



The Public Sector Equality Duty

The Equality Duty requires public bodies to have **due regard** to the need to:

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

Protected Characteristics:

- Age
- Disability
- Gender Reassignment
- Pregnancy and Maternity
- Marriage and Civil Partnership (elimination of discrimination only)
- Race
- Religion or Belief
- Sex
- Sexual Orientation

Due Regard means consciously thinking about the three aims of the Duty as part of the process of decision-making. For example:

- How they act as employers
- How they develop, evaluate and review policy
- How they design, deliver and evaluate services
- How they commission and procure from others

Advancing equality of opportunity involves considering the need to:

- Remove or minimise disadvantages suffered by people because of their protected characteristics
- Meet the needs of people with protected characteristics
- Encourage people with protected characteristics to participate in public life or in other activities where their participation is low

Fostering good relations involves tackling prejudice and promoting understanding between people who share a protected characteristic and others.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed in discrimination law. This could mean making use of an exception or positive action provisions in order to provide a service in a way that is appropriate for people who share a protected characteristic.

Officers should:

Keep an adequate record showing that the equality duties and relevant questions have been actively considered.

Be rigorous in both inquiring and reporting to members the outcome of the assessment and the legal duties.

Final approval of a proposal, can only happen after the completion of an equality impact assessment. It is unlawful to adopt a proposal contingent on an equality impact assessment



Title of the Assessment:	Review of Home to School Travel Assistance	Date of Assessment:	11/08/2017
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Stage 1 - Setting out the nature of the proposal and potential outcomes.

Stage 1 – Aims and Objectives	
1.1 What are the objectives of the proposal under consideration?	<p>The Home to School/College Travel Assistance Policies for Central Bedfordshire are being reviewed in order to ensure that they meet the statutory requirements, whilst making the most efficient use of resources.</p> <p>The Council currently provides more transport than is required by legislation. Currently, we transport over 5,000 children/students from home to school each year. In 2016/17 this cost the council over £8.4 million, a rise of over £1.1m from the previous year. Having reviewed the legislation, the council is currently offering services over and above the recognised statutory minimum</p>
1.2 Why is this being done?	<p>Central Bedfordshire Council has experienced reduced levels of government funding in recent years. Grant from national government for this year is half the amount of money received last year, and by 2019/20 this funding will disappear altogether. Meanwhile, there are increasing demands on services as a result of changes to the population.</p> <p>Because of this, the council agreed a budget plan which is designed to maximise cost-effectiveness so that it can deliver the best possible services within available resources. The review of our home to school/college travel assistance policy contributes to our wider budget strategy.</p> <p>The law states that it is the parent/carer’s responsibility to ensure that a child gets to school, including accompanying them if necessary. This includes how their child will get to school and may include making arrangements with a friend or a childminder to ensure that the child is accompanied, or submitting applications as necessary for home to school travel assistance to the Council. It is also the parent/carer’s responsibility to ensure the reasonable safety of themselves and their child between home and the designated pick up points.</p>
1.3 What will be the impact on staff or customers?	<p>The Council is proposing to change the following elements of the Home to School Transport Policies adopted by Executive in 2014:</p> <p><u>Changes to qualifying schools</u></p> <ol style="list-style-type: none"> Travel will be provided from home to nearest available school with a place for that child, rather than to the nearest or catchment school. Where there are ‘pyramids’ of schools then that will be to the next school in the pyramid, rather than to the nearest school. For children with a SEN, it will usually be the school named in their Education Health Care Plan (EHCP).



Changes to age range criteria

- 2. Transport will only be provided for children who are of statutory school age. The Council will no longer provide transport for children under 5 years old.
- 3. Students over 16 years old with an EHCP or a statement of special educational need (SEN) will be required to make a contribution towards the cost of their travel, unless they are from a low income family.

Changes to the travel assistance offered

- 4. The first offer of assistance for middle and upper school pupils (ages 9 -16) will be a travel pass for a public bus or train, rather than supplying contracted buses or taxis. This can help ensure the continuing viability of public bus routes, which can then be used by all members of the public. Buses and trains also help reduce congestion and the number of vehicles on the road, as well as parking issues.
- 5. Where a vehicle is provided to a family through the national Motability Scheme, we will provide parents/carers with a payment to cover the mileage, in order that they can use their specialised vehicle to transport their child to school or college.
- 6. Concessionary passes will be charged at a cost that better reflects the actual cost to the council of providing the transport. Concessionary passes are sold where there are spare seats on a council contracted route. The cost for concessions in 2016/17 was £157 per term. Under the revised scheme charges could vary from £100 - £300 based on journey cost.
- 7. Where a boarding school has been identified as the nearest available school to meet the child’s needs, travel assistance will change for new applicants.

In future, parents/carers will be required to make their own travel arrangements, for which appropriate reimbursement will be made. The council will cover the costs when this is less than the costs of providing travel.

Travel assistance will no longer be provided to parents/carers attending one Statement/Education Health and Care Plan review per year at an out of council area school as this is a non-statutory provision.

Where a Motability vehicle has been provided for the child, travel assistance will be by way of a mileage payment to the parent/carer to attend boarding school.

If there are spaces on a bus to the boarding school provided through our travel assistance scheme, these spare spaces will continue to be offered to pupils who are not eligible for travel assistance, but they will be charged at a fee that reflects the cost to the council.

- 8. Where it is more cost effective, the council could commission the school to run their own bus instead of commissioning a private bus operator. Some schools already run their own minibuses. It therefore makes sense for the school to also use them for pupils to travel to and from school. The schools would receive a payment for this, which in turn would help schools to fund minibuses which are also used for other aspects of school life, such as field trips and sports training/matches.

1.4 How does this proposal contribute or relate to other Council initiatives?

The review of our home to school/college travel assistance policy contributes to our wider budget strategy



1.5 In which ways does the proposal support Central Bedfordshire’s legal duty to:

- Eliminate unlawful discrimination harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it
- Foster good relations between people who share a protected characteristic and people who do not share it

The Council will continue to meet the following requirements:

All children who are in reception year to the end of year 11 qualify for free school transport if they go to their **nearest suitable or catchment school** and live at least:

- 2 miles from the school if they are under 8
- 3 miles from the school if they are 8 or older.

If the family is in receipt of the maximum Working Tax Credit or your children are entitled to free school meals, they will get free school transport if they are:

- I. aged 8 to 11 and the nearest suitable school is at least 2 miles away
- II. aged 11 to 16 and attend 1 of the 3 nearest schools between 2 to 6 miles from the home address
- III. aged 11 to 16 and attend the nearest school of their chosen religion or belief and it is between 2 to 15 miles from the home address

The Council must also make travel arrangements for pupils who are unable to walk to school due to their special educational need (SEN), disability or mobility problems; or because their route to school isn’t safe. The needs of parents / carers are also considered.

