cover the cost Required for a child to get to school.
Not Sure	I am not sure how easy it is to arrange reliable and continual daily transport so can't comment.
Not Sure	I do not see how a personal budget would help a child with independent travel. I think this could effectively make a huge leap backwards in a Childs development of social skills. Also points need to be raised as to how schools would cope with traffic as not only do our children need transport but the safety that they we handed over to a member of staff. I couldn't drop my daughter outside of

	the gates as many mainstream secondary schools ask. I am sure I am not alone and therefore the schools would then have an influx of parents. This form of transport was offered to me by SEN team however I heard nothing until 2 weeks before school when taxi firm called me. COMMUNICATION BETWEEN EACH OTHER IS CRUCIAL!!!
Not Sure	I don't feel this section is explained all that clearly. My son currently shares transport with a few other children, that works well for him, I would like that to continue.
Not Sure	I got other kids to collect. And am working nights
Not Sure	I would love to be able to drive my son to school but my current working hours and financial constraints do not allow me to do so.
Not Sure	In some cases this may help it depends on other circumstances such as siblings
Not Sure	Individual needs and family situations would need to be discussed. Parents already busy being carers, may not want to be involved in paperwork as couldn't commit the time.
Not Sure	It depends his stringent the criteria is, and if there is a way of making this work for each individual child's needs.
Not Sure	It will all depend on who decides what is most appropriate and the circumstances which are taken into account.
Not Sure	It's a lot if extra work for parents who may already be struggling on a day to day basis, the last thing they need is to have to try and plan transport for their child with SEN when it could of already been sorted for them for their whole school time
Not Sure	Means parent has to organise.
Not Sure	More parent carers would be willing to do this if they got more than 40 pence per mile. cutting costs parents and carers can be paid more per mile and still save the council money. ie 40 pence per mile is not a huge incentive for parents as time and money involved may out way the benefit for them. Also many children may still need an escort in their parents car.
Not Sure	My child would not be able to travel independently but currently the taxis are arriving at different times each day and we do not know who is being collected first. I do not hold the taxi company at fault here . It is dependant on where they live, Where the pupils are attending, Traffic , The pupils do not relate to these changes.
Not Sure	My daughter will start in September and I'm not sure I understand what this means for her.
Not Sure	No I believe that with some special needs children the do need to be restricted when travelling and parents should b given a waiver to sign to to have that choice
Not Sure	Not sure
Not Sure	Not sure this will suit everyone
Not Sure	Parents should not be obliged to take a payment and thus accept responsibility for providing a service which is a statutory duty on the Council.
Not Sure	Shared transport is a good solution, which currently meets my sons needs and we do not wish this to change. I have no wish for him to travel solo to school and understand that this isn't cost effective. it also would not be appropriate for him to travel independently at this time due to his age and needs. School is a considerable distance from home and is not easily accessible via public transport, so a

	cash allowance or budget is still not the answer. I can only speak from our perspective, but our son would need to travel to and from school by car, which isn't always possible - this would put even more strain on families coping with difficult situations daily and we would also be penalised if we cannot get our children to school.
Not Sure	The payment would also need to take into account the need for an escort for example for those with medical needs the driver of a taxi would not be able to easily attend to the young person, challenging behaviour would also be a danger if not escorted. Also the need for specialist transport such as wheelchair lift. Finally the need for drivers/transport to be able to be checked or registered as suitably trained, DBS checked by parents or trained in preparation. All these situations could incur further cost.
Not Sure	There is a certain amount of reassurance that your child is safe and cared for on the school journey. For some children unlicensed transport is a great source of anxiety. For some families, finding someone reliable and consistent to deal with School travel can be a issue.
Not Sure	This may be a good idea for new applicants as it gives them more choice but from my personal reasons the current form of transport is best for my child.
Not Sure	This will be difficult for those parents with other children to get to other school's.
Not Sure	Though for many people the proposal three will be very truly helpful and good for example carers & parents of those with special needs children and or young people who are beyond a few miles away from the place of education or have their own vehicle and drive. For those with no vehicle of their own or cant drive or the school is far away they will still truly need to special school buses for their children.
Not Sure	Travel assistance budget or direct payment are fine but I feel that you need to look at the bigger picture eg parents that are working may find it difficult to fit in taking their child young adult to and from school / college and finding someone else is very expensive and the budget doesn't cover the cost. And is the payment including wear and tear depreciation of the family car.
Not Sure	Unsure of what shared transport means? For us it's not about the money it's about the practicality of getting two children to two different schools that are in two different areas on time. If I could take him I would but it's not practical.
Not Sure	We can only think of our son's needs and it is impossible to think of any other cost effective and appropriate arrangement for his needs other than the current shared transport (SEN mini bus) arrangement as it would be impossible to carry an Autistic / ADHD child under medication for epilepsy by public transport and if we are to hire taxis it will be a huge cost amounting to at least £80.00 per day for two return journeys which will roughly equate to 400.00 a week.
Not Sure	where there are complex needs, if the child receives DLA for mobility, shouldn't this mean they contribute to the transport cost? After all, the payment is made to help with mobility
Not Sure	Whilst this may be applicable/appropriate in a 'tiny' number of cases, the LA should be able to obtain the 'best deals' for a service and keep the lowest number of vehicles on the road at key times.
Not Sure	Would Medway Council tailor transport to individuals. This is paramount

Proposal 3 (Part B) PATB Distance Bandings

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	All parents have a responsibility to get their children to school, so it is only where SEND placements lead to a child being placed further away from home should the allowance be increased.
Agree	I can then choose a taxi firm or taxi driver who will be working directly with me to provide the best care. If not happy I then can change for a different taxi.
Agree	I personally think parent/carers having the disability care for their child should be using this to take that child to school. I appreciate they may well have children in another school, but that is what after school and breakfast club is for. Surely the child's mobility cars should be used to get that child to and from school.
Agree	I think these amounts are fair.
Agree	I think this will help people greatly with getting their children to school and back.
Agree	I'm all for a child being independent but everything has to be done for the safety of the child.
Agree	It gives support to parents who are able to drive their children to school.
Agree	The budget caps are within a reasonable price and will help parents/carers to get the pupil the education they need without worrying about things at home or being late.
Agree	The money amounts are generous and helpful for many people. parent carers and children this will truly help. But some children / young people will still need a school minibus with other familiar children, friendly escorts and a friendly driver if the parents/ carers have no vehicle.
Disagree	£1,000 budget would not last the full school year if child has to be picked up and taken back after appointments/ illness, What happens when the budget is used up?
Disagree	£1000 budget would not last the full school year if child has to be picked up/ taken back after appointments/illness What happens when the budget runs out?
Disagree	3 miles x 4 (there and back twice in a day) x 5 days x 39 weeks = 2340 miles per year => 42p per mile which is less than the HMRC rate for employee use of a vehicle, and makes no allowance for the time cost of the driver. 10 miles x4x5x39 =7800 miles per year => 32p per mile. - even further from the HMRC rate. The cap means that any child travelling more than 35 miles to school will be penalised - if it's the right school for the child to go to then surely distance (rather than travel time) should not be a limiting factor. This shows no allowance for the time cost to the parent. Surely the cost of providing a taxi should be the amount the council offers. Otherwise you are willing to pay for employment costs of a taxi driver but not a parent... that way only pushes parents to keep using taxi's.
Disagree	Again bad idea, your just passing the buck to parents to organise travel which may not get done. Stop trying to change and cap services

	for disabled children
Disagree	As explained earlier taxi cost would be around £400.00 a week. Our son is unable to be taken to school by public transport due to his complex needs.
Disagree	As per my previous answer the cost of taking my child to school is not my problem (although I appreciate it is for some) it is more the case of not being able to be in two places at once.
Disagree	As we have another child to get to school it would not be practical to take him. Public transport is not an option and a taxi would cost far more.
Disagree	As with the previous question the allowance would not cover travel for 1 year.
Disagree	For most the most suitable transport that can be personal flexible and suitable will be a taxi. Two journeys per day, 5 days per week for 36 weeks = 360 journeys. Taking the lowest limit this a payment of £2.77 per journey. Taxi cost roughly 12.50, without extra cost for any escort or specialist vehicle. Annual shortfall to be covered by parents/ carers £3500 pa, this is most of the average annual DLA payment. As parents do not have access to other young people's details arranging transport to pick up two or more young people to share cost will be impossible.
Disagree	For the reasons listed in answer no. 9. Some children also need an escort for medical reasons, ie. seizure or mobility issues. Are you only looking at the financial picture, or are you concerned with the children safety, also?
Disagree	I am not convinced this is going to be effective, it is not just open to abuse, but will add even more stress to those families who are already at their wits end trying to juggle everything as it is and then to be trying to personally manage private taxi's escorts etc if they have to do different school runs for other children.
Disagree	I do not think it is responsible for a public authority to hand out council tax payers' cash without proper monitoring and scrutiny.
Disagree	I don't think that the amounts are enough
Disagree	I think this suggestion leaves things wide open for parents/carers to take advantage of a situation and get transport budgets where they may not be necessary. I think travel budgets should be monitored in the same way that direct payments are.
Disagree	I'm not sure if the costs are reflective as the costs incurred by a family making their own arrangements. In addition to this if there is an increase in the use of APTA it is likely that more cars will be used by parents with many schools not designed to accommodate an increase in vehicles. Many children with SEN requirements also suffer with some form of physical disabilities and need to be dropped off close to school entrance. Therefore in considering this proposal the impact on the school and local community with an increase in motor cars needs to be taken into account.
Disagree	I'm sure it would cost more, at least the children would have supported independence outside the family unit if continued SEN transport
Disagree	irrespective of the amounts proposed for (PTABS), I don't feel that this is the solution - as I have explained in the last question. How can we as parents confirm that the proposed amounts above would be adequate to transport our children to and from school taking into account, distance from home, method of transport needed and in addition, some of our children can find journeys quite

	stressful for a variety of reasons - especially if they don't go to plan. Also, how will these amounts be calculated for each individual family? with all due respect, the people making decisions about the level of additional needs and our family requirements don't know anything about us, our children, or how this will affect our daily lives.
Disagree	Maximum is too low. We travel 100 miles daily to nearest appropriate school, budget does not cover cost
Disagree	Medway Council claim the cost of my sons transport is £40,000 yet would expect me to source and provide it for no more than £5,000, one of these figures is very wrong.
Disagree	My child's school would come under the 3 miles or under, if you use the regular type of measurements, but there are no direct bus services that cover the route he needs to take. Cabs there are back would cost from around £12 a day, £60 a week, this, money would only pay for 16 weeks travel. Where does the other 29 weeks of travel money come from, potentially £1380 short. We can't afford that.
Disagree	Not enough
Disagree	not everyone will be able to afford this me for one just not sure what would happen in this case
Disagree	Not interested.
Disagree	Payments should reflect the costs incurred and should not exceed the accepted mileage rates at which officers are paid.
Disagree	Proposed banding levels are too low.
Disagree	Shouldn't be capped
Disagree	Surely this would cost council more
Disagree	The assistant budget cap will make it hard for the not so well off children family struggle to get them a school, Austic children have meltdown and can always cope with situation that my arise.
Disagree	There will be cost implications for managing and overseeing this strategy.
Disagree	These amounts are likely to be nowhere near what is required to get SEN children to school if parents are having to make their own arrangements (and therefore unable to get volume discounts that councils may be able to arrange).
Disagree	these budgets are too high. For instance, based on 39 weeks a year, 5 days a week - 195 days. That equates to over £5 per day to take a child less than 3 miles to school. Way over the cost of doing so.
Disagree	these do not cover actual costs !!!!!!!!!!!!!!! taking out some of the school holidays - lets say this will cover 40 weeks and use 3.1 to 5 miles That's 1200 divided by 40 weeks = £30 per week DO YOU REALLY BELIEVE YOU CAN GET A TAXI TO AND FROM A LOCATION FIVE MILES AWAY FOR £6 A DAY !! YOU ARE SO FAR FROM GETTING THIS WHOLE THING RIGHT !! EVEN A BUS WOULD COST MORE ! THEN ADD IN THE COST OF A COMPANION THAT WE WOULD HAVE TO EMPLOY AND PAY , SORT OUT THEIR PAY TAX INSURANCE ETC ETC ETC
Disagree	This barely covers the cost of fuel and wear & tear on the car. What about if a family are unable to take their child?
Disagree	This is not clear . is the distance the distance to the school or the total distance travelled by the car? (which will be 4 x as much?) also

	is this as the crow flies or the best route or the shortest road route? also this is below (see for 5 miles * 39 weeks * 5 days) the 45p a mile mileage allowance which in most or if not all cases doesn't fully reimburse total travel costs for a vehicle which include repair, insurance , petrol and MOT. This will also be bad for congestion and air quality at peak travel times. Also how will the CAP be calculated within the bandings? and how will the budget change - I suggest it is linked to an objective measure otherwise it will probably remain frozen for a number of years.
Disagree	This will not cover the cost and children will End up being kept off school
Disagree	This wouldn't work I don't drive , my son won't use public transport as previously stated . Also my son has appointments so this isn't cost effective .
Disagree	This wouldn't work I don't drive. My son won't use public transport as previously stated. Also my son has appointment so this isn't cost effective.
Disagree	Throwing money at it will not help or resolve everything
Disagree	Too confusing and making this payment may lead to people using the money for other things
Disagree	Travel allowances should be available to those who prefer that option, but nobody should have the "choice" forced on them.
Disagree	Will cost much more than that in a private taxi
Disagree	Will the amount increase automatically when public transport increases their fares.
Disagree	You have stated that it costs approx. £4500 to transport a child, but are offering £1k, a taxi would not reduce their fees by this amount. I am also concerned that parents might spend this money on something else and not transport.
Not Sure	Again the proposal needs to be looked at in depth before any consideration.
Not Sure	Although I feel this is a fair payment I do feel this is payment for travel to and throw what about wear and tear on the vehicle.
Not Sure	As I currently do not know what the travel costs for my child are or what they might be if the provision changed in the future it is difficult to know at this time whether these banding would mean the needs of child/parent/carer
Not Sure	As my son has always had a taxi to transport him to school I'm unsure whether I would be happy to organise his transport as I've never done it before but for new applicants it may be a good idea.
Not Sure	Can you send monetary figures with current Home to school transport provision per child and per mileage.
Not Sure	Could work for some however families that have kids like us in 3 different schools it would be impossible
Not Sure	Depends on how often it would be reviewed to keep up with rising costs
Not Sure	Do not think it would cover the cost of petrol. 3 miles twice a day, 5 days a week, 38 weeks a year = 1140 miles.
Not Sure	Every child should have the opportunity to have school transport especially parents on low income and benefits a that have difficulties with the g ilds walking needs like high rate dla shows
Not Sure	Having not used this yet I have know idea of costs of arranging own transport.
Not Sure	How would this be paid?

Not Sure	I am not against some families accessing the personal travel assistance budget, however I speculate about families having to provide evidence of travel expenditure etc as I am confident that the council will not simply hand out money so would this be further forms to complete?
Not Sure	I disagree with
Not Sure	I do not have experience regarding the cost of getting to and from the education provider as my child currently walks but will be falling into the 3.1 to 5 miles bracket next educational year. I had a look at an annual bus pass for an adult (He will be 18 and going to MVA) which shows on line as £670 so in this instance the above would be correct, however if you needed a taxi I assume this would be substantially higher.
Not Sure	I don't know how much taxis cost per annual but I'm sure the 3mile radius that would apply to us us not enough
Not Sure	I don't think this will apply to us
Not Sure	I have no idea how much it would be to pay a driver and escort to take my son to school!
Not Sure	I would agree if this meets costs that are incurred by sorting transport
Not Sure	Individuals being dropped off by parents causes extra congestion on roads and environmental factors. Schools do not have adequate extra safe parking available. Could be a safe guarding issues for children getting in and out of cars.
Not Sure	It is not clear what this amount is based on ? It would be good to understand what Medway feel this is for?
Not Sure	It will assist but will these prices be altered according to inflation
Not Sure	Keep referring to "School". Many children such as my son attend College so I am confused if this proposal is for just school children? Also the Distance Bandings are not given an explanation of how the distance is calculated (Is it as the crow flies or typical road route). This makes the fairness of the bandings impossible to determine, especially for students coming from Hoo Peninsula to the Gillingham area.
Not Sure	My question would be... is it cheaper to allocate the individualised budgets compared to what is already in place?
Not Sure	Not sure
Not Sure	Not sure of distance.
Not Sure	Not sure what the previous allocation was. But in our case a proposed school 6.5mi from home for a taxi would likely cost slightly more per week than is suggested here. On average for 9 months in school the provision would suggest approx £50 per week. I am not sure of the cost for a taxi per day but would think possibly more than £10? Quite often choice of school is limited to provision in the area and the need to travel out of area is something out of the control of parents for this reason possibly contracting a cab firm or similar to provide a service based on set prices would be something to set allocation of funds against? Or indeed contractual sing the whole system may reduce expenditures across the board? Sharing transport where possible and individualism where necessary?
Not Sure	Once again, the child should be at the heart of any decision made.
Not Sure	seems a bit complicated and something else for the parents to manage in an already difficult situation.

Not Sure	This doesn't sound like it would cover the cost of a taxi fare for a year.
Not Sure	This is dependant on the family circumstances. If the family has transport / has a person that has the ability to drop off and pick up from school then this could be acceptable. However this limits the ability to work full time, as often the SEN child travels further to school, because of lack of facilities in Medway, so work time would be limited to 9:30 - 2:30. This could have an impact on other council budgets such as housing (because of unemployment) etc, so in essence could cost the council more on a macro scale. In addition if you have children travelling to school in individual transport this would have an environmental cost with more journeys on the road.
Not Sure	This is dependent on availability of Writetrak tutors and their taken holidays , Meaning the children are placed with other tutors , The furthest my child travels from our home in Rochester is to Seven oaks ,Kent.
Not Sure	This is not adequate. £5 per day for 2.5 miles is not remotely sufficient.
Not Sure	This is not an unreasonable amount however we do 80 miles a day but it is only recognise as 9 miles a day as there is a shorter (but longer) route which I cannot take due to childcare arrangements for my youngest so we will not benefit significantly although it does allow flexibility in terms of making other arrangements.
Not Sure	When it come to individual children travelling on their own arrangement I am not sure of the cost
Not Sure	When your child would never cope on public transport, walking ect then the annual budget would not work

Proposal 4 - Travel training

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	Agrees long as the young people have the mental/ emotional and physical capacity to carry this out effectively
Agree	But in the case of autistic people it needs to be repetitive and one on one.
Agree	great idea
Agree	Having travel training will enable pupils to prepare for adulthood, managing finances and learning what to do in difficult situations. This could help those pupils with mental health issues to have a reduced anxiety level knowing how to cope if a bus is late.
Agree	However need to understand some children including mine forget what they learnt yesterday and need to be supported for long periods of time before they can do this. This needs to be rolled out across all schools not just Sen schools. Mainstream schools also have children on the spectrum who use transport.
Agree	I actually think this would be a wonderful idea, also training within the local buses within Medway. I haven't been on a bus for years, but it would be wonderful if the bus drivers were given training on how to deal with a special needs child.
Agree	I agree provided that pupils are not pressured into independent travel before they are ready.
Agree	I agree we all need to work hard for our children to be the best person they can. personally for me I know my son would find a very busy public bus filled with children a huge struggle. I also know his teachers would 100% agree with me. I do also worry children may become a target for bullies by having an adult with them on a busy bus with more able children. Sadly I know and I've heard stories of transport (public) trouble with bullies. How would you deal with that?
Agree	I think it is a great idea as I would like to see my child learn these important skills
Agree	I think it is a wonderful suggestion to empower those who can
Agree	I think this should be optional as each case is different and I would not be happy for my child (aged 12) to be travelling on public transport on his own at present. It is important that children become streetwise but at the correct age for their individual abilities and the area that they need to travel in.
Agree	if a school and parent agree that this is a route which should be explored for the individual in question, then this is a great idea. having said that, there needs to be a strict process in place to ensure that the individual would cope with this type of training. with this in mind, it would not suit everyone with additional needs and would need to have the flexibility, to be stopped or extended to provide further training/support if the individual requires it.
Agree	If this goes with the child's developmental needs
Agree	My child already receives this at school

