

# SEND transport in Richmond: building independence

## Summary of responses to consultation

### 1. Introduction

This report summarises responses to the recent consultation on SEND transport services in the Richmond Borough, which ran from 14 December 2018 to 27 January 2019.

### 2. Format of the consultation

The main consultation channel was an online survey hosted on the Local Offer website: ([www.afcinfo.org.uk/pages/local-offer/information-and-advice/send-consultation-hub-and-resource-bank/richmond-lbrut-specific-consultations](http://www.afcinfo.org.uk/pages/local-offer/information-and-advice/send-consultation-hub-and-resource-bank/richmond-lbrut-specific-consultations)).

This was complemented by frequently asked questions (on the Local Offer site) and three drop-in events held during the week commencing 21 January 2019. Paper copies and easy read versions were available on request.

The consultation was publicised via:

- letter or email to all parents and carers with a child or young person who uses SEND transport services in the Richmond Borough
- the news section and consultation hub on the Local Offer website
- event dates, venues and times added to various colleagues email signatures
- Achieving for Children's (AfC's) SEND transport team reminding parents and carers when talking to them over the phone
- regular tweets from AfC and Richmond Council accounts

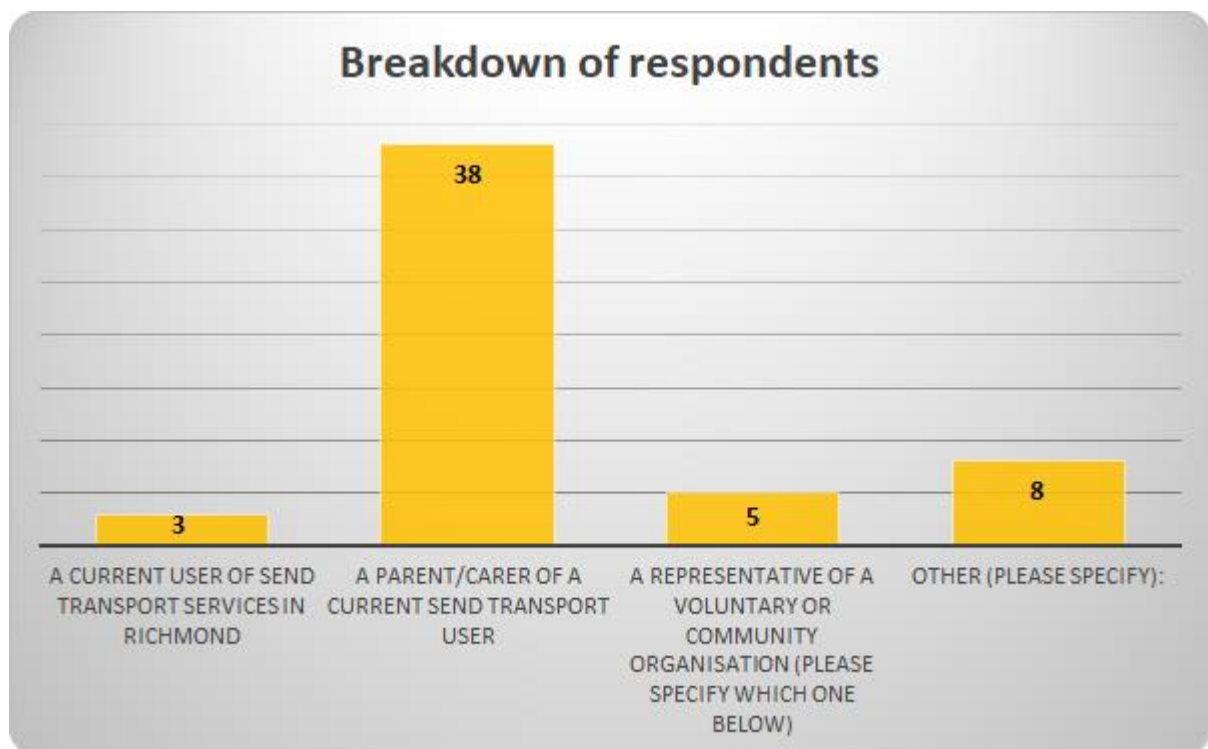
The survey invited comments on six proposals. Contextual information was provided for each proposal to help respondents to make informed responses. The six proposals were described as follows.

- Routinely offer targeted independent travel training to all eligible young people, where appropriate.
- Introduce travel bursaries.
- Increase the parental mileage allowance where their child is the only pupil eligible for SEND transport who attends a particular school.
- Introduce collection points on specific routes from September 2019, where appropriate, following a consultation with any families with pupils on those routes.