1.6 Is it possible that this proposal could damage relations amongst groups of people with different protected characteristics or contribute to inequality by treating some members of the community less favourably such as people of different ages, men or women, people from black and minority ethnic communities, disabled people, carers, people with different religions or beliefs, new and expectant mothers, lesbian, gay, bisexual and transgender communities?

The council is undertaking consultation to ascertain views about the potential impact of the proposals.

Stage 2 - Consideration of national and local research, data and consultation findings in order to understand the potential impacts of the proposal.

Stage 2 - Consideration of Relevant Data and Consultation

In completing this section it will be helpful to consider:

- **Publicity** – Do people know that the service exists?
- **Access** – Who is using the service? / Who should be using the service? Why aren’t they?
- **Appropriateness** – Does the service meet people’s needs and improve outcomes?
- **Service support needs** – Is further training and development required for employees?
- **Partnership working** – Are partners aware of and implementing equality requirements?
- **Contracts & monitoring** – Is equality built into the contract and are outcomes monitored?



<p>2.1. Examples of relevant evidence sources are listed below. Please tick which evidence sources are being used in this assessment and provide a summary for each protected characteristic in sections 2.2 and 2.3.</p>		
<p>Internal desktop research</p>		
<input type="checkbox"/>	Place survey / Customer satisfaction data	Demographic Profiles – Census & ONS
<input checked="" type="checkbox"/>	Local Needs Analysis	<input checked="" type="checkbox"/> Service Monitoring / Performance Information
<input checked="" type="checkbox"/>	Other local research	
<p>Third party guidance and examples</p>		
<input checked="" type="checkbox"/>	National / Regional Research	Analysis of service outcomes for different groups
<input checked="" type="checkbox"/>	Best Practice / Guidance	<input checked="" type="checkbox"/> Benchmarking with other organisations
<input type="checkbox"/>	Inspection Reports	
<p>Public consultation related activities</p>		
<input checked="" type="checkbox"/>	Consultation with Service Users	<input checked="" type="checkbox"/> Consultation with Community / Voluntary Sector
<input checked="" type="checkbox"/>	Consultation with Staff	Customer Feedback / Complaints
<input type="checkbox"/>	Data about the physical environment e.g. housing market, employment, education and training provision, transport, spatial planning and public spaces	
<p>Consulting Members, stakeholders and specialists</p>		
<input checked="" type="checkbox"/>	Elected Members	<input checked="" type="checkbox"/> Expert views of stakeholders representing diverse groups
<input checked="" type="checkbox"/>	Specialist staff / service expertise	
<p><i>Please bear in mind that whilst sections of the community will have common interests and concerns, views and issues vary within groups. E.g. women have differing needs and concerns depending on age, ethnic origin, disability etc</i></p>		
<p>Lack of local knowledge or data is not a justification for assuming there is not a negative impact on some groups of people. Further research may be required.</p>		
<p>2.2. Summary of Existing Data and Consultation Findings: - Service Delivery Considering the impact on Customers/Residents</p>		
<p>- Age: e.g. Under 16 yrs / 16-19 yrs / 20-29 yrs / 30-44 yrs / 45-59 yrs / 60-64 yrs / 65-74 yrs / 75+</p>		
<p>For September 2017 the numbers of entitled pupils for each area are:</p>		
<p>Mainstream – 4911 SEN – 641 SEN P16 – 50 SEN 18+ 32 Mainstream P16 – 68 (This figure from last year was around 140-150, so an increase is expected in applications for this group)</p>		
<p>SEN make up 11% of the students the council transports, post 16 SEN 0.87% and 18+ SEN 0.55%, mainstream 85% Post 16 SEN (max) 2.6%</p>		

School Transport Matters - March 2016

For post 16 students, the rising charges and lack of transport support are likely to limit choice, and affect staying on and completion rates particularly for those from less affluent homes and in rural areas.

The Association of Colleges reports one in five is considering dropping out, often due to transport problems. *“There are human and financial costs every time a young person fails to complete a course or does not achieve a recognised grade”*. (LGA). The Local Government Association estimated that underachievement/drop out by this age group already costs the exchequer £814 million a year (2012 figures).

The effect of high bus fares for young people has been of concern to many organisations including the Youth Council, the Association of Colleges, *pteg* etc. *The iniquity of a national, funded, concessionary fare scheme offering free travel for elderly yet young people on apprenticeships earning as little as £3.30 per hour paying the full fare, is evident.*

Provision and funding is fragmented and young people have borne the brunt of transport cuts across the UK in the past five years, especially in rural England, where access and choice are now increasingly dependent upon private transport. Despite this, the Government wants participation in education and training, including apprenticeships, to rise for 16-18 year olds, and to reduce NEETs

SNAP PCF review of the consultation regarding proposals to change the ‘The Home to School/College Travel Assistance Policies for Central Bedfordshire’

Contribution for 16+

This is lawful but CBC should avoid indirect discrimination. Will the contribution be set at a similar level to that of a bus pass for non-SEND students? The local authority should also consider that students with SEND may have to travel further to a suitable course.

Post 16 young people with SEN will be required to make a financial contribution. What is that contribution and are the Council looking at the bigger picture here? Will you be measuring your NEET figures as young people are forced to pull out of their courses, therefore risking that from 2018 fewer people take up further education?

- **Disability:** *e.g. Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement*

Guidance Special Educational Needs and Disabilities Code of Practice 2015

Transport

4.48 Transport can be an important factor in the support for children and young people with SEN or disabilities. The Local Offer must include information about arrangements for transport provision, including for those up to age 25 with an EHC plan, and this should include local authorities’ policy statements.

4.49 Local authorities must ensure that suitable travel arrangements are made where necessary to facilitate an eligible child’s attendance at school. Section 508B of the Education Act 1996

requires local authorities to make such school travel arrangements as they consider necessary for children within their area. Such arrangements must be provided free of charge. Section 508C of the Act gives local authorities discretionary powers to make school travel arrangements for other children not covered by section 508B. Such transport does not have to be provided free of charge.

4.50 Local authorities must publish a transport policy statement each year setting out the travel arrangements they will make to support young people aged 16-19 and learners with learning difficulties and/or disabilities (LDD) aged up to 25, to access further education. This should include any arrangements for free or subsidised transport.

4.51 Local authorities must include in their Local Offer information about:

- any specific arrangements for specialised transport (for example, specially fitted buses)
- any support available from the local authority or others with transport costs and should include information about:
- any support that is offered to children and young people to help them use transport, including public transport, and
- any training given to aid independent travel

Research:

Still missing out? Ending poverty and social exclusion: messages to government from families with disabled children – Barnados 2002

At present, a disproportionate number of families with disabled children are living in poverty, for the numerous reasons, including:

- Work – parents with disabled children are often unable to work because they cannot secure childcare suitable for their child's needs.
- Extra costs – on average it costs three times as much to raise a child with severe impairment than a non-disabled child.
- Transport – many families have unmet needs, as most public transport is inaccessible and cabs are expensive.