Agree	My daughter doesn't have a lot of life skills and would like her to learn new skills , she's reliant on me for lots of things .
Agree	My son has speech issues and processing issues so teaching him these skills would be perfect. I, myself have tried but been unsuccessful. I think others would gain greatly with this support too.
Agree	Sound like this would suit my son so I would be interested but would need more information when considering it such as is there a lower age limit, would they have someone with them?
Agree	Sounds like a good idea at first.
Agree	the people involved in this need to have an awareness of the children/young persons disabilities, DBS Certificates and know the importance of what they are teaching each individual as they will be using these skills as part of their everyday life
Agree	This is a great idea. When my children reach an age where they can become independent I would not like to restrict them in any way or let them think they were not able to do things
Agree	This is a key life skill and is important to increase children independence.
Agree	This is very important for any child that is able too, to have their independence.
Agree	This may be a good idea
Agree	This one is a good idea provided it is executed and owned by you and not the parents to apply for arrange etc , build into the individuals educational plan, link into their work experience , get schools to travel on public transport not use their own mini buses. remember parents have enough to do helping their children and home but I do appreciate they can support this and build upon the training at weekends or when travel allows . no good if you have to take the whole family as you cant leave them at home alone so consider costs
Agree	This sounds like a great idea as long as the individuals are not pushed into this before they are ready, or just because they have had training this means they must now travel independently.
Agree	This will encourage individual to be more independent and part of the society.
Agree	Though the child / and / children, young people got to be far enough in their development to be ready for this. By the way I am trying to help my youngest child who is 17, autistic with global development delay with everyday things including those you mentioned in the proposal four. Yet I know as do many parents I / they have to watch over those we are looking after to help them be safe - but with freedom and independence.
Agree	Travel Training is essential for increasing SEN young people's independence and safety. I strongly support identifying suitable candidates for this training as I believe this is exactly what my son would need to be able to travel on public transport.
Disagree	At my sons school my son attends (Bradfield Academy) they do travel training , but not until year 14. So my son isn't there yet and wouldn't cope .
Disagree	At my sons school my son attends (Bradfields Academy) they do travel training but not until Year 14. So my son isn't;t there yet and wouldn't cope.
Disagree	I agree in principal that travel training is a good idea, but it is not the magic bullet that I think you are hopping it is to solve your budget

	issues. SEN Schools already conduct training with their pupils when they feel it is appropriate, but this is with a view of help them in later life, not to get to school. As previously said, many students live considerable distances from the schools as there are not many in Medway with specialist provision. As a result the travel times on public transport would be considerable and would often require changes. The children would probably arrive not ready to learn and this could have a detrimental effect on their entire outcomes. I would suggest that you liase with schools about the current provision and how the council could support this.
Disagree	I do not think this is the role of the council, or relevant to the travel to & from school; that time is for most efficient travel in order that the child can learn. Travel training is the role of parents and school.
Disagree	I think a lot of the special schools are already providing these skills and it is also the responsibility of the parents to teach their children these schools where appropriate. I think it is a waste of the council's, already tight, budget.
Disagree	I want children to arrive at school not stressed and tired from their travel training, anything could up set them and put them in a mood where they can't concentrate at school, due to the stress of it all.
Disagree	My son is not ready for this. You don't address what to do if his chron s occurs on the bus. This will cause big level of stresses and then he wouldn't go out or go to college.
Disagree	My teenager cannot speak, or communicate well with others, and is more likely to try and eat money than to try and buy something with it. He will never travel independently. I feel that the "Where families and carers consider this to be appropriate to their needs" part of this statement may be completely overlooked, and that parents/carers will be strongly "encouraged" to do this regardless of whether it is suitable for their child.
Disagree	Only few individuals can achieve independent travel. Majority of children and young adults with special needs will not be able to do independent travel for a very long time.
Disagree	Some children want to travel alone and find themselves in vulnerable situations who deals with the aftermath? NOT MEDWAY COUNCIL. I'm sure if this proposal goes ahead their will be a lot of sen children not attending their place of education.
Disagree	Students with severe and profound disabilities would require a thorough assessment to ensure suitability. High levels of support (around two adults for one pupil) would be required to do this safely. Particularly at busy times of the day, such as, at the beginning and end of the school day.
Disagree	There will be huge costs associated with 'travel training' for the most vulnerable young people - it will be lengthy and time consuming. The special schools provide this in a small way for those students who can benefit from it.
Disagree	This a an incredibly concerning idea and one that shows the heart of the money saving scheme. If the council is looking to source travel training rather than provide transport then this is negligence. The areas that are highlighted / in bullet points should be within a persons EHCP not something that comes from a transport policy!! These are skills that are covered by occupational therapists and specialist schools have assigned OTs - if this was a concern to the child / parents then this would raise this during the annual review. In the SEND and inclusion strategy the council discuss that "children are provided with opportunities to develop resilience and learn to be as independent as possible." A lot of children are unable to judge situations, people, and are in the provisions for a specific reason. If the council fail to provide them with the correct assistance to get home then parents will look to them for immediate answers. If a

	child is unable to judge a dangerous situation and becomes lost or meets a stranger and something terrible happens then the council will have to acknowledge that they have had full awareness of this children history. No amount of travel training will be able to prepare a child with autism how to react - adults with this condition do not know how to regulate their emotions and therefore this is not an achievable task.
Disagree	This is exactly what the council offered my child with complex issues, I've was offered 4 months temporary home to school transport then basically after that my child may be offered training on how to use public transport, it's not that my don't want to use it, my child at present cannot because of her issues she is having to deal with and I don't feel they are looking at individual cases.
Disagree	This is good idea for older children with no complex medical needs however this wouldn't and doesn't need to work for younger children say primary age as how many of us parents would allow our young main stream children to go on public transport on their own? I know I wouldn't so I certainly wouldn't let my special needs child until I thought they were ready
Disagree	This would not be appropriate for my child, it may be for some, but it worries me greatly that the council will generalise things
Disagree	Too many safety issues in our child's case. He needs 24-hour watch. I would say this would suit more children in the mainstream with SEN, like our older son perhaps, but not for our younger son. May work for different children, but there are many risks. I also believe this should be taught by the parent or carer, that know their what their children can cope and understand.
Disagree	Travel training is already part of the curriculum at my sons school, but not until Year 14, which is when they will be 18/19 years old. He will not be ready before then
Disagree	Travel training is already undertaken by staff at the schools via people who know the individual child not complete strangers.
Disagree	Travel training is part of the curriculum at my sons school but not until Year 14 which he will be 18/19 years old - he will not be ready before then.
Disagree	Travel training will cost Medway in terms of sourcing a provider, will take time away from parents + pupils to undertake training, also there should be continuous monitoring of said achieved training. However, I do not disagree that some children may be OK
Disagree	Where do you mention children with significant learning difficulties, who will never be independent.
Disagree	Who do I sue when something goes wrong my son has no concept of time or danger
Disagree	Would have to be evaluated on an individual basis, children with anxieties would find this very challenging. Also ASD children at learning age abilities does not reflect capacity, not mature enough i.e. 15 year old, 7 year old mental age capacity. Not all children are aware of stranger danger.
Disagree	Yes if its 1 bus that is never the case never turn up on time its ok for 17 year olds
Disagree	yes, agreed it's a key life skill however, the vulnerability of the young person and the anxiety levels of working with a stranger (Travel trainer) will make this unworkable for most people!
Not Sure	A set route training is ok but what if Bus cancelled or change of route.
Not Sure	A suitable assessment of young person must be made over several journeys by an unknown assessor to ensure the young person acts in a manner as if they were totally alone. Obstacles and distractions should be incorporated to see how the young person copes with

	them, such as a stranger offering a distraction, trying to entice a vulnerable young person, situations such as having lost their card, missing the bus or the stop etc must be tested rigorously to ensure safety. Has the council considered the risk of having overestimated the individuals abilities and the subsequent consequences for the young person, the family and the council's culpability?
Not Sure	As long as the parents and school have the final say on what travel is best and if the training would be suitable for the individual.
Not Sure	As long it is looked at on a individual case basis as some young people will not be able to cope with public transport issues eg when there is a change to the timetable or the bus is late. Although I understand these a situations that they may/will have to deal with as they get older.
Not Sure	As much as I can see the benefits of this, for us public transport is not an option as there are no bus or train routes from where we live to our sons school.
Not Sure	Depends what your going to use this for, give a kid one day travel training then say they are ok n withdraw travel funding? Nope
Not Sure	Don't know as my daughter is too young to even consider this
Not Sure	Each individual case needs to be reviewed A lot of SEN children would not cope with this
Not Sure	Expense and practicality issues have not been quantified. There would have to a pilot scheme for this I suggest.
Not Sure	I feel that people may be pushed down this route when it is not appropriate for them and the decision would be taken out of parents or carers hands and could be penalised if their decisions do not agree with the councils.
Not Sure	In an ideal world these suggestions would be great and I know my son's school is trying to start this process, but my son can't even go to the shop in the next road on his own, as he cant remember and follow too many instructions. He could be a danger to himself as well as other road users as he runs in panic.
Not Sure	Many children that need to use school transport are not mentally capable to do half the things suggested in this list what may be taught may not always be learnt and go in meaning once the travel training finishes they will fail on their own.
Not Sure	May work for further education students but kids younger its a no go
Not Sure	My daughter really needs an escort.
Not Sure	Not sure how this help our individual circumstance though this may suit some others,
Not Sure	Promoting as much independence in children with special needs is a positive suggestion. The training providers must not be chosen by cost but on ability to provide the best possible training for individuals with special needs. The fact these proposed changes appear to be driven by cost suggests that the lowest provider will get the contract. This is not in the interests of special needs individuals.
Not Sure	Provision would need to be highly skilled, appropriate and sensitive to needs of all.
Not Sure	Since when did it become the local authority responsibility to teach children how to safely use transport? Parents need to take some responsibility for addressing their child needs.
Not Sure	Some kids are not able to cope - one day might be ok but another may not.would be very unsure on this
Not Sure	Some kids can't stand being on public transport its too packed and no place to sit and there walking needs find it hard to walk to there

	destination once they have got off public transport
Not Sure	The key phrase is working in partnership - if that's achieved then Yes it is a good idea but if it forces people into difficult situations in terms of other commitments then no.
Not Sure	This could not apply to my son his disability is too complex and severe!
Not Sure	This does not apply to children who would never be able to cope with travelling on their own.
Not Sure	This may be viable for some SEN children but must NOT be used as an excuse to cut back on proper provision of transport.
Not Sure	This would need to be very closely monitored. Buses trains being late, traffic delays cause a lot of stress for some people with learning difficulties and also change to their routine. We travel to Brighton every Monday and Friday to take out son to college even in the family care he doesn't like being late. This is a long journey 75 miles each way with bad traffic problems every week.
Not Sure	Unable to comment as we are a primary provision.
Not Sure	Who will train those children who have EHCP's but are currently attending mainstream school? The training cost and time needs to be taken into account.
Not Sure	Will probably work well for some kids but my son's needs will mean he is unlikely to ever be able to travel independently .
Not Sure	With my Daughters Mental Health needs, Diagnosis of Autism and social Anxiety, I do not feel confident that the above will be accessed easily for her and it is wrong to assume anyone s child experiencing these issues will be assumed independent.

Proposal 5 - Pick up points

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	As long as there is consultation on this as pick up area would have to be right.
Agree	Depending on the suitability of the points. My daughter currently gets dropped off on a main road by a local school and at times can be quite busy
Agree	I am happy to deliver my son to an appropriate pick up point and collect him from an agreed drop off point.
Agree	I currently have an 1 1/2 hour ride on my minibus ride paid by the council, having this in place could reduce my time on transport and give me more time at home to be social. This could be the same for other pupils.
Agree	I do agree that this is a possibility, but again would depend on where the pick up points are in relation to where people live. there is little point in having school transport pick up point a mile from home, or somewhere that is difficult to get to. who will have the final say that the agreed pick up points are suitable to all on that bus? lots of children with additional needs live by their routines and timings etc are extremely important. I can see potential issues with this suggestion if not dealt with and organised correctly.
Agree	I would love to walk my eldest but distance prevents us from doing that. So a pick up point would be ok depending on distance and Tim No
Agree	Lot safer
Agree	My child has an early pick up, and gone 4pm drop off. He has adjusted to this time now quite well, but I'm sure he would appreciate less time on the bus. Also take into account many parents have now got jobs that fit in with the current times. I for one work term time only but have made sure my hours getting to and or my work fit in with him being collected and dropped off. I also want to teach my child a good work ethic. Changing children times could affect parents working hours that their employers can not change and accommodate. Have you thought about this?
Agree	My son is lucky as his taxi will pick up from our home but if he was at a pick up point and having to wait for any length of time then this suggestion sounds like it would be an improvement.
Agree	So long as the pick up doesn't hinder me taking my other children and takes into account what would happen should it be pouring with rain, sufficient shelter at the location, then I would support this suggestion.
Agree	This makes the overall journey time for some pupils more acceptable and the pick up point will have a specific pick up time which parents and carers can schedule into their routines.
Disagree	As a parent of 3 children, this could prove very difficult. My son sometimes takes 10 minutes to get on his taxi with all his rituals . But for other children it may work.
Disagree	As most children cannot stand and wait without an adult this could be a safeguarding issue.

Disagree	As with most of these proposals, the difficulties are in the details - if a pick up point is more than a few minutes walk from home then it presents a difficulty, if a family has other children at home that can't be left at pick up / drop off time then that's a difficulty. Again the principle of minimising travel time is good, the reality is that it will add stress to most children days. Then what happens if pupils are waiting around for hours (as happened in the storm this week) for a delayed pick up but in the cold and wind??
Disagree	At this time and for the last few years my youngest child has had free & safe minibus travel to and from school. It took him time to feel happy about that. Now he awaits the minibus with the safe & careful and friendly driver escort with happiness feeling safe and OK, knowing he will see me or one of my adult sons in several hours again. Change again risks stressing him.
Disagree	Autistic children would never cope with the waiting that this proposal would invoke. And children with health problems would potentially be waiting out in the cold in winter were this to be implemented, thus putting them at risk, a frankly daft idea.
Disagree	Certainly no pick up points, that's appalling, what happens when transport is late? As it stands at least the vulnerable child is in their safe home.
Disagree	Children with learning difficulties are not that easy to get ready in the morning; to think they are then going to potentially waiting in wet and cold weather is not sensible.
Disagree	Currently I am told that the mini bus will pick up at 7.50, but it arrives by 7.15-7.35. Does this mean I have to drag my family out extra early and wait for an extended period of time because the time given doesn't relate to actual pick up times? I do understand that being on a bus for a long period of time is not ideal, although my son has never complained, I think he enjoys the sight seeing. I wonder if he will instead be waiting with me for the bus to arrive or sitting on the bus for a long period of time stationary, in a public car park waiting for other children that are late/having issues. Also will this pick up and drop off point be in walking distance?
Disagree	Don't know really what to say to this suggestion - apart from DEFINITELY NOT!!
Disagree	Due to my sons vulnerability this is dangerous at this present moment in time. The bus pulls up outside his home and drops him off outside his home. Reasoning home to school. What happens if the vulnerable child is waiting in the pouring rain and the bus is late. My son needs routine as that's how he copes not change.
Disagree	Escorting children to a pick or drop off location can not be suitable for everyone, due to health issues and unnecessarily waiting time for bus to arrival.
Disagree	For families with other young children to get to school this will be disruptive and time consuming. Many children with additional needs simply cannot wait in queues or at pick up points - which will cause additional behavioural problems before and on the bus.
Disagree	For many children with special needs, upsetting their routine can have severe ramifications. If they have always been picked up and dropped off at home, changing this could result in severe physical/mental upset. My child hates his routine upset. He will bite himself and punch himself in the head, and get physically aggressive with me if his school routine is upset.
Disagree	From personal reasons my son would find it hard to be dropped off when normally he is brought home safely. I would worry about his welfare as I may be unable to meet him every day. He is happy to sit in a taxi as the distance travelling is fairly short and he has a kindle to read. I do not think this is a good idea for special education students.

Disagree	Getting a child onto transport is about routine , this is the case for many special needs children , it sometimes is not easy in mornings , getting them up , washing and dressing them feeding them , making sure they have all they need . And that before you go in another room and they undress and put themselves back to bed ! Pick up points just add another layer of problem solving them before getting on transport , being stuck at the side of the road , as won't get out of car !! Again this just seems to benefit others and not the child - the problem is not where they get picked up from the problem is your not sorting out the routes and putting the correct level of budget behind demand . IN THIS DAY AND AGE WE WILL SEE MANY MORE CHILDREN WITH DISABILITY AS WE FIND WAYS TO HELP WITH DISABILITIES AND THESE CHILDREN SURVIVE BIRTH - THAT MEANS DEMAND WILL GO UP - SO START LOOKING AT THE DATA AND THESE RATES AND SECURE THE APPROPRIATE BUDGETS - THESE CHILDREN DO NOT HAVE A VOICE TO ASK FOR HELP you can minimise the time by having the correct number of minibuses out there . if there is a demand there is a business so support local businesses to support yo
Disagree	How would those who don't drive be able to ensure they were here at the allocated time. What about families that have children in other schools? Or those who have more then one child that needs to be at different pick up points?
Disagree	I do not feel that this is a good proposal if parents / carers are unable to get to pick up points on time. This will cause distress to all including driver/escort. Students hanging on in cares/ minibuses waiting for their pick up.
Disagree	I don't think in winter keeping children who are potentially medically vulnerable waiting in a cold car park for a bus to arrive is a good idea, pick up from home is a much better idea!
Disagree	I have a child who runs away due to his autism, has meltdowns, has seizures and I am extremely concerned about having to go to pick up point. I chose the school he is in due to the secure nature of it and having to wait somewhere is very concerning and I do not feel the council will be fulfilling their duty of keeping him safe. Currently my son gets to school on time every day - if you do this then it will be save money. Currently he is happy on the bus and therefore there is evidence that if something happens to him that having to go to pick up point them we will be able to say this is reason. The contractor has never seen a copy of my sons EHCP so therefore why are they making decisions about pick up points when this has the key information inside. Decisions are being made by people who do not have all the information. I hope you invited the MP to this consultation meeting as this is something that he should be aware of.
Disagree	I have never had a problem with how long my child has been on transport. I don't think pick up points will work especially when I have other children I need to get to school and get to work.
Disagree	I think children and parent would feel happy and safer if the pick up points were as near to their home as possible, more stress added to the child's day before it starts if they had to get to a pick up point
Disagree	It's not possible for me daughter. She's got a complex needs
Disagree	It's not practical to have one pick up point it will mean children having to wait in bad weather and if transport is delayed they could get cold and wet. Some parents careers also have to consider other children getting them to school
Disagree	Lots of issues here. Safety at sites, permission to use site, equidistant from all children's locations, payment for mileage for each child to / from pickup point, parents having to be at two places at once (different children at different schools) , environmental impact of all the extra journeys each child makes to / from the pickup point, parking at the pickup point sufficient / safe for parents / carers. In

	addition what happens if one person is late for the pickup, are all children late ? Same for drop off, does the minibus wait ?
Disagree	Many children with SEN needs are also disabled and it may not be practical to use drop off points therefore to have a blanket requirement on the contractor will be difficult to implement and will the contractor be the appropriate person to make that assessment.
Disagree	My son gets picked up before 8am every morning and I have another child to get ready for school so it would be very difficult to get him somewhere else other than what's happening now which is he gets picked up from his home
Disagree	My son is the first to be picked up and the last to be dropped off, so in theory should be a beneficiary of this policy. However I would still rather stick with the current system where all children picked up and dropped off at home. I don't see what the problem is with that.
Disagree	No I do don't agree because it's difficult for some children to even walk or let alone leave the house, if they are bring made made to walk before the taxi will even contemplate picking that child up, the schools may face that child missing school, it has a knock on effect
Disagree	No place is a safe place for an ASD child even after years of explaining road safety my son still struggles to when making decisions on road safety.
Disagree	No way. Continue taking my child to and from school. Full stop.
Disagree	Nope I have to get other children to school n get to work, not hanging around a car park waiting for a taxi to turn up. What is parents don't wait n leave kids hanging around waiting in the early morning in the dark, not safe
Disagree	Not all parents have the luxury of a car. Pick-up points may be difficult to access. Parents often have more than one child travelling to school, how are they expected to be in two places at once. Many children with special needs will not be able to wait safely in a public space with cars moving around them. A special needs school would never herd the children to wait outside for transport, the same must be expected on the journey too school. Are you proposing that the children are to wait outside in torrential rain/snow/heat waves?
Disagree	Not sure how a child can be walked to a pick-up point to save travel time. I am sure the mini bus will do such a walking distance within a minute or two with least impact to the overall journey time and taking a lot of misery away from parents or cares of special needs children.
Disagree	Our child refuses to walk, pointless trying to drag him to a pick up point.
Disagree	Parents with other children can not be in 2 places at once. Would parents need to stay with children until they are picked up, if later time leaving it would affect working parents who are carers.
Disagree	Parents with other children CANNOT be in two places at once
Disagree	Pick up points is a stupid idea would not work what happens if tipping down with rain etc these kids have health issues
Disagree	Relies on parents/carers to be at pickup points - some parents timekeeping is not good. Any delay with a parent not being at said pickup point (on way back from school/ college) will cause unnecessary delays for all students on the shared minibus/taxi. Some children have front door keys so do not rely on parent/carer to be at home.

Disagree	See previous notes about subject. To suggest this 'will potentially benefit pupils by minimising the amount of time they are required to spend sat in transport on the journey to and from school'. This statement reinforces the feeling of carers not feeling supported and particularly by the new proposals to transport.
Disagree	Strongly disagree, this is part of routine and structure. Can also put children, parents and general members of the public in an unsafe situation What happens if bus is late, has an accident, weather is bad, wet, snowing! This will mean these children are in meltdown mode before school has even started
Disagree	The bus does not always gone on time as it is and he starts to,panic, but he is contained in his own home. If he was at a public car park, on his own he could be come panicked and de stressed. What happens when the bus is running late due to an accident or problem with the vehicle, how would he know this. He could wander off if the bus is too late. He goes no where on his own, he has. O friends, finds talking to strangers a a major issue. I would not be happy with this arrangement.
Disagree	The pickup time from home is an estimated time and although arrival is generally, give or take a minute or two, the same time every day as with arrival home, unforeseen circumstances often arise and these times can differentiate by 10, 20, 30 minutes or more. Therefore I do not feel it is appropriate for a child or young adult and families to be waiting at a designated pickup point, especially in inclement weather.
Disagree	There are so many variables I'm not sure how this can work in practice? What consideration is given to parents with other responsibilities? Will this be through agreement or force?
Disagree	This could cause undue stress to the children being taken to wait with a group of children and parents some of whom may be noisy or upset. It may present safety issues for those with complex needs/challenging behaviour, and will be especially difficult for parents/caters with more than one child with SEN, potentially in different schools. Waiting for transport in a car park in heavy rain does not seem an appropriate start to the day for any child.
Disagree	This is a ridiculous concept recommended by people with no idea of what it is like trying to co-ordinate getting their children with different needs to different schools on time and in a manner with which they can function and learn. My child has complex medical, physical and learning disabilities and is in a wheelchair permanently. Her bus can arrive at various times each day depending on traffic ie the midway tunnel and accidents. How on earth do you propose managing this.....is it acceptable to have her freeze/soaking wet etc whilst waiting for a bus.....that I will have already had to have loaded her onto our wheelchair adapted car to travel to.....or risk a bus not waiting whilst I try to get her out of car once bus arrives?? How do you propose to keep children safe?? At the meeting ASDA car park was recommended by council as an option.....children with autism or behaviour problems waiting in a car park for a bus?? Safeguarding issues here anyone?? Please use your common sense. This is not going to save money in the long run and going to cause more cars to be on the road.....do you think it is possible or even safe for parents to 'walk' to these points with their children?? We did not choose to have the choice of school taken away from us, often being far from home, there are so few special needs schools. Parents are often trying to hold down jobs as well as co-ordinate every other service as well as deal with their disabled children's needs so please do not consider such foolish and thoughtless, ignorant and outright ridiculous suggestions as 'pick up points'.
Disagree	This is not appropriate for our pupils who have physical disabilities and complex medical needs and require wheelchairs and walkers to

	be transported with them to school to enable them to participate in educational environment.
Disagree	This is ok if you don't have other children that are school at different locations we cant be at two places at once
Disagree	This is problematic. Some SEN children find it hard to wait in busy places, it will depend upon parents being very quick to let the driver know when the child will not be coming to school, some children are especially vulnerable to cold or heat and the waiting or walking will impact upon the child's wider family.
Disagree	This may not be suitable for all children as some will still require door-to-door transport - I feel this could potentially make it more complicated to plan and provide transport.
Disagree	This option is impossible to do when there are more than one child in the family. I have two sons with special needs in two different special schools in the opposite direction.
Disagree	this seems inappropriate and unnecessary. People may have mobile difficulties, they may have other responsibilities such as other children to prepare for school and cannot afford to spend that time every day in all weathers walking and waiting at a point when the taxi or minibus could do this in far less time. Unless there are very obvious reasons for it it will seem like a backward step designed to make people's lives more difficult for them.
Disagree	This will be unsafe for most children.
Disagree	To support the safety of pupils with severe and profound disabilities, this would be inappropriate. Pupils with medical needs may require a lot of equipment, which parents would not be able to carry, especially if also pushing a wheelchair and supporting siblings. Many of these pupils also have difficulties maintaining their body heat and should not wait outside during inclement weather. Many pupils with severe learning disabilities do not have a sense of danger or an understanding of road safety. They may also have challenging behaviours relating to their diagnosis. Waiting in an open space, such as a car park would be dangerous. For parents of these pupils, they would not be able to stop a teenage pupil running into the road or out of sight.
Disagree	To to my sons vulnerability this is dangerous at this present moment in time . The bus pulls up outside his home and drops him off outside his home . Reasoning home to school. What happens if the vulnerable child is waiting in pouring rain and the bus is late . My son needs routine as that's how he copes not change .
Disagree	What happens if you have more than one child you cant be in two different places at the same time
Disagree	What if I cannot get to said drop off point on time what would happen to my child then?
Disagree	What if I cannot get to said drop off point on time, what would happen to my child then?
Not Sure	Again every case is different & some young people could not cope with this sort of arrangement, also what parking provision would be made for the drop off, and what impact would it have on the other children in the family? eg needing to accompany the SEN child and the possibility of them being late for school as a result
Not Sure	Depends on the individual children and circumstances of the family. Some children can't walk distances or don't take well to change.
Not Sure	Have no experience of this procedure. Don't fee qualified to comment