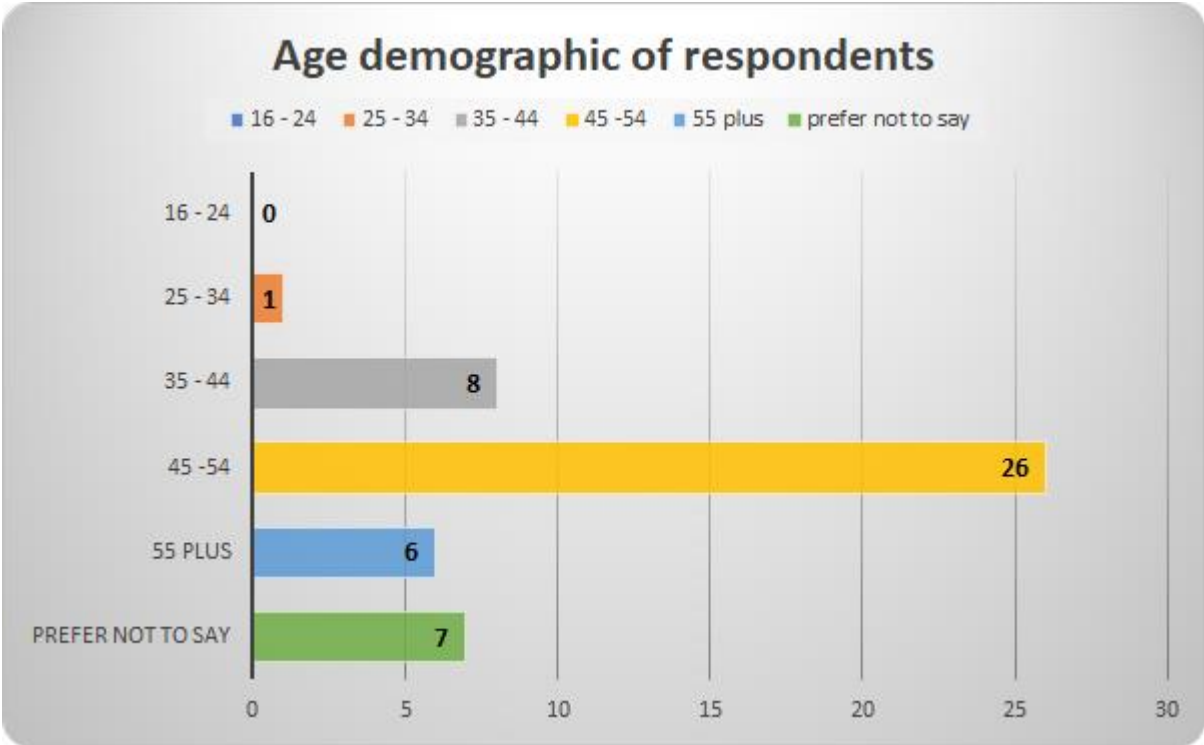
- Richmond Council would only provide home to school transport for children and young people aged between 5 and 16 years (end of Year 11). Applications for transport for pupils under 5 or over 16 years would only be agreed in exceptional circumstances. This would only apply to new applicants - existing children and young people aged under 5 or over 16 years would continue to be eligible for home to school transport.
- From September 2019, introduce a contribution charge to parents and carers of up to £1,400 a year for all post-16 SEN transport. This option would apply to all young people transferring to Year 11 from September 2019. It would not be applied to young people aged 16 and above who currently receiving SEND transport, who would continue to receive this until the end of academic year in which they become 19 years old. The contribution charge would be means-tested.

### 3. Breakdown of respondents

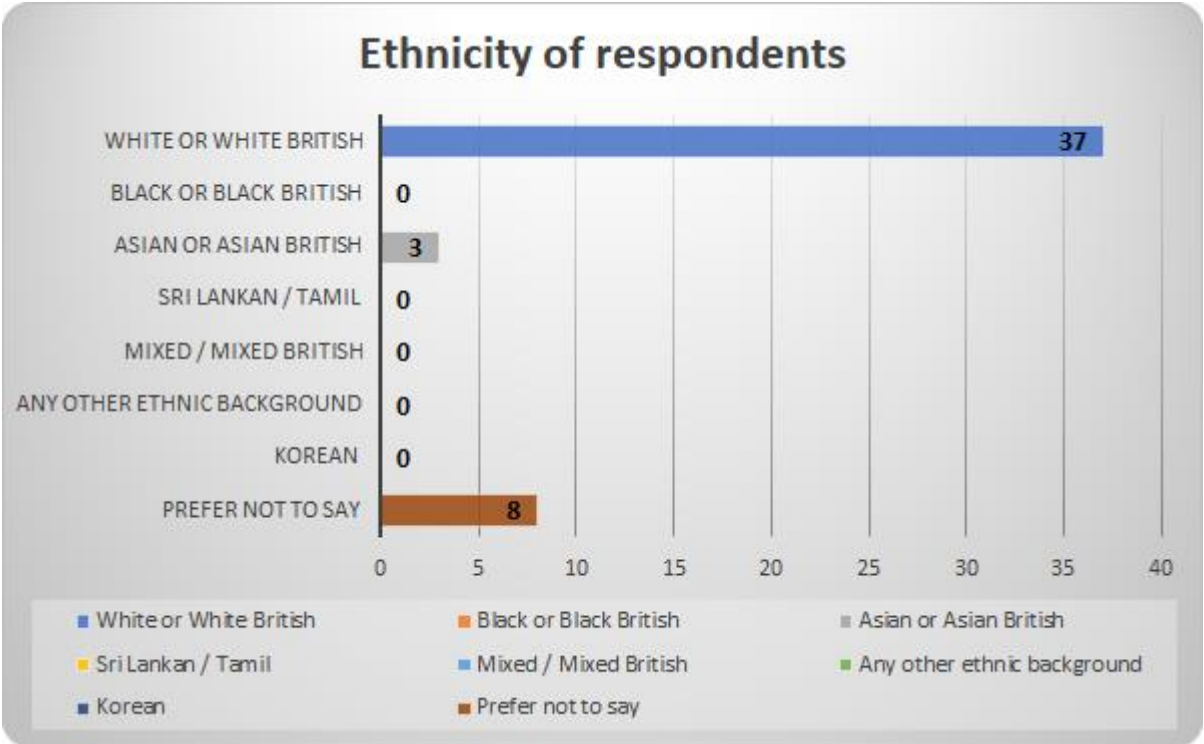
Fifty responses were received in total. Some respondents belonged to more than one category, hence the numbers in the chart below total more than 50. Thirty eight described themselves as parents or carers of a current SEND transport user. Five described themselves as a representative of a voluntary or community organisation. Three respondents were a current user of SEND transport in the Richmond Borough. A further eight respondents were in the 'other' category. This included a parent looking to apply for transport, a parent with a child who has an education, health and care plan (EHCP), a potential future user, and a parent of a SEND child not using the transport service.