Contact A Family:

- 52% of families with a disabled child are at risk of experiencing poverty.
- The income of families with disabled children averages £15,270, 23.5% below the UK average income of £19,968, and 21.8% have incomes that are less than half the UK mean

Prevalence of childhood disability and the characteristics and circumstances of disabled children in the UK Blackburn Spencer and Read 2010

Almost half of disabled children (compared with a fifth of non disabled children) live with a parent who is also disabled. In addition, a quarter of disabled children live with one or more siblings who are also disabled

Contact a Family Guidance

Are all children with special educational needs (SEN) or a disability entitled to free transport?

The law says that local authorities must provide transport to pupils who would be unable to walk to school because of their SEN, disability or mobility problems. It does not matter how short the distance is, or whether a pupil has a statement or EHC plan. Some children with SEN may be able to walk to school. Local authorities must assess a child's transport needs individually.

What kind of transport is provided?

Local authorities can provide different kinds of transport, including a dedicated taxi or minibus service with or without an escort, car mileage allowance, bus passes, or travel cards.

How does the local authority decide which kind of transport is most suitable for my child?

The local authority should consider your child's individual needs. You should provide clear information about your child's SEN, disability and any health needs when you apply for transport. The local authority should decide if your child requires special arrangements such as an escort, or equipment such as specialised seating. To be suitable, transport must be safe and 'non stressful'. This means that your child arrives at school ready to learn.

Can the local authority refuse transport for a child who gets higher mobility Disability Living Allowance (DLA)?

Local authorities cannot have policies that introduce additional criteria for transport, for example refusing transport to children receiving higher mobility DLA, children whose parents have cars, or children without EHC plans. This is unlawful.

My local authority won't provide transport as I get a motability car and the local authority says I can drive my child to school.

The local authority must provide transport to the nearest suitable school for children who are eligible for transport. Receiving higher level disability living allowance is not one of the eligibility criteria. The local authority may discuss individual travel arrangements with you, but they can't make this a criterion for transport.

Further Education

- Disabled young people are at particularly high risk of being NEET between the ages of 16-19
- 21% of disabled people aged 16 – 24 have no qualifications, compared with 5% of non-disabled people of the same age
- Disabled students account for only about one in 20 undergraduates

Contact a Family Guidance

Will my child get transport to college?

The local authority must have a transport policy which sets out how they will support young people aged 16 -18 to get to school or college. The policy must also say what help is available for students with SEN and disabilities. Local authorities do not have to provide free help to this age group and may ask families to contribute to the cost of transport.

Local authorities must also set out how they will help disabled adult learners over 18 to get to a place of education and training. Help could mean a taxi or bus, discounted fares, travel cards or travel training. Local authorities should always consider the young person's individual needs before making a decision. Transport needs should be discussed as part of an [EHC needs assessment](#). The college may be able to help with transport. Social services may agree to fund transport in some situations.

Contact a Family Inquiry into School Transport for Disabled Children 2017

School transport is an integral part of a child’s education. If a child can’t get to school or has a stressful experience getting to school, they are not able to learn and take part in the school day like other children. School transport sits outside special educational needs (SEN) law in England, but is part of general education law.

- 48% say they agree or strongly agree that travel arrangements for their child to get to school mean that they can’t work, or have to work reduced hours
- 27% agree or strongly agree that their child’s journey is making it harder for their child to learn at school
- 23% say that their child’s journey to school is stressful most of the time

Impact on children when Transport is refused or removed Parents reported that it unsettles the child or young person, inhibits learning, increases feelings of isolation, loneliness and impacts on friendships, perpetuates division and feelings of exclusion.

Impact on families when Transport is refused Families talk about financial strain when transport is refused, mostly due to reducing working hours. Respondents repeatedly talked about the stress on them and their whole family, and sadly the loss of independence for their disabled children and young people.

Post 16

The local council must have a transport policy which sets out how they will support young people aged 16 to 18 to get to school or college, including disabled students. Help could mean a taxi or bus, discounted fares, travel cards, or travel training. Local councils should always consider the young person’s individual needs before making a decision. The introduction of a charging policy may be within the law as far as transport law goes. However, a local council may be failing in their duty under the Equality Act to: ‘advance equality of opportunity for disabled learners’ if the charge in their transport policy has a: ‘significant negative impact on the ability of disabled students to access education’.

Apart from what we already know about the financial impact of raising a disabled child, transport costs may be higher for disabled students.

1 All 16 to 18-year-olds have a duty to participate in some form of education or training. However, many disabled young people will need to be in education or training longer than this in order to achieve the particular skills or qualifications they need to reach their full potential.

2 Disabled students’ nearest suitable course or college may not be the local college. It may be some distance from their home.

3 Young people who cannot access public transport easily due to their disability will not be able to take advantage of the usual subsidised travel schemes that are open to other students – taxis are more expensive.

- 50% strongly agree or agree travel arrangements are too expensive (34% for all ages).
- 48% agree or strongly agree that travel arrangements for their young person to get to school mean that they can’t work, or can only work reduced hours (consistent with all ages)
- 31% agree or strongly agree that their child’s journey is making it harder for them to learn at school (slightly higher compared with all ages)
- 24% say the journey is stressful most of the time (consistent with all ages)

Suitability of Transport

The majority highlighted issues in terms of safety, training and communication. These can be summarised as:

- no escort or untrained escort
- unsuitable for child’s needs (for example, child cannot travel with other children)
- vehicle unsuitable (for example, cannot take wheelchair)
- journey stressful – too long, doesn’t coincide with school hours, unsuitable pick up or drop off points
- mileage allowance insufficient or offered inappropriately
- transport inflexible – doesn’t allow attendance at after school activities or transport to a place other than child’s home (for example, childminder)
- communication issues:
 - between the transport provider, escorts, drivers and families with regards to cancelations, changes to driver or pick-up times
 - language barriers, e.g. not trained in British Sign Language, English as a second language
- outsourcing:
 - changes to charges
 - quality and training of drivers and escorts
 - unsettling to children who require continuity
- safety – concerns included drivers and escorts who do not follow the law, for example speeding, smoking.

HCT group is a **transport social enterprise** operating a range of commercial and community transport services. They have worked with commissioners who have come up with some smart commissioning options to help reduce costs without impacting on quality, for example:

- **blended commissioning** – using the same fleet to deliver services to different client groups, (SEN, school swimming, school dinners), thus utilising vehicles during down time
- **altering school start times** so you can use half the number of vehicles to drop the same number of children, thus reducing the fleet and associated costs
- **allowing parents to pick from a set of drop off/pick up points**, often alongside other mainstream schools. This has helped parents who have other children to get to school combine the journeys, and resulted in shorter journey times for all.

Conclusions

Families with disabled children often face significant additional challenges in their daily lives, and the difficulty of obtaining suitable transport to school or college is adding to this. Unsuitable transport is affecting children or young people’s wellbeing and progress in education, as well as family life. The cost of school transport for some is causing additional financial hardship. Many parents are unable to work due to the need to make school transport arrangements for their child.