Not Sure	I agree this is a good idea but in the real world what happens when the vehicle is late due to traffic. I have stood outside as we live in a block of flats waiting for my daughter to be dropped off and waited 35mins to an hour. Drivers cant help traffic but maybe a Sen transport app needs to be made available in which you could track taxi. These also need to be sensible points. No point travelling 10 minutes to a pick up point the vehicle drives right past your house. I do agree it needs to be a safe place and not get the child in the car on the road side for a child with needs a very dangerous decision. Children need structure and routine so pre warning score any changes like driver holiday or putting into another vehicle.
Not Sure	I agree with simplifying routes, however when a parent is present with their child it means that during late running the child is safe. Liaising is easier and also the child is most definitely boarding the vehicle
Not Sure	I understand, but not sure this will fully work. Need to consider people that are late in collecting, children becoming anxious through waiting in turn also delaying everyone, bad weather, parents with siblings at different schools, different people collecting children, and ultimately the safety of each child.
Not Sure	I would find this difficult as a parent of three children of which I would have to take out with me, but have to get the other two ready for school ect.
Not Sure	I'm not sure about this. I don't think this would really help me and my children. Maybe this is suitable for older children.
Not Sure	Its needs to be a safe place to pick up and drop off a child that's getting on a minibus and the time they are on transport needs to be reduced as much as possible as a lot of children find it hard to sit still for too long and get irritable when on transport for too long
Not Sure	Just don't know how this would work! Would rather my child was on a bus in the dry than standing on a street corner in the wet!
Not Sure	Not sure if that would work it depends on the child's needs
Not Sure	Parking issues for parent/carers, What if taxi is late? Children with SEN will need somewhere to wait. Good communication is needed between driver, escort and parent carer.
Not Sure	Think it would need to be trialled locally to identify risks and benefits Not going to be practical if you have other children to consider
Not Sure	This depends on whether parents /carers can allocate time, as many work to support their children.
Not Sure	'to spend sat in transport ' - poor use of English Pick up points, eg bus stops, should be used and parents should be obliged to take the pupil to that point. what happens when the parent fails to attend the point at the end of the day?
Not Sure	We would need to see how this works in practice. A balance would need to be sought so that pickup points are not too far from homes.
Not Sure	Would need to ensure that families with siblings are not disadvantaged - eg. if one child needed to be at one pick up point and a sibling at another. Equally families with one SEND child and siblings needing to be transported by parents to different schools.
Not Sure	Would need to know more on times and locations.

Proposal 6 – Respite

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	A 5 day notice for respite transport is not unreasonable
Agree	Agreed
Agree	But parent that can give 5plus days but the transport fail to do their part over 5 times they have left my child at school after a pre arranged change which has been documented both at school and with respite providers
Agree	Fair enough our son attends dragons and they pick him up themselves
Agree	Flexibility from both sides but on the odd occasion things do happen to prevent a notice period
Agree	However again COMMUNICATION between respite and transport should be able to arrange.
Agree	I agree with funding to parents to drop their own child at respite. It mitigates the need for 5 days notice
Agree	I believe 5 working days notice is adequate to allow planning from both sides. Leaving in brackets that exceptional circumstances will be supported will allow for unplanned circumstances.
Agree	I do think asking for this period is unreasonable, where possible.
Agree	I do think some families need help with this problem
Agree	I feel this is fair and 5 days is still relatively short notice. Perhaps it could be considered that parents needing to arrange very short notice ad-hoc arrangements could be given the opportunity to reclaim transport costs they incur, removing the challenge of having to accommodate requests at short notice or disrupt existing arrangements.
Agree	I think this is a fair and sensible approach
Agree	If in case the transport doesn't agree of sending my child to the respite centre.
Agree	Parents aren't always at home do will need to make other arrangements on how they get to and from school and drop off point after school so the child l'd in safe hands
Agree	Planning things properly is key the 5 day time is short but adequate, if a parent gives less notice it should be their responsibility for not giving notice in time
Agree	Reasonable to think there needs to be advanced notice for changes to respite which is a planned activity
Agree	The service will therefore be cheaper and easier to manage as long as their is flexibility to assist in emergency situations.
Agree	There is no reason why you shouldn't have 5 days notice.
Agree	Think this is a completely reasonable

Agree	This allows for exceptional circumstances and sometimes respite can happen as a result of an emergency.
Agree	This is an amazing idea this would greatly help many family's
Agree	this make sense as far as such short break and respite arrangements are informed to to parents and/or carers sufficiently in advance to enable them to inform the council. Sometime it is difficult to contact the council for such requirements.
Agree	This seems fair
Agree	This seems fair as long as exceptional circumstances are supported.
Agree	This seems reasonable.
Agree	this will cut down work on one off arrangements
Agree	Totally agree with this as five days notice is sufficient. Our respite travel is not provided via the council due to being out of area so we already pay ourselves.
Agree	We feel this is a reasonable proposal.
Agree	When it's possible for parent carers to do this.
Agree	Would work for planned respite but would need a supporting policy for unplanned or emergency respite
Disagree	5 days notice is not a change and implementing this would just add to a parents stress load. Also some children need specialized transport, where are the providers of this service going to come from?if council are not going to provide it. Throwing money at parents isn't the answer if you can't buy the services your child needs!at the present time because council say they can't provide transport for our child he cannot access his respite allocation to the full. What's proposed in no way addresses this.
Disagree	If parents are funding the respite, why would they not fund the transport?
Disagree	Many parents of pupils with high levels of need receive last minute availability respite, following cancellations. In these cases they do not get five days notice themselves. Arranging respite transport would requires parents to potentially have to find a wheelchair accessible vehicle, which do not exist in Medway, other than through the transport providers. They would also need to find an escort who was familiar was the needs of the child and who had a knowledge of Special Educational Needs.
Disagree	Once again you are suggesting that parents bear the burden of responsibility, when they have so much to deal with already. Please check the meaning of the word RESPITE.
Disagree	parents don't always get 5 days notice for the rest bite , or its needed urgently , putting a five day lead time onto this is ridiculous. So if for example my son who has a sleeping disorder has a number of bad nights and I have not been able to sleep , but have to still go to work and hold my family together , I get to resolve this by waiting five days for you to help and take him to respite if I cannot do this myself . WHAT IN FACT ARE YOU ACTUALLY DOING IN THIS POLICY OTHER THAN PASSING THE BUCK ONTO PARENTS AND THROWING LITTLE MONEY
Disagree	Parents don't change travel arrangements unless necessary so the 5 day rule is penalizing those who need to change in emergencies
Disagree	Respite is sometimes needed urgently and if you have to pick your child up from respite to get them to school then it defeats the

	purpose of respite in my opinion.
Disagree	Things can change quickly
Disagree	Though ideally families, loved ones, parents carers would give advance notice. It should not be made as a hard and fast because otherwise people could miss out on some good little breaks that are safe & peace of mind. Example when my youngest child went to Parklands near Gillingham for the first time without me all the relevant people knew and I told the bus driver the morning the day before & then learnt he & the bus company had to get permission.
Not Sure	Again, if the child is in receipt of the mobility aspect of DLA, shouldn't this be being used ?
Not Sure	despite our requests for respite care, we have never yet been granted any (our son is 13) . with this in mind, this is not something that I can comment on.
Not Sure	Does not affect my child as we do not qualify for respite
Not Sure	Doesn't affect our circumstances as never asked for respite.
Not Sure	Doesn't affect our circumstances as do not qualify for respite.
Not Sure	Doesn't effect our circumstances as never asked for respite .
Not Sure	I don't have much intelligence on this so I have no idea.
Not Sure	I have heard of one parent told on the day of their child going to respite. There needs to be better co-ordination with social care.
Not Sure	I have selected Not Sure as this is not applicable to me, but feel the suggestion is fair.
Not Sure	I've never used this so can't comment
Not Sure	Never had respite to think about
Not Sure	No opinion as do not use short breaks.
Not Sure	Not enough respite offered, again looking at the big picture it is impossible to put families with children who have special needs into nice neat little boxes. If only! Each child should be treated as an individual.
Not Sure	Not relevant to my circumstances so can't comment.
Not Sure	Please elaborate on 'exceptional circumstances will be supported' and if this is not accepted does that mean the child/young person will not have the respite which carers valuably need.
Not Sure	Sometimes with children and complex needs you will be able to give notice, if my child is in pain which is on a regular fades, I don't always get time to give notice
Not Sure	This doesn't apply to my children
Not Sure	We already have to give at least 5 days notice for respite travel arrangements. I tried to give SEN transport our respite dates up until the beginning of July, and they told me that they can only take the dates and arrange the transport for the current academic term. Surely, It would make much more sense if Aut Even (overnight respite run by Medway Council) and SEN Transport (also run my Medway Council) conferred and shared information on the children requiring alternative transport arrangements, rather than every

	parent who has a child staying having to contact SEN Transport and arrange it separately. A single point of contact would be more productive time wise, and information wise.
Not Sure	We do not use this service so do not really have an opinion.
Not Sure	We don;t have any respite care.
Not Sure	We don't use this service so unable to comment
Not Sure	We have never been offered a short break. My son can't attend after school clubs or holiday clubsas I would need to make arrangements to get him home from there myself.
Not Sure	You need to be as flexible as possible.

Proposal 7 - Post 16 transport contribution

Do you agree or disagree with this suggestion?	Please say why you think this?
Agree	A fair adjustment. Would encourage parents to push for independence in instances where travel provision has become habit rather than necessity
Agree	Having the above could help Post-16 students access the further education they require if they cannot access it without.
Agree	If support travelling was provided while at college we would be happy to contribute to the costs.
Agree	this is a sensible thing to do
Disagree	Absolutely disgusting!! My mainstream son can have free travel but his SEN brother cant, even though school leaving age has been raised to 18. Total discrimination. And as for the discount we will penalised for my husband working full time but not on a great salary but not low enough to fall into low income bracket!
Disagree	As it is compulsory to be in full time education or training until 18 the travel costs should be completely covered.
Disagree	Because it will rule out the option of college to many children as public transport will make it impossible to access. That is discriminatory, and I would expect better from my LA.
Disagree	Care act 2014 specify that special support should be provided up to 25 years of age and not to 18 years of age as it was specified in care act 1996. Young adults requires a lot more support than children. They have more needs than the days when they were younger. Taking away £600 per year from them, something they cannot replace by working due to disability would impact their further development.
Disagree	Children are now required to stay in school until 18 so it seems unfair that we have to pay for transport. Their needs don't suddenly change when they turn 16 so I think their transport provision should stay the same as pre 16.
Disagree	Children are required to stay in education or training until 18 years of age, this cost would prohibit some young people from attending provisions that best suit their needs. Question is unclear does this only apply to those at college or those attending 6th form at school
Disagree	Children now have to stay in education till the age of 19, so EHCP should include transport funding up till the age of 19.
Disagree	Compulsory education is until 18 and therefore so are the transport needs. Families of children with disabilities are often penalised financially for things that are not their choice. We did not choose to have disabled children, to live in a society that has minimal flexible working options, to have to make choices about living and other children based on the location of services for one child.
Disagree	Education is now required to age 19, the policy should be in line with this and also take into account the eligibility for some to continue to age 25. Where a young person has had transport for their school life and then continues at the same institution (eg continuing on to 6th form in the same school) transport should be continued as before. To reduce single journeys for varying timetables a scheme of safe supervised study/waiting areas could be encouraged/facilitated in colleges (as part of safeguarding policies?) so that several

	students on varying timetables could be transported together.
Disagree	For pupils with severe and profound learning disabilities this would not be appropriate. The pupils would not be able to travel train. Most families would not be able to contribute to fund transport, effecting the pupils access to Further Education. The Education and Health Care Plan is until the age of 25 years and there should be a focus on providing the best provision available for as long as possible in line with the recommendations of the plan.
Disagree	I believe that if a family is disadvantaged, then they should not have roadblocks (at all) providing them access to education that a family across town can afford. It will pigeonhole the child, for life.
Disagree	I disagree with this. If they are required to stay in education until they are 19 and there is not alternative for them, then I do not see why they should have to contribute up to £600 towards the transport.
Disagree	I don't agree with this. I also don't agree that families that go to work, should be penalised in the form of being offered less assistance.
Disagree	I feel that kids with special needs should be able to continue the service as they do at a younger age however if health and mental needs allow them to travel independently they should
Disagree	I find this difficult as I feel transport should be provided as per a pupil's needs. £600 per year is a huge amount for families who often work as they can, but may not be considered as low income. Their income is low by the very nature of not being able to commit to regular and reliable work hours. I think you will have less pupils attending education then, perhaps that is the plan behind such changes?? There is very little choice in any further education placement for a child with disabilities like my daughters. I believe that transport should be provided to let her continue at Abbey Court. You risk pupils not attending and forcing more parents into unemployment if they are to try to take their children to placements themselves as there are very few flexible employers.
Disagree	I had better start saving for travel now (Y8). That sounds pricey. Individuals that don't have SEN often have part-time jobs at this age to fund their transport, but I can't see that my son will be ready for that.
Disagree	I think all children staying in education longer should be celebrated. This seems to be charging them for doing so. College and sixth form should be rewarded
Disagree	I think the needs of the individual has to be assessed and then the money worked out other wise the individual might not be able to finish their year in college if they run out of money.
Disagree	I would not like my child travelling by herself on a bus children with special needs In my opinion they don't like change
Disagree	If an EHCP includes home to school transport, this should be provided for the full term of full time education. In some cases until age 19, at school, and for HE and FE
Disagree	It is unfair that means testing should be used when assessing the contribution a pupil needs to make. I certainly will take this further if this proposal is formalised.
Disagree	It would take up more than half of my daughters mobility money. Which will reduce her access to social activities. This is not about if parents can afford it, how is the young person own budget is. As an average child could get a job at 16. Most of our children might not be able to. Parents often have added costs as it is with a disabled child.

Disagree	Its ridiculous that 16-19 have no funding but 19-25 has when children have a mandatory obligation to attend full time education till 18!!! Maybe this is an oversight of government but then this should of been bought up by the people who are standing up for our children not left to parents to go to court over!!
Disagree	Just because a pupil turns 16 why are they treated differently to someone under 16. They still have the same needs so why are they treated differently.
Disagree	Let's put more pressure on families No thanks.
Disagree	Many families cant work due to caring for their children so may not be able to make the contribution, so who will miss out, the child who needs the most help!
Disagree	My child should not be penalised for needing transport the EHCP should cover transport
Disagree	My child will be in the same school setting (bradfields academy) until 2020 which is a special needs school
Disagree	My child will be in the same school setting (Bradfield Academy) until 2020 which is a special needs school.
Disagree	My son will be in the same school (Bradfield Academy) setting until 2020 . Bradfield Academy is a special education needs school .
Disagree	My son will be in the same school (Bradfield Academy) setting until 2020. Bradfield Academy is a special needs school.
Disagree	Putting more pressure on families that are already on a low income would mean more parents not able to support their children in post 16 education.
Disagree	should be free for low income.
Disagree	So parents who go out to work and work hard pay more ? where is the equality . this should be equal for anyone with a child with special needs not tiered if their parents earn more. Just supports those sitting on low incomes and benefits to remain there ...Universal Credit has been introduced to get people back into work so the same attitude should be adopted . not ask the richer to pay to cover the shortfalls One fixed amount for all
Disagree	Special education students should not be penalised after turning 16 as they have a reason to need travel assistance. I am a single parent and could not afford these costs but my son is getting an education to gain work. This could be a hindrance to many families.
Disagree	That is a ridiculous amount to have to pay
Disagree	The children travel transportation to school should be free at any level
Disagree	This could be seen as discrimination, just because a child turns 16 doesn't mean their disability and needs disappear. So why penalise them?
Disagree	This discriminates against a group of already disadvantaged young people who cannot get themselves to school and who already have little choise about where they can go.
Disagree	This is an anomaly within the current education system in England. As you are no doubt aware all children in England have to either stay in full-time education, for example at a college, start an apprenticeship or traineeship or spend 20 hours or more a week working or volunteering, while in part-time education or training. However, the council is under no obligation to provide assistance post 16, but

	then has to again from 19-25. In all likelihood an SEN child will remain in full time education and therefore have to travel longer distances than an able child to access the limited amount of provision in Medway. In essence this should be looked at in great detail as you could be disadvantaging SEN children from attending school.
Disagree	This proposal suggests that currently over 16's do not have to use there own to pay towards there travel. If this is correct why should this change. These individuals have payments (DLA,etc) due to there special needs. This money is there money and should be spent on what they need not on subsidising a council wanting to make cost cutting policies. These people are entitled to a free education. These people are going to suffer discrimination throughout there lives. They need to be supported and allowed to have an education without further discrimination from a local authority council.
Disagree	Totally disgusting can we remind ourselves that these 16+ children have a lower mental development age, also taking £600 a year from families is not except able working families already pay through their taxes and then penalising them for working is totally discrimination
Disagree	We may not be a low income family, but we don't have money for this. We have a daughter at university and are already having to help her as her grant doesn't pay for her accommodation etc for the whole year.
Disagree	Where are disabled children in SEN until they are 19 years old expected to find an additional £600 per academic year?
Not Sure	£600 is quite high
Not Sure	As pupils are expected to stay in education until at least 18, with many SEN pupils continuing in further education with their EHCP's up to the age of 25 should this be family means tested rather than a set figure for pupil contribution. As an example using the annual bus charge of £670, this may not be affordable to some families which will restrict the choices of further education.
Not Sure	Even when kids leave school and go to college they will still need help getting around safe. They still have their walking needs and medical needs that make it hard to get about
Not Sure	For some over 16 pupils this will work out very well but for others with more complex needs they still may need a special school bus. Especially if there is a great distance involved. Pupils further on in their development who can travel safely by themselves , £600 is a lot unless they have a grant.
Not Sure	How has this value been determined, is it fair?
Not Sure	I do not work as I care for my child , Therefore any contribution on my part financially would massively impact me.
Not Sure	I think this depends on the individual as every child I'd different and some may not have extra finance to cover this reduction
Not Sure	If continued education is now a legal requirement, shouldn't pupils be considered the same as if they were under 16?
Not Sure	if parents on a low budget not sure they would be able to afford this even with the 25percent reduction
Not Sure	If the family does not have a history of low income/free school meals the charge is acceptable for post 16. However a young person is legally obliged to be in education or training post 16 so travel policies should not change until the age of 18. In the case of low income families there should be no contribution required. It is an unclear question. Will post 16s be able to access a minibus place if £600 is paid by them? There are safety issues if these young people start travelling in taxis alone .

Not Sure	In this current financial climate and with many families struggling , it would be concerning if some young people access to school and activities were affected by whether their parents could contribute or not.
Not Sure	Its a difficult situation as I think that the barrier for low incomes is too low
Not Sure	My son is leaving school this year, so I am not sure what monies will be taken out of his benefits to pay for day care. However I think this is a bit steep !!!
Not Sure	My son is too young to comment on this I hope at that age we won't require the travel assistance but you never know and I also have 2 other siblings that need to be at school on time in a different location.
Not Sure	Not sure
Not Sure	the 25% reduction may not be enough for the least well off families.
Not Sure	The way I read this, and without knowing where my child may be going post 16, I can't say how much the cost is, but I would anticipate a limit of £600 would mean that most families will not receive any support in the future.
Not Sure	This doesn't sound like it would cover the cost of travel for the year.
Not Sure	This will work for some but not others, although I don't feel that asking for a contribution is unreasonable or offering a bus pass is out of the question.
Not Sure	We are already as parents suffering a loss due to high mileage more frequent services, replacement tyres to keep the vehicle road worthy to take our son to and from college. But now want to take another £600.00 on top. In one hand and out the other. Increase in car insurance due to more miles.

Appendix 2

Medway Parents and Carers Forum (MPCF) Coffee morning
30th January 2018
10am until 12:30pm
Gillingham Golf Club

Attendees from Medway Council

Wendy Edward
Graham Tanner
Jo Murdoch-Goodwin
Michelle Lofting
Emily Wood
Julia Smitti
Frankie Suttle

The meeting was opened by the MPCF followed by an introduction by Wendy Edward.

Graham Tanner then explained the background to the consultation.

Please note: responses from council officers to questions are in bold and responses by council officers to discussion points are in italics

Proposal One – Definition of Education Travel Assistance

General verbatim feedback from the floor.

- “I don’t think changing the name of the service is a big issue as long as it does the same thing.”
- “How do you notify a change of address – the schools are already notified so could this be filtered through to the Council?”
- “We have no problem changing the name of the policy so long as it works.”
- “We are happy with the Policy name so long as it doesn’t cost any extra money.”

