



Derby City Council

COUNCIL CABINET
12 July 2017

ITEM 10

Report of the Cabinet Member for Education
and Skills

Post 16 Home to School Transport Consultation Outcome

SUMMARY

- 1.1 Derby City Council remains absolutely committed to improving outcomes for children and young people with Special Educational Needs and Disabilities (SEND), and supporting our vulnerable children and young people.
- 1.2 The Council currently spends £3,200,000 per year on transport assistance; the majority of which is for children and young people with Education, Health and Care Plans (EHCP) or Statements of Special Educational Need who are placed at schools/colleges within Derby and outside of the city. Within the overall budget, the Council currently spends around £600,000 to provide free discretionary transport for Post 16 students with SEND.
- 1.3 Council Cabinet, at its meeting on 08 February 2017, approved an eight week consultation period which ran from 20 February 2017 to 17 April 2017 to consult on a proposal to change the way in which the Council provides free discretionary transport for Post 16 students with SEND, whilst maintaining its duty to ensure that every child and young person in the City has access to a school/college place. For some children, the Council, of course, has a legal duty to provide free transport assistance. It is important to clarify that the proposals, or the development of any future proposals, will not impact on this group of children to whom this duty applies.
- 1.4 In order to ensure there was full consultation, a number of engagement meetings were held with key stakeholders, parents and carers, representative groups, including the Parent Carer Forum, Voices in Action, Independent Travellers, the Special Educational Needs and Disabilities Information Advice and Support Service (SENDIASS), and the Council's Equality and Diversity Lead.
- 1.5 In total there were 144 responses to the consultation, with comments also received via telephone conversations, letters and e-mails. A detailed report of the consultation outcome is attached as Appendix 2. Responses to the consultation broadly fell into two categories:
 - a) Those who generally agreed with the proposals in principle, but raised significant concerns, or felt there were considerations to be made, with regard to the transport application and assessment process, and specific detail on how this would operate;

- b) A smaller group who disagreed with the purpose and principle of the transport proposals.
- 1.6 The Council has listened very carefully to parents and carers in each of the consultation meetings, and has also thoroughly analysed all of the 144 responses received. As a result of this very helpful engagement, the proposal is to develop alternative options which would help the Council achieve the required SEND post 16 transport savings.
- 1.7 A report setting out alternative options will be presented to Council Cabinet for consideration in September 2017. There will then be a further stage of consultation with parents, carers and SEND partners.

RECOMMENDATION

- 2.1 To approve scoping of alternative options for SEND Post 16 transport savings.
- 2.2 To approve the continuation of the successful Independent Travel Training Initiative.

REASONS FOR RECOMMENDATION

- 3.1 Responses received, as outlined within Appendix 2, indicate that the development of a point based system may not be viable in ensuring that a number of young people with SEND receive appropriate transport assistance.
- 3.2 The Independent Travel Training Programme continues to be successful in supporting children and young people with SEND. Since 2014, 121 young people who previously travelled in taxis/minibuses are now travelling independently, the majority being Post 16 students.



Derby City Council

COUNCIL CABINET **12 July 2017**

Report of the Strategic Director of People Services

SUPPORTING INFORMATION

Background

- 4.1 Derby City Council remains absolutely committed to improving outcomes for children and young people with Special Educational Needs and Disabilities. However, like every Local Authority, the Council continues to face considerable pressures on public services and is required to make significant savings.
- 4.2 The Council's Medium Term Financial Plan (MTFP) requires the Council to achieve savings of £200,000 in discretionary transport.
- 4.3 The Council currently spends circa £3,200,000 per year on transport assistance; the majority of which is for children and young people with Education, Health and Care Plans (EHCP) or Statements of Special Educational Need who are placed at schools/colleges within Derby and outside of the city. Within the overall budget, the Council currently spends around £600,000 to provide free discretionary transport for Post 16 students with SEND.
- 4.4 Whilst the majority of transport assistance funds pupils who are legally eligible for free transport, the Council also provides free transport for other children and young people at its discretion for Post 16 students with SEND.
- 4.5 Council Cabinet, at the meeting on 08 February 2017, approved an eight week consultation period which ran from 20 February 2017 to 17 April 2017 to consult on a proposal to change the way in which the Council provides free discretionary transport for Post 16 students with SEND, whilst maintaining its duty to ensure that every child and young person in the City has access to a school/college place, and for some the Council legal duty to provide free transport assistance.
- 4.6 A number of engagement meetings were also held with key stakeholders, parents and carers, representative groups, including Derby City Parent Carer Forum, Voices in Action, Independent Travellers, the Special Educational Needs and Disabilities Information Advice and Support Service (SENDIASS) and the Council's lead on Equality and Diversity.

4.7 The proposals set out within the consultation included:

- Developing a point based system for SEND Post 16 transport that would be co-produced with parents to determine eligibility and the level of transport assistance required on an individual basis, ensuring that the most vulnerable young people receive the most appropriate level of assistance;
- Continuation of the Independent Travel Training Initiative – since 2014, 121 young people, who previously travelled in taxis or mini buses, are now travelling independently in and around our City, with 96 young people with SEND now fully accessing Post-16 education;
- Updates to the Home to School Transport Assistance Policy.

4.8 **Consultation Outcomes**

A detailed report showing a summary of responses to the consultation is attached as Appendix 2.

4.9 In total, there were 144 responses to the consultation, with comments also received through telephone conversations, letters and e-mails. Overall, respondents to the consultation fell broadly into two groups:

- a) Those who generally agreed with the proposals in principle, but had significant concerns, or felt there were considerations to be made, with regard to the transport application and assessment process, and specific detail on how this would operate;
- b) A smaller group who disagreed with the purpose and principle of the transport proposals.

- 4.10 There were some broad themes mentioned throughout the consultation running through every question. The most common were:
1. Transport – types, logistics;
 2. The detail of the points based system – how it would work;
 3. Finances – costs and making savings;
 4. Safety;
 5. Impact on or access to education;
 6. Concerns about the proposals;
 7. Comments about the way the Independent Travel Training Initiative (ITT) works;
 8. Positive comments about the proposal to extend ITT;
 9. Suggestions/ comments on assessment methods;
 10. Involvement of key stakeholders.
- 4.11 **Proposal to develop a point based system** - comments received were divided into the three sub-themes; clarity on how the point based system would work; concerns raised with the proposal; and those who agreed with the proposal.
- 4.12 Derby City Parent Carer Forum also submitted a detailed response, the conclusion of which is detailed below:
- “We believe a points system should not be implemented, we have formed this conclusion from listening to feedback from our membership and speaking to many parent carers throughout the consultation period, therefore as the voice for parent carers, we will not be partaking in the creation of a point based system as we feel this would be against the wishes of our members.*
- “We are open to discussion on the way forward and wish to enter further discussions on further options based on best practice drawn from other Local Authorities and our colleagues from the national network of parent care forums, in the interest of our parent carers, children, young people and their families in Derby City. We recommend that the proposed policy is revisited to ensure that it is statutorily compliant.”*
- 4.13 **Proposal to expand the Independent Travel Training Initiative (ITTI)** - comments received were overwhelmingly positive about the ethos and purpose of the ITT. A large number of respondents agreed with the proposals in principle, but some raised concerns, or felt there were considerations to be made, with regard to process, the mechanics and the detail of the scheme.