Families with disabled children face additional challenges around school transport not experienced by other families including:

- disabled children may go to different schools to siblings – requiring separate journeys and pick up times
- disabled young people may need longer to complete their education – so families are bearing the cost of transport for longer
- lack of local specialist provision for disabled children and young people. This often means they are travelling further to their nearest suitable place of education – families struggle to provide transport as it is more expensive and time consuming

School Transport Matters - March 2016

Although the number of pupils affected by planned cuts to special needs transport is likely to be lower – as only about 115,000 pupils in England currently qualify for free transport because of their special needs. About half of pupils with EHCs currently receive transport - and those pupils with EHCs typically have the more severe /higher level of special needs. It is expected that cuts to services for these pupils will have considerable adverse impact on many families

CEREBRA - Local Authority Home to School On-line Transport Policies: Accessibility and Accuracy University of Leeds – School of Law

Transport is a crucial service for disabled children and their families. Referrals to the Cerebra in-house advice team concerning difficulties with school transport have been one of the most common problems it has encountered, amounting in 2015 to 17% of all cases, rising to 19% in 2016. Discussions with other charities providing advice for disabled children and their families indicated that they too had identified this issue as a particular problem area.

Cases referred to the LEaP Project have concerned a range of difficulties that families experience in obtaining suitable school transport, including:

- the unsuitability of an individual’s transport arrangements (e.g. due to journey length, stress, noise levels, changes in the ratio of escorts to pupils, changes in the mode of transport etc.);
- the refusal to provide transport for children with disabilities or special educational needs who live within the statutory walking distance of their school;
- inadequate driver and escort training;
- late arrival at school as a result of reconfigured routes;
- a failure to provide transport to a school named in an individual’s statement of special educational needs or Education, Health and Care plan;
- the withdrawal of transport at short notice by transport providers on the grounds of a child’s challenging behaviour;
- delays in making alternative transport arrangements.

The most common problem referred to the LEaP Project has been the refusal to provide transport for children with disabilities or special educational needs (SEN) who live within the relevant statutory walking distance from their nearest suitable school.

Some of the ways in which local authorities have misinterpreted their statutory duties include:

- imposing a ‘blanket ban’ on the provision of transport for any child who lives within walking distance of their nearest suitable school (regardless of their ability to walk to school - alone or accompanied);
- excluding any reference in their transport policies to children who are eligible for transport under the Education Act 1996 (i.e. because they cannot reasonably be expected to walk to school, due to their special educational needs, disability or mobility issues);
- providing transport on a discretionary basis, rather than as a statutory entitlement;
- providing incorrect information to parents of disabled children as to their rights;
- requiring parents who have access to a vehicle to drive their children to school;
- poor communication issues between LA’s and parents;
- expecting families to use disability benefits to cover transport costs.

Examples encountered by the LEaP Project of where it may be unreasonable for a child to be expected to walk unaccompanied or otherwise might include where the child concerned:

- experiences physical pain or has difficulty walking long distances;
- has bladder or bowel problems;
- is vulnerable or unable to understand dangers;
- is unable to negotiate the route to school because of busy/difficult routes;
- has unpredictable behaviour

When considering the ‘reasonableness’ of this expectation, authorities are entitled to consider whether the child could walk to school if accompanied by a parent. The guidance states that a parent is generally expected to accompany their child to school ‘unless there is good reason why it is not reasonable for a parent to do so’.

Circumstances encountered by the LEaP Project of where it **may be unreasonable for a parent to accompany their child to school can include:**

- a parent may be unable to ensure the safety of a child who has unpredictable or challenging behaviour;
- parent may have a disability which prevents him/her from walking a child to school;
- the parent’s journey to and from school could take an unreasonable amount of time;
- the child’s siblings may need to be taken to different schools;
- the child’s siblings may have to be left at home unattended before and after school if a parent has to accompany the child to school.

The Guidance states in addition that an assessment of ‘reasonableness’ would also consider ‘the age of the child and whether one would ordinarily expect a child of that age to be accompanied’. For example if the child is 15, the question to be asked is **‘would it be reasonable to expect a parent to accompany their 15 year old child without a disability to school?’** If the answer is no, then it would be discriminatory to expect a parent to accompany their 15 year old simply because they had a disability

Other relevant legal considerations include:

- ‘Disability’ as a wide concept, including in addition to physical impairments, mental impairments and illnesses;
- Local authority policies cannot impose additional (or more demanding) requirements beyond those detailed in the legislation;
- It is not a prerequisite for a child to have a Statement of SEN or Education, Health & Care Plan.
- **Parents should not be required to use DLA** (Disability Living Allowance) to pay for the school transport required by the disabled child;
- Evidence from professionals may support a transport application but is not a legal requirement

Under the question ‘does the policy make it clear that children who *cannot reasonably be expected to walk* to school because of their SEN, disability or mobility issues are entitled to transport’ it was found that 39% of policies did not make this right clear - with comments referring to restrictive and or extra criteria including:

- ‘parents are expected to drive children who have a temporary medical condition to school’ ‘;

- such children ‘will be considered’ (rather than being “entitled”);’
- ‘mobility issues must be ‘significant, long-term and severe’;
- ‘that pupils with a statement of SEN/EHC plan must make their own arrangements to school’;
- ‘pupils with SEN attending mainstream school are not entitled to transport’;
- ‘an EHCP is required to be entitled to transport’;
- ‘*certain* long term disabilities [will be considered]’;
- ‘firstly, parents should look for help from family members and neighbours’

These findings confirm the concerns identified by the LEaP Project and other bodies that many local authorities are not assessing eligibility based on the law and guidance. Instead, their staff appears to be guided by incorrect information as to individual rights; by policies that exclude references to the SEN, mobility and disability category; by an expectation that parents will drive their children to school; and by the notion that such support is merely ‘discretionary’.

SNAP PCF review of the consultation regarding proposals to change the ‘The Home to School/College Travel Assistance Policies for Central Bedfordshire’ 2017

Motability

The proposed changes document state:

‘Where a vehicle is provided to a family through the national Motability Scheme, we will provide parents/carers with a payment to cover the mileage, in order that they can use their specialised vehicle to transport their child to school or college.’

SNAP believes a mileage allowance can only be given with parents’ consent. See fig 2, Education Act 1996 s508B (4)

(4) “Travel arrangements”, in relation to an eligible child, are travel arrangements of any description and include—

(a) arrangements for the provision of transport, and

(b) any of the following arrangements only if they are made **with the consent** of a parent of the child—

(i) arrangements for the provision of one or more persons to escort the child (whether alone or together with other children) when travelling to or from the relevant educational establishment in relation to the child;

(ii) arrangements for the payment of the whole or any part of a person's reasonable travelling expenses;

(iii) arrangements for the payment of allowances in respect of the use of particular modes of travel

There is no exception in legislation applying to Motability cars. Therefore, the wording should be changed to ‘*We will offer a mileage payment with parents’ agreement*’. SNAP would like clarification of what is the amount to be paid and how would families claim this?