Proposal Two - Annual application and review process

Question: Why do you have to have a separate annual application process for home to school transport, can this not be combined with the annual review of EHCP plans.

Answer: **This is a good point and something which could be explored further. The main problem is that transport reviews would need to take place at one point during the year whereas EHCP reviews take place on a rolling basis. Where possible, we should be looking to minimise unnecessary bureaucracy. The purpose of the transport reviews are partly to ensure that the information we hold about children and young people in relation to transport is as up to date as possible e.g. health needs**

Question: Why are the EHCPs not shared with the transport team? Each year, we are signing to say the information can be shared with other departments within the council but then it is not.

Answer: **At the moment, transport is not always discussed at the annual EHCP review so we cannot rely on this being the only information we receive.**

General verbatim feedback from the floor.

- “Sometimes transport may not be relevant to be discussed at an EHCP review”.
- “Why is it not part of the annual review process?”
- “There is already a vast amount of paperwork that parents already have to complete as part of the application process.”
- “It should be kept as part of the annual review process.”
- “This is another hoop to go through.”
- “More work for the Council.”
- “Measuring children against criteria all time”.
- “Routine is paramount in travel, I have an autistic child and it’s all about the routine.”
- “The arrangements for transport have to be down to the individual needs.”

- “You need to consider those children with severe special needs.”
- “You also need to look at transition to adulthood (16 plus) as this does not work.”
- “You may have a child that is 15 on paper but has a mental age that is a lot younger so this does need to be taken into account.”
- “I can’t seem to help my son understand what independence is. I support my son on my own and my 15 year old daughter also helps home.”
- “I think that transport does need to be reviewed yearly as things change.”
- “I think it should be done through the annual review.”
- “My child is now independent and travels on his own and gets the bus home.”
- “We have a lot of concerns about taxis not being punctual or prompt which has an impact on the child’s learning as they are late for school.”
- “The Council should review the policy themselves and simplify the application, make it idiot proof.”
- “The Council should be liable for each child.”
- “Families should be given options according to their needs.”
- “There should be a more flexible process.”
- “The problem with having this application process that you want to put online is not everyone has access to the internet and some people need support on the computer. There needs to be somewhere, where you can go to get support to fill out the forms.”
- “Pressure on schools to fill out forms also. Schools need to focus more on education rather than admin tasks such as helping parents to fill out more forms.”
- “Annual form – no emotion or feelings are taken into account.”
- “Review forms need to be simplified.”
- “Paperwork means nothing – no experience of the journey children need to take to get into school. The journey makes children stressed and not in a correct state to learn once at school.”
- “Who do we contact as we have problems contacting the Council, is there a general telephone number?”

- “Not everyone is competent to complete the form via the online application.”
- “Some people have difficulties completing the application forms, we need to know what they (the Council) are looking for.”
- “The Council should talk to each other.”
- “There should be a review of the transport as part of the school review to cut down on all of the processes.”
- “School placements team rejected a placement due to the cost (this placement was close to my house). Now my child goes to a school further away and has transport so there is a cost associated with this as it’s four hours of transport. Departments do need to start talking to each other about costs.”

“There is a weekly panel meeting where service managers can challenge the costs and logistical implications of transport associated with education placements.”

- “Transport should be reviewed as part of the EHCP as it is cutting down the layers and the paper work that parents have to do.”
- “The forms that are completed rely on us as parents to put all the information down, whilst with the EHCP reviews there are professionals in the room so that helps.”
- “I live in Twydall and I am concerned about the amount of time that my child spends on the school bus, he is arriving at school distressed which is not right.”
- “My school SENCO spends lots of time helping parents filling in forms. These need to be simplified so the SENCO is not spending their time form filling in and supporting the children.”

“I have not been made aware that children have been arriving at school distressed after being on the school bus. This is where communication is so important. If there are issues like this, then the SEN Transport team needs to be made aware of this so we can address the issue with contractors and schools. Currently, with the EHCP I don’t think we capture all the necessary information regarding transport so we would not be able to make the correct decisions. An annual SEN Transport review process would mean that we are capture all the needs of the young person and ensure that the right arrangements are made.”

Question: Why don’t you get someone from your office to go on these buses to see what a journey to school is like for the children? We as parents and the school know what it is like for them, but you don’t as you are sitting at your desks

Answer: I have been to Abbey Court school at the end of the school day to see what that it is like for children.

This is not the same as the actual journey though.

This is something that we can look at as a team.

- “You are talking about communication, how do we get hold of you? What about people who don’t have email? How do we know that you have got the email? We need to have more contacts. I prefer to talk to someone so I know that the issues are going to be dealt with.”
- “Contacts and emails do not feel safe. Communication is lacking, we would like to have more telephone numbers.”

“We will take this on board and will update the website with contact details. We will also add this on to any written correspondence we send you.”

- “My child spends four and half hours in a taxi and I don’t not think this is acceptable.”

“The Home to School Transport co-ordination function came back in-house from September 2017, this is why we are asking for your feedback now. We are gradually picking up on and acting upon some individual issues and concerns”

- “You need to make the children safe. My child has got a taxi and has been physically attacked and mentally abused and the driver did not know what to do. After this incident my child was terrified to go to school and did not go for two weeks. I give you my child to be taken to school and he is not safe.”
- “Children are distressed when they arrive late for school.”
- “There are a mixture of disruptive children and mainstream children on mini buses.”
- “You don’t give drivers or escorts any training.”
- “We need to have more escorts.”
- “Drivers are not given any training to deal with special needs children.”
- “There is nobody on the bus to ensure that the children are safe. How many children are safe going to and from school? My child was involved in an incident on a mini bus and was not safe.”
- “What happens to my child in the mini bus or car if it has a puncture? Do they stay in the car or do they have to wait outside the car?”

- “The escort/ drivers has no idea about our kids disability or medical needs. You are putting vulnerable kids at risk. Escorts are not medically trained.”
- “Taxi companies have no information about the children, this is a safeguarding issue.”
- “Not every child is the same and this cannot be a general annual review. It needs to be individualised.”
- “Should be able to get own copy of the annual review emailed to parents.”
- “A taxi driver told me ‘these children are not normal’.”
- “Using new transport services (taxi companies) to save money, transport has suffered as a result.”
- “You are just using the cheapest companies possible, I am handing over my child and they should be safe.”

We are carrying out a skills audit with all our providers and I have met with all the providers to be clear about our expectations. If there are any incidents like the ones described, we need to be made aware as the safeguarding of children and young people is paramount. Additional training for drivers and passenger assistants is planned but this needs to be scheduled during school holidays to avoid disruption.

- “The driver does not understand the needs of the children. Will a taxi driver be able to deal with three children and a puncture?”
- “Surely the annual review is an official process so why is there second/separate forms when this would have already been discussed in annual reviews.”
- “With the online forms there needs to be the option to print the form after you have submitted it.”
- “There should be an option for parents to obtain a copy of the form online.”
- “In one year my child has had five drivers and 20 escorts, we used to get a visit ahead of the start of a school year so that we know who we are handing our children over to, but I have not had the visit. Escorts need to be trained if a child has epilepsy, our escort was moved to a different bus to support a child with epilepsy and so the escort changed.”
- “The annual review is the most important part of the process and has the definitive statement of the child’s needs, why are we revisiting it on a separate form? Why do two forms?”

- “Your department said to me that a visit was planned, but I was not in and this is why I did not get a visit (I had been out but this was as I had to take a family member to A&E).”
- “We did not get a meet and greet visit last year and the Council told us that it was not their fault if nobody was at home during the visit.”
- “You never know who the drivers are or the escorts.”
- “We never know who has our child, we never know who to call.”

“I will reiterate the importance of the provider visiting before the school term starts. We send providers a profile of each child that will be using the transport so that they can understand the child’s needs and discuss this further at the meet and greet.”

- “My transport provider told me that that they can not touch my child if they have a fit due to health and safety. He once had a fit and afterwards he was in tears. He is non verbal so cannot ask for help. This also applies to respite transport.”
- “Yes to annual review as a child may progress.”
- Should be one simple process (annual application and review process). Need to bear in mind some carers are not computer literate and some have their own special needs.

Question: Will the child’s needs and wishes be reviewed during this application process?

Answer: **Yes, they will be, this is why we are proposing to have an annual review as needs can change**

Proposal three - Personal travel assistance budgets

General verbatim feedback from the floor.

- “If I had to take my child to school it would mean that my other children would be late for school.”
- “If everyone had travel assistance budgets than this would impact on the number of cars on the roads.”
- “If there are a large number of children going to the same school then it is more cost effective to have a mini bus.”
- “I cannot just drop my child off; I would have to take them into the school. Other parents could be in the same situation so there would be lots more parents at the school. Some schools may not have drop off zones where parents can park and escort their child into the school. They may also not want lots of parents going into the school, so this needs to be a consideration also.”

“We cannot force families to take a personal travel assistance budget. This is something that we would have to discuss with families and we know that this is not an option for everyone.”

- “I would have to drive my child eight miles and you are only paying 40p a mile, but a taxi costs a lot more so there is a cost difference. Also what happens if you have to take public transport – this is expensive.?”
- “The personal travel assistance budget does not always meet the needs of the family (40p per mile).”
- “You need to take individual circumstances into account as this may not be suitable for everyone.”
- “The child’s chronological age is not always the same as their mental age so there are different needs. They may not be able to cope.”
- “A transport component should be added to direct payments.”
- “It will lead to extra vehicles on the road on high volume routes.”
- “Schools will not approve of the extra parents dropping off children, it’s busy as it is.”
- “Taking public transport if you cannot drive would takes ages due to rush hour.”
- “Hard to decide whether this would work due to no information on costing. Could be more costly in the long run.”

- “How would it be worked out? Money given to some families may be more than what they need and vice versa.”
- “Puts ownership on parents to arrange travel.”
- “The personal travel budget arrangement does not work.”
- “My son cannot be taken on public transport by himself so my wife uses public transport. It takes her 1½ hours as it is during the rush hour.”
- “What is the cost now and the cost going forward – out of all of the proposals none have a cost associated to them. We are expected to make a decision but we have no idea how much it will cost us.”
- “What is the average cost for one child to go to and from school for one day? If there are families with individual needs and specialities, the individual needs should be taken into consideration and the Council should liaise with schools.”
- “It causes extra traffic at the school gates if children attend a mainstream school and there are multiple parents dropping their children off at school at once.”
- “You would need to get detailed information from schools about the needs of our children before you make any decisions about this.”

The team is in the process of obtaining additional information from the schools regarding the needs of the children we support.

Question: Would this be in addition to the direct payments that we already receive.

Answer: This would be a conversation that we would need to have with social workers and the Self Directed Support Team. Where a family already receives a Direct Payment, it would make sense to add a Personal Travel Assistance Budget to that overall package.

Proposal four– Introduction of travel training

General verbatim feedback from the floor.

- “This would not work due to the location of my child’s school.”
- “This is a good idea.”
- “My child is 11 so this would not work for him.”
- “Some children don’t have a high mental age to be able to do this. For example my child is 15, but has a mental age of a seven year old.”
- “You need more training for escorts.”
- “We need training for escorts first on the buses rather than thinking about training the children. You need to look at improving what you are offering already before moving on.”
- “I have a child who is capable to get own bus but would she actually do it?”
- “Never had a discussion before about travel training.”
- “In the short term, this would cost more as you would have to pay for someone to train young person. In the long term, it may be okay.”
- “It would be a good idea as children would learn skills they will need later on life e.g. how to take the bus independently.”
- “Wheelchair accessibility might be a struggle leading to a stressed journey and not wanting to learn.”
- “What about children who are not in SEN schools but just regular secondary schools? Would they still get the same opportunities to do this?”
- “Got to have someone willing and patient enough to do the training which would consist of doing the same thing day after day.”
- “Specialist schools would be better at offering this as they know the children well.”
- “It is not acceptable for children to get public transport to school. It could take longer and then leave them stressed which can then impact on their learning. Plus there are issues around timetables and accessibility.”

“No one will be forced to participate in travel training if they are not ready. This is just one of the options that we are looking at. We would work with families and the young person before this gets introduced. There will also be flexibility in this. For example, travel training could be initiated and subsequently reviewed if it is not working for the young person. The young person’s travel assistance needs would continue to be met based on an assessment of their needs.”

- “First you need to look at training for escorts before you move forward.”
- “Special schools provide travel training, but what about mainstream schools? There a large number of children with ASD in mainstream schools. I am not convinced that mainstream schools will be able to deliver travel training to those with additional needs.”
- “I think this (travel training) should be delivered by schools as they know the children.”

Proposal 5 - Pick up points

General verbatim feedback from the floor.

- “I have three other children so how would I be able to get one child to a pick up point and the others to school.”
- “If you have more than one child then this will not be possible.”
- “If you have more than one child and they go to different schools then a pick up point would not work.”
- “I don’t understand this idea, it is very bizarre arrangement. It would be difficult to get children there.”

“One of the reasons behind this idea is that children are spending excessive time on transport and pick-up points could reduce this time.”

- “I have two children in wheelchairs, how would I be able to get to a pick up point as I can’t push two wheelchairs, I also don’t drive.”

“Each individual case would be looked at to see if is suitable, this option may not be suitable for everyone.”

- “This could be good as it could start to help with independence.”
- “Pick up points are positive, they show that the child is becoming independent.”
- “The door to door service is not happening. Sometimes the mini bus stops in the middle of the road (even though there are parking spaces) my child then has to open the door and get in. This is dangerous and we live on a busy road. The transport company this year is rubbish.”
- “You need to have two escorts on the bus, one to look after the children and another to walk the child their front door.”
- “It is difficult for special needs children to use other methods of transport. Will this just be saving 10 minutes?”
- “Pick up points are not a good idea especially if there are traffic problems or the transport breaks down.”
- “There are also other children in the families which need to be considered.”

- “If the taxi is late, it means there will be a lot of distressed children all in one place and children waiting for ages.”
- “It will create hassles. There is a reason certain children get picked up from door to door.”
- “I have other children to get to school too – this could lead to lateness.”
- “How will the children get to these pick up points?”
- “Will Medway Council be paying for mileage for parents to do this?”
- “Would mean extra cars on the road. For example, if six children are sharing a taxi and share a pick up point, there could be potentially six more cars on the road taking these children to the pick up point.”
- “Do you need land owners permission to do this?”
- “My children go to different schools in different areas of Medway.”
- “I have two special needs children, senior and infant, with two wheelchairs and it is not possible for them to get to two different pick up points because of complications with equipment and car seats. Do you expect the child to walk to the pick up point or get there by another means of transport?”
- “Will you pay parents mileage to get children to the pick up points?”
- “My child would need to have two escorts and one to walk the child to their door.”
- “Who would deem the child appropriate to have a pick up point?”
- “Have the environmental impacts been considered?”
- “Pick up points may be tricky due to other children.”
- “Are the routes, pick up points going to be safe, children may not be able to cope due to behavioural issues etc. Safety elements?”
- “This is not suitable for most autistic kids – they have been told that they are going to or from school. A pick up point could confuse them.”
- “If lots of children and parents go to the pick up point with multiple difficult children, any one of those children could run off or be disruptive.”

- “It is difficult for the child to become independent.”
- “Where there are various special needs children in one family, how can I get all the children to one pick up point?”
- “Who is responsible for getting the child home?”
- “I do not agree that there should be one pick up point for all.”
- “The Council should look at the location and situation of the family dynamic.”
- “Pick up points would encourage independence. If things are put in place now, the younger adult could become more independent.”

Questions: Where would these pick up points be?

Answer: **At the moment we don’t know exactly. We would have to look at the routes we have and consider whether a pick up point is feasible. Also we have to consider if this is right for the child/young person and the circumstances of the family.**

Question: What happens if the driver is late to a pick up point? Some parents won’t be able to wait for the driver especially if they have other children – this would mean that their other children would be late.

Answer: **We know that this is not an option for everyone and if we go ahead with this proposal, then we would look at routes and individual cases. Nothing we are discussing here today has been plucked out of thin air. We have researched what other councils have done and what has worked elsewhere and we are talking to other councils too.**

Question: Would you be paying parents mileage to take their child to a pick up points?

Answer: **This is something we would have to look into**

Question: Who is going to deem if a child is suitable for a pick up point?

Answer **This will be part of the review process and we would also work with families.**

Proposal 6 - Respite

General verbatim feedback from the floor.

- “It is extremely challenging for parents to arrange their own respite transport.”
- “Regarding the issue of transport I know how many nights of respite I get and sometimes when this is, why can’t the respite provider then tell the transport company when this is or allow the parents to contact the transport company directly.”
- “Sometimes you only get two-three days notice for respite so I will not be able to give you the five days notice that you are asking for.”
- “Can the Council provide respite?”
- “Why can’t we ring the taxi company directly to arrange our own respite transport?”
- “We do not always get 5 days notice for respite. We can’t plan if there is an emergency or a family situation.
- “Lack of communication for respite.”
- “Why can’t we arrange own respite travel? Ringing the taxi firm personally, cuts out the middle man.”

Proposal 7 – Financial contribution for students aged >16 <18 (academic year 12 to 14)

Question: Would there be an instalment plan in place, as £600 is a lot to find in one go

Answer: **Yes we will look at an instalment plan, at the moment I could not say exactly how this would work.**

Question: Why is it that you are saying transport has to be funded by parents from post 16 rather than 18, when compulsory school age is up to 18?

Answer: **The council's statutory responsibility is to fund travel assistance for children and young people of compulsory school age (>5 <16). Whilst the age of participation has been extended to age 19, the legislation has not changed. Medway is an outlier in terms of not charging a contribution.**

Question: But if it legally states that the school age is 18, then transport should be till 18 and not 16, so why are you only funding to 16, surely you should be funding to 18?

Answer: **As above.**

The arrangements reflect national legislation and this is something that would need to be taken up through your MP.

General verbatim feedback from the floor.

- “The low-income bursary arrangements are not fair, say if a young person went to Mid-Kent college they can get a bursary, but if they went to a special school like Abbey Court, they would not get a bursary. This is unfair and discriminatory.”
- “I am worried what happens when my child leaves school this year as he is 22 and I am on a low income.”
- “This could be discriminating for special needs children.”

Other comments

Question: I have been listening to all of the experiences that parents have had and it is disgusting. I don't feel that they are listened to. Where is all the money that the council gets going?

Answer: A budget for SEN Home to School Transport is set each year but each year demand for transport is increasing. Councillors also scrutinise how much we are spending and on what

Question: Your proposals don't have anything about the costs, how do you know if you are going to save money when you don't know how much it costs

The costs will change year on year depending on the demand and the needs of the children accessing the services. The extent of any cost savings will depend on how comprehensively any or all of these proposals are implemented

Question: What is your average cost per child to transport them to school?

Answer: This is impossible to answer as it depends on the needs of the child and if it is a bespoke package.

- My son currently gets a bursary to go to college and he is 20. I am really worried about what will happen when he leaves college as he was rejected for an EHCP.
- You are currently have one of the cheapest unit costs when it comes to delivering home to school transport, making these changes could increase your costs.

Next steps

Graham Tanner explained that a report will be produced based on all the findings and information gleaned from the consultation and this will then be presented to Children and Young People's Overview and Scrutiny and Cabinet for a final decision to be made on the proposals.



Medway Council

Education Travel Assistance Policy

- **Mainstream pupils**
- **Pupils with SEND**
(Special Educational Needs
and Disabilities)

This policy is for Medway resident pupils only

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Programme Lead, Targeted Services
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Any questions or matters arising should be directed to the relevant department.

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Introduction

All local authorities have a statutory duty to have in place arrangements for the provision of education travel assistance for children and young people (mainstream and SEND) who meet the published eligibility criteria.

The Education Travel Assistance Policy is developed within a national legal framework that sets out what local authorities must do to facilitate travel to school and sets out eligibility criteria for granting that support.

Under Section 7 of the Education Act 1996, it is the responsibility of the parent of every child of compulsory school age, to cause their child to receive efficient full-time education either by regular attendance at school or otherwise. The duties and powers of local authorities to provide education travel assistance are covered in other sections of the Act and its amendments. The provision of travel assistance incorporates consideration for children from low-income families.

Sections 508B and 508C of the Education Act 1996 (as amended) sets out the local authority's duties and powers respectively, to make such suitable travel arrangements as the local authority considers necessary, to facilitate a child's attendance at school. This applies to home to school travel arrangements and vice versa. They do not relate to travel between educational institutions during the school day.

This policy has been written having regard to the Department of Education's statutory 'Home to School travel and transport guidance' published in July 2014 (<https://www.gov.uk/government/publications/home-to-school-travel-and-transport-guidance>) and the Equality Act 2010.

Section A

Education travel assistance for
mainstream pupils of compulsory
school age (5-16)

Section A - part one

Eligibility criteria, definitions and general information

1.1 Standard eligibility criteria for mainstream pupils

The standard (basic) eligibility criteria for entitlement to receive education travel assistance are that:

- i) The child must live more than the minimum eligible statutory walking distance for the child's age from the school being attended, as detailed below:

For children of compulsory school age and under eight years old – the school attended must be more than two miles from the home address.

For children aged eight and over – the school attended must be more than three miles from the home address.

and

- ii) The school attended must be deemed the nearest qualifying school to the home address.

1.2 Low-income eligibility criteria for mainstream pupils

A low-income family is defined as one where a child is entitled to free school meals and/or if the parent is in receipt of the maximum level of Working Tax Credit.

Please Note: This definition is prescribed by Central Government and may be subject to change.

If the applicant meets the above definition of a low-income family then a child/young person will qualify for education travel assistance if they:

live more than two miles, but not more than six miles, from one of their three nearest qualifying schools.

This distance is extended if the child is attending a faith school on the grounds of their faith (see paragraph 1.3).

In order for the relevant assessment to be made for low-income education travel assistance, applicants must provide an up to date full copy of their proof of benefit with the application or, if applying on the grounds that the child is in receipt of free school meals, applicants must complete the relevant details on the application so that the claim can be verified.

Where transport assistance is granted under this criterion, it will be assessed on an annual basis to determine whether the pupil is still eligible.

1.3 Denominational (faith) travel assistance

NB: For Medway Looked after Children and low-income families only

An application can be considered to certain faith schools where the pupil is attending the faith school, it was chosen because of its faith status and the pupil is of the same faith/denomination as that of the school (e.g. for a Catholic school the child is of the Catholic faith).

In these cases the Council will consider the school as the nearest qualifying to the home address where:

- i) It is over the minimum eligible distance (for low-income families, it must be one of the three nearest qualifying schools of the relevant faith between two and fifteen miles from the home address, as stated in the Department for Education statutory guidance)

and

- ii) The pupil is of the same faith/denomination as the school concerned.

