

# SEND HOME TO SCHOOL TRANSPORT CONSULTATION ANALYSIS

Author: Nadja Willinger & Sue Robinson

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## **KEY MESSAGES**

## RESPONDENTS

- 147 responses were received to the SEND Home to School Transport section of the consultation survey, 126 responses from the main survey, and 21 from the easy-read version.
- The majority of respondents were aged between 25-years and 59-years. There were just three responses from people who were aged under 25 to both the main and easy read surveys.
- The main ways in which respondents heard about the survey were email from a school or educational setting, an email from Warwickshire County Council or through social media.
- 77.7% of respondents to the main survey and 92.5% of respondents to the easy-read survey were parents or carers.
- Responses were received from people living or working in all districts and boroughs in Warwickshire; overall the highest proportion of respondents lived/worked in/represented Warwick District.
- Just under half (47.6%) of respondents to the main survey and 60% of respondents to the easy-read survey said they or the child/young person they care for currently have travel assistance through SEND Home to School transport.
- The types of assistance used by the highest proportion of respondents to the main survey was minibus with a passenger assistance (31.6%) followed by a shared taxi with a passenger assistant (24.6%).

## **PROPOSED CHANGES TO THE APPLICATION PROCESS**

## Main Survey

- 82.6% respondents either agreed or strongly agreed with the proposed changes to the application process; 8.7% disagreed or strongly disagreed.
- Forthy-seven free-text responses were received as to why respondents answered as they did to the proposed changes to the application process. These focused on benefits of the proposed application process (n=15), voicing concerns or uncertainty about application related- processes (n=5) and questioning the ability of Home to School transport to cater for a potential increase in demand caused by the proposed process (n=1). Some comments weren't directly related to the proposed application process but related to personal experiences with Home to School transport assistance (n=9), criticism of eligibility criteria for Home to School transport (n=7), lack of clarity of Home to School transport procedures (n=5) and suggestions of additional services (n=3).

## Easy-read Survey

• 76.2% of respondents agreed with the proposed changes to the application process, the remaining 23.8% were unsure.

 Seven free-text responses were received as to why respondents answered as they did. Three respondents voiced their agreement with the proposed changes, and two respondents said they were unclear about the changes. Other topics included the need for timely communication and provision of the outcome of the transport application and the type of transport provided (n=2); criticism of limiting transport for students living a certain distance from schools (n=1); highlighting equality concerns, and the absence of translation services for non-English speaking families (n=1); and criticism of the travel money that is being paid (n=1).

## NEEDS ASSESSMENT MATRIX (NAM) PROPOSAL

## Main survey

- 69.8% of respondents agreed or strongly agreed with using the Need Assessment Matrix (NAM) to identify travel options for children and young persons; 14.3% of respondents disagreed or strongly disagreed.
- 44 respondents provided a free-text response on their response regarding the NAM. Comments that were directly related to the NAM most commonly addressed the need for the NAM to include or consider more information than proposed. Further comments criticised the NAM by generally highlighting that the tool is too limited. However, there was also agreement for the NAM with some respondents stating that if modified, the NAM could be a good tool to use.
- Respondents emphasized the need for further information or more clarity of processes within the NAM. This referred to a lack of detail on the individual sections of the NAM; the scoring and allocation of a mode of transport on the basis of the score; the qualifications of staff undertaking the assessment; and the sources of information that are used to complete the NAM. Other respondents drew attention to the individual needs of every child, and the importance of acknowledging these when determining the options for transport.
- Comments also related to a review of transport needs over time, with some respondents supporting the notion of annual reviews of transport needs or the need to cater for amendments, while others were critical of having to re-apply annually. The importance of timely assessments was also raised.

## Easy-read survey

- 61.9% of respondents agreed that 'Is it a good idea to use the new tool'
- Ten respondents provided more context on their rating through a comment. These
  comments addressed the respondents' agreement to the new tool (NAM) and suggestions
  to include more information, such as cultural needs, safety concerns, and views from
  parents. In other comments, emphasis was made on individual needs of children and young
  people. Two respondents were critical of the NAM, and one respondent each addressed

the need for a clear appeals process, and equality concerns and the danger of missing individual needs of each child.

## UPDATES TO THE SEND HOME TO SCHOOL TRANSPORT POLICY

#### Main Survey

- In response to 'Is the clarification of the policy easy to follow and understand', 56.8% respondents indicated that they found it very easy or easy, while 11.9% respondents found it very difficult or difficult, and 30.2% found the clarifications neither easy or difficult.
- Responses about the proposed updates to the SEND Home to School transport policy were provided by 15 respondents. Comments directly addressing themes around the understandability of the proposed changes included referring to the potential difficulties particular groups of people might have understanding the policy. Alternative wording and clarity on the wording was suggested by some respondents, on the behaviour and direct payment amendments.
- Comments that were not addressing understandability of the policy but the amendments that were being made to the policy mainly focused on 1) the proposed wording on damage that occurs to a transport operator's vehicle as a result of actions of a child or young person, these particularly requested clarity on the term 'malicious act' and 2) the allocation of passenger assistants for children and young people of compulsory school age with SEND

## Easy-read survey

- Three-quarters of respondents agree that it is a good thing to make the policy clearer about the areas we have described
- Four comments providing context to this question were received. These highlighted that not enough information was provided to explain how SEND transport is ensuring that needs of all children in need are supported, and the need for qualified and skilled staff acting as transport assistants. One respondent criticised the survey design, while another explained their previous transport experiences, and provided suggestions on how they would like to be supported.

## **FURTHER COMMENTS**

#### Main Survey

Respondents were asked to share comments on whether anything was missed in the proposals, particularly about the impact on certain groups of children and families. This question was completed by 31 respondents.

- Most respondents commented on aspects of the update to the SEND Home to School Transport Policy with the focus being on the section on behaviour and damages to vehicles, and transport assistance. Other respondents highlighted the impact of Home to School transport on children and young people particularly on participation in extra-curricular activities.
- Respondents commented on the need for transport to be flexible. This again referred to the need to provide transport for extra-curricular activities, pick-up and drop-off locations; and flexibility to react to changes to timetables. In line with this, respondents also commented on the impact of transport on parents, carers, guardians and families including the lack of consideration for the needs of parents with disabilities.
- Some respondents suggested additional or alternative services to be considered. This
  included signposting of parents and carers to available support for SEND children and
  young people; the need for revisions of all aspects of transport not limited to schools; the
  provision of travel training independent of SEND transport, criticism of providing travel
  payments to parents and the impact on the environment and public funds, the need for
  collaboration between stakeholders; a formalised service agreement provided by transport
  providers, and a meeting between children and transport staff prior to transport taking
  place.
- Some respondents referred specifically to the NAM. This included the lack of consideration
  of social, emotional and mental health in the assessment, the need to consider each child
  as an individual; the risk of missing hidden disabilities; and the collaboration with other
  stakeholders to identify any impact on children and young people.
- The application process was also commented on further, particularly the eligibility criteria.

A second question completing the SEND Home to School aspect of the survey gathered any other feedback that respondents wanted to share; this was completed by 21 respondents.

- Respondents again commented on the SEND Home to School transport policy with further thoughts on passenger assistants highlighting concerns for the safety of children; and the safety of the vehicle driver.
- The policy section outlining procedures for children or young people damaging transport vehicles was also commented on again. Respondents criticised the wording of this change to the policy, and again called for a definition of a 'malicious act'. Another respondent pointed out a lack of guidance on how damages to the transport staff's possessions would be handled, while the transparency of assessments of the damage was mentioned in another comment.
- There were further comments on the NAM. Of these, three were critical about using this assessment tool, which was explained by stating that children are too different and

individual needs should be considered, and one respondent raised the potentially discriminating effect of the NAM.

 Further comments related to the application process including the need for applications to be considered independent of transport costs and stated concerns that by merging school place and transport applications, the information exchange between parents and WCC is limited.

## Easy-read survey

Six respondents to the easy-read survey had further comments to share. These comments
addressed the need for more flexibility for drop-off locations to accommodate for parents'
working patterns; a concern of providing bus passes as the primary choice of home to
school transport; emphasis on the need to provide information on transport opportunities
to children with SEND; and concerns of the accessibility of the survey for different
communities (n=1). Changes to the SEND home to school transport to improve the service
for transport teams and families were supported; and there was praise of the home to
school transport and helpful transport staff.

## BACKGROUND

Warwickshire County Council (WCC) is working to provide children and young people with Special Educational Needs and Disabilities (SEND) the best service experience they can. As part of the wider consideration of service, changes to the SEND & Inclusion Service Offer and SEND Home to School Transport were proposed and consulted on.

The consultation responses analysed in this report focus on the proposed changes to the SEND Home to School Transport Service. The proposed changes to the home to school transport include:

- Changes specifically relating to the way that parents/carers apply for home to school transport.
- The way that transport options are identified for eligible children and young people.
- Clarifications to the Home to School and College Transport Policy.

Feedback was gathered to hear all views including levels of support or opposition, how the proposals might impact people, and suggestions on how to improve the proposals. This will then inform the future application and assessment process for home to school transport for children and young people with SEND in Warwickshire, and clarifications to the Home to School and College Transport Policy.

## **METHODS**

## **CONSULTATION METHODS**

An online survey was developed and hosted on the Citizen Space 'Ask Warwickshire' webpage (<u>https://ask.warwickshire.gov.uk/</u>) to gather the views of a range of stakeholders (including staff of educational institutions, parents/carers, young people, organisations, and the general public) on the SEND Home to School Transport proposals.

The survey was live between the 5<sup>th</sup> December 2022 and the 12<sup>th</sup> March 2023. Respondents could choose between an online or paper-based survey. Paper surveys were distributed via Warwickshire libraries and were also available on request. In addition, an easy-read version of the survey was launched simultaneously. This could be completed online or in paper format.

Feedback for both the consultations on the SEND Service Offer and SEND Home to School transport were collected in the same survey, but feedback has been evaluated separately.

In addition to the online / paper survey a number of discussion sessions were delivered in schools to understand the views of children and young people and online discussion sessions were also offered to targeted groups. These have been analysed in a separate report.

## **PROMOTION OF CONSULTATION ACTIVITY**

The survey was promoted by using several different channels including direct emails, email and information sent to key partners, internal and external newsletters, and social media. This included information sent directly to:

- Parents and carers currently in receipt of SEN transport
- Warwickshire Parent Carer Voice, SENDIAS and SEND Crisis
- Transport providers
- Schools, including primary, secondary, and special schools
- Alternative Provision settings
- Early Years Settings
- Post-16 Settings
- FE College SEND leads
- Primary and Secondary SENCos
- Standing Advisory Council on Religious Education (SACRE),
- Warwickshire Pride
- Equip
- Integrated Care Board
- District and Borough Councils
- Act for Autism
- Ups of Downs
- Coventry Association for the Deaf
- Royal Association for the Deaf
- Royal Society for Blind Children
- SENSE
- Warwickshire Vision Support
- Consultation and engagement alert subscriber list

Information on the consultation was also provided to libraries and Warm Hubs, and employees of Warwickshire County Council through internal communication channels, to raise awareness. Organisations and staff working with seldom heard groups were made aware of the survey and asked to encourage and support people to respond as part of their ongoing contact and work.

A number of information events were hosted as drop-in sessions in multiple locations across Warwickshire or live broadcasts. A recording of a presentation detailing the proposed changes was made available online and signposted accordingly.

## ANALYSIS

Prior to analysis, one survey response was recoded from organisational to individual response due to user error. Numeric survey data has been aggregated with frequency counts provided in tables or charts throughout the report. Open-ended text survey responses have been coded and grouped into categories by theme. NVIVO software was used to organise and analyse these responses, and all coding was checked by a second analyst.