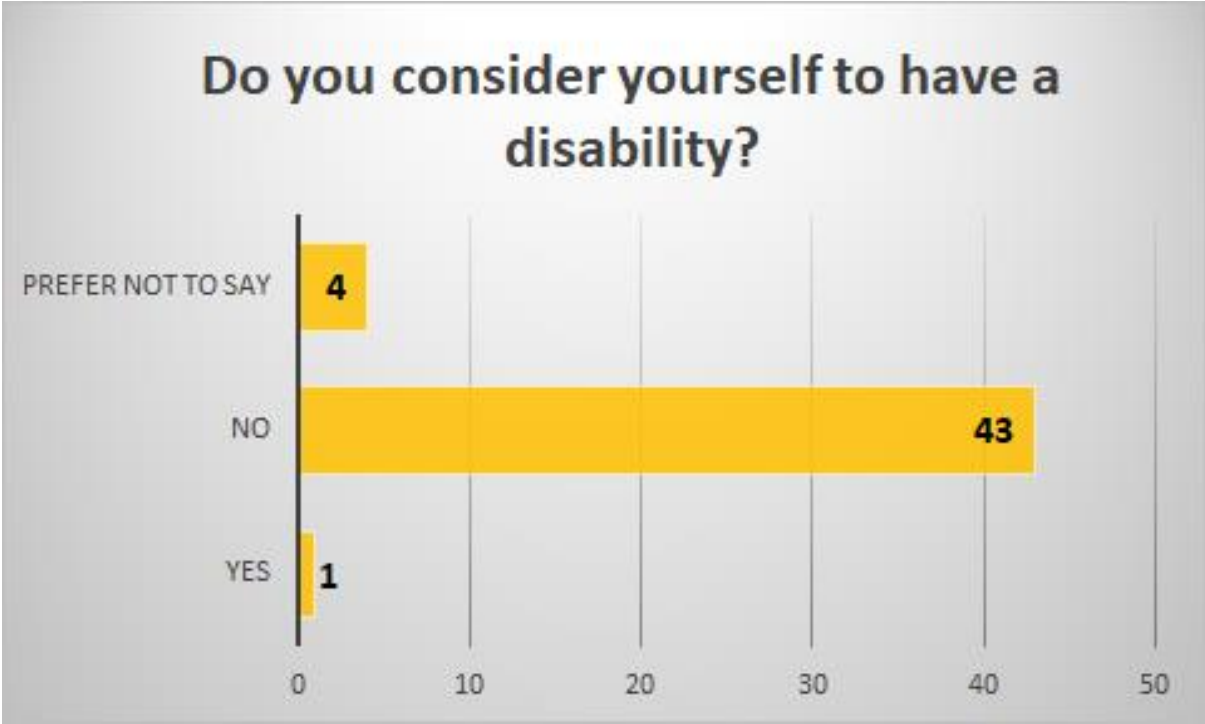
The age breakdown of respondents is set out below. At least 70% of respondents were aged between 35 and 54 years. Sixteen percent preferred not to say.



Seventy seven percent of respondents identified as White or White British. Three (equivalent to 6% of respondents) identified as Asian or Asian British, while 17% preferred not to say.