Proof of faith/denomination is required and the application must be countersigned by the appropriate church authority, verifying that the pupil is a regular practising member of a church of the same faith/denomination as the school concerned.

If such proof is not provided, the application cannot be considered on faith/denomination grounds.

1.4 Nearest qualifying school

The definition of the nearest qualifying school is:

- a) The geographically nearest school to the pupil's home address that is suitable to the pupil's age, ability and aptitude
- b) Only one school can be deemed as the nearest qualifying school and this may include non-Medway schools
- c) For secondary age pupils, Medway Council also take into account whether a child is of grammar ability (under the Medway Test assessment procedures) or non-grammar ability. For grammar assessed pupils a Medway grammar school will be considered as the nearest qualifying school.
- d) A preference for single sex, mixed or particular type of school or a preference for a school because of its specialism or because it teaches certain subjects cannot be taken into account.

Qualifying schools for mainstream pupils include:

- i) Community, Voluntary Controlled, Voluntary Aided and Foundation schools
- ii) Academies and Free Schools
- iii) Pupil referral units (PRUs) – transport assistance is not provided for part-time PRU placements.

1.5 Expression of school preferences

When the school being attended is not the nearest qualifying school, education travel assistance can only be considered if:

- a) The nearest qualifying school has been applied for as a highest named preference but not offered
- b) The nearest qualifying school has been applied for as a higher preference than the school being attended
- c) Schools have been applied for in qualifying distance order (i.e. the nearest qualifying school has been applied for as the first/highest preference, the next nearest qualifying school as the second preference, and so on. This principle and minimum eligible distances apply for all preferences.¹

If the nearest qualifying school has not been applied for or has been applied for as a lower preference than the school attended, the pupil will not be eligible for home to school transport even if over the minimum eligible distance.

1.6 Accompaniment

The general expectation is that a child will be accompanied on their journey to and from school as necessary. It is the parent/carers responsibility to ensure appropriate accompaniment, if required.

Medway Council wishes to ensure equality of opportunity for children whose parents/carers have a disability which prevents them from accompanying their child along a walking route and will consider relevant up to date medical information, when assessing an application, as long as it is provided at the time of application and is from a GP, Consultant or other medical practitioner.

1.7 Application process timescales

All applications will be considered against each of the relevant eligibility

¹ For young people transferring from Year 6 to Year 7, parents can request for an indication of their nearest qualifying schools prior to submitting secondary school applications. A form to do so is available at www.medway.gov.uk

criteria, as detailed above, and any additional parameters relevant to the individual pupil.

The estimated timescale for the processing of applications is up to four weeks (20 working days) from the date of receipt of the application by Medway Council School Services Team.

This timescale includes the application assessment, notification of decision, receipt of the relevant travel pass (where applicable) and the setting up of the appropriate travel arrangements.

1.8 Definition of the home address

The address that must be used for the assessment of eligibility for education travel assistance is the **pupil's main place of residence**.

If the pupil is from a separated family and may live part time with each parent at two addresses, only the main place of residence can be considered for education travel assistance purposes (e.g. where the pupil is registered as living for GP's, child benefit, etc).

Medway Council can only provide travel assistance from one address and will only grant assistance for one return journey from the pupil's home address (as defined above) to school each day.

It is the responsibility of parent/carers to inform Medway Council should the home address change. Any change in circumstances would require a new application for education travel assistance so that the pupil can be fully re-assessed for eligibility.

1.9 Shortest available walking route

All distances calculated for home to school transport purposes are measured using the shortest available walking route from the home address to the school address.

Distances are calculated using the Medway geographical information software and may take account of footpaths, public rights of way, etc.

The shortest available walking route is one along which a child can walk to school, **accompanied as necessary**, with reasonable safety.

The safety of a route is considered and the relevant route assessment focusses primarily on identifying the road safety risks observed along the route.

Such assessments are handled in accordance with the national 'Assessment of Walked Routes to School' guidelines produced by Road Safety Great Britain (RSGB) in 2012. This states, "Case law has found that assessments must look at the relationship between pedestrians and traffic only. Personal safety issues of children travelling alone are not considered. Local authorities are not legally obliged to provide free transport just because parents perceive the route to be unsafe on the grounds of personal safety and security."

The same method of measurement and route calculation is used for all applications to ensure that the nearest qualifying school can be identified. All distances will be calculated to four decimal places in miles and metres

Ordnance Survey advise that the point on a map that co-ordinates represent will be subject to a measure of accuracy. The absolute accuracy, which is the accuracy to a point originally surveyed at 1:1250 will be +/- 0.9 metres at a 99% confidence level. As home to school distance calculations deal with a home address and a school address, it is considered that any measurements made to route a child from home to school are given an overall accuracy of +/- 1.8 metres. This is the tolerance allowed for in all distance and route calculations.

If the route calculated is determined to be unavailable, then the distance and route is used for measurement purposes only and there is no expectation for the pupil to walk the route determined.

1.10 Limitations and matters that are not considered in education travel assistance assessment

- a) Medway Council do not provide education travel assistance for any mainstream child below compulsory school age in a school, nursery or pre-school setting
- b) Parent/carer work or other commitments
- c) Attendance of sibling at the relevant school or other schools
- d) If the parent/carer chooses for their child to attend a school that is not deemed the nearest qualifying
- e) Work experience placements
- f) Any travel between educational establishments, visits to other schools, colleges or other establishments
- g) Attendance of any out of hours clubs (e.g. breakfast and after school clubs or any extra curricular activity outside of the normal school day)
- h) Attendance at any educational provision at weekends or bank holidays or any link courses, elective lessons, etc. that take place outside of the normal school day
- i) The use of any address other than the home address. This includes any address used for childcare/childminder arrangements

1.11 Expectations of behaviour

All children who are granted education travel assistance are expected to adhere to the behaviour terms and conditions of both Medway Council and

the relevant transport operator. Any ticket issued is subject to the conditions of travel set by the relevant transport operator. By signing the application form and accepting the ticket both the parent/carer and the child are agreeing to abide by such conditions of travel.

If the child misbehaves their ticket may be withdrawn either temporarily or permanently, depending on the circumstances of the individual case. In these situations the parent/carer is then responsible for their child's travel arrangements. The transport provider will advise Medway Council if a child is banned from travel and the Council will no longer accept responsibility for the child's travel nor provide alternative arrangements.

Only the child named on the ticket is entitled to use the allocated ticket. If it is found that the ticket has been misused by another child then the relevant transport provider may pursue a prosecution against the eligible child and the child found using the ticket.

A Headteacher may also make a decision on whether a child's behaviour whilst travelling determines that travel assistance should be withdrawn. Such decisions should only be made based on sufficient evidence and following discussions with Medway Council.

Section A - part two Assessment and outcomes

2.1 Initial assessment and outcome

All applications will be considered against **all** the relevant eligibility criteria, as detailed in part one above, and the provisions of this policy.

- i) Where the initial assessment determines the pupil **is eligible** to receive education travel assistance, the applicant will be formally notified and the relevant travel pass issued, along with details of the transport provider/operator.
- ii) Where the initial assessment determines the pupil **is not eligible** to receive education travel assistance, the applicant will be formally notified of the decision and the reasons why the application has not been successful. This decision will also provide details of the appeal process (as shown in Section C of this policy)

2.2 Education travel assistance for children who move house during a critical stage

Where a family move home during a critical stage of their child's education (during Year 6, 10 or 11) education travel assistance **may** be granted to the current school being attended to allow completion of their course and continuity of their education.

The minimum statutory eligible walking distance (as detailed in Section A - part one) and consideration of ease of access from the new home address to the school being attended will be taken into account when assessing suitability of providing travel assistance.

2.3 Mode of transport

The route an eligible child will travel and the mode of transport to be used is determined by the Council when education travel assistance is granted to ensure best value for money. This means that pupils will normally travel by public transport.

If the applicant feels that there are exceptional circumstances for the child where public transport is not appropriate, they may request for the provision of a taxi to be considered.

The use of a taxi will only be considered in exceptional circumstances (usually relating to medical grounds) on a case-by-case basis, as long as relevant supporting documentation from an appropriate professional (e.g. medical practitioner) is provided.

Applicants may also request for a cash allowance to be provided instead of a mode of transport to assist them in transporting their child to school themselves.

The cash allowance is calculated at a cost per mile (or part thereof) for one return journey each school day. There is a maximum allocation of cash allowance that can be granted each academic year and all allowances are issued three times per academic year (September, January and April).

For the latest information on the cost of cash allowance per mile that can be granted, please contact School Services.

2.4 Independent and/or non-Medway schools

Medway Council **do not** provide education travel assistance for any Medway resident child attending an independent, private or fee-paying school.

In certain circumstances education travel assistance may be considered for a Medway resident attending a non-Medway school if said school is deemed the nearest qualifying school, or the pupil has moved house during a critical stage, or if qualifying on low-income and/or denominational grounds (as detailed in part one of this policy).

2.5 Consideration of medical needs

In exceptional circumstances special consideration can be given for education travel assistance on the basis of medical grounds. If an application is being made on this basis, relevant medical evidence must be supplied at the time of application.

Such evidence must be dated no earlier than 6 months prior to the application or be the latest evidence available for long-term conditions (e.g. epilepsy, cerebral palsy, ongoing mobility conditions).

The evidence provided must be from a GP, Consultant or other medical practitioner and must detail the child's medical needs, why the school being attended is the best suited to meet those needs and that the child is unable to access the school without travel assistance because of said medical needs and/or condition.

2.6 Home to school transport for Post-16 mainstream pupils

There is no free entitlement to home to school transport for Post-16 mainstream pupils.

Medway Council issued an annual policy statement providing information on the options available for Post-16 pupils. This can be found on the Medway Council website (www.medway.gov.uk/gettingtoschool).

Section B

Education travel assistance for SEND pupils

Section B part one

Eligibility criteria, definitions and general information

3.1 Applications

Parent/carers may apply for education travel assistance when their child has a final or amended Education, Health and Care Plan (EHCP) or a Statement of Special Educational Needs.

Medway Council will consider an application for travel assistance when the pupil is in receipt of a proposed EHCP and when a decision has been made by the Council, in consultation with parents/carers about a school or other educational placement.

3.2 Eligibility criteria

- (a) Having an EHCP **does not** mean that a pupil is automatically eligible for education travel assistance. Eligibility is assessed based on (i) the individual needs of the pupil (taking into account their age and mobility) and (ii) where transport is not required in relation to SEN needs, the distance from home to the school being attended will also be taken into consideration
- (b) For pupils attending work experience placements, transport assistance will only be considered if they rely on a wheelchair for mobility or are registered as blind
- (c) If the Council places a pupil with an EHCP in a specialist provision that is not the pupil's local school, for the purposes of this policy, such provision will be deemed to be the nearest qualifying school. The distance criteria (as shown in Section A of this policy) will still apply when assessing the pupil for travel assistance

3.3 Consideration of medical needs for SEND pupils

In exceptional circumstances, SEND pupils may be given special consideration for education travel assistance on the basis of medical grounds. If an application is being made on this basis, relevant medical evidence must be supplied at the time of application.

The evidence provided must be from a GP, Consultant or other medical practitioner and must detail the child's medical needs, why the school being attended is the best suited to meet those needs and that the child is unable to access the school without travel assistance because of said medical needs and/or condition.

In addition, travel assistance may be provided where the parent/carer is unable to accompany their child due to their own medical conditions. Relevant medical evidence from a GP, Consultant or other medical practitioner is required.

Section B - part two Assessment and outcomes

4.1 Travel assistance arrangements

Where a child or young person is eligible, the Council will consider how travel assistance may be provided in the most appropriate and least restrictive way possible. All applications will be considered by a weekly SEN Travel Assistance Panel to determine the most appropriate arrangement based on the needs of the child or young person as presented in the application.

In the case of high volume routes, shared transport arrangements are likely to be the most cost effective and environmentally sustainable solution under most circumstances. However, in the case of solo or ad-hoc travel arrangements, a cash allowance or direct payment in the form of a Personal Travel Assistance Budget may provide greater flexibility for families and carers to make their own arrangements.

All applications for travel will be considered for a cash allowance or, in cases of complex or exceptional needs, a direct payment in the form of a Personal Travel Assistance Budget. Other direct support will be available where appropriate, for example a travel pass for public transport, a walking escort or shared transport.

When making decisions about the type of travel assistance to be granted for eligible pupils, including whether or not a passenger assistant is required, the Council will consider:

- (a) the specific special educational needs of the pupil
- (b) whether the family/carer might wish to be financially supported to make their own travel arrangements
- (c) where applicable, the type of vehicle in which the pupil will be travelling in
- (d) the length of the journey (see 5.1 below)
- (e) whether the pupil is physically able to walk the home to school distance
- (f) whether the pupil is required to be accompanied by a walking escort or passenger assistant

4.2 Review of transport provision

Unless otherwise agreed, applications for SEND Travel Assistance must be submitted on an annual basis, and all existing arrangements are subject to an annual review process overseen by the Council's SEN Travel Assistance Panel.

4.3 Personal allowances

The Children and Families Act (2014) introduced the option for parents to ask for a personal budget for some elements of a child's Education Health and Care Plan (EHCP).

Although entitlement to travel assistance rarely forms part of an EHCP, Medway Council uses its discretionary powers to treat home to school/college travel as if it were part of an EHC Plan. This means that parents or carers can ask for the cost of travel assistance to be paid as a **cash allowance** or, in cases of complex or exceptional needs, a direct payment in the form of a **Personal Travel Assistance Budget (PTAB)** to make their own arrangements to ensure their child gets to school. This might include taking the child themselves or paying someone else to provide the service.

4.3.1 Cash allowances

A cash allowance is normally payable at the Council's published mileage rate for the journey to and from school where the child is transported i.e. two journeys.

Claims for an agreed cash allowance must be presented monthly and received by the Council's SEN Travel Assistance Team no later than the 14th of each month to enable payment of the cash allowance for the preceding month. No other time schedule is possible. It is the responsibility of parents/carers to submit the claim on time. Claims received for cash allowances outside of the specified time frame will not be paid.

Claims should be for the actual mileage incurred. Where claims are discovered to be for amounts greater than is justified, the Authority will seek reimbursement and will refer cases of fraud to the Police.

4.3.2 Personal Travel Assistance Budgets

Personal Travel Assistance Budgets (PTABs) will normally represent the value of the cash allowance, plus an additional payment to support parents/carers to arrange personalised, flexible travel arrangements that suit the needs of their child and family. Parents/carers will not need to show the council how their PTAB is spent. Parents/carers can spend the budget however they like as long as their child is supported to attend school regularly and on time. The Council reserves the right to terminate a PTAB arrangement at its sole discretion should concerns arise in relation to school attendance.

The published PTAB values represent the maximum proposed allocation for each distance banding and each application will be considered on an individual basis, taking into account the level of additional needs and requirements.

The value of the PTAB based on distance bandings will be reviewed annually and published on the Council's website. A PTAB cannot cost the local authority more than it would otherwise cost to provide the service and, in the case of high volume routes, shared transport arrangements are likely to

continue to be the most cost effective and sustainable solution under most circumstances. A PTAB will, therefore, not normally be offered when there is a place available on existing transport and at a cost less than the cost of payment to parents/carers.

4.4 Allocation of transport

Where the SEN Travel Assistance Panel determines that travel assistance should be granted through one of the Council's commissioned transport providers this will usually be in a shared vehicle with other pupils. Wherever possible, parents/carers are expected to take their child to/from a pick up/drop off point. Such points will normally be within half a mile of the home address and the Council and its contractors will always give due consideration to the age and needs of the child and the route to and from the pick up/drop off point.

Solo pupil transport (e.g. private taxi) will only be considered in exceptional circumstances and only where there is clear evidence to support the need. Any solo pupil transport granted will be for a limited period of time and there is an expectation for the pupil to return to shared transport at the end of the specified period. All such arrangements will be subject to an annual review process to ensure, in consultation with families and carers, that arrangements take account of the personal development of individual children and young people, opportunities to promote independence and any changing individual or family circumstances e.g. medical needs.

The expectation is that as the pupil grows older and matures they are supported to use public transport wherever possible.

4.5 Provision of passenger assistants

Passenger assistants will only be provided in exceptional circumstances. These include but are not limited to:

- a) Where a number of children are travelling together and require supervision
- b) Where a child has a severe medical condition or behavioural need, that requires support during transportation

Any request for a passenger assistant must be supported by detailed evidence that demonstrates the risk to the child and/or others. The evidence provided must include a risk assessment, compiled by the Council in partnership with the school or education setting and/or medical professionals, and, in the case of behavioural needs, detail any other strategies that might reasonably be employed to support the young person.

Where a passenger assistant is provided, this requirement will be reviewed every 6 months. The need for a passenger assistants may change as the child grows older.

A passenger assistant's duty is to supervise pupils on the vehicle. They will assist pupils to board and to leave the vehicle but they cannot collect

pupils from their home and take them into a school if that would mean leaving other pupils unattended in the vehicle.

Passenger assistants' duties also include the delivery of notes, medication or money between home and school.

It is the parent/carers responsibility to supervise the pupil from the house to the vehicle and the duty of the school staff to get the child from the vehicle into the school building. At the end of the day, school staff supervise the pupil's entry to the vehicle and parents/carers must supervise the pupil from the vehicle into the home.

Guidelines are issued for operators, drivers and passenger assistants. All drivers and passenger assistants will be required to undergo appropriate training, commensurate to the needs of the children and young people they are supporting and will carry an identity card which will be renewed every three years following a new Disclosure and Barring Service (DBS) check.

Where a pupil has a serious or life-threatening medical condition or exhibits extreme challenging behaviour, we encourage parent/carers to act as the passenger assistant. If this is not possible the Council will make all reasonable endeavours to provide an appropriately qualified passenger assistant but this cannot be guaranteed.

4.6 Residential educational provision

For pupils placed in a 52 week residential school, Medway Council will provide one return journey at the start and end of the placement. Travel assistance will not be provided for any other visits to the school, or if the parent/carer chooses to take their child home for any reason.

For pupils placed in a residential school on a weekly, fortnightly or termly basis travel support will be provided according to the residential agreement. In these circumstances, Medway Council will provide one return journey at the start and end of the week, fortnight or term, as applicable. Travel assistance will not be provided for any other visits to the school, or if the parents choose to take their child home for any reason.

Section B – part three

Operational issues

5.1 Length of journey

In normal circumstances the maximum journey time will be no more than 45 minutes for a pupil of primary school age and 75 minutes for a pupil of secondary school age, in accordance with statutory guidance.

In some individual circumstances (dependent on where the pupil lives and/or the location of the school being attended) it may not be possible to ensure this.

5.2 Transport changes due to extreme weather

On rare occasions, severe weather may impact on Medway Council's ability to arrange transport safely. Where severe weather results in the requirement to cancel transport every effort will be made to notify parents at the earliest opportunity.

If transport is cancelled the Council will, wherever possible, try to give parents an indication of when it is likely to resume. If transport is cancelled due to extreme weather, the following is applicable:

a) Where a route is cancelled and a parent/carer takes the decision to transport their child themselves, the parent/carer remains responsible for the return journey or any consequent costs should a return journey not be possible

b) The parent/carer remains responsible for their child

Where a pupil is placed in residential provision and is unable to be transported home, the school and the parent/carer are responsible for ensuring that suitable arrangements are made for the child. This may include an extended stay in school, or overnight accommodation with an appropriate adult. If a child attends a residential school and is unable to get to school due to severe weather, (a) and (b) apply.

5.3 Time keeping

In order to enable drivers to keep to schedule and to pick up and return pupils home at the times agreed, parents are expected to have their child ready at appointed or scheduled times and be there to collect them when they are expected home.

A driver will wait for no more than three minutes beyond the scheduled pick-up time at a pick-up point in the morning.

If there is no-one to collect a child at the end of a school day, the driver will take the child on for the remainder of the journey and return to the agreed destination once all the other students have been delivered to their

destinations. The child will not be left unescorted and will not be left with anyone other than the parent/carers without their written authorisation.

If the parent /carer is still not there to meet the child, and where there is no suitable alternative, Medway Council's Children's Safeguarding Team will be contacted and the child may be taken into care.

5.4 Transportation of equipment

Pupils are expected to travel with no more than one item of hand luggage.

Pupils attending residential schools are expected to travel with no more than one suitcase (or equivalent). Parents of a child who has extra items (e.g. to meet their medical or physical needs) are required to make prior arrangements to include these.

5.5 Pupil safety whilst travelling

The safety of children who are eligible for support with transport is Medway Council's first priority. In particular, Medway Council will ensure that:

- a) All drivers and escorts have been checked and cleared by the Disclosure and Barring Service (DBS) and carry identity cards
- b) Seat belts are provided and used on all contract vehicles
- c) Car seats/booster seats are provided in accordance with current Government legislation
- d) Passenger assistants receive appropriate training and are familiar with safety and emergency equipment

Section B – part four
Travel Assistance arrangements for learners aged between 16 and 25 with SEND

6.1 Eligibility

Medway Council has a duty under DFE “Post 16 Transport to Education and Training” Statutory Guidance for local authorities (February 2014) to consider travel arrangements for learners with learning difficulties and/or disabilities.

The Guidance states that the transport needs of young people with learning difficulties and/or disabilities should be reassessed when a young person moves from compulsory schooling to post 16 education.

The Guidance also strongly recommends travel training schemes to enable young people with learning difficulties and/or disabilities to gain skills which can be used for travelling to education or training, particularly because of the all round benefits.

An application for travel assistance for post 16 travel assistance must be completed and the Council will consider travel arrangements for young people with learning difficulties and/or disabilities who are resident within Medway, subject to a Statement of Special Educational Needs or an Education, Health and Care Plan, aged over 16 but under 25, and who live more than 3 miles (by shortest available walking distance) from the education institution or training provider.

A Statement or Special Educational Need or an Education, Health and Care Plan does not provide automatic entitlement to free travel arrangements.

6.2 Student contribution

Whilst young people are now required by law to be engaged in education, employment or training up to the age of 19, the compulsory school age remains 16. Local Authorities do not have a statutory duty to provide home to school/college transport free of charge for learners aged 16 to 19 in the same way as they do for primary and secondary aged pupils up to the end of Year 11. Subsidised post-16 transport is, therefore, a discretionary provision.