Where quotes are provided in the report, these were reprinted verbatim, following the correction of spelling mistakes.

## **SURVEY RESULTS**

A total of 147 responses were received to the SEND Home to School Transport section of the consultation surveys, 126 responses from the main survey, and 21 from the easy-read version.

## EQUALITIES MONITORING (MAIN SURVEY)

Table 1 summarises the responses from the equalities monitoring questions for the main survey. For a consultation that focuses on SEND Home to School transport respondents wouldn't be expected to be representative of the general population of Warwickshire. These results show that there was only one response from a respondent aged 24 and under, a group who are users of SEND Home to School transport.

Table 1: Equality data relating to respondents of the full survey.

CATEGORY		SURVEY RES	PONDENTS
		N	%
AGE	Under 18	0	0
	18-24	1	0.8
	25-39	34	27.0
	40-49	43	34.1
	50-59	24	19.1
	60-64	7	5.6
	65-74	2	1.6
	75+	2	1.6
	Prefer not to say	12	9.5
	Not answered	1	0.8
ETHNICITY	Arab	0	0
	Asian or Asian British - Bangladeshi	0	0
	Asian or Asian British - Indian	2	1.6
	Asian or Asian British - Pakistani	1	0.8
	Chinese	0	0
	Other Asian Background	0	0
	Black or Black British - African	3	2.4
	Black or Black British - Caribbean	2	1.6
	Other Black background	0	0
	Mixed - Asian and White	0	0
	Mixed – Black African and White	0	0
	Mixed – Black Caribbean and White	0	0
	Other Mixed Background	3	2.4
	White British	91	72.2
	White Irish	2	1.6
	Gypsy or Traveller	2	1.6

	Other White background	3	2.4
	Prefer not to say	15	11.9
	Prefer to self-describe	0	0
	Not Answered	2	1.6
GENDER IDENTITY	Female (including trans female)	100	79.4
	Male (including trans male)	12	9.5
	Non-binary / agender / gender-fluid	0	0
	Prefer not to say	13	10.3
	Prefer to self-describe	0	0
	Not Answered	1	0.8
IDENTIFY AS	Yes	2	1.6
TRANSGENDER	No	109	86.5
	Prefer not to say	13	10.3
	Not answered	2	1.6
SEXUAL ORIENTATION	Asexual	3	2.4
	Bi / bisexual	0	0
	Gay man	0	0
	Gay woman / lesbian	0	0
	Heterosexual / straight	97	77.0
	Pansexual	4	3.2
	Other	1	0.8
	Prefer not to say	16	12.7
	Not Answered	5	4.0
RELIGION/BELIEF	Buddhism	0	0
	Christianity	55	43.7
	Hinduism	2	1.6
	Islam	2	1.6
	Judaism	1	0.8
	Sikhism	0	0
	Spiritualism	1	0.8
	Any other religion or belief	1	0.8
	No religion or belief	43	34.1
	Prefer not to say	16	12.7
	Not Answered	5	4.0
LONG STANDING ILLNESS	Yes	23	18.3
OR DISABILITY	No	87	69.1
	Prefer not to say	12	9.5
	Not answered	4	3.2

## EQUALITY ANALYSIS (EASY-READ SURVEY)

Table 2 summarises the responses from the equalities monitoring questions for the easy-read survey. Similarly, there were just 2 responses from people aged 24 and under. The majority of responses were from those aged between 25-49.

Table 2: Equality data relating to respondents of the easy-read survey.

Table 2: Equality data relating to respondents of the easy-read survey. CATEGORY		SURVEY RES	SPONDENTS
		Ν	%
AGE	Under 18	2	9.5
	18-24	0	0
	25-39	8	38.1
	40-49	7	33.3
	50-59	2	9.5
	60-64	0	0
	65-74	0	0
	75+	0	0
	Prefer not to say	2	9.5
	Not answered	0	0
ETHNICITY	Arab	0	0
	Asian or Asian British - Bangladeshi	0	0
	Asian or Asian British - Indian	0	0
	Asian or Asian British - Pakistani	1	4.8
	Chinese	0	0
	Other Asian Background	0	0
	Black or Black British - African	0	0
	Black or Black British - Caribbean	0	0
	Other Black background	0	0
	Mixed - Asian and White	1	4.8
	Mixed – Black African and White	0	0
	Mixed – Black Caribbean and White	0	0
	Other Mixed Background	0	0
	White British	12	57.1
	White Irish	0	0
	Gypsy or Traveller	3	14.3
	Other White background	0	0
	Rather not say	3	14.3
	Prefer to self-describe	0	0
	Not Answered (Showmen)	1	4.8
GENDER IDENTITY	A girl/woman	15	71.4
	A boy/man	3	14.3
	Other	0	0
	Rather not say	3	14.3
	Not Answered	0	0
SEXUALITY	Asexual	0	0
	Bisexual	1	4.8
	Gay or Lesbian	0	0
	Heterosexual or straight	12	57.1
	Other Dether not your	0	0
	Rather not say Not Answered	3	14.3 23.8
RELIGION/BELIEF	Buddhism	5 0	23.8
RELIGION/BELIEF	Duuunism	0	0

	Christianity	7	33.3
	Hinduism	0	0
	Islam	1	4.8
	Judaism	0	0
	Sikhism	0	0
	Spiritualism	0	0
	Any other religion or belief (CoE)	1	4.8
	No religion or belief	7	33.3
	Rather not say	4	19.0
	Not Answered (Catholic)	1	4.8
DISABILITY	Yes	2	9.5
	No	16	76.2
	Rather not say	3	14.3
	Not answered	0	0

## SUMMARY OF RESPONDENT CHARACTERISTICS

## **MAIN SURVEY**

The main survey started with questions to understand **where respondents had heard about the survey**. All 126 respondents answered this question. The main channels were an email from a school or educational setting (n=54, 35.3%) and an email from Warwickshire County Council (n=33, 21.6%). A summary of the frequency of each channel is provided in Figure 1.

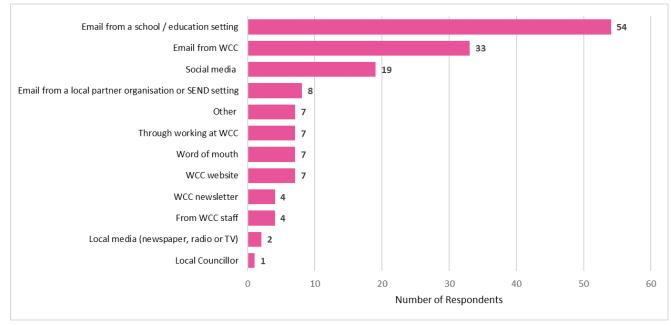


Figure 1: Number of respondents by how they have heard about the survey.

Other channels included that awareness was raised during a drop-in session (n=1), through the Family Information Service (n=1), having asked (n=1), a local library (n=1), the Warwickshire Parent and Carer Voice (n=1), and two respondents stated that they saw a post on the 'Next Door' Social media website.

Respondents were then asked about their **reason for completing the survey**; this was answered by all 126 respondents. The majority of respondents (n=98; 77.7%) described themselves as parents or carers (Figure 2). The nine education staff or providers (7.1%) included three Early Years staff or providers or childminders; two primary school staff or providers, two secondary school staff or providers, one college or further education staff or provider, and one special school staff or provider. Of the three (2.4%) respondents choosing 'other', one described their reason as being a grandparent of a child with SEND in another area; while for two respondents the reason was unclear, one provided no explanation, and the other provided an answer unrelated to the question.

Of the five respondents stating they were other specialist staff (4.1%), the job role or specialist area was described as:

- Ethnic Minority and Traveller Achievement Service GRT
- Inclusion mentor Flex Learning
- Supported Lodgings/ former SEND senior teacher
- Children With Disabilities Social Worker
- Social worker

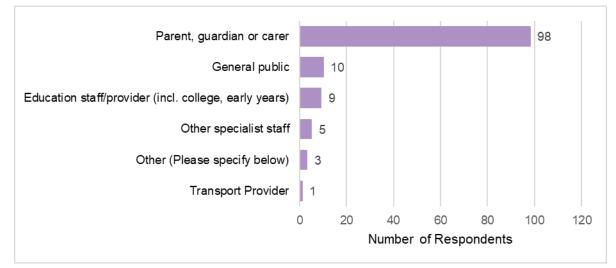
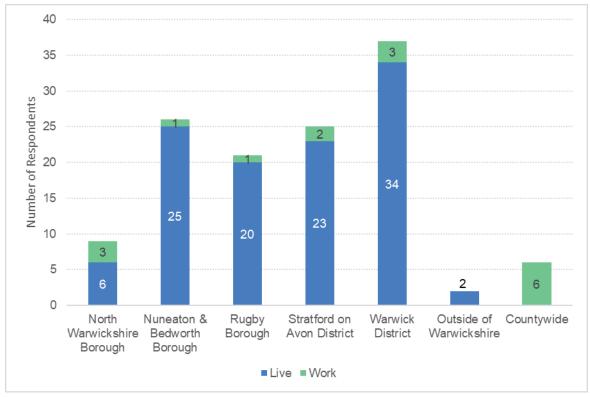


Figure 2: Number of respondents by their reason for completing the survey.

Depending on the respondents' reason for completing the survey, respondents stating to be members of the general public; parents/ guardians or carers; or pupils/students were asked **where they live** (n=110, 87.3%), while all remaining staff members, providers, (elected members) were asked **the area they work/represent** (n=16, 12.7%). A slightly higher number of respondents lived or worked in Warwick District (n=37; 29.4%), followed by respondents from Nuneaton and Bedworth Borough (n=26, 20.6%), Stratford on Avon District (n=25, 19.8%), and Rugby Borough (n=21, 16.7%) (Figure 3). Two respondents (1.6%) stated to be living outside of Warwickshire, and six (4.8%) were working countrywide.

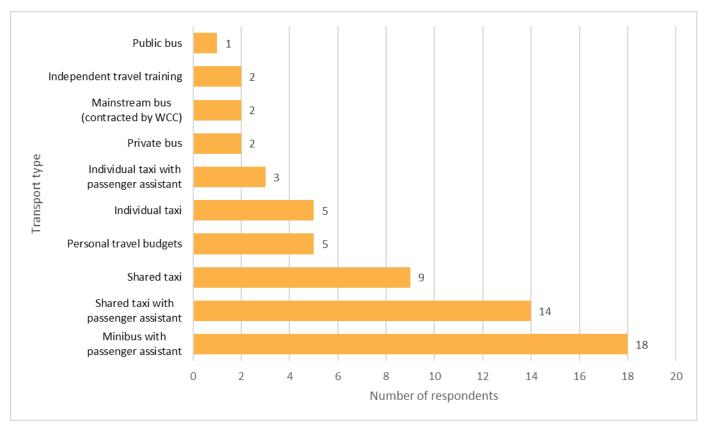


*Figure 3: Number of respondents living or working in each district or borough of Warwickshire.* Excluding two respondents living outside of Warwickshire and six working countrywide.

Respondents that chose to self-describe their reason for completing the survey and those affiliated with an organisation, business or educational facility were asked to state whether they were providing their **personal opinion or whether they were representing their organisation or group**. Of the 18 respondents, four reported to be completing the survey on behalf of an organisation, business or educational facility. These respondents represented:

- Kineton CE Primary School
- Little Stars Christian Preschool
- Warwickshire Parent Carer Voice
- Stratford Childcare Hub

Just under half (n=60, 47.6%) of respondents to the survey said they or the child/young person they care for **currently have travel assistance through SEND Home to School transport**, while two (1.6%) respondents were unsure, one (0.8%) didn't provide an answer, and 63 (50.0%) answered they did not have travel assistance. Types of assistance varied between the 60 respondents using the service, with the most frequent type being a minibus with passenger assistant (n=18, 31.6%), followed by a shared taxi with a passenger assistant (n=14; 24.6%) (Figure 4). Three respondents were unsure (data not shown in graph).