- 4.14 **Proposal to update the Home to School Transport Assistance Policy** – the policy was updated taking into consideration feedback from the consultation. For ease of reference, updated information included within the revised policy is set out below:-
- Council departments addresses and contact details;
 - Officer Reviews to include reviews for children and young people with special educational needs and/or disabilities to reflect current practice and Department for Education guidance;
 - explanations of 'suitable' school's;
 - legislative terminology, for example, Criminal Record Bureau (CRB) now referred to as Disclosure and Barring Service (DBS);
 - inclusion of the Council's Independent Travel Training Programme;
 - Appeals - eligibility, timelines and how they are processed and considered.
- 4.15 In view of the consultation responses, and following very careful consideration and analysis of each response, the proposal is to develop alternative options to achieve the Council's required SEND post 16 savings. The consultation responses have considerable variation, and therefore it is sensible and appropriate to consider the merit/viability of accommodating some or all of the issues raised to inform a view about whether there are alternative options that could properly be explored.
- 4.16 An Equalities Impact Assessment (EIA) has been completed and is attached as Appendix 3. A further EIA will be conducted should agreement to scope and develop alternative options is reached.
- 4.17 A report setting out these alternative options will be presented to Council Cabinet for consideration in September 2017, followed by a further stage of consultation. The Council fully recognises that any proposed change must be carefully considered, including seeking the views of parents, carers and other key SEND partners, representatives and stakeholders.

OTHER OPTIONS CONSIDERED

- 5.1 To develop a point based system and implement changes to the ways in which the Council provides free discretionary transport for Post 16 students with SEND.
- 5.2 To restrict the expansion of the Independent Travel Training Initiative.

This report has been approved by the following officers:

Legal officer	Olu Idowu, Head of Legal Services
Financial officer	Alison Parkin, Head of Finance – People Services
Human Resources officer	None
Estates/Property officer	None
Service Director(s)	Gurmail Nizzer, Director of Commissioning (Acting)
Other(s)	Lisa Melrose, Head of Integrated Commissioning

	Ann Webster, Equality and Diversity Lead Olu Idowu, Head of Service, Legal
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For more information contact: Background papers: List of appendices:	Diane Whitehead, Head of School Organisation and Provision (Acting) Tel: 01332 642720 Email: Diane.Whitehead@derby.gov.uk Appendix 1 – Implications Appendix 2 – Derby City Council Home to School Transport Consultation 2017 – Outcome report. Appendix 3 – Equalities Impact Assessment
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IMPLICATIONS

Financial and Value for Money

- 1.1 The Council spends circa £3,200,000 per year on home to school/college transport assistance. The Council currently transports 172 Post 16 students with SEND at a cost of approximately £610,000 per year.
- 1.2 In considering the summary outcomes of the consultation, responses raised issues around a point- based system that could accurately identify and support those in most need, whilst achieving the required Council savings of £200,000 over the next two years.

Legal

- 2.1 There is a duty on Local Authorities to assess the school travel needs of their area to promote the use of sustainable modes of transport under section 508 Education Act 1996.
- 2.2 In exercising that duty, the Council must consider DfE guidance 501-2014 'Home to School Travel and Transport guidance', and DfE guidance 025-2014 'Post 16 Transport to Education and Training'.

Personnel

- 3.1 There may be an impact on roles as different types of transport provision are sourced.

IT

- 4.1 None noted.

Equalities Impact

- 5.1 An Equalities Impact Assessment (EIA) has been completed and is attached as Appendix 3. A further EIA will be conducted should agreement to scope and develop alternative options is reached.

Health and Safety

- 6.1 None noted.

Environmental Sustainability

- 7.1 None arising from this report.

Property and Asset Management

8.1 None noted.

Risk Management

9.1 There is a risk that Post 16 students do not attend, drop out part way through their course if transport is no longer provided.

Corporate objectives and priorities for change

9.2 All people in Derby City will enjoy achieving their learning potential for a brighter future.

DERBY CITY COUNCIL HOME TO SCHOOL TRANSPORT CONSULTATION 2017

Report of Results

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1. Background

- 1.1 The Council has a legal responsibility to ensure that every child in the city has access to a school place; for some children the Council has a legal duty to provide free home to school or college transport.
- 1.2 In view of the budget pressures and savings the Council is required to make, consultation was undertaken on proposals to changes for the Special Educational Needs and Disability (SEND) post 16 discretionary transport.
- 1.3 The proposals include:
 - Developing a points based system for SEND post 16 transport that would be co-produced with parents to determine eligibility and the level of transport assistance required on an individual basis, ensuring that the most vulnerable young people receive the most appropriate level of assistance.
 - Expanding the Independent Travel Training (ITT) Initiative – Since 2014, 121 young people, who previously travelled in taxis or mini buses, are now travelling independently in and around our city, with 96 young people with SEND now fully accessing post-16 education.
 - Updates to the Home to School Transport Assistance Policy - The current policy requires updating to ensure the information included is timely and accurate.
- 1.4 The following report provides a summary of the key findings.

2. Methodology

- 2.1 An eight week consultation period was undertaken from 20 February 2017 until 17 April 2017.
- 2.2 The main methods of capturing feedback were;
 - letters sent to all those parents and carers who receive SEND Post 16 transport with an online link to the survey
 - a postal questionnaire that was provided upon request
 - emails sent to providers/settings/support groups
 - through collaborative meetings with parents and carers and representative groups

3. Data in the report

- 3.1 Data from the closed questions is presented in the report as a % score from strongly agree to strongly disagree. This data is rounded up or down to the nearest whole percentage point. Charts or tables therefore may result on occasions adding up to 99% or 101%. If a tables or chart does not match exactly to the text in the report this occurs due to the rounding up or down when responses are combined. Results that differ in this way should not have a variance that is any larger than 1%.
- 3.2 When reading the data, please note that there is a base number against all charts and tables; this is the valid response meaning that the results are based on all respondents giving a valid answer to a question.
- 3.3 In total there were 144 responses to the consultation, with additional comments also received through letters and emails. Table 1 below shows the number of responses made by each method.