The mobility cars are subject to a three-year lease and have a 60,000-mileage limit in those three years, anything over this figure is then charged at five pence a mile. If a parent decides to cancel their mobility car and take the extra payment they will be subject to a £250.00 administration fee. Parents who have a disabled child are already more likely to live in poverty; this policy helps to increase this situation.

SNAP would like to clarify, if a parent carer has a mobility car, is the council suggesting that they

will no longer be entitled to their free school transport? If this is the case then parents who work may no longer be able to continue in employment.

There will also be more congestion on the road as, instead of one mini-bus collecting six children, there will now be an extra five cars on the road.

Mobility cars do not have a hoist, therefore a parent carer will not only have to travel to their special school, which for the majority will not be local to them, they may have extra lifting to do twice a day, five days a week.

In addition, the parent may now have a two-hour round trip to get to and from school, twice a day equaling four hours. This may be when the parent carer sleeps if they have been up through the night caring.

The roads around the schools will be more congested. There is a potentially dangerous impact of this, furthermore, what happens when the parent is sick and unable to drive the child to school?

Some of our children have profound needs and while a mainstream parent may be able to ask a neighbour or friend to help, our families rarely have access to this support.

Under fives

How many children under five do you transport currently?

The Council for Disabled Children has written a report on how disabled children fall further behind even at the start of their early years education aged two years of age – they rarely ever catch up. This transport consultation helps to accelerate this. This is potentially discriminatory.

Children without SEND are likely to be in nursery or reception class close to home. Children with severe / complex needs may attend special schools at some distance from their home. LAs must offer full time reception places from the September after a child's fourth birthday, so disabled children will be disadvantaged if they cannot access education until they turn five due to a lack of transport.

There should not be a blanket policy not to provide transport for under fives

With regards charging for transport, we note there will be a reduction of up to £57.00 for some families and an increase of £143.00 for others. How will this be calculated and what is the criteria?

Please clarify what the cost is for travel as at the moment it states, 'a fee that reflects the cost to the council'. This is ambiguous. Parents need accurate information to fully understand the impact to them before completing a consultation.

Offering a travel pass in the first instance is reasonable but for children with SEND it must take account of the needs of the child, not be a blanket policy. Some young people with SEND will not be able to travel by public transport until well into their teenage years and others may never achieve that level of independence.

Pyramid of schools?

Please clarify 'travel will be provided from home to the nearest available school with a place for that child, rather than the nearest or catchment school'. Also, what is a 'pyramid of schools' and how may this affect children and young people with an EHCP? Who decides what is suitable, who decides what criteria will be used? How will it impact on school preference and admissions for children going through the normal admission system? SNAP notes that the actual draft policy only refers to the nearest qualifying school.

Travel Training

Nine years of age is young to expect children to travel on public transport. What is being done to assess the safeguarding issues around this? Will schools be supporting vulnerable children with ‘travel training’? If so who will fund this?

Boarding school

SNAP feels the term ‘boarding school’, may be misleading. If SEN Residential Provision is included as part of this phrase, it needs to be clearly communicated. In order to participate effectively, families need to properly understand the consultation. How many families use this service, what are the costs?

Eligibility

The actual draft policy sets out clearly the legal eligibility criteria for free travel arrangements applying to all children

- Distance
- Low income families
- Unsafe walking route

The list does not include children unable to walk because of a mobility difficulty, disability or special educational need. This is covered separately and linked to children with an EHCP. The disability criteria should be listed at the top level along with the others.

Distance criteria and qualifying schools

The explanation and the consequence of the change is not clear. The legal requirement is to the nearest suitable school. This is defined by statutory guidance as the nearest qualifying school with places available which provides education appropriate to the age, ability and aptitude of the child and to any special educational needs he may have. The geographically nearest school may not be the nearest suitable school. The policy should reflect this. Will families have to change their child’s school as you will now only transport to the ‘nearest school with a place for that child’?

The proposed changes document states: ‘For children with a SEN, it will usually be the school named in their Education Health Care Plan (EHCP).’ This is too vague the following wording may be better. *‘For children with an EHCP the nearest qualifying school will be the school named in the EHCP where this is the only school named or the closest of 2 or more schools named.’*

EHCPs

‘Suitability’ applies to mainstream not just Special schools. In some cases, the nearest mainstream school may not be suitable for an individual child’s needs. The policy should make this clear.

The paragraph on EHCPs should be linked to that on medical conditions. The term ‘medical condition’ should be replaced by ‘special educational need, disability or mobility problem’ to match the legislation. Otherwise there is a danger that the policy will be interpreted in an unnecessarily restrictive way.

It must be made clear that the needs of this group will be individually assessed and that the distance criteria to not apply.

Public transport for mainstream schools

The loss of contract school buses may place some children with SEND at a disadvantage. There will be a group of children who may be able to travel on a dedicated school bus but would not be able to manage public transport.



- **Carers:** *A person of any age who provides unpaid support to family or friends who could not manage without this help due to illness, disability, mental ill-health or a substance misuse problem*

Contact A Family:

- One in five say that isolation has led to the break up of their family life (Forgotten Families, 2011).
- 72% of parents / carers experience mental ill health such as anxiety, depression or breakdown due to isolation (Forgotten Families, 2011).
- Between 46% and 62% of carers are not getting adequate services to help them work.

The CBC policy includes provisions for transport to be provided if a parent / carer has a medical condition or has needs which make it unsafe for them to accompany their child.

- **Gender Reassignment:** *People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex*

None identified

- **Pregnancy and Maternity:** *e.g. pregnant women / women who have given birth & women who are breastfeeding (26 week time limit then protected by sex discrimination provisions)*

None identified

- **Race:** *e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other*

The public consultation highlighted that *“If transport is withdrawn for 4 year olds this would have a hugely detrimental impact on the early years education of Traveller children which could result in children missing the entire Reception year as parents would choose to keep their children at home until they could access the transport.”*

- **Religion or Belief:** *e.g. Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other*

None identified

- **Sex:** *e.g. Women / Girls / Men / Boys*

None identified

- **Sexual Orientation:** *e.g. Lesbians / Gay men / Bisexuals / Heterosexuals*

None identified

- **Other:** *e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership*

Social Class:

- Babies with professional or managerial parents develop better and faster than those whose parents are in unskilled or semi-skilled manual occupations.
- By age 6, low-achieving children from more advantaged homes will out-perform initially high-achieving children from less advantaged homes

Ethnicity:

- Some groups are far less likely to use pre-school education: - Poor White families and Pakistani heritage families.
- Just 77% of 3 & 4 year old ethnic minority children use early years provision, compared to nearly 87% of white children.

Disability:

- Early education provision for disabled children is poor. One study of childcare providers found that just 50% of day nurseries & only 40% of playgroups were able to offer facilities for children with impairments.

Intervention: Home Learning Environment (HLE) & Pre-School Provision:

- Success at school can be significantly increased according to what families do for under-5s in the home, and experience of pre-school education.
- Children's later achievement in language, reading and number ability improves if they attend good pre-school provision.
- The most important factors associated with a poor HLE are having:
 - English as an additional language and
 - having three or more siblings
- Contributory factors include having a mother with a low level of education, early developmental problems, and living in an area of high deprivation.

Children with these characteristics are at significantly greater risk of under-achievement before they have even entered school

The latest statutory guidance - Home to School Travel and Transport Guidance, Department for Education, July 2014 and Post 16 Transport to Education and Training, Department for Education, February 2014;

Councils are entitled to consider whether it's reasonable to expect a parent to accompany their child along a walking route, but they cannot insist that parents who have a car should be expected to drive their child to school.

<http://w3.cerebra.org.uk/research/more-school-transport-success-for-the-legal-entitlements-research-project/>

School Transport Matters – March 2016

Cuts to school transport services compound the problems for local buses in rural areas - as fewer children travel to school by bus, services will cease to be commercially viable for operators. In addition, the registration of school services for use by the general public can provide vital peak hour bus services for rural areas at minimal additional cost.

How school transport is provided

Local authorities can provide school transport to eligible pupils using a variety of modes - most typically they contract with local operators of taxi, private hire, minibus, coach or buses to provide services. All local authorities in Great Britain are under a duty to coordinate social care, education and local bus transport to achieve value for money. If there is a local bus service that can be used, the expectation is that season tickets should be purchased for use on this rather than utilising a duplicate contracted route.

Likewise, if there is a contract provided for school children, it would often be appropriate for this to be registered to become a local bus service and available to the general public.

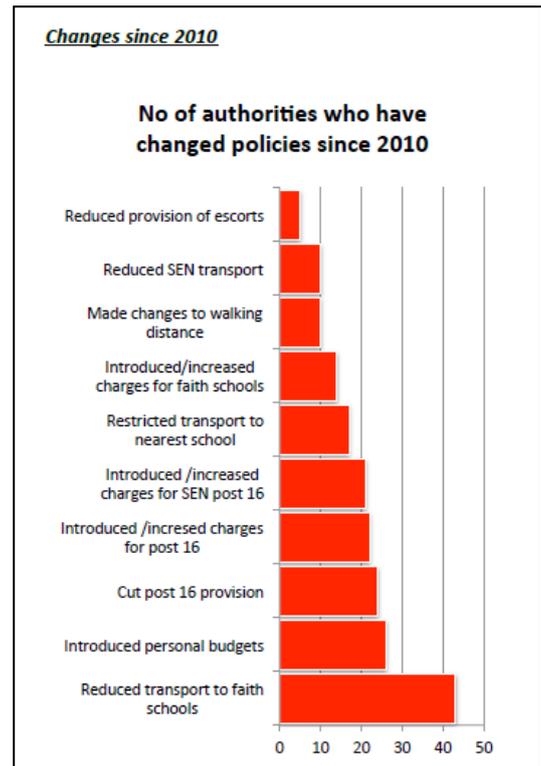
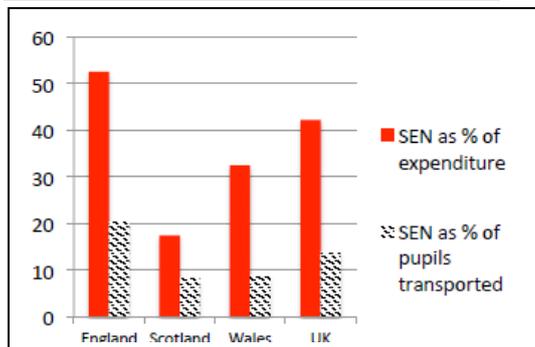
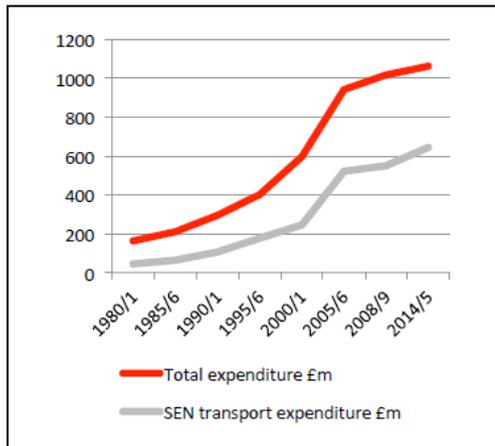
Unit costs

Overall expenditure figures suggest average unit costs of transport in England are about £1,800 per pupil and £1,400-1,500 for the UK.

For mainstream pupils the average cost is about £900 per year, equivalent to £2.37 per trip.

For pupils with special needs, the average cost is over £4,000 per year - equivalent to nearly £11 per journey.

The survey responses suggest that special needs transport is now accounting for about 53% of all school transport expenditure in England, and about 42% across the UK, however, it accounts for about a fifth of pupils transported in England and 14% in the UK as a whole.



Other ways of managing budgets

Promoting travel training and independent travel Many local authorities reported investing in travel training to promote more independent travel by young people with special needs, and also to reduce the costs of door-to-door transport provision.

Introducing personalised budgets

Many English local authorities also reported introducing personalised budgets, with twenty-six saying these had already been introduced, and another nine authorities planning their introduction.

Promoting sustainable travel

Nearly 90% of local authorities said that their authority was promoting walking and/or cycling to and from school. Twenty-four authorities said that they had invested more in walking and cycling since 2010, but conversely 13 said they had cut their investment in walking and cycling. Half of respondents said there had been no change.

Local authorities report that funding cuts remain the main challenge facing school transport in coming years - with almost 60% of authorities citing budget cuts as their main concern, followed by the pressure on authorities to meet greater levels of pupils' needs, and parental expectations. Local authorities responding appear to be resigned to continuing to cut and/or charge for SEN



and post 16 transport. Nine authorities also reported turning their focus to escort provision, and are expecting to reduce the level and costs of this

There remain concerns about the environmental, health, and congestion impact of continuing rises in car use, and the social impact of the loss of rural bus services.

**2.3. Summary of Existing Data and Consultation Findings – Employment
Considering the impact on Employees**

- **Age:** e.g. 16-19 / 20-29 / 30-39 / 40-49 / 50-59 / 60+ **Not Applicable**

- **Disability:** e.g. Physical impairment / Sensory impairment / Mental health condition / Learning disability or difficulty / Long-standing illness or health condition / Severe disfigurement **N/A**

- **Carers:** e.g. parent / guardian / foster carer / person caring for an adult who is a spouse, partner, civil partner, relative or person who lives at the same address **N/A**

- **Gender Reassignment:** People who are proposing to undergo, are undergoing or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex **N/A**

- **Pregnancy and Maternity:** e.g. Pregnancy / Compulsory maternity leave / Ordinary maternity leave / Additional maternity leave **N/A**

- **Race:** e.g. Asian or Asian British / Black or Black British / Chinese / Gypsies and Travellers / Mixed Heritage / White British / White Irish / White Other **N/A**

- **Religion or Belief:** e.g. Buddhist / Christian / Hindu / Jewish / Muslim / Sikh / No religion / Other **N/A**

- **Sex:** Women / Men **N/A**

- **Sexual Orientation:** e.g. Lesbians / Gay men / Bisexuals / Heterosexuals **N/A**

- **Other:** e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion, Marriage and Civil Partnership **N/A**

2.4. To what extent are vulnerable groups more affected by this proposal compared to the population or workforce as a whole?

The proposal includes provisions relating to mainstream pupils and also pupils with Special Educational Needs or a disability. Consideration therefore needs to be given to vulnerable groups within mainstream provision and also children with SEN / disability.

2.5. To what extent do current procedures and working practices address the above issues and help to promote equality of opportunity?

Consultation process:

The consultation document was made available both as an online survey and a paper questionnaire and was launched on 29th June 2017 and concluded on 18th September 2017 following an extension after feedback from parents requesting additional time.

The consultation was supported by a comprehensive communications campaign which directly

targeted parents/carers and those in the wider community.

In total 538 residents participated in the consultation by completing the survey. 83% (449) said they were parents/carers of which 60% (271) said they were intending to apply for a 2018 school place.

The results of the consultation have broadly speaking uncovered considerable concern regarding the proposed policy changes. Whilst there were some elements of the proposals that have failed to attract support, others faced less opposition with the proposals allowing schools to run their own mini buses and to only provide transport for over-5s being supported. However, all of the proposals have highlighted issues that would require further thought, as summarised below.

Inconsistencies in approach

Firstly there was concern about the approach taken with the proposed changes. Respondents highlighted perceived inconsistencies and contradictions that the new policies created such as only providing transport to the nearest school. This proposal is not seen as being in line with council’s wider approach to school admissions, with many school’s still using catchment systems. Parents were concerned about applying for and accepting a place at a catchment school and then not being able to access school transport because it was not their nearest school. There was confusion about why the council is still using catchments if transport was no longer going to be provided to them.

Similarly, the proposal to only provide transport to children over the statutory school age of five was met with concern as parents claimed schools actively encourage pupils starting school following their fourth birthday with the school admissions team making provisions to allow this. Again, this highlighted to parents an inconsistent approach to children and schooling with accusations of a lack of joined up thinking within the council.

Impact on children and young people with disabilities or special educational needs

Secondly, respondents indicated that some of the proposals were unfair and targeted groups that were not able to adapt to these proposed changes. The Motability vehicle proposal drew criticism from service users i.e. parents with Motability vehicles. They explained that the proposal would severely impact their ability to maintain work as often appropriate schooling for their SEN children was much further afield than local mainstream schools, making the ‘school-run’ and reaching work on time unlikely to be viable. They felt this proposal unfairly penalised them and their families for having to attend specialist schooling outside of the local area.

These sentiments were echoed in the proposal to require a contribution towards the cost of transport from post-16 SEN students, with respondents saying the need to attend a specialist school/college outside of the local area is not the fault of the students and they should not be penalised for having to access schooling outside of a local mainstream school/college.

SEN families should be supported given the difficult circumstances they face and they should not be punished for having to travel out of area for their child’s education.

Safety and Sustainability

A final theme from the consultation findings was the notion of safety and sustainability. The proposal to provide travel passes for public transport to pupils aged 9-16 years old was met with strong opposition with regards to the lower limit being nine years old. Safeguarding was a massive issue for parents who were concerned about the idea of their young children mixing with the public and having to navigate their way to school unaccompanied.

Some also highlighted concerns about whether the current public transport provision could sustain an influx of school children or whether it was currently suitable for transporting children at school times. There was a concern this had not been factored into the proposals with many parents citing current poor provision in rural areas as a barrier to getting to school.

There were similar thoughts with the proposal to provide a contribution to schools to allow them to run their own min buses, but again concerns were raised about whether this was sustainable for schools given current budget pressures. Some saw this proposal as passing the burden on to schools and they did not want to see education budgets spent on transport, which was seen solely as a council responsibility.

Cost also became a factor with some suggesting the price could lead to some students not being able to access certain schools or curriculum because of cost.

Special Needs Action Panel Facilitated Meeting with Parents 22 September 2017

The meeting was also attended by Cllr Hegley and Cllr Dodwell.

The Head of Public Protection & Transport explained the proposals contained in the consultation and also confirmed that parents with motability vehicles (including age 16+) would not be required to transport their children to school. The following issues were raised during the course of the meeting:

- SEN children need a longer period of time to achieve their potential and it is unfair to be penalise them with transport costs post age 16.
- The wording of policies is crucial to ensure that they can be fully understood. The provision of flow charts would help.
- EHC Plans don't always mention transport needs. Some children don't have an EHC plan.
- Mainstream pupils are being transported to schools which are not their first choice of school. If a place subsequently becomes available shouldn't they transfer over to help save on travel costs
- Is the Council rigorous in checking fraudulent applications for assistance?
- Are sufficient steps taken to limit the costs of transporting children who have been expelled for bad behaviour from their original school?
- Council transport provision is not flexible enough to deal quickly with deteriorating conditions. The rules around manual handling and wheelchair passports are very rigid
- Why do further education colleges such as Barnfield challenge transport provisions every year?
- The Post 16 policy proposes to charge SEN children more for transport. It is discriminatory to charge disabled / SEN children more for their travel costs than mainstream children.
- The policy needs to recognise that transport can be shared with ex partners.
- Further consideration should be given to the location of special needs provision because this could help reduce transport costs in the longer term. There needs to be a clearer vision and a mapping of routes and provision
- Could some funding be redirected from transport to enable schools to support pupils in their local area and so avoid substantial travel costs?
- What role can personal budgets play?
- Can more be done to work with housing to ensure that homeless families / those in temporary accommodation are placed locally to help avoid increased transport costs.
- To what extent is the Local Plan considering the needs of SEN / Disability?

<p>Written submission - Motability;</p> <p>The proposals relating to disabled children and motability cars will limit the independence of disabled children, and foster more dependant, resource intensive, adults. It will restrict the ability of parents to work or study and pose risks to children’s safety in school car parks and adjacent streets.</p> <p>Only a child with severe mobility difficulties is awarded the higher mobility element of the DLA needed to contract hire with motability. The Council is therefore penalising the group with the highest mobility needs. The Council is not considering the variable income of parents or that some parents in receipt of the higher level of DLA may choose to finance a car in another way.</p> <p>The proposal does not consider the wider family circumstances in terms of other family members, work and study commitments. Special schools are often a distance from the family home. There are not the same options in relation to school clubs, pickups by other parents and childminders.</p> <p>The impact in terms of traffic congestion and safety has not been considered.</p> <p>Some parents may no longer be able to afford their Motability car but will have to pay a cancellation fee if they do not continue with the Motability contract.</p>
<p>2.6. Are there any gaps in data or consultation findings</p> <p>None identified</p>
<p>2.7. What action will be taken to obtain this information?</p> <p>Not applicable</p>

Stage 3 - Providing an overview of impacts and potential discrimination.

