

# SEND Travel Policy Consultation Summary Report

11<sup>th</sup> March – 7<sup>th</sup> May 2024

## Summary:

This policy consultation report presents findings and recommendations based on input from a diverse range of stakeholders, including parent/carers of children with SEND, the Bath Parent Carer Forum, schools, early years settings, and taxi companies. The consultation aimed to align the SEND Travel policy with new Department for Education (DfE) guidance and ensure more consistent decision-making. Stakeholder engagement included in-person events, an online survey, and various communication channels.

The consultation, which lasted eight weeks, involved contacting numerous stakeholders via letters, emails, social media, and press releases. Participants provided feedback through multiple avenues, including an online survey, phone calls, emails, and in-person events.

Key findings revealed general support for most policy changes but significant concerns about the 'Review of Eligibility' and 'Parental Preference' sections. Stakeholders emphasised the need to prioritise children's individual needs and best interests, ensure consistency, and maintain legal compliance.

Based on the feedback, several amendments were made to the final SEND Travel policy, including clarifications and adjustments to terminology and application procedures.

## Introduction:

The purpose of this policy consultation report is to present the findings and recommendations based on a comprehensive consultation process conducted with parent/carers of children/young people with Special Education Needs/Disabilities (SEND), Bath Parent Carer Forum, schools, early years settings and taxi companies. The consultation aimed to gather and feedback on the proposed SEND Travel policy changes, with the objective of bringing the new policy in line with new [Department for Education \(DfE\) guidance](#), as well as allowing for more consistent decision-making.

The consultation process involved in-person events, an online survey, and telephone and email support to engage a diverse range of stakeholders listed above. The input received from the participants provided valuable perspectives and contributed to a better understanding of the potential impacts and implications of the proposed policy changes.

This report will present the key findings from the consultation, analyse the feedback received, and provide recommendations to inform the finalisation and implementation of the policy changes. It aims to ensure that the policy is well-informed and responsive to the needs and concerns of the stakeholders.

## Methodology:

The DfE guidance recommends that Local Authorities consult for a minimum of 28 working days during term time and with affected/potentially affected parent/carers, Parent Carer Forum and schools with potentially affected children/young people. Due to Easter School Holidays, the consultation was open for eight weeks, exceeding this suggested timeframe.

We contacted relevant stakeholders using the following methods:

- Wrote to 477 parent/carers of current SEND Travel support
- Emailed 69 schools (within and outside B&NES)
- Emailed 36 Taxi operators
- Emailed 1724 Rainbow Resource card holders
- Emailed 570 Bath Parent Carer Forum (BPCF) members
- Utilised several Social Media accounts (Live Well B&NES, Corporate, BPCF) for the initial posts and reminders
- Press release was included on the Council's Newsroom

How people could respond:

There were a number of ways in which people were able to respond to the consultation, we had information and a survey on the corporate website, people could telephone Council Connect or use a dedicated email address. We also organised 3 evening events in Keynsham, Westfield and Chew Magna and attended 3 Bath Parent Carer Forum sessions, in Foxhill, Batheaston and Clutton.

### Findings:

The survey questions were broken down into the 10 main areas of change, which gave a brief comparison between the current and proposed policies (see appendix 1).

It is acknowledged that the wording on the consultation page could have been clearer, as it became obvious when reviewing the responses that some people had used the consultation information to answer the questions instead of reviewing the policy. However, people were encouraged to view the policy in several places of the consultation information.

How people responded:

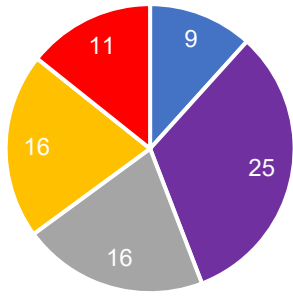
We received 77 online responses, 67 Parent/carers, 9 Schools and 1 early years setting, 3 emails to the dedicated inbox and 2 calls to Council Connect. There were also around 35 attendees at the 6 in-person events. We received a detailed response from Sendias with recommendations and amendment suggestions.