Table 1. Consultation responses

Source of comment	Number of responses
Online responses	133
Paper responses	11
Letters and emails	6
Representative groups (Parent Carer Forum)	1

4. Summary of key findings

4.1 Overall

- 4.1.1 Overall respondents to the consultation fell broadly into two groups;
 - a) those that generally agreed with the proposals in principle, but had concerns or felt there were considerations to be made with regard to process, the mechanics, and the detail.
 - b) a smaller group who disagreed with the purpose and principle of the proposals.
- 4.1.2 There are some broad themes that were mentioned throughout the consultation, running through every question. The most common were:
 - 11. Transport – types, logistics;
 - 12. The detail of the points based system – how it would work;
 - 13. Finances – costs and making savings;
 - 14. Safety;
 - 15. Impact on or access to education;
 - 16. Concerns about the proposals;
 - 17. Comments about the way the Independent Travel Training Initiative (ITT) works;
 - 18. Positive comments about the proposal to extend ITT;
 - 19. Suggestions/ comments on assessment methods;
 - 20. Involvements of key stakeholders;

4.2 General proposal to consider some changes to discretionary Post 16 Special Educational Needs and Disabilities (SEND) transport

- 4.2.1 When given the opportunity to make overall comments on the considered changes, the largest number of comments raised concerns.
- 4.2.2 The elements of the consultation that the most respondents commented on were the potential introduction of a points based system and the proposal to extend the ITT.

4.3 Proposed points based system

- 4.3.1 Over half of those who responded to the consultation (59.3%) agreed that the best way to determine levels of need or eligibility would be to co-produce a points based system but 23.6% disagreed.
- 4.3.2 In the comments it came across strongly that respondents wanted more information or detail about this or they queried the specifics about how such a system could work.
- 4.3.3 Other key themes emerging were the importance of involving all stakeholders; and ensuring fairness/ equity in any new system.

4.4 Independent Travel Training Initiative

- 4.4.1 Comments received about ITT were generally positive with many supporting the ethos behind the training and understanding the importance of maximising independence. Just under half of respondents (43%) agreed that the Council should expand the ITT with over a quarter (27.5%) disagreeing and almost a third responding neutrally.
- 4.4.2 Common themes emerging from the comments about ITT include comments about the existing scheme; positive feedback about the proposal; suggestions or comments about assessment methods; and concerns about safety. A key point was that ITT was not for all young people and that it should only be expanded to those it is appropriate for.

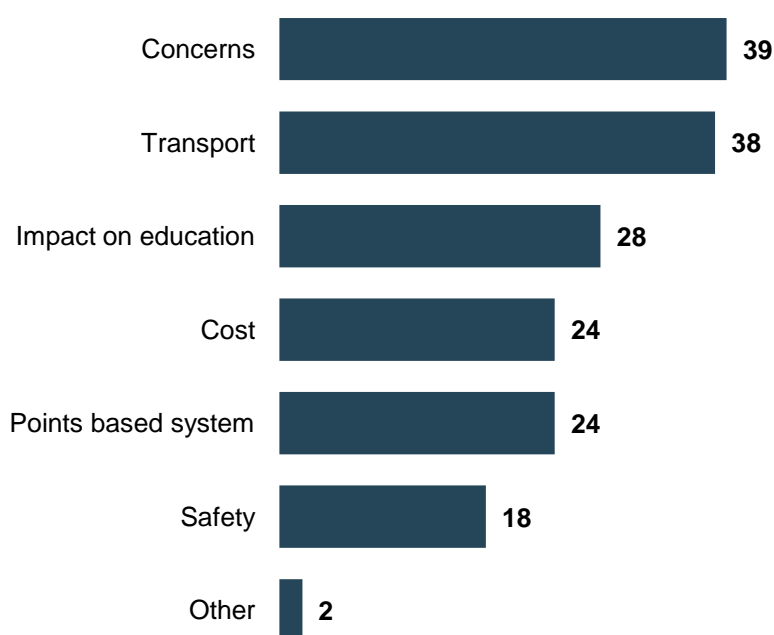
5. Main findings

5.1 Proposal to consider some changes to discretionary Post 16 Special Educational Needs and Disabilities transport

5.1.1 Participants of this consultation were invited to make any general comments they may have on all the changes that were being proposed including the need for change; the potential introduction of a points based system; the potential expansion of the Independent Travel Training Initiative (ITT); and proposed changes to the Home to School Transport Assistance Policy.

5.1.2 **73**¹ respondents gave their views in response to the nature of the changes being proposed. Seven broad themes emerged [Chart 1].

Chart 1: Coded comments about the potential proposed changes in general (number made under each broad theme)



Base: 73 respondents (respondents could make multiple comments so numbers will not total 73)

¹Many respondents made multiple comments so the total number of themed comments will not add up to 73.

5.1.3 These broad themes are explored in more detail under the headings below.
Figure 1 – Word cloud of comments made on the proposals (50 most common words)



5.1.4 Safety

- 18 comments concerning safety were made which generally identified the vulnerability of the children/young people *“In respect of my own child, I cannot imagine him catching a couple of buses to get to school. He has no sense of danger and limited vocabulary, whilst giving the appearance of a 'normal' child, he would be extremely vulnerable. I could not accept that, which would therefore have a knock on effect to my employment and that of his mother's employment”.*
- Other responses discussed the proposals from the parent's viewpoint: *“Being a parent of a SEND child is a tough and often challenging role. Your child can be violent and aggressive. They can be demanding and thoughtless. They lack common sense and have the academic age of a toddler in many cases”*
- One response detailed the experience of one student that had attempted ITT; *“I feel putting her through ITT has road safety issues for herself and car users and she has found it extremely overwhelming the doctors and the travel trainer and myself have expressed our concern”*

5.1.5 Transport

- Of the seven sub-themes, three were specifically focused on transport methods; namely taxi, bus, and car.
- Regarding transport methods, comments included:

“As a parent of a young person with severe autism who depends on the consistency of a regular driver/escort to enable him to access school, I find the consultation proposals rather alarming”.

“special needs children that don't socialise well I think it's good for them to be on a bus with others”

“personally if I had a car and I could drive I would gladly take my daughter to college, as it is I don't have this skill”

- The remaining four sub-themes concerned escort provision, independent travel training, school transport as a general comment and the involvement of schools.
- ITT attracted the most comments (22) and responses varied from those that felt the training could be beneficial to those that were positive – with caveats, to those who felt travel training would not be suitable in any circumstances. Examples of these contrasting viewpoints are as follows:

“We have been offered the travel training, and are awaiting our turn. I think this will be very beneficial to my son”.