*Figure 4: Type of SEND Transport that is currently used.* Excluding three respondents that were not sure about the type of transport their child is using.

The 60 respondents were also asked which year groups they or the child or young person who receives travel assistance are in. Table 3 shows that over two-thirds of respondents (68.9%) selected an age group in secondary school phase or older.

Age group	No. of responses
Age 19+	1
Year 13 (age 17 to 18)	5
Year 12 (age 16 to 17)	6
Year 11 (age 15 to 16)	9
Year 10 (age 14 to 15)	7
Year 9 (age 13 to 14)	5
Year 8 (age 12 to 13)	5
Year 7 (age 11 to 12)	4
Year 6 (age 10 to 11)	1
Year 5 (age 9 to 10)	3
Year 4 (age 8 to 9)	2
Year 3 (age 7 to 8)	4
Year 2 (age 6 to 7)	3
Year 1 (age 5 to 6)	5
Reception (age 4 to 5)	1

Table 3: Age groups of children/young people receiving travel assistance.

## EASY-READ SURVEY

Of the 21 respondents that completed the easy-read survey on the SEND Home to school offer, most respondents heard about the easy-read survey through social media (n=8; 38.1%) and/or through information from a school / education setting (n=7; 33.3%). Other channels included Warwickshire County Council staff or local councillors (n=5, 23.8%), and two (9.5%) respondents each heard about the survey from Warwickshire County Council website or newsletter, from a local partner or SEND setting, and other channels (specified as an email and through asking members of the community and local neighbourhood watch).

All but one respondent identified themselves as a parent or carer (n=20, 95.2%). The remaining answer was collected from an individual 'supporting a family whose first language is not English'. To provide further context, respondents were provided four additional statements which they could select any that applied (I am 18 years pr younger; I am an adult with SEND; I am a parent or carer of someone with additional needs or disability; I am a parent or carer of a child or young person who does not have additional needs or disability). The majority of respondents described themselves as a parent or carer of someone with additional needs or a disability (n=20; 95.2%) (Table 4).

		Described themselves as		
		Adult with SEND	with someone with young person who does n	
Identified	Parent or carer	1	19	3
themselves as	Someone else	0	1	0

Table 4: Number of respondents by how they identified and described themselves.

The majority of respondents were parents/carers of children in the 5 to 16 years old age group (n=19; 90.5%), with three respondents selecting the 17-25 years age group(14.3%).

Respondents live in all five of Warwickshire's boroughs or districts, with a similar number of respondents living in each area, except from Stratford-on-Avon District with two respondents (Figure 5).

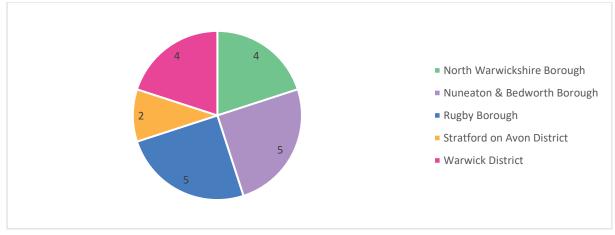


Figure 5: Number of respondents to the easy-read survey living or working in each district or borough of Warwickshire.

Just over 60% of respondents (n=13, 61.9%) described themselves as currently having help travelling between their home and school/college. One respondent that isn't using the home to school transport reported to be transporting their child themselves.

## **PROPOSED CHANGES TO THE APPLICATION PROCESS**

Currently, if a parent/carer would like their child to be considered for SEND home to school transport they must submit an application form, which is usually submitted only when the child or young person's school place has been confirmed.

The proposed change to the application process would remove the need for parents/carers to make a separate application for transport. Instead, they would be asked to make an expression of interest for home to school transport at the same time as applying for their child's school place. This is summarised in Appendix A.

## **MAIN SURVEY**

When asked to rate their agreement to the proposed change to the application process, of the 126 respondents, 54 (42.9%) agreed and 50 (39.7%) strongly agreed to the proposed changes (Figure 6); 11 respondents (8.7%) disagreed or strongly disagreed.

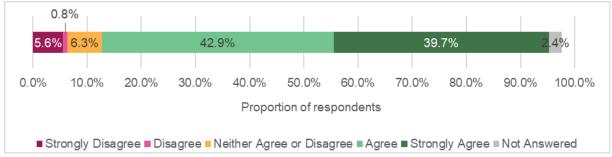


Figure 6: Proportion of respondents by their rating of the agreement to the proposed changes to the SEND Transport application.

Looking at levels of agreement by type of stakeholder, didn't show any significant differences between subgroups. Within every subgroup, only between one and six respondents disagreed or strongly disagreed with the proposal (Table 5).

Stakeholder	Strongly Disagree or Disagree	Neither agree nor disagree	Strongly Agree or Agree	Not answered
Parent, guardian or carer	6 (6.1%)	6 (6.1%)	84 (85.7%)	2 (2.0%)
General Public	2 (20.0%)	1 (10.0%)	6 (60.0%)	1 (10.0%)
Education staff/ provider	2 (22.2%)	0	7 (77.8%)	0
Other specialist staff	1 (20.0%)	1 (20.0%)	3 (60.0%)	0
Transport provider	0	0	1 (100%)	0
Other	0	0	3 (100%)	0

Table 5: Number of respondents by their reason for completing the survey and their rating of the agreement to the proposed changes to the SEND Transport application.

Approximately one third of respondents (n=47; 37.3%) provided **context for the rating through a comment**. Comments were divided into two overarching categories: responses relating to the application process, and general comments. **Application-related comments** were mainly relating to **benefits of the proposed new application process (n=15)**. This was expressed as per the following examples:

"Anything that can streamline the services is beneficial" (ID127, Parent, guardian or carer, Agree)

"Totally makes sense for transport to be contacted as soon as school/college place has been offered and I would appreciate this, especially not having to make a separate application" (ID181, Parent, guardian or carer, Strongly agree)

"The listed potential outcomes justify such action." (ID208, Other reason for completing, Agree)

"Any way to simplify the procedure and lessen the stress on already overwhelmed parents/guardians is a positive move." (ID222 Parent, guardian or carer, Strongly agree)

"Easier process for parents if service is required. Seems less paperwork needed for the same end results." (ID99, Parent, guardian or carer, Agree)

Another theme related to **respondents voicing their concerns or uncertainty of application-related processes (n=5)**, which more specifically addressed the lack of clarity of the impact of the changes on families, while another respondent felt that 'travellers were ignored'. Two respondents highlighted that college applications follow different procedures compared to schools and reported to be unclear about the procedures for applying for transport to and from college. Other respondents stated that it would be useful to have more information on the timelines of the applications process (n=1) and raised concerns about the impact of transport applications on the success of school place applications (n=1).

"I agree but I am wondering how this affects a person going to college? It seems very easy just to tick a box when you apply for a school place but when you are applying to several different colleges and are dependent on your GCSE results will this new system work?" (ID 138, Parent, guardian or carer, strongly agree)

"Applying for a place on the old form was not that difficult and in all honesty it would have been better if I was given some idea of timescales at the start of filling the form in because it was quite an anxious time." (ID 138, Parent, guardian or carer, strongly agree)

"In some ways the proposals seem sensible & intended to achieve greater consistency but as the costs of transport has previously been hugely important in school placement decisions, it is hard to see how each decision, placement & transport, would be taken separately. Parents will need to be satisfied that the school placement decision is taken first on the basis of appropriate criteria (not including transport) and that the transport decision is taken second." (ID 10, Parent, guardian or carer, strongly disagree)

One respondent was **critical of the proposed changes** to the application process due to concerns of WCC's capacity to cater for the increase in demand this simplified application process may create:

School transport is extremely expensive and resources finite. I believe this change will mean more families who don't have a pressing need for transport accessing it as it is part of a standard application form, it would be better as is, a separate application, therefore families who really need the resource will apply. The reality is also that school transport as it is in Warwickshire with limited taxis and suitable passenger assistants means this resource must go to those that need it most, not those who tick another box on a standard application form. The resource is not there for the system already in place. (ID262, Education staff/provider, disagree)

Comments not directly related to the proposed process included respondents sharing **personal experiences with Home to School transport (n=9).** These experiences addressed examples of how transport is affecting families (n=6), the impact of transport on children and young people (n=6), unhelpful WCC staff (n=2), unskilled transport staff (n=1), and helpful WCC staff (n=1). Below are examples of comments coded into this category:

"Also the taxi company that my son uses isn't that great it states same person but there always changing support person and taxi driver&car and they are not doing hand over there leaving him to go off on his own at school and home, this is dangerous as he hasn't got great knowledge of danger." (ID90, Parent, guardian or carer, Strongly Agree)

"The current system is unclear and nobody tells you anything about it. My son's QTVI was unsure. The member of staff at WCC I spoke to about it when applying just told me to go on the website. Nobody called me when I applied and my son's taxi wasn't sorted out until the beginning of September." (ID22, Parent, guardian or carer, Agree) "Applying for transport was complicated and stressful. The team bless them are fantastic and without them I wouldn't of been able to get it as it was confusing." (ID90, Parent, guardian or carer, Strongly Agree)

"We often have to support families to make an application as the process is currently very complicated. The deadline for transport applications is often before a place in college is agreed making it an anxious time for young people and their families." (ID177, Other specialist staff, Strongly Agree)

"Late notification of proposed secondary schooling and then waiting for official written confirmation, leaves little time for my son to adjust to the proposed new arrangements for his travel to school, his adjustment to a new school and to the separation of home/mother and twin sibling. He will need to become accustomed to travelling independently albeit it with transport supervision as this is something he is not accustomed to." (ID213, Parent, guardian or carer, Strongly Agree)

Make access to all send children to have the ability for transport to support parents and carers. Currently we are not allowed as apparently live too close (safe to walk as the crow flies) but it's a 40 minute walk along roads and our child has no road safety skills" (ID35, Parent, guardian or carer, Strongly Agree)

"Students simply to not have access to their days/times of study before first and sometimes second week of September. This means they regularly miss first 4 weeks of term... with a young person with SEND, particularly a mainstream setting... all our transition work is wasted and the placements are routinely not successful. It's very sad." (ID66, Other specialist staff, Neither Agree or Disagree)

Respondents further addressed **criticism of eligibility criteria for Home to School transport assistance** (n=7), which most commonly referred to transport only being provided for catchment schools or criticism of exclusion from transport if a family lives too close to a school (n=6). Three respondents were critical of the reliance on EHCPs to determine eligibility, while another respondent stated that generally more information should be included when determining eligibility for Home to School transport.

"There might be reasons that the young person is entitled to transport that is not on the EHCP, e.g. a sibling in another school. How will this be accounted for or will it cause an application to be denied and then the need for families to appeal thus creating further time-consuming tasks?" (ID133, Parent, guardian or carer, Agree)

"Need to change the named school part as it may not have been identified and if then a further away school is chosen then transport may be rejected as not closest but may be the most appropriate for the child further away" (ID84, Parent, guardian or carer, Agree)

"The changes makes sense but also if the school is close its refused and you need to appeal even though they have mobility needs. There needs to be a section that you can explain needs/ ask for concent to look at ehc plans to get better knowledge of a child's needs to limit pressure on appeals teams and parents." (ID90, Parent, guardian or carer, Strongly Agree)

"I haven't selected strongly agree as my son is VI but does not have an EHCP so I am unclear as to how 'Once the school/setting is named in the EHCP a check would be carried out to see if the child or young person is entitled to transport' would work. I could see some pupils falling through the gaps if a EHCP is needed." (ID22, Parent, guardian or carer, Agree)

Other voices were addressing the **lack of clarity of home to school transport procedures** (n=5), which referenced questions regarding the application process for transport when needs are identified during an ongoing school year (n=1); procedures of applying for transport to and from colleges (n=3); and two respondents were unclear about the appeal process.