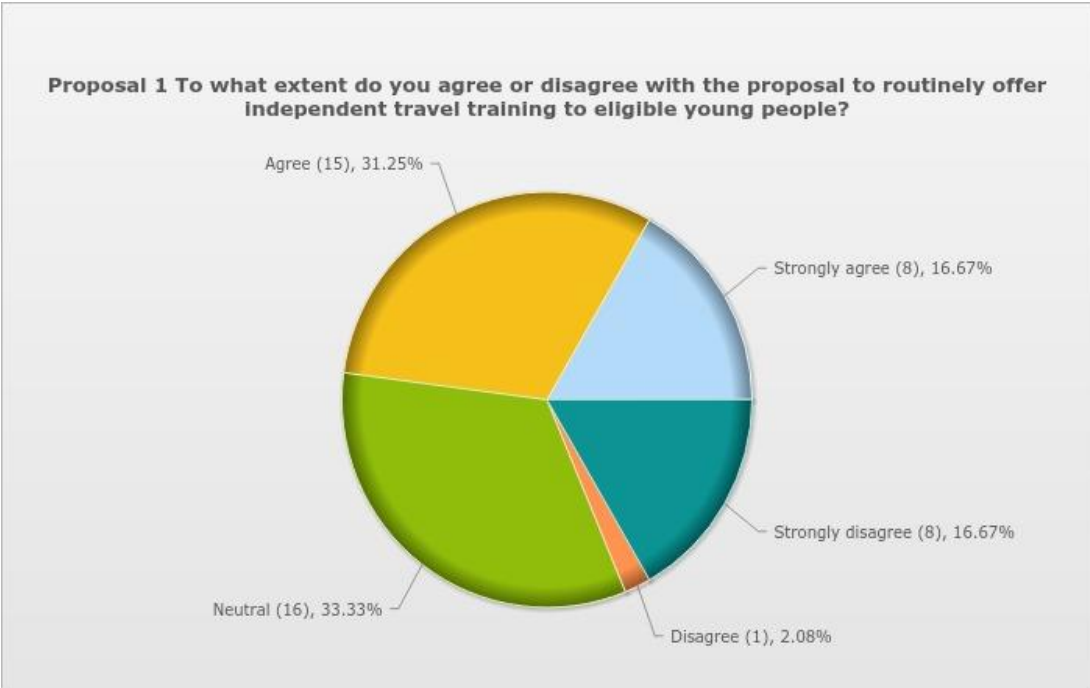


Only 2% of respondents identified as having a disability, although 8% preferred not to say.



**4. Proposal one: Routinely offer targeted independent travel training to all eligible young people, where appropriate**

After describing the proposal in more detail and providing some contextual information, the survey asked respondents to what extent they agreed or disagreed. 47.92% respondents either strongly agreed or agreed with the proposal to routinely offering independent travel training to eligible young people. 33.33% were neutral and 18.75% either strongly disagreed or disagreed to the proposal.



The survey then offered respondents the opportunity to make any further comments on the proposal, in an open text box. In total, 31 respondents provided comments. These were analysed and broken down by theme, as set out in the table below. The number of comments in the table exceeds the total number of respondents because many provided more than one comment within the open text box. Three of these themes required further analysis to provide a deeper understanding of the issues presented - this is set out below the table.

Theme	Number of comments on this theme
The proposal is not suitable for all children and needs to take the child’s situation into account (eg, medical condition, eligibility) and not mandatory	29
Training would be beneficial and should be offered	11
Not enough information to allow an informed response	5
The need for TfL staff to receive training	3
Issues with the consultation	3
Need to work closely with schools	2

**Training would be beneficial and is important in the development of children and peoples independence and confidence.**

Of the responses within this category, 11 agreed that this is beneficial, however concerns were raised around the quality of training.

**Proposal not suitable for all children**

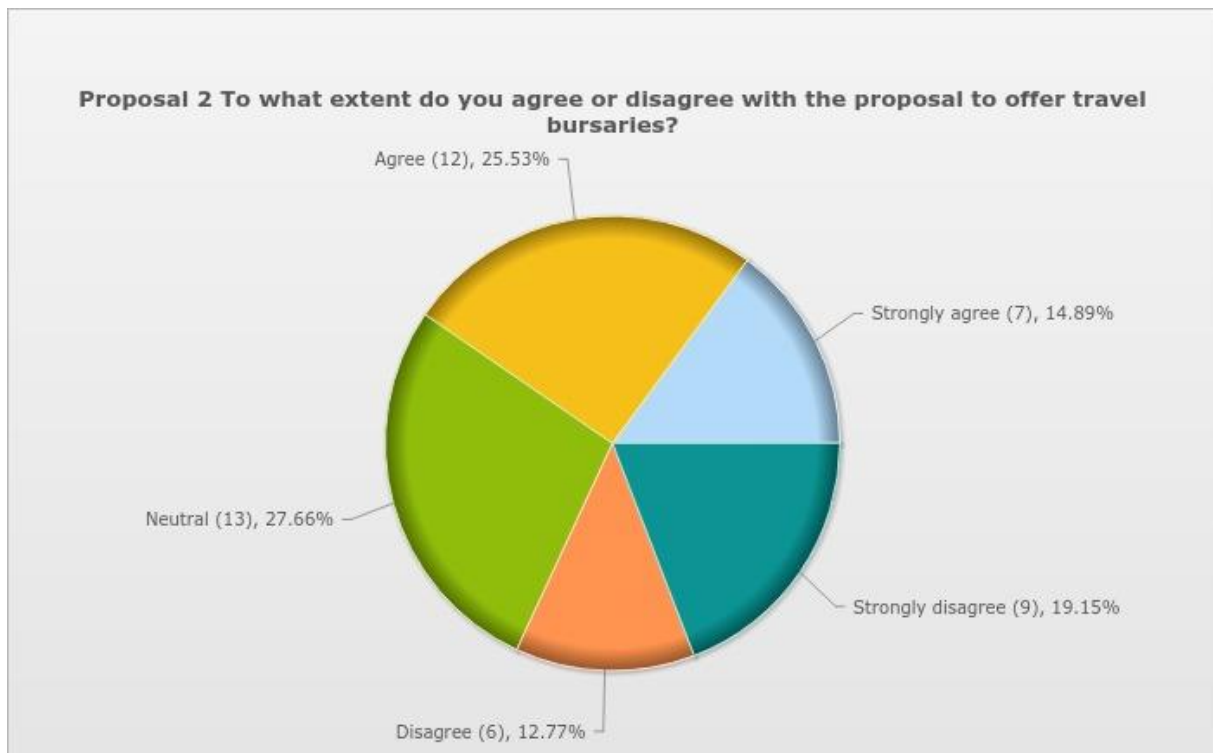
Eight respondents raised the issue that this should be optional not mandatory and a further 13 responded that it is not suitable for all children. Fourteen comments regarding eligibility and how the child’s medical, mental or physical needs will be considered.