“Whilst I like the independence the Independent Travel Training Initiative provides, this doesn't work for everyone. If trialled and it didn't work, then a timely referral back into other transport options should be initiated. The council doesn't work quickly or smartly when moving from one activity/function into another. So maybe a include a timeframe for this occurrence”

“Independent Travel Training is not suitable for most SEN Students. Most have learning difficulties and confident issues and would be putting them at risk situations”.

- Of the five comments provided about Home to School Transport, two discussed the necessity of the provision for those students where independent travel would not be achievable. ***“I believe that transport should be provided to the most vulnerable young adults. It is important not just for safety reasons but also for young adults to be able to deal with being in close proximity to peers and appropriate behaviour shown”***
- Although receiving the fewest numbers of comments, escort provision and involvement of schools did highlight other considerations:
“I do feel escorts should have at least basic training on manual handling, behaviour management, what to do in an emergency, the understanding of how to deal with someone who needs medical intervention such as seizures, have some background knowledge of the person they are travelling with for theirs and the persons safety”
“Please work in conjunction with schools to get a realistic view of the needs and abilities of the young people.”

5.1.6 Impact on education

- Under the broad heading of impact on education, four distinct themes became apparent. These were: post 16 education, school, school location and withdrawing provision.
- Most comments received concerned school location; accounting for 43% (12) of the comments. Typically the comments discussed difficulties accessing education out of area if transport was not provided.

“We would support that aim in principle, i.e. for her to be given the necessary training and support to make the [train and bus journeys involved] independently”.

- Another common theme emerged from comments referring to post 16 provision specifically. Comments varied within this category; however several raised the point that post 16 education was mandatory, ***“The document doesn't address: if post 16 travel is discretionary why is now mandatory for children to stay in education or training until they are 18?”***
- Others were concerned that independent travel was not possible for some 16 year olds: ***“There seems to be a heavy emphasis on discretionary transport for Post 16 SEND students, as if they should somehow be making themselves capable of more independent travel to help the Council save money.”***
- With regard to the remaining sub themes, all of the five responses given within the ‘withdrawing provision’ category asserted that the direct effect of stopping home to school transport would mean that their child would no longer be able to access education. ***“would say quite categorically that a withdrawal of my sons assisted transport would make it impossible for him to continue his education”***
- Responses in the school theme identify the positive benefits that accessing education has for their child/young person: ***“College helps him to develop as much as he is capable and allows him to mix with peers of his own age. It would be very stressful for me (his mother) to take him to college - the transport is a life line”***

5.1.7 Cost

- Sub themes that emerged under the broad heading of cost included Derby City Council, cuts, fuel reimbursement and parents/families.
- As expected, of prime concern to respondents was that the needs of vulnerable young people would not be met as a result of the need to balance the budget. Suggestions were made by some about where Council money should be spent and others argued that current provision was cost effective. ***“I***

feel that vulnerable young adults shouldn't be made to feel forced into ITT just for the sake of DCC needing to save money”.

- The sub-theme ‘cuts’ yielded similar results but did not identify Derby City Council as responsible for the reduced budget
“This proposal makes me worried, because those of us who have special educational needs and/or disabilities have seen services and support being cut due to cuts in funding and loss of specialist staff who understood disability”
- Others requested clarification on the reason for the cuts and overspend:
“without providing any details of what the root cause(s) of the overspend are (poor budgeting, changes in costs, increased demand?) rather than from having identified something in the current arrangements that is not meeting the needs of students and their families.”
- In terms of fuel reimbursement and parents/families, similar responses were gleaned. Discussion was on the benefits of petrol reimbursement as a cost effective method for families to access education and the impact that withdrawing post 16 travel would have to families in terms of cost and support.

5.1.8 Point based system

- Comments were made here about the point based system proposal. These were divided into the three sub-themes; clarity of the mechanics of the point based system; concerns raised with the proposal; and those who agreed with the proposal.
- Seven responses requested more information on a proposed points based system; *“the point system is not outlined, what are these points and who decides how they are to be awarded?”*
- 15 people raised concerns about the proposed point based system, comments ranged from fairness of such a system, to implementation and appeals procedure and incorporating an impact assessment.
“Whilst points based systems appear, in theory, to have merits, they are invariably difficult to implement and to apply in practice – and rely very heavily on not only being ‘fit for purpose’, but being applied as intended, by suitably qualified and trained personnel, and with an appropriate appeal mechanism. It is essential any such system is operated within a framework, and by personnel, that are completely separated from budgetary or financial responsibilities or accountabilities. If this is not the case, the system will not be transparent or fair, and ultimately will not be credible.”
- Two respondents agreed with the proposed point system – one a travel training provider.

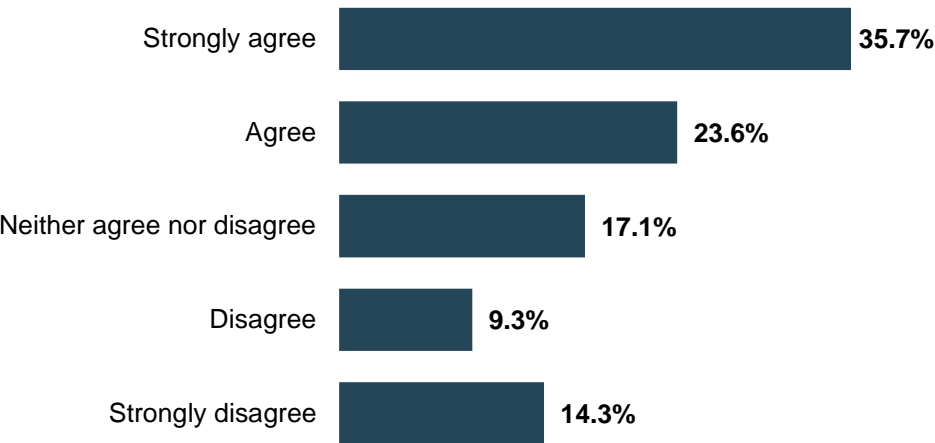
5.1.9 Concerns

- Five sub-themes emerged – impact on family; impact on the young person; information; proposals; and personal viewpoint. The largest number of comments fell into the ‘proposals’ category accounting for 39% of responses (15).
- Concerns from family included impact on other children, logistics of getting their child/young person to school, additional stress and their quality of life.
“We as parents have enough to deal with by fighting for basic needs and equipment; we fight for and are given minimum respite care, school until the age of 19 is a lifeline for not only the child but the parents, carers and siblings too”.
- Those who raised concerns about impacts to the young person identified additional stress, level of capability and concern that potential is not fulfilled.
“a young person with ASD may only be able to use public transport at off peak times due to sensory overload and social difficulties. Or they may cope with one route but not another. Either assistance must be provided or the education placement needs to provide flexible times”.
- With regard to information, topics varied from confusion of post 16 proposals when educational placements remain until 18 years; transparency of discussion within the document and when or how the process might start.
- This was mirrored in the proposals sub-theme where respondents commented that they did not feel fully informed about the proposals, that the consultation heavily pushed the independent travel training over other options. Others felt that it was an aspiration but not achievable for all. ***“Developing independence skills can be two steps forward, one step back, a long protracted process. This needs to be taken into account in any new policies together with a low pressure approach and the ability to reinstate taxis etc. quickly if independence skills regress.”***
- In personal viewpoint, respondents gave an account of the young person’s disability and how home to school transport was required. Their concerns incorporated both the experience for the family as well as the difficulties the young person would face.