"Also, what is the appeal process in relation to the transport decision? Who makes the decision and how would parents get this reviewed & by whom?" (ID10, Parent, guardian or carer, Strongly Disagree)

"Provision needs to be put in place to manage those pupils whose SEND needs become apparent at a later stage such that they can no longer use the available school bus" (ID220, Parent, guardian or carer, Strongly agree)

"Personal feedback from many parents is about our systems organising POST 16 transport and the difficulties with knowing their young person's timetable PRIOR to term starting. This includes the mainstream college placements at all Warwickshire Colleges as well as at AP such as Lamp. Students simply to not have access to their days/times of study before first and sometimes second week of September. This means they regularly miss first 4 weeks of term... "(ID66, Other specialist staff, Neither agree or disagree)

Other respondents **suggested of additional services** (n=3), which included preparatory travel training and paid travel for all children and young people, and paid transport for all SEND children; or were voicing their **criticism of existing transport services**, which included travel training and the provision of SEND home to school transport in general, as this was perceived as unfair to children without SEND. One respondent was **critical of all proposed changes** to SEND Home to School transport.

"Do not agree with your proposed changes I'd want to see the needs assessment matrix first The LA are responsible for ensuring send students have transport." (ID259, Parent, guardian or carer, rating strongly disagree)

## EASY-READ SURVEY

All 21 respondents rated their agreement to the proposed changes to the application process. Most respondents agreed with the changes, and while five respondents were unsure, no respondent reported to disagree.

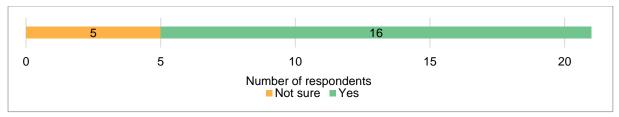


Figure 7: Number of respondents to the easy-read survey by their rating of the agreement to the proposed changes to the SEND Transport application.

Seven respondents provided free-text responses on their agreement rating. Of these, three respondents stated their agreement with the proposed changes, and two respondents stated to be unclear of the changes. Other topics that were addressed were the need for timely communication and provision of the outcome of the transport application and the type of transport provided (n=2); criticism of limiting transport for students living a certain distance from schools (n=1); highlighting equality concerns, and the absence of translation services for non-English speaking families (n=1); and criticism of the travel money that is being paid (n=1).

"To make sure that the Council get in touch with the transport services before school starts back, to make sure parents can tell their child what is going to happen. It would help parents to make sure their child feels safe and secure." (ID3ER, rating 'yes')

"The schools and when completing applications are not ethnic friendly and no translation services available" (ID4ER, rating 'not sure')

"I think this is a very good idea because I can't read or write and this would make it easier and also for families who can't speak English. It would be easier" (ID6ER, rating 'yes')

"Not aware of what the proposed changes are. Other than what is briefly written further up on this page about applying at same time as school place, I do think this is a good idea, however I do also think when applying for a school place-being able to get to a setting plays a significant role in a parents decision when applying for a school. A lot of parents/carers do not have the means to get to a school that may be more suitable for their child so I think they should be made aware of help on offer way before they apply" (ID9ER, rating 'not sure')

"I'm not sure what the changes are." (ID12ER, rating 'not sure')

"I agree help with transport should be requested by filling in a form in the school and then the school would be who does the rest of the process with the council. There are different supports regarding transport, not everything is giving money to the families because the amount they receive doesn't always cover the real issue. Taxis, bus passes, training in a new route (may not be permanent support, only when needed but they don't have to start from scratch each time), staff to do this in every single case, offering it only to town students has no sense. Students in rural areas have the same right to attend school with their needs met as any other student. Moreover, support has to be there from day one, it can't arrive weeks or months later and it has to be reliable." (ID14ER, rating 'not sure')

"I think it will make it easier for parents" (ID15ER, rating 'yes')

## **NEEDS ASSESSMENT MATRIX PROPOSAL**

The Needs Assessment Matrix (NAM) is a tool that has been designed to help identify potential travel options for a child or young person, based on their level of special educational need and/or disability. Views were gathered to understand whether respondents agreed or disagreed with the proposed introduction of this tool – Appendix B.

The tool is designed to identify how we transport a child or young person to their educational setting, not if they will be transported. This means that it will not affect eligibility for transport. There are clear eligibility criteria when deciding if a child or young person will be offered home to school transport – these are set out in the current Home to School Transport Policy.

## MAIN SURVEY

More than two thirds of respondents agreed or strongly agreed with using the Need Assessment Matrix to identify travel options for children and young people; 87 respondents agreeing or strongly agreeing, 18 respondents neither agreeing or disagreeing, and 19 respondents disagreeing or strongly disagreeing (Figure 8).

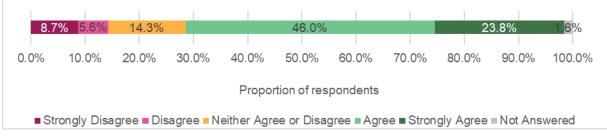


Figure 8: Proportion of respondents by their rating of the agreement to the Needs Assessment Matrix (NAM).

Looking at responses by respondent reasons for completing the survey, agreement ratings were similar (Table 6).

Stakeholder	Strongly Disagree or Disagree	Neither agree nor disagree	Strongly Agree or Agree	Not answered
Parent, guardian or carer	15 (15.3%)	15 (15.3%)	67 (68.4%)	1 (1.0%)
General Public	2 (20.0%)	1 (10.0%)	6 (60.0%)	1 (10.0%)
Education staff/ provider	2 (22.2%)	0	7 (77.8%)	0
Other specialist staff	0	1 (20.0%)	4 (80.0%)	0
Transport provider	0		1 (100%)	0
Other	0	1 (33.3%)	2 (66.7%)	0

Table 6: Number of respondents by their reason for completing the survey and their rating of the agreement to the Needs Assessment Matrix (NAM).

A total of 44 (34.9%) respondents provided a free-text response on their rating. Comments that were directly related to the NAM most commonly addressed the need for the **NAM to** 

include or consider more information than proposed (n=15). Of these, respondents suggested addressing neurodiversity (n=4); including considerations of social, mental and emotional health (n=3); information from other professionals such as social workers or medical staff (n=2); the needs of families (n=2); each child's safety and vulnerability (n=1); travel times and distance travelled (n=1).

"The matrix should be the starting point. There may be other factors which need to be taken into account in each particular case. The person making the transport decision should also be required to liaise with social workers and other professionals involved including schools. Which begs the question, how & where do they get the information from which is needed to apply the matrix?" (ID10 Parent, guardian or carer, Strongly Disagree)

"I think as it is doesn't quite work as [...] 2 - there is no section about distance or the complex nature of public transport from/to a particular location. For example, some of the more remote villages in Warwickshire may not have reliable public bus services or they may not be very often. Also the duration of the journey and whether changes would be needed for longer distances (I.e there isn't a direct public transport route). These would impact whether any child could access independent travel. One CYP may be able to access a short bus journey to school with some support, but not a long complicated journey. Also, I would be worried about how remote some places are and the child travelling alone and getting off the bus alone etc.

3 - as far as I can tell there is no mention of social, emotional and mental health need. This may come under medical and vulnerability but it's not very clear for whoever is assessing. For example a child may have the cognitive ability to access independent travel training but have such high anxiety that they cannot access it at all. I feel like this needs a little more explaining so children aren't being forced into something they cannot achieve.

4 - also family dynamics don't seem to be taken into account. If the CYP got public transport will there be someone at home to receive them at that time? (as this is dictated by the bus timetable). How will the CYP get to the bus stop and again is this possible at the times the buses are there?" (ID 102, Parent, guardian or carer, Neither Agree or Disagree)

"The needs of children with neurodivergent traits will be disproportionately affected and leave them even more disadvantaged." (ID207 Parent, guardian or carer, Strongly Disagree)

"I don't feel there is a wide enough scope of needs in the current or proposed matrix. For example, my daughter is physically fine but would possibly only score under vulnerability and ITT. There needs to be more scope for scoring across a wider range of neurodivergent issues." (ID88, Parent, guardian or carer, Strongly Disagree)

"The NAM does not account for distance. In your example of Juliet the need for transport is primarily because the distance is too great for the parents to travel yet the model makes no allowances for this when assessing the child's ability for it. There will be occasions where the distance means it is not safe for a child to travel alone, even if they would be capable of doing this for a shorter distance. I don't think a model that does not account for this is fit for purpose. I'm not clear on how the model accounts for needs which vary day to day or what weighting it gives to different areas of need." (ID242, Parent, guardian or carer, Disagree)

"The new proposal does not take account of social needs. Our Son is a young carer and as such has care duties that leave him unable to use the school bus service as it leaves too early in the morning. His social needs require that he should get support with alternative school transport but currently he doesn't get this and he still will not qualify under the new proposal. Unfortunately, due to this there are occasions where he is unable to attend school because he simply cannot get there. The school is 5 miles from our home and was not parental choice on the school application. Some days there is just nobody available to take him and also there is the cost implication in the current wider circumstances. You have got to start look outside the box. The proposal is still to narrow minded and none inclusive." (ID277, Parent, guardian or carer, Neither Agree or Disagree)

"The Needs Assessment Matrix appears to be very generalised - what evidence will be used to ensure that the levels of need are correctly identified and will the professionals submitting reports for EHCPs know to provide the information about travel needs." (ID288, Other, Neither Agree or Disagree)

"I agree the transport is based on need of the child however I feel the need of the family needs to be considered" (ID34, Parent, guardian or carer, Agree)

"Need to take into account child safety and vulnerability not just location" (ID35, Parent, guardian or carer, Strongly Agree)

"Look at max travel time." (ID94, Parent, guardian or carer, Not Answered)

Comments further addressed **criticism of the NAM** (n=13). Respondents explained their criticism by generally highlighting that the tool is too limited (n=6). Other comments justifying respondents' criticism included concerns that the scoring implies false accuracy (n=2), or respondents were voicing their disagreement with the transport options for the respective NAM scores (n=2). Some respondents criticised the lack of clarity of the appeals process (n=1); or had concerns about the qualifications of the assessors (n=2), the lack of human judgment (n=3), the lack of a holistic view of transport needs and children (n=2); or stated that the NAM could cause confusion for parents and carers (n=1). Four respondents were concerned that the application of the NAM would result in people 'being scored out of support'.

