

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

Proposal:	Analysis of response to proposals from consultation	Recommendation	Benefits/ Risks
<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>	<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>	<p><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</p>	<p><b>Benefits:</b></p> <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> <p><b>Risks:</b></p> <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>
<p><b>Proposal Two</b> The introduction of a personalised assessment process</p>	<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> </ul>	<p><b>Agree to implement proposal:</b> To introduce a personalised assessment process for travel assistance.</p>	<p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li>• <b>Results from consultation support proposal to introduce a personalised assessment process</b></li> </ul>

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	<ul style="list-style-type: none"> <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 assessment</b> and that this could create loopholes which the Council could use to deny travel assistance</li> </ul> <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</li> </ul>		<ul style="list-style-type: none"> <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> <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>

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	<p>individual's desire to be travel trained.</p> <ul style="list-style-type: none"> <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> <li>• Some parents/ carers <b>welcomed this proposal if it meant money to be</b></li> </ul>		

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	<p><b>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></p>		
<p><b>Proposal Three</b> The introduction of charges for young people of sixth form age</p>	<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>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> </ul>

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	<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 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> <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>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> <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>
<p><b>Proposal Four</b> The removal of automatic eligibility to travel assistance in an educational establishment for Social, Emotional and Mental Health (SEMH) needs</p>	<p><b>Most consultees agreed with proposal, although may consultees opted to say neither agree or disagree.</b></p> <ul style="list-style-type: none"> <li>Some viewed this proposal as an <b>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></li> </ul>	<p><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</p>	<p><b>Benefits:</b></p> <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> <p><b>Risks:</b></p>

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	<p>some were concerned that their SEMH needs would be ignored in an effort to save money.</p>		<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>
<p><b>Proposal Five</b> To provide transport only from a single address unless there are exceptional circumstances</p>	<p><b>The majority of people were in favour of this proposal.</b></p> <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> <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>	<p><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</p>	<p><b>Benefits:</b></p> <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> <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>
<p><b>Proposal Six</b></p>	<p><b>Outcome of consultation:</b></p>	<p><b>Agree to implement proposal:</b> To amend and</p>	<p><b>Benefits:</b></p>

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<p>To amend and clarify the application and appeals process for Home to School Travel Assistance</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> <li>• Many people suggested health, educational, social worker, transport, health and safety and counselling professionals, as could also being involved with the panel to provide a breadth of expertise. Some asked if a SEND officer should also be on the panel</li> </ul>	<p>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>	<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>

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	<ul style="list-style-type: none"> <li>Some questioned if Councillors were needed on the panel; others felt having a Councillor on the panel would allow their voice to be heard</li> <li>Parents were keen to understand what a 'parent representative' would be and how this would work;</li> <li>Some expressed dissatisfaction 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>		
<p><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</p>	<p><b>Outcome of Consultation:</b></p> <ul style="list-style-type: none"> <li>The majority of consultees agreed with proposal</li> <li>Concerns around what 'appropriate' meant in practice and implications of a 'nearest appropriate' location being considered inappropriate by them</li> <li>Concern that this takes away parental choice</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>	<p><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.</p>	<p><b>Benefits</b></p> <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> <p><b>Risks:</b></p> <ul style="list-style-type: none"> <li>May result in more appeals</li> <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> </ul>
<p><b>Proposal Eight</b> To reaffirm that where individuals are eligible for transport, pick-up points will be</p>	<p><b>Outcome of Consultation:</b></p> <ul style="list-style-type: none"> <li>Mixed response from consultees on proposal</li> <li>Concerns were expressed about where pick-up points are or would</li> </ul>	<p><b>Agree to implement proposal:</b> To reaffirm that where individuals are eligible for transport, pick-up points will be</p>	<p><b>Benefits:</b></p> <ul style="list-style-type: none"> <li>Greater equality of implementation</li> <li>Reduction in time pupils spend on transport</li> </ul>



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used unless there are exceptional circumstances	<p><b>be</b>, if and how they would be <b>risk-assessed</b> to address any safeguarding issues</p> <ul style="list-style-type: none"> <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>	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> 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</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> </ul>

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	<p>already been encouraged to promote independence</p> <ul style="list-style-type: none"><li>• Some people also thought this meant that they should be accompanying their children when provided with Council transport.</li></ul>		<ul style="list-style-type: none"><li>• <b>There is a risk that this may disproportionately affect primary carers opportunities for employment.</b></li></ul>