5.2 Feedback on the proposed points based system

- 5.2.1 As part of the consultation, views were sought on the potential introduction of a points based system to determine the eligibility and the levels of transport to be provided. This system, if introduced, would be co-produced with parents and carers and would decide assistance on an individual basis. The Council would ensure that the most vulnerable Post 16 SEND students remain the highest priority, continuing to receive the appropriate level of transport assistance.
- 5.2.2 Over half of those who responded to the consultation (59.3%) agreed that the best way to determine levels of need or eligibility would be to co-produce a points based system; however almost a quarter (23.6%) disagreed, many of whom strongly [Chart 2].

Chart 2: Extent to which respondents agreed or disagreed with the potential introduction of a points based system.

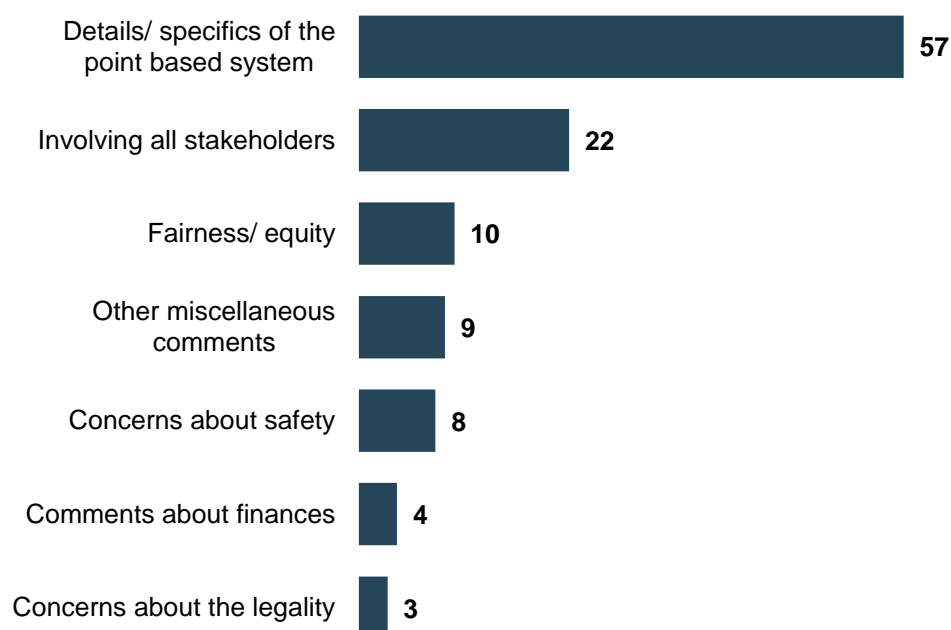


Base: 140 respondents

- 5.2.3 Respondents were given the opportunity to comment on the potential introduction of a new system such as this. **72²** respondents gave their views. A number of key themes emerged from these comments, the most common being about the potential detail of a points based system and how it would work (57). Many other comments related to the importance of involving all stakeholders (22) and concerns about fairness/ equity (10) [Chart 3].

² Many respondents made multiple comments so the total number of themed comments will not add up to 72.

Chart 3: Coded comments about the potential introduction of a points based system (number made under each broad theme)



Base: 72 respondents (respondents could make multiple comments so numbers will not total 72)

5.2.4 In order to explore this feedback, the comments can be assessed in more detail under each of the broad themes (below).

5.2.5 Details/ specifics of the points based system

- 22 comments were made stating concerns about the introduction of a points based system. Many worried that individual issues or differences would not be recognised under such a system *“My fear is that a one size fits all system will leave many not meeting the criteria and being denied what they need”*.
- 14 other comments specifically touched upon individual needs *“the points system is a start, but we need it to be more individual as no two people are the same and disabilities come in every size; some you can see and some you can’t one size doesn’t fit everyone”*.
- Several other respondents sought more clarity on how the system would work *“It would concern me how the points are worked out and on what evidence”*. Others made reference to all the things that should be considered if such a system is introduced. Whilst many agreed with the proposal in principle, it was the logistics or detail they were unsure of.

5.2.6 Involving all stakeholders

- Several respondents emphasised the importance of involving families in the development of the scheme and ensuring that parents are listened to in this process, *“I agree that local service users and their families should be at the heart of any decisions made about them”*

- Several others urged that the Council involve other groups in the production and decision making of this scheme – specifically teachers, support groups and teaching assistants. *“I agree that local support charities should get a very loud voice in order to co-ordinate and bring together the quiet voices of most young people and their families who otherwise will not get heard”*.
- Other respondents urged that the consultation is meaningful and not a ‘tick box’ exercise and that the co-production is genuine. *“The effectiveness of this will be dependent upon all stakeholders being involved in the development of the system”*.

5.2.7 Fairness/ equity

- Many respondents supported the concept but urged the Council to ensure fairness *“there has to be a fair way to do this and this is as good as any”*.
- Others were concerned that the introduction of a points based system did not seem fair, they were concerned that all considerations would not be taken into account in a system such as this *“as each child/young person is so individual it would be very difficult to make a points system that was fair to all”*.

5.2.8 Concerns about safety

- Some comments were made about the need to protect the most vulnerable and the need for adequate risk assessment, ensuring that safeguarding is always prioritised. *“As long as the welfare and support for the SEND students is foremost”*.

5.2.9 Concerns about finances

- Four comments were made about financing a new system; these included concerns about the Council putting cost cutting first; costs to families; and the potential costs of implementing and running such a system *“Any proposal to implement such a system should be based on an impact assessment, including the cost of establishing, implementing and operating the system”*.