All students aged 16-19 (Year 12-14) who require assistance travelling to school or college will be required to pay a contribution towards the total cost of travel. This contribution will be reviewed annually and published within Medway’s Post-16 Travel Assistance statement. This applies regardless of whether they are living in the parental home.

Learners/parents/carers will be notified of the cost of contribution in advance of their student attending Post 16 provision. This will be done once a request for travel support has been approved.

Requests for payment will be made termly at the beginning of each term. Contributions must be paid immediately so that transport arrangements can be made.

A 25% reduction to the published contribution rate will apply in line with the eligibility criteria described in paragraph 1.2

Where a young adult with a learning difficulty and/or disability aged 19 – 25 has a named education / training provider in their EHC Plan, and if taking into account their personal circumstances, transport is necessary to enable them to access this provision, then transport to/from the place of learning/training will be arranged on an individual basis without charge.

6.3 Travel Assistance arrangements

Pupils accessing post 16 education will be offered a Personal Travel Assistance Budget (PTAB) or travel pass, or where the council considers it to be the most cost effective solution, a place may be offered on shared transport.

Solo pupil transport will only be considered in exceptional circumstances and only where there is clear evidence to support the need. Any solo pupil transport granted will be for a limited period of time and there is an expectation for the pupil to return to shared transport at the end of the specified period. All such arrangements will be subject to an annual review process to ensure, in consultation with the young person and their family / carer, that arrangements take account of the personal development of individual young people, opportunities to promote independence and any changing individual or family circumstances e.g. medical needs.

The expectation is that as the young person grows older and matures they are supported to use public transport wherever possible.

All arrangements will be appropriate to the needs of the young person and follow the DFE guidance to promote independent travel skills.

Travel provision on a hired vehicle or with a walking escort must be between one defined "home address" and the educational institution or training provider.

Travel provision on a hired vehicle or with a walking escort will be made for the days during the academic year on which the young person attends the educational institution or training provider.

Travel provision on a hired vehicle or with a walking escort may be subject to change to an alternative provider at the discretion of Medway

Council. There will be no right to appeal regarding the change in this case.

6.4 Young people over the age of 16, but under the age of 25 in residential educational provision

Where a young person is placed in a 52 week residential provision school transport arrangements are not provided. In these circumstances, Medway Council will provide one return journey at the start and end of the entire placement. Transport arrangements will not be made for any other visits to the school, or if the parent/carer chooses to take the young person home for any reason.

Where a young person is placed in a residential school, other than on a 52 week residential basis, transport arrangements will be provided according to the residential agreement (dependent on weekly, fortnightly or termly fee arrangements). In these circumstances, Medway Council will provide one return journey at the start and end of the week, fortnight or term, as applicable. Transport support will not be provided for any other visits to the school, or if the parents choose to take the young person home for any reason.

6.5 Travel training

Travel training gives people with special educational needs or disabilities the confidence and skills to travel on buses and trains. Help can also be provided for walking routes. Being able to travel on public transport is a key life skill. It lets you make choices about how you live, go about your daily life and fulfil your potential. Training can be individually tailored to the needs of the young person and include aspects like:

- confidence in using buses or trains
- personal safety
- how to use timetables and buy tickets
- road safety, including how to cope with traffic on major roads
- what to do when things go wrong (e.g. the bus is late) and
- money skills

Medway Council will offer Travel Training to support young people to access independent travel where families and carers consider this to be appropriate to their needs.

Section C

The education travel assistance
appeal process

Section C The education travel assistance appeal process

4.1 Stage One: review by a senior officer

If a pupil is assessed as not eligible for education travel assistance, applicants may wish to ask for the decision to be reviewed by a senior officer.

- i) Requests for a stage one review must be received, in writing (letter or email) to the School Services Team within 20 working days from the date of the initial formal decision notification.
- ii) The written request must detail why the parent/carer believes the decision should be reviewed and give details of any specific circumstances that they feel should be considered as part of the stage one review. The parent/carer can submit any additional evidence they wish considered in the review at this stage.
- iii) A senior officer from School Services will undertake the review and provide written notification of the review outcome within 20 working days of receipt of the request.
- iv) If the outcome of the review is to uphold the initial assessment decision not to grant education travel assistance, then full details and any relevant form regarding how to proceed to the stage two appeal will be provided.

4.2 Stage two: Appeal to independent appeal panel

If the outcome of the stage one review is to uphold the initial assessment decision not to grant education travel assistance, the applicant may pursue a formal appeal if they wish.

- i) Requests for a stage two appeal must be received, in writing, by the School Services Team within 20 working days from the date of the stage one review formal decision notification.
- ii) The appeal request must detail the reasons why the parent/carer is appealing and give details of any specific circumstances that they feel should be considered. The parent/carer can submit any additional evidence they wish considered in the appeal at this stage.
- iii) The Medway Council Democratic Services Team administers all the appeals and, once the appeal request is received, it will be lodged and the details forwarded to the Clerk for the School transport and Curriculum Appeals Committee for processing.

- iv) The School Transport and Curriculum Appeals Committee, which consists of a panel of five Councillors, will hear the appeal within 40 working days of receipt of the written request.
- v) Parents/carers will have the opportunity to attend the hearing. They can be accompanied by a friend, colleague or Ward Councillor and may choose to have a representative to help present their case. A senior School Services officer will be present to provide details of the case and the reasons why travel assistance has not been granted.
- vi) Following the appeal hearing, the committee will make their decision in private and both parties will be notified of the decision in writing from the Clerk, within five working days.

If a stage two appeal is not upheld parents/carers have a right of complaint to the Local Government Ombudsman, but only if complainants consider that there was a failure to comply with the procedural rules or if there are any other irregularities in the way the appeal has been handled. If the complainant considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review.

4.3 Grounds for review/appeal

The grounds on which a parent/carer can request a stage one review or a stage two appeal are not limited and is for parents who wish to challenge a decision about:

- a) Their child's eligibility
- b) The distance measurement in relation to statutory walking distances
- c) The safety of the route
- d) Any exceptional circumstances that the family may have.

4.4 Complaints regarding service operational matters

Any complaints relating to the operational service provided (e.g. lateness of vehicles, etc) on a specific route or service must be directed to the actual service provider.

Section D

Other travel options

Section D

Other travel options

Where a pupil is **not eligible** to receive free education travel assistance the following schemes are also available.

5.1 Medway Youth Pass

This scheme entitles all young people who live in Medway to apply for and receive a photo-card that lasts for three academic years or until the young person becomes sixteen years old (whichever is sooner).

Young people aged between sixteen and eighteen are also entitled for this scheme and will receive a photo-card that lasts to the end of the academic year in which they become eighteen.

The scheme provides for young people to pay half the adult fare for a single journey at all times when travelling on local bus services.

To qualify the journey must start in Medway and can be to any destination in Medway or Kent, as long as any change of bus takes place in Medway.

Medway Youth Passes are not valid on the subsidised yellow bus routes (MY buses) run by Medway Council or with companies that already offer a child fare.

Before applying for a Medway Youth Pass, parent/carers should verify with the appropriate bus company that the pass can be used on the relevant service/route and whether here is a more cost effective method to obtain a ticket from the bus company.

For up to date information on the cost of the Medway Youth Pass and where to apply for one, parent/carers should contact the School Services Department via the contact details provided in this policy.

5.2 Yellow Bus Scheme (MY buses)

Medway Council operates a series of bus services which supply school buses for pupils living in certain parts of Medway to travel to certain Medway secondary schools at a reduced cost than public transport.

Details of this scheme are available at <http://www.medway.gov.uk/parkingandtransport/buspasesandtimetables/schoolbustimetables.aspx>

5.3 Vacant Seat Payment Scheme (VSPS)

Children who do not qualify for free home to school transport assistance may apply for a vacant seat on a hired school vehicle, if one operates on the required route, at a cost.

It is important to understand that should a vacant seat be granted it might be withdrawn at any time if it is subsequently required by a child who is eligible to receive free home to school transport assistance, or if the transport being used is withdrawn from service.

Details of this scheme are available at

<http://www.medway.gov.uk/schoolsandeducation/gettingtoschool/vacantseatspaymentscheme.aspx>

DETERMINED



Medway Council

Home to School Transport Policy

- **Mainstream pupils**
- **Pupils with SEND**
(Special Educational Needs
and Disabilities)

This policy is for Medway resident pupils only

Authors: Programme Lead-School Services
SEND Project Manager
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Contact details

Any questions or matters arising should be directed to the relevant department.

Mainstream pupils: School Services

Email: schooltransport@medway.gov.uk

Tel: 01634 331155

SEND pupils: Special Educational Needs Team

Email: seneducationteam@medway.gov.uk

Tel: 01634 331123

Office address:

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Gun Wharf, Dock Road, Chatham, ME4 4TR

Council website:

www.medway.gov.uk

Introduction

All local authorities have a statutory duty to have in place arrangements for the provision of home to school transport for children and young people (mainstream and SEND) who meet the published eligibility criteria.

The Home to School Transport Policy is developed within a national legal framework that sets out what local authorities must do to facilitate travel to school and sets out eligibility criteria for granting that support.

Under S,7 of the Education Act 1996, it is the responsibility of the parent of every child of compulsory school age, to cause their child to receive efficient full-time education either by regular attendance at school or otherwise. The duties and powers of local authorities to provide home to school transport are covered in other sections of the Act and its amendments. The provision of transport support incorporates consideration for children from low-income families.

Sections 508B and 508C of the Education Act 1996 (as amended) sets out the local authority's duties and powers respectively, to make such suitable travel arrangements as the local authority considers necessary, to facilitate a child's attendance at school. This applies to home to school travel arrangements and vice versa. They do not relate to travel between educational institutions during the school day.

This policy has been written having regard to the Department of Education's statutory 'Home to School travel and transport guidance' published in July 2014

(<https://www.gov.uk/government/publications/home-to-school-travel-and-transport-guidance>) and the Equality Act 2010.

Part one – Eligibility criteria, definitions and general information

1.1 Standard eligibility criteria (compulsory school aged children)

The standard (basic) eligibility criteria for entitlement to receive home to school transport assistance is that:

(i) The child must live more than the minimum eligible statutory walking distance for the child's age from the school being attended, as detailed below:

For children of compulsory school age and under eight years old – the school attended must be more than two miles from the home address.

For children aged eight and over – the school attended must be more than three miles from the home address.

And

(ii) The school attended must be deemed the nearest qualifying school to the home address.

And

(iii) The child/young person must be resident in Medway. Families living outside of Medway must apply through their home local authority, even if transport is to a Medway school.

1.2 Low-income eligibility criteria (compulsory school aged children)

A low-income family is defined as one where a child is entitled to free school meals and/or if the parent is in receipt of the maximum level of Working Tax Credit.

Please Note: This definition is prescribed by Central Government and may be subject to change.

If the applicant meets the above definition of a low-income family then a child will qualify for home to school transport assistance **if they live more than two miles, but not more than six miles, from one of their three nearest qualifying schools.** This distance is extended if the child is attending a faith school on the grounds of their faith (see paragraph 1.3).

In order for the relevant assessment to be made for low-income home to school transport assistance, applicants must provide an up to date full copy of their proof of benefit with the applications or, if applying on the grounds that the child is in receipt of free school meals, applicants must complete the relevant details on the application form so that the claim can be verified.

Where transport assistance is granted under this criterion, it will be assessed on an annual basis to determine whether the pupil is still eligible.

1.3 Denominational (faith) transport (compulsory school aged children)

NB: For Medway Looked after Children and low-income families only

An application can be considered to certain faith schools where: the pupil is attending the school, it was chosen because of its faith status and the pupil is of the same faith/denomination as that of the school.

In these cases the Council will consider the school as the nearest qualifying to the home address where:

(i) It is over the minimum eligible distance (for low-income families, it must be one of the three nearest qualifying schools of the relevant faith between two and fifteen miles from the home address, as stated in the Department for Education statutory guidance)

and

(ii) It is the geographically nearest school of the relevant faith to the Medway home address

and

(iii) The pupil is of the same faith/denomination as the school concerned (proof of faith/denomination is required and the application must be countersigned by the appropriate church authority, verifying that the pupil is a regular practising member of a church of the same faith/denomination as the school concerned). If such proof is not provided, the application cannot be considered on faith/denomination grounds.

1.4 Nearest qualifying school

The definition of the nearest qualifying school is:

(a) The geographically nearest school to the pupil's home address that is suitable to the pupil's age, ability and aptitude.

(b) Only one school can be deemed as the nearest qualifying school and this may include non-Medway schools

(c) For secondary age pupils, Medway Council also take into account whether a child is of grammar ability (under the Medway Test assessment procedures) or non-grammar ability. For grammar assessed pupils a Medway grammar school will be considered as the nearest qualifying school.

(d) A preference for single sex, mixed or particular type of school or a preference for a school because of its specialism or because it teaches certain subjects cannot be taken into account.

Qualifying schools include:

(i) Community, Voluntary Controlled, Voluntary Aided and Foundation schools (including special schools for pupils with an EHCP only)

(ii) Academies and Free Schools

(iii) Non-maintained or independent special schools (for pupils with an EHCP only)

(iv) Designated specialist provision or a unit attached to a maintained mainstream school or academy (for pupils with an EHCP only)

(v) Pupil referral units (PRUs) – transport assistance is not provided for part-time PRU placements.

1.5 Expression of school preferences

When the school being attended is not the nearest qualifying school, home to school transport can only be considered if:

(a) The nearest qualifying school has been applied for as a highest named preference but not offered

(b) The nearest qualifying school has been applied for as a higher preference than the school being attended

(c) Schools have been applied for in qualifying distance order (i.e. the nearest qualifying school has been applied for as the first/highest preference, the next nearest qualifying school as the second preference, and so on. This principle and minimum eligible distances apply for all preferences.¹

If the nearest qualifying school has not been applied for or has been applied for as a lower preference than the school attended, the pupil will not be eligible for home to school transport even if over the minimum eligible distance.

1.6 Accompaniment

The general expectation is that a child will be accompanied on their journey to and from school as necessary. It is the parent/carers responsibility to ensure appropriate accompaniment, if required.

Medway Council wishes to ensure equality of opportunity for children whose parents/carers have a disability which prevents them from accompanying their child along a walking route and will consider relevant up to date medical information, when assessing a home to school transport application, as long as it is provided at the time of application and is from a GP, Consultant or other medical practitioner.

1.7 Application process timescales

All applications will be considered against each of the relevant eligibility criteria, as detailed above, and any additional parameters relevant to the individual pupil and whether they are mainstream or SEND (as detailed in parts two and three of this policy).

The estimated timescale for the processing of applications is up to four weeks from the date of receipt of the application by the relevant Medway Council department (i.e. School Services for mainstream pupils and the SEN Team for SEND pupils).

This timescale includes the application assessment, notification of decision, receipt

¹ For young people transferring from Year 6 to Year 7, parents can request for an indication of their nearest qualifying schools prior to submitting secondary school applications. A form to do so is available in the composite prospectus.

of the relevant travel pass (where applicable) and the setting up of the appropriate transport.

1.8 Definition of the home address

The address that must be used for the assessment of eligibility for home to school transport is the **pupil's main place of residence**.

If the pupil is from a separated family and may live part time with each parent at two addresses, only the main place of residence can be considered for home to school transport purposes (e.g. where the pupil is registered as living for GP's, child benefit, etc).

Medway Council can only provide transport assistance from one address and will only grant assistance for one return journey from the pupil's home address (as defined above) to school each day.

It is the responsibility of parent/carers to inform Medway Council should the home address change. In most circumstances this would require the home to school transport to be re-assessed for eligibility.

1.9 Shortest available walking route

All distances calculated for home to school transport purposes are measured using the shortest available walking route from the home address to the school address.

Distances are calculated using the Medway geographical information software and may take account of footpaths, public rights of way, etc.

The shortest available walking route is one along which a child can walk to school, **accompanied**, with reasonable safety.

The safety of a route is considered and the relevant route assessment focusses primarily on identifying the road safety risks observed along the route. Such assessments are handled in accordance with the national 'Assessment of Walked Routes to School' guidelines produced by Road Safety Great Britain (RSGB) in 2012. This states, "Case law has found that assessments must look at the relationship between pedestrians and traffic only. Personal safety issues of children travelling alone are not considered. Local authorities are not legally obliged to provide free transport just because parents perceive the route to be unsafe on the grounds of personal safety and security."

The same method of measurement and route calculation is used for all applications to ensure that the nearest qualifying school can be identified. All distances will be calculated to four decimal places in miles and metres

Ordnance Survey advise that the point on a map that co-ordinates represent will be subject to a measure of accuracy. The absolute accuracy, which is the accuracy to a point originally surveyed at 1:1250 will be +/- 0.9 metres at a 99% confidence level. As home to school distance calculations deal with a home address and a school address, it is considered that any measurements made to route a child from home to school are given an overall accuracy of +/- 1.8 metres. This is the

tolerance allowed for in all distance and route calculations.

If the route calculated is determined to be unavailable, then the distance and route is used for measurement purposes only and there is no expectation for the pupil to walk the route determined.

1.10 Limitations and matters that are not considered in home to school transport assessment

(a) Medway Council do not provide home to school transport for any child below compulsory school age in either a school, nursery or pre-school setting.

(b) Parent/carer work or other commitments

(c) Attendance of sibling at the relevant school or other schools

(d) If the parent/carer chooses for their child to attend a school that is not deemed the nearest qualifying

(e) Work experience placements

(f) Any travel between educational establishments, visits to other schools, colleges or other establishments

(g) Attendance of any out of hours clubs (e.g. breakfast and after school clubs or any extra curricular activity outside of the normal school day)

(h) Attendance at any educational provision at weekends or bank holidays or any link courses, elective lessons, etc that take place outside of the normal school day.

(i) The use of any address other than the home address. This includes any address used for childcare/childminder arrangements.

1.11 Expectations of behaviour

All children who are granted home to school transport assistance are expected to adhere to the behaviour terms and conditions of both Medway Council and the relevant transport operator.

Any ticket issued is subject to the conditions of travel set by the relevant transport operator. By signing the application form and accepting the ticket both the parent/carer and the child are agreeing to abide by such conditions of travel.

If the child misbehaves their ticket may be withdrawn either temporarily or permanently, depending on the circumstances of the individual case. In these situations the parent/carer is then responsible for their child's travel arrangements. The transport provider will advise Medway Council if a child is banned from travel and the Council will no longer accept responsibility for the child's travel nor provide alternative arrangements.

Only the child named on the ticket is entitled to use the allocated ticket. If it is found that the ticket has been misused by another child then the relevant transport

provider may pursue a prosecution against the eligible child and the child found using the ticket.

A Headteacher may also make a decision on whether a child's behaviour whilst travelling determines that transport assistance should be withdrawn. Such decisions should only be made based on sufficient evidence and following discussions with Medway Council.

1.12 Modes of transport

The route an eligible child will travel and the mode of transport to be used is determined by the Council when transport assistance is granted to ensure best value for money. This means that pupils will normally travel by public transport.

For SEND pupils their specific needs are also taken into account and may determine that they travel with other children in larger vehicles, **such as a minibus.**

The use of a taxi is not a normal mode of transport and will only be considered based on the specific needs of the child (for SEND pupils) and in exceptional circumstances (for mainstream pupil), as long as supporting documentation is provided. Decision on the use of a taxi are made on a case-by-case basis.

Part two – Home to school transport for mainstream pupils (aged 5-16)

2.1 Initial assessment

All applications will be considered against of the relevant eligibility criteria, as detailed in part one above, and the provisions of this policy.

(i) Where the initial assessment determines the pupil **is eligible** to receive home to school transport assistance, the applicant will be formally notified and the relevant travel pass issued, along with details of the transport provider/operator.

(ii) Where the initial assessment determines the pupil **is not eligible** to receive home to school transport assistance, the applicant will be formally notified of the decision and the reasons why the application has not been successful. This decision will also provide details of the appeal process (as shown in part 4 of this policy)

2.2 Transport assistance for children who move house during a critical stage

Where a family move home during a critical stage of their child's education (during Year 6, 10 or 11) home to school transport assistance **may** be granted to the current school being attended to allow completion of their course.

The minimum statutory eligible walking distance (as detailed above) and consideration of ease of access from the new home address to the school being attended will be taken into account when assessing suitability of providing transport assistance.

2.3 Requested mode of transport

On the mainstream application, parent/carers have the opportunity to express a preferred mode of transport. The options are bus, rail or fuel allowance. The fuel allowance is calculated at a cost per mile (or part thereof) for one return journey each school day. There is a maximum allocation of fuel allowance that can be granted each academic year and all allowances are issued three times per academic year (September, January and April).

For the latest information on the cost of fuel allowance per mile that can be granted, please contact School Services via the contact details set out on page 4.

2.4 Transport to independent and/or non-Medway schools for mainstream pupils

Medway Council **do not** provide home to school transport assistance for any Medway resident child attending an independent, private or fee-paying school.

In certain circumstances home to school transport assistance may be considered for a Medway resident attending a non-Medway school if said school is deemed the nearest qualifying school, or the pupil has moved house during a critical stage, or if qualifying on low-income and/or denominational grounds (as detailed in part one of this policy).

2.5 Consideration of medical needs for mainstream pupils

In exceptional circumstances, mainstream pupils may be given special consideration for home to school transport on the basis of medical grounds. If an application is being made on this basis, relevant medical evidence must be supplied at the time of application.

Such evidence must be up to date (dated no earlier than 6 months prior to the application, or the latest evidence available for long-term conditions (e.g. epilepsy, cerebral palsy, ongoing mobility conditions)).

The evidence provided must be from a GP, Consultant or other medical practitioner and must detail the child's medical needs, why the school being attended is the best suited to meet those needs and that the child is unable to access the school without transport assistance because of said medical needs and/or condition.

2.6 Home to school transport for Post-16 mainstream pupils

There is no free entitlement to home to school transport for Post-16 mainstream pupils.

Medway Council issued an annual policy statement providing information on the options available for Post-16 pupils. This can be found on the Medway Council website (www.medway.gov.uk) and selecting 'getting to school'.

Part three – Home to school transport for pupils with SEND

3.1 Applications

Parent/carers may apply for home to school transport assistance when their child has a final or amended Education, Health and Care Plan (EHCP) or a Statement of Special Educational Needs.

Medway Council will consider an application for transport when the pupil is in receipt of a proposed EHCP or when a decision has been made about a school or other placement.

3.2 Specific information for SEND pupils only

(a) Having an EHCP **does not** mean that a pupil is automatically eligible to home to school transport assistance. Eligibility is assessed based on (i) the individual needs of the pupil (taking into account their age and mobility) and (ii) the distance from home to the school being attended.