"The matrix is overly simplistic, if a child has specific need based on one of the criteria (say medical) but the others are not significant (Behaviour, mobility, vulnerability) they would not be rated highly by the process and thereby excluded from services. A human assessment of the individual child and the circumstances and available services in the area would give a better outcome than a tick box exercise". (ID172, Parent, guardian or carer, Strongly Disagree)

"You have got to start look outside the box. The proposal is still too narrow minded and noninclusive." (ID277, Parent, guardian or carer, Neither Agree or Disagree) "This sounds to me like an exercise to reduce the number of children using taxis and minibuses to get to their specialist settings. The number of children who can travel independently will be negligible and your definitions of vulnerable may not match parents' views. One would assume that children and young people who have been assessed as requiring specialist school provision are vulnerable enough to require specialist school transport. A matrix scoring system will surely lead to situations where children don't score enough to receive it. Vehicle shortage and budget cuts have obviously contributed to this new 'matrix' idea" (ID128, Parent, guardian or carer, Disagree)

"The matrix is overly simplistic, if a child has specific need based on one of the criteria (say medical) but the others are not significant (Behaviour, mobility, vulnerability) they would not be rated highly by the process and thereby excluded from services. A human assessment of the individual child and the circumstances and available services in the area would give a better outcome than a tick box exercise." (ID172, Parent, guardian or carer, Strongly Disagree)

"I think the medical section needs a bit more explaining as it comes across as it being just for if medical assistance is/may be required on transport, whereas the fact that ADHD is on there also suggests to me that it is about maybe assistance with paying attention to where they are/where they need to be (where to get off), help with anxiety, knowing and avoiding dangers? And if it isn't about these things then it should be." (ID102, Parent, guardian or carer, Neither Agree or Disagree)

"Who in the risk assessment department is qualified to determine what status a medical need is classed as? Are there staff with extensive medical knowledge to make those decisions? Are there Drs or Nurses available to offer guidance on what level that young persons' medical needs should be scored at? It is hard to believe that all disabilities and needs can be included in a matrix. Will the decision be a computer program-based response? Or will it continue to be the same staff who already make these decisions? I am concerned that using the matrix will reduce the communication between parent/carers and the transport departments thus removing the human elements to the process. Children with additional needs are already isolated in one way or another and parents and carers fight this all the time. Having to fight another step in their lives is not something that is necessary. My interpretation is that the decisions and outcomes will be the same as they currently are so I do not think adding more steps is necessary. Especially when you are trying to make the process simplified. Seems very unnecessary." (ID95, Parent, guardian or carer, Strongly Disagree)

"The use of numbers implies a degree of accuracy that is unachievable in this scenario. The needs of children with neurodivergent traits will be disproportionately affected and leave them even more disadvantaged. This proposal is not about improving the service it's about reducing the skill set of the people administrating the service - they will no longer need too be trained professionals with the ability to use knowledge, expertise and judgement. This is a 'computer says No' scenario that will result in excluding some kids from the service. It's despicable!" (ID207, Parent, guardian or carer, Strongly Disagree) "Public transport not an option for children with ASD" (ID 86, Parent, guardian or carer, Neither Agree or Disagree)

"Need a clear process for how to deal with disagreements between the assessing Team & parents/carers" (ID230, Parent, guardian or carer, Neither Agree or Disagree)

In contrast to the above theme, explicit **agreement to the NAM** was voiced by 13 respondents, with an additional six respondents stating that if modified, the NAM could be a good tool to use.

"I think it is a good approach especially the Independent Travel Training option and Behaviour." (ID163, Parent, guardian or carer, Strongly Agree)

"If it reduces burden on taxpayer it's ok." (ID204, General public, Agree)

"Whilst it is difficult to see any process being perfect, the proposed approach to measure need in a structured manner looks to be an improvement on current practice." (ID208, Other reason, Agree)

"My experience was that the selection criteria was totally opaque. This would give much more clarity." (ID22, Parent, guardian or carer, Strongly Agree)

"The matrix looks like a much better way to assess a child's needs but that's only on the off chance you are accepted and in the catchment school which is hardly ever the best option for a child with SEND!!" (ID4, Parent, guardian or carer, Agree)

"The matrix should be the starting point. There may be other factors which need to be taken into account in each particular case." (ID10, Parent, guardian or carer, Strongly Disagree)

"I think overall the matrix could be a good tool as long as it is used properly with a few extra considerations and clearer explanations of what is required in each section and the right people doing the assessments who actually know the child (not someone who has met them for 5 minutes for example) and that take on board other professionals' opinions." (ID102, Parent, guardian or carer, Neither Agree or Disagree)

"As long as the matrix is not the only factor used. There must be allowances for specific individuals whose needs are not wholly covered in the questionnaire (there will be some). Interested in the idea but the criteria seems open so needs to be more defined" (ID84, Parent, guardian or carer, Neither Agree or Disagree)

"Any access to school transport needs to heavily rely on a universal black and white needs assessment system, not a reported or opinion based one, but yes or no to specific criteria, so those with the greatest need are served first." (ID262, Early years staff / provider or childminder, Strongly Agree) Seven respondents emphasized their **need for further information or more clarity of processes**. This referred to a lack of detail on the individual sections of the NAM; the scoring and allocation of a mode of transport on the base of the score (n=2); the qualifications of staff undertaking the assessment (n=2); and the sources of information that are used to complete the NAM (n=1).

"Numerical scoring helps give an indication and organisations justify their decisions but disregards the whole child - for example, I have a child that can cycle independently but can't use public transport due to social needs, your scoring wouldn't account for that and would likely (if an unsafe cycle route was available) insist on transport training which misses the whole point of his needs" (ID294, Parent, guardian or carer, Disagree)

"The Needs Assessment Matrix appears to be very generalised - what evidence will be used to ensure that the levels of need are correctly identified and will the professionals' submitting reports for EHCPs know to provide the information about travel needs". (ID288, Other reason, Neither Agree or Disagree)

"I think the medical section needs a bit more explaining as it comes across as it being just for if medical assistance is/may be required on transport, whereas the fact that ADHD is on there also suggests to me that it is about maybe assistance with paying attention to where they are/where they need to be (where to get off), help with anxiety, knowing and avoiding dangers? And if it isn't about these things then it should be." (ID 102, Parent, guardian or carer, Neither Agree or Disagree)

"The person making the transport decision should also be required to liaise with social workers and other professionals involved including schools. Which begs the question, how & where do they get the information from which is needed to apply the matrix?" (ID10, Parent, guardian or carer, Strongly Disagree)

"Who in the risk assessment department is qualified to determine what status a medical need is classed as? Are there staff with extensive medical knowledge to make those decisions? Are there Drs or Nurses available to offer guidance on what level that young persons medical needs should be scored at? It is hard to believe that all disabilities and needs can be included in a matrix. Will the decision be a computer program-based response? Or will it continue to be the same staff who already make these decisions?" (ID95, Parent, guardian or carer, Strongly Disagree)

Other respondents drew attention to the **individual needs of every child**, and the importance of acknowledging these when determining the options for transport (n=6).

"Not all children are the same, their needs should be looked at individually not as an umbrella category" (ID11, Parent, guardian or carer, Strongly Agree)

"Different abilities require different things. It's not fair to shelter a child who may be capable if more or vice versa, to provide inadequate or inappropriate support/assistance for a child that requires it for safe and secure transport." (ID 276, Parent, guardian or carer, Agree) Three comments related to a **review of transport needs over time**, with two respondents supporting the notion of annual reviews of transport needs or the need to cater for amendments, while one respondent was critical of having to reapply annually.

"This needs to be flexible and ongoing to highlight any issues further down the line once implementing and provision for any amendments to be made." (ID265, Parent, guardian or carer, Strongly Agree)

"As I mentioned before the needs of the child needs to be known before making a decision, this is great :) also applying every year even though needs won't change ??" (ID90, Parent, guardian or carer, Agree)

One respondent each addressed the **need for timely assessments** and an **alternative suggestion** to consider independent travel training as first instance given to each child.

"Would suggest that these needs are addressed sooner rather than later in consideration of providing transport help." (ID213 Parent, guardian or carer, Strongly Agree)

"travel training is always our first option" (ID66, Other specialist staff, Neither Agree or Disagree)

Comments that were not directly related to the NAM included respondents sharing their experiences with home to school transport (n=3); or criticising WCC staff (n=1) and the transport eligibility criteria (n=1).

"The matrix looks like a much better way to assess a child's needs but that's only on the off chance you are accepted and in the catchment school which is hardly ever the best option for a child with SEND!!" (ID4, Parent, guardian or carer, Agree)

"My daughter was offered a bus to school. This takes an hour in the morning and an hour in the evening. This was far too long for her to be sat on the bus with other students as she struggles with spending a whole day at school after two years of not attending at all, resulting in her trying to run away from school and threatening to kill herself if she was made to get on the bus (dramatic, but difficult to deal with). I have funding to take her myself, but this has meant that my working hours have been dramatically reduced (9-5 into 9.30-2.30)." (ID80, Parent, guardian or carer, Strongly Disagree)

"You need to put the kids first stopping employing useless sw and the useless cwdt" (ID167, Parent, guardian or carer, Strongly Disagree)

Two comments or components of comments were unclear. These are stated below:

"Help kids to get there" (ID168, Other reason, Agree) "Sympathy options." (ID94, Parent, guardian or carer, Not Answered)

## **EASY-READ SURVEY**

All 21 respondents to the easy read-survey, responded to the question 'Is it a good idea to use the new tool'; 61.9% answered 'Yes' (Figure 9).

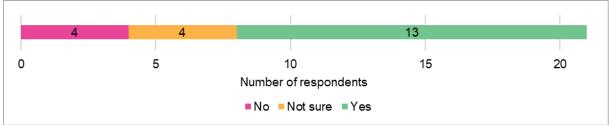


Figure 9: Number of respondents to the easy-read survey by their rating of the agreement to the new tool (NAM).

Ten respondents provided more context on their rating through a comment. These comments addressed the respondents' agreement to the new tool (NAM) (n=4), and suggestions to include more information (n=5), such as cultural needs (n=1), safety concerns (n=2), and views from parents (n=2). In other comments, emphasis was made on individual needs of children and young people (n=3). Two respondents were critical of the NAM, and one respondent each addressed the need for a clear appeals process, and equality concerns and the danger of missing individual needs of each child.

"I think it's a good idea, but make sure it RIGHT transport for that child." (ID3ER, Parent or carer, Yes)

"Yes if parents views are taken into account." (ID20ER, Parent or carer, rating not sure)

"I think this is good as it will give the children the opportunity to be independent and the score will see if they need extra help" (ID15ER Parent or carer, rating yes)

"You have missed out cultural needs" (ID4ER, Parent or carer, rating yes)

"As long as the tool is detailed enough and includes all relevant information to each individual I think this could work although I strongly believe there should be an opportunity for additional information/thoughts on the matter from parents, the child themselves and current education settings and I believe these should strongly be taken into account as usually it is the parent/carer that knows their child best" (ID9ER, Parent or carer, rating not sure)

"My concern is the safety aspect, during winter months dark mornings and dark afternoons this needs to be taken into consideration. There needs to be a right to appeal if families do not agree with transport decisions." (ID5ER, Someone else, rating No)

"Safety in travel alone rather than with provided transport is an important aspect of assessing need." (ID7ER, Parent or carer, rating yes)

"All situations are different and so need to be considered carefully" (ID12ER, Parent or carer, rating not sure)

If this tool works as the PIP points... you are going to say only a couple of children need support. A rigid tool which generalises and doesn't take into consideration each case won't work. Or will probably do for you... as the aim is to reduce the budget, isn't it? (ID14ER, Parent or carer, rating no)

"I think this is disrespectful for children with special needs. Some can't walk and some can't see danger. This can change and doesn't always give a true picture of the child. I'm very disappointed that this tick box system is being considered - I am appalled. This should be done away with." (ID6ER, Parent or carer, rating no)

## UPDATES TO THE SEND HOME TO SCHOOL TRANSPORT POLICY

The Home to School and College Transport Policy (2020) sets out our approach to providing transport to schools/educational settings for children and young people aged 3 to 19 years old (up to 25 years for children and young people with special educational needs and disabilities).

Some additions and further clarification to the current Home to School Transport Policy are proposed (Appendix C). These includes the introduction of new wording and updates to current wording to provide clarification on the following:

- The Council's protocol following any damage that occurs to a transport operator's vehicle as a result of actions of a child or young person.
- Ensuring support for internships include apprenticeships.
- The allocation of passenger assistants for children and young people of compulsory school age with SEND.
- The use of Direct Travel Payments for children and young people of compulsory school age.

## MAIN SURVEY

Respondents were asked 'Is the clarification of the policy easy to follow and understand'. Seventy one (56.8%) respondents indicated that they found it very easy or easy to follow and understand, while 15 (11.9%) respondents found it very difficult or difficult, and 38 (30.2%) found the clarifications neither easy or difficult (Figure 10).