5.2.10 Concerns about the legality

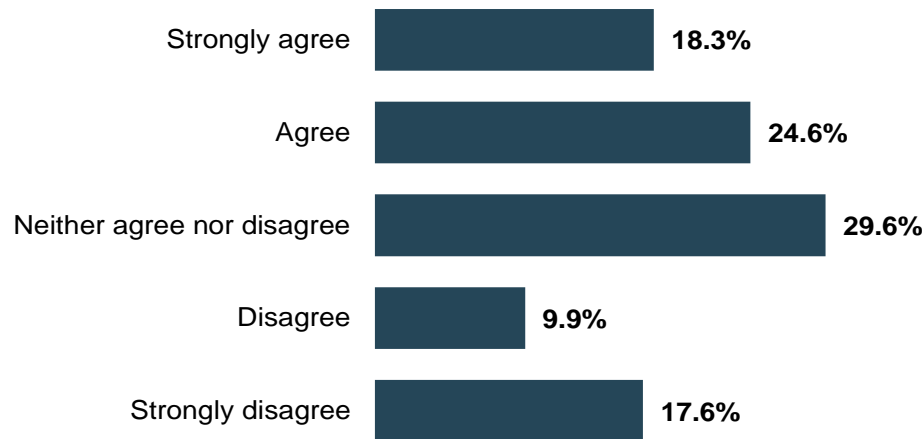
- Three comments questioned the legality of introducing such a system, raising concerns that the Council would be walking away from its duties as a local authority if it failed to provide transport to some young people because the points based system has failed them. *“If a student has the mental capacity to use public transport then this system is good. But if not it is the Council’s duty to provide transport for any young person with special needs to be able to access further education”*.

5.2.11 Other miscellaneous comments

- Nine general comments were made about this proposal, many stating how difficult it is for parents and carers as it is without potentially having a new system to navigate or at worst having something taken away from them that currently supports them and their family in their everyday life. *“I feel that everything is a battle, as a parent I have to fight for my children to get diagnosed, get EHCP plans, get DLA, etc. The form filling and appointments are so time consuming”.*

5.2.1 Respondents were also asked to give their view on the possible expansion of Independent Travel Training Initiative (ITT). 43% of respondents agreed the Council should expand the initiative with over a quarter (27.5%) in disagreement. Almost a third (29.6%) responded neutrally, neither agreeing nor disagreeing with the proposal [Chart 4].

Chart 4: Extent to which respondents agreed or disagreed with the potential expansion of Independent Travel Training Initiative (ITT).



Base: 142 respondents

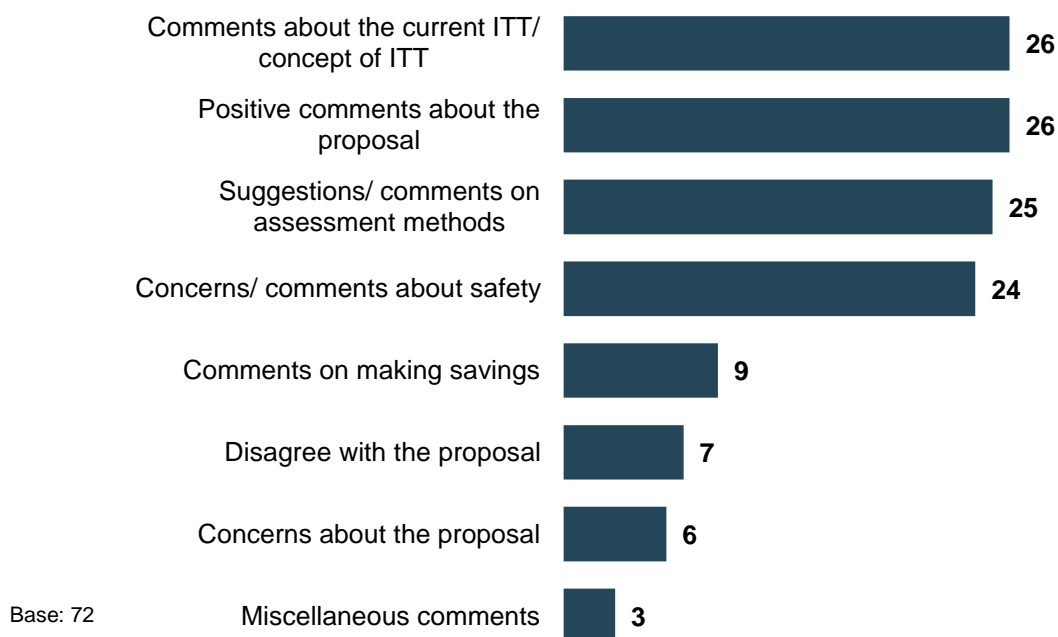
5.3.2 When given the opportunity to comment further on the possible expansion of the ITT Initiative 72³ respondents gave their views. The themes emerging are broadly defined in Chart 5 over the page. The broad themes included comments about the existing scheme (26), positive feedback about the proposal (26), suggestions about assessment methods (25) and concerns about safety (24).

5.3.3 Comments received were overwhelmingly positive about the ethos and purpose of ITT. It seems a large number of respondents agreed with the

³ Many respondents made multiple comments so the total number of themed comments will not add up to 72.

proposals in principal but had concerns or felt there were considerations to be made with regard to process, the mechanics and the detail of the scheme.

Chart 5: Coded comments about the ITT (number made under each broad theme)



respondents (respondents could make multiple comments so numbers will not total 72)

5.3.4 In order to explore this feedback, the comments can be assessed in more detail under each of the broad themes (below).

5.3.5 Comments about the current ITT/ concept of ITT

- Six general comments were made raising concerns about appropriateness and emphasising that independent travel training was not for everyone. On the whole these comments agreed that the concept was a positive one. ***“The independent travel initiative is clearly a significant element of the strategy, aimed at reducing costs and improving independence for students. This latter aim is to be applauded, and in principle I would agree it should be expanded - as appropriate”.***
- Other respondents commented that they wanted or needed more information about ITT, some not having heard of it before.
- Some responded positively about the importance of enabling independence in relation to the proposal, ***“this is a great service and yes it should be expanding”.***
- Five comments were made about the training provider for ITT, highlighting the need for real expertise and experience.
- Some comments were also made about the current system and how it works and also about how often ITT on its own is not always enough. Three comments were made about the need to compliment independent travel with taxis or other methods of travel for some young people. ***“It is really important that you keep the taxi service going as well as expanding independent travel”.***

5.3.6 Positive comments about the proposal

- Of the 26 positive comments made, 11 were statements of agreement with the proposal to expand the ITT. 10 other comments supported the proposal but noted the things that needed to be considered. These mainly referred to not having a universal approach, being flexible, and responding to changing needs. *“I do applaud the idea of the travel training initiative but feel that there could be an albeit unintended pressure to go with something which is not appropriate for some students”.*
- Others talked about the potential benefits of the scheme, and some the positive impact it has already had on their children’s lives. *“My son has accessed [the programme] and can travel on his own to town and back home. It has opened up his world”.*

5.3.7 Suggestions/ comments on assessment methods

- Of the 25 comments that were made about assessment methods, 18 referred to individual capability and the importance of assessing the child or young person independently and understanding the needs of every individual. *“You MUST listen to parents/carers. They know their children or young person best, there will be many for whom this is not suitable”.*
- Three comments were made about issues relating to the lack of public transport on some routes which would make independent travel particularly difficult for some individuals.