**Not enough information to make an informed response**

Five respondents stressed they did not have enough information regarding the criteria that would be used to assess a child or young person’s suitability for the training. Some also asked for further information on the costs of providing training and the anticipated savings.

**5. Proposal two: Introduce travel bursaries**

After describing the proposal in more detail and providing some contextual information, the survey asked respondents to what extent they agreed/disagreed. 40.42% of respondents either agreed or strongly agreed with the proposal, compared to 31.92% of respondents who either disagreed or strongly disagreed.



The survey then offered respondents the opportunity to suggest ways in which bursaries could be used to give families more flexibility, independence and choice in how their transport is provided, via an open text box. In total, 16 respondents entered suggestions. These were analysed and broken down by theme, as set out in the table below. The number of suggestions in the table is less than the total number of respondents as some respondents did not provide other suggestions within the open text box.

Theme	Number of comments on this theme
Through partnering find solutions together to reduce cost of travel	1
Monthly payments in advance	1
Car fuel payment or free travel card for parent	1

The survey then offered respondents the opportunity to make any further comments on the proposal, in an open text box. In total, 26 respondents provided comments. These were analysed and broken down by theme, as set out in the table below. The number of comments in the table exceeds the total number of respondents because many provided more than one comment within the open text box. Two of these themes required further analysis to provide a deeper understanding of the issues presented - this is set out below the table.

Theme	Number of comments on this theme
Mentioned problems with the proposal: impact on families, additional stress on families	7
Mentioned that it could be an attractive option	6
Not enough information with some reference to: cost implications vs savings, mandatory or optional, payment methods and safety	6
Not suitable for everyone	5
Mentioned issues with the bursary: monetary amount, payment terms, control	4

### **Impact on families, additional stress and criteria**

Seven respondents felt that it would add further complexity to already complex and pressured lives, and were concerned about the potential impact on family and work life.

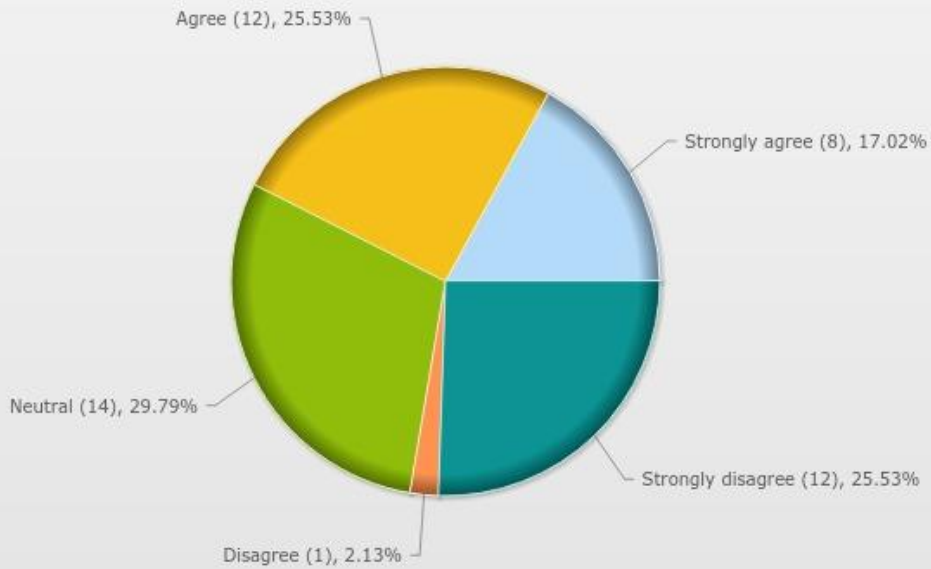
### **Agree with some aspects of the proposal**

Six respondents agreed this could be an attractive option as a bursary could allow families to choose an alternative more personalised mode of transport if there is one available to them, such as paying a family member or friend to provide transport. It may also make transport more comfortable for those young people who do not want to use a minibus or taxi service; not every child's experience of these is positive and neither does it suit every child. However, five responded that this would not be suitable for all and were not sure of what criteria would be applied. Six also stated concerns around safety, attendance and additional pressure put upon parents.