The new policy was also submitted to the Child and Adult Health and Wellbeing Policy Development Scrutiny Panel for discussion and comment; as a result, the new policy was amended to include consideration for the environmental impact when choosing Personal Travel Budget options.

### Analysis:

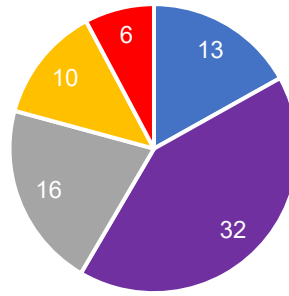
On the whole, the majority of respondents agreed or strongly agreed with most of the changes to the policy:

### Eligibility



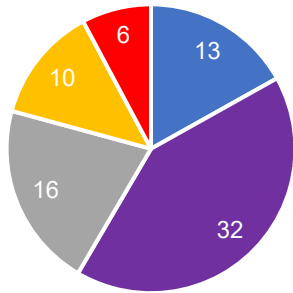
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Personal Travel Budgets



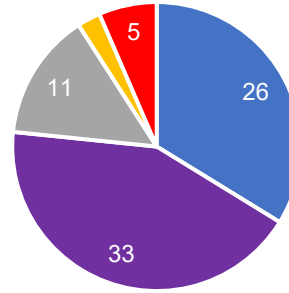
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Personal Travel Budgets



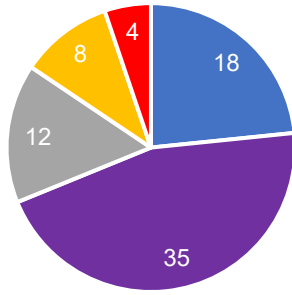
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Applying for travel support



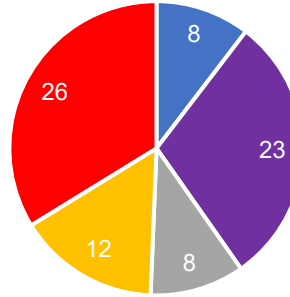
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Terms used in policy



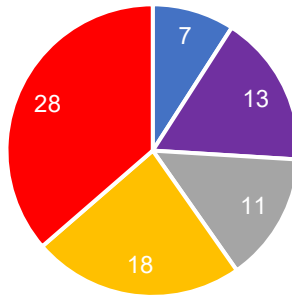
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Review of eligibility



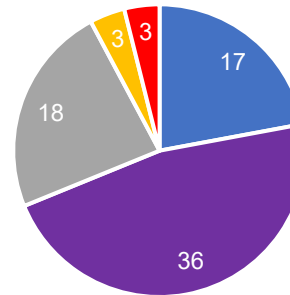
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Parental preference



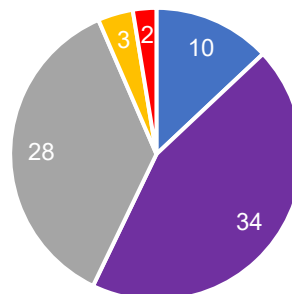
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Behaviour



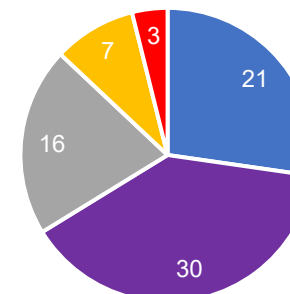
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Exclusions