5.3.8 Concerns/ comments about safety

- 24 comments were made about safety, many raising concerns about the risks. Eight of these comments referred to respondent’s personal experience with their child and stated that they did not think independent travel would ever be appropriate because of their individual needs.
- Seven comments referred to how vulnerable many children and young people are who would be affected by the expansion of this scheme. *“Most SEN students are very vulnerable, and are not suitable for independent travel training. If anything happened to the student whilst travelling alone, who would take the blame?”* Some also talked about the safety of particular individuals and the need for supervision.

5.3.9 Comments on making savings

- Four of these comments referred to the Council’s financial situation, with respondents believing that the consideration of extending ITT was about

making savings rather than improving outcomes and experiences for SEND young people.

- Some commented that savings could be made if this is implemented properly and does not take a service away from those who most need it.
- Suggestions were made about the use of shared transport to make the required savings.
- Others commented that if personal assistants were needed for independent travel then true savings would not be made.

5.3.10 Disagree with the proposal

- Seven individuals commented that they disagreed with this proposal, some stating that whether a young person uses independent travel or not should be voluntary not a policy decision. ***“I strongly disagree with this it simply would not benefit disabled children and make life more challenging for their parents.”***
- Other disagreed with the policy on a logistical level; that the location of the school made independent travel difficult or that the unreliability of public transport makes it impossible.

5.3.11 Concerns about the proposal

- General concerns were also raised in six comments relating to pushing through a ‘one size fits all’ approach; the adequacy of the training and support available to make this happen; and concerns that no regard will be given to the consultation findings.

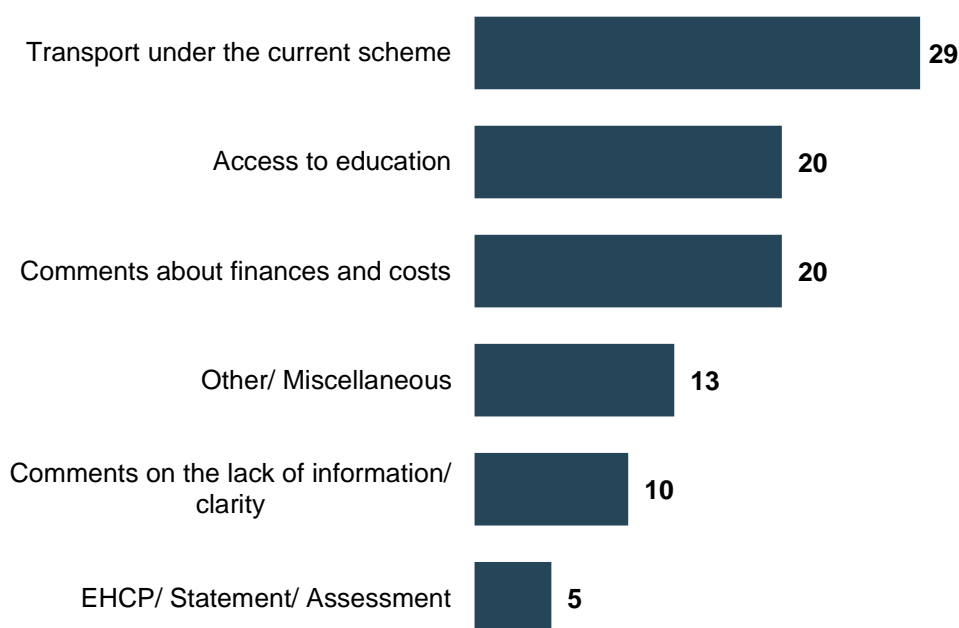
5.3 Home to School Transport Assistance Policy

5.3.1 The consultation described a number of proposed changes that the Council are considering to the Home to School Transport Assistance Policy. These include:

- updated information in relation to Council departments addresses and contact details;
- revised information regarding officer reviews to include reviews for children and youngpeople with special educational needs and/or disabilities to reflect current practice and department for education guidance;
- clarification on the types of suitable school;
- legislative terminology, for example, Criminal Record Bureau (CRB) checks now referred to as Disclosure and Barring Service (DBS);
- the addition of the Council's Independent Travel Training Initiative;
- information regarding appeals, eligibility, how they are processed and considered.

5.3.2 **51⁴** respondents commented on these proposed changes. Key themes emerging from these comments included transport (29); access to education (20) and comments about finances and costs (20) [Chart 6].

Chart 6: Coded comments about the proposed changes to the policy (number made under each broad theme)



Base: 51 respondents (respondents could make multiple comments so numbers will not total 51)

⁴ Many respondents made multiple comments so the total number of themed comments will not add up to 51.

5.3.3 In order to explore these themes, the comments are assessed in more detail under each of the broad headings below.

5.4.4 Transport

- 29 comments were made relating to transport in its various forms from the current provision to the prospect of Home to School Transport being removed. Relating to bus travel, three comments were made concerning cost effectiveness and the benefits of social interaction for the young people ***“I can’t think of a more economical way for her to get to school...most students at the school are on buses that are full, not individual taxis”***.
- Transport contracts was a theme picked up by two respondents, notably in respect of companies meeting their contractual obligations and properly fulfilling the service paid for.
- One respondent raised concerns over the distance required to get her daughter to her prospective college using a mileage restricted Motability vehicle.
- In terms of taxi provision, one respondent cited that for some young people, using a taxi gave them a sense of independence from their parents or carers. A suggestion made by another was for a contribution to be made by parents/carers towards the costs.
- By far the largest number of comments formed the category ‘other’ with 12 comments. Many raised concerns over the removal of home to school transport, ***“removing the transport for these children could leave them isolated and even more vulnerable than they already are; to general comments such as “children with learning disabilities are not going to get better and therefore their needs of support remain unchanged”***.
- Within the ITT sub-theme, half of the eight comments given were from parents/carers discussing the complex needs of the young person in their care and how independent travel training would not be suitable. Those that were supportive of the initiative made mention of the need to ensure safety and involvement of schools. ***“There should be more trainers to help our young people to become more independent on the buses - schools need to be involved from the age of 11”***

5.4.5 Access to education

- Ten respondents identified ‘choice of school/college’ as worthy of consideration, some reported that the choice of educational establishment was not theirs but determined by the needs of the young person. ***“The college in Derby would not allow my son to attend because his disabilities are too profound. It must be noted that Derby College does not have places for students with more complex disabilities”***.