## **6. Proposal three: Increase the parental mileage allowance where their child is the only pupil eligible for SEN transport that attends a particular school**

After describing the proposal in more detail and providing some contextual information, the survey asked respondents to what extent they agreed or disagreed. The proportion of respondents who either agreed or strongly agreed with the proposal was 42.55%, compared to 27.66% of respondents who disagreed or strongly disagreed.

**Proposal 3 To what extent do you agree or disagree with the proposal to increase the parental mileage allowance where a child is the only pupil eligible for SEN Transport who attends a particular school?**



The survey then offered respondents the opportunity to make any further comments on the proposal, in an open text box. In total, 27 respondents provided comments. These were analysed and broken down by theme, as set out in the table below. The number of comments in the table exceeds the total number of respondents because many provided more than one comment within the open text box. Two of these themes required further analysis to provide additional detail - this is set out below the table.

Theme	Number of comments on this theme
Expressed concern about the proposals (including unrealistic, won't make a difference, discriminatory, etc)	9
Current mileage allowance is too low	6
Parents unable to drive or provide transport (including working parents)	6
It should be optional	4
Too little information	4
The proposals should help	3
Additional financial support is required	1



### Concerns about the proposal

Nine respondents expressed concerns that the proposal was unrealistic and would not make a difference to all families. One parent suggested that the proposal was discriminatory as it was not being offered to all families.

### Mileage allowance too low

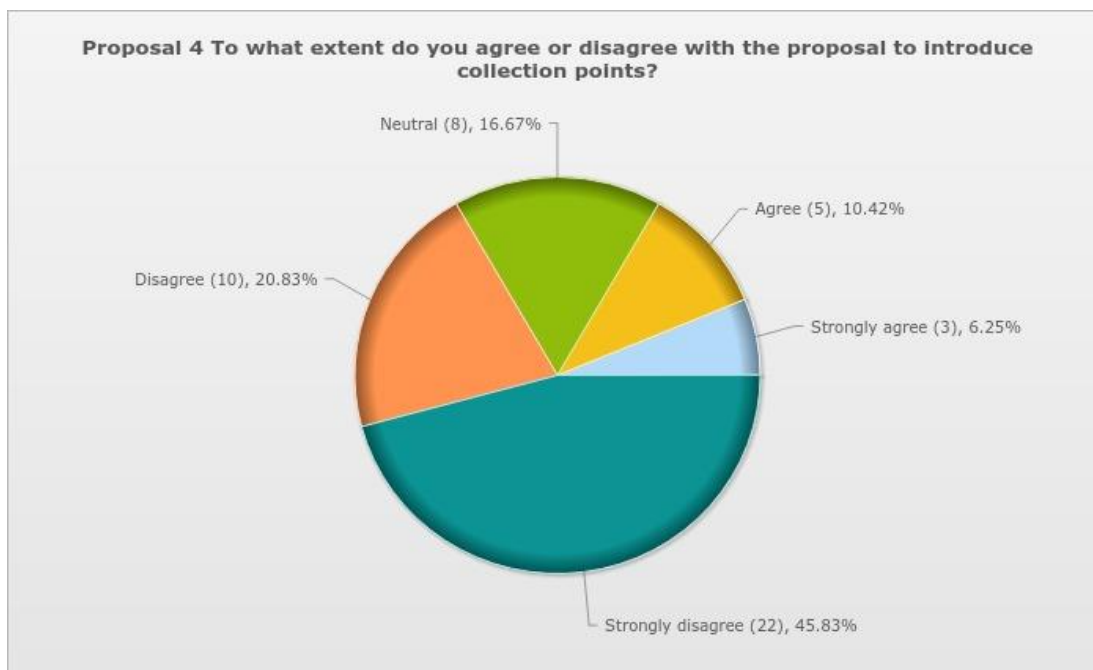
Six stated that the overall mileage allowance is not enough at its current rate and it would not be fair to increase for only a small number of parents.

The survey then offered respondents the opportunity to suggest other ways in which the Council could enable more independent travel, and/or support families financially to provide their own transport to school or college. In total, 14 respondents entered suggestions. These were analysed and broken down by theme, as set out in the table below. The number of suggestions in the table is less than the total number of respondents as some respondents did not provide other suggestions within the open text box.