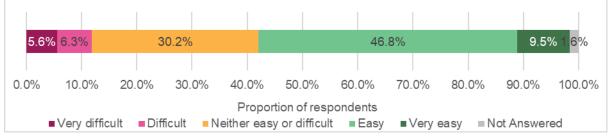


Figure 10: Proportion of respondents by their rating of the understandability of the clarifications to the transport policy.

The above rating is reflected in the rating of individual stakeholders participating in the survey, and no differences were apparent between types of respondents (Table 7).

Stakeholder	Very difficult or Difficult	Neither easy nor difficult	Very easy or Easy	Not answered
Parent, guardian or carer	10 (10.2%)	26 (26.5%)	61 (62.2%)	1 (1.0%)
General Public	1 (10.0%)	3 (30.0%)	5 (50.0%)	1 (10.0%)
Education staff/ provider	2 (22.2%)	4 (44.4%)	3 (33.3%)	0
Other specialist staff	1 (20.0%)	3 (60.0%)	1 (20.0%)	0
Transport provider	0	1 (100%)	0	0
Other	0	1 (33.3%)	2 (66.7%)	0

Table 7 Number of respondents by their reason for completing the survey and their rating of the understandability of the updates to the policy.

Responses about the proposed updates to the SEND Home to School transport policy were provided by 15 (11.9%) respondents. Comments directly addressing themes around the understandability of the proposed changes included referring to the **potential difficulties particular groups of people might have understanding the policy** (n=5). Respondents pointed out that they can't read very well; the policy is wordy (n=1) and includes too much jargon (n=1). General awareness to the needs of different people was raised by one respondent.

"I understand it.. but them I'm a professional! [...] Some of our families of course have their own needs and challenges!" (ID66, Other specialist staff, rating difficult)

"I cannot read very well due to my literacy" (ID 168, Other reason, rating very difficult)

"It's very 'wordy'. Might not be accessible for some." (ID21, Education staff/provide, rating neither easy or difficult)

"I think there is too much jargon on this document. It could quite easily state repair costs will be sought from the child's family if malicious damage has been caused to an operators vehicle." (ID138, Parent, guardian or carer, Difficult)

"I feel that some people will find it difficult to follow. It would be beneficial if it could be simplified to help parents/carers with additional needs themselves to have a clear understanding of how the proposed changes could affect them." (ID277, Parent, guardian or carer, easy)

Alternative wording was suggested by two respondents, which referred to sections on behaviour section.

"Accidental damages, "when reasonable" not in policy" (ID94, Parent, guardian or carer, no rating)

"Specialist risk assessor? Really? What does that mean and who is it? We are all capable of assessing risk but to use words such as this is incorrect. People that assess claims are claims assessors and that's what this boils down to. You will be claiming it back from the childs family." (ID138, Parent, guardian, carer, Difficult)

## One respondent highlighted a lack of detail on the provision of transport/direct travel payments, and the related appeals process.

"More needed on the stages and how they work e.g. if parents travel is the 1st instance how do they ask for more support, will there be hoops to jump through to prove it. Who does the risk assessment and can it be appealed?" (ID84, Parent, guardian or carer, rating difficult)

Comments that were not addressing understandability of the policy but the amendments that were being made to the policy mainly focused on (1) the **proposed wording relating to any damage that occurs to a transport operator's vehicle as a result of actions of a child or young person** (n=5), these particularly requested clarity on the term 'malicious act'.

"So many scenarios to consider. However, I do agree that parents/carers should take some responsibility for malicious damage - how do you decide what is malicious or behavioural due to circumstances though?" (ID82, Other specialist staff, neither easy or difficult)

"You need to define a "malicious act". This needs to be incredibly specific as it relates to children with SEND who could be discriminated against on the basis of such wording. What protections and safeguards are going to be in place to prevent behaviours of distress arising from disability are not castigated as malicious? What considerations were made in your equality impact assessment for this? (ID242, Parent, guardian or carer, Very Difficult)

"In terms of the damage clause, I appreciate it may deter to some degree but how on earth you can determine "malicious damage" from the majority of children that will access this service is unknown to me, I feel it may further add to stress and family worries without any benefit to any party. [...] (ID262, Education staff/provider, very difficult)

"The wording for the transport policy regarding damages needs to be clearer. It doesn't define a malicious/deliberate act and we are concerned that it leaves too much room for interpretation. If a child caused damage the behaviour might be arising from their disability but depending who was reviewing this and their level of understanding it could be deemed "malicious" under the policy. (ID288, Other, Neither easy or difficult)

""Behaviour" The incident investigation process and form needs to be provided as part of this consultation, it is important that this is a sufficiently qualified person who understands the young persons needs, supervision and circumstances of behaviour - damage resulting in poor supervision needs to be recognised. If this is a frequently occurring type of incident then the root cause needs to be found." (ID294, Parent, guardian, carer, Difficult)

(2) the allocation of passenger assistants for children and young people of compulsory school age with SEND (n=4).

"So no escorts are unlikely to be provided but parents would potentially be responsible for damage caused by the child??? Will a driver need to get out of the front seat to help children onto the vehicle safely? Some of these children will be very young & will have learning disabilities & no road sense. How will a driver manage if something happens on the bus? What would happen if something happened to the driver who has a vehicle full of SEND children or an accident occurs? How will safeguarding issues be managed e.g. the driver has only one child in the vehicle (beginning and end of the drop offs)? The LA would surely be liable if something happened"? (ID10, Parent, guardian or carer, rating neither easy or difficult)

"I strongly believe that passenger assistants are needed on all transport due to the nature of the children that are travelling, unless the child is travelling on their own." (ID80, Parent, guardian or carer, rating neither easy or difficult)

"Risk assessment regarding individuals and need for passenger assistant, is vital, really pleased to see this, we are dealing with some of the most vulnerable children and a blanket approach should never have been in place." (ID262, Education staff/provider, very difficult)

"Copies of risk assessments should be provided to parents, that should be made explicit" (ID294, Parent, guardian, carer, Difficult)

One comment provided general criticism of the policy

"Its words, think about the kids get them some help and sack the rubbish you currently employ" (ID167, Parent, guardian or carer, rating very difficult)

Another respondent suggested that the changes to the wording will have a positive impact.

"There are situations where the new wording regarding wraparound provision transport will greatly benefit children with additional needs and add to the possibility of success of their overall day so this is brilliant." (ID262, Education staff/provider, rating very difficult)

## EASY-READ SURVEY

All but one respondent (n=20, 95.3%) to the easy-read survey responded to the question "Do you agree it is a good thing to make the policy clearer about the areas we have described?"; 16 (76.2%) respondents selected 'Yes' (Figure 11).

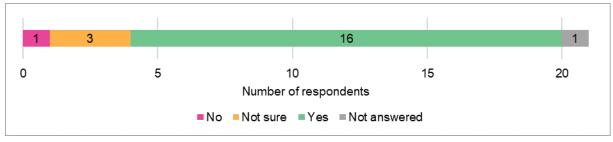


Figure 11: Number of respondents to the easy-read survey by their rating of their agreement to clarifying the transport policy.

Four comments providing context to this question were received. These highlighted that not enough information was provided to explain how SEND transport is ensuring that needs of all children in need are supported, and the need for qualified and skilled staff acting as transport assistants. One respondent criticised the survey design, while another explained their previous transport experiences, and provided suggestions on how they would like to be supported.

"Not enough information about what the planned changes to the policy are - all SEND children are different. How do you come up with a universal plan for all children when they are all different?" (ID6ER, Parent or carer, rating not sure)

"Passenger assistants need to appropriately trained with SEN children and have the ability to communicate (in the child's first language) with the child." (ID5ER, Parent or carer, no rating provided)

"Gosh your questions are not based on what can improve the services but are set in what you want to change. Your questions/survey are not minority friendly at all" (ID4R, Someone else, rating not sure)

"I chose to transport my child to Special School as it's best for him, if I were entitled to receive a Direct Payment to support the cost that would be really helpful." (ID20ER, Parent or carer, rating yes)

## **FURTHER COMMENTS**

#### **MAIN SURVEY**

Towards the end of the survey, respondents were provided with an opportunity to share any other comments relating to the SEND Home to School transport proposals. Respondents were first asked to share comments on whether anything was missed in the proposals, particularly about the impact on certain groups of children and families. This question was completed by 31 (25.2%) respondents.

Most respondents commented on aspects of the **SEND Home to School transport policy**, with five referces to the section on **damages to vehicles**. Of those, one respondent supported the need for costs for damages to be covered by parents for children with behavioural issues,

whilst three respondents took an opposing stance. One respondent suggested sharing copies of **risk assessments** with families. **Transport assistants** were mentioned twice, with references to the necessity of providing passenger assistants to ensure children's safety and dignity and to engage them on long journeys (n=1).

"I also think the policy adjustment about whose responsibility is any damage to the vehicle can be open to interpretation. The nature of SEND is that these children and young people struggle with communication, sensory problems etc and some of these difficulties come out in behaviour and I believe all behaviour is communication so how and who decides what is malicious? I would be very worried about these cases and if they were deemed malicious. I'm not sure you can say that it is malicious damage when the CYP has SEND as this may be deemed as discrimination." (ID102, Parent, guardian or carer)

I find it utterly disgusting you would charge a family for damage caused by a child with SEND by the very definition of their needs by and large these children do not have the cognitive understanding to understand consequences of their actions. This policy is discriminatory. (ID236, Parent, guardian or carer)

"If children are physically disabled it's fine. But a different approach is needed for the badly behaved ones. If such a child does damage a vehicle, the parents should pay". (ID204, General public)

"Passenger assistants only being provided where criteria is reached or exceptional circumstances is a disgusting attempt to pass budget cuts onto vulnerable disabled families....as usual!!! Passenger assistants are essential on most journeys to keep children safe, maintain dignity, to engage children on journeys that can take longer than an hour. These are children with learning disabilities, behavioural problems and medical needs who are extremely vulnerable, an extra adult is required on board vehicles for many reasons, including medical emergency both to drivers and children, road traffic accidents, behavioural incidents, vehicles breaking down and to protect the driver and children from allegations by children and parents. A short-sighted policy change from Warwickshire County Council as usual!" (ID128, Parent, guardian or carer)

*"I'd like each family to receive a copy of the risk assessments that are completed as currently families are not coproducing these."* (ID259, Parent, guardian or carer)

Other respondents highlighted the **impact of Home to School transport on children and young people** (n=7). In four comments, this referred to the lack of transport for extra-curricular activities, the impact of a lack of flexibility to accommodate different timetables (n=2), the impact of the limited transport options for children living in rural areas (n=1); and the need to accommodate the needs of post 16 learners in mainstream settings (n=1).

"From reading the proposals it seems that transport will not be provided for young people to attend after school clubs as this will be outside of the normal school collection times - this may impact negatively on young people" (ID1, Other specialist staff)

"Also, after school clubs are an essential part of social development. By excluding attendance at after school activities, School Transport Policy discriminates and excludes such children from actively participating fully in school life. (ID129, Parent, guardian or carer)

"It would have been better if there is provision for pick ups on after school clubs day. This is because my child has not been joining any school club for physical activity because the transport said since it is a shared taxi, council does not pay for after school club.." (ID163, Parent, guardian or carer)

"I feel there should be more flexibility with transport when a child's timetable is reduced and no transport available at other times of the day, by not having this it impacts on the vulnerable child and their families. Then the child begins to attend less until they begin to refuse to attend school altogether as carers are struggling to meet the requests of the school as there is no other transport options.