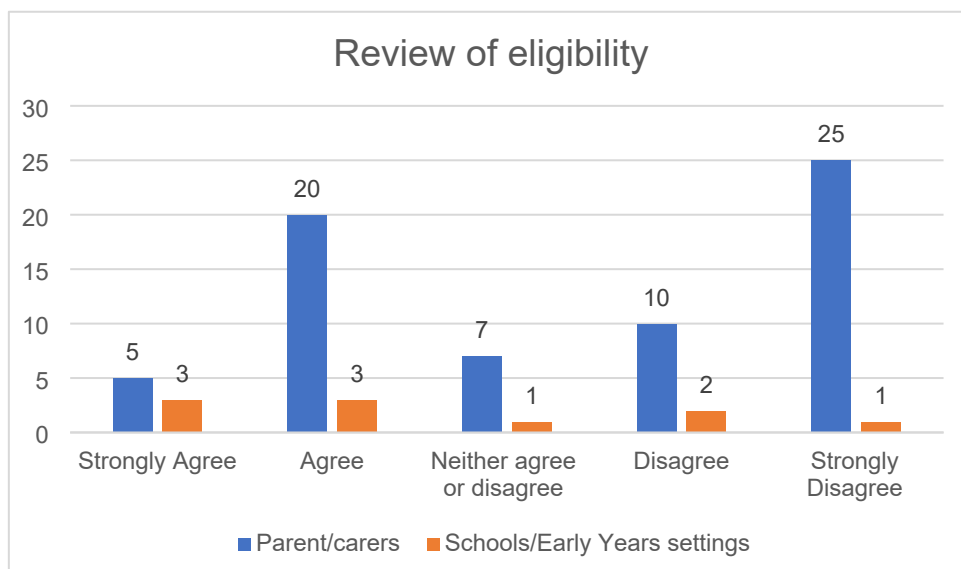
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

### Car seats



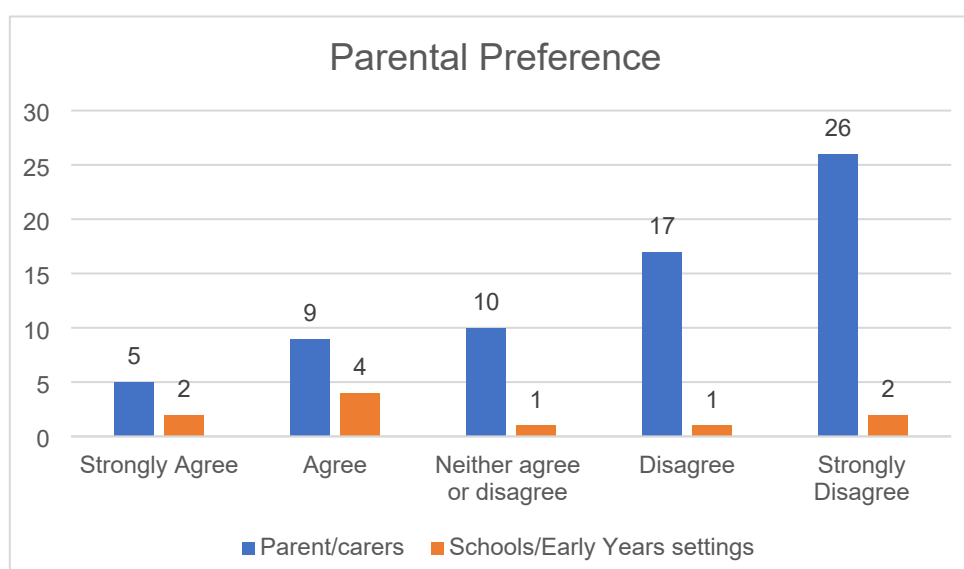
- Strongly Agree
- Agree
- Neither agree or disagree
- Disagree
- Strongly Disagree

However, as you can see from the above charts, there were two main areas of concern from parent/carers, 'Review of Eligibility' and 'Parental Preference'. The below graphs show the breakdown by respondent type and a summary of their written responses to both sections:



Overall, the respondents are strongly opposed to any policy changes that could negatively affect the placement of SEN children in schools based on transportation considerations rather than their individual needs and best interests. They emphasise the importance of consulting with parents and professionals, maintaining consistency and routine for the children, and ensuring that the EHCPs are needs-led and comply with the law.

However, when this subject was discussed at the events, parent/carers were more understanding of the intention behind this section, especially once it was explained that B&NES would always put the child at the heart of all discussions/decisions.