Theme	Number of comments on this theme
Provide additional support	2
Comments related to adequate funding and costs	2
Promote more independent travel training	2
Improve in borough provision	2
Offer a robust buddy system	2
Provide further financial support	1

## 7. Proposal four: Introduce collection points on specific routes from September 2019, where appropriate, following a consultation with any families with pupils on those routes

After describing the proposal in more detail and providing some contextual information, the survey asked respondents to what extent they agreed or disagreed. As the chart below shows, there was strong opposition to this proposal, with two thirds of respondents either disagreeing or strongly disagreeing with the proposal, compared to just 16.67% who agreed or strongly agreed.



The survey then offered respondents the opportunity to make any further comments on the proposal, in an open text box. In total, 33 respondents provided comments. These were analysed and broken down by theme, as set out in the table below. The number of comments in the table exceeds the total number of respondents because many provided more than one comment within the open text box. Three of these themes required further analysis to provide additional detail - this is set out below the table.

Theme	Number of comments on this theme
Collection points would be impractical for parents and unrealistic for some children and young people	25
Issues if buses are late (weather, traffic congestion, etc)	11
Agree with some aspects of the proposal	8
Potential negative impact on children's health of travelling or waiting in poor weather	8
More information required	7
Disagree (no specific reason given)	3
It will force more parents to drive, creating extra traffic congestion	1

**Collection points would be impractical for parents and unrealistic for some children and young people**

Of the responses within this category, nine expressed concern that getting to the collection points would disrupt routine and create added anxiety and stress for children and young people. Seven respondents raised the potential impact on families with children attending different schools, and a further three felt that collection points would have a detrimental impact on the mental health of siblings. Six respondents felt that it would add further complexity to already complex lives, and/or deny parents the right to an ordinary life.

**Agree with some aspects of the proposal**

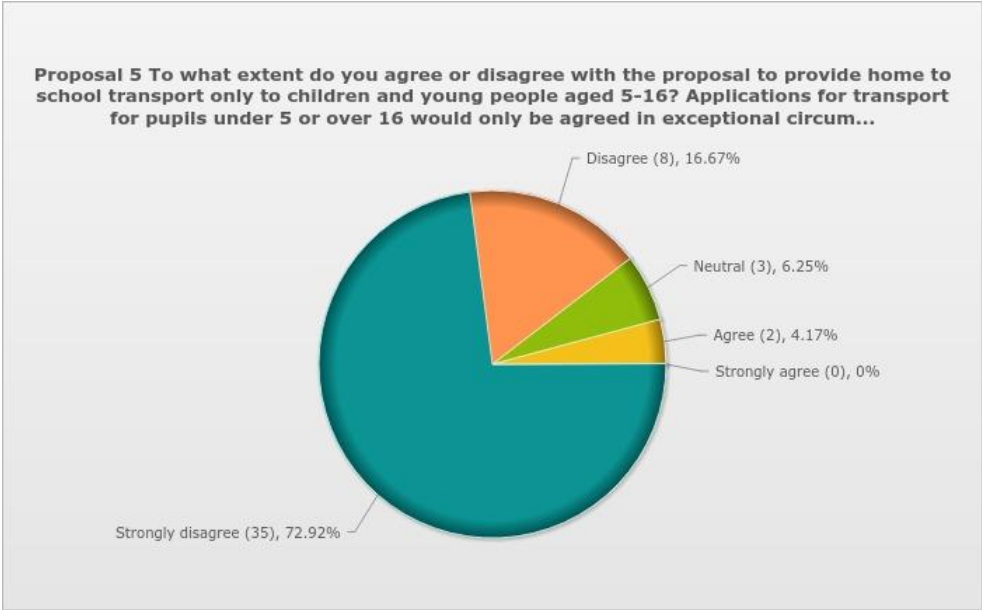
Respondents who expressed some support for the proposal did so with the caveat that collection points were within a reasonable distance from people’s homes (four), and were not imposed on children or young people whose needs are too complex (three).

**More information required**

Of the seven respondents who felt they needed more information to give an informed view, four wanted to know what the distance between home and the collection point would be. Four respondents wanted to know what the cost savings would be. One other wanted to know what the age range and level of need would be.

**8. Proposal five: Richmond Council would only provide home to school transport for children and young people aged between 5 and 16 years (end of Year 11), other than in exceptional circumstances.**

After describing the proposal in more detail and providing some contextual information, the survey asked respondents to what extent they agreed or disagreed. 89.59% of respondents either disagreed or strongly disagreed with the proposal, compared to only two respondents who agreed with the proposal (no respondents strongly agreed).



The survey then offered respondents the opportunity to make any further comments on the proposal, in an open text box. In total, 39 respondents provided comments. These were analysed and broken down by theme, as set out in the table below. The number of comments in the table exceeds the total number of respondents because many provided more than one comment within the open text box. Four of these themes required further analysis to provide additional detail - this is set out below the table.

