



SNAP PARENT CARER FORUM

CENTRAL BEDFORDSHIRE

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

Introduction

SNAP PCF have compiled this review in response to the consultation regarding proposals to change the 'The Home to School/College Travel Assistance Policies for Central Bedfordshire'. SNAP are concerned that the proposed changes will have a detrimental impact on the lives of children and young people with SEND in Central Bedfordshire and their families. We also believe it will limit some individuals' ability to access education.

SNAP (Special Needs Action Panel) is a pro-active, independent forum of parent carers who all have children or young people with Special Educational Needs and Disabilities (SEND). As members of the National Network of Parent Carer Forums we support the development of parent carer participation, a process in which parents work together with professionals to make improvements to local services. We act as a conduit for a wide variety of local professionals in their work with children and young people with SEND.

Parent carer forums are recognised and funded (by the Department for Education through Contact a Family) to provide parent carer views and opinions at a strategic level, therefore providing valuable insight into how services need to operate to provide best outcomes for families. It is known that through a process of co-production better, more efficient and more affective services can be provided to families. SNAP PCF firmly believe in this ethos (as outlined in the SEND Code of Practice: 0 to 25 years) and has worked hard to form working relationships with the local authority and NHS providers in Central Bedfordshire.

This review will look at the model of coproduction that has been established locally and highlight concerns regarding the proposed changes to the Home to School/College Travel

Assistance Policies. This review also contains a case study that was sent to us from a concerned parent.

Co-production

Co-production with SNAP PCF

SNAP PCF were disappointed to learn of this consultation through public channels. We would have valued the opportunity to have been involved from the start of the consultation as this would have given us opportunity to raise our concerns sooner. We strongly believe that involving SNAP from the very beginning greatly reduces the possibility of conflict in the future and makes consultations more meaningful and effective.

SNAP PCF have worked with Central Bedfordshire Council to produce the SEND Vision. Extracts from this document which highlight the importance of parent carer involvement in shaping local services are included below in fig1.

Fig 1) Shared Vision (Education, Health and Social Care) for Children and Young People (0 – 25) from Central Bedfordshire with Special Educational Needs and Disabilities (SEND)

All agencies will work with families to ensure that services are shaped and delivered to support children and young people with SEND in achieving the very best they can. Co-production of services with children, young people and their parents and carers will be at the heart of everything we do.

Co-production and the SEND Vision

Definition ‘Co-production happens when service providers and service users recognise the benefits of working in true partnership with each other. This process is adopted ‘from the start’, when planning, developing, implementing or reviewing a service. It means that all the right people are around the table right from the beginning of an idea, and that they are involved equally to: Shape, design, develop, implement, and review services. Make recommendations, plans, actions, and develop materials. Work together right from the start of the process, through to the end.

Consultation is not the same as co-production. A stage of consultation can be part of an overall co-production process. It usually occurs after the early stages of coproduction have been completed.’ The views of parents and carers are presented through Central Bedfordshire’s Parent Carer Forum - SNAP (the Special Needs Action Panel). This is the parent carer forum comprising a representative group of parent service users. SNAP bring a valuable independent perspective and constructive challenge to the future planning of services. We recognise the high value of the information derived from the informal networks SNAP has developed with other parents.

Principles

Co-production, working with parents/carers and young people to be a responsive service. Co-production will be the unifying principle for the design, implementation and monitoring of services. This embraces all those delivering and receiving both universal and specialist provision. The skills, knowledge and experience of children and young people with SEND and their families will be fully drawn upon to shape services and ensure that the right services are developed and delivered consistently across Central Bedfordshire and in the most effective way. Agencies will work together in a consistent and integrated way with families to support the child and family, and joined up services will be developed in the local area to ensure that children and young people's needs are met locally. Services of all types will grow and develop to reflect children and young people's growth and development, and their changed needs over time.

Co-production with other organisations

SNAP notes that there was recently a Carers Partnership Meeting hosted by Carers in Bedfordshire regarding transport. SNAP would like to know if and how feedback from this meeting fed into this consultation? We would also like to know if you have involved any other organisations in the consultation? What work you have done to promote this consultation i.e. how far and wide has it been promoted, and what organisations have been involved in this?

Time-line

SNAP has concerns over the timeline of the consultation. You state that 'Parents and carers will be able to understand the new policy provision before submitting their secondary upper school admissions applications by 31 October 2017, or lower / primary / middle transfer applications by 15 January 2018.' SNAP would like clarification of when it is felt the new policy will be ready to be brought back to the Executive for adoption? When and how will the new policy be made available to parents in order that they can make informed choices when applying for school places in October 2017?

Concerns regarding the proposed changes

The Executive Paper

In the Executive Paper, listed as one of the consultation documents, item 28 states 'The Council has a statutory duty to promote equality of opportunity, and to foster good relations in respect of nine protected characteristics one of these being disability'. SNAP would like a copy of your current equalities impact statement. We understand that a refresh will happen as part of this review, will CBC be using the Equality Forum to do this and what is the time scale of this?

As one of the reasons for the decision to review, item 11 states 'To ensure that the council adopts a fair, equitable and transparent policy to support all pupils and their families'. In the Council priorities, item 15 states 'Protecting the vulnerable; improving wellbeing, by ensuring that some of our most vulnerable residents are able to access education.' It is important that the transport department work with the Children with Disabilities Team to understand the impact of the proposed changes. In addition are NEET figures in CBC, which need to be reduced, being considered as part of this consultation?

Motability

The proposed changes document state:

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

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

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

(a) arrangements for the provision of transport, and

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

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

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

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

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

The mobility cars are subject to a three-year lease and have a 60,000-mileage limit in those three years, anything over this figure is then charged at five pence a mile. If a parent decides to cancel their mobility car and take the extra payment they will be subject to a £250.00

administration fee. Parents who have a disabled child are already more likely to live in poverty; this policy helps to increase this situation.

SNAP would like to clarify, if a parent carer has a mobility car, is the council suggesting that they will no longer be entitled to their free school transport? If this is the case then parents who work may no longer be able to continue in employment. There will also be more congestion on the road as, instead of one mini-bus collecting six children, there will now be an extra five cars on the road. Mobility cars do not have a hoist, therefore a parent carer will not only have to travel to their special school, which for the majority will not be local to them, they may have extra lifting to do twice a day, five days a week. In addition, the parent may now have a two-hour round trip to get to and from school, twice a day equaling four hours. This may be when the parent carer sleeps if they have been up through the night caring. The roads around the schools will be more congested. There is a potentially dangerous impact of this, furthermore, what happens when the parent is sick and unable to drive the child to school? Some of our children have profound needs and while a mainstream parent may be able to ask a neighbour or friend to help, our families rarely have access to this support.

Under fives

How many children under five do you transport currently? The Council for Disabled Children has written a report on how disabled children fall further behind even at the start of their early years education aged two years of age – they rarely ever catch up. This transport consultation helps to accelerate this. This is potentially discriminatory. Children without SEND are likely to be in nursery or reception class close to home. Children with severe / complex needs may attend special schools at some distance from their home. LAs must offer full time reception places from the September after a child's fourth birthday, so disabled children will be disadvantaged if they cannot access education until they turn five due to a lack of transport.

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

Finance

On the website, page two of the consultation states a rise of £1.1 million spent on transport from the previous year. In the Executive Paper, there is a variance of £115,183 for 15/16 and £872,339 in 16/17 for SEN and for SEN College the variance is £58,867 for 15/16 and £23,690 for 16/17. Can efficiencies be found here first? Is there a more cost-effective way to manage this?

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

criteria? Please clarify what the cost is for travel as at the moment it states, 'a fee that reflects the cost to the council'. This is ambiguous. Parents need accurate information to fully understand the impact to them before completing a consultation. Offering a travel pass in the first instance is reasonable but for children with SEND it must take account of the needs of the child, not be a blanket policy. Some young people with SEND will not be able to travel by public transport until well into their teenage years and others may never achieve that level of independence.

Pyramid of schools?

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

Travel Training

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

Boarding school

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

Eligibility

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

- Distance
- Low income families
- Unsafe walking route

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

Distance criteria and qualifying schools

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

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

EHCPs

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

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

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

Public transport for mainstream schools

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

Contribution for 16+

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

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

Conclusion

SNAP PCF understands the need for the local authority to review and reduce their spending. We co-produce to ensure money is being spent in the most efficient way possible. By working with the forum, we can support you in the process and help to ensure you get the maximum input in your consultation. We hope to build a positive working relationship to ensure families get the best information and services they need.

SNAP are pleased to note that our concerns regarding the links to information on the webpages have been listened to and that the information is now easier to access. It is also positive that the forum has been invited to work with the local authority on the consultation and we thank you for agreeing to meet with parent carers on the 22nd of September 2017. SNAP PCF also welcome the opportunity to present our concerns on the impact on the SEND community to the Overview and Scrutiny Board.

SNAP is concerned that some families are expressing the view that as they already receive school transport their provision will not change in the future. Some families believe that the changes will only affect those accessing transport provision for the first time after September 2018. SNAP urges CBC to reinforce the message that the proposed changes will affect all families.

Please see appendix 1 which contains a personal story about how the proposed changes will impact a family living locally.

Appendix 1: A case study from a concerned parent carer who contacted SNAP PCF

Objections to the proposed changes to the home to school/college transport policy

Specifically:

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

The proposed change discriminates against families that need wheelchair accessible vehicles.

Those families, who access the Motability Scheme due to needing a wheelchair accessible vehicle, do so out of necessity not choice. We already find ourselves paying much higher advanced payments for vehicles than those accessing typical family cars through the scheme and so are at a disadvantage to other users of the scheme. I personally have to have a wheelchair accessible vehicle through the Motability Scheme as my son cannot access a typical family car due to his physical disabilities and behavioural issues. I found the transition to a wheelchair accessible vehicle very hard as it removed another element of normality from our lives and restricted the choices I was able to make – in reality when we explored options there was only one vehicle in the scheme which met our needs. By bringing in your proposed changes my son's wheelchair accessible vehicle will be the reason that mine and my sons world will be even more restricted – I again reiterate I have a wheelchair accessible vehicle out of necessity not choice.

It is not fair that people needing adapted vehicles should be excluded from participating in the home to school/college transport programme. I believe you are in fact discriminating against those with the highest level of need as those with less severe mobility issues will be able to access the home to school/college transport programme.

The proposed changes remove my son's independence.

If my son were a typical 13yr old without physical and learning difficulties he would get himself to and from school independently. My son has been able to travel to school independently for 10 years thanks to the home to school/college transport programme. It is out of my control that the closest suitable school for my son is 10 miles away from our home. Any other child whose closest school was 10 miles away from their home would be transported to school by the local authority. I fail to see how our family's involvement with the Motability Scheme affects the local authority's duty to provide transport to the closest school that can meet my son's needs.

Children with high mobility needs and those that are wheelchair users have precious little independence, they rely on others for most aspects of their daily life. By implementing the proposed changes, you will make them dependant on family members to get to school and remove a level of independence that they have enjoyed, possibly for many years. This could have an adverse effect on their mental health and wellbeing.

The proposed changes will put undue pressure on vulnerable families.

I have two other children, one of which has special needs and I believe under the proposed changes would still be eligible for transport. I need to be at home for drop off and pick up times. I have another child who attends mainstream primary school, who needs to be at school by 8.45am and collected at 3.30pm – these are the times I would be expected under the proposed changes to be dropping and collecting my third child at a school which is 10 miles away from my home. What support is the local authority going to provide to enable me to be in two places at once? In addition, will special schools now be providing breakfast and afterschool clubs for those families with working parents? If this is not provided alongside the proposed changes I suggest many families will find that parents that are currently working will no longer be able to do so – I will find myself in this situation. Not only will this involve financial hardship but will also have a huge impact on parent carers mental health and wellbeing which will in turn put pressure on local health and social carer services.

By implementing the proposed changes, you put pressure on already stretched families; financial pressure if parents lose jobs due to now transporting children previously eligible for home school transport, and emotional pressure of trying to juggle multiple school drop-offs in various locations.

The proposed changes will increase the number of vehicles accessing school sites.

The school environment is already a busy one at the start and end of the school day. By enforcing the proposed changes, you will increase the number of vehicles having to access the school site. Transport contractors have mini buses to fulfil the contract this means that wheelchair users and other children that will be affected currently travel on minibuses with other children. The proposed changes will see these children traveling alone in vehicles and therefore increase the amount of congestion at the start and end of the school day.