

APPENDIX 4: Full Equality Impact Assessment (EIA) for proposed new Travel Assistance Policies

Decisions in scope of this Equality Impact Assessment

Two decisions are in scope of this Equality Impact Assessment:

1. **The decision to approve** a new Travel Assistance Policy for children resident in Wokingham aged 5-16, including children and young people with Special Educational Needs and Disabilities
2. **The decision to approve** a new Travel Assistance Policy for young people aged post-16 including young people with Special Educational Needs and Disabilities

Please note that the proposