

CITY OF  
WOLVERHAMPTON  
COUNCIL

# Children, Young People and Families Scrutiny Panel

9 March 2020

**Time** 6.00 pm **Public Meeting?** YES **Type of meeting** Scrutiny  
**Venue** Committee Room 3 - 3rd Floor - Civic Centre

## Membership

**Chair** Cllr Rita Potter (Lab)  
**Vice-chair** Cllr Sohail Khan (Con)

### Labour

Cllr Rupinderjit Kaur  
Cllr Beverley Momenabadi  
Cllr Clare Simm  
Cllr Rashpal Kaur  
Cllr John Rowley  
Cllr Paul Sweet  
Cllr Jasbinder Dehar  
Cllr Paula Brookfield  
Cllr Dr Michael Hardacre

### Conservative

Cllr Udey Singh

Quorum for this meeting is four Voting Members.

## Information for the Public

If you have any queries about this meeting, please contact the Democratic Services team:

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**Tel/Email** Tel: 01902 551251 or [earl.piggott-smith@wolverhampton.gov.uk](mailto:earl.piggott-smith@wolverhampton.gov.uk)  
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# Agenda

## Part 1 – items open to the press and public

*Item No.*     *Title*

### MEETING BUSINESS ITEMS

- 1            **Apologies**
- 2            **Declarations of interest**

### PRE-DECISION SCRUTINY

- 3            [To give pre-decision scrutiny to the report  
**All Age Travel Assistance Policy** (Pages 3 - 118)  
[Adrian Leach, Head of Special Education Needs and Disability, to present report]



## Children, Young People and Families Scrutiny Panel

9 March 2020

<b>Report title</b>	All Age Travel Assistance Policy	
<b>Cabinet member with lead responsibility</b>	Councillor Dr Mike Hardacre Education	
<b>Wards affected</b>	All	
<b>Accountable director</b>	Emma Bennett, Director of Children's Services David Watts, Director of Adult Services	
<b>Originating service</b>	Special Educational Needs and Disability	
<b>Accountable employee(s)</b>	Adrian Leach	Head of Special Education Needs and Disability
	Tel	01902 553927
	Email	adrian.leach@wolverhampton.gov.uk
<b>Report to be/has been considered by</b>	Cabinet	18 March 2020

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### Recommendation for action:

The Scrutiny Panel is recommended to:

Note and comment on the All Age Travel Assistance Policy and implementation timeline.

### Recommendations for noting:

The Scrutiny Panel is asked to note:

This item is being considered as Children, Young People and Families Scrutiny Panel and will therefore not be available to call-in once a decision is made by the Executive.

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<b>CITY OF WOLVERHAMPTON COUNCIL</b>	<b>Cabinet</b> <b>18 March 2020</b>
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<b>Report title</b>	<b>All Age Travel Assistance Policy</b>	
<b>Decision designation</b>	AMBER	
<b>Cabinet member with lead responsibility</b>	Councillor Dr Michael Hardacre Education and Skills	
<b>Key decision</b>	Yes	
<b>In forward plan</b>	Yes	
<b>Wards affected</b>	All Wards	
<b>Accountable Director</b>	Emma Bennett, Director of Children's Services David Watts, Director of Adult Services	
<b>Originating service</b>	Special Educational Needs and Disability	
<b>Accountable employee</b>	Adrian Leach	Head of Special Education Needs and Disability
	Tel	01902 553927
	Email	adrian.leach@wolverhampton.gov.uk
<b>Report to be/has been considered by</b>	Children, Families and Young People Scrutiny Board	9 March 2020
	Joint Education and Children and Young People Leadership Team	20 February 2020
	Adults Leadership Team	18 February 2020
	City Environment Leadership Team	24 February 2020

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### Recommendations for decision:

The Cabinet is recommended to:

1. Approve the All Age Travel Assistance Policy (appendix 1).
2. Approve the phased implementation of the All Age Travel Assistance Policy as presented in section 6.

## 1.0 Purpose

- 1.1 The purpose of this report is to set out the background and context for the proposed All Age Travel Assistance Policy and supporting appendices, including the 12-week public consultation held between 2 September to 29 November 2019.
- 1.2 The City of Wolverhampton Council (the Council) is committed to supporting the independence of vulnerable children, young people and adults. The proposed Policy is intended to improve the travel assistance offer to better support the needs of people of our City and to promote independence.

## 2.0 Context

- 2.1 The All Age Travel Assistance Policy is framed by our statutory duties including:
  - To promote sustainable modes of transport in accordance with section 508A of the Education Act 1996
  - To make travel arrangements for children receiving early years' education under section 509A of the Education Act 1996
  - To publish an annual post 16 transport statement in accordance with the Education Act 1996
  - To publish general arrangements and policies for home to school transport for children of compulsory school age which should be easy to understand in accordance with the Education Act 1996
  - To publish information known as a "Local Offer" about support provision available for children and young persons in its area with special educational needs and disabilities under Section 30 Children and Families Act 2014
  - To provide support for adults with care and support needs in accordance with the Care Act 2014
  - To comply with statutory obligations of the Equality Act 2010 make reasonable adjustments for children, young persons and adults with disabilities, to have due regard to mechanisms for eliminating discrimination in accordance with the Public Sector Equality Duty
- 2.2 Currently the Council provides travel assistance to over 1,300 Children, Young People and Adults and the number of individuals that require travel assistance is increasing each year.
- 2.3 **The Council has a statutory duty to provide travel assistance to pupils with special educational needs and disabilities.** Currently, the Council provides transport for 831 pupils (2019/2020) with Special Educational Needs and Disabilities (SEND) and transports 51 adults (2019/2020) with care and support needs across the City enabling them to attend activities and inclusion within their community. As part of our current travel

offer we also provide 400 bus passes. The following policies are in place which determine if a pupil is eligible:

- Home to school transport Policy
- Post 16 transport statement

**2.4 For Adults, the Council has a legal duty to meet eligible needs for care and support as set out in the Care Act 2014 and the Care and Support Statutory Guidance.**

Travel assistance may be considered as an eligible need as part of the individual's care and support plan, although the Council does not have a separate legal duty to provide travel assistance. The legal duty for travel assistance only arises if it is to meet eligible need for care and support.

2.5 The Council recognises this duty and is committed to continuing to meet it. Although the Council is aware that transport provision is an important service for many of our citizens in the City, feedback from public engagement (please refer to appendix 3 which includes a summary of the outcome of consultation and appendix 2 which is the final evaluation of consultation) has suggested some people feel they would benefit from more choice in the way they travel.

### **3.0 Background**

3.1 A Corporate Transport Steering Group was established in 2017 which emphasised that there was a need to widen the current travel offer and to maximise independence. As part of this work IMPOWER was commissioned and found that the Council's travel offer did not reflect its ambition of promoting independence.

3.2 A white paper was produced by the Wolverhampton Challenge Board in December 2017 to influence and shape the City's future priorities around special educational needs and disability. This highlighted that young people with special educational needs and disabilities wanted to learn how to travel independently and affirmed they wanted to be supported to do so.

3.3 Following this work a Delivering Independent Travel Board was established of which an integral programme outcome was the development of a consistent policy for travel assistance which would support vulnerable children and adults with additional needs to develop travel skills (if appropriate to do so) and become empowered to live more independent lives.

3.4 The Council has identified the following aims for our new travel offer to achieve improved outcomes for the City of Wolverhampton:

- Support the most in need
- Promote principles of independence
- Provide the most cost-effective travel assistance
- Promote and encourage the use of sustainable travel

- 3.5 These aims underpin the work and engagement that was undertaken to develop the Draft All Age Travel Assistance Policy.
- 3.6 This resulted in a series of engagement sessions that were held from February to April 2019 to shape the development of the Draft All Age Travel Assistance Policy
- 3.7 The engagement sessions informed the Draft All Age Travel Assistance Policy. A 12-week public consultation then followed.

#### **4.0 Changes to our current policy position**

- 4.1 The Council already holds a policy for home to school transport and publishes a post 16 transport statement annually in line with our legal duties.
- 4.2 There is no current policy regarding travel assistance needs for adults through holistic individual assessment of needs which are carried out in line with our duties under the Care Act 2014.
- 4.3 When undertaking the development of the Draft All Age Travel Assistance Policy the Council consulted specifically on those areas where there were significant shifts from our current policy position, these are :

- **Proposal One** - City of Wolverhampton Council's current Home to School Travel Policy, Post 16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance Policy
- **Proposal Two** - The introduction of a personalised assessment process
- **Proposal Three** - The introduction of charges for young people of sixth form age
- **Proposal Four** - The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs
- **Proposal Five** - To provide transport only from a single address unless there are exceptional circumstances
- **Proposal Six** - To amend and clarify the application and appeals process for Home to School Travel Assistance
- **Proposal Seven** - To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances
- **Proposal Eight** - To reaffirm that where individuals are eligible for transport, pick-up points will be used unless there are exceptional circumstances
- **Proposal Nine** - The new policy aims to explain more clearly that parents are expected to accompany their children to school unless there are exceptional circumstances



## 5.0 Consultation

- 5.1 358 people participated in the public consultation through completion of a survey and attendance at 24 consultation focus groups.
- 5.2 A range of communication methods was used to promote the consultation including promotion in schools, colleges and day care centres, emails, posters, press releases, proposal summary document, accessible proposal summary document and social media outlets.
- 5.3 Parents / Carers of pupils and adults in receipt of travel assistance received direct correspondence about the consultation to inform them that they may be directly impacted by the outcome.
- 5.4 The outcome of consultation is summarised in appendix 3 and the final evaluation report can be found in appendix 2.
- 5.5 The Consultation Institute, an organisation independent of the Council, was commissioned to provide ongoing support and advice throughout the life time of the consultation. They have provided an extra layer of assurance ensuring that the consultation has been conducted fairly and robustly. The Consultation Institute conducted a mid-point review of the consultation which ascertained the extent to which the dialogue methods being used were successfully engaging the identified groups and individuals. Additionally, they reviewed the final evaluation report which established that the Consultation Institute were satisfied with the final output report.

## 6.0 All Age Travel Assistance Policy implementation

- 6.1 Subject to approval by Cabinet, the All Age Travel Assistance Policy will be implemented through a phased approach over 18 months. Please see the indicative timeline below:

Date	Activity
18 March 2020	All Age Travel Assistance Policy Cabinet sign off
April 2020	All Age Travel Assistance Policy assessment process go live date for new applicants requesting travel assistance for September 2020
May 2020	Publish post 16 Transport Policy Statement for young people of sixth form age
September 2020	All Age Travel Assistance Policy comes into effect for school age children
September 2021	Start of post 16 charging for young people entering year 12
September 2022	Start of post 16 charging for young people entering year 13

September 2023	Start of post 16 charging for young people entering year 14. Policy fully implemented.
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- 6.2 The Council is still required to ensure the policy is designed to align with corporate style which will be completed prior to the policy being published in April 2020.

## **7.0 Financial implications**

- 7.1 The Council is currently projecting to spend around £4.6 million on the provision of transport, escorted travel (travel assistants) and scheme administration for Education and Adult Social Care (£3.9 million of which is attributable for transport for Education).
- 7.2 Given the scope within this service, the Delivering Independent Travel Programme Board is aiming to increase efficiencies within the provision of travel assistance (e.g. by offering independent travel training and personal transport budgets). It is proposed that an All Age Travel Assistance Policy would allow for optimisation of these efficiencies whilst still supporting those most in need, promoting independence, providing cost effective and sustainable travel and meeting statutory requirements. This policy review has been conducted against a background of demographic led pressures impacting on costs, particularly within the education sector.
- 7.3 The proposed All Age Travel Assistance Policy has been founded on an overarching principle that the Council should support the development of independence where possible. The proposals within the policy support this overarching principle for example, the promotion of independent travel training.
- 7.4 At this stage it is difficult to estimate the financial impact of certain proposals, for example, the proposal that travel assistance will only be provided from a single address. The financial impact of this and similar proposals will need to be considered as part of any on-going route review, design and transport provision by the Council. It is anticipated that over time, efficiencies may be generated which impact positively, not only on the Council's finances, but also through improvements in well-being and reductions in social care dependencies. The impact of this will help to offset the financial impact of expected increases in projected demand over the medium term.

[RT/30012020/L]

## **8.0 Legal implications**

- 8.1 The Council has a duty under section 508A of the Education Act 1996 to promote sustainable modes of travel.
- 8.2 The Council also has a duty under Section 508B of the Education Act 1996 to make suitable home to school travel arrangements for eligible children.
- 8.3 Eligible children are defined within Schedule 35B Education Act 1996 as children unable to walk to school by reason of their special educational needs, disability, or

mobility problem (including temporary medical conditions); children unable to walk in safety to school because of the nature of the route, and children living outside 'statutory walking distance', which is two miles for children under eight and three miles for older children. Special rules about distance apply to children from low income families.

- 8.4 Eligible children only qualify for free transport to the nearest qualifying school. This is defined as the nearest publicly maintained school, with places available, that provides education appropriate to the age, ability and aptitude of the child, and any special educational needs that the child may have. For children with special educational needs, if a school is the only school named in an Educational, Health and Care (EHC) Plan, this means it is the nearest suitable school for school transport.
- 8.5 The Education Act 1996 empowers local authorities to make arrangements for children not covered by the statutory duty. This includes the power, under section 509A of the Education Act 1996, to make travel arrangements for children receiving early years' education otherwise than at school.
- 8.6 The Education Act 1996 requires local authorities to adopt and give effect to a transport policy statement dealing with young people of sixth-form age (section 509AA) specifying the arrangements for the provision of transport or otherwise that the authority consider it necessary to make for facilitating the attendance of persons of sixth form age at their place of education or training.
- 8.7 The Council has a duty under section 508F of the 1996 Act to make such arrangements for the provision of transport and otherwise as the authority consider necessary for facilitating the attendance of adults at their place of further or higher education, and the Council must prepare and publish a transport policy statement dealing with young adults aged 19 and over for whom an Education, Health and Care Plan is maintained (Section 508G).
- 8.8 The Education Act 1996 does not expressly require the preparation of a transport policy for children of compulsory school age. However, the statutory guidance says "local authorities must publish general arrangements and policies in respect of home to school transport for children of compulsory school age. This information should be clear, easy to understand and provide full information on the travel and transport arrangements. It should explain both statutory transport provision, and that provided on a discretionary basis. It should also set out clearly how parents can hold local authorities to account through their appeals processes".
- 8.9 The Council is under a duty to have regard to statutory guidance issued by the Department for Education when carrying out its duties in relation to home to school travel and transport, including when making and consulting on policy changes.
- 8.10 Section 30 Children and Families Act 2014, requires Local Authorities to publish information known as a "Local Offer" about support provision available for children and young persons in its area with special educational needs and disabilities. Such information must contain information pertaining to transport. It is acknowledged that if, following consultation, changes are made, the Council's Local Offer will require updating.

- 8.11 Section 149 Equality Act 2010 imposes the “Public Sector Equality Duty” upon CWC which requires that a public authority must, in the exercise of its functions, have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010 advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it, and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. Section 20 of the Equality Act 2010 imposes a duty to make reasonable adjustments for disabled persons in circumstances where the Equality Act 2010 applies.
- 8.12 A Local Government Ombudsman Report March 2017 “*Navigating School Transport Issues Focus Report: Learning Lessons From Complaints*” summarised the “emerging issues” regarding complaints with the application of and changes to Home to School Transport policies made by other Local Authorities as falling into three broad areas. Namely:
- i) changes to school transport policies not being undertaken fairly or transparently and confusing or insufficient information about when free transport will be provided;
  - ii) local authorities not applying the transport guidance properly when considering applications and conducting appeals. This includes those who are not of compulsory school ages (post 16 and under-five-year-olds); and
  - iii) failing to apply policies properly regarding children with Special Educational Needs issues, including those not of compulsory school age.
- 8.13 Moreover, any infringement of public law principles in developing, implementing or applying this policy may leave the City of Wolverhampton Council susceptible to subsequent legal challenge. The consultation on the All Age Travel Assistance Policy was undertaken and the policy developed and drafted with every endeavour of reflect upon this national learning, ensuring that all statutory stakeholders were consulted; and the consultation process was robust and meaningful.
- 8.14 Section 1 Care Act 2014 provides that local authorities have a duty to promote an individual’s well-being. Section 2(4)(e) of the Care Act 2014 provides that an individual’s “well-being” includes participation in work, training or education.

[AS/29012020/A]

## **9.0 Equalities implications**

- 9.1 This report has equal opportunities implications as the contents of the Draft All Age Travel Assistance Policy and consultation principles have direct relevance to the provision of travel assistance to educational establishments and social care venues. A detailed equalities analysis can be found in appendix 4.

- 9.2 All necessary normal consultation work must be undertaken before decisions regarding policy have been made and in a way that engages those with a legitimate interest in the potential outcome of this work. Doing this allows the Council to demonstrate that it had had “due regard” to the requirements of Section 149 of the Equality Act.
- 9.3 Throughout the development of this policy and at 2 key stages of this development there have been iterations of the equality analysis to allow officers and Councillors to reflect on the equalities implications of draft policy at these key stages so that amendments could be made to it. The equality analysis attached here is a detailed analysis of the policy as it is envisaged, following the conclusion of the period of formal consultation and includes responses to the equalities issues raised during that period. Considering the implications contained in the analysis and other papers will assist Councillor’s to demonstrate “due regard” to the Equality Act as described above.

## **10.0 Climate change and environmental implications**

- 10.1 This proposal will support greater independence for individuals using specialist transport and their families. This will be achieved through the Council offering alternative forms of assistance and increasing use of independent travel training.
- 10.2 It is anticipated that the new policy could lead to a reduction in use of specialist taxis mini-buses and coaches, as some individuals transition to the use of public transport. This would have a positive impact in terms of environment and congestion around schools. This should also support improved air quality. However, there could be an increase in use of own vehicles to transport children to school – which may offset any benefit from a reduction in specialist transport usage and would need to be monitored.
- 10.3 The new policy could also support an increase in the use of public transport, walking, cycling and other sustainable forms of transport. This will have a positive environmental impact.

## **11.0 Human resources implications**

- 11.1 There are no direct Human Resources implications arising from this project. However, the delivery of the policy may impact future structures and potential ways of working.

## **12.0 Corporate landlord implications**

- 12.1 There are no Corporate Landlord implications arising from this project.

## **13.0 Health and Wellbeing Implications**

- 13.1 Members of the SEND and Commissioning Partnership Board have been included in engagement conversations to help shape the travel offer.
- 13.2 Wolverhampton Clinical Commissioning Group (CCG) and relevant health providers have been also been included in engagement conversations to help shape the travel offer.

- 13.3 Greater independence can enable people to access a wider range of positive social activities.
- 13.4 Greater independence can open up more routes to further education, employment or leisure.

**14.0 Schedule of background papers**

04.06.2019 [Consultation on the All Age Travel Assistance Policy](#) Scrutiny Board  
10.07.2019 [Draft All Age Travel Assistance Policy](#) Cabinet

**15.0 Appendices[**

Appendix 1 – All Age Travel Assistance Policy  
Appendix 2 – Evaluation report of the All Age Travel Assistance Policy Consultation  
Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response  
Appendix 4 – All Age Travel Assistance Policy Equalities Analysis





# All Age Travel Assistance Policy

March 2020

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**Please note throughout this policy some words are underlined which means that this word is defined in the glossary. When clicking on the underlined word it automatically will direct to the glossary where a definition of the word can be found.**



## 1.0 Introduction

- 1.1 This policy sets out the [travel assistance](#) offer provided by the City of Wolverhampton Council (the Council) for children, young people and adults.
- 1.2 Travel Assistance is the way the Council helps people to get to a school or a day care centre. The policy refers to these places as [educational establishments](#) or [social care venues](#).
- 1.3 The purpose of this document is to clearly explain what the Council will and will not do to help people get to these places. What is described here is based on what the law says a Council must do.
- 1.4 The Council is determined to see that people in our City live independent and healthy lives, whilst supporting the most in need and providing the most sustainable and efficient travel-assistance option.
- 1.5 This policy aims to do this by supporting individuals to access educational establishments and social care venues based upon their individual needs.
- 1.6 This policy applies to the following:
  - Pre-school age children 0-4
  - Pupils of compulsory school age
  - Pupils aged 16-19
  - Adult Learners aged 19-25
  - Adults with care and support needs

## 2.0 Principles

### 2.a Promotion of independence

The Council wants to help people live independent lives and ensure they get the best travel assistance option to meet their individual needs.

### 2.b Safeguarding

The Council will make sure that all decisions made about travel assistance uphold our safeguarding duties to promote wellbeing and protect people from harm.

### 2.c Sustainable Travel

In line with the Council's climate commitment<sup>1</sup> this policy will seek to ensure the most sustainable mode of travel and transport<sup>2</sup> is used when providing travel assistance, which will cause the least impact on the environment.

## 3.0 Legal duties

- 3.1 This policy is written in accordance with our statutory duties including:

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<sup>1</sup> <https://www.wolverhampton.gov.uk/environment-and-climate/climate-change-and-sustainability>

<sup>2</sup> Section 508A of the Education Act places a general duty on local authorities to promote the use of sustainable travel and transport.

- To promote the use of sustainable travel and transport in accordance with section 508A of the Education Act 1996.<sup>3</sup>
- To make travel arrangements for children receiving early years' education under section 509A of the Education Act 1996.
- To make travel arrangements for [eligible children](#) to get to an educational establishment in accordance with section 508B of the Education Act 1996.
- To publish an annual post 16 transport statement in accordance with the Education Act 1996.
- To publish general arrangements and policies for home to school transport for children of [compulsory school age](#) which should be easy to understand in accordance with the Education Act 1996.
- To publish information known as a "[Local Offer](#)" about support provision available for children and young persons in its area with special educational needs and disabilities under Section 30 Children and Families Act 2014.<sup>4</sup>
- To provide support for adults with care and support needs in accordance with the Care act 2014.<sup>5</sup>

3.2 The policy is framed by the government's statutory guidance regarding home to school transport<sup>6</sup> and SEND Code Of Practice 0-25 years<sup>7</sup>.

## 4.0 Pre-compulsory school age children (0-4)

- 4.1 The Education Act 1996 does not place a legal duty on local authorities to provide transport for children below compulsory school age. The Council will not normally provide travel assistance for children before the start of the academic year in which they turn five.
- 4.2 The Council recognises that in exceptional circumstances children with an assessed special educational need may be eligible to access travel assistance. Exceptional circumstances are covered in section 19 of this policy.

## 5.0 Pupils of compulsory school age (5-16)

- 5.1 For [eligible pupils](#) of [compulsory school age](#) at the [nearest suitable school](#) travel assistance will be provided from 'reasonably near to home to reasonably near to the school' and will be provided for the journey to school in the morning and the return journey at the end of the school day. Travel assistance will not normally be provided at other times such as outside of normal school hours.
- 5.2 The Education Act 1996 states that [parents](#) are responsible for ensuring that their child attends school. For families accessing travel assistance under this policy, this includes the expectation that parent are responsible for ensuring their child gets to and from transport. This may mean accompanying them to and from a [pick-up point](#) if required. Reasonable consideration and adjustments for the parent's needs will be taken into account at the point of when the pupil receives an individual assessment.

<sup>3</sup> <http://www.legislation.gov.uk/ukpga/1996/56/contents>

<sup>4</sup> <http://www.legislation.gov.uk/ukpga/2014/6/contents/enacted>

<sup>5</sup> <http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted>

<sup>6</sup> <https://www.gov.uk/government/publications/home-to-school-travel-and-transport-guidance>

<sup>7</sup> <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>

- 5.3 Travel assistance will be provided for pupils using the most efficient use of Council resources and appropriate method that meets the pupil's needs. The assessment will look at the pupil's age, needs, ability and the journey they will be making to decide what type of travel assistance is most appropriate to meet their needs.
- 5.4 The Council will endeavour to ensure that the total journey time does not exceed 45 minutes each way for a pupil of primary school age or 75 minutes each way for a pupil of secondary school age as set out in the government's statutory home to school guidance<sup>8</sup>.
- 5.5 Pupils may qualify for free travel assistance based on the outcome of assessment if:
- they are [ordinarily a resident](#) of the City of Wolverhampton; **AND**
  - they are under 8 years and their [home address](#) is more than 2 miles from the [nearest suitable school](#); **OR**
  - they are aged 8-16 years and their home address is more than 3 miles from the nearest suitable school; **OR**
  - they are aged 8-11 years, eligible under the low-income criteria in section 5b and their home address is more than 2 miles from their nearest suitable school; **OR**
  - they been assessed as needing travel assistance due to eligibility arising from a special educational need or disability set out in section 6 of this policy.
- 5.6 **In addition to the above criteria additional considerations are made in line with statutory duties in the following circumstances:**

#### 5.6a Unsafe Walking Route

The Council has a duty to make transport arrangements for all children who cannot reasonably be expected to walk to the [nearest suitable school](#) because the nature of the route is considered unsafe to walk. The Council will assess if the route would be made safe if the pupil could be accompanied by a parent or an alternative safe walking route is available.

Pupils may qualify for free travel assistance based on the outcome of assessment if:

- they are [ordinarily a resident](#) of the City of Wolverhampton; **AND**
- they are aged 5-16 years and attending their [nearest suitable school](#); **AND**
- live within [walking distance](#) but all assessed available walking routes are deemed unsafe for a pupil taking into account their age and ability.

#### 5.6b Pupils from low-income families

Pupils from [low-income](#) families may qualify for free home to school travel assistance based on the outcome of assessment if:

- they are [ordinarily resident](#) of the City of Wolverhampton; **AND**
- they are eligible for Free School Meals (FSM); **AND**
- they are aged 5-11 years and their [home address](#) is more than 2 miles from the [nearest suitable school](#); **OR**
- aged 11-16 years and the school is between 2-6 miles away from their home address and there are not three or more suitable nearer schools; **OR**

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<sup>8</sup> <https://www.gov.uk/government/publications/home-to-school-travel-and-transport-guidance>

- aged 11-16 and live 2-15 miles away from their school where this is the nearest suitable school preferred on grounds of [religion or belief](#).

## 6.0 Children of compulsory school age with Special Educational Needs and/or Disabilities

- 6.1 Pupils with [special educational needs and/ or a disability](#) or [mobility problem](#) may qualify for free travel assistance based on the outcome of assessment if:
- they are [ordinarily a resident](#) of the City of Wolverhampton; **AND**
  - they are aged 5-16 years and attending the [nearest suitable school](#); **AND**
  - cannot reasonably be expected to walk to school because of their mobility issues or because of associated health and safety issues related to their special educational needs and/ or disability.<sup>9</sup>
- 6.2 Usual transport requirements (e.g. the statutory walking distances) should not be considered when assessing the transport needs of children eligible due to special education needs and/ or disability.
- 6.3 For a pupil with an [Education and Health Care \(EHC\) Plan](#) the parent or pupil's preferred school might be further away from their [home address](#) than the [nearest suitable school](#) that can meet their needs. In these cases, the Council can name the nearer school if it considers it to be appropriate for meeting the child or young person's needs.
- 6.4 If a residential school is named in the pupil's [\(EHC\) Plan](#) as being the most appropriate to meet needs, the pupil will be provided with a maximum of six return journeys between home and school per academic year.

## 7.0 Children and young people of compulsory school age with medical or mobility needs

- 7.1 Children and young people of [compulsory school age](#) who have [mobility problems/ medical conditions](#) that prevents them from walking may be eligible for travel assistance to help them get to their [educational establishment](#).
- 7.2 The Council will make a personalised assessment, based on supporting medical information, to decide the most appropriate method of travel assistance, as well as how long this should be provided for.

## 8.0 Post 16 travel assistance

- 8.1 The Education Act 1996 requires councils to publish an annual 'Transport policy Statement for young people of sixth form age' which sets out what travel assistance is available, from the Council and other bodies, to facilitate the attendance of young people of sixth form age receiving education or training at schools, FE colleges/institutions, 16-19 Academies, and certain other institutions maintained or funded by the Council. This statement is published annually and is available on the Council's website linked [here](#).
- 8.2 Councils are not required to provide any free or subsidised post 16 travel assistance and most young people do not receive or require travel support from the Council, unless the

<sup>9</sup> <https://www.gov.uk/government/publications/home-to-school-travel-and-transport-guidance>

circumstances are exceptional. Students should in the first instance apply to their school or college for bursary funding to help with their travel costs.

- 8.3 The Council can offer support to those students whose ability to attend or to complete a course may be affected by travel assistance not being arranged (please see eligibility criteria set out in section 8.7).
- 8.5 Continued provision of travel support will be focused on preparing students for adulthood and will consider building a capability to access employment, live independently and participate in society. Therefore, it may be assessed as appropriate for the Council to provide independent travel training for the young person for which the Council will request a charge.
- 8.6 All young people carrying on their education post 16 must reapply for travel assistance.
- 8.7 Post 16 pupils may qualify for travel assistance based on the outcome of assessment if:**
- they are [ordinarily a resident](#) of the City of Wolverhampton; **AND**
  - over [compulsory school age](#) but under 19; **OR**
  - continuing to attend a course which started before they were 19, until either it's completed, or they reach 25 years old (whichever is sooner); **AND**
  - attending a full time (a minimum 15 taught hours per week) course at the nearest suitable educational establishment; **AND**
  - it would not be reasonably practicable for them to attend an educational establishment if no arrangements were made; **AND**
  - they are able to demonstrate other arrangements have been considered or tried and why they are not suitable; **AND**
  - they are willing to pay a contribution towards transport.
- 8.8 If a post 16 pupil is eligible for travel assistance and it is assessed that they require a seat on a vehicle, they will be charged a contribution towards the cost of this. The level of contribution is set at £600 per academic year or £300 for students from [low income](#) families. This will not vary according to what type of [educational establishment](#) they are attending e.g. mainstream, special or specialist post-16 education provisions, independent schools or further education colleges or other suitable training establishments.
- 8.9 The child or young person's travel assistance needs will be reviewed annually on the basis that their needs may change as they get older.
- 8.10 Transport is normally only provided for the start and end of the educational establishment day, but adjustments may be made in exceptional circumstances.

## **9.0 Children with care and support needs**

- 9.1 Children and young people living with a foster carer are eligible for travel assistance under the criteria of this policy set out in sections 3-8. For details of other support available for foster carers please refer to the Allowances for Foster/Family & Friends (Connected Person) Carers' Allowance policy 2020.

## **10.0 Adult Learners aged 19-25**

- 10.1 The Council actively encourages young adults to participate in education and training to maximise their independence. However, it is expected that most adult learners will make their own travel arrangements and meet the cost of these arrangements.
- 10.2 In [exceptional circumstances](#) the Council may decide that it is necessary to provide travel assistance to students with an [\(EHC\) Plan](#), who are aged 19-25 years, when they begin a new course of education.
- 10.3 In considering whether it is necessary for the Council to make arrangements for the provision of travel assistance, the Council will make a decision based on:
- The student's age, ability, aptitudes and [special educational needs and/ or disabilities](#); **AND**
  - The nature of the route or alternative routes the applicant could reasonably be expected to take.
- 10.4 In deciding whether it is appropriate for the Council to provide travel assistance, the Council will also consider on an individual basis why the Council and not the individual or their family should be responsible for making travel arrangements. The Council's considerations will be based on whether an individual is:
- [ordinarily a resident](#) of the City of Wolverhampton; **AND**
  - continuing to attend a course which started before they were 19, until either it's completed, or they reach 25 years old (whichever is sooner); **AND**
  - attending a full time (a minimum 15 taught hours per week) course at the nearest suitable educational establishment; **AND**
  - it would not be reasonably practicable for them to attend an educational establishment if no arrangements were made; and they are able to demonstrate other arrangements have been considered or tried and why they are not suitable

Further consideration will be made if the individual is:

- in receipt of the higher rate mobility component of [Personal Independence Payments](#), this would be taken into account as a means of securing independent travel assistance. If there are any exceptional factors limiting its' use applicants will need to provide details of them
- in receipt of a 'Motability' vehicle of which they will directly benefit. If a decision has been made not to use the 'Motability' vehicle to enable the individual to attend their post 19 educational placement, the individual or their family will normally be expected to make their own appropriate alternative arrangements or provide details as to why that is not possible or reasonable.

## 11.0 Adults with care and support needs

- 11.1 The Council can support adults with care and support needs to travel to [social care venues](#).
- 11.2 The Council expects adults with support and care needs to manage their own travel requirements. Individuals who can travel to a community activity, either independently or with assistance from family, friends or support providers are encouraged to do so.



- 11.3 Travel assistance is only available for people who have been assessed as having eligible social care needs as set out in the Care Act 2014. Any need for travel assistance will be determined during an assessment of the individual's care and support needs carried out by a social care practitioner.
- 11.4 Part of an individual's assessment will identify their potential to be [independently travel trained](#) in order to travel to and from community activities and services.
- 11.5 If an individual is assessed as needing travel assistance, [pick-up points](#) may be used.
- 11.6 If an individual chooses to attend a community activity outside of their identified locality and a local service is available to meet their assessed need, the additional cost of any transport must be met by the individual.

## 12.0 Nearest suitable school

- 12.1 A nearest suitable school is the closest school at which the Council can make arrangements for a place which provides education that is suitable for the child's age, ability, and any special educational needs and disabilities they may have. In the following cases the Council is not responsible for the cost of travel assistance:
- The parents' or young person's preferred school or college might be further away from their home than the nearest school or college that can meet the child or young person's special educational need and/or disability. In such a case, the local authority can name the nearer school or college if it considers it to be appropriate for meeting the child or young person's special educational needs and/or disability. If the parents prefer the school or college that is further away, the local authority may agree to this but is able to ask the parents to provide some or all of the transport funding.<sup>10</sup>
  - Where the parent's preferred school is further away from their home than the nearest suitable school that can meet the child's special educational needs, the Council can name the nearer school if it considers it to be appropriate for meeting the child's special educational needs. Alternatively, they may agree to name the preferred school but can ask the parent to provide some or all of the transport funding
  - In deciding if to name the nearest or preferred school in the plan, the Council will consider whether transporting the child to the preferred school would be compatible with the efficient use of the Council's resources
  - To a school maintained by another Council where the admission to that school is as a result of parental preference, other than in cases where the Council could not secure a place at an alternative school regardless of whether this alternative school falls inside the City boundary
  - An individual who resides outside the City, but who receives education in one of the City's schools. In these cases, it is for the home Council to make appropriate arrangements
  - Where the destination is a work-experience placement or other off-site activity arranged by the school travel assistance will not be provided

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<sup>10</sup> Relevant legislation: Section 30 of the Children and Families Act 2014 and Schedule 2(14) of the SEND Regulations 2014 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/398815/SEND\\_Code\\_of\\_Practice\\_January\\_2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf)

## 13.0 Distance

- 13.1 The distances referred to in this policy are the statutory [walking distances](#) as defined under S444(5) of the Education Act 1996.
- 13.2 The distance for qualifying purposes is measured by the nearest available route. The route is not necessarily the shortest distance by road. It is measured by the shortest route along which an individual, accompanied as necessary, may walk with reasonable safety, as determined by the Council. The route measured may include footpaths, bridleways and other pathways as well as recognised roads. The Council will consider any relevant disabilities related issues as they are related to the journey for this measurement and mitigate any risks.
- 13.3 Distance is calculated through the Council's route-planning software.

## 14.0 Home address

- 14.1 An individual's home address is their regular residential address.
- 14.2 Transport will normally be from [pick-up points](#) near the individual's home, unless a home pick-up and drop off is essential due to the individual's needs.
- 14.3 If a pick-up from the home is assessed as appropriate, the address from which travel assistance is given is the home address at which the individual normally resides unless there are exceptional circumstances.

## 15.0 Acceptable behaviour

- 15.1 As a responsible employer, the City of Wolverhampton Council has a duty of care towards its staff and responsibility to ensure publicly funded assets are treated reasonably therefore people receiving travel assistance under this policy will be expected to adhere to the Council's acceptable behaviour process.
- 15.2 The Council recognises that it has a responsibility under the Equality Act 2010 to make reasonable adjustments and considerations for children, young people and adults with special educational needs or learning disabilities. These will be taken into consideration in the application of the acceptable behaviour process.

## 16.0 Vacant seats on contract routes

- 16.1 The Council will not normally provide or subsidise the journeys for those that are not eligible for travel assistance. The Council will make sure that vehicles are filled to capacity to ensure the efficient use of Council resources, however, any vacant seats may be used to carry other individuals that the Council considers requires assistance.
- 16.2 A seat may be given to another individual travelling to the same destination which the Council will charge for. It will be made clear that the arrangement could be terminated at a week's notice if the seat is required by an individual that is eligible for travel assistance.

## 17.0 Travel assistance assessment process



- 17.1 An application can be made using the City of Wolverhampton Travel Assistance application process for assessment by a suitably qualified professional to determine what travel assistance an individual is eligible for. The application process can be found on the Council's website and the travel assistance assessment process can be found in appendix 1.
- 17.2 Please note that during the application process, if the individual is of [compulsory school age](#), parents remain under their legal duty to ensure that they attend school regularly.

## 18.0 Travel assistance review process

- 18.1 The Council is responsible for deciding the most suitable travel assistance for an individual and will review this on a regular basis to ensure that it continues to meet the needs of the individual.
- 18.2 This review is part of the annual review for children with an [\(EHC\) Plan](#) and for pupil's with special educational needs every 12 months, the first review being 12 months after assistance starts.
- 18.3 Pupils without an EHC plan will be reviewed annually by a suitably qualified professional.
- 18.4 For adults with care and support needs, the ability of the individual to travel or access appropriate travel assistance will be reviewed by the relevant social care practitioners at annual reviews or earlier through reassessment of the individual's needs.

## 19.0 Exceptional Circumstances for children, young people and adults

- 19.1 The Council may choose to provide travel assistance for an individual in exceptional circumstances.
- 19.2 Exceptional circumstances are by definition exceptional and there is no 'fixed' set of exceptional circumstances in which the Council will provide travel assistance for an individual.
- 19.3 The Council will consider each case individually, taking into account the exceptional circumstances involved. The following situations (which are not intended to be exhaustive) may be considered exceptional:
- if an individual has more than one address, the Council will consider the family's circumstances and may provide travel assistance if the request is considered as reasonable
  - when school closure results in pupils being transferred to another school, children on the register of the closing school will be entitled to free of charge travel assistance to the receiving school if this would make them an [eligible child](#)
  - if a pupil is in year 10 or 11 undertaking examinations during and moves over 3 miles from the current school and wishes to remain there to avoid disruption to studies
  - child or adult safeguarding issues

- if the individual is in receipt of short-term respite care agreed with the Council at an alternative address
- when education may be severely disrupted for example, because of the effect of being taken into the care of the Council, or if a pupil's home life has been very severely disrupted or if not receiving travel assistance will prevent them from accessing education
- in exceptional cases where an additional activity is considered central to meeting the needs as stated in the individual's [EHC Plan](#), the Council may consider the practicality of extending travel provision to facilitate this.

19.4 Applications for travel assistance in exceptional circumstances must be supported by evidence and will be subject to regular review.

## 20.0 Types of Travel Assistance

20.1 The Council aims to promote the independence and well-being of all children, young people and adults through a range of travel options. The type of travel assistance an individual receives will be the most appropriate based on an individual assessment.

20.2 If an individual is assessed as being eligible the Council will decide between the following travel assistance options including:

- [bus pass](#)
- [independent travel training](#)
- [personal transport budget](#) (including mileage allowance)
- shared vehicle (including minibus, coach, taxi)
- individual taxi

20.3 The Council will also agree whether the individual requires extra space for equipment and/or luggage.

20.4 [Travel assistants/ escorts](#) and care during home to school transport will be considered as part of an individual's individual assessment. Travel assistants are issued with a photo ID badge, which must be worn at all times, to indicate they are undertaking this work for the City of Wolverhampton Council.

20.5 All travel assistance provided on behalf of the Council adheres to the Council's conditions of contract, and all staff undertaking travel assistance contract work will have been subject to criminal background checks and will undertake any relevant training.

### 20.6 Bus pass

20.61 A [bus pass](#) can be provided for use on public transport for individuals to travel to their [educational establishment](#) or [social care venue](#).

### 20.7 Independent travel training

20.71 Individuals that are eligible for travel assistance will be assessed for independent travel and will be expected to undertake travel training to help develop their confidence to travel independently, unless they are assessed as being unlikely to benefit from

such training. The process for independent travel training is outlined in appendix 2 'A young person's journey through independent travel training'.

- 20.72 Individual travel training will be a one-to-one flexible bespoke programme specifically designed to meet each individual's needs. This will be delivered by a qualified travel trainer following robust risk assessments. Support will be gradually phased out until the individual feels confident and capable enough to do the journey alone.
- 20.73 Once an individual has been signed off as an independent traveller, the Council will no longer provide another form of travel assistance and a [bus pass](#) may be provided.
- 20.74 If an individual is assessed as being appropriate for travel training and the offer is refused by the individual or parent, then no other form of travel assistance will be offered.
- 20.75 Where an individual has been assessed for travel training, but they are on a waiting list they will be provided with another form of travel assistance (e.g. seat on a vehicle) until travel training becomes available.

## **20.8 Personal Transport Budget (PTB)**

- 20.81 The Council will consider a Personal Transport Budget (PTB) including a mileage allowance when making an assessment on an individual for travel assistance if it is the most efficient use of Council resources.
- 20.82 For reimbursement of mileage costs for transportation, the route will be calculated based on the [shortest driving distance](#) based on the tax-free approved mileage allowance of two return journeys from home to destination.
- 20.83 To ensure consistency and fairness the measurement is calculated using the Council's route planning software.
- 20.84 Payment of PTB's will be dependent on the regular attendance of the individual at their place of education or care.

## **20.9 Provision of a place in a vehicle**

- 20.91 A place on a vehicle (either shared coach, minibus or taxi) will be provided for an individual following a personalised assessment process. This will usually be from a designated pick-up point near the individual's home, unless a home pick-up and drop off is required due to the individual's assessed needs.

## **21.0 Appeals concerning travel assistance to Educational Establishment**

- 21.1 If a [parent](#) is not satisfied with the Council's decision on the provision of travel assistance based on this policy they can [appeal](#). Parents can do this by following the two-stage appeal process which can be found on the Council's website. The Appeals process for travel assistance to an educational establishment is outlined in appendix 3.
- 21.2 During the appeals process no new travel assistance will be provided or in the case of existing arrangements, no change will be implemented. A parent will be responsible

for ensuring that they attend the educational establishment until the outcome of the appeal is determined.

### **21.3 Stage 1: Review by a Senior Officer**

- A parent has 20 working days<sup>11</sup> to make a request to appeal the decision<sup>12</sup>
- The letter of appeal should provide the reasons for challenging the Council's refusal of assistance or changes to proposed arrangements and include any supporting evidence
- Within 20 working days of receipt of a parent's appeal the appeal application is reviewed by a Senior Officer at the Council
- The original decision may be upheld or overturned
- Written notification of the decision will be sent out within 5 working days of the decision being made

### **21.4 Stage 2: Review by an independent appeals panel**

- A parent has 20 working days from receipt of the Council's stage 1 decision to make a request for a stage 2 appeal
- This appeal should provide the reasons for challenging the decision and any new supporting evidence if applicable
- Stage 2 appeals are heard by an appropriately trained independent panel which will be convened within 40 working days of receipt of the parents request for an appeal
- The parent will be invited to attend the hearing and will be informed of the final decision in writing within 5 working days.

### **21.5 Complaints to the Local Government Ombudsmen**

21.6 If an applicant considers that there is a failure to comply with procedural rules or if there are any other irregularities in the way the appeal is handled, they have a right to complain to the Local Government Ombudsman. The Local Government and Ombudsman Advice team can be contacted:

**By telephone:** 0845 602 1983

**Or in writing to:**

Local Government Ombudsman  
PO Box 4771  
Coventry  
CV4 0EH

21.7 If a parent considers the decision of the independent panel to be flawed on public law grounds, they may apply for a judicial review.

## **22.0 Complaints concerning travel assistance for adults receiving care and support**

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<sup>11</sup> As with the whole appeals process the timings are recommended and not compulsory. CWC will work to ensure appeals are dealt with sooner, particularly those which have a time pressure, whilst complex cases may take longer.

<sup>12</sup> Details of how to appeal can be found on the Council's website

- 22.1 Assessments regarding travel assistance for adults are undertaken as part of an individual's overall assessment of support needs carried out by a social care practitioner. There is no formal appeal process against the travel assistance assessment for Adults with care and support needs.
- 22.2 Where people are unsatisfied with the outcome of an individual assessment, they can make a complaint in accordance with the Council's complaints procedure.
- 22.3 If people remain dissatisfied after pursuing the Council's complaints procedure, they can appeal to the Local Government and Ombudsman:

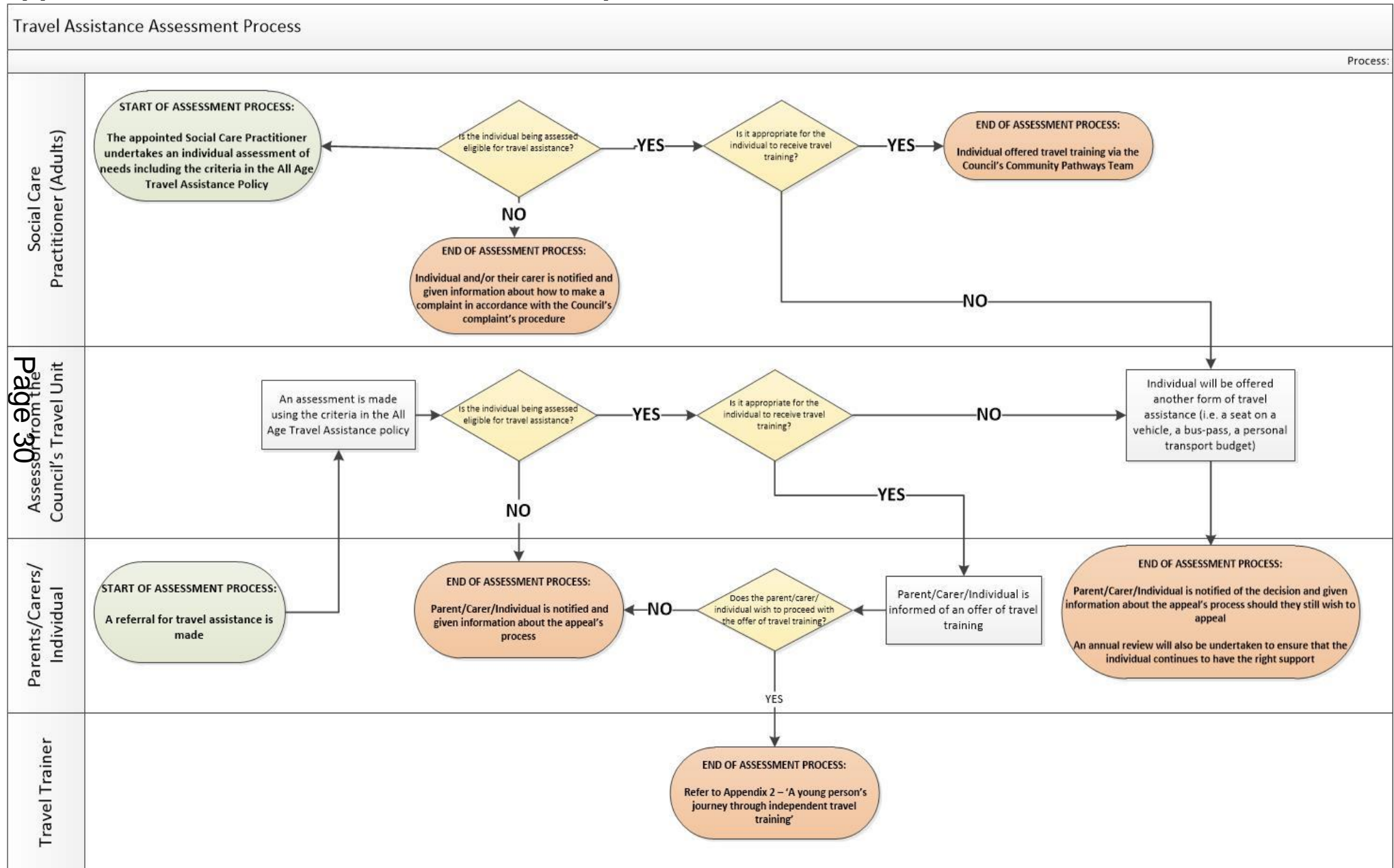
**By telephone:** 0845 602 1983

**Or write to:**

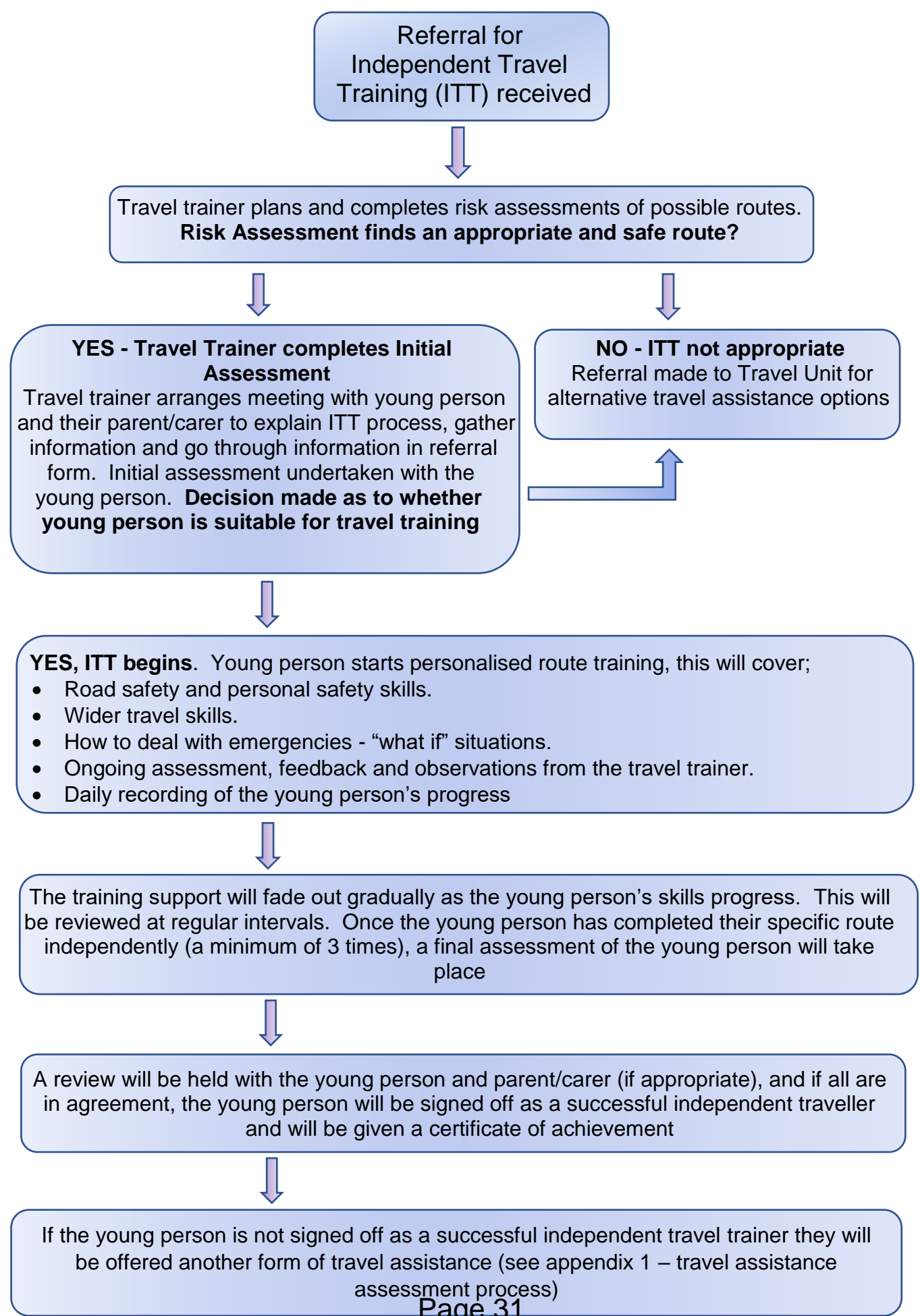
Local Government Ombudsman  
PO Box 4771  
Coventry  
CV4 0EH

- 22.4 If an individual considers the decision of the independent panel to be flawed on public law grounds, they may be able to apply for judicial review. The Council would respectfully remind those feeling aggrieved have the right to seek independent legal advice.

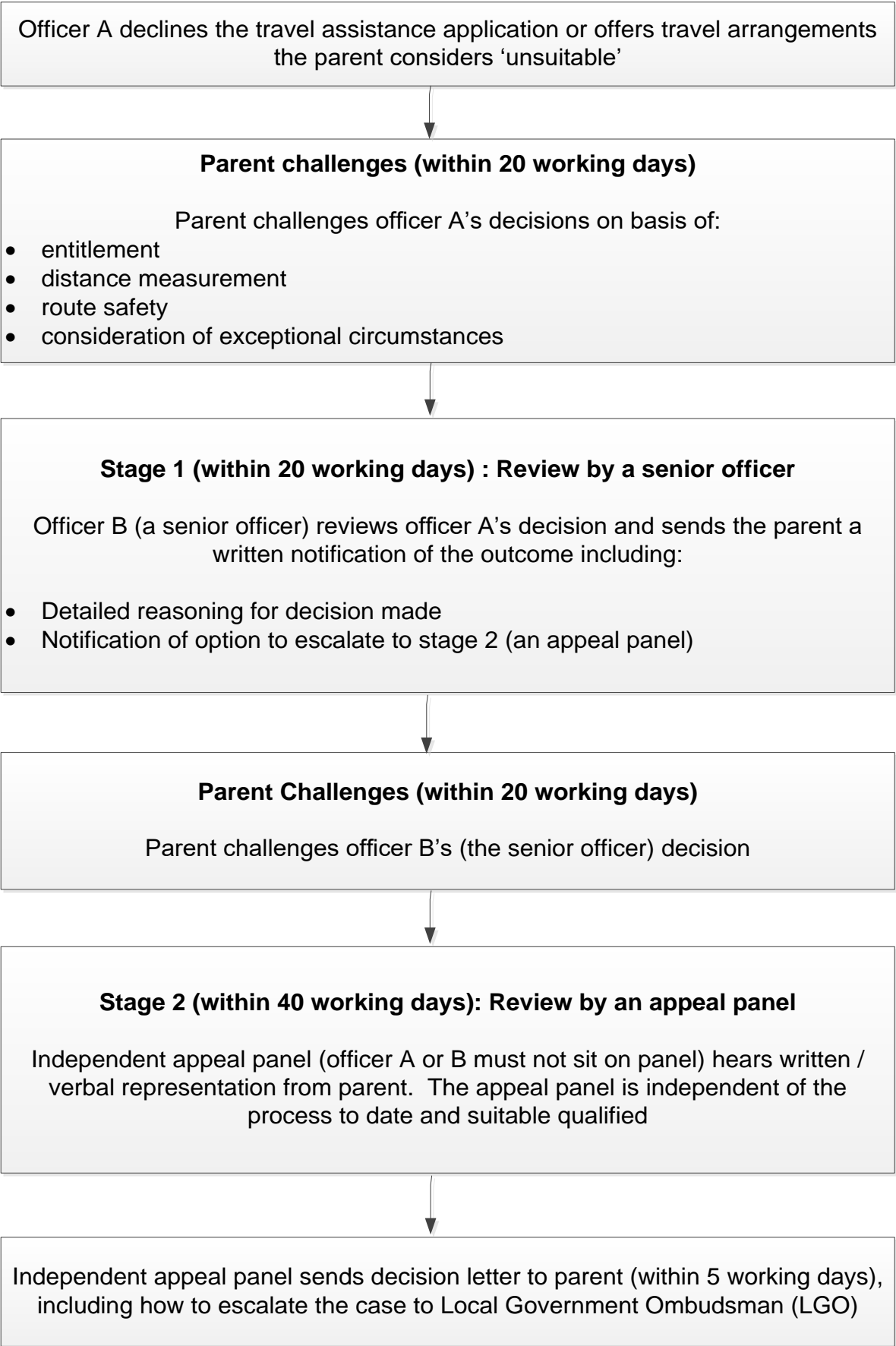
# Appendix 1: Travel assistance assessment process



# Appendix 2: A young person’s journey through Independent Travel Training



# Appendix 3: Appeals process for Travel Assistance to Educational Establishments





## Appendix 4 - Glossary

<b>Appeal</b>	An application to a senior decision maker to review and change an earlier decision about travel assistance or an application to an independent appeals panel for review
<b>Bus pass</b>	A card, ticket, or permit allowing the holder to travel by bus, for a particular period of time or within a particular area
<b>Compulsory school age</b>	<p>A child begins to be of compulsory school age on the start date of the term following their fifth birthday, or that day if their fifth birthday falls on the day term starts.</p> <p>A child ceases to be of compulsory school age on the last Friday in June in the academic year in which they reach the age of 16 or if they reach 16 after the last Friday in June but before the start of the new school year.</p>
<b>Education and Health Care Plan (EHC) Plan</b>	A document setting out the education, health and care needs of a child or young person and provisions required to meet those needs.
<b>Educational establishment</b>	<p>Educational establishments may include but not limited to:</p> <ul style="list-style-type: none"> <li>• maintained schools</li> <li>• voluntary controlled (VC)</li> <li>• voluntary aided (VA)</li> <li>• trusts</li> <li>• academies</li> <li>• free schools (studio schools and university technical colleges included)</li> <li>• Nursery</li> <li>• further education colleges</li> </ul>
<b>Eligible child</b>	Pupils who are unable to walk to school by reason of a disability, mobility difficulties or because of the nature of the route being unsafe, who live outside the walking distance or who are from a low-income family.
<b>Independent Travel Training</b>	Independent travel training helps young people with special educational needs learn how to travel to school or college by public transport. Independent travel training is also for adults who have additional needs who want to learn to travel more independently.
<b>Low-income Families</b>	Students or families who receive one of the qualifying benefits listed below are considered to have a low income if they are eligible for free school meals
<b>Medical Condition</b>	A permanent or temporary condition which requires medical assistance, and which prevents the individual or family making their own travel arrangements.
<b>Ordinarily a resident</b>	Somebody who reasonably would be considered to be normally living in the City of Wolverhampton.
<b>Personal Independence Payments (PIP)</b>	Personal Independence Payment (PIP) is a benefit that helps with extra costs of disability or long-term health conditions for people aged 16 and over.
<b>Parent</b>	A person who is the child's natural parent, adoptive parent or, is not the natural parent but has parental responsibility for the child, or who has care of the child.
<b>Pick-up point/ drop off</b>	<p>Where transport is allocated, excepting extraordinary circumstances, individuals are expected to make their own way to and from a safe pick-up and drop-off point at the beginning and end of their journey.</p> <p>Parents, guardians and carers are responsible for arranging accompaniment to and from the pick-up and drop-off point where they deem this necessary on safety grounds.</p>

<b>Religion or belief</b>	The main indication of what constitutes a 'religion' is that it must have a clear structure and belief system. 'Belief' is defined as 'a religious or philosophical belief' and equates to 'conviction'. It must be genuinely held and be more than an opinion or an idea. The burden of proof rests with any parent to showing that 'belief' is the real reason for their action/preference.
<b>Mobility Problem</b>	Motility problems are when an individual has difficulty in walking and moving. According to the 2010 Equality Act it is a disability that defined as affecting the person's mobility, manual dexterity, physical co-ordination or ability to lift, carry or otherwise move everyday objects.
<b>Shortest walking distance</b>	<p>The distance from the entrance to the child's home to the nearest recognised entrance of the school along which a child may walk, without trespass, with reasonable safety, accompanied by an adult as necessary. The route may include footpaths, bridleways, and other pathways as well as recognised roads.</p> <p>This is calculated using the Council's route planning software.</p>
<b>Shortest driving distance</b>	<p>The distance from the entrance to the child's home to the nearest recognised entrance of the school by car.</p> <p>This is calculated using the Council's route planning software.</p>
<b>Social Care Venue</b>	A place where people are supported regularly to access interests and activities in the city. These may be Council properties or community-based facilities.
<b>Special Educational Needs and Disabilities</b>	<p>A child or young person has special educational needs if they have a learning difficulty or disability which calls for special educational provision to be made for them. They have such a learning difficulty or disability if they;</p> <p>(a) have a significantly greater difficulty in learning than the majority of others of the same age, or</p> <p>(b) have a disability which prevents or hinders them from making use of facilities of a kind generally provided for others of the same age in mainstream schools or mainstream post-16 institutions.</p>
<b>Travel Assistance</b>	The way in which the Council will help an individual get to an educational establishment (schools, colleges etc.) or social care venue (day care centres) if an individual is assessed as needing this support.
<b>Travel Assistant (escort)</b>	A Travel Assistant helps the child / young person, aiding them to get on and off the vehicle, ensuring their safety and comfort and supporting them during the journey to and from school.
<b>Travel Unit</b>	The Council Team which organises travel assistance for those who are entitled under the Council's All Age Travel Assistance policy.
<b>Walking distance</b>	Defined, for the purposes of assessing home to educational establishment travel assistance, as either two miles for children of primary school age or three miles for children of secondary school age as measured by the nearest available walking route.
<b>Wolverhampton Local Offer</b>	A website created and maintained by the Council which provides information for children and young people with special educational needs and/ or disability and their parents or carers in a single place.

If you require assistance or need this information in large print, Braille, audio/CD or in another language, please call or email.  
**By email:** [travelunit@wolverhampton.gov.uk](mailto:travelunit@wolverhampton.gov.uk)  
**By phone:** 01902 554881

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## **All Age Travel Assistance Policy Consultation Evaluation Report**

December 2019

Prepared by **Results Communications Ltd** for and on behalf of  
City of Wolverhampton Council  
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## 1.0 Introduction

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Results Communications Ltd was commissioned to provide independent consultation and engagement services to City of Wolverhampton Council as it consulted on proposals to reshape the All Age Travel Assistance Policy. This report sets out the engagement and consultation activity, and the responses received.

### Background

#### The Children and Families Act 2014

In the Children and Families Act 2014 the government said it wants to make sure that all children and young disabled people and children and young people who have been told they have special educational needs, have good lives:

- They want to make sure children, young people and families get support early to keep them healthy
- They want young children and people be involved in making decisions in their lives
- They want children, young people and families to be able to find information easily that can support them
- They want children, young people and families to be supported to prepare for the future, having a job, choosing where to live and being part of their community.

*"Local authorities must consider how to meet each person's specific needs rather than simply considering what service they will fit into"*

- Care and Support Statutory Guidance Note, issued under the Care Act 2014

#### The Care Act 2014

The Care Act 2014 promotes wellbeing, and the recognition that everyone's needs are different and personal to them. It sets out that local authorities must consider how to meet each person's specific needs rather than simply considering what service they will fit into.

#### Wolverhampton Challenge Board White Paper

In 2017, City of Wolverhampton Council set how it would deliver the expectations of these two pieces of legislation in Wolverhampton Challenge Board's *Ordinary Life White Paper* (Appendix 1a).

It stated its vision of investing in a *future that changes lives*. The council affirmed its commitment to empowering young people with special education needs and disabilities and their families to take control over their lives and challenge the status quo.

*"Young people are part of the solution and we need to listen to their aspirations and understand their needs so we can plan and commission for a new generation"*

- Val Gibson, Cabinet Member for Children and Young People (2017)

In the Paper, findings from research with 102 young people aged 11 to 22 revealed that they want to be more



## 1.0 Introduction

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independent, want to work, want opportunities to meet new friends, and want ordinary life outcomes the same as their non-disabled peers.

### Changing Our Lives Real Talk

In 2018, Changing Our Lives, which supports the Wolverhampton Challenge Board, organised a Real Talk ([Appendix 1b](#)) event to further explore the section of the White Paper which dealt with the attitudes and expectations of what they can achieve from ordinary community life young people experience. At the event young people discussed transport, preparing for the future and designing an inclusive city.

### Shaping the Conversation

Feedback received from the 2017 and 2018 studies suggested some people feel they would benefit from more choice in the way they travel; this feedback shaped the conversation the City of Wolverhampton Council invited people to be part of early in 2019.

Led by the SEND Support Team, the council embarked on a series of workshops to find out what people thought about the current transport offer and how they thought the offer could be improved to better meet their needs. Through a series of workshops held around in the city, the council heard from under-16 pupils, older teenagers, adults using transport services, parents and carers, as well as professionals involved in supporting children, young people and adults who access this support.

Feedback from those workshops ([Appendix 1c](#)), along with that of the work by Wolverhampton Challenge Board and Changing Our Lives has helped City of Wolverhampton Council shape the proposals to develop the existing approach for providing Home to School Travel, Post 16 Travel and Adult Social Care Travel.

## 2.0 Consultation and Engagement

This section of the report sets out the details about the consultation, engagement activities, the proposals, any complaints or challenges to the consultation, any learnings from the consultation while still in progress., alternative proposals presented, and spoiled papers.

### The Consultation

The consultation launched on 2 September 2019 and closed on 29 November 2019. The consultation was digitally hosted on the council’s website, with hard copy versions of all documents made available on request, and during engagement workshops and meetings facilitated by third-party organisations.

The consultation information was still available at the time of writing on the [council’s website](#).

A suite of supporting information was also made available, both online and during engagement activity, including:

- Proposed All Age Travel Assistance Policy ([Appendix 2a](#))
- Consultation Proposals Summary ([Appendix 2b](#))
- Consultation Questionnaire (including Equality Analysis) ([Appendix 2c](#))
- Easy Read Questionnaire (including Equality Analysis) ([Appendix 2d](#)).

Further supporting information was available online, including the Department for Education Home to School Travel and Transport Guidance, the Care Act 2014, the SEND Code of Practice: 0 to 25 Years, City

of Wolverhampton Council Budget Setting, and current Travel policy/statement/protocol documents.

### Publicising the Consultation

The consultation was publicised via a number of earned and free channels including:

- direct mail to service users
- letters to parents (delivered to schools and distributed to pupils/parents)
- social media
- council magazine and newsletters
- council advertisement locations.

Third party organisations which had agreed to facilitate workshops or meetings with their members or service users were also provided with information to share via their own publicity channels to assist in the reach of the consultation.

A total of 20 social media posts reaching over 350,000 people have been sent through City of Wolverhampton Council’s social media channels including twitter and Wolverhampton Today.

These posts have been shared with Voice4parents, Wolverhampton Information and Advice Service, SENCOs and colleagues in health to share on their own channels to reach out to a wider audience.

Figure 1, below, provides an overview of the social media analysis for the Draft All Age Travels Assistance Policy Consultation.



Figure 1 Social Media Analysis for the Draft All Age Travel Assistance Policy

## 2.0 Consultation and Engagement

The consultation the subject of the three pieces of media coverage prior to the September launch, although a press release prepared in advance of the launch did not generate any fresh coverage.

The earlier coverage, in July 2019, resulted from the council's Cabinet considering papers about the proposed consultation, and the decision to consult being made. The links below are the three items of press coverage:

- 4 June 2019, [Express and Star \(Wolverhampton\)](#)
- 6 June 2019, [Birmingham Mail](#)
- 3 July, [Birmingham Mail](#)

A search for additional media coverage has proven unsuccessful and no coverage has been reported by the council's Communications Team.

### Proposals

City of Wolverhampton has consulted on nine proposals which set out how it thinks transport assistance could be provided in future. Each of the proposals are set out in the adjacent panel and were the core focus of each of the workshops.

Feedback to each of the proposals - In Scope Feedback - has been collated and is included at Section 3.0 Consultation and Engagement Responses. Feedback received which does not directly relate to any of the proposals - Out of Scope Feedback - was also received during the consultation. This has been collated separately, and is contained within the latter part of Section 3.0.

### The Consultation

#### Stakeholder Analysis

Stakeholder Analysis identified a core number of services users who either accessed transport assistance through Special Educational Needs and Disabilities eligibility for children, young people and adults, or because they are in receipt of a bus pass for travel to and from school. The consultation was a public consultation, so open to anyone interested in or likely to be affected by the proposals in the future.

Those in receipt of transport assistance were contacted directly and informed about the consultation, with an invitation to participate in a series of planned workshops. The Stakeholder Analysis also identified a number of other

#### Proposal One

City of Wolverhampton Council's current Home to School Travel policy, Post-16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance policy

#### Proposal Two

The introduction of a personalised assessment process

#### Proposal Three

The introduction of charges for young people of sixth form age

#### Proposal Four

The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs

#### Proposal Five

To provide transport only from a single address unless there are exceptional circumstances

#### Proposal Six

To amend and clarify the application and appeals process for Home to School Travel Assistance

#### Proposal Seven

To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances

#### Proposal Eight

To reaffirm that where individuals are eligible for transport, pick-up points will be used unless there are exceptional circumstances

#### Proposal Nine

The new policy aims to explain more clearly that parents are expected to accompany their children to school unless there are exceptional circumstances

## 2.0 Consultation and Engagement

stakeholders - professionals across the health, education, travel, and community/voluntary sectors - who may also wish to engage with the consultation, and opportunities to engage with the consultation via questionnaire and/or workshop participation were provided.

**Note:** The majority of people who took part in the consultation, both in terms of questionnaire responses and workshops, were services users or parents/carers of someone in receipt of travel assistance. Further, it was noted that the majority of those participating as a direct recipient of travel assistance, or on behalf of a recipient in a parent/carer capacity, were receiving support due to Special Educational Needs and Disabilities eligibility for either a child or adult.

### Engagement

#### External Engagement

City of Wolverhampton Council was keen to continue the conversations of early 2019, and scheduled a series of engagement workshops to allow more detailed discussions around each of the proposals. Workshops were scheduled across the city, to ensure events were as accessible as possible, in recognition of the demands on time. Venues were selected for their accessibility, ease of travel, capacity and footfall. Venues included the Civic Centre, the Art Gallery, community centres, libraries, schools/colleges and a Town Hall.

City of Wolverhampton Council commissioned Results Communications to facilitate the sessions delivered to the public and to professionals to ensure impartiality. The council's Adult Social Care service commissioned Changing Our Lives and the Alzheimer's Society to facilitate sessions for Adult Service users to ensure the consultation focus groups were accessible and tailored to their needs, with only Proposals One, Five, Seven and Eight discussed; this was a decision made by the respective organisations, based on their review of the proposals under consultation and their client group. Workshops were also held in seven schools across Wolverhampton; these were facilitated by the SEND Support Officer and supported by the Project Manager. They worked closely with the schools to tailor each session according to the needs of the pupils; this included using technology including applications or APPs and an interactive presentation to encourage pupils to engage and offer their views. All workshops facilitated by City of Wolverhampton Council or Results Communications

followed the same format, and included the provision of consultation material and questionnaires where appropriate (e.g. questionnaires were made available, and comments made during discussions captured by a scribe as primary approaches). Where focus groups were facilitated by third-party organisations, we are reliant on their data capture methods, which may have differed to the primary approaches. All data captured and provided has been included in the analysis and reporting.

#### Internal Engagement

The Draft All Age Travel Assistance Policy consultation has been presented and discussed in a range of internal and external meetings with various stakeholders. These meetings have been used as an opportunity to request partners to share the consultation more widely with their partners and interested groups or individuals in the community. The meetings are outlined below:

- Wolverhampton Ethnic Diversity Partnership Board
- School Governors Forum Autumn term update
- SENCO Forum
- SEND and Commissioning Partnership Board
- Adult Leadership Team
- Voice4parents Steering Group
- Workshops to Private Voluntary Independent nurseries and local authority nurseries.

#### Consultation Materials

A range of materials to publicise the consultation, provide information about the proposals and capture feedback to the proposals was produced by City of Wolverhampton Council:

Document	Number of copies printed
Proposals Summary All Age Travel Assistance Policy	200
Equal Opportunities Form	40
All Age Travel Assistance Policy Consultation Questionnaire	140
Draft All Age Travel Assistance Policy	55
A4 Poster	50
<b>Total</b>	<b>525</b>

## 2.0 Consultation and Engagement

Document	Number of copies printed
Easy Read Travel Assistance Survey	40
Total	525

No copies of the Easy Read version were completed, although it was noted that a small number were taken from workshops attended by parents/carers of people receiving travel assistance.

### Petitions

We are not aware of any petitions being prepared during the consultation and engagement activities, and have not been informed if any have been received by City of Wolverhampton Council.

### Campaigns

We are not aware of any campaigns being prepared during the consultation and engagement activities, and have not been informed if any campaign activity known about by City of Wolverhampton Council.

### Complaints or Concerns

We are not aware of any formal complaints about the consultation, and have not been made aware of any known about or received by City of Wolverhampton Council.

Some concerns were expressed by one person about participants not being listened to, that more talking was being done by the facilitator and that comments being made by participants were countered during the workshop they attended. No other comments of this nature were made or are known about.

The concerns raised were provided in comment on the workshop materials, and in an email to the Head of Service, who subsequently arranged a meeting with the originator of the comments and the facilitator, as well as other council employees present at the time. It is not for us to interpret the outcome of those discussions, however it is good practice to share feedback provided by participants at other workshops and events to gather views about suggestions, perceptions and explore similarity of views, anecdotal feedback and experience. It is by implementing this approach, that we have been able to further explore some experiences and ideas which

otherwise may not have been discussed.

Wolverhampton Information Advice and Guidance Service (IASS) identified some concerns within its questionnaire response against specific proposals. One concern was raised about the consistency of the Easy Read version of the questionnaire. We are aware this consultation has been the subject of Advice and Guidance by The Consultation Institute, but we are not privy to the guidance given in relation to consultation materials including information and questionnaires.

Of note, however, is that none of the responses to the consultation have been received in the Easy Read format.

### Learnings during the Consultation

#### Video

Part of the engagement workshops presentation included a presentation of a young wheelchair user who independently travels, and feedback discussed during the Mid Term Review was that some participants did not feel the video was a true representation of all of those who access travel support from the council, or their wide-ranging abilities or needs.

This was a similar view to the workshops earlier in the year, when an alternative video, of two mobile pupils independently travelling by bus and navigating bus stops, road crossings and other features typical of public transport was used.

It was decided at after the Mid-Term Review to remove the video from the presentation, although participants to the later workshops were sign-posted to the availability of videos showing independent travel and what it could look like, on the internet.

### Alternative Proposals

Discussions during workshops were animated, with the majority of those who attended keen to take part and be heard.

None of the proposals were challenged or countered with an alternative solution, although all were the subject of considered debate, with questions around how the proposal would be delivered, and suggestions offered about how it could be further improved to ensure a high quality service was committed to by the council, delivered by the council and its employees and contractors, and



## 2.0 Consultation and Engagement

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experienced by those using the service, and their families and carers.

### Spoiled Papers

There were no spoiled papers. Some questionnaire returns did not include responses to each proposal - this may be because they were not relevant to or of interest to the participant completing the form.

There were no illegible returns, and no returns were discounted or excluded due to lateness. To the contrary, Section 3 (page 12) acknowledges receipt of a late return from a consultee organisation which considered and agreed its response in December.

### Process

We understand this consultation has been the subject of advice and guidance from The Consultation Institute. This involvement assures public sector clients and communities that due process has been carried out, and that the requirements under the various Acts have been met.

The consultation has been designed to engage as many people as possible, both in terms of those currently receiving travel assistance from City of Wolverhampton Council, and those who are not yet but may need to.

This has been supported by an Equalities Impact Assessment, and a Stakeholder Analysis Assessment, which has informed the engagement of target audiences throughout the consultation, and influenced the shaping of the messaging through the range of channels utilised by the various council teams and departments involved in the consultation.

The consultation has been the subject of a comprehensive publicity campaign, which we have not been involved in but have witnessed, and supported by a robust events plan, which has included focus group events designed to further explore themes emerging during the *Shaping the Conversation* engagement early in 2019, and further themes, issues and concerns resulting from the bringing forward of these proposals.

### 3.0 Consultation and Engagement Responses

#### Demographics

This section of the report deals with the demographics of returned questionnaires:

The following charts set out the capacity in which respondents are providing feedback:

#### Preface Question One

Are you a:

- Child or young person currently receiving CWC provided home to school travel assistance
- An adult currently receiving CWC provided travel assistance
- A parent or carer of an individual currently receiving travel assistance
- An NHS employee
- A representative of a charity or community group in Wolverhampton
- A City of Wolverhampton Council employee
- An employee of a Wolverhampton School, academy or other educational establishment
- A Wolverhampton Councillor or MP
- Individual (see note below)
- Other (please state) - refer to Chart 1.2

The total responses to this question exceed the 134 returned questionnaires; this is because 12 people ticked more than one of the applicable options, including:

- An adult currently receiving CWC provided travel assistance and a parent or carer of an individual currently receiving travel assistance (two people)
- A City of Wolverhampton Council employee and an employee of a Wolverhampton School, academy or other educational establishment (one person)
- A child or young person currently receiving CWC provided home to school travel assistance and a parent or carer of an individual currently receiving travel assistance (three people)
- A parent or carer of an individual currently receiving travel assistance and an employee of a Wolverhampton School, academy or other educational establishment (two people)
- A City of Wolverhampton Council employee and Other (two people)
- A parent or carer of an individual currently receiving travel assistance and a City of Wolverhampton Council employee (two people).

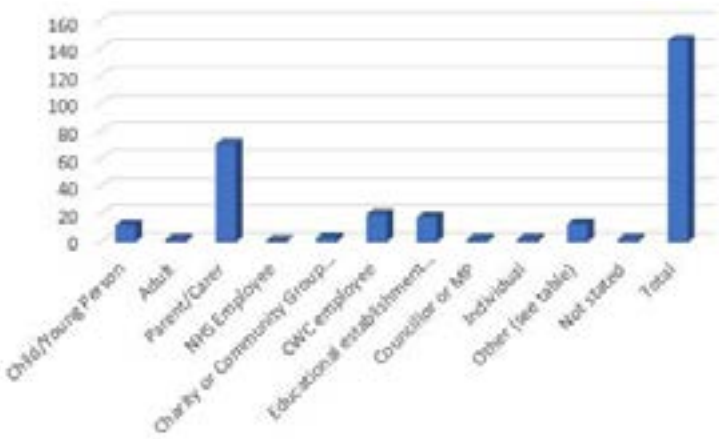


Chart 1.1 - Capacity in which respondent is completing the questionnaire

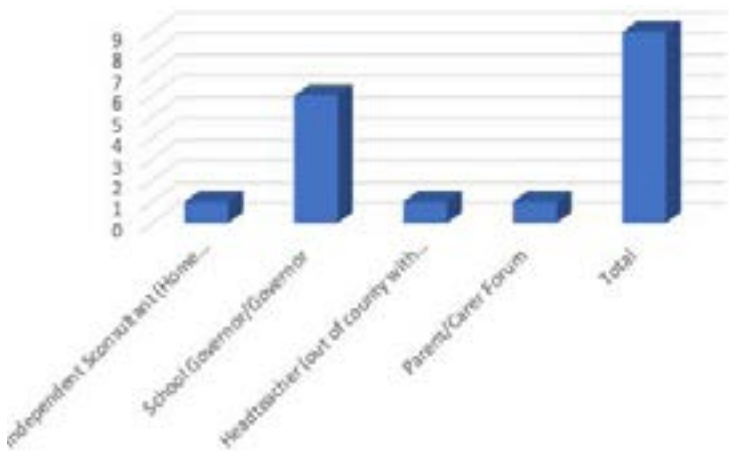


Chart 1.2 - Capacity in which respondent is completing the questionnaire

### 3.0 Consultation and Engagement Responses

Preface Question Two

If you currently receive travel assistance how is this provided:

- n/a
- Bus pass
- Minibus
- Taxi
- Coach
- Ring + Ride
- Direct Payment
- Other (please state) - see chart 1.4

This section of the demographics analysis sets out the range of travel assistance provided, and by how many respondents.

Note: Where a mode of transport is identified under other, this is noted verbatim as described by the respondent, and not categorised within the modes asked about in the questionnaire, although it is noted that where 'Big Yellow Bus', 'Local Authority Yellow Bus' and 'Yellow School Bus' are cited, it could be concluded that these are the 'Coach' referred to within the options provided in the question responses. They have been separated and are reported as provided by the respondents for clarity, and we make no assumptions as to what is meant by the information provided.

Multiple responses were cited by some people, as 'other' transport assistance including:

- Bus pass and mini bus (one person) under previous question
- Not Applicable, and 60+ bus pass under 'Other'
- Not Applicable, and Tail lift school bus under 'Other'
- Mini bus, and Yellow School Bus under 'Other'
- Bus pass, and None but looking under 'Other'

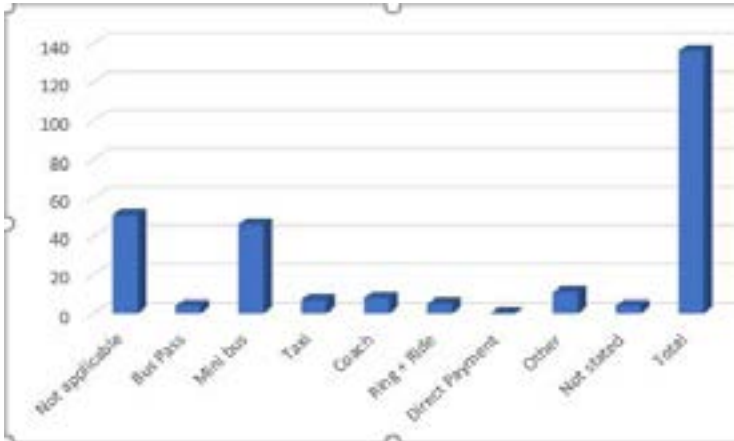


Chart 1.3 - Type of travel assistance received (and if applicable)

Travel Assistance Provided	Number of Respondents
Other:	
Bus pass and Minibus	1
60+ bus	1
Big yellow bus	2
Local Authority Yellow Bus	1
Mileage Allowance	1
School Transport	1
Taxi and Escort	1
Tail lift school bus	1
Yellow school bus	1
None but looking	1

Chart 1.4- Type of 'Other' travel assistance

Note: It is apparent from the responses that not everyone who receives transport assistance in the form of a bus pass or school transport, or who is responding on behalf of someone who does, regards this as 'transport assistance'.



### 3.0 Consultation and Engagement Responses

#### Consultation Questionnaire

This section of the report sets out the levels of engagement with the consultation, feedback to the questionnaire\*, both via the online platform and resulting from workshops, and other feedback received through alternative channels e.g. email, telephone call and letter.

A total of 142 questionnaires were returned. This comprised 117 questionnaires received via the online platform, and 25 received offline, via returns during workshops and by post. These numbers include full and partial completions - partial completions are where only those questions of interest/relevance to the participant were completed.

#### Partial and Incomplete Returns

All questionnaires with completed responses to questions and/or explanations to responses were considered in the analysis of feedback. Only one questionnaire was graded 'incomplete'; this is because only the questions about the capacity in which the person was completing the questionnaire, and any travel assistance being received

were answered.

Of the 133 completed questionnaires returned, the majority of respondents answered all of the questions; in this context all of the questionnaires returned, with the exception of the single incomplete questionnaire previously referenced, are classed as 'partial completions'.

Not everyone provided a response to the question, and/or an explanation to their responses; all information provided has nonetheless been included in the analysis of the responses.

#### Completed Questionnaires

If a 'completed questionnaire' is deemed to be one which has both a response to a question and an explanation about the response, along with commentary within both of the 'general comment sub-sections, none of the returns can be categorised as 'completed questionnaires' as all had at least one question, explanation or general comment area left blank. The table below sets out the number of responses to each proposal or proposal sub-question in returned questionnaires:

Proposal	Total Number of responses (of 134 returns)	Response with accompanying Explanation	Explanation with no Response (where no box ticked)
Proposal One (1.1)	132	78	
Proposal Two (2.1)	131	65	
Proposal Two (2.2)	132	79	1
Proposal Two (2.3)	132	84	1
Proposal Two (2.4)	132	60	
Proposal Three (3.1)	130	82	2
Proposal Three (3.2)	132	76	
Proposal Four (4.1)	133	69	
Proposal Five (5.1)	132	76	
Proposal Six (6.1)	130	38	
Proposal Six (6.2)	132	80	
Proposal Seven (7.1)	131	74	1
Proposal Eight 8.1)	133	72	
Proposal Nine (9.1)	133	72	
General - Considerations	82	n/a	n/a
General - Suggestions/ Comments	63	n/a	n/a

### 3.0 Consultation and Engagement Responses

Audience	Facilitator	Number of Sessions Held	Number of Attendees
Professionals	Results Communications	3	29
Service Users Families	Results Communications	8	69
Adult Service Users	Changing Our Lives & The Alzheimer’s Society	6	51
Pupils	SEND Support Officer	7	67
Total		24	216

Figure 2 Table showing completed engagement sessions, the audience and number of attendees during the consultation

#### Engagement Workshops

A total of 24 engagement workshops have been held across the city targeted at various stakeholders including pupils, parents and carers, adult service users and professionals. A total of 216 people have attended these sessions.

All workshops facilitated by Results Communications provided attendees with hard-copy formats of the consultation materials and questionnaire. The Easy Read version of the document was made available, but no copies were completed.

Note: Some people attended the workshop, having already completed the questionnaire. It is not known if any subsequently completed a second copy, or provided a partially-completed questionnaire.

It should also be noted that not everyone who attended a workshop completed a questionnaire at all.

#### Workshops with School Councils

Workshops were held in seven special schools across the Wolverhampton, facilitated by the SEND Support Officer and supported by the Project Manager - a total of seven workshops. Pupils aged between six and 19 took part in the workshops, with input from teachers and/or support staff during the sessions. Sessions were tailored to suit the needs and abilities of those participating, but all were asked about each of the nine proposals. Findings were prepared by the SEND Support Officer, taking data from apps used during the workshops, or repurposing sheets used during the discussions into a report.

#### Workshops by Changing Our Lives

Changing Our Lives held two workshops, attended by a total of 33 people. Four of the proposals were discussed

as these were regarded as being of most relevance to the participants.

#### Workshops by Alzheimer’s Society

Alzheimer’s Society held four workshops, with only those proposals relevant to or suitable for the audience of people with a diagnosis of dementia and their carers. A total of 20 people attended. The findings of those workshops were provided to City of Wolverhampton Council in a report.

#### Responses received by email

A total of 10 returns were received via email.

The consultation materials provided an email address through which consultees could provide their feedback. This email address - SENDTeam@wolverhampton.gov.uk - was administered by the council’s SEND Support Officer directly involved with the consultation and was used to send eight emails containing comment in either an individual or organisational capacity.

Some of the emails received were not sent to the SENDTeam@ email account. One of the emails received into the SENDTeam@ account was also directly sent to named individuals, including the SEND Support Officer directly involved with the consultation, and three other recipients (it is not known if these three are internal or external to City of Wolverhampton Council).

A second email received into the SENDTeam@ account was also directly sent to the SEND Support Officer directly involved with the consultation, and one other recipient (it is not known if this person is internal or external to City of Wolverhampton Council).

A third email, containing feedback to the consultation was sent directly to named individuals, rather than to the @

## 3.0 Consultation and Engagement Responses

SENDTeam email account, and was sent to two primary named individuals internal to City of Wolverhampton Council, copying in two additional internal colleagues, including the SEND Support Officer involved with the consultation. This email was then forwarded by one of the primary recipients, to a fifth internal colleague, who then forwarded it to the second primary recipient and the SEND Support Officer involved with the consultation (and who was named on the original email as a secondary recipient copied in).

All of the emails received comprised:

- One bespoke response by a stakeholder organisation (transport) identifying opportunities for collaboration and support, as well as requesting amendments to the draft policy (Appendix 3a) accompanied by an email note (Appendix 3a1)
- An emailed note from a second stakeholder (public health), and requesting the opportunity to work with the council and public transport to improve the public transport offer (Appendix 3b)
- A completed questionnaire by a third stakeholder (information, advice and support) (Appendix 3c). It is not clear who completed the form, or who emailed the questionnaire return.

The remaining emailed responses were from parents or carers of people who receive transport assistance from City of Wolverhampton Council, comprising:

- An email from a parent expressing concerns about Ring + Ride and a safeguarding referral, and a lack of response or action to complaints made to both Ring + Ride and City of Wolverhampton Council (Appendix 3d)
- An email from a parent expressing concerns about Ring + Ride (Appendix 3e)
- An email from a parent supporting the proposals (Appendix 3f)
- An email from a parent expressing concerns about the proposals. From the comments made, it appears this respondent has not fully understood or appreciated the proposals, and that it is not proposed to remove transport assistance (Appendix 3g)
- An email from a former teacher (SEND) and senior lecturer (Special Education) expressing support for the proposals, and also asking questions about the assessment, application and travel training processes (Appendix 3h)
- An email from a parent supporting for the benefits of the All Age Travel Assistance policy (Appendix 3i).

The tenth email - correspondence from the Ethnic Minority Council, which considered the proposals during a meeting in December 2019, was received late but not discounted or excluded. These comments are included within each proposal sub-section within Section 4.

### Responses received by post

A total of five returns were received by post. All were a printed hard copy version of the questionnaire. Two of these returns had completed the Equal Opportunities Monitoring Form.

*Note: It is not possible to identify if these returns were from a workshop participant, and if so which of these returns are participants who may have already completed a separate Equal Opportunities Form\*\* during a workshop.*

*Note: It is not possible to identify if any of these participants to the consultation also completed a questionnaire in isolation to providing the email correspondence.*

### Telephone Enquiries and/or Responses

A total of ten calls were received during the consultation. None were from people wishing to provide a verbal response to the consultation proposals. All were from people enquiring about workshops being held, wishing to register for a workshop, or confirming details about a workshop.

### Recommendations

1. Refer to Appendix 3a and review the comments by Transport for West Midlands and action as is deemed appropriate.

2. Refer to Appendix 3b and review the comments by Public Health, City of Wolverhampton Council and action as is deemed appropriate.

3. Refer to Appendix 3c and review the comments by Wolverhampton Information Advice and Support Service and action as is deemed appropriate. *We would advise that appropriate specialist advice is sought when considering this response.*

4. It was noted that not all email responses are tagged with 'Flag' and 'Flag Status'. Refer to Appendices 3d

## 3.0 Consultation and Engagement Responses

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to 3i and acknowledge receipt and feed back, respond where and however appropriate and consider if follow-up dialogue is required. Action as is deemed appropriate.

5. Consider the comments provided by the Ethnic Minority Council and respond, acknowledging receipt and feed back, responding where and however appropriate and consider if follow-up dialogue is required. Action as is deemed appropriate.

## 4.0 Analysis of Consultation and Engagement Responses

This section of the report sets out the feedback received through all channels.

### Feedback to the Consultation

The first part of this section deals with Responses to Proposals. This is set out as Quantitative and Qualitative data in Appendix 4a. **It is recommended to read all of the comments provided within Appendix 4a in relation to each proposal.**

The second part of the section deals with Out of Scope Feedback - comments and views which are not directly responding to a proposal, but which are material to the service currently being provided, and/or how it is or could be shaped.

Note: The total number of responses included all responses provided to each specific Proposal, or sub-question within the Proposal, from all questionnaires, and where provided, from third-party workshops where participants indicated their responses.

### Analysis of Responses to Proposals

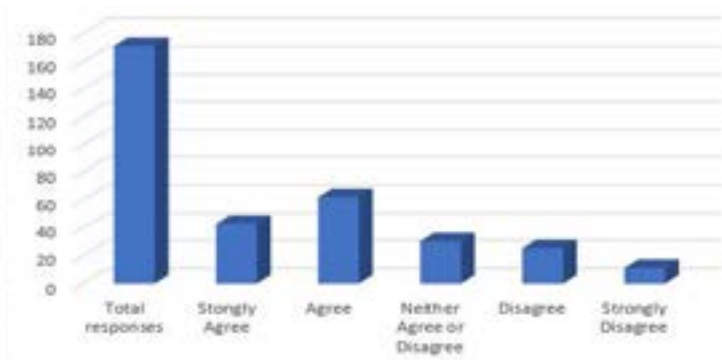
This section deals with the explanations consultees provided as part of their responses to individual proposals. These comments have not been themed or grouped according to discussion point, but have been retained as exported from the feedback file provided.

### Proposal One

City of Wolverhampton Council's current Home to School Travel policy, Post-16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance policy.

1.1 One policy that outlines the travel assistance provision available for all ages would be better than separate policies for each age range.

### Overview



**The majority of people were in favour of this proposal, with 105 Strongly Agreeing or Agreeing, 30 Neither Agreeing or Disagreeing, and 36 Disagreeing or Strongly Disagreeing.**

There were mixed views about this proposal, with some people noting that they did not feel this was a matter for a public consultation, and that a consistently high quality provision was more important than being asked how policy documents should be structured.

Comments were also made about the draft policy, with people stating that it was confusing and contained information some did not regard as relevant. Some people used this explanation opportunity to provide comment on specific areas within the draft policy; these comments have been retained as provided.

Some people expressed concern that a single policy document would be a 'big mess' and that it would lead to a 'one size fits all' approach to providing travel assistance to those who are eligible. There were concerns over how pupils with special educational needs and disabilities who attend mainstream schools would be addressed within the policy, and that the single policy document would only benefit younger people.

Focus group discussions drew out similar comments to those provided in questionnaire responses, with participants making a number of suggestions about

## 4.0 Analysis of Consultation and Engagement Responses

what the single policy document could look like to help achieve a consistent approach and experience:

policy. We would recommend this panel also includes the Wolverhampton Challenge Board.

- Single policy document must be clearly sign-posted to ensure people can see which sections apply to their circumstances
- Policy must be in Plain English, and available in alternative language, Easy Read, Braille and Audio formats. A version could also be made available for children and young people
- Policy should be clear and transparent
- Policy should clearly set out the responsibilities of the council, travel assistance (where applicable) and the parent/carer. Policy should also set out how responsibility shift as a child or young person enters adulthood
- Policy document should contain information and guidance, or signposting to such resources about legal, advocacy, funding (grants and bursaries etc.), appeals process (including timing, what to expect, etc.)
- Policy should be shared with all agencies involved in the delivery of the policy
- Policy should be shared with parents/carers when adopted by the council, and parents/carers should be sign-posted to the relevant section of the policy when assessments are being carried out, or decisions have been made about the eligibility of the person being assessed for travel assistance

### Recommendations:

- Be clear that a single policy does not remove the person-centred approach to providing the care and support an individual needs
- Ensure the proposed policy is clearly sign-posting readers to specific sections, or guidance, community resources and legal information
- Policy document should set out the current, relevant legislation about compulsory school ages and how they affect or are affected by the travel offer
- Consider how the policy can be aligned with services and support the individual is receiving to help those receiving support understand how the two are linked
- The policy should form part of the discussions during assessments so parents/carers and those being assessed understand how the support being provided is linked to the policy in place, and how any care plans are aligned to the policy provision
- Consider how often and when the new policy will be reviewed; consider the creation of a review panel of parents/carers, which can feed into a council mechanism for delivering change within any new



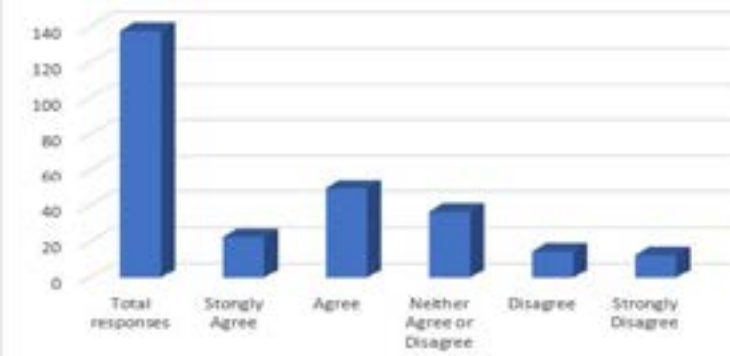
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Two

The introduction of a personalised assessment process.

2.1 The proposed policy is clear about how a personalised assessment would be carried out.

#### Overview



**The majority of people were in favour of this proposal, with 73 Strongly Agreeing or Agreeing, 15 Neither Agreeing or Disagreeing, and 28 Disagreeing or Strongly Disagreeing.**

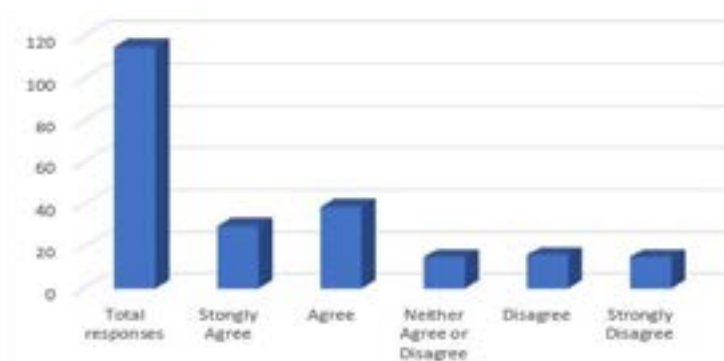
Views on this proposal were varied, with mixed opinions about the clarity provided in the draft policy. Generally, discussions during focus groups were that personalised assessments are a good idea as long as the right person does them. People were clear that a 'one size fits all' approach was not suitable and that a personalised assessment would ensure this was avoided.

People commented that they did not feel qualified to comment on the clarity of the proposed policy, that it's 'not especially clear, but clearer than more other council policies', and that 'it could be clearer'. People responding via both questionnaire, and commenting during focus groups felt more clarity was needed around what the assessment process would look like, how long it would take, when decisions would be made known to families and carers, who would be doing the assessments, and what a 'relevant professional' means.

Concerns were expressed that the assessment appeared to be more focussed on age rather than ability. Questions were asked about how changes in circumstances would be dealt with, if these changes occurred after a decision had been made, and who was making the decisions following assessment. People were concerned that the policy under consultation does not include criteria for the assessment and that this could create loopholes which the council could use to deny travel assistance.

2.2 Individuals eligible for travel assistance should receive independent travel training, to help promote their independence, unless there is a good reason why this would not be appropriate.

#### Overview



**The majority of people were in favour of this proposal, with 69 Strongly Agreeing or Agreeing, 15 Neither Agreeing or Disagreeing, and 31 Disagreeing or Strongly Disagreeing.**

Generally, the idea of independent travel training was welcomed as long as it is discussed by all involved in the provision of care and support of the individual being assessed, and that it was only introduced if appropriate and after the individual had successfully completed training.

People generally accepted that travel training was good for promoting independence, but stated that it was not going to be appropriate for all - regardless of an individual's desire to be travel trained.

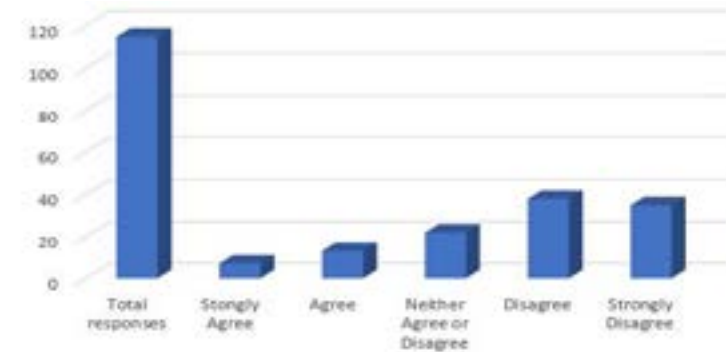
People were concerned about public transport and the risk/safeguarding issues raised, as well as how people would deal with uncertainties of late transport, changes to timetables, etc. Questions were asked about how the travel training would be delivered (how many sessions, what happens if they don't pass a section of training, and who would be delivering the training). Discussions in focus groups were focused on this area, with some people voicing their concerns about the specialist nature of some conditions, such as blindness, hearing impairment, etc., and how these would be addressed within the training packages.

People were concerned about the phrase 'eligible', stating they have had struggles with having people assessed and decision-makers agreeing they are eligible for support, only to have it overturned on appeal.

## 4.0 Analysis of Consultation and Engagement Responses

2.3 If, following a personalised assessment, an individual is assessed as able to benefit from a bespoke programme of travel training and then refuses to participate in the programme, no further offer of travel assistance will be provided.

### Overview



The majority of people disagreed with this proposal, with 20 Strongly Agreeing or Agreeing, 22 Neither Agreeing or Disagreeing, and 73 Disagreeing or Strongly Disagreeing.

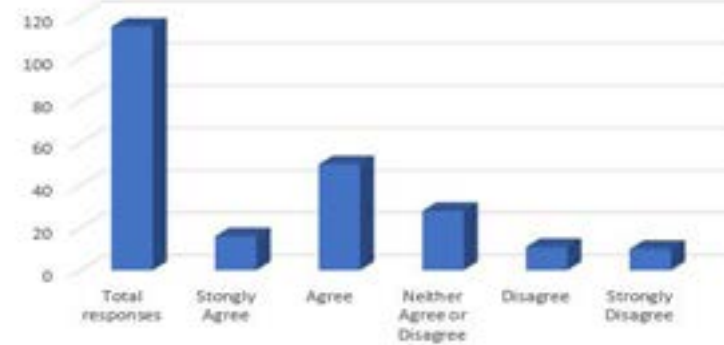
The majority of people stated that people need time to adjust to changes associated with travelling independently, and that to refuse travel assistance after refusing to participate is unfair.

People were keen to be assured that travel training could be available throughout the provision of travel assistance, and that the option to introduce it would be reviewed during regular intervals, and especially when assessments for care and support provisions are being carried out.

People were keen to see the assessment criteria and methodology behind the assessment, and felt this detail was lacking in the consultation material.

2.4 Personal transport budgets may be useful for families who are eligible for travel assistance.

### Overview



The majority of people were in favour of this proposal, with 66 Strongly Agreeing or Agreeing, 28 Neither Agreeing or Disagreeing, and 21 Disagreeing or Strongly Disagreeing.

Parents were keen to state they would love the opportunity to be able to take their children to school and welcomed this proposal if it meant money to be able to do so; some questioned how it would be ensured that funds would be spent on travel.

Comments were made that some people may need advice and support on how to spend personal transport budgets, and what options were open to families. Some people felt the consideration of personal transport budgets was the council's way of saving money and that this approach would inconvenience families.

Some people stated personal transport budgets were a good way of promoting independence, and should be offered if it was felt by the individual or family that it would be of benefit.

Comments were made that staff would require training on personal transport budgets in order to accurately inform individuals and families of how they work and the options available.

### Recommendations:

- Provide clarity on how assessments would be carried out, when and how often, how changes in circumstances would be dealt with, the decision-making process following assessment and when decisions would be communicated



## 4.0 Analysis of Consultation and Engagement Responses

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- Consider assessment criteria to be more than just age-based
- Provide clarity that independent travel training would only be offered and provided to those individuals for whom it is considered appropriate, and that any recommendations to introduce travel training would be carried out following assessment and discussions with a range of people involved in the provision of support for the individual, including parents and professionals as appropriate
- Provide clarity on who would be carrying out the assessments, when they would be carried out, how often and how these assessments would be co-ordinated around other assessments related to care and support of individuals
- Clarify when independent travel training could be introduced for individuals, and what the law says about children and young people in this regard
- Provide assurances that any new travel assistance options introduced would be recommended on an individual basis, if and where appropriate
- Consider what training needs may exist and ensure clarity and consistency of information being shared about travel assistance options
- Consider risk and safeguarding issues arising from the introduction of new travel assistance options and address accordingly

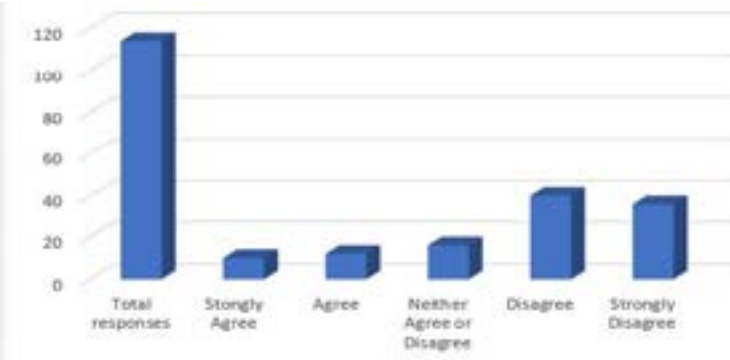
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Three

The introduction of charges for young people of sixth form age.

3.1 Young people of sixth form age should make a financial contribution for their transport provision, which would align Wolverhampton with neighbouring Local Authorities.

#### Overview



**The majority of people disagreed with this proposal, with 22 Strongly Agreeing or Agreeing, 16 Neither Agreeing or Disagreeing, and 76 Disagreeing or Strongly Disagreeing.**

This proposal prompted animated discussions, with wide-ranging opinions.

People were concerned by what is regarded as 'low-income', and the impact this could have on a family's finances as well as on young people's opportunities to access further education post-16.

Questions were asked about the legal position of charging young people while attending compulsory education. Some people said imposing a charge was unfair as it isn't the fault of children and young people requiring travel assistance.

Some people recognised that other local authorities are charging for this assistance, and that mainstream students are currently already paying for their travel where they are not eligible for support from City of Wolverhampton Council.

Some people expressed dissatisfaction that some families are receiving support to provide travel (in both benefits and through mobility vehicle arrangements, and are also being provided with free transport by the

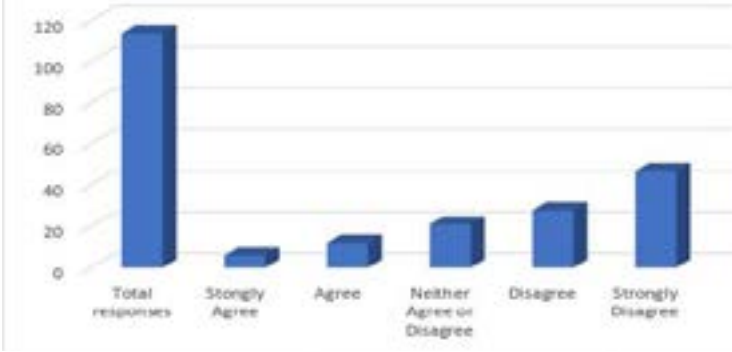
council for their child or young person. Some people felt this was 'double-funding' families; others asked why they were paying for this twice as a council tax payer.

Some people recognised that benefits payments do have an element of travel included, and that not everyone who is eligible for travel assistance is eligible for benefits which include travel components.

Some stated it would not be fair to pay and was discriminatory.

3.2 £780 per academic year or £390 if the child or young person is from a low-income family, is a fair charge.

#### Overview



**The majority of people disagreed with this proposal, with 18 Strongly Agreeing or Agreeing, 21 Neither Agreeing or Disagreeing, and 75 Disagreeing or Strongly Disagreeing.**

Similarly, this proposal prompted animated discussions, with wide-ranging opinions.

Many questioned the level of contribution proposed, and how it had been arrived at. Some people stated it was 'high', and questioned the impact this would have on families at the lower end of the earning scale. People stated that imposing this contribution could be the 'tipping point' for many families. Some expressed concern for families on a single income, and the impact this would have on a family's ability to have a holiday each year. Some people stated the family's annual holiday was a valuable respite resource and would suffer if this level of contribution was introduced.

People asked if the contribution could be percentage-based, or calculated as a percentage of the benefits the

## 4.0 Analysis of Consultation and Engagement Responses

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individual accessing the transport is in receipt of, rather than the income of the individual's family.

Others asked if the contribution could be based on distance travelled and mode of travel; some suggested a contribution more aligned to what mainstream pupils pay for a bus pass should be considered.

Some people asked if there was a hardship fund which would be made available for families unable to afford this contribution. Others stated the cost of travel needed to be fair and consistent, but with allowances for those families unable to pay the full amount.

### Recommendations:

- Consider the criteria when assessing eligibility for financial contributions (income-based, or means-tested, receipt of benefits/grant/bursaries etc. to assist with payments?)
- If implemented, consider other sources of transport support – e.g. Sixth Form Schools and Colleges which provide bus passes or other transport support for students – and how this information could be shared
- Clarify how transport for sixth form/college students is provided, who is responsible for arranging and providing, and how this is funded or if self-funded
- Clarify the law around free transport and compulsory education, and transport and post-16 education in any policy progressing from this proposal.

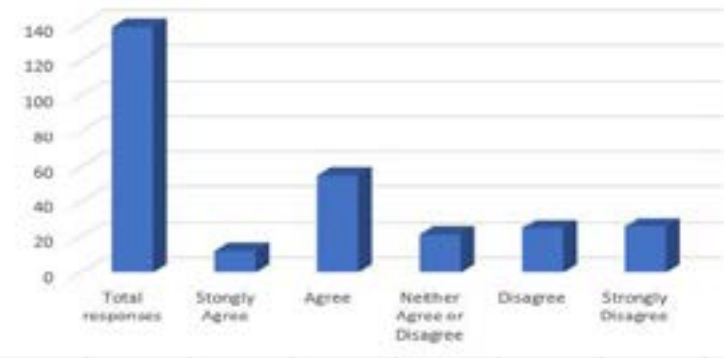
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Four

The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional, and Mental Health SEMH needs.

4.1 This change would ensure fairness and consistency under the new policy, as pupils with SEMH needs would be assessed in the same way as all other pupils.

### Overview



**This proposal divided people, with 67 Strongly Agreeing or Agreeing, 21 Neither Agreeing or Disagreeing, and 51 Disagreeing or Strongly Disagreeing.**

This proposal prompted a mixed reaction. The majority of people viewed this proposal as an opportunity to treat every person receiving travel assistance as an individual, rather than those with SEMH needs being 'labelled'.

Some parents of SEMH children, young people and adults were keen to see them have the same opportunities as others; some were concerned that their SEMH needs would be ignored in an effort to save money.

People were keen to state that everyone's needs are different, and that their travel assistance options should reflect this, and respond to their needs.

Some people stated if an individual has an ECHP they should be eligible for transport irrespective of their category of need. Some suggested that psychological professionals should be included in assessments of SEMH.

Some felt this proposal was penalising people with SEMH needs, and that by removing this automatic eligibility the council would be ignoring those needs.

### Recommendations:

- Clarify that the removal of the automatic eligibility means that individuals with SEMH needs would be assessed under the process proposed at Proposal Two
- Ensure that all necessary risk assessment and safeguarding measures are included within any changes implemented under this proposal
- Provide clarity that if implemented in the new policy, this proposal would not impact on an individual's ability to access the travel assistance they are eligible for.

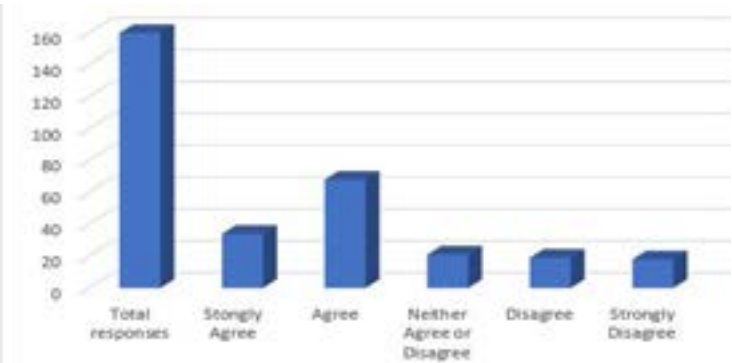
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Five

To provide transport only from a single address unless there are exceptional circumstances.

#### 5.1 Transport should only be arranged based on an individual's usual home address.

##### Overview



**The majority of people were in favour of this proposal, with 102 Strongly Agreeing or Agreeing, 21 Neither Agreeing or Disagreeing, and 37 Disagreeing or Strongly Disagreeing.**

Some focus group discussions on this proposal were lengthy, focussing on whether there was actually a problem that needed addressing, and whether this would impact on families with parents living apart, or where support was provided at a more than a single address.

Recurring questions and concerns among participants to the focus group, and among those completing the questionnaire were raised on the issue of an 'exceptional circumstance' and what its definition was, and on whether respite care was an exceptional circumstance.

People asked what would happen if people were stuck in traffic and could not be home in time for drop-off, if working irregular hours or overtime would be an exceptional circumstance, and if foster families would be included within this approach.

Transport professionals offered statements that bus routes are not changed for different addresses, but that individuals who need to go to a different address use a different route to their normal one.

Pupils participating at school focus groups said different addresses caused confusion and distress for those who rely on a routine.

Concern was expressed about the age of people using transport where routes are changed to accommodate different addresses, and the impact on the length of their journey.

Some people questioned if more than one address was an issue as they were not personally aware of it so did not believe it happened.

Concerns were expressed that this proposal provided no flexibility for changing circumstances; this was countered by statements that it removed a lot of flexibility and prevented people from 'abusing' the service provided.

### Recommendations:

- To confirm what constitutes an 'exceptional circumstance' and where possible give examples which are recognisable to people receiving travel assistance, e.g. *'where an individual is provided transport to and from their home address, and accesses respite care at a different address as part of their ECHP, this would be an exceptional circumstance'*
- Confirm the arrangements for separated families, where a court order is and is not in place
- Consider principles underpinning transport policies around length of journey and ages of passengers using transport

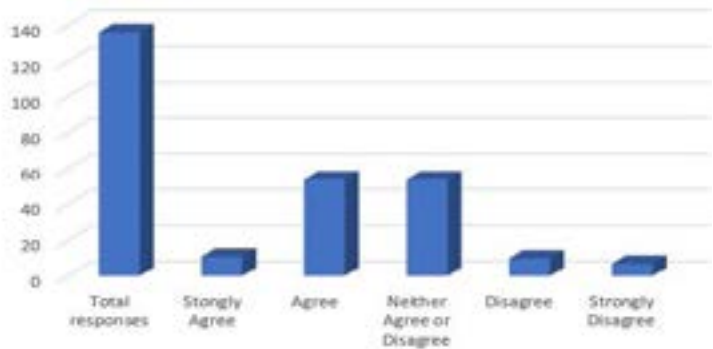
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Six

To amend and clarify the application and appeals process for Home to School Assistance.

6.1 The proposed policy is clear about how the application and appeals process for home to school travel assistance works.

#### Overview



**The majority of people were in favour of this proposal, with 65 Strongly Agreeing or Agreeing, 54 Neither Agreeing or Disagreeing, and 17 Disagreeing or Strongly Disagreeing.**

The majority of people agreed with this statement, although some stated it was confusing, and does not include people with experience of working with people with additional needs.

Some commented that the process seemed clear, but the application of the process to individual’s circumstances depended on the individuals involved.

Some stated that if the policy, assessment process and decision-making processes were robust enough and applied as they should be, an appeals process would not be necessary.

A number of people commented that they did not understand the information, or process, and were confused and upset by it.

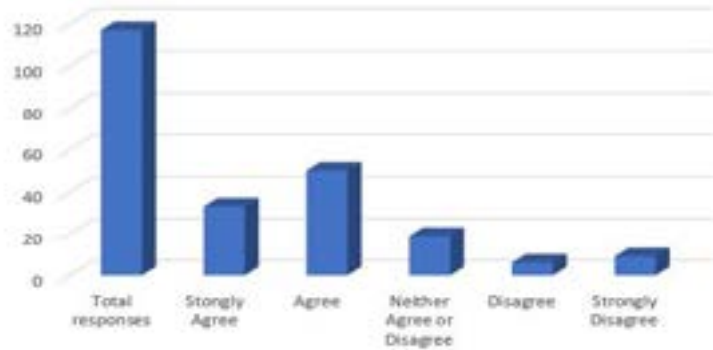
Comments were made about the need for clear guidelines to avoid deviation, and that the appeals process was not as independent as was stated in the policy as it includes Head of Service and department leads who they felt would ‘toe a line’.

There was a feeling that the process could be improved with more clarity and a different panel.

Some said the appeals process should permit appeals irrespective of whether material changes had taken place, and that appeals should not rely on time-restricted information.

6.2 The Stage 2 Appeal Panel should be changed from a panel of Councillors to a panel consisting of a Councillor, the appropriate Head of Service or their representative, a senior transport officer and an appointed parent representative to reflect good practice.

#### Overview



**The majority of people were in favour of this proposal, with 83 Strongly Agreeing or Agreeing, 19 Neither Agreeing or Disagreeing, and 15 Disagreeing or Strongly Disagreeing.**

The proposed panel was welcomed by the majority of people, who also took the opportunity to suggest further improvements to it.

Many people suggested health, educational, social worker, transport, health and safety and counselling professionals, as well as family and community organisations, could also be involved with the panel to provide a breadth of expertise, experience and knowledge otherwise missing. Some asked if a SEND officer should also be on the panel.

Some questioned whether any councillors were needed on the panel; others felt having a councillor on the panel would allow their voice to be heard, as they are elected to represent their community’s views.

Parents were keen to understand what a ‘parent representative’ would be and how this would work; some expressed dissatisfaction at not being able to take support with them to the appeal hearing, and that

## 4.0 Analysis of Consultation and Engagement Responses

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inadequate information was provided about what is and is not permissible.

### Recommendations:

- Consider amending the appeals panel to include professionals with specific knowledge and experience, to ensure that all information and contexts are understood when decision-making is taking place
- Clarify in the policy how the appeals process works, how long it takes, what evidence is required, when appeals can be lodged
- Consider if and how the appeals panel could include more independent representatives to ensure greater independence and integrity in the process
- Consider how advice and guidance to parents/carers and how this could be improved to provide greater clarity



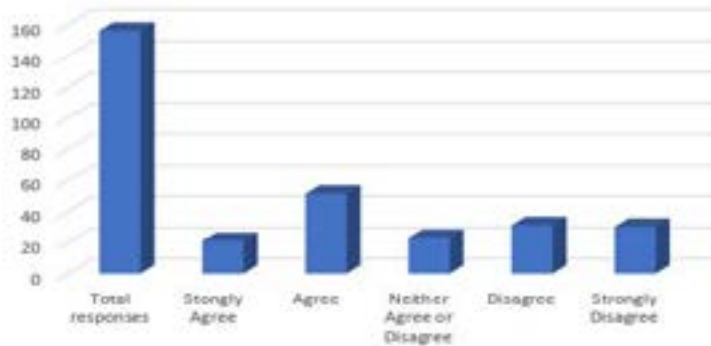
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Seven

The policy aims to more clearly explain that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances.

7.1 Unless there are exceptional circumstances an individual should only receive travel assistance to the nearest appropriate educational establishment or social care venue.

#### Overview



**The majority of people were marginally in favour of this proposal, with 72 Strongly Agreeing or Agreeing, 23 Neither Agreeing or Disagreeing, and 61 Disagreeing or Strongly Disagreeing.**

People were concerned about what 'appropriate' means, and were worried about the implications of a 'nearest appropriate' location being considered inappropriate by them because of bullying issues, or other causes for concern.

People felt this takes away parental choice because any deviation from the recommended nearest appropriate location for children or adults would result in the family having to pay for travel assistance and therefore having no choice if they are unable to pay.

People were concerned about the impact on 'nearest appropriate' locations being away from their home communities and the ability of the individual to be part of their community and become familiar with it.

Some people felt this proposal is a 'get out' clause for the council to remove its legal responsibility to provide transport.

Some participants to the focus groups stated they had

no issues with the proposal; others stated there needs to be a professional involved with the decision-making on what is an 'appropriate school'. Some concerns were expressed around the language used and how this could be a barrier.

#### Recommendations:

- Clarify what is meant by 'nearest appropriate'
- Clarify the legal position on what the council must provide and how this proposal meets that responsibility
- Clarify the impact, if any, on parental choice
- Clarify what options may be available, if any, to address concerns about schools or day centres deemed the nearest appropriate.



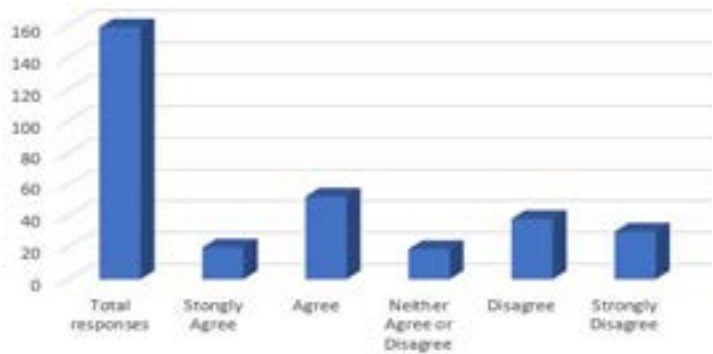
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Eight

The policy aims to more clearly explain that where individuals are eligible for transport, pick-up points will be used unless there are exceptional circumstances.

8.1 Unless an individual has significant needs, Council-provided transport should be from a designated pick-up point, within a reasonable distance of their home.

#### Overview



**People were divided over this proposal, with 72 Strongly Agreeing or Agreeing, 19 Neither Agreeing or Disagreeing, and 68 Disagreeing or Strongly Disagreeing.**

This proposal prompted a range of views, with many expressing a belief that it was a 'backward step' without realising pick-up points are already in use, and are regarded by those who use them as 'working very well'.

Concerns were expressed about where pick-up points are or would be, if and how they would be risk-assessed to address any safeguarding issues, how weather, unreliable transport and the general risks of life would be addressed.

Many people stated this proposal and statement was a good idea, would prepare people for later life and allow them to start developing more independence and integration in communities. Some did not feel pick-up points were appropriate.

Some people were unsure of the term 'significant needs' and required clarification on that and the phrase 'reasonable distance' before making a view known.

Some felt the use of pick-up points would depend on the age and ability of the individual; others noted this would be part of the ECHP and that would be part of the

personalised assessment.

Others were concerned that using pick-up points would place vulnerable people at risk in public places; others stated their family member could not be trusted.

People took the opportunity to improve how pick-up points could be incorporated into the proposed policy, through the use of walking buses, escorts meeting people at pick-up points instead of arriving on the transport, and that pick-up points should be sheltered.

#### Recommendations:

- Consider the incorporation of the suggestions made to help people understand the benefits of pick-up points
- Consider offering trials to pick-up points as a travel assistance option so people can test it before committing to it
- Consider calling for suggestions of pick-up points people would accept being used, and include these when deciding where pick-up points will be designated.

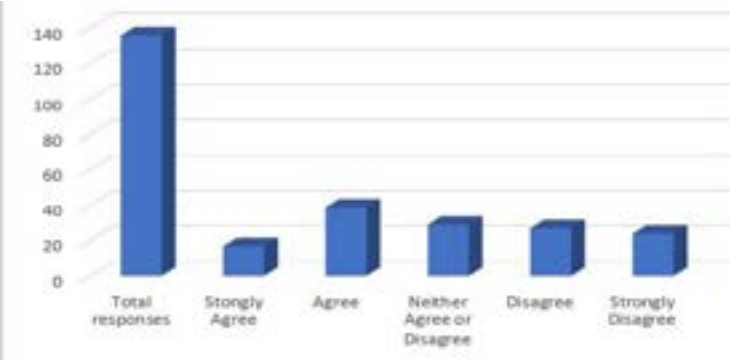
## 4.0 Analysis of Consultation and Engagement Responses

### Proposal Nine

The new policy aims to explain more clearly that parents are expected to accompany their children unless there are exceptional circumstances.

9.1 The proposed policy is clear in explaining that parents are expected to accompany their children to school.

#### Overview



**The majority of people disagreed with this proposal, with 56 Strongly Agreeing or Agreeing, 29 Neither Agreeing or Disagreeing, and 51 Disagreeing or Strongly Disagreeing.**

This proposal is not supported by the majority of people responding to the questionnaire, although most people participating in focus groups understood it was clarifying the law and agreed it was a good idea.

Some people did ask why the council needed to make this clarification; others seemed to think the council was criticising those who are not able to take their children to school. Some seemed to think they were being told they had to accompany their 17-year old or 18-year old teenagers to school when they would not want it, having already been encouraged to promote independence.

Some people also thought this meant that they should be accompanying their children when provided with council transport.

#### Recommendations:

- Clarify the language which can be used and consider amending 'accompany their children to school' to 'get their children to school'
- Clarify how the responsibility changes if a child is

walking to school and if they are in receipt of council transport

- Clarify what is meant by this proposal - and that it does not remove the promotion of independence and preparing children and young people for adulthood
- Clarify where the parental responsibility ends if their child is receiving travel assistance and provide recognisable examples as reference points
- Clarify if, and under what circumstances, parents can pass the responsibility on to older siblings, e.g. where an older sibling attends a mainstream school where the child also attends

## 4.0 Analysis of Consultation and Engagement Responses

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### General Comments Feedback

#### Considerations

- By July so ready for September – all school and parents know by July
- The need of the whole family – implications of childcare / care for adults as we have to work!
- I feel this is a good opportunity to develop the service and involve everyone.
- One size does not fit all – there isn't a quick fix. Just because the LOP ends at 25 – life care and support doesn't. Adults count too!
- Changes will need to be implemented slowly

carers and people receiving travel assistance are informed about the changes, when this update is shared and how it is shared to both those who receive travel assistance and their parents/carers as well as the wider communities who may be affected now or in future.

#### Suggestions/Comments

- Clear proposals and very basic information needs to reach all parents and young people
- With both children need and help and support to go to school as I live in Bilston and one goes Green Park and my 13 year old goes Westcroft School. Both my boys need transport support – it is fair for us to keep them both there
- People that know the child personally should be involved in the decision
- If parents have their own disabilities or lots of little children it can be very hard to get to two or three schools. A special needs child will make it even harder to do the school run. I don't think any special needs child should be left to get to and from school alone. Assessments must be covered by people who know how these children behave! All have their own issues.

#### Recommendations:

- Provide an update on the council's website, and direct to people who receive travel assistance about how their feedback has shaped the proposals following consultation and your consideration of their comments and this report
- Consider the programme of implementation, and how this could be achieved to ensure schools, transport providers (new and existing), parents and carers are aware of any changes to their travel assistance provision ahead of education or day centre terms starting in September
- Consider how changes will be implemented and whether this can be achieved and over how long a period
- Consider how the information shared with parents/

## 4.0 Analysis of Consultation and Engagement Responses

### Analysis of Out of Scope Responses to Proposals

Focus groups prompted many people to offer information about their experiences of as a parent or carer of a child, young person or adult who receives travel assistance from the council.

It was apparent early on that many people - the majority - have a high level of mistrust, and feel they are constantly having to fight for support they feel they are eligible for.

Many people used negative and combative language, such as 'we have to fight', 'it's a battle..', 'you have to make it sound worse', and 'why are you talking to us again, nothing has been done since the last time...' during discussions.

Specific comments were made about the council's focus on a service improvement narrative rather, and ignoring the decisions to spend significant amounts on capital project delivery.

Equally, many people attended the focus groups with a view to hearing the proposals having previously engaged with the pre-consultation travel offer conversations earlier in 2019, and wishing to have their say on the proposals. They also used the opportunity to air concerns or raise complaints about a range of areas which they felt could and should also be improved.

Many people noted that the social workers are very good, and do a good job, but that there are 'just not enough of them'.

Areas people made comments about include:

- Parents/Carers' relationships with the council and a lack of trust that the decisions have not already been made
- Issues impacting on the travel assistance provided or Independent Travel Training - these relate to service providers or highways infrastructure, as well as single-parent families struggling to cope with the stresses and demands of caring for someone with additional needs
- Implementation of the policy
- Use and implementation of technology
- Social workers
- Consistency
- Clarity around how the travel unit and assessment

would work

- Support for parents
- Promoting independence
- Transport provision/assessment
- ECHP
- SENCO/SenStart and knowledge
- Eligibility
- Awareness of rights/support available
- Communications
- Ring + Ride, including a number of concerns by one parent
- General comments about transport-related issues
- General comments about support/life with a person who needs support
- General comments from Changing Our Lives
- General comments from Alzheimer's Society.

Two areas of concern stood out during the focus group discussions - Consistency and Communication. Both were felt to be an easy area to address, and participants to focus groups have made a number of suggestions about how these, and other areas of concern could be improved.

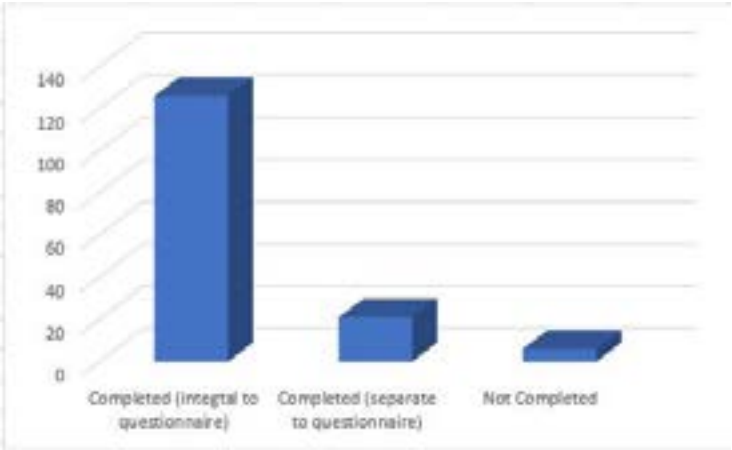
### Recommendations

- Consider how the council could begin to improve relations by addressing what people regard as 'basics' e.g. communications, consistency and information being shared. This could be through the introduction of a regular email bulletin to registered recipients of travel assistance about service changes/improvements, staff updates, availability of funding through grants or bursaries, events and other information which may be of interest
- Ensuring families/carers and people receiving travel assistance are involved when decisions about transport mode are being made, or when modal changes are required and unavoidable
- Review Ring + Ride, and the service people are experiencing and consider how to best address the concerns, complaints and issues people have identified
- Review the reliability of the current service and consider how and where improvements could be made in advance of any new policy or proposals being adopted.

## 5.0 Equal Opportunities Monitoring

This section deals with the Equal Opportunities Monitoring form responses received during the consultation.

The following chart sets out the number of responses provided to the Equal Opportunities Monitoring forms which formed part of the consultation questionnaire.



The total number of Equal Opportunities Monitoring Forms returned, completed, was 147. This figure includes copies of the form which were both integral to the consultation questionnaire, and separate to the questionnaire. We have endeavoured to identify any duplications but have not been able to due to the anonymous nature of the forms, and not all questions being answered by respondents.

The following tables set out the responses by Equalities Opportunity Monitoring characteristics, as well as geographic area:

- Age
- Gender
- Birth Assigned Gender
- Sexual Orientation
- Ethnic Origin
- Religion
- Disability
- Postcode Prefix

### Third Party Facilitated Workshops

A total of 16 people attended the workshops facilitated by Alzheimer’s Society, of which four have a Dementia diagnosis.

Changing Our Lives reported Equal Opportunities Monitoring data in the same way this has been recorded

throughout the consultation. This data is included in the following tables.

Alzheimer’s Society reported the Equal Opportunities Monitoring, rather than providing raw data. The data provided has been extracted and is reported beneath each tables.

### Equal Opportunities Monitoring

Age

Age	Number of Respondents
Under 16	0
16-24	6
25-34	21
35-44	56
45-54	47
55-64	24
65-74	9
Totals	163

Alzheimer’s Society reported 93 per cent of participants in the workshops were over 65. Seven per cent of participants did not provide a response.

Gender

Gender	Number of Respondents
Male	48
Female	123
Prefer not to say	9
Totals	180

Alzheimer’s Society reported 53 per cent of participants in the workshops were male; 47 per cent female.

Birth Assigned Gender

Assigned Gender	Number of Respondents
Yes	156
No	
Prefer not to say	10
Totals	166

Alzheimer’s Society reported 93 per cent of participants in the workshops identified with the same gender as they

## 5.0 Equal Opportunities Monitoring

were assigned at birth; seven per cent did not.

### Sexual Orientation

Sexual Orientation	Number of Respondents
Heterosexual/Straight	136
Bisexual	1
Lesbian/Gay Woman	2
Unsure	3
Prefer not to say	21
Totals	163

Alzheimer’s Society reported 100 per cent of participants in the workshops were heterosexual/straight.

### Ethnic Origin

Ethnic Origin	Number of Respondents
Caribbean	2
Indian	5
Other Black	1
White British	115
Asian/British Asian	1
Other White	1
Pakistani	1
Asian or British Asian - Indian	16
Asian or British Asian - Pakistani	2
Black or Black British - African	13
Black or Black British - Caribbean	2
Chinese	1
Other Black or Black British	1
White Other European	2
White and Black Caribbean	1
White Gypsy / Irish Traveller	1
Totals	21

Alzheimer’s Society reported 53 per cent of participants in the workshops were over White British; 27 per cent

were Caribbean and 20 per cent were Indian.

### Religion

Religion	Number of Respondents
Sikh	11
Pagan	1
Christian	72
Hindu	5
Muslim	7
Prefer not to say	21
Any other religion	7
No religion	49
Totals	174

Alzheimer’s Society reported 67 per cent of participants in the workshops were Christian; 20 per cent had no religion and 13 per cent did not provide a response.

### Disability

Disability	Number of Respondents
Yes	65
No	94
Not sure	2
Prefer not to say	14
Totals	175

Alzheimer’s Society reported 100 per cent of participants in the workshops did not consider themselves to have a disability.



## 5.0 Equal Opportunities Monitoring

Postcode Prefix

Postcode Prefix	Number of Respondents
WV1	6
WV2	6
WV3	8
WV4	5
WV5	1
WV6	14
WV10	18
WV11	8
WV13	3
WV14	10
Totals	77

people receiving transport assistance from geographical areas of Wolverhampton under-represented in consultation responses. Are there any geographical areas with no or lower than proportionate representation within the sample of respondents?

4. Consider how City of Wolverhampton can improve engagement activity generally with under-represented characteristics.



Alzheimer’s Society reported postcode prefixes in the same way they have been recorded throughout the consultation. This data is included in the above table.

### Recommendations

1. Refer to demographics of Wolverhampton, and of people receiving travel assistance by City of Wolverhampton Council, and
2. Consider if any further work is required to engage any characteristics protected by the Equalities Act 2010 under-represented in consultation responses
3. Consider if any further work is required to engage any

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## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
<b>Proposal One</b> City of Wolverhampton Council's current Home to School Travel Policy, Post 16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance Policy	<ul style="list-style-type: none"> <li><b>The majority of people were in favour of this proposal.</b></li> <li>There were some mixed views about this proposal, with some people noting that they did not feel this was a matter for a public consultation, and that a consistently high-quality provision was more important than being asked how policy documents should be structured</li> <li>Comments were also made about the <b>draft policy</b>, with people stating that it was <b>confusing and contained information some did not regard as relevant</b></li> <li>Some people expressed concern that a single policy document would be a <b>'big mess' and that it would lead to a 'one size fits all' approach to providing travel assistance</b> to those who are eligible</li> <li>There were concerns over how pupils with special educational needs and disabilities who attend mainstream schools would be addressed within the policy, and that the <b>single policy document would only benefit younger people.</b></li> </ul>	<b>Agree to implement proposal:</b> To combine the City of Wolverhampton Council's current Home to School Travel, Post 16 Transport statement and Adult Social Care Transport protocol into a single All Age Travel Assistance Policy	<b>Benefits:</b> <ul style="list-style-type: none"> <li><b>Majority of consultees were in favour of this proposal</b></li> <li><b>policy will be clearer and easy to understand.</b></li> <li><b>Will improve transition between child and adult services</b></li> <li>Joint planning and commissioning services may provide a better use of resources and a more joined up approach to provision</li> </ul> <b>Risks:</b> <ul style="list-style-type: none"> <li><b>Some other Local Authorities have faced legal challenges if policies are difficult for the average parent to understand.</b></li> </ul>
<b>Proposal Two</b> The introduction of a personalised assessment process	<p><b>The proposed policy is clear about how a personalised assessment would be carried out.</b></p> <ul style="list-style-type: none"> <li>The majority of consultees were in favour of this proposal</li> <li>Generally, discussions during focus groups were that <b>personalised assessments are a good idea as long as the right person does them</b></li> <li>People were clear that a <b>'one size fits all' approach was not suitable</b> and that a personalised assessment would ensure this was avoided</li> <li><b>More clarity was needed around what the assessment process would look like</b> and what a <b>'relevant professional' means</b></li> <li>People were concerned that the policy under consultation <b>does not include criteria for the</b></li> </ul>	<b>Agree to implement proposal:</b> To introduce a personalised assessment process for travel assistance.	<b>Benefits:</b> <ul style="list-style-type: none"> <li><b>Results from consultation support proposal</b> to introduce a personalised assessment process</li> <li><b>Promotes independence</b>, is person-centred and leads to a wider travel offer</li> <li>The <b>promotion of independence increases confidence</b> and enables individuals to access more social, educational and employment opportunities</li> <li>Feedback from engagement suggests our citizens would welcome <b>greater personalisation</b></li> <li>Independent travel training optimises the <b>efficient use of Council resources</b></li> <li>May <b>reduce reliance on Adult Social Care and provision</b> in the future</li> </ul>

## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
	<p><b>assessment</b> and that this could create loopholes which the Council could use to deny travel assistance</p> <p><b>Individuals eligible for travel assistance should receive independent travel training, to help promote their independence, unless there is a good reason why this would not be appropriate</b></p> <ul style="list-style-type: none"> <li>• The majority of consultees were in favour of this proposal</li> <li>• People generally <b>accepted that travel training was good for promoting independence</b> but stated that it was <b>not going to be appropriate for all</b>, regardless of an individual's desire to be travel trained.</li> <li>• <b>People were concerned about public transport and the risk/safeguarding issues raised</b>, as well as how people would deal with uncertainties of late transport, changes to timetables, etc.</li> </ul> <p><b>If an individual is assessed as able to benefit from travel training and then refuses to participate in the programme, no further offer of travel assistance will be provided.</b></p> <ul style="list-style-type: none"> <li>• <b>The majority of people disagreed with this</b>, stating that people need time to adjust to changes associated with travelling independently, and that to refuse travel assistance after refusing to participate is unfair</li> <li>• <b>People were keen to see the assessment criteria and methodology behind the assessment</b>, and felt this detail was lacking in the consultation material</li> </ul> <p><b>Personal transport budgets may be useful for families who are eligible for travel assistance.</b></p> <ul style="list-style-type: none"> <li>• The majority of consultees were in favour of this proposal</li> </ul>		<ul style="list-style-type: none"> <li>• Personal Transport Budgets enable greater <b>freedom and flexibility for families to make travel arrangements</b> that best meet their family's needs and circumstances</li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li>• There is a risk that there will not be enough capacity to deliver travel training for those assessed as appropriate</li> <li>• May <b>result in higher emissions</b> if more parents transport children in their own car and more cars at peak times</li> <li>• Personal Transport Budgets may potentially increase costs.</li> </ul>

## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
	<ul style="list-style-type: none"> <li>Some parents/ carers <b>welcomed this proposal if it meant money to be able to do so</b>; Some people felt the consideration of personal transport budgets was the <b>Council's way of saving money and that this approach would inconvenience families.</b></li> </ul>		
<b>Proposal Three</b> The introduction of charges for young people of sixth form age  Page 75	<p><b>Young people of sixth form age should make a financial contribution for their transport provision</b></p> <ul style="list-style-type: none"> <li><b>Most people predominately disagreed with this proposal</b></li> <li>People were concerned by what is regarded as 'low income', and the impact this could have on a family's finances as well as on young people's opportunities to access further education post 16</li> <li>Questions were asked about the <b>legal position of charging young people while attending compulsory education</b></li> <li>Some people said <b>imposing a charge was unfair</b> as it isn't the fault of children and young people requiring travel assistance</li> <li>Some people expressed <b>dissatisfaction that some families are receiving support to provide travel in both benefits and through mobility vehicle arrangements and are also being provided with free transport</b> by the Council for their child or young person</li> </ul> <p><b>£780 per academic year or £390 if the child or young person is from a low-income family, is a fair charge.</b></p> <ul style="list-style-type: none"> <li>The majority of consultees disagreed with this statement</li> <li>Some people stated it was 'high' and questioned the impact this would have on families at the lower end of the earning scale</li> </ul>	<p><b>Agree to implement proposal:</b> Introduce charges of young people of sixth form age</p>	<p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li><b>Most other local authorities request a financial contribution for Post 16 transport</b></li> <li>£600 and £300 (for pupils from low income families) is more in line with neighbouring authorities such as Walsall and Dudley</li> <li>Enables a more consistent approach to all pupils aged 16-19</li> <li>Through implementing post 16 charging from September 2021 will enable more time for pupils, parents and schools to prepare for incoming charges</li> <li>All pupils currently in receipt of free travel assistance aged 16-19 will continue to receive this at no cost</li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li>Proposal is <b>not supported by outcome of consultation</b>; however, the Council have taken into consideration the feedback from consultation that the proposed charges were too high and have reduced them to £600 and £300 (for pupils from low income families)</li> <li>Proposal <b>may prevent young people from accessing education</b> and may increase NEET (Not in Education, Employment or Training) numbers</li> <li>May be introducing a charge 16-19 only for transport to become free after 19</li> </ul>

## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
	<ul style="list-style-type: none"> <li>People stated that imposing this contribution <b>could be the ‘tipping point’ for many families.</b></li> <li>Some expressed concern for families on a <b>single income</b> and people asked if the contribution could be <b>percentage based</b> or calculated as a percentage of the benefits the individual accessing the transport is in receipt of, rather than the income of the individual’s family.</li> </ul>		<ul style="list-style-type: none"> <li><b>16-19 bursary</b> is also used to access other things such as books and work experience clothing and transport may take up considerable amount of this bursary which some schools use as pupil premium</li> <li>The person would be an adult in their own right, but as they are in full time education, <b>they may not have the means to pay for transport. A parent is not financially responsible for a child when they are over 18.</b></li> </ul>
<b>Proposal Four</b> The removal of automatic eligibility to travel assistance in an educational establishment for Social Emotional and Mental Health (SEMH) needs	<b>Most consultees agreed with proposal, although may consultees opted to say neither agree or disagree.</b> <ul style="list-style-type: none"> <li>Some viewed this proposal as <b>an opportunity to treat every person receiving travel assistance as an individual</b>, rather than those with SEMH needs being ‘labelled’</li> <li>Some were keen to see that they have the <b>same opportunities as others</b>; some were concerned that their SEMH needs would be ignored in an effort to save money.</li> </ul>	<b>Agree to implement proposal:</b> Remove the automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs	<b>Benefits:</b> <ul style="list-style-type: none"> <li>Delivers <b>clarity and consistency across the policy</b></li> <li>Promotes and maximises the independence of all children and young people, enabling pupils with SEMH to <b>access independent travel training</b></li> <li>Optimises the most efficient use of Council resources</li> </ul> <b>Risks:</b> <ul style="list-style-type: none"> <li>There may be <b>disruption to the routine of this cohort of children and young people</b>, some of whom may be at high risk of <b>disengaging from the education system</b></li> <li><b>The social cost of this impact is difficult to ascertain.</b></li> </ul>
<b>Proposal Five</b> To provide transport only from a single address unless there are	<b>The majority of people were in favour of this proposal.</b> <ul style="list-style-type: none"> <li>Majority of consultees <b>wanted clarity around exceptional circumstances</b></li> <li>Pupils participating at school focus groups said <b>different addresses caused confusion and distress for those who rely on a routine</b></li> </ul>	<b>Agree to implement proposal:</b> To clarify in the All Age Travel Assistance Policy that travel assistance will only be provided from a single address	<b>Benefits:</b> <ul style="list-style-type: none"> <li><b>Results from consultation support proposal to provide transport from one single address</b></li> <li><b>Single address allows for consistency in route planning</b></li> <li><b>Decreased journey times</b> and reduced emissions through more efficient route planning</li> </ul>

## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
exceptional circumstances	<ul style="list-style-type: none"> <li>Concern was expressed about the age of people using transport where routes are changed to accommodate different addresses, and the impact on the length of their journey</li> <li><b>Concerns that this proposal provided no flexibility for changing circumstances.</b></li> </ul>		<ul style="list-style-type: none"> <li>This proposal could lead to more <b>efficient use of Council owned vehicles</b></li> <li>Clear exceptional circumstances outlined in the policy for individuals that have more than one address</li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li>Concerns have been raised by equalities that implementing this policy would have a far more <b>significant impact on children whose parents have separated</b>, or individuals being cared for at multiple addresses (this has been mitigated in the policy)</li> <li>May be an increased number of appeals.</li> </ul>
<b>Proposal Six</b> To amend and clarify the application and appeals process for Home to School Travel Assistance	<p><b>Outcome of consultation:</b></p> <ul style="list-style-type: none"> <li><b>The majority of people were in favour of the proposal</b> and agreed that the proposed policy is clear about how the application and appeals process for home to school travel assistance works</li> <li>A number of people commented that they did not understand the information, or process, and were confused by it.</li> </ul> <p><b>During consultation the following second stage appeals process was consulted on:</b>            The Stage 2 Appeal Panel should be changed from a panel of Councillors to a panel consisting of a Councillor, the appropriate Head of Service or their representative, a Senior Transport Officer and an appointed parent representative</p> <p><b>Outcome of consultation:</b></p> <ul style="list-style-type: none"> <li><b>Majority of consultees agreed with the proposal</b></li> <li>The <b>proposed panel was welcomed by the majority of people</b>, who also took the opportunity to suggest further improvements to it</li> </ul>	<p><b>Agree to implement proposal:</b> To amend and clarify the application and appeals process for Home to School Travel Assistance and agree to implement independent appeals panel for the second stage appeals process to mirror school admissions appeals process.</p>	<p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li>It ensures a <b>fair process and is consistent with other appeals processes across the Council</b></li> <li><b>Previous second stage appeals process has been difficult to administer due to lack of clarity</b></li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li><b>There may be confusion if adults have a different appeal process</b> which is currently the complaints procedure</li> <li>The analysis of consultation has resulted in a planned change in the format of the second stage appeals process</li> <li><b>Panel may be more sympathetic and refuse appeal</b></li> </ul>

## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
<div>Page 99</div>	<ul style="list-style-type: none"> <li>Many people suggested health, educational, social worker, transport, health and safety and counselling professionals, as could also be involved with the panel to provide a breadth of expertise. Some asked if a SEND officer should also be on the panel</li> <li>Some <b>questioned if Councillors were needed on the panel; others felt having a Councillor on the panel would allow their voice to be heard</b></li> <li><b>Parents were keen to understand what a 'parent representative' would be and how this would work;</b></li> <li>Some expressed <b>dissatisfaction</b> at not being able to take support with them to the appeal hearing</li> <li>Some stated panel was not independent enough of the Council and would mean that Senior Council Officers would be reviewing their own officers decisions and this would not result in a fair result.</li> </ul>		
<b>Proposal Seven</b> To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances	<b>Outcome of Consultation:</b> <ul style="list-style-type: none"> <li><b>The majority of consultees agreed with proposal</b></li> <li>Concerns around what 'appropriate' meant in practice and implications of a 'nearest appropriate' location being considered inappropriate by them</li> <li><b>Concern that this takes away parental choice</b></li> <li>Some people felt this proposal is a 'get out' clause for the Council to remove its legal responsibility to provide transport.</li> </ul>	<b>Agree to implement proposal:</b> To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances.	<b>Benefits</b> <ul style="list-style-type: none"> <li>Greater equality of implementation</li> <li>Increased efficiency of vehicle routes</li> <li>May result in potential cost efficiencies</li> </ul> <b>Risks:</b> <ul style="list-style-type: none"> <li>May result in more appeals</li> <li><b>This proposal could be subject to challenge through SEND tribunal</b> – a previous attempt to enforce this policy led to a tribunal where concerns about accessibility were raised.</li> </ul>
<b>Proposal Eight</b> To reaffirm that where individuals are eligible for	<b>Outcome of Consultation:</b> <ul style="list-style-type: none"> <li><b>Mixed response from consultees on proposal</b></li> </ul>	<b>Agree to implement proposal:</b> To reaffirm that where individuals are eligible for transport,	<b>Benefits:</b> <ul style="list-style-type: none"> <li><b>Greater equality of implementation</b></li> <li><b>Reduction in time pupils spend on transport</b></li> </ul>



## Appendix 3 – Summary of All Age Travel Assistance Policy Consultation response

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
transport, pick-up points will be used unless there are exceptional circumstances	<ul style="list-style-type: none"> <li><b>Concerns were expressed about where pick-up points are or would be</b>, if and how they would be <b>risk-assessed</b> to address any safeguarding issues</li> <li>Many people stated this proposal and statement was a good idea, would <b>prepare people for later life</b> and allow them to start developing more independence and integration in communities</li> <li>Some felt the use of pick-up points would <b>depend on the age and ability of the individual</b>; others noted this would be part of the Education and Health Care Plan and that would be part of the personalised assessment.</li> </ul>	pick-up points will be used unless there are exceptional circumstances	<ul style="list-style-type: none"> <li>Streamlining routes would be economically and environmentally beneficial</li> <li>May reduce pressure on internal fleet</li> <li><b>Could lead to decreased emissions</b></li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li>Mixed response in consultation to proposal, however it is recommended to implement</li> <li>May increase in number of appeals</li> <li><b>May lead to equalities implications and is dependent on their being a robust assessment process.</b></li> </ul>
<p><b>Proposal Nine</b></p> <p>The new policy aims to explain more clearly that parents are expected to accompany their children to school unless there are exceptional circumstances</p>	<p><b>Outcome of Consultation:</b></p> <ul style="list-style-type: none"> <li><b>Not supported by the majority of people responding to the questionnaire, although most people participating in focus groups understood it was clarifying the law and agreed it was a good idea</b></li> <li>Some people did ask why the Council needed to make this clarification; others seemed to think the Council was criticising those who are not able to take their children to school</li> <li>Some seemed to think they were being told they had to accompany their 17-year old or 18-year old teenagers to school when they would not want it, having already been encouraged to promote independence</li> <li>Some people also thought this meant that they should be accompanying their children when provided with Council transport.</li> </ul>	<p><b>Agree to implement proposal:</b> The new policy aims to explain more clearly that parents are expected to ensure their children get to school unless there are exceptional circumstances</p>	<p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li><b>Greater equality of implementation</b></li> <li>Improved ability to justify decisions when they are challenged</li> <li>Optimises the use of Council resource</li> </ul> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li><b>Results from consultation did not support proposal</b>, however, law requires parents/ carers to make sure their child receives a suitable education and getting their child to school is part of this</li> <li>Careful legal consideration would be needed of individual cases to ensure it was reasonable to expect a parent to accompany their child.</li> <li><b>There is a risk that this may disproportionately affect primary carers opportunities for employment.</b></li> </ul>



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## Equality Analysis

<b>Directorate:</b> Education  <b>Service Area:</b> Special Educational Needs and Disability	<b>Lead Officer:</b> Adrian Leach  <b>Date completed:</b>  <b>28/02/2020</b>
<b>Service / Function / Policy / Procedure to be assessed:</b> Delivering Independent Travel – Equality analysis of draft all age travel assistance policy following engagement and formal consultation on proposals	
<b>Is this:</b> New / Proposed <input type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input checked="" type="checkbox"/> (Please tick appropriate box)	<b>Review date:</b>  <b>28/02/2021</b>

### Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

#### What are the aims and objectives/purpose of this service, function, policy or procedure?

The Delivering Independent Travel Programme aims to provide a more personalised approach to the delivery of transport services (particularly those for SEND). It supports positive outcomes for children, young people, their parents, carers and guardians as well as adults themselves and aims to increase efficiencies within the provision of travel assistance without compromising service.

The proposals together develop a new All Age Travel Assistance Policy which would be more transparent, and person centred. Proposals include:

**Proposal One** - City of Wolverhampton Council's current Home to School Travel policy, Post-16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance policy

**Proposal Two** - The introduction of a personalised assessment process

**Proposal Three** - The introduction of charges for young people of sixth form age

**Proposal Four** - The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs

**Proposal Five** - To provide transport only from a single address unless there are exceptional circumstances

**Proposal Six** - To amend and clarify the application and appeals process for Home to School Travel Assistance

**Proposal Seven** - To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances

**Proposal Eight** - To reaffirm that where individuals are eligible for transport, pick-up points will be used unless there are exceptional circumstances

**Proposal Nine** - The new policy aims to explain more clearly that parents are expected to accompany their children to school unless there are exceptional circumstances

The policy would bring together the current Home to School Transport Policy, Post-16 Transport Statement and Adult Transport Protocol, which provide assistance to the following groups:

- Children and young people of pre-school age (2-4 years);
- Children under compulsory school age starting reception;
- Children of compulsory school age (aged between 5 and 16 years) with their travel from home to school or place of learning;
- Disabled children 0 -18 accessing social care or similar;
- Persons of sixth form age (aged between 16 to 18 and those continuing learners who started their programme of learning before their 19<sup>th</sup> birthday) to aid their attendance at school, college or place of learning
- Adult Learners
- Adults with care and support needs

**Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?**

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	✓	
Advancing equality of opportunity	✓	
Fostering good community relations	✓	

**If not relevant to any of the three equality duties and this is agreed by your Head of Service**, the Equality Analysis is now complete - please send a copy to the Equality & Diversity Team. **If any of the three equality duties are relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

## PART B: Full Equality Analysis.

### Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

<p><b>What outcomes are sought and for whom?</b></p>	<p>These proposals aim to support the development of independence, confidence and capacity for people to live independent lives and pursue paid employment, through offering a wider travel offer including independent travel training. Individual's applying for travel assistance will be assessed if they are appropriate to be travel trained, if so, they will receive a bespoke programme of travel training tailored to their needs which will be delivered by a travel trainer. During this programme they will learn and develop skills in order to travel independently to their educational establishment or social care venue.</p> <p>It also aims to increase efficiencies within the provision of travel assistance for the City of Wolverhampton Council without compromising service.</p>
<p><b>Are there any associated policies, functions, services or procedures?</b></p>	<ul style="list-style-type: none"> <li>• School admissions policy</li> <li>• Health and Safety policy</li> <li>• Safeguarding children policy</li> <li>• Corporate Complaints policy</li> <li>• Adult Social Care function</li> <li>• Sustainable Modes of Transport</li> </ul>
<p><b>If partners (including external partners) are involved in delivering the service, who are they?</b></p>	<p>Sandwell Council – Independent travel team who have developed and are successfully operating a policy equivalent to that described here.</p>

### Step 2 – What does the information you have collected, or that you have available, tell you?

**What evidence/data already exists about the service and its users?** (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

School census data which includes number of pupils by age, gender, ethnicity, free school meals. Responses from engagement activities carried out between February and April 2019. The Council also has analysed adult social care data which document who receives transport and also provides equality breakdown.

Our data has revealed that there is a stark gender imbalance as there is a higher proportion of boys that receive home to school transport than girls, which is in line with the national picture. The evidence so far suggests that fewer girls and young women receive transport. Despite this imbalance it has been recognised that this Equality Analysis does not deal with disparities in the initial assessment process for children and adults with additional needs, it simply looks at how best to provide travel options to for the existing customer base. The new policy will provide a detailed assessment of an individual's relevant travel support needs and this assessment will specifically include sections that will consider an individual's gender as well as an ability to consider their gender in the context of their wider equalities profile. As such we can expect gender imbalances to be better understood as the policy is used and to be able to demonstrate that the imbalance is not as a result of the policy but exogenous to it.

A higher percentage of pupils that receive transport have identified themselves as white British. For this reason, this analysis and the consultation work supporting it have sought specifically to find out how this policy can best support the requirements of eligible individuals from BAME backgrounds. The new policy will provide a detailed assessment of an individual's relevant travel support needs and this assessment will specifically include sections that will consider an individual's nationality or ethnicity etc.

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

### Background

A Corporate Transport Steering group was established in 2017 which emphasised that there was a need to widen the current travel offer and to maximise independence. As part of this work IMPOWER were commissioned and found that the Council's travel offer did not reflect its ambition of promoting independence.

A white paper was produced by the Wolverhampton Challenge Board in December 2017 to influence and shape the City's future priorities around special educational needs and disability. This highlighted that young people with special educational needs and disabilities wanted to learn how to travel independently and affirmed they wanted to be supported to do so. The resulting proposals, which taken together will contribute to the new all age travel assistance policy flow from these findings and from the resources the Council can deploy to meet the growing demand for assessment and support/advice.

Following this work a Delivering Independent Travel Board was established of which an integral programme outcome was the development of a consistent policy for travel assistance which would support vulnerable children and adults with additional needs to develop travel skills (if appropriate to do so) and become empowered to live more independent lives.

### Engagement

A series of pre-consultation engagement sessions that were held from February to April 2019, alongside a survey to shape the development of the draft All Age Travel Assistance Policy. Engagement was carried out with the following groups:

1. Children & young people
2. Adults with care and support needs
3. Parents & carers
4. Schools/colleges/Educational placement providers – SENCOs, Headteachers and Governing Bodies
5. Cabinet & Councillors
6. Internal Staff, including pupil services, passenger assistants, road safety, SENSTART, social care transport etc.
7. Public Transport provider (WM Travel)
8. Health Agencies
9. Trade Unions
10. Voluntary and community sector
11. Local Media

The Engagement sessions were facilitated by an external organisation, Results Communications, to ensure impartiality and were also commissioned to provide a final evaluation of engagement with has subsequently informed the draft policy.

### Formal Consultation 2 September – 29 November 2019

358 people participated in the public consultation through completion of a survey and attendance at 24 consultation focus groups

Parents/ Carers of pupils and adults in receipt of travel assistance received direct correspondence via post three times during consultation to inform that they may be directly impacted by consultation and changes that may arise from the All Age Travel Assistance Policy (subject to the approval of Cabinet). Pupils in receipt of bus passes also received a letter but this was sent 8 weeks into consultation as initially it was not recognised that this group would be affected, nonetheless, taking the advice of the Consultation Institute the Council wrote out to all parents/carers of pupils in receipt of council provided bus passes. The exercise did not sample the population of users then but directly and repeatedly contacted all service users.

Various methods of communication were used to promote the consultation including promotion in schools, colleges and day care centres, emails, posters, press releases, proposal summary document, accessible proposal summary document (co-produced with Voice4Parents &

Changing Our Lives) and survey and social media outlets. The materials were offered in different formats including versions of the document in large print, Braille, audio/CD and in other languages

### Consultation Focus Groups

There has been significant engagement with stakeholders across the lifespan of the consultation. The City of Wolverhampton Council have held over **24 consultation focus groups** across the city targeted at various stakeholders including pupils, parents & carers, adult service users and professionals and over **216 people have attended**. Please find below a summary of the sessions:

Audience	Sessions facilitated by	Number of sessions held	Number of attendees
Professionals	Results communication	3	29
Service users and families	Results communication	8	69
Adult Service Users	Changing our Lives & the Alzheimer's Society	6	51
Pupils	Nicola Harris SEND Support Officer	7	67
<b>Total</b>		<b>24</b>	<b>216</b>

City of Wolverhampton Council commissioned Results Communication to facilitate the sessions delivered to the public and to professionals to ensure impartiality, whilst Adult provider Service commissioned Changing our Lives and the Alzheimer's Society to facilitate sessions for Adult Service users to ensure the consultation focus groups were accessible and tailored to their needs. Their analysis can be found in appendix 2.

The consultation focus groups which were held in 7 special schools across the City of Wolverhampton were facilitated by the SEND Support Officer and supported by the Project Manager who worked closely with the schools to tailor each session according to the needs of the pupils, this included using technology and creating an interactive presentation.

There have been **117 responses** to the online survey and 25 responses received offline.

### Online

20 social media posts have been sent through the City of Wolverhampton Council's social media channels including twitter and Wolverhampton Today. These posts have been shared with Voice4parents, Wolverhampton Information and Advice Service, SENCOs and colleagues in health to share on their own channels to reach out to a wider audience.

### Equalities monitoring



The total number of Equal Opportunities Monitoring Forms returned, completed, was 147. A breakdown of equalities analysis can be found in Results Communications final evaluation report p.33 in appendix 2. However, a high-level overview presents that:

- Majority of respondents were aged 45-54
- Most identified as female
- Majority identified as straight
- High number of respondents identified as white British
- Majority identified as Christian
- There was a high number of respondents that identified as having a disability

### **Additional meetings**

The Draft All Age Travel Assistance Policy consultation has been presented and discussed in a range of internal and external meetings with various stakeholders. These meetings have been used as an opportunity to request partners to share the consultation more widely with their partners and interested groups or individuals in the community. The meetings are outlined below:

- Wolverhampton Equality and Diversity Partnership Board
- School Governors Forum Autumn term update
- SENCO Forum
- SEND and Commissioning Partnership Board
- Adult Leadership Team
- Voice4parents Steering Group
- Workshops to Private Voluntary Independent nurseries and LA nurseries

### **Consultation Institute**

The Consultation Institute was commissioned to provide ongoing support and advice throughout the life time of the consultation. They have provided an extra layer of assurance to ensure the consultation has been conducted fairly and robustly. The Consultation Institute conducted a mid-point review of the consultation which ascertained the extent to which the dialogue methods being used were successfully engaging the identified groups and individuals. They suggested in this mid-consultation review meeting that there was an imbalance of number of BAME respondents and identified that further work needed to be completed to ensure that people from BAME backgrounds had opportunity to engage in the survey. Several actions emerged from the meeting to meet separately with Wolverhampton Ethnic Minority Council, which was completed, and a response was captured. Additionally, it was suggested to reach out to a local third sector organisation specialising in SEND and equalities issues, "Include me too", however, due to their own commitments CWC were unable to arrange a meeting despite several attempts to engage with this group.

Additionally, they reviewed the final evaluation report provided by Results Communication which established that the Consultation Institute were satisfied with the final output report, however, made some suggestions to strengthen the analysis which resulted in Results Communication producing a second issue of their final evaluation report which provided greater clarity.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

No formal complaints were made about the consultation; however, 10 emails were received of which some expressed concern regarding consultation and frustration that the council was attempting to make savings by making changes to the current policy. Some concerns were expressed by one person about participants not being listened to, that more talking was being done by the facilitator and that comments being made by participants were countered during the workshop they attended.

The concerns raised were provided in comment on the workshop materials, and in an email to the Head of Service, who subsequently arranged a meeting with the originator of the comments and the facilitator, as well as other council employees present at the time.

Wolverhampton Information Advice and Guidance Service (IASS) identified some concerns within its questionnaire response against specific proposals. One concern was raised about the consistency of the Easy Read version of the questionnaire. The Council are aware this consultation has been the subject of Advice and Guidance by The Consultation Institute, but the Council are not privy to the guidance given in relation to consultation materials including information and questionnaires. Of note, however, is that none of the responses to the consultation have been received in the Easy Read format.

Please find below a summary of the outcome of consultation and further detail can be found in section 3 of this report which will explicitly detail the benefits and risks:

Proposal description	Outcome of Consultation
1. City of Wolverhampton Council's current Home to School Travel policy, Post-16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance policy	Results from consultation support the proposal to have one combined All Age Travel Assistance Policy
2. The introduction of a personalised assessment process	Results from consultation support proposal to introduce a personalised assessment process, however, further clarity around what the assessment process would look like is required
3. The introduction of charges for young people of sixth form age	Results from consultation do not support the implementation of this proposal
4. The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs	Results from consultation support proposal

5. To provide transport only from a single address unless there are exceptional circumstances	Results from consultation support proposal to provide transport from one single address (with an equalities concern that has been addressed as a result of this EA work following consultation)
6. To amend and clarify the application and appeals process for Home to School Travel Assistance	Results from consultation support proposal
7. To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances	Results from consultation presented a mixed reaction, although the majority supported the proposal
8. To reaffirm that where individuals are eligible for transport, pick-up points will be used unless there are exceptional circumstances	Results from consultation presented a mixed response to proposal, (with an equalities concern that has been addressed as a result of this EA work following consultation)
9. The new policy aims to explain more clearly that parents are expected to accompany their children to school unless there are exceptional circumstances	Results from consultation do not support the implementation of this proposal

### Step 3 – Identifying the negative impact.

#### a. Is there any negative impact on individuals or groups in the community?

	<p><b>Barriers:</b></p> <p>What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:</p> <ul style="list-style-type: none"> <li>• <b>Where</b> you provide your service, e.g. the facilities/premises;</li> <li>• <b>Who</b> provides it, e.g. are staff trained and representative of the local population/users?</li> <li>• <b>How</b> it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?</li> <li>• <b>When</b> it is provided, e.g. opening hours?</li> <li>• <b>What</b> is provided, e.g. does the service meet everyone's needs? How do you know?</li> </ul>
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<p>* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.</p> <p><b>Solutions:</b></p> <p>What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:</p> <ul style="list-style-type: none"> <li>• Other arrangements that can be made to ensure people's diverse needs are met;</li> <li>• How your actions might help to promote good relations between communities;</li> <li>• How you might prevent any unintentional future discrimination.</li> </ul>			
<p><b>Proposal One</b> City of Wolverhampton Council's current Home to School Travel policy, Post-16 Travel statement and Adult Social Care Transport protocol would be combined into a single All Age Travel Assistance policy</p>			
<p><b>Equality Themes</b> The information below is from the various consultation meetings undertaken and from the correspondence of the emails</p>	<p><b>Positive Impacts</b></p>	<p><b>Negative Impacts identified</b></p>	<p><b>Solutions</b> (ways in which you could mitigate the negative impact)</p>
<p><b>Age</b> (including children, young people and older people)</p>	<ul style="list-style-type: none"> <li>• Majority of consultees were in favour of this proposal</li> <li>• Policy will be clearer and easy to understand</li> <li>• Will improve transition between child and adult services</li> <li>• Joint planning and commissioning services may provide a better use of resources and a more joined up approach to provision</li> <li>• Consultees highlighted that the policy must be in plain English, and available in alternative language, Easy Read, Braille and Audio formats. A version</li> </ul>	<ul style="list-style-type: none"> <li>• Some other Local Authorities have faced legal challenges if policies are difficult for the average parent to understand</li> <li>• Concern that combined policy will mean 'one size' fits all will need address specific individual needs</li> <li>• Having one policy would streamline the offer, it also presents a potential risk where the specific needs of particular groups could be overlooked</li> <li>• If changes need to be made the entire policy would need to be reviewed -</li> </ul>	<ul style="list-style-type: none"> <li>• The Council has ensured that the policy is clear and easy to understand. A project working group has been established to develop the policy, which includes representatives from equalities, legal, assurance, travel unit and SEND</li> <li>• An accessible version of the policy will be co-produced with partners which will be completed when the policy is implemented through a phased approach from April 2020</li> <li>• The Council has ensured the policy is clear and addresses</li> </ul>

	could also be made available for children and young people.	this again may risk and effect a lot of services for a lot of people.	<p>circumstances that travel assistance will be provided for each age group, as well as those that have special education needs and/ or disabilities</p> <ul style="list-style-type: none"> <li>It is not necessarily the case that a change would requires the complete review of policy and much effort has been expended to ensure that the policy as a whole is robust, as accessible as resources allow and legally compliant so that no changes are necessary.</li> </ul>
<b>Disability</b> (including carers)  Page 91	None specifically identified via engagement, formal consultation or other routes.	Some consultees said during consultation that individuals with disabilities should be assessed on ability not age.	<ul style="list-style-type: none"> <li>The Council has ensured the policy is clear and addresses circumstances that travel assistance will be provided for each age group, as well as those that have special education needs and disabilities. Assessments will be centrally considering the abilities of those that come within its purview and will not make blanket age-related recommendations</li> </ul>
<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	The EA notes above that there are more boys than girls in receipt of the services and this has been the subject of discussion throughout the general as well as engagement and consultation work. This does not appear to be for an equalities related reason even if there is a disparity.	<ul style="list-style-type: none"> <li>This finding chimes with national research and service delivery. The resulting services created by the new policy will be monitored against all of the equalities requirements and this question will be considered at various points in the planned reviews of the policy's operation</li> </ul>
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Children of divorced parents</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

### Proposal Two: The introduction of a personalised assessment process

<b>Equality Themes</b> The information below is from the various consultation meetings undertaken and from the correspondence of the emails	<b>Positive Impacts</b>	<ul style="list-style-type: none"> <li><b>Negative Impacts identified</b></li> </ul>	<b>Solutions</b> (ways in which you could mitigate the negative impact)
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<b>Age</b> (including children, young people and older people)	<ul style="list-style-type: none"> <li>Where appropriate, the proposals offer an opportunity to adopt a more personalised and empowered approach to travel assistance</li> <li>It offers the opportunity to develop independent living skills and enhances transition from children to adult services and independent life.</li> </ul>	<ul style="list-style-type: none"> <li>Concerns were expressed that the assessment appeared to be more focused on age rather than ability</li> <li>During consultation concerns were made about safety and travelling independently could be a risk to vulnerable children</li> <li>Concern about what age a child would receive independent travel training</li> <li>Some concerns need to look at the barriers of what is preventing a person from travelling independently; i.e. bullying etc.</li> </ul>	<ul style="list-style-type: none"> <li>Implementation will be carefully considered for individuals on an annual basis and assessments will specifically centre on ability in the broadest context of equalities</li> <li>The Council will ensure there is a robust assessment process in place and that independent travel training is only offered when it is appropriate – considering all relevant equalities protected characteristics</li> <li>Make sure there is a robust risk assessment completed when a child is identified as being able to travel train. NB the Equality Act provides for children to be treated differently in relation to age and this does not constitute age discrimination</li> <li>Equip children with tools and resilience about how to deal with bullying when learning to travel independently and specifically in relation to bullying etc. that might be aggravated by equalities issues alongside others. Review in light of experience.</li> </ul>
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>The promotion of independence increases confidence and enables individuals to access more social, educational and employment opportunities</li> <li>Feedback from engagement suggests our citizens would welcome greater personalisation freedom and flexibility for families to make</li> </ul>	<ul style="list-style-type: none"> <li>Feedback during consultation stated that SEND children should be assessed by ability and not age</li> <li>People were concerned about public transport and the risk/safeguarding issues raised</li> </ul>	<ul style="list-style-type: none"> <li>Implementation will be carefully considered for individuals on an annual basis and assessments will specifically centre on ability in the broadest context of equalities</li> <li>Make sure independent travel training programme includes a robust risk assessment that can be shared with parents and carers to provide assurance which centrally includes detailed</li> </ul>



	<p>travel arrangements that best meet their family's needs and circumstances</p> <ul style="list-style-type: none"> <li>• During consultation the idea of independent travel training was welcomed as long as it is discussed by all involved in the provision of care and support of the individual being assessed, and that it was only introduced if appropriate and after the individual had successfully completed training.</li> </ul>	<ul style="list-style-type: none"> <li>• Some consultees expressed concern around how people would deal with uncertainties of late transport, changes to timetables.</li> <li>• Additionally, some asked about how travel training would work for some conditions, such as blindness, hearing impairment, etc., and how these would be addressed within the training packages.</li> <li>• Issues raised that unable to get more than two wheelchairs on the bus, so some people may be unable to travel with another person that is disabled.</li> <li>• Worries about bullying and increased vulnerability.</li> <li>• Concern about if travel training is offered and then the individual or parent/ carers refuses to participate then travel assistance would not be offered</li> </ul>	<p>consideration of equalities related risks</p> <ul style="list-style-type: none"> <li>• Make sure independent travel training includes an in-depth Programme of training so individuals are prepared for unforeseen circumstances and which relates to individual impairments so that these can be understood in the context of the service provided and so of course that reasonable adjustments can be made</li> <li>• Ensure that independent travel training programme can be adapted for all disabilities, to promote independence for all. Many people with visual impairments travel independently as a result of the training to be supplied by this policy</li> <li>• Raise to transport providers that consideration should be made for providing more wheelchair space on board buses</li> <li>• Make sure independent travel training programme equips individuals with skills and tools of how to deal with bullying or any other issues that may arise whilst independently travelling (see above)</li> <li>• This is not an equalities issue but the implications of non-compliance will be made clear in an accessible way.</li> <li>• Clearly the LA will want to be sensitive to supporting sibling groups but these issues per se</li> </ul>
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		<ul style="list-style-type: none"> <li>Many consultees stated that siblings should be taken into consideration in the assessment process for travel assistance.</li> </ul>	<p>are not directly related to equalities protected characteristics and therefore protected by the Equality Act 2010. Service reviews will need to be sensitive though to the possibility of siblings being more likely to come from some BAME backgrounds and that any adverse impact is not therefore related to ethnicity.</p>
<b>Gender</b> (men and women)		<ul style="list-style-type: none"> <li>The Council recognises girls and young women may be more targeted to abuse on public transport in relation to the gender more than their disability.</li> </ul>	<ul style="list-style-type: none"> <li>Travel training will include an element to support girls and young women to ensure they are equipped to handle situations of harassment if they arise.</li> </ul>
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)		<ul style="list-style-type: none"> <li>During consultation it was raised that English as a second language presents barriers to accessing travel assistance</li> <li>Concerns around assessments being conducted at the desktop, via phone and not in person</li> <li>Some concerns expressed that the way the application process is at the moment will lead to limited take-up by BAME people because it is too complex and not easily accessible</li> <li>Concerns around an online assessment form and that this may exclude some BAME communities from accessing travel assistance as some communities do not have strong ICT skills.</li> </ul>	<ul style="list-style-type: none"> <li>The council has worked to make sure that the policy is in plain English and easy to understand. Ensure that this issue is captured and acted up on in the assessment process and that it informs the level of risk accorded to a journey or individual</li> <li>The Council has made sure the policy is available in other formats, including other languages, larger print and braille</li> <li>The Council has worked to ensure the assessment process is carried out in a way that can elicit the necessary information from those involved in a way that is accessible to them</li> <li>The Council has made sure there are alternative ways that individuals can apply for travel assistance, include paper</li> </ul>

			versions of the online referral form and make available in other accessible formats. The Council offers support to complete applications for travel assistance.
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	<ul style="list-style-type: none"> <li>This was not apparent in consultation, however, this needs to be recognized. The Council recognise that individuals from particular faith groups may be more susceptible to religious discrimination, prejudice or harassment, such as Anti-Semitism or Islamophobia.</li> </ul>	<ul style="list-style-type: none"> <li>Travel training will include an element to support individuals to deal with religious discrimination, prejudice or harassment because of their religious beliefs. The Council will also consult with 'Include me too' about how we will work to address any emerging issues relating to harassment or discrimination because of religion or belief</li> </ul>
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)		<ul style="list-style-type: none"> <li>This was not specifically raised during consultation, however, we recognise that individuals undergoing or having undergone gender reassignment may be more vulnerable and susceptible to bullying and harassment on public transport.</li> </ul>	<ul style="list-style-type: none"> <li>Travel training will include an element to support individuals to deal with any harassment because of gender reassignment.</li> </ul>
<b>Pregnancy and Maternity</b>		<ul style="list-style-type: none"> <li>This was not raised during the lifespan of consultation; however, it is acknowledged that a customer who is pregnant may at some points in their pregnancy receive, what in the absence of alternative support may be unfavorable treatment. This would also apply to a pregnant parent of a child supported by travel assistance.</li> </ul>	<ul style="list-style-type: none"> <li>During the personalised assessment of an individual accessing travel assistance who is pregnant, arrangements will be considered and possible adjustments made for the relevant period where this is an issue requiring these.</li> </ul>
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	<ul style="list-style-type: none"> <li>This was not raised during consultation, however, this proposal is being implemented during a period when homophobic and</li> </ul>	<ul style="list-style-type: none"> <li>Participants will be asked to reflect on and suggest methods by which any person travelling independently who may be LGBT or perceived to be can deal with</li> </ul>

		transphobic hate crime is increasing.	the potential for this. That is, it will form part of the travel training offered. In some cases, young people may not be sure of their sexual orientation and CWC will be offering support to people questioning their sexual orientation.
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	Having a range of travel options personalised and maximize a person's independence would enhance a person's human rights.	<ul style="list-style-type: none"> <li>This may negatively what carers may deem as their human rights because they will have possibly more responsibility but also giving greater choice and control to the individuals.</li> <li>Right to private and family life.</li> </ul>	<ul style="list-style-type: none"> <li>The All Age Travel Assistance Policy takes into consideration the 'circumstances' affecting the individual's parent/ carers which prevents them, getting to and from an educational establishment or social care venue</li> <li>This will be captured in the assessment form for travel assistance</li> </ul>
<b>Children of divorced parents</b>		The Council recognises that a policy which collects children from one address only could provide a lower level of service to children and to parents of children who no longer share a home due to divorce or separation.	This issue will be considered as part of the personalised assessment process.

### Proposal Three: The introduction of charges for young people of sixth form age

Equality Themes The information below is from the various consultation meetings undertaken and from the correspondence of the emails	Positive Impacts	<ul style="list-style-type: none"> <li>Negative Impacts identified</li> </ul>	Solutions (ways in which you could mitigate the negative impact)

<p><b>Age</b> (including children, young people and older people)</p>	<ul style="list-style-type: none"> <li>Some consultees stated that a contribution would be appropriate to help towards their transport provision</li> <li>Students at age 16 and over should contribute to their education costs including travel. This will help them to gain an understanding of finances and how to manage their money.</li> </ul>	<ul style="list-style-type: none"> <li>Concerns that may prevent 16-19-year old's accessing education</li> <li>Issue that travel assistance would become free again aged 19 if pupil transfers to Adult Social Care</li> <li>Children that do not have SEND do not pay this amount for the travel and is unfair on individuals with SEND</li> <li>Young people with SEND requires as many barriers to learning being lifted as possible. Charging for further education travel does not do this</li> <li>A lot of consultees expressed that it is compulsory for young people to stay in education until they are 18 - young people and families should not have to pay for travel</li> <li>When EHCPs were extended for young people up to 25 years, the government's aim was to make it possible for disabled people to access education for a longer period, however, paying for transport prevents this.</li> </ul>	<ul style="list-style-type: none"> <li>The council will ensure that 16-19-year olds and their parents and carers are aware that they can access a 16-19 bursary that can be used to pay for a contribution to transport</li> <li>Highlight that this ensures there is a consistent approach for all young people aged 16-19</li> <li>The Council had made clear in the policy that despite the age of participation in education has been raised until 18 that the council do not have a statutory duty to provide travel assistance for 16-19-year old's so legislation is clear</li> <li>The Government's aim has been contemporary with the need for LA's to operate on greatly reduced budgets. The charge here will allow the Council to meet the growing demand for SEND support. The charge for a small number of disabled people will allow therefore, across the cohort as a whole for the greatest number of disabled people to get the greatest amount of help available; with the Council's resources as they are at present</li> </ul> <p>NB The Equality Act does not protect people younger than 18 from age related discrimination as it is seen to be possible and, in many cases, desirable to offer</p>
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			different treatments to people who are less than 18.
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>Some consultees stated that paying a contribution to a welfare vehicle is better than getting public transport.</li> </ul>	<ul style="list-style-type: none"> <li>Overall most consultees did not agree with imposing a charge for 16-19 transport, stating it should be free</li> <li>Comments made that charges should be more in line with what mainstream children pay to get to school (e.g. same rate as 16-19 bus pass)</li> <li>May prevent individuals with disabilities from accessing transport</li> <li>Charges may more adversely affect families where there is a child with a disability. People with disabilities in their families are already financially disadvantaged and may make the family unit more vulnerable</li> <li>Comments made that individual with a disability might be seen as a burden within the family setting.</li> </ul>	<ul style="list-style-type: none"> <li>The Council will ensure that 16-19-year olds and their parents and carers are aware that they can access a 16-19 bursary that can be used to pay for a contribution to transport</li> <li>Highlight that this ensures there is a consistent approach for all young people aged 16-19</li> <li>The proposed charges during consultation have been reduced to £600 and £300 (pupils from low income family's low income) which is in line with the Council's statistical neighbor Walsall and will not be implemented until September 2021, which allows individuals and families more time to prepare for incoming charges (subject to Cabinet approval)</li> <li>The Council has made clear in the policy that despite the age of participation in education has been raised until 18 that the council does not have a statutory duty to provide travel assistance for 16-19-year old's so legislation is clear</li> <li>Pupils aged 16-19 from low-income families will pay a reduced contribution rate to travel assistance. Access to 16-19 bursary that all pupils with SEND are entitled to can be used to pay for transport</li> </ul>

			<ul style="list-style-type: none"> <li>Paying a reduced rate helps alleviate risk of the individuals being viewed as a burden.</li> </ul>
<b>Gender</b> (men and women)	Please see details in step 2.	None specifically identified via engagement, formal consultation or other routes.	
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	None specifically identified via engagement, formal consultation or other routes.	<ul style="list-style-type: none"> <li>Some consultees questioned what is regarded as 'low income', and the impact this could have on a family's finances as well as on young people's opportunities from low income families to access further education post-16</li> <li>Some people said imposing a charge was unfair as it isn't the fault of children and young people requiring travel assistance</li> <li>Some people expressed dissatisfaction that some families are</li> </ul>	<ul style="list-style-type: none"> <li>Offer a decreased rate for 16-19-year olds from low income families to make a contribution to their transport NB Income is not a protected characteristic under the Equality Act 2010</li> <li>The Council has clarified in the policy what constitutes low-income (see above)</li> <li>The Council will make families aware of 16-19 bursary which can</li> </ul>



		<p>receiving support to provide travel in both benefits and through mobility vehicle arrangements and are also being provided with free transport by the council for their child or young person</p> <ul style="list-style-type: none"> <li>Some stated that this would have a more adverse effect on single parent families and other parents on minimum wage that may be discouraged from letting their children attend sixth form.</li> </ul>	<p>be accessed to pay for transport to sixth form. Although these are issues, they are not expressed here as this document outlines equalities issues and will be dealt with elsewhere. Disability can impact on a disabled individual's income and this is the reason for the mitigation described above "decreased rate for pupils aged 16-19</p> <ul style="list-style-type: none"> <li>The Council have taken into consideration the feedback from consultation and reduced proposed charing to £600 and £300 (pupils from low income family's low income). This is only a contribution towards travel assistance and the Council will meet the remaining total cost.</li> </ul>
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Proposal Four: The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs			
Equality Themes The information below is from the various consultation meetings undertaken and from the correspondence of the emails	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
<b>Age</b> (including children, young people and older people)		<ul style="list-style-type: none"> <li>There may be disruption to the routine of this cohort of children and young people, some of whom may be at high risk of disengaging from the education system.</li> </ul>	<ul style="list-style-type: none"> <li>This is a concern only at present and the monitoring arrangements being put in place will be under rigorous review to see if this is a concern only or transpires; In case remedial action will be</li> </ul>

			taken to address any equalities related aspects of this policy change
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>Promotes and maximises the independence of all children and young people, enabling pupils with SEMH to access independent travel training</li> <li>Ensures there is a clear and consistent process for all individuals applying for travel assistance</li> <li>Ensures that pupils with SEMH needs are not labelled.</li> </ul>	<ul style="list-style-type: none"> <li>In consultation some felt this proposal was penalising people with SEMH needs, and that by removing this automatic eligibility the council would be ignoring those needs</li> <li>Some consultees expressed there are already enough barriers to identifying and helping pupils with SEMH. Removing automatic travel assistance is hindering not helping</li> <li>Children with these needs need consistency and reassurance. They are vulnerable and their individual needs are extremely complex</li> <li>Pupils with SEMH are not like “other pupils” especially if they have an EHC Plan and attend a specialist placement for these issues</li> <li>This could surmount in safeguarding issues if pupils with SEMH needs are not transported.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure the assessment process is robust and fair.</li> <li>Make sure the assessment process is clear and easy to understand</li> <li>Providing for a single approach brings, clarity and simplicity and may remove some of the stigma that remains in the UK for this group of children and young people</li> <li>The new policy provides for consistency</li> <li>The assessment process will be an individual process to support the vast range of impairments that will trigger eligibility</li> <li>The policy will be rigorously monitored for this outcome and remedial action will be taken if this outcome transpires.</li> </ul>
<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Children of divorced parents</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

#### Proposal Five: To provide transport only from a single address unless there are exceptional circumstances

<b>Equality Themes</b> The information below is from the various consultation meetings undertaken and from the correspondence of the emails	<b>Positive Impacts</b>	<b>Negative Impacts identified</b>	<b>Solutions</b> (ways in which you could mitigate the negative impact)
<b>Age</b> (including children, young people and older people)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>Will lead to better route planning, reduced journey times and changes in routes that more adversely impact on individuals with SEND, as</li> </ul>	<ul style="list-style-type: none"> <li>Recurring questions and concerns during consultation around what constitutes as a 'exceptional circumstance' and if respite care was an exceptional circumstance.</li> </ul>	<ul style="list-style-type: none"> <li>The Council has clarified what exceptional circumstances are in the policy and that respite will be considered as an exceptional circumstance</li> </ul>

	during consultation it was raised that sudden changes in routes can cause confusion and stress to individuals who rely on a routine.	<ul style="list-style-type: none"> <li>Concerns were expressed that this proposal provided no flexibility for changing circumstances;</li> <li>May prevent individuals from accessing other activities e.g. after school clubs.</li> </ul>	<ul style="list-style-type: none"> <li>There is some flexibility in that the responsible adult can change the address for pick-up and that if a child is “ordinarily resident” at two addresses this will be accommodated</li> <li>This is a concern and the reality of this will be considered as the policy is operated to allow for review in this aspect.</li> </ul>
<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Race</b> (including Gypsies and Travellers and Asylum Seekers)	None specifically identified via engagement, formal consultation or other routes.	People using transport from changing traveler sites may be affected.	This is an issue of a changing but single site pick up and can be addressed from within the current policy. Numbers are likely to be small and so can be accommodated from within the exceptional circumstance clause of the policy if required.
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>		<ul style="list-style-type: none"> <li>The authority recognises that a policy which collects children from one address only could provide a lower level of service to children and to parents of children who no longer share a home due to divorce or separation</li> <li>Consideration of foster families.</li> </ul>	<ul style="list-style-type: none"> <li>The Council has clearly highlighted in policy what exceptional circumstances an individual would be transported to another address that is not their 'home' address</li> <li>This is not directly an equalities issue although the equalities profile of those children receiving foster care may be very different to the population as a whole. Monitoring of service user via all equalities protected characteristics will be undertaken and any significant disparities reviewed for remediating actions.</li> </ul>
<b>Children of divorced parents</b>		<ul style="list-style-type: none"> <li>Concerns have been during consultation that implementing this policy would have a far more significant impact on children whose parents have separated, or individuals being cared for at multiple addresses.</li> </ul>	<ul style="list-style-type: none"> <li>Children "ordinarily resident" at two addresses may be accommodated in accordance with the policy</li> <li>The policy is intended to transport the most disabled children to school via the quickest route to best support all of the children's learning</li> <li>The policy contains the caveat that this aspect of the position can be considered in "exceptional circumstances" – and these will be reviewed in the light of the policy's operation to check on and potentially remediate any adverse equalities impact apparent from equalities monitoring.</li> </ul>

Proposal Six: To amend and clarify the application and appeals process for Home to School Travel Assistance			
Equality Themes The information below is from the various consultation meetings undertaken and from the correspondence of the emails	Positive Impacts	<ul style="list-style-type: none"> <li>Negative Impacts identified</li> </ul>	Solutions (ways in which you could mitigate the negative impact)
<b>Age</b> (including children, young people and older people)		<ul style="list-style-type: none"> <li>Discontinuity if adults have a different appeal process and may cause confusion.</li> </ul>	<ul style="list-style-type: none"> <li>Clear and accessibly outline the application and appeals process for children's and adults in the final policy.</li> </ul>
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>A wholly independent and transparent appeals process would provide parental confidence that the process is fair.</li> </ul>	<ul style="list-style-type: none"> <li>Medical professional needed on the panel</li> <li>The panel should comprise of individuals that have experience of special educational needs</li> <li>Concerns if parents have learning difficulties and cannot navigate this system.</li> </ul>	<ul style="list-style-type: none"> <li>The Council will clarify in the appeals process that parent/ carer can bring whatever supporting information they consider appropriate, as well as the choice to bring anyone (with the exception of a professional from the school) to support them</li> <li>The authority will continue to support its Information Advice and Support Services for this purpose.</li> </ul>
<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)		<ul style="list-style-type: none"> <li>Concerns about ethnic make up of the panel and a need for it to be diverse.</li> </ul>	<ul style="list-style-type: none"> <li>Panels will be diverse and key actions will be taken to ensure the pool of people from which panels are chosen is monitored for its diversity and any necessary recruitment action will be taken to provide for diverse panels</li> <li>All individuals on the interview panel to have completed unconscious bias training</li> </ul>

			<ul style="list-style-type: none"> <li>To make groups in the community aware of recruitment to travel assistance appeals panel.</li> </ul>
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	Operating an accessible appeal process that is cognizant of diversity issues also underpins Article 6 the right to a fair trial.	None specifically identified via engagement, formal consultation or other routes.	
<b>Children of divorced parents</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

**Proposal Seven: To reaffirm that travel assistance is only provided to the nearest appropriate educational establishment or social care venue unless there are exceptional circumstances**

<b>Equality Themes</b> The information below is from the various consultation meetings undertaken and from the	<b>Positive Impacts</b>	<b>Negative Impacts identified</b>	<b>Solutions</b> (ways in which you could mitigate the negative impact)



correspondence of the emails			
<b>Age</b> (including children, young people and older people)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>Ensures there is a fair and consistent to all applying for travel assistance.</li> </ul>	<ul style="list-style-type: none"> <li>This proposal could be subject to challenge through SEND tribunal – a previous attempt to enforce this policy led to a tribunal where concerns about accessibility were raised</li> <li>Individuals were concerned about what ‘appropriate’ means and were worried about the implications of a ‘nearest appropriate’ location being considered inappropriate by them because of bullying issues, or other causes for concern</li> <li>May have other children at different schools which impacts them being able to take children to school if did not receive travel assistance.</li> <li>Some perceived a limiting parental choice and concerns that individuals with disabilities have a much narrower choice than others that are non-disabled.</li> </ul>	<ul style="list-style-type: none"> <li>The Council has clearly defined the “nearest appropriate educational establishment” and “social care venue” in the final policy</li> <li>Ensure equalities in its widest sense is an integral part of assessments as to how an educational or social care venue is considered appropriate</li> <li>The Council has clearly stated how the circumstance of other close family members will be considered when assessing for travel assistance</li> <li>The Council will act in the best interests of the child within the parameters set by public purse requirements.</li> </ul>
<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)		<ul style="list-style-type: none"> <li>Concerns that culturally, the nearest suitable or day care centre may not be appropriate</li> </ul>	<ul style="list-style-type: none"> <li>Ensure equalities in its widest sense is an integral part of individual assessments as to how an educational or social care venue is considered “appropriate”</li> </ul>

		<ul style="list-style-type: none"> <li>Concerns that 'nearest appropriate' locations being away from their home communities and the ability of the individual to be part of their community and become familiar with it</li> <li>Concerns raised during consultation that people who are BAME are at more of a disadvantage if it isn't the right choice, refreshments at that particular establishment may not cater to cultural needs and this needs to be taken into consideration.</li> </ul>	<p>to deal with these considerations</p> <ul style="list-style-type: none"> <li>Ensure equalities in its widest sense is an integral part of individual assessments as to how an educational or social care venue is considered "appropriate" to deal with these considerations</li> <li>Ongoing review of the equalities analysis which will assess how the policy impacts individuals from BAME backgrounds.</li> </ul>
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Children of divorced parents</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

<b>Proposal Eight: To reaffirm that where individuals are eligible for transport, pick-up points will be used unless there are exceptional circumstances</b>			
<b>Equality Themes</b> The information below is from the various consultation meetings undertaken and from the correspondence of the emails	<b>Positive Impacts</b>	<b>Negative Impacts identified</b>	<b>Solutions</b> (ways in which you could mitigate the negative impact)
<b>Age</b> (including children, young people and older people)	<ul style="list-style-type: none"> <li>Reduction in time pupils spend on transport.</li> </ul>	<ul style="list-style-type: none"> <li>Some felt the use of pick-up points would depend on the age of the individual</li> <li>8 years old considered by some as too young to walk to a pick-up point.</li> </ul>	<ul style="list-style-type: none"> <li>The Council will clarify the age of which pick-up points would be considered and that these will always be considered in the context of an individual child or older person's abilities. (see below) NB the Equality Act allows for different treatment of children without this constituting Age discrimination. Equality Act.</li> </ul>
<b>Disability</b> (including carers)	<ul style="list-style-type: none"> <li>Many people stated this proposal and statement was a good idea, would prepare people for later life and allow them to start developing more independence and integration in communities.</li> </ul>	<ul style="list-style-type: none"> <li>Concerns were expressed about where pick-up points are or would be, if and how they would be risk-assessed to address any safeguarding issues</li> <li>Dependent on ability of individual and a personalised assessment process is required</li> </ul>	<ul style="list-style-type: none"> <li>Ensure the policy is clear that robust risk assessments will be completed before a pick-up point is implemented</li> <li>Ensure there is a robust assessment process in place that identifies individuals that could</li> </ul>

		<ul style="list-style-type: none"> <li>• Adverse weather may affect individuals with disabilities more e.g. snow and if individual needs a walking aid</li> <li>• Concerns that pick-up points would place vulnerable people at risk in public places</li> <li>• During consultation concerns were expressed that pupils at SEN Schools have complex needs and can pick up illnesses more easily. It was stated that being outside at a pick -up point might make people with disabilities more susceptible to catching illnesses such as colds</li> <li>• Concerns around accompanying children to a pick-up point when parents/ carers need to get their other children to school. Also, concerns around circumstances if parent or carer is unwell and cannot accompany them</li> <li>• Comments that bus stops are known to be places where adults with learning disability can be bullied; bus stops might not be a safe place for people to be picked up</li> <li>• Concerns this may result in anxiety and stress</li> <li>• Comments about dark nights and appropriateness of individuals with disabilities walking home.</li> </ul>	<p>use pick-up points where appropriate to do so</p> <ul style="list-style-type: none"> <li>• Clearly state in the policy what would happen in adverse weather conditions.</li> <li>• Ensure there is a robust assessment process in place that identifies individuals that could use pick-up points where appropriate to do so</li> <li>• Ensure there is a robust assessment process in place that identifies individuals that could use pick-up points where appropriate to do so</li> <li>• The policy sets out that it will take into consideration the health needs/ disability/ circumstances affecting the individual's parents/ carers which works to mitigate this risk</li> <li>• Assessment and training will include coping strategies to assist a person deemed able to travel in this way, in the event of bullying</li> <li>• Only those considered able to travel in this manner will be recommended so to do following detailed assessment.</li> </ul>
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<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	Some of the concerns raised above re disability could also apply to women and girls.	The assessment process is intended to equip girls and women with coping and other strategies to help them deal with situations described above. The system is operating successfully in other parts of the UK and in neighbouring authorities but there is a planned review of the policy's operation included in the Action Plan below and this can consider any issues that become apparent.
<b>Race</b> (including Gypsies & Travelers and Asylum Seekers)	None specifically identified via engagement, formal consultation or other routes.	Some of the concerns raised above re disability could also apply to people from BAME backgrounds where this is apparent in public spaces or where this is perceived to be the case by those harassing or whose behaviour is unwanted or more to the individual or individuals concerned here.	The assessment process is intended to equip people from BAME backgrounds with coping and other strategies to help them deal with situations described above. The system is operating successfully in other parts of the UK and in neighbouring authorities but there is a planned review of the policy's operation included in the Action Plan below and this can consider any issues that become apparent.
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	Some of the concerns raised above re disability could also apply to people whose faith is apparent in public spaces where this is apparent in public spaces or where this is perceived to be the case by those harassing or whose behaviour is unwanted or more to the individual or individuals concerned here.	The assessment process is intended to equip people whose faith is apparent in public spaces with coping and other strategies to help them deal with situations described above. The system is operating successfully in other parts of the UK and in neighbouring authorities but there is a planned review of the policy's operation included in the Action Plan below and this can consider any issues that become apparent.
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	Some of the concerns raised above re disability could also apply to people from trans communities where this is apparent in public spaces or where this is perceived to be the case by those harassing or whose behaviour is unwanted or more to the individual or individuals concerned here.	The assessment process is intended to equip people from trans communities with coping and other strategies to help them deal with situations described above. The system is operating successfully in other parts of the UK and in neighbouring authorities but there is a planned review of the policy's operation

			included in the Action Plan below and this can consider any issues that become apparent.
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	Some of the concerns raised above re disability could also apply to people from LGBT+ communities where this is apparent in public spaces or where this is perceived to be the case by those harassing or whose behaviour is unwanted or more to the individual or individuals concerned here.	The assessment process is intended to equip girls and women with coping and other strategies to help them deal with situations described above. The system is operating successfully in other parts of the UK and in neighbouring authorities but there is a planned review of the policy's operation included in the Action Plan below and this can consider any issues that become apparent.
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	

**Proposal Nine: The new policy aims to explain more clearly that parents are expected to accompany their children to school unless there are exceptional circumstances**

<b>Equality Themes</b> The information below is from the various consultation meetings undertaken and from the correspondence of the emails	<b>Positive Impacts</b>	<b>Negative Impacts identified</b>	<b>Solutions</b> (ways in which you could mitigate the negative impact)
<b>Age</b> (including children, young people and older people)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Disability</b> (including carers)		<ul style="list-style-type: none"> <li>There is a risk that this may disproportionately affect primary</li> </ul>	<ul style="list-style-type: none"> <li>Policy to clearly state if siblings at different schools will be considered</li> </ul>

		carers opportunities for employment <ul style="list-style-type: none"> <li>Concerns about having children at different schools and upholding this duty</li> <li>May affect parents/carers with disabilities who may not be able to do this.</li> </ul>	<ul style="list-style-type: none"> <li>Ensure clarity around expectations of parents/ carers with a disability.</li> </ul>
<b>Gender</b> (men and women)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Religion or belief</b> (including people of no religion or belief)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Pregnancy and Maternity</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Marriage and Civil Partnership</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Human Rights</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	
<b>Children of divorced parents</b>	None specifically identified via engagement, formal consultation or other routes.	None specifically identified via engagement, formal consultation or other routes.	



**Step 4 – Changes or mitigating actions proposed or adopted**

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?**

The changes to the policy are indicated in the solutions columns for each of the proposals above as they impact on protected characteristics.

**Step 5 – Monitoring**

**How are you going to monitor the existing service, function, policy or procedure?**

The Delivering Independent Travel Board comprises service leads and managers with direct experience of equalities issues arising from the day-to-day running of running these services and working group for developing the policy all have also been supported by representatives from equalities officers to provide advice on equalities issues throughout the full term of the policy’s development.

School census information relating to the characteristics of pupils in schools in the City of Wolverhampton monitor on a termly basis along with the undertaking of monitoring of pupils on home to school transport.

For adults it will be monitored through data analysis and CareFirst.

This Equality Analysis will be used as part of the review of the service after a year’s operation

## Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Ensure accessible policy documents	Development of an easier read and summary document.	Adrian Leach	April 2020
Communicate policy changes to all affected stakeholders following Cabinet on 18 March 2020	Develop comms plan to communicate final policy and implementation	Adrian Leach	March 2020
Individuals receiving specialist transport provision can feel they are not part of their local community. Consultation on the development of independent travel will allow them greater access to the local community.	Implementation of the travel policy and independent travel trainer or other action following the outcome of the consultation process being approved here.	Adrian Leach	September 2020
Consultation on the introduction of Personal Travel Budgets will allow a greater choice in travel assistance options.	Implementation of the travel policy or other action following the outcome of the consultation process being approved here.	Adrian Leach	September 2020
The proposals being consulted upon facilitate an increase in the independence and ability for independent living of individuals.	Implementation of the travel policy and independent travel trainer or other action following the outcome of the consultation process being approved here.	Adrian Leach	September 2020
The proposals being consulted upon allow greater access to	Implementation of the travel policy and independent travel trainer or other	Adrian Leach	September 2020

social, employment and educational opportunities.	action following the outcome of the consultation process being approved here.		
Review impact of the Policy including equalities related concerns raised along with any others apparent in the light of operation	<ul style="list-style-type: none"><li>• To review the impact of the policy changes</li><li>• Refresh this EA</li></ul>	Adrian Leach	December 2020

**Equality Analysis approved by:**

Head of Service: Adrian Leach	Date: 28/02/2020
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**Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team:**

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