Overall, the comments on the 'Parental Preference' section highlights concerns about the proposed policy potentially being discriminatory, lacking understanding of individual needs and family dynamics, and not prioritising the best interests of the child with disabilities or SEN. There are calls for clearer definitions, transparency, and flexibility to accommodate the diverse needs and circumstances of families.

However, throughout the consultation results, there is indication that individuals have leaned on the consultation data, including the comparison text accompanying the questions, rather than referring to the policy directly. An example of this is evident when individuals raise queries about the term 'nearest school' inadvertently used in the consultation text, while consistently in the policy, the term 'nearest *suitable* school' is used. Additionally, we provide a definition of this term in the glossary at the beginning of the policy document.

### Changes made to the policy following consultation:

After reviewing the consultation feedback, there have been a few amendments to the final SEND Travel policy.

- Alphabetised the glossary
- Changed the header and wording for the 'other policies' section
- Added 'mainstream' after the non-SEND eligibility criteria
- Made some slight wording changes to the Personal Travel Budgets section
- Made it clearer that people only need to apply for Travel Support once
- Highlighted 'suitable school' throughout the document and added a footer referring to glossary for the definition
- Removed some words that were identified by parent/carers as upsetting
- Added that a mileage claim can be used while a child is suspended from transport due to behaviour
- Added an appendix section which includes an appeals flow chart and the behaviour policy

While it is clear that the biggest areas of concern are the 'Review of eligibility' and 'Parental preference' sections, especially around renaming a school on the EHCP, this is something that LA's are legally able to do, on a case-by-case basis, so this will remain in the policy with a slight change to the wording to help make it clear that the child is always considered when making decisions about them.

### Conclusion:

In summary, the response rate relative to the number of invitations extended was notably low. It became evident that certain respondents did not thoroughly review the policy prior to providing their input, instead relying on the consultation materials to guide their responses. While two specific areas raised concerns initially, discussions during in-person engagements revealed widespread acceptance of these sections. Subsequent revisions to the final policy were informed by feedback garnered both through face-to-face interactions and online submissions.

## Appendices

### Appendix 1: Policy comparison

#### **Eligibility for SEN, disability, or mobility problems**

Current policy:

In the current policy we state that we will assess individual eligibility and make transport arrangements for children who can't be expected to walk, (either due to their mobility problems or health and safety issues that relate to their SEN or disability) and whose parents are unable to transport them to school.

Proposed SEND Home to School Travel policy:

- We will assess each child on an individual basis to identify the most appropriate travel option
- We will provide more clarity and information regarding circumstances where a child may be eligible:
  - attending nearest school
  - cannot walk even when accompanied
  - medical condition affects travel
- We will provide more information and clarification regarding medical professional evidence which will be considered

#### **Personal Travel Budgets (PTB)**

Current policy:

PTBs are only referenced in relation to the promotion or presentation of alternate travel options, or as an option for lone travellers.

Proposed SEND Home to School Travel policy:

We will provide clear information about PTBs, including information on how they could benefit service users. We'll also include specific examples of how much you could get based on the number of miles you travel.

We will outline how PTBs can be used, including:

- shared travel arrangements with other parents or carers
- helping you overcome barriers that may prevent parents or carers from accompanying their children to school
- covering the cost of parents or carers driving or cycling with their child to school
- paying for a Guide Escort for the child to walk to school or travel by public transport

#### **Independent Travel Training**

Current policy:

There is currently no specific information provided on Independent Travel Training.

Proposed SEND Home to School Travel policy:

We will include information to highlight the benefits Independent Travel Training.

#### **Applying for SEND HTST**

Current policy:

There is currently no specific information provided on how to apply for SEND Home to School Travel assistance.



Proposed SEND Home to School Travel policy:

We will include clear instructions including anticipated timescales and deadlines. This will break the application process down, making it easier for people to understand and apply for.

### **Explanation of terms**

Current policy:

We currently use the following terms without clear definitions:

- Home address
- Guide Escorts
- Exceptional circumstances
- Nearest school

Proposed SEND Home to School Travel policy:

We will clarify the terms we use within the policy to make it easier for everyone to understand.