(b) For pupils attending work experience placements, transport assistance will only be considered if they rely on a wheelchair for mobility or are registered as blind.

(c) If the Council places a pupil with an EHCP in a specialist provision that is not the pupil's local school, for the purposes of this policy, such provision will be deemed to be the nearest qualifying school. The distance criteria (as shown in part one of this policy) will still apply when assessing the pupil for transport assistance.

(d) Wherever possible, parents/carers are expected to take their child to/from a pick up/drop off point. Such points will normally be within half a mile of the home address.

3.3 Type of transport provision and support

When making decisions about the type of transport provision to be granted for eligible pupils (in addition to the criteria set out in part one of this policy), including whether or not an escort is required, the Council will also consider:

- (a) the specific special educational needs of the pupil
- (b) the type of vehicle in which the pupil will be travelling in
- (c) the length of the journey (see 3.4 below)
- (d) whether the pupil is physically able to walk the home to school distance
- (e) whether the pupil is required to be accompanied by an escort.

Any transport provision granted will usually be in a shared vehicle with other pupils.

Single pupil transport will only be considered in exceptional circumstance and only where there is clear evidence to support the need. Any single pupil transport granted will be for a limited period of time and there is an expectation for the pupil to return to shared transport at the end of the specified period.

Transport assistance may be provided in various ways including a bus pass for use

on public services, an escort to accompany the child on foot or on public transport, a mini bus or, in very exceptional circumstances, an individual taxi.

The expectation is that as the pupil grows older and matures they use public transport wherever possible.

3.4 Length of journey

In normal circumstance the maximum journey time will be no more than 45 minutes for a pupil of primary school age and 75 minutes for a pupil of secondary school age, in accordance with statutory guidance.

In some individual circumstances (dependent on where the pupil lives and/or the location of the school being attended) it may not be possible to ensure this.

3.5 Consideration of medical needs for SEND pupils

In exceptional circumstances, SEND pupils may be given special consideration for home to school transport on the basis of medical grounds. If an application is being made on this basis relevant medical evidence must be supplied at the time of application.

The evidence provided must be from a GP, Consultant or other medical practitioner and must detail the child's medical needs, why the school being attended is the best suited to meet those needs and that the child is unable to access the school without transport assistance because of said medical needs and/or condition.

In addition, transport assistance may be provided where the parent/carer is unable to accompany their child due to their own medical conditions. Relevant medical evidence from a GP, Consultant or other medical practitioner is required.

3.6 Residential educational provision

For pupils placed in a 52 week residential school, Medway Council will provide one return journey at the start and end of the placement. Transport support will not be provided for any other visits to the school, or if the parent/carer chooses to take their child home for any reason.

For pupils placed in a residential school on a weekly, fortnightly or termly basis travel support will be provided according to the residential agreement. In these circumstances, Medway Council will provide one return journey at the start and end of the week, fortnight or term, as applicable. Travel support will not be provided for any other visits to the school, or if the parents choose to take their child home for any reason.

3.7 Provision of escorts

Escorts will only be provided in exceptional circumstances. These include:

- (a) Where a number of children are travelling together and require supervision.
- (b) Where a child has a severe medical condition that requires support during transportation, a suitably trained escort may be provided.

Any request for an escort must be supported by detailed evidence that demonstrates the risk to the child and/or others. The evidence provided must include an up to date risk assessment and detail other strategies that have previously been applied.

Where an escort is provided, this requirement will be reviewed every 6 months. The need for an escort may change as the child grows older.

An escort's duty is to supervise pupils on the vehicle. They will assist pupils to board and to leave the vehicle but they cannot collect pupils from their home and take them into a school if that would mean leaving other pupils unattended in the vehicle.

Escorts' duties also include the delivery of notes, medication or money between home and school.

It is the parent/carers responsibility to supervise the pupil from the house to the vehicle and the duty of the school staff to get the child from the vehicle into the school building. At the end of the day school staff supervise the pupil's entry to the vehicle and parents/carers must supervise the pupil from the vehicle into the home.

Guidelines are issued for operators, drivers and escorts. All drivers and escorts will be required to undergo training and will carry an identity card which will be renewed every three years following a new Disclosure and Barring Service (DBS) check.

Where a pupil has a life-threatening condition we encourage parent/carers to act as escort. If this is not possible we will endeavor to provide an appropriately qualified escort, but this cannot be guaranteed.

3.8 Transport changes due to extreme weather

On rare occasions, severe weather may impact on Medway Council's ability to arrange transport safely. Where severe weather results in the requirement to cancel transport every effort will be made to notify parents at the earliest opportunity.

If transport is cancelled the Council will, wherever possible, try to give parents an indication of when it is likely to resume. If transport is cancelled due to extreme weather, the following is applicable:

(a) Where a route is cancelled and a parent/carer takes the decision to transport their child themselves, the parent/carer remains responsible for the return journey or any consequent costs should a return journey not be possible

(b) The parent/carer remains responsible for their child

Where a pupil is placed in residential provision and is unable to be transported home, the school and the parent/carer are responsible for ensuring that suitable arrangements are made for the child. This may include an extended stay in school, or overnight accommodation with an appropriate adult. If a child attends a residential school and is unable to get to school due to severe weather, a and b apply.

3.9 Time keeping

In order to enable drivers to keep to schedule and to pick up and return pupils home at the times agreed, parents are expected to have their child ready at appropriate times and be there to collect them when they are expected home.

A driver will wait for no more than three minutes beyond the scheduled pick-up time at a pick-up point in the morning.

If there is no-one to collect a child at the end of a school day, the driver will take the child on for the remainder of the journey and return to the agreed destination once all the other students have been delivered to their destinations. The child will not be left unescorted and will not be left with anyone other than the parent/carers without their written authorisation.

If the parent /carer is still not there to meet the child, and where there is no suitable alternative, Medway Council's Children's Safeguarding Team will be contacted and the child may be taken into care.

3.10 Transportation of equipment

Pupils are expected to travel with no more than one item of hand luggage.

Pupils attending residential schools are expected to travel with no more than one suitcase (or equivalent). Parents of a child who has extra items (e.g. to meet their medical or physical needs) are required to make prior arrangements to include these.

3.11 Review of transport provision

Unless otherwise agreed, Travel Arrangements will be reviewed on a regular basis, usually as part of the Annual Review process.

3.12 Pupil safety whilst travelling

The safety of children who are eligible for support with transport is Medway Council's first priority. In particular, Medway Council will ensure that:

- (a) All drivers and escorts have been checked and cleared by the Disclosure and Barring Service (DBS) and carry identity cards
- (b) Seat belts are provided and used on all contract vehicles.
- (c) Car seats/booster seats are provided in accordance with current Government legislation.
- (d) Escorts receive appropriate training and are familiar with safety and emergency equipment.

3.13 Personal allowances

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The Children and Families Act (2014) introduced the option for parents to ask for a personal budget for some elements of a child's Education Health and Care (EHC) Plan.

Although entitlement to travel assistance rarely forms part of an EHC Plan, Medway Council uses its discretionary powers to treat home to school/college travel as if it were part of an EHC Plan. This means that parents can ask for the cost of travel assistance to be paid as a personal cash allowance, and to make their own arrangements to ensure their child gets to school. This might include taking the child themselves or paying someone else to provide the service.

A personal allowance cannot cost the local authority more than it would otherwise cost to provide the service. A travel allowance will not normally be offered when there is a place available on existing transport and at a cost less than the cost of payment to parents/carers.

In cases where a pupil would be travelling a route not served by existing contract transport and the cost of providing individual transport would be costly, parents will be offered an allowance to cover the cost of travel.

A travel allowance is normally payable at an agreed rate for the journey to and from school where the child is transported i.e. two journeys.

Claims for an agreed travel allowance must be presented monthly and received by the Council's SEN Team no later than the 14th of each month to enable payment of travel allowance for the preceding month. No other time schedule is possible. It is the responsibility of parents/carers to submit the claim on time. Claims received for travel allowance outside of the specified time frame will not be paid.

Claims should be for the actual mileage incurred. Where claims are discovered to be for amounts greater than is justified, the Authority will seek reimbursement and will refer cases of fraud to the Police.

Claims must be in the format prescribed on the template invoice. All claims must be presented on the appropriate pro-forma.

3.14 Transport arrangements for learners aged over 16 but under 25 with learning difficulties and or disabilities

Medway Council has a duty under DFE "Post 16 Transport to Education and Training" Statutory Guidance for local authorities (February 2014) to consider travel arrangements for learners with learning difficulties and/or disabilities.

The Guidance states that the transport needs of young people with learning difficulties and/or disabilities should be reassessed when a young person moves from compulsory schooling to post 16 education.

The Guidance also strongly recommends travel training schemes to enable young people with learning difficulties and/or disabilities to gain skills which can be used for travelling to education or training, particularly because of the all round benefits.

Eligibility

A Statement or Special Educational Need or an Education, Health and Care Plan does not provide automatic entitlement to free travel arrangements.

An application must be completed and Medway Council will consider travel arrangements for young people with learning difficulties and/or disabilities who are resident within Medway, subject to a Statement of Special Educational Needs or an Education, Health and Care Plan, aged over 16 but under 25, and who live more than 3 miles (by shortest available walking distance) from the education institution or training provider.

Arrangements

If a young person is eligible, one of the following travel arrangements may be provided:

- A travel card.
- Travel training (with a travel card).
- A travel card with a “walking escort”.
- A place on a hired vehicle.
- A personal allowance, based on the distance from home to school/college (as requested either by the young person or by his/her parent/carer)

Arrangements will be appropriate to the needs of the young person and follow the DFE guidance to promote independent travel skills.

Travel provision on a hired vehicle or with a walking escort must be between one defined “home address” and the educational institution or training provider.

Travel provision on a hired vehicle or with a walking escort will be made for the days during the academic year on which the young person attends the educational institution or training provider.

Travel provision on a hired vehicle or with a walking escort may be subject to change to an alternative provider at the discretion of Medway Council. There will be no right to appeal regarding the change in this case.

Travel arrangements will be reviewed in line with the Person Centred Annual Review process, and may change to an alternative arrangement depending on the updated needs of the young person.

What cannot be considered

Medway Council is not able to take the following into account when considering transport entitlement: for eligible young people with learning disabilities and/or disabilities:

- The work commitments of family members or carers with whom the young person may live.
- Attendance by siblings at other schools, educational institutions or training providers.

- A work experience placement (other than as agreed by Medway Council SEN as part of the young person's course or training and which takes place during the academic year and core hours for the educational institution or training provider).
- A journey from one educational establishment to another.
- Ad hoc visits to other schools, colleges or other establishments.
- Out of educational hours activities.
- Link courses/elective lessons/sessions/courses that take place outside normal educational institution or training provider hours.
- Any educational provision or training planned over weekends or bank holidays.

3.15 Young people over the age of 16, but under the age of 25 in residential educational provision

Where a young person is placed in a 52 week residential provision school transport arrangements are not provided. In these circumstances, Medway Council will provide one return journey at the start and end of the entire placement. Transport arrangements will not be made for any other visits to the school, or if the parent/carer chooses to take the young person home for any reason.

Where a young person is placed in a residential school, other than on a 52 week residential basis, transport arrangements will be provided according to the residential agreement (dependent on weekly, fortnightly or termly fee arrangements). In these circumstances, Medway Council will provide one return journey at the start and end of the week, fortnight or term, as applicable. Transport support will not be provided for any other visits to the school, or if the parents choose to take the young person home for any reason.

Part four – The home to school transport appeal process

4.1 Stage One: review by a senior officer

If a pupil is assessed as not eligible for home to school transport assistance, applicants may wish to ask for the decision to be reviewed by a senior officer.

(i) Requests for a stage one review must be received, in writing (letter or email) by the relevant Medway Council department (i.e. School Services for mainstream pupils and the SEN Team for SEND pupils) within 20 working days from the date of the initial formal decision notification.

(ii) The written request must detail why the parent/carer believes the decision should be reviewed and give details of any specific circumstances that they feel should be considered as part of the stage one review. The parent/carer can submit any additional evidence they wish considered in the review at this stage.

(iii) A senior officer from the relevant department will undertake the review and provide written notification of the review outcome within 20 working days of receipt of the request.

(iv) If the outcome of the review is to uphold the initial assessment decision not to grant home to school transport assistance, then full details and any relevant form regarding how to proceed to the stage two appeal will be provided.

4.2 Stage two: Appeal to independent appeal panel

If the outcome of the stage one review is to uphold the initial assessment decision not to grant home to school transport assistance, the applicant may pursue a formal appeal if they wish.

(i) Requests for a stage two appeal must be received, in writing by the relevant Medway Council department (i.e. School Services for mainstream pupils and the SEN Team for SEND pupils) within 20 working days from the date of the stage one review formal decision notification.

(ii) The appeal request must detail the reasons why the parent/carer is appealing and give details of any specific circumstances that they feel should be considered. The parent/carer can submit any additional evidence they wish considered in the appeal at this stage.

(iii) The Medway Council Democratic Services Team administers all the appeals and, once the appeal request is received, it will be lodged and the details forwarded to the Clerk for the School transport and Curriculum Appeals Committee for processing.

(iv) The School Transport and Curriculum Appeals Committee, which consists of a panel of five Councillors, will hear the appeal within 40 working days of receipt of the written request.

(v) Parents/carers will have the opportunity to attend the hearing. They can be accompanied by a friend, colleague or Ward Councillor and may choose to have a

representative to help present their case. An officer from the relevant department will be present to provide details of the case and the reasons why transport assistance has not been granted.

(vi) Following the appeal hearing, the committee will make their decision in private and both parties will be notified of the decision in writing from the Clerk, within five working days.

If a stage two appeal is not upheld parents/carers have a right of complaint to the Local Government Ombudsman, but only if complainants consider that there was a failure to comply with the procedural rules or if there are any other irregularities in the way the appeal has been handled. If the complainant considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review.

4.3 Grounds for review/appeal

The grounds on which a parent/carer can request a stage one review or a stage two appeal are not limited and is for parents who wish to challenge a decision about:

- (a) Their child's eligibility
- (b) The distance measurement in relation to statutory walking distances
- (c) The safety of the route
- (d) The transport arrangements offered
- (e) Any exceptional circumstances that the family may have.

4.4 Complaints regarding service operational matters

Any complaints relating to the operational service provided (e.g. lateness of vehicles, etc) on a specific route or service must be directed to the actual service provider. For SEND pupils on hired vehicles this is the Council's service provider, Medway Norse.

Part five – Other transport options

Where a pupil is **not eligible** to receive free home to school transport assistance, the following schemes are also available.

5.1 Medway Youth Pass

This scheme entitles all young people who live in Medway to apply for and receive a photo-card that lasts for three academic years or until the young person becomes sixteen years old (whichever is sooner).

Young people aged between sixteen and eighteen are also entitled for this scheme and will receive a photo-card that lasts to the end of the academic year in which they become eighteen.

The scheme provides for young people to pay half the adult fare for a single journey at all times when travelling on local bus services.

To qualify the journey must start in Medway and can be to any destination in Medway or Kent, as long as any change of bus takes place in Medway.

Medway Youth Passes are not valid on the subsidised yellow bus routes (MY buses) run by Medway Council or with companies that already offer a child fare.

Before applying for a Medway Youth Pass, parent/carers should verify with the appropriate bus company that the pass can be used on the relevant service/route and whether there is a more cost effective method to obtain a ticket from the bus company.

For up to date information on the cost of the Medway Youth Pass and where to apply for one, parent/carers should contact the School Services Department via the contact details provided in this policy.

5.2 Yellow Bus Scheme (MY buses)

Medway Council operates a series of bus services which supply school buses for pupils living in certain parts of Medway to travel to certain Medway secondary schools at a reduced cost than public transport.

Details of this scheme are available at <http://www.medway.gov.uk/parkingandtransport/buspasesandtimetables/schoolbustimetables.aspx>

5.3 Vacant Seat Payment Scheme (VSPS)

Children who do not qualify for free home to school transport assistance may apply for a vacant seat on a hired school vehicle, if one operates on the required route, at a cost.

It is important to understand that should a vacant seat be granted it might be withdrawn at any time if it is subsequently required by a child who is eligible to receive free home to school transport assistance, or if the transport being used is

withdrawn from service.

Details of this scheme are available at

<http://www.medway.gov.uk/schoolsandeducation/gettingtoschool/vacantseatspaymentscheme.aspx>

Appendix 5 – Summary of Proposed Changes

Key proposed changes to the Policy wording

The proposed policy document has been re-named ‘Education Travel Assistance Policy’ in line with the consultation proposal and recommendations. The proposed policy is set out at Appendix 3 to the report; proposed changes are highlighted in grey to assist navigation of the document.

The proposed policy document has been substantially re-organised to reflect feedback from service users and Medway Council’s legal team that the existing policy can be confusing in terms of differentiating between legislation and policy applicable to mainstream and SEND pupils.

The proposed policy document is, therefore, more clearly subdivided into the following sections:

- **Section A**
Education travel assistance for mainstream pupils of compulsory school age (5-16)
(refer to ‘Part one’ and ‘Part two’ of the existing policy)
- **Section B**
Education travel assistance for SEND pupils
(refer to ‘Part three’ of the existing policy)
- **Section C**
The education travel assistance appeal process
(refer to ‘Part four’ of the existing policy)
- **Section D**
Other travel options
(refer to ‘Part four’ of the existing policy)

Section B, in particular, has been reorganised to clearly differentiate between information relating to (i) Eligibility criteria, (ii) Assessment and outcomes, (iii) Operational issues and (iv) Learners aged between 16 and 25.

Section A

Education travel assistance for mainstream pupils of compulsory school age (5-16)

Section A – part one

Eligibility criteria, definitions and general information

General

The ‘Home to School Transport’ definition has been amended to ‘Education Travel Assistance’ throughout. This reflects the consultation proposal and recommendations.

Sub-section 1.3 – Denominational (faith) travel assistance

Para 1.3 (ii) – the ‘geographically nearest school’ criteria has been removed from this bullet point.

Sub-section 1.7 – Application process timescales

‘Four weeks’ has been further clarified as ‘20 working days’.

Sub-section 2.1 – Initial assessment and treatment

Typographic correction ‘of’, replaced with ‘all’

Section B

Education travel assistance for SEND pupils

(refer to ‘Part 3’ of existing policy, set out at Appendix 4 to the report)

General

The Home to School Transport definition has been amended to ‘Education Travel Assistance’ throughout.

‘Escort’ has been redefined as ‘passenger assistant’ throughout.

Some content within the existing policy has been reorganised to clearly differentiate:

- Eligibility criteria, definitions and general information
- Assessment and outcomes
- Operational issues
- Travel Assistance arrangements for learners aged between 16 and 25 with SEND

Section B – part one

Eligibility criteria, definitions and general information

Sub-section 3.1 – Applications

Second para: This clarifies that the decision in relation to an appropriate education placement to meet the needs of the pupil is made by the Council in consultation with parents/carers. The term ‘Other educational placement’ has been added in addition to ‘school’.

Sub-section 3.2 – Eligibility criteria

- (a) This amendment clarifies that distance criteria only applies where transport is not required in relation to SEND. Otherwise it is the ‘needs’ of the young person that take precedence.

Sub-section 3.4 ‘Length of journey’ (existing policy)

Moved to Section B – part three (proposed policy)

Sub-section 3.6 Residential educational provision (existing policy)

Moved to Section B – part two (proposed policy)

Sub-section 3.7 – Provision of escorts (existing policy)

Moved to Section B – part two (proposed policy)

Sub-section 3.8 – Transport changes due to extreme weather (existing policy)

Moved to Section B – part three (proposed policy)

Sub-section 3.9 – Time keeping (existing policy)

Moved to Section B – part three (proposed policy)

Sub-section 3.10 – Transportation of equipment (existing policy)

Moved to Section B – part three (proposed policy)

Sub-section 3.12 – Pupil safety whilst travelling (existing policy)

Moved to Section B – part three (proposed policy)

Section B – part two
Assessment and outcomes

Sub-section 4.1 – Travel assistance arrangements

This section has been substantially updated to reflect the changes proposed in the consultation and the addition of the weekly SEN Travel Assistance Panel to review all applications.

Sub-section 4.2 – Review of transport provision

This paragraph has been clarified to include the proposed annual review process, overseen by the SEN Travel Assistance Panel.

Sub-section 4.3 – Personal allowances

This section has been substantially updated to reflect the changes proposed in the consultation and the inclusion of Personal Travel Assistance Budgets, in addition to cash allowances.

Sub-section 4.4 – Allocation of transport

This section has been substantially updated to reflect the changes proposed in the consultation and the inclusion of Personal Travel Assistance Budgets, in addition to cash allowances.

Pick-up points have been clarified to reflect that the Council and contractors will always give due consideration to the age and needs of the child and their route to/from the pick-up point.

Sub-section 4.5 – Provision of passenger assistants

This section has been updated in relation to:

- Risk assessments
 - Challenging behaviour
 - Training
-

Section B – part three Operational issues

Sub-section 5.3 – Time keeping

‘appropriate’ times, redefined as ‘appointed or scheduled times’

Section B – part four Travel Assistance arrangements for learners aged between 16 and 25 with SEND

Sub-section 6.2 – Student contribution

This section has been updated to reflect the consultation proposal and to clarify the justification for the student contribution.

Sub-section 6.3 – Travel Assistance Arrangements

This section has been updated to clarify the annual review process and the Council’s aspiration to support independence in relation to the provision of travel assistance.

Sub-section 6.5 – Travel training

This section has been added to reflect the consultation process and clarify how travel training will be promoted, in consultation with parents / carers and the young person.

Appendix 6

TITLE Name / description of the issue being assessed	SPECIAL EDUCATIONAL NEEDS (SEN) HOME TO SCHOOL TRANSPORT CONSULTATION AND POLICY REVIEW
DATE Date the DIA is completed	2 March 2018
LEAD OFFICER Name, title and dept of person responsible for carrying out the DIA.	Graham Tanner Programme Lead, Children's (0-25) Partnership Commissioning

1 Summary description of the proposed change

- What is the change to policy / service / new project that is being proposed?
- How does it compare with the current situation?

Local authorities have a statutory duty to ensure that, for eligible children and young people with special educational needs, suitable travel assistance arrangements are made, where necessary, to facilitate a child's attendance at school. The legislation governing this duty is section 508B of the Education Act 1996.

Medway's Home to School Transport Policy (April 2017) defines the Council's policy and processes for meeting these statutory duties.