Theme	Number of comments on this theme
Unfair, unethical, discriminatory against young people aged 16 to 19 years	21
Limits parents’ or young people’s options	9
More information required	7
Legal issues	4
Encourage more independent travel instead	3
Agree if it’s decided on a case by case basis	2
Eligibility criteria should be tightened so only young people receive SEN transport who need it	2
Disagree (no specific reason given)	1
Not enough local provision, forcing children to travel further to school or college	1

**Unfair, unethical, discriminatory against young people aged 16 to 19 years**

Forty two percent of the responses received were within this category. Six respondents commented that adults and under-16s are able to travel for free, so to remove this for a narrow age range would be unfair. Four comments within this category made the point that young people are now required to stay in formal education or training post-16, so to adversely impact on their ability to get to school or college would be unfair.

**Limits parents’ or young people’s options**

The majority of respondents in this category pointed out that this proposal would limit young people’s choice of further education. An additional four respondents commented that the proposal would impact on parents’ family and work life.

**More information required**

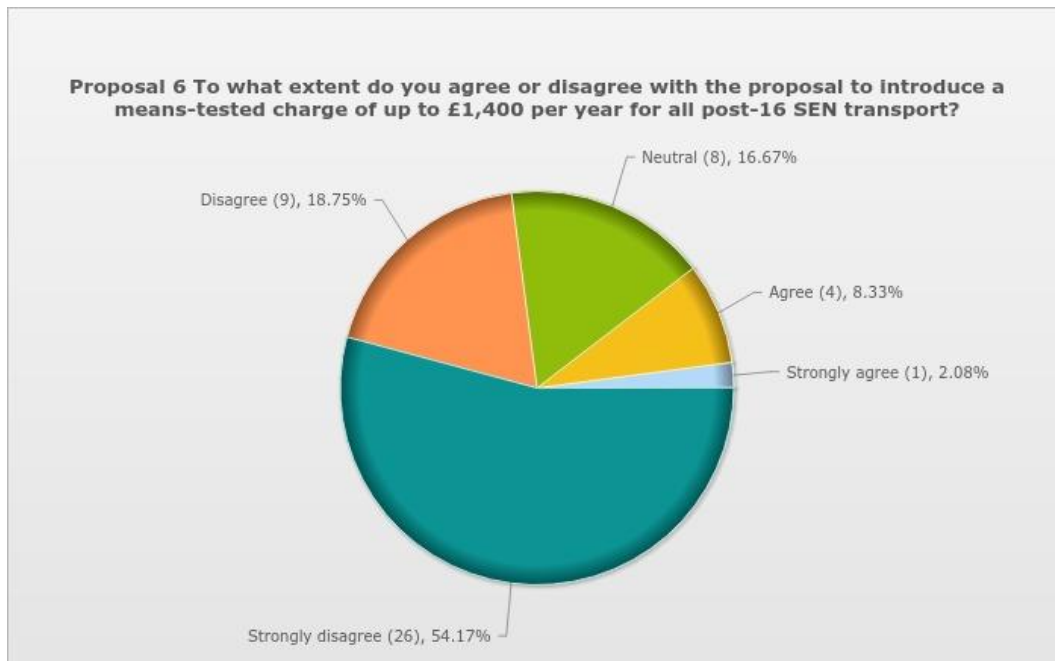
Five of the seven respondents commented that the proposal needed to define what constitutes ‘exceptional circumstances’ before they felt able to give an informed response. Two respondents wanted to know what the financial savings would be for this proposal.

## Legal issues

Four respondents argued that this proposal would not be lawful. Specifically, two responses claimed that if the withdrawal of transport support meant that young people were unable to get to the place of education named in their EHCP, it would not be lawful. One respondent pointed out that it is a legal duty of local authorities to publish a transport policy for young people aged 16 to 19 years, and to effectively withdraw this support through a blanket policy would be unlawful.

### 9. Proposal six: Introduce from September 2019 a contribution charge to parents and carers of up to £1,400 a year for all post-16 SEN transport.

After describing the proposal in more detail and providing some contextual information, the survey asked respondents to what extent they agreed or disagreed. 72.92% of respondents either disagreed or strongly disagreed with the proposal, compared with 10.41% of respondents who agreed or strongly agreed.



The survey then offered respondents the opportunity to make any further comments on the proposal, in an open text box. In total, 36 respondents provided comments. These were analysed and broken down by theme, as set out in the table below. The number of comments in the table exceeds the total number of respondents because many provided more than one comment within the open text box. Two of these themes required further analysis to provide additional detail - this is set out below the table.

Theme	Number of comments on this theme
Unfair financial burden on families	12
Unfair, unethical discriminatory against young people aged 16 to 19 years	12
More information required	8
Agree if parents are able to pay	4
Disagree (no specific reason given)	3
Legal issues	2
Not enough local provision, forcing families to need SEN transport	1
Eligibility criteria should be tightened so only young people receive SEN transport who need it	1

### **Unfair financial burden on families**

Of the 12 comments within this category, five compared the proposal to a tax on families with children with SEND. A further four respondents commented that families with disabled children already had a higher cost of living, and were more likely to have a low income.

### **More information required**

Eight respondents felt that they needed more information before they could make an informed response. Four of these asked for more information on how the means-testing would work in practice. Two respondents asked how much the new policy would cost to implement or maintain, and a further two asked how much the proposal would save.