- An equal number of respondents (10) cited that the withdrawal of Home to School Transport provision would reduce or stop school/college attendance.

5.4.6 Comments about finances/ costs

- Eight comments were made relating to savings Derby City Council needed to make, with contrasting tone.
- Some respondents appreciated that savings were needed and made suggestions as to how this might be accomplished, ***“To save money my son does not need a chaperone every day in the taxi. They do not interact or speak he doesn't kick off in the taxi...so I can't see why we need them anyway waste of money!!”***
- Others asserted that the current provision was more cost beneficial to the Council.
- Some discussed the financial/cost impact to families that would likely come from any withdrawal of provision. Comments ranged from the affordability of taxis to fuel costs resulting from the location of the school/college and concern that some young people would be forced out of education due to the financial impact on families.
“it will also mean that a lot of these children may become even more disadvantaged than ever if parents can't afford to fund or feel their child is too vulnerable to allow their child to travel alone or are not able due to other child/ work commitments accompany the child to & from their post 16 education these parents already are far more stretched than the parents of children without special needs”.

5.4.7 Comments on the lack of information/ clarity

- Three sub-themes were evident: clarity is required about the proposed policy; more information is needed particularly on the appeals and eligibility criteria and concern about the consultation.
- Three respondents felt that there was insufficiently detailed information to provide informed feedback on the proposals; coupled with this, respondents cited that they ***“Couldn't see the information on appeals or eligibility and how they are processed and considered.”***
- One respondent wanted to make it known that continued dialogue regarding the proposals was necessary, ***“I just hope now there is this unease as to what is happening the parents and carers are kept up to date at all times”.***

5.4.8 Education Health and Care Plan(EHCP) - Statements/ Assessments

- Five comments were made relating to EHCP, Statement of SEN and the point based assessment system. Most felt that evidence from doctors/medical

professionals should be sufficient to determine access to Home to School Transport provision.

5.4.9 Other/ miscellaneous

- Four general comments were recorded relating to stress on families looking after children/young people with disabilities and the reliance on Home to School Transport to support them. *“Parents of children with disabilities have enough issues to contend with, without the additional worry of the safety of their child on the way to & from school each day it will also mean that a lot of these children may become even more disadvantaged than ever”.*
- Others provided suggestions on how the policy could be phased in *“I would suggest that any changes to transport services be phased in gradually, allowing children attending special schools outside the city to complete their education without disruption”*; or how money could be saved, *“I think that if a family can afford to contribute towards the cost of transport then that should be considered too.”*
- One respondent suggested that policies be easy to read for the benefit of parents/carers. *“Clear and concise information making criteria easier to understand I think would make an easier application process for the parents and for you there at the council”*

5.5 Other emails, letters and submissions

5.5.1 Some respondents chose not to complete the survey but instead submitted their comments and concerns via letter or email. A summary of the points made in these comments is set out in this section.

5.5.2 SENTAS (Special Educational Needs Transport Advocacy Service) reviewed the proposed policy document and made a number of comments and suggestions about the content, tone and presentation of the policy and things that should be considered further in its development. These include (although not exclusively):

- Being mindful of the statutory guidance on school travel times.
- Provisions for young people with an EHCP or statement that names a school should they move home (they should still have transport provided to the same school regardless of distance).
- That there is no mention of taxis in terms of types of transport assistance.
- That the appeals procedure from the statutory guidance should be adopted.

5.5.3 The organisation also gave feedback on other proposals in the consultation, key comments included:

- The local authority's duty to provide Home to School Transport and a query on the meaning of 'discretionary' in this context.
 - Ensuring the points based system works on an individual basis.
 - Some factual questions and queries about what reasonable choice means.
 - That ITT should not be 'one size fits all'.
- 5.5.4 Another emailed response also raised a concern that the proposed changes were purely financially motivated. The sender echoed concerns raised in the survey responses around ITT not being appropriate to all students; the case for a points based system not being made; that the highest priority (profoundly and severely disabled young people) should be exempt from these proposals.
- 5.5.5 Another email registered the sender's strong objection to the introduction of a points based system. They stated that the system may lead to the removal of a much needed service for some young disabled people and that the removal of the service would be discriminatory against them.
- 5.5.6 A letter from a carer of a child with autism asserted that it would not be possible for that child to travel independently and was frightened that he would have to if these proposals came to fruition.
- 5.5.7 The Derby City Parent Carer Forum submitted a report in response to the consultation featuring feedback from consultation meetings that had taken place. The report raises a number of concerns about the proposals including many featured in the SENTAS report (summarised above). The report concluded as follows;
- "We believe a points system should not be implemented, we have formed this conclusion from listening to feedback from our membership and speaking to many parent carers throughout the consultation period, therefore as the voice for parent carers, we will not be partaking in the creation of a point based system as we feel this would be against the wishes of our members.***
- We are open to discussion on the way forward and wish to enter further discussions on further options based on best practice drawn from other Local Authorities and our colleagues from the national network of parent carer forums, in the interest of our parent carers, children, young people and their families in Derby City. We recommend that the proposed policy is revisited to ensure that it is statutorily compliant".***

6 Who responded?

6.1 The tables below set out the demographic profile of those that responded to this consultation.

Table 2: Gender

	Number	%
Male	34	25.4
Female	100	74.6

Base: 134 respondents

Table 3: Age

	Number	%
24 and under	8	6.5
25-34	12	9.7
35-44	46	37.1
45-54	39	31.5
55-64	18	14.5
65 and over	1	0.8

Base: 124 respondents

Table 4: Ethnicity

	Number	%
Asian or Asian British - Indian	6	4.5
Asian or Asian British - Pakistani	10	7.5
Asian or Asian British - Chinese	1	0.7
Black or Black British - African	2	1.5
Black or Black British - Caribbean	3	2.2
Dual Heritage - White and Asian	1	0.7
White - English / Welsh / Scottish / Northern Irish / British	101	75.4
Any other White background	6	4.5
Any other ethnic group	4	3.0

Base: 134 respondents

Table 5: Disability

	Number	%
Yes, consider self to be disabled	18	14.3
No	108	85.7

Base: 126 respondents

Table 6: Sexuality

	Number	%
Heterosexual/straight	98	78.4
Bisexual	2	1.6
Gay man	2	1.6
Gay woman/lesbian	2	1.6
Other	2	1.6
Prefer not to say	19	15.2

Base: 125 respondents

Table 7 and 8: Religion

	Number	%
Yes	45	36.6
No	51	41.5
Prefer not to say	27	22.0

Base: 123 respondents

	Number	%
Christian	38	84.4
Muslim	6	13.3
Prefer not to say	1	2.2

Base: 45 respondents