Stage 3 – Assessing Positive & Negative Impacts					
Analysis of Impacts	Impact?		Discrimination?		Summary of impacts and reasons
	(+ve)	(- ve)	YES	NO	
3.1 Age		√	√		<p>The proposal to provide travel passes for public transport to pupils aged 9-16 years old was met with strong opposition with regards to the lower limit being nine years old. Safeguarding was a massive issue for parents.</p> <p>Will the contribution for Post 16 SEND be set at a similar level to that of a bus pass for non-SEND students? The local authority should also consider that students with SEND may have to travel further to a suitable course</p>
3.2 Disability		√	√		<p>The proposals relating to disabled children and motability cars will limit</p>

					<p>the independence of disabled children, and foster more dependant resource intensive adults. The use of a motability car cannot be required. Not all families in receipt of DLA finance a car through motability. This proposal focuses on those with the highest mobility needs.</p> <p>In relation to residential schools SEN families should be supported given the difficult circumstances they face and should not be punished for having to travel out of area for their child's education</p>
3.3 Carers		√	√		<p>The Motability vehicle proposal drew criticism from service users i.e. parents with Motability vehicles. The proposal could severely impact their ability to maintain work as often appropriate schooling for their SEN children is much further afield than local mainstream schools, making the 'school-run' and reaching work on time unlikely to be viable.</p>
3.4 Gender Reassignment	-	-			
3.5 Pregnancy & Maternity	-	-			
3.6 Race		√			<p><i>"If transport is withdrawn for 4 year olds this would have a hugely detrimental impact on the early years education of Traveller children which could result in children missing the entire Reception year as parents would choose to keep their children at home until they could access the transport."</i></p>
3.7 Religion / Belief	-	-	-	-	
3.8 Sex	-	-	-	-	
3.9 Sexual Orientation	-	-	-	-	
3.10 Other e.g. Human Rights, Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion Marriage and Civil		√	-	-	<p>Success at school can be significantly increased according to what families do for under-5s in the home, and experience of pre-school education. Children's later achievement in language, reading and number</p>



Partnership					<p>ability improves if they attend good pre-school provision.</p> <p>In terms of concessionary passes and charging full cost it was felt that the price could lead to some students not being able to access certain schools or curriculum because of cost.</p>
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Stage 4 - Identifying mitigating actions that can be taken to address adverse impacts.

Stage 4 – Conclusions, Recommendations and Action Planning	
<p>4.1 What are the main conclusions and recommendations from the assessment?</p> <p>Further consideration should be given to the following proposals:</p> <ul style="list-style-type: none"> • Under 5’s – access to early education can be very important for disabled, Gypsy and Traveller and disadvantaged children • Motability – this can only be a request. It should be recognised that parents in receipt of DLA may finance transport in other ways • Post 16 SEND – these young people often have to travel further to access appropriate education and shouldn’t incur higher costs • Residential schools - should not be punished for having to travel out of area for their child’s education • Concessionary passes – increased cost may be an issue for disadvantaged families • Bus passes – consider whether the proposed age range should be increased above age 9 	
<p>4.2 What changes will be made to address or mitigate any adverse impacts that have been identified?</p> <p>Community Services and Children’s Services have agreed to set up a joint Project Board. The remit is to work together to find immediate and longer-term solutions to the ‘home school transport’ budget challenges.</p> <p>The Board will be attended by representatives from Children’s Services, Community Services, Adult Services (Transition), Housing Solutions, Community Intelligence and Kirsty Green from SNAP (Parents Representative for the Special Needs Action Panel). At some future stage other Partnerships may be considered such as Health.</p> <p>The Board will analyse the findings of the consultation and EIA.</p> <p>In addition, the Project Board will review future options such as Personal Transport Budgets (PTB’s) and Independent Travel Training (ITT) as a way of improving independence for young people. A number of authorities have already successfully implemented these in line with the national policy direction of increasing personalisation.</p>	



<p>The Project Board needs: -</p> <ul style="list-style-type: none"> • a more thorough understanding of how PTB's and ITT can be rolled out here in CBC • a framework for assessing the value of the PTB and ITT budgets and delivery to parents/carers. To consider a pilot • a communication strategy for specific engagement with parents/carers and other stakeholders which clearly explains the benefits • a costed model to demonstrate the potential benefits and any investment needed to enable them to be delivered more widely (such as invest to save) 			
<p>4.3 Are there any budgetary implications?</p> <p>Proposed efficiency savings may not be achievable in the current financial year</p>			
<p>4.4 Actions to be taken to mitigate against any adverse impacts:</p>			
Action	Lead Officer	Date	Priority
To be identified by Project Board			

Stage 5 - Checking that all the relevant issues and mitigating actions have been identified

<p>Stage 5 – Quality Assurance & Scrutiny: Checking that all the relevant issues have been identified</p>	
<p>5.1 What methods have been used to gain feedback on the main issues raised in the assessment?</p>	
<p>Step 1:</p>	
<p>Has the Corporate Policy Advisor (Equality & Diversity) reviewed this assessment and provided feedback? Yes/No</p>	
<p>Summary of CPA's comments:</p>	
<p>The Council's Equality Lead has been fully involved in the development of the EIA.</p>	
<p>Step 2:</p>	
<p>5.2 Feedback from Central Bedfordshire Equality Forum 8 June 2017</p> <p>Members of the Forum were provided with an early draft of the consultation documents. The Forum:</p> <p>NOTED</p> <p>the document entitled 'Travel Assistance Policies – Comparison of Current and Proposed Approaches'.</p>	



RESOLVED	
1	that, in the ‘Proposed Changes’ column opposite the reference to Working Tax Credit under ‘Current Approach’, a reference to Universal Credit be added;
2	that the Head of Public Protection and Transport establish and amend the document circulated at the meeting and a revised copy be attached as an appendix to the note of this meeting.

Stage 6 - Ensuring that the actual impact of proposals are monitored over time.

Stage 6 – Monitoring Future Impact	
6.1	How will implementation of the actions be monitored? To be agreed by the Project Board
6.2	What sort of data will be collected and how often will it be analysed? To be agreed by the Project Board
6.3	How often will the proposal be reviewed? To be agreed by the Project Board
6.4	Who will be responsible for this? To be agreed by the Project Board
6.5	How have the actions from this assessment been incorporated into the proposal? To be agreed by the Project Board

Stage 7 - Finalising the assessment.

Stage 7 – Accountability / Signing Off	
7.1	Has the lead Assistant Director/Head of Service been notified of the outcome of the assessment Name: _____ Date: _____
7.2	Has the Corporate Policy Adviser Equality & Diversity provided confirmation that the Assessment is complete? Date: _____