For example:

- Home address: where the child resides and spends the majority of their time, it is also the address registered with their GP surgery.
- Guide Escorts: A Guide Escort may be allocated in exceptional circumstances through an SEN or medical assessment, tailored to the student's travel needs.
- Exceptional circumstances: Exceptional circumstances will be recognised for the most vulnerable children when there is a strong need for help but the required transportation criteria are not met.
- Nearest school: When parents or carers apply to the nearest suitable school and the school is unable to offer a place, we may be able to offer travel support for the next nearest school with a place, providing the child meets the eligibility criteria.

### **Review of eligibility**

Current policy:

Reviews of eligibility are currently only referenced in the 'Guiding principles for SEND travel provision'. We regularly assess transport throughout a child's school life to ensure the right level of travel provision is in place.

Proposed SEND Home to School Travel policy:

We will provide more clarity and information on how the review process works and detail the milestones that typically trigger the reviews. Going forward, we may also consider amending the named school on an EHCP if there is a closer, more suitable school that would make more efficient use of our resources regarding school travel support. (Please note that this links to the changes made to mentions of parental preference in the policy, detailed below.)

We will maintain the right to amend the terms of the travel support.

### **Behaviour on school transport**

Current policy:

Information on behaviour on school transport is currently not included in the policy. Instead, we provide information separately by referencing it in our offer letters.

Proposed SEND Home to School Travel policy:

We will provide clarity on expected behaviour (in line with the Behaviour Policy) within the new SEND Travel Policy. We will still reference expected behaviour on school transport in our offer letters.

### **Exclusions**

Exclusions refer to situations where we do not provide travel support.

Current policy:

Exclusions are referenced throughout the policy, but are not laid out clearly in their own section.

Proposed SEND Home to School Travel policy:

We have created a standalone section of the new policy to clearly explain and define the different exclusions.

### **Parental preference**

Current policy:

There is no guidance on parental preference in the current policy.

Proposed SEND Home to School Travel policy:

The proposed policy clearly states that if a parent or carer has requested a school to be named in the ECHP but there is an available place at a nearer, suitable school, the parent or carer will be responsible for transporting their child to and from school.

### **Car seats**

Current policy:

There is no guidance on car seats in the current policy.

Proposed SEND Home to School Travel policy:

The proposed policy provides guidance for parents and carers on what they are responsible for providing until a child reaches a height of at least 135cm (4'5") or turns 12 years old, whichever happens first.

## **Appendix 2: Consultation questions**

### **Questions**

1. In what capacity are you responding to this consultation:

Parent/Carer (go to Q2)

Child/young person (go to Q4)

On behalf of a school or School staff (go to Q6)

Transport providers (go to Q6)

Other (please specify) (go to Q6)

2. Do you have a child/young person with Special Educational Need and/or Disability (SEND)?

Yes

No (go to question 4)

I don't know (go to question 4)

Prefer not to say (go to question 4)

3. Does your child/young person currently receive SEND Home to School Travel support? If so, please select from the following list: (if you have multiple children, please select all relevant options)

Single taxi

Shared taxi

A pass provided by the Council for public transport

Minibus

Coach

Personal Travel Budget

Other, please specify

N/A - my child/young person does not currently receive any SEND Home to School travel support

4 – Do you have a Special Educational Need or Disability, sometimes known as SEND?

Yes

No (go to question 6)

I don't know (go to question 6)

Prefer not to say (go to question 6)

5 - Do you currently receive SEND Home to School Travel support? If so, please select from the following list:

Single taxi

Shared taxi

A pass provided by the Council for public transport

Minibus

Coach

Personal Travel Budget

Other, please specify

N/A - I do not currently receive any SEND Home to School travel support

This next set of questions relates to proposed changes to each section of the policy, as shown on the webpage. For each of the proposed changes, please can you indicate if you agree or disagree with the change and if you disagree, please can you explain your reason.