Example - Child with severe anxiety on a reduced timetable attending later on in the day and finishing before the end of the school day, no transport available. It takes the carer 25 mins to drive the child to school and may wait as the child is only in for an hour then 25 mins drive home and if a parent is disabled themselves or do not drive. This incurs fuel costs and time when a carer could be having the only time to recuperate as they are caring for the child full time whilst not in school." (ID170, Parent, guardian or carer)

"The impact of children in more rural areas does not appear to be factored in - independent travel training needs to be offered separately from home to school transport as part of preparation for adulthood as many children do not live in areas with easily accessible public transport routes between home and school". (ID288, Other reason)

"Post 16 learners are the group we get most difficulties with (reported by parents and students). All hold EHCP and our 'push' in recent years had been for their needs to be accommodated at mainstream rather than specialist placements. (ID66, Other specialist staff)"

Respondents commented on the **need for transport to be flexible (n**=5). This again referred to the need to provide transport for extra-curricular activities (n=2), pick-up and drop-off locations (n=1); flexibility to react to changes to timetables (n=1); and general need for flexibility (n=1).

"Where transport is provided to and from is important. It was unclear when my son was doing enhanced provision for afternoons how the decision was made that he could only be transported to and from home. The location of transport should be under consultation and risk assessment." (ID294, Parent, guardian or carer)

"The security of transport over quite long distances is a concern for families.... I wonder if the considerably lower costs for the educational setting would offset a most 'flexible' approach in their transport... to enable them to settle and embrace mainstream opportunities, rather than the current barriers we are facing." (ID66, Other specialist staff)

In line with this, six respondents commented on the **impact of transport on parents, carers, guardians and families**. This also addressed the lack of transport for extra-curricular activities (n=2); the lack of consideration for the needs of parents with disabilities (n=2); competing interest within family life (n=2); families with low income (n=1); and security aspects of transport (n=1).

"I think this may negatively impact poorer families as the CYP may score low so be able to access Independent travel but in reality this may not be the best for the CYP. Will there be anyone at home when the child returns off the bus or is anyone to take them to the bus stop etc ( as this is determined by the bus timetable). Some of these children may be more likely to attend school if transport is provided rather than relying on them consistently using independent transport where other family commitments/lack of supervision may lead to them not getting transport themselves?" (ID102, Parent, guardian or carer)

"You should include attendance at before/after school care. Parents of children with SEND have to work too! You are disadvantaging those families where they're trying to stay out of the benefits system and support their families." (ID207; Parent, guardian or carer)

"The security of transport over quite long distances is a concern for families....I wonder if the considerable lower costs for the educational setting would offset a most 'flexible' approach in their transport... to enable them to settle and embrace mainstream opportunities, rather than the current barriers we are facing." (ID66, Other specialist staff)

"Need to look at help for disabled children of disabled parents who find providing school transport difficult." (ID67, Parent, guardian or carer)

"SEND children miss out on extra curricular activities as there individual taxi can only collect them at school finish time, most SEND schools are much further away than the nearest mainstream school, making it impossible for parents to collect the child from extra curricular activities if they don't have their own vehicle.?" (ID8, Parent, guardian or carer)

Some respondents **suggested additional or alternative services** to be considered (n=7). This included signposting of parents and carers to available support for SEND children and young people (n=2); the need for revisions of all aspects of transport not limited to schools (n=2); the provision of travel training independent of SEND transport (n=1), criticism of providing travel payments to parent due to impact on the environment and funds (n=1), the need for collaboration between stakeholders (n=1); a formalised service agreement provided by transport providers (n=1), and a meeting between children and transport staff prior to transport taking place (n=1).

"I think you need to find more ways to target the audience that would benefit from this. I do not mean just this document but having a child with SEND I have had very little help from any of the schools my child attended. No one ever told me I could get help with transport, it was myself that found this out because I needed help being a single mother." (ID138, Parent, guardian or carer) "The impact of children in more rural areas does not appear to be factored in - independent travel training needs to be offered separately from home to school transport as part of preparation for adulthood as many children do not live in areas with easily accessible public transport routes between home and school." (ID288, Other reason)

"Have you considered the financial and environmental decision of offering travel payments first without having regard to any existing transport options?" (ID92, Parent, guardian or carer)

"All areas of transport need to be looked at including young people who go to respite and how they will be affected by it." (ID79, Parent, guardian or carer)

"Problems often occur when young people have to move and social care have to find emergency accommodation for example. This is communicated as quickly as possible, however Transport teams don't seem to have an understanding of the role social care provide and the impact that a delayed response from them has. Better integration between social care and transport teams are required with wider options that include transporting young people to respite from school/college and vice versa is required." (ID177, Other specialist staff)

"I'd like to see families receive an agreement from the taxi or bus to state what they will do to support the family like making sure their staff receive the relevant training and have DBS received and if they are late and let the child down what happens then, there should be a procedure that the taxi or bus company are investigated. All families should meet the transport prior to going in the taxi or bus so the child knows the route and the staff should be consistent!" (ID258, Parent, guardian or carer)

Four respondents referred to the **NAM**. This included the lack of social, emotional and mental health in the assessment (n=2), the need to consider each child as an individual (n=1); the risk of missing hidden disabilities (n=1); the collaboration with other stakeholders to identify any impact on children and young people (n=1); the need to use the NAM alongside using common sense (n=1), the danger of the scoring to leave children without support (n=1).

"I don't think social emotional and mental health have been considered enough in the matrix" (ID156, Parent, guardian or carer)

"Any child or YP and does have specific and sometimes unique needs which should be considered as much as is reasonably possible within the framework outlined. EPs and CAMHS should be consulted where necessary in identifying possible issues or detrimental impact on the child or YP." (ID265, Parent, guardian or carer)

It is essential that tick box exercises are not used to replace common sense. It appears obvious at this early stage that staff will use "well they did not score enough points" as an excuse to not provide transport for individuals that do really need it. This could very easily become a cost cutting exercise leaving some young people not able to access the right education setting to meet their needs" (ID277, Parent, guardian or carer)

*Children with invisible disabilities and mental health difficulties (anxiety) seem to be most disadvantaged as there is no category for this in the needs assessment. (ID288, Other reason)* 

The **application process** was commented on by four respondents. This addressed the eligibility criteria (n=3), in particular the reliance on EHCPs (n=2), and the reliance on being in a catchment school (n=1). One respondent voiced their agreement with the shortened application process, and another respondent stated their criticism of having to reapply for transport annually.

"Not every child with complex needs has an EHCP in place. By excluding them from School Transport eligibility, Warwickshire County Council is actively discriminating against them. It's shameful, and School Transport applications should be open to all children with SEND, with their transport needs then assessed on an individual basis." (ID129, Parent, guardian or carer)

"I agree with not having long forms but I think the whole eligibility criteria you have as a council is disgusting compared to other councils. My nephew got travel training and picked up for school with Solihull council from year 7 and it isn't his catchment school. With you if it isn't the catchment school you just wash yours hands with the kids and leave them to the parents" (ID4, Parent, guardian or carer)

"If the needs of a child is not going to change is there a need to be applying every year? It would take allot of pressure of the transport team If there was a system to identify children where needs won't change to keep them on till parents contact to say they no longer require or moving schools ect?" (ID90, Parent, guardian or carer)

**Funding** was commented on by two respondents. This referred to fuel costs due to inflexible transport provision and timetable changes (n=1), and funding concerns for SEND transport in general (n=1).

"I feel there should be more flexibility with transport when a child's timetable is reduced and no transport available at other times of the day, by not having this it impacts on the vulnerable child and their families. Then the child begins to attend less until they begin to refuse to attend school altogether as carers are struggling to meet the requests of the school as there is no other transport options.

Example - Child with severe anxiety on a reduced timetable attending later on in the day and finishing before the end of the school day, no transport available. It takes the carer 25 mins to drive the child to school and may wait as the child is only in for an hour then 25 mins drive home and if a parent is disabled themselves or do not drive. This incurrs fuel costs and time when a carer could be having the only time to recuperate as they are caring for the child full time whilst not in school." (ID170, Parent, guardian or carer)

"It's too expensive. We are all having to make sacrifices. The rate we are going all the funding will go to the minority whilst the vast majority see services decline." (ID204, General public)

Two respondents asked for **clarifications or additional information**, one of which mentioned the need for a definition of compulsory school attendance, and the other respondent highlighted the need for parents to have access to emergency contacts of transport staff. Another two respondents commented on the **survey design** and asked for alternative formats of information for people to provide their opinion on, and the absence of equality impact assessments for all proposed changes.

"Drivers need to be suitably trained. Parent/carers need to know what the emergency contact details are / who to contact should they need to" (ID 294, Parent, guardian or carer)

"Is this information available in a different format e.g. video, pictures, live presentation in which people could interact and comment/vote on each proposal as it is explained?" (ID21, Education staff/provider (incl. college, early years))

"There does not appear to be an equality impact assessment for each of the proposals individually." (ID288, other reason)

Positive transport experiences were shared by two respondents.

"The company is lovely my kid has. Community transport from Nuneaton" (ID168, Other reason)

*"Our transport community transport based in Bermuda is wonderful cant praise them highly enough" (ID167, Parent, guardian or carer)* 

One respondent each called for an **exclusion of children with behavioural issues from SEND** transport or shared **negative experiences they have had with the WCC Children with Disabilities Team**.

"If children are physically disabled it's fine. But a different approach is needed for the badly behaved ones. If such a child does damage a vehicle, the parents should pay. And this nonsense of taxis is ridiculous. Particularly as they all have chaperones. Where are the parents? People need to take accountability" (ID204, General Public)

"The cwdt are a disgrace useless not fit for purpose and should. E reOlaced by people who can do a job for the kids" (ID167, Parent, guardian or carer)

A second question completing the SEND Home to School aspect of the survey gathered any other feedback that respondents wanted to share; this was completed by 21(17.1%) respondents. Of those, seven respondents commented on the SEND Home to School transport policy. Within this theme, respondents commented on passenger assistants

(n=4), and highlighted concerns for the safety of children (n=2); and the safety of the vehicle driver (n=2). One respondent suggested "stopping the chaperones".

"Secondly as I've commented above the proposal to change criteria for a passenger assistant on board most if not all journeys to specialist provision is dangerous for many reasons. Our vulnerable children deserve and are entitled to safe transportation to school and back. That includes adequate supervision from trained staff, protection from bullying and harassment from other pupils, protection from assault, protection from malicious allegations by drivers and other children. Drivers are also entitled to be safeguarded by the presence of another adult on board their vehicles" (ID128, Parent, guardian or carer)

"I think not having passenger assistance could be very dangerous when transporting more than one child or young person in the vehicle. What happens if they break down, what happens if there is an accident and there is only one adult to supervise vulnerable children and young people. If they need to leave the car how is one person supposed to keep numerous children or young people safe." (ID156, Parent, guardian or carer)

"Stop the taxis. Stop the chaperones." (ID204, General public)

The policy section outlining procedures for **children or young people damaging transport vehicles** was commented on by four respondents. Respondents criticised the wording of this change to the policy, and again called for a definition of a 'malicious act' (n=2). Another respondent pointed out a lack of guidance on how damages to the transport staff's possessions would be handled, while the transparency of assessments of the damage was mentioned in another comment.

"Firstly, I'm interested to know what would constitute a malicious act causing damage to vehicle. How rill rock assessors define what is malicious and what isn't. I wonder how much time your risk assessors and policy makers actually spend with disabled

children? My experience of the school transport service tells me that it's not a lot. This is a disgusting, unsafe proposal and whoever is behind it should hang their heads.... But no doubt won't." (ID128, Parent, guardian or carer)

"I don't think you can classify any acts of damage to a vehicle as deliberate. If the child is heightened anxiety wise or in a meltdown/distress, they can't help their actions and it would be discriminatory to hold them responsible for their actions. It would merely suggest the NAM hasn't been completed properly." (ID293, Parent, guardian or carer)

"Copies of risk assessments should be provided to parents as standard" (ID 294, Parent, guardian or carer)

Five respondents provided further comments on the **NAM**. Of these, three were critical about using this assessment tool, which was explained by stating that children are too different and individual needs should be considered, and one respondent raised awareness to the potential

discriminating effect of the NAM. One respondent stated that costs of transport should not be considered when assessing transport options, and another highlighted the need to consider the family as a whole and parents. A further respondent stated the importance of being able to respond in changes in individual circumstances without causing unnecessary delay through reassessments.