Meeting its statutory duty is putting increasing pressure on the council budget as the number of eligible children requiring travel assistance, the complexity of their needs and the cost of providing travel assistance increases.

On 21 November 2017 Cabinet agreed to a public consultation on a number of amendments and clarifications to the policy to ensure that travel assistance support can continue to be provided to all eligible children and young people in line with increasing demand (decision number 132/2017 refers). Amendments will also provide the opportunity to offer a more flexible range of options to families and improve the quality of service provision. The Council is committed to ensuring that young people with SEN are provided with opportunities to develop and learn to be independent as possible, as they transition into adulthood.

The following amendments and clarifications to the policy are proposed:

PROPOSAL - ONE (Definition of Education Travel Assistance)

It is proposed that the name of the Home to School Transport Policy for pupils with SEN be amended to 'Education Travel Assistance Policy'. The name change reflects the fact that travel assistance can be provided in a variety of ways, not just through the provision of 'transport' e.g. a bus or a taxi.

PROPOSAL - TWO (To formalise the annual application and review process)

Currently travel assistance arrangements for children and young people are assessed and determined at the time they start at a new education setting. This means, for example, that a young person starting in Year 7 may have their travel assistance arrangements rolled forward until they finish in Year 11. This approach does not always take account of the personal development of individual children and young people, opportunities to promote independence and any changing individual or family

circumstances e.g. medical needs.

A simple online application and review form will be introduced to support this process.

PROPOSAL - THREE (*Personal travel assistance budget (PTAB) and cash allowance*)

Where a child or young person is eligible, care will be taken to ensure that travel assistance is provided in the most appropriate and least restrictive way possible. In the case of high volume routes, shared transport arrangements are likely to continue to be the most cost effective and sustainable solution under most circumstances. However, in the case of solo or ad-hoc arrangements a cash allowance or direct payment in the form of a Personal Travel Assistance Budget may provide greater flexibility for families and carers to make their own arrangements.

This would mean that every new application for travel will be considered for a cash allowance or, in cases of complex or exceptional needs, a direct payment in the form of a Personal Travel Assistance Budget. Other direct support will continue to be available where appropriate, for example a travel pass for public transport, a walking escort or shared transport.

Personal Travel Assistance Budgets (PTABs) represent the value of the cash allowance, plus an additional payment to support parents/carers to arrange personalised, flexible travel arrangements that suit the needs of their child and family. Under this arrangement parents/carers would not need to show the Council how their PTAB is spent. Parents/carers could spend the budget however they like as long as their child is supported to attend school regularly and on time.

Five key distance bands are proposed to calculate the standard amount offered in relation to a Personal Travel Assistance Budget.

This is the maximum proposed allocation for each distance banding and each application will be considered on an individual basis, taking into account the level of additional needs and requirements.

Distance bandings Annual Personal Travel Assistance Budget cap Equivalent cash allowance value for maximum distance within this banding (based on a return journey @ 40p/mile reimbursement rate and 190 school days per year)

Table 1 – Proposed Personal Travel Assistance Budgets in relation to distance banding

Distance bandings	Annual Personal Travel Assistance Budget cap	Equivalent cash allowance value for maximum distance within this banding (based on a return journey @ 40p/mile reimbursement rate and 190 school days per year)
3 miles and under	£1,000	£456
3.1 miles to 5 miles	£1,200	£760

Diversity impact assessment

5.1 to 7 miles	£1,800	£1,064
7.1 to 10 miles	£2,500	£1,520
>10 miles	£5,000 *	As determined by mileage

* £100 per mile for each additional mile in excess of 10 miles, PTAB capped at £5,000

PROPOSAL - FOUR (Travel training)

Travel training gives people with special educational needs or disabilities the confidence and skills to travel on buses and trains. Help can also be provided for walking routes. Being able to travel on public transport is a key life skill. It lets you make choices about how you live, go about your daily life and fulfil your potential. Training can be individually tailored to the needs of the young person and include aspects like:

- confidence in using buses or trains
- personal safety
- how to use timetables and buy tickets
- road safety, including how to cope with traffic on major roads
- what to do when things go wrong (e.g. the bus is late) and
- money skills

Medway Council is looking to source a provider of Travel Training to support young people to access independent travel where families and carers consider this to be appropriate to their needs.

It is recognised that it will be important to work with parent/carers and education settings to identify suitable young people for travel training and to work within the young person's time frame.

PROPOSAL - FIVE (Pick up points)

The Council's existing Home to School Transport Policy already includes the use of 'pick-up points' i.e. a central location where a mini-bus or taxi will pick-up and drop-off pupils travelling on any given route. However, travel companies have not regularly been doing this when planning their routes. Pick-up points will not be appropriate for all routes.

It has been suggested that from September 2018, all contractors will be asked to consider safe pick-up and drop-off points for their routes, taking into account the needs of individual pupils allocated to that route. Such arrangements will potentially benefit pupils by minimising the amount of time they are required to spend sat in transport on the journey to and from school.

A pick up or drop off point may be a public car park or other suitable location and would require the support of all parent/carers to ensure they are available at the allocated time.

PROPOSAL - SIX (Respite)

The Council recognises the value of Short Breaks and respite in supporting families and carers of children and young people with disabilities. In some circumstances transport to

and from the location of that respite care will be integral to that support. At the current time, the Council supports and funds transport to respite to a range of settings, some of which is planned and others which are more ad hoc. Ad hoc short notice requests from parents and carers are challenging to accommodate and can cause disruption and therefore incur additional cost to planned travel arrangements.

It is therefore proposed that the Home to School Transport Policy is revised to require at least 5 working days' notice to set up any such arrangements (exceptional circumstances will be supported). Families requiring respite may also be offered a Personal Travel Assistance Budget to support them to manage these arrangements themselves.

PROPOSAL - SEVEN (Post 16 transport)

Whilst young people are now required by law to be engaged in education, employment or training up to the age of 19, Local Authorities do not have a statutory duty to provide home to school/college transport free of charge for learners aged 16 to 19 in the same way as they do for primary and secondary aged pupils up to the end of Year 11. Subsidised post-16 transport is, therefore, a discretionary provision.

In line with many other Local Authorities, it is therefore proposed that Medway pupils accessing 16+ education, for example attendance at college, will be required to contribute to their travel assistance arrangements.

All students aged 16-18 (Year 12-14) who require assistance travelling to school or college will be required to pay a contribution towards the total cost of travel. This contribution will be reviewed annually and published within Medway's Post-16 Travel Assistance statement. This applies regardless of whether they are living in the parental home.

Learners/parents/carers will be notified of the cost of contribution in advance of the young person attending Post 16 provision. This will be done once a request for travel support has been approved.

Requests for payment will be made termly at the beginning of each term. Contributions must be paid immediately so that transport arrangements can be made. In the event that there is a problem with the contribution the Council must be contacted at the earliest opportunity.

Where a young adult with a learning difficulty and/or disability aged 19 – 25 has a named education / training provider in their Education, Health and Care (EHC) Plan, and, if taking into account their personal circumstances, transport is necessary to enable them to access this provision, then transport to/from the place of learning/training will be arranged on an individual basis without charge.

It is proposed that the pupil contribution for 16-18 (Year 12-14) be set at £600 per academic year with a 25% reduction for low income families (instalment options to be available). Pupils accessing post 16 education will be offered a Personal Travel Assistance Budget or travel pass, or under exceptional circumstances an allocation may be made on shared transport.

Any travel assistance offered would therefore be less than contribution.

2 Summary of evidence used to support this assessment

- eg: Feedback from consultation, performance information, service user records etc.
- eg: Comparison of service user profile with Medway Community Profile

In 2016, The Association of Directors of Children's Services (ADCS) contacted all Directors of Children's Services to request information on home to school transport spend in 2015/16. The data received showed that local authorities across England spent approximately £1 billion on home to school transport during 2015/16.

The main findings of the ADCS survey have resonance in Medway and were:-

- LAs are transporting an **increasing number of children with SEND** (partly because of the SEND reforms and the extension of support to young people aged up to 25), many of whom have highly complex needs (health and behaviour) so require individual transport, escorts and specialist vehicles.
- There is a **shortage of local mainstream school places and specialist educational provision** and, as a result, LAs are required to transport children to educational facilities out of area. In addition, a lack of local foster care capacity is resulting in an increased number of out of area placements which require transport to school.
- The **geographical nature** of some LAs means that a significant number of children live outside of the 'statutory' walking distance. This is coupled with a lack of public transport so LAs must provide other, more costly forms of transport.
- Differences in **start and finish times** for post-16 provision results in transport being designed around individual timetables, which is not cost effective. Similarly, where siblings attend different schools with the same start and finish times, parents are unable to transport both children and so look to the LA for transport support.
- The **lack of capacity in the transport market** is driving up costs – a lack of providers and therefore competition, a lack of specialist vehicles and an increased focus on quality.

The above national issues affecting SEN Transport are reflected in Medway. A benchmarking exercise undertaken shows that Medway's cost per pupil is low in comparison to other unitary authorities. However, the complexity of need contributes towards the level of spend. This has led to a heavy reliance on ad hoc solo taxi arrangements. This is an expensive option of providing travel assistance. It is therefore important that taxis are used as the last resort and all SEN transport arrangements are managed within the Framework Contract and reviewed at a panel. It is also considered that the options for SEN travel assistance need to be expanded to include personal travel budgets, travel training, and pick up points.

Following approval from Cabinet on 21 November 2017, a consultation commenced on Friday 5 January 2018 and ran to Friday 16 February 2018. The consultation included:

- pre-consultation and co-production discussion with the Medway Parents and Carers Forum (MPCF);

- online information and questionnaire at medway.gov.uk/sen;
- a letter to all families on the SEN database (not just those in receipt of home to school travel assistance);
- a letter to Medway schools;
- an email to transport providers; and
- an information session at a scheduled Medway Parents and Carers Forum coffee morning at Gillingham Golf Club on Tuesday 30 January.

132 responses were received to the questionnaire.

70 people (including Medway Council staff and MPCF Committee members) attended the information session on 30 January.

The response to the public consultation was generally mixed with no clear consensus in respect of any of the proposals. The exception to this was the introduction of a financial contribution for students in academic years 12 to 14 (age >16 to <19) where only 20% of respondents were in agreement.

Understandably service users were concerned with the likely impact on their own circumstances and arrangements. Key concerns included:

- whether the value of cash allowances or Personal Travel Assistance budgets would fully cover the costs of travel arrangements;
- perceived administrative burden for families; and
- whether children and young people would be forced into arrangements which did not adequately meet their needs and/or place them at risk.

Equally a large number of respondents agreed with the proposals, provided adequate safeguards were in place to ensure that children, young people and their parents/carers were fully engaged with any decision making in relation to their own arrangements.

Full details concerning the consultation feedback are contained within the report to Children and Young People's Overview and Scrutiny Committee (8th March 2018) and associated Appendices.

The report recommends the following:

PROPOSAL - ONE (Definition of Education Travel Assistance)

The proposal to rename the 'Home to School Transport' Policy (SEND and Mainstream as 'Education Travel Assistance' is important to emphasise that the Council is not obliged to offer 'travel assistance' in the form of vehicular transport as the default option.

For the most part, respondents did not have strong views either way and it is therefore recommended that PROPOSAL ONE is implemented.

PROPOSAL TWO - Annual application and review process

Formalising the annual application and review process is considered to be the best

solution for ensuring that travel arrangements for individual pupils are routinely reviewed in line with their needs and requirements. It is important to stress that this is not an assessment and review of eligibility for travel assistance (unless a change of address or other material change of circumstance dictates that such eligibility requires review).

The annual application and review process will ensure that the needs and requirements of all pupils are consistently assessed and reviewed and that travel assistance continues to be provided in line with the young person's changing needs and personal development (with the support of families and carers).

The majority of respondents were either in Agreement or Unsure about this proposal. It is recommended that PROPOSAL 2 is implemented but that work is undertaken with the SEN team to streamline review processes, in so far as is possible.

PROPOSAL THREE (Part 1) - *Personal travel assistance budget / Cash allowance (PATB)*

- 32% of respondents were in agreement with the proposal to introduce Personal Travel Assistance Budgets.
- 38% were unsure.
- 30% disagreed with the proposal.

The majority of those who disagreed were concerned about their individual circumstances.

Guidelines in relation to Direct Payments / Personal Budgets are clear i.e. they cannot be implemented without the express agreement and support of recipients and therefore, as described, it is proposed that PROPOSAL THREE is implemented in discussion and agreement with individual families for whom such an arrangement may be beneficial.

PROPOSAL THREE (Part 2) - *Personal Travel Assistance Budget (PTAB) Values*

The majority of respondents either disagreed or were unsure about the proposed distance bandings and funding levels for Personal Travel Assistance Budgets (PTAB). The levels that have been proposed are set as a premium payment over and above the 40p per mile cash allowance rate and are based on levels provided by other comparator authorities.

The purpose of a PTAB is to meet reasonable additional costs associated with a young person's journey to school, over and above reimbursement of fuel. They are not designed to be a payment towards a parent or carers time.

As discussed above, a PTAB can only be implemented with the express support of the recipient.

It is recommended that PROPOSAL 3 is implemented for applications for travel assistance in 2018/19 but that funding levels are kept under regular review in line with

the evidenced costs of supporting individual travel assistance arrangements.

PROPOSAL FOUR – *Travel Training*

44% of respondents agreed with this proposal. 24% disagreed.

It is therefore recommended that **PROPOSAL FOUR is implemented** and that the Council seeks to source a provider of Travel Training to support young people to access independent travel where families and carers consider this to be appropriate to their needs.

It's recognised that it will be important to work with parent/carers and education settings to identify suitable candidates for travel training and to work within the young person's time frame.

PROPOSAL FIVE - *Pick Up Points*

The majority of respondents either disagreed with or were unsure about this proposal.

The majority of concerns related to pupils with learning disabilities and challenging behaviour, for whom respondents considered such arrangements to be unsafe, parents/carers who were concerned about timekeeping of other parents/carers and parents/carers who were concerned about the impact on sibling and work travel arrangements.

It is important to stress that there is no legal obligation for the council to provide a door to door service unless a pupil's EHC Plans or other assessment of need determines this to be essential.

In light of concerns, however, it is proposed that PROPOSAL FIVE be partially implemented in 2018/19 and that commissioners and transport providers work with a small cohort of willing participants to pilot this approach on specific routes. The effectiveness and viability of these pilot arrangements will be reviewed prior to any wider roll-out.

PROPOSAL SIX - *Respite*

The majority of respondents (52%) were in favour of this proposal with just 10% disagreeing.

Those who did disagree were primarily concerned with unexpected and/or crisis circumstances which may necessitate short-term arrangements. The proposal makes clear that any such exceptional circumstances will be supported where possible although the Council cannot guarantee to meet every request.

It is important to ensure that, where possible, as much notice as possible is provided to offer the best chance for Travel Assistance Co-ordinators to secure appropriate and cost effective arrangements.

It is, therefore, proposed that PROPOSAL SIX is implemented.

PROPOSAL SEVEN - *Post 16 transport, financial contributions*

The majority of respondents either disagreed or were unsure about the proposal to routinely request a contribution towards travel assistance arrangements for 16 to 18 year olds (Academic Years 12-14). 20% were in favour.

As discussed in section 4.2.7 of the report, whilst young people are now required by law to be engaged in education, employment or training up to the age of 19, Local Authorities do not have a statutory duty to provide home to school/college transport free of charge for learners aged 16 to 19 in the same way as they do for primary and secondary aged pupils up to the end of Year 11. Subsidised post-16 transport is, therefore, a discretionary provision.

Local Authorities have discretion to determine transport and financial support in their area and must publish their policies on this. A large number of Local Authorities already require a financial contribution.

There is no formula or calculation to determine the appropriate levels of this contribution. The £600 proposed (with a 25% reduction for low income families) is an approximate average, based on a review of other Local Authorities' charges and also broadly aligns to the cost of a student bus pass in Medway (£620).

The imposition of any financial contribution will never be popular but the Council is currently an outlier in terms of not imposing a charge. It is interesting to note that 20% of respondents are in favour.

It is therefore recommended that PROPOSAL SEVEN is implemented and included within the Council's refreshed Post-16 transport to education and learning policy.

Contributions are required for both mainstream and SEN students in this age cohort so this is not discriminatory. The value of the contribution will not exceed the cost of a Medway student bus pass and therefore no young person will be financially disadvantaged if their EHCP identifies an education setting further afield. A reduced contribution rate (-25%) will be agreed for low income families.

3 What is the likely impact of the proposed change?

Is it likely to :

- Adversely impact on one or more of the protected characteristic groups?
- Advance equality of opportunity for one or more of the protected characteristic groups?
- Foster good relations between people who share a protected characteristic and those who don't?

(insert ✓ in one or more boxes)

Protected characteristic groups (Equality Act 2010)	Adverse impact	Advance equality	Foster good relations
Age	✓		
Disability		✓	

Diversity impact assessment

Gender reassignment	N/A	N/A	N/A
Marriage/civil partnership	N/A	N/A	N/A
Pregnancy/maternity	N/A	N/A	N/A
Race	N/A	N/A	N/A
Religion/belief	N/A	N/A	N/A
Sex	N/A	N/A	N/A
Sexual orientation	N/A	N/A	N/A
Other (eg low income groups)	✓	N/A	N/A

4 Summary of the likely impacts

- Who will be affected?
- How will they be affected?

It is considered that the following protected characteristics may be impacted by this change.

Age

Under 5s

Children under statutory school age will not be provided with travel assistance. This may impact families of 'rising 5's' starting in reception or families where children attend nursery or pre-school.

This represents a clarification to the existing policy.

Post-16 students

Pupils accessing post 16 education may be required to contribute from their Disability Living Allowance and/or access any available bursary or funding available from their college in order to offset the cost of any transport award. Pupils and/or their parents/carers will be required to clarify this contribution at the point of applying for transport. Any top up will be agreed through Panel in the form of a cash allowance or Direct Payment.

Disability

SEN travel assistance by definition impacts on children and young people with disabilities and their families/carers. Any policy revisions will continue to ensure that

Medway Council continues to meet statutory duties to ensure that, for eligible children and young people with special educational needs, suitable travel assistance arrangements are made, where necessary, to facilitate a child's attendance at school based on an assessment of individual need.

Low income groups

Low income is one category under which eligibility for education travel assistance is considered. Any policy revisions will continue to ensure that Medway Council continues to meet statutory duties to ensure that, for eligible children and young people with special educational needs, suitable travel arrangements are made, where necessary, to facilitate a child's attendance at school based on a robust assessment of individual need.

5 What actions can be taken to mitigate likely adverse impacts, improve equality of opportunity or foster good relations?

- What alternative ways can the Council provide the service?
 - Are there alternative providers?
 - Can demand for services be managed differently?
- Medway Council has consulted with stakeholders and affected groups, prior to recommending changes to policy.
 - Medway Council will seek to expand the flexibility of support options, e.g. through the introduction of Direct Payments.
 - Medway Council will clearly communicate any changes to policy to help inform decision making by families when applying for school and college places from September 2018.
 - Medway Council will introduce a panel process to assess all applications and ensure consistent application of policy in allocating travel assistance.
 - A rigorous appeals process will ensure that no families are unfairly impacted by any changes to policy.

In relation to specific proposals:

PROPOSAL TWO - Annual application and review process

Work will be undertaken with the SEN team to streamline the review processes, in so far as is possible, including the creation of a new web based application process.

PROPOSAL THREE (Part 1) - Personal travel assistance budget / Cash allowance (PATB)

Guidelines in relation to Direct Payments / Personal Budgets are clear i.e. they cannot be implemented without the express agreement and support of recipients and therefore, as described, it is proposed that PROPOSAL THREE is implemented in discussion and agreement with individual families for whom such an arrangement may be beneficial.

PROPOSAL THREE (Part 2) - *Personal Travel Assistance Budget (PTAB) Values*

Funding levels will be kept under regular review in line with the evidenced costs of supporting individual travel assistance arrangements.

PROPOSAL FOUR – *Travel Training*

It's recognised that it will be important to work with parent/carers and education settings to identify suitable candidates for travel training and to work within the young person's time frame.

PROPOSAL FIVE - *Pick Up Points*

In light of concerns raised , it is proposed that PROPOSAL FIVE be partially implemented in 2018/19 and that commissioners and transport providers work with a small cohort of willing participants to pilot this approach on specific routes. The effectiveness and viability of these pilot arrangements will be reviewed prior to any wider roll-out.

PROPOSAL SEVEN - *Post 16 transport ,financial contributions.*

Contributions are required for both mainstream and SEN students in this age cohort so this is not discriminatory. The value of the contribution will not exceed the cost of a Medway student bus pass and therefore no young person will be financially disadvantaged if their ECP identifies an education setting further afield. A reduced contribution rate (-25%) will be agreed for low income families.

6 Action plan

- Actions to mitigate adverse impact, improve equality of opportunity or foster good relations and/or obtain new evidence

Action	Lead	Deadline or review date
Consultation with existing recipients of education travel assistance and other stakeholders / affected groups.	Partnership Commissioning	16/02/18
Clear communication of any proposed policy changes or additional travel assistance options.	Partnership Commissioning	30/04/18
Implementation of mitigation measures as described in this DIA.	Partnership Commissioning	30/04/18
Robust panel process to ensure consistent application of policy in allocating education travel assistance for children and young people with SEN.	Partnership Commissioning	31/10/17
Ongoing monitoring and review.	Partnership Commissioning	Ongoing

7 Recommendation

The recommendation by the lead officer should be stated below. This may be:

- to proceed with the change, implementing the Action Plan if appropriate
- consider alternatives
- gather further evidence

If the recommendation is to proceed with the change and there are no actions that can be taken to mitigate likely adverse impact, it is important to state why.

Following consultation it is recommended that proposals be implemented as described, along with the mitigation measures as described above.

The impact of the proposals will continue to be monitored over the next 12 months and consideration given to additional mitigation as required.

8 Authorisation

The authorising officer is consenting that:

- the recommendation can be implemented
- sufficient evidence has been obtained and appropriate mitigation is planned
- the Action Plan will be incorporated into the relevant Service Plan and monitored

Assistant Director

Helen Jones, Assistant Director for Commissioning, Business and Intelligence

Date

2 March 2018

Contact your Performance and Intelligence hub for advice on completing this assessment

RCC:	phone 2443	email: annamarie.lawrence@medway.gov.uk
C&A (Children's Social Care):	contact your usual	P&I contact
C&A (all other areas):	phone 4013	email: jackie.brown@medway.gov.uk
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