### **Eligibility for SEN, disability, or mobility problems**

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Proposed SEND Home to School Travel policy:

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- We will provide more clarity and information regarding circumstances where a child may be eligible:
  - attending nearest school
  - cannot walk even when accompanied
  - medical condition affects travel
- We will provide more information and clarification regarding medical professional evidence which will be considered

6 - To what extent do you agree or disagree with the proposed change

Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Personal Travel Budgets (PTB)**

Current policy:

PTBs are only referenced in relation to the promotion or presentation of alternate travel options, or as an option for lone travellers.

Proposed SEND Home to School Travel policy:

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- covering the cost of parents or carers driving or cycling with their child to school
- paying for a Guide Escort for the child to walk to school or travel by public transport

7 - To what extent do you agree or disagree with the proposed change

Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Independent Travel Training**

Current policy:

There is currently no specific information provided on Independent Travel Training.

Proposed SEND Home to School Travel policy:

We will include information to highlight the benefits Independent Travel Training.

8 - To what extent do you agree or disagree with the proposed change

Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Applying for SEND HTST**

Current policy:

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Proposed SEND Home to School Travel policy:

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9 - To what extent do you agree or disagree with the proposed change

Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Explanation of terms**

Current policy:

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Proposed SEND Home to School Travel policy:

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- Nearest school: When parents or carers apply to the nearest suitable school and the school is unable to offer a place, we may be able to offer travel support for the next nearest school with a place, providing the child meets the eligibility criteria.

10 - To what extent do you agree or disagree with the proposed change

Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Review of eligibility**

Current policy:

Reviews of eligibility are currently only referenced in the 'Guiding principles for SEND travel provision'. We regularly assess transport throughout a child's school life to ensure the right level of travel provision is in place.

Proposed SEND Home to School Travel policy:

We will provide more clarity and information on how the review process works and detail the milestones that typically trigger the reviews. Going forward, we may also consider amending the named school on an EHCP if there is a closer, more suitable school that would make more efficient use of our resources regarding school travel support. (Please note that this links to the changes made to mentions of parental preference in the policy, detailed below.)

We will maintain the right to amend the terms of the travel support.

11 - To what extent do you agree or disagree with the proposed change  
Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Behaviour on school transport**

Current policy:

Information on behaviour on school transport is currently not included in the policy. Instead, we provide information separately by referencing it in our offer letters.

Proposed SEND Home to School Travel policy:

We will provide clarity on expected behaviour (in line with the Behaviour Policy) within the new SEND Travel Policy. We will still reference expected behaviour on school transport in our offer letters.

12 - To what extent do you agree or disagree with the proposed change  
Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Exclusions**

Exclusions refer to situations where we do not provide travel support.

Current policy:

Exclusions are referenced throughout the policy, but are not laid out clearly in their own section.

Proposed SEND Home to School Travel policy:

We have created a standalone section of the new policy to clearly explain and define the different exclusions.

13 - To what extent do you agree or disagree with the proposed change  
Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Parental preference**

Current policy:

There is no guidance on parental preference in the current policy.

Proposed SEND Home to School Travel policy:

The proposed policy clearly states that if a parent or carer has requested a school to be named in the ECHP but there is an available place at a nearer, suitable school, the parent or carer will be responsible for transporting their child to and from school.

14 - To what extent do you agree or disagree with the proposed change  
Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

### **Car seats**

Current policy:

There is no guidance on car seats in the current policy.

Proposed SEND Home to School Travel policy:

The proposed policy provides guidance for parents and carers on what they are responsible for providing until a child reaches a height of at least 135cm (4'5") or turns 12 years old, whichever happens first.

15 - To what extent do you agree or disagree with the proposed change  
Strongly agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree, I don't know

Please tell us your reason for your response:

16 - Do you have any further comments about the proposed SEND Home to School Travel policy?

Please state:

17 - How easy or difficult was it to understand the information provided in the proposed SEND Home to School Travel policy?

Options: Very easy, Easy, Neither easy nor difficult, Difficult, Very difficult, I don't know