This echoes the need to consider individuality of every child as expressed in the section summarising comments to the NAM outlined on the above pages, and to consider the needs of families in the assessment.

"Always focus on individual needs and made assessments accordingly." (ID109, Parent, guardian or carer)

"What about the families with autistic parents and the autistic children who are "missed" are deemed fine in school (but are not fine in home) due to masking....and not on the send register despite the children being Neurodivergent and the parents also having disability. They need to be included on the matrix too. These children have ADHD and getting them safely to school and back is very difficult." (ID229, Parent, guardian or carer)

"I'm not convinced the proposed assessment model is fit for purpose. As above there is a risk of disability discrimination in your proposed damages policy." (ID242, Parent, guardian or carer)

"The idea of a matrix to determine what is the best method of transport does not make sense. It is trying to get all children to fit into boxes which is unrealistic. It is adding steps to the process which aren't needed and I am struggling to understand how this matrix can change what already occurs. My child's transport meets their current needs but things change. Using this matrix would mean this would have to be reassessed each time there is a change in their needs and would slow down that process. Currently this works well and I cannot fathom why this is looked at changing." (ID95, Parent, guardian or carer)

Further comments relating to the **application process** were addressed by three respondents. These comments include the need for applications to be considered independent of transport costs (n=1); and one respondent stated concerns that by merging school place and transport applications, the information exchange between parents and WCC is limited. In line with the above section on the NAM, one respondent voiced their agreement to the changes to the application process.

"Transport costs shouldn't be used as part of case to refuse or delay a placement" (ID294, Parent, guardian or carer)

"I agree with the proposal to streamline the application process." (ID242, Parent, guardian or carer)

"My concern with the lack of application form means removing another avenue in which parents can communicate their child's needs for transport. This is not covered in their reviews

# but with the application we are given the opportunity to share valuable information that is only relevant to the transport department." (ID95, Parent, guardian or carer)

Potential **risks to discriminate against certain groups of people** were raised by four respondents. These respondents highlighted the detrimental impact the proposals may have on families with parents with special needs, children and masked disabilities, and people with disabilities in general, and non-SEND children (n=1). One respondent highlighted that charging parents for costs occurred due to a child damaging a transport vehicle can be discriminatory.

"I don't think you can classify any acts of damage to a vehicle as deliberate. If the child is heightened anxiety wise or in a meltdown/distress, they can't help their actions and it would be discriminatory to hold them responsible for their actions". (ID293, Parent, guardian or carer)

"I believe this is an expensive provision offered by the council and it should be more the responsibility of parents to fund. It can cost £1000s each year per child and it's not fair on other children who don't have funded transport." (ID115, Parent, guardian or carer)

"What about the families with autistic parents and the autistic children who are "missed" are deemed fine in school (but are not fine in home) due to masking....and not on the send register despite the children being Neurodivergent and the parents also having disability. They need to be included on the matrix too. These children have ADHD and getting them safely to school and back is very difficult." (ID229, Parent, guardian or carer)

"I'm not convinced the proposed assessment model is fit for purpose. As above there is a risk of disability discrimination in your proposed damages policy. I agree with the proposal to streamline the application process." (ID242, Parent, guardian or carer)

Two respondents commented on **funding and costs of transport**. As in the above section, this referred to the lack of funded transport for children without SEND (n=1; ID115), and suggestions about travel allowance. Another two respondents **criticised the provision of taxis** as an option for SEND transport.

"Traveling allowance should pay in higher rate as the fuel cost is rising" (ID164, Parent, guardian or carer)

"Cost of transport should stay inline with HMRC rates." (ID 294, Parent, guardian or carer)

"I think encouraging and promoting SEND kids to use public transport would help equip them for adulthood, rather than the use of taxi's which is unsustainable (costly) for many individuals." (ID20, General public)

The above comment was further represented in the theme '**supporting children to use public transport**' (n=1).

**Positive experiences with WCC staff** were shared by two respondents, highlighting the friendliness, helpfulness and dedication of the WCC transport team.

"The team are fantastic and understanding and they are happy to help and friendly, they took allot of stress out of the situation and recognition needs to be said  $\mathfrak{O}!$ " (ID90, Parent, guardian or carer)

"All of my personal contact with WCC transport services team by phone trying to solve problems and issues (always over late timetables) has been dealt with superbly by this dedicated team... Even if a solution could not be found!" (ID66, Other specialist staff)

One respondent each commented on the **need for timely decisions of the outcome of** applications; flexible transport locations; and respondents shared negative experiences with WCC staff; criticism of the proposed changes; positive experiences with transport providers; and highlighted the need to implement the proposed changes as soon as possible.

"It would be helpful to parents of Yr 13 pupils in special school settings to know in advance if transport is provided or not up to 25 yrs. As parents we need to plan around work and cost implications to parents especially with the squeeze on earnings." (ID125, Parent, guardian or carer)

Many children spend time between two parents at different addresses. The current policy does not allow for that only only to one main address. (ID232, Parent, guardian or carer)

"Tell the cwdt to do some training and stop accepting their uselessness" (ID167, Parent, guardian or carer)

"I do not believe that the proposal is actually an improvement to the current system. It appears to me that it is just a new wording to the same provision with a loophole that will allow an easier ability to refuse transport." (ID277, Parent, guardian or carer)

"Community transport is great with my kid" (ID11, Other reason)

"The proposals seem to be much more comprehensive, but I feel that they should be implemented as soon as possible to alleviate the stress on parents as they await the decision process. Most parents have waited for the school place decision - only recently been applied - and now they have to wait for transport decisions. Qualifying children need urgent introductions into new scenarios and the waiting period can be very detrimental and confusing for them." (ID213, Parent, guardian or carer)

#### EASY-READ SURVEY

Six respondents to the easy-read survey had further comments to share. These comments addressed the need for more flexibility for drop-off locations to accommodate for parents' working patterns (n=1); a concern of providing bus passes as the primary choice of home to school transport (n=1); emphasis on the need to provide information on transport opportunities

to children with SEND (n=1); and criticism of the consultation process and concerns of the accessibility of the survey for different communities (n=1). One respondent each reported to be supporting the changes to the SEND home to school transport in order to improve the service for transport teams and families (n=1); and shared praise of the home to school transport and highlighted helpful transport staff (n=1).

"I feel there should be more than one drop-off or pick-up allocated, so if the parents work and no one is home and that child is with a childminder or family. This should also be another option for that family." (ID1ER, Parent or carer)

"I have a concern that the new transport policy is leaning towards bus passes for the majority of children." (ID5ER, Parent or carer)

"We received this consultation today on 4th of Feb and its a shame WCC have brought it to attention now. And also not very Community friendly. Why do you do this. Its as if you've set what you want to do" (ID4ER, Someone else)

"Any improvements would help, making it easier for families and the transport team" (ID15ER, Parent or carer)

"Ensure more people with SEND children know about transport provision and how to apply for it." (ID7ER, Parent or carer)

"I really value the home to school transport. My son could not attend the best provision for him - his current school if transport is not provided for him. We have a fabulous bus driver and chaperone and it gives us all as a family and my son peace of mind. We couldn't be more grateful. Thank you" (ID12ER, Parent or carer)

## **APPENDIX**

### A – SUMMARY OF PROPOSED CHANGES TO THE APPLICATION PROCESS

Current process	Proposed change	Potential outcomes	
Parents/carers must submit a	The new application process	Simpler and easier for	
separate application to the Council	would remove the need to	parents/carers to apply.	
for home to school transport when	make a separate application.		
school place is confirmed.			
This is submitted only after	Parents/carers would tick a	Transport options	
confirmation of the school place	box when applying for a school	presented to parents /	
has been received, which can	place to say they would like to	carers in a more timely	
leave parents/carers little time to	apply for home to school	way.	
prepare / make arrangements.	transport.		
	When the school/setting has	Parents/carers have longer	
	been named a check would be	to prepare their child for	
	carried out against the	changes in routine / make	
	Council's published criteria.	alternative arrangements.	
	If eligible, transport options	More efficient planning of	
	would be presented to	the transport service /	
	parents/carers.	better value for money.	
	If not eligible, the parent/carer		
	would be informed.		

#### **B – SUMMARY OF THE NEEDS ASSESSMENT MATRIX**

Current process	Proposed change	
The Home to School Transport team	The Needs Assessment Matrix Framework (NAM) would	
use an in-house model for	focus on five areas to identify the needs of the child or young	
assessments.	person:	
	1. Mobility       2. Medical       3. Behavioural	
	4. Vulnerability	
	5. Independent Travel Training	
	Each of the five assessment headings are converted into a	
	matrix. For each heading, a score is calculated and added	
	to the overall score.	
	The current process takes account of the same factors but	
	does not score these on a matrix.	

### C – SUMMARY OF UPDATES TO THE SEND HOME TO SCHOOL TRANSPORT POLICY

Policy section	Policy section Current wording Proposed new wording What this				
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Section 4 - General principles applying to transport provision under this policy for those of compulsory school age. 4.5 - Behaviour	This was previously not mentioned in the Policy	"Where damage occurs to a transport operator's vehicle as the result of the actions of the child, a specialist risk assessor will investigate the incident. Repair costs will only be sought from the child's family if a conclusion is reached by the Council that the damage was the result of a malicious act by the child."	Parents and carers will not be approached for repair costs unless the damage is the result of a deliberate act.		
Section 5 - Provision of transport for those of compulsory school age 5.1 Transport Arrangements	"No transport assistance will be offered to enable children to attend wrap- around provision, work experience, breakfast clubs, paid employment, extra-curricular activities, or any other provision which exists outside of normal school hours. Similarly, no transport will be provided to any site other than the school's main campus. No transport assistance will be provided to college day release programmes, to attend an induction or taster day at another school/college, work experience or other school sites."	Additional wording: "Exceptions to this are: Supported internships/apprenticeships schemes and Specialist placements which include attendance at multiple settings in one day where agreed by the Council in advance (eg. morning at a special school, afternoon at mainstream school)"	It will be clear to parents /carers, children and young people that transport is available if the conditions listed apply.		
Section 5 - Provision of transport for those of compulsory school age 5.1 Transport Arrangements	"Passenger assistants will not be provided on vehicles transporting pupils to schools unless there is a need related to a pupil's special educational needs or disability, or in other very exceptional circumstances."	"Passenger assistants will not be provided on vehicles transporting pupils to schools unless, following a risk assessment, there is a need indicated that is related to a pupil's special educational needs or disability, or in other very exceptional circumstances"	This clarifies the mechanism the Council will use to understand if there is a need for a passenger assistant.		

Policy section	Current wording	Proposed new wording	What this
			means
Section 5 - Provision of transport for those of compulsory school age 5.2 Direct Travel Payments	"Where transport does not currently operate, In the first instance, parents will be given the opportunity to convey the pupil themselves or to make their own arrangements and to receive a Direct Travel Payment (DTP). DTPs will not be provided unless agreed by the pupil's parents."	"In the first instance, parents will be given the opportunity to transport the pupil themselves or to make their own arrangements and to receive a Direct Travel Payment (DTP). DTPs will not be provided unless agreed by the pupil's parents."	Parents/carers, will be given the opportunity to transport their child or young person to school in their own vehicle and receive a direct travel payment contribution towards the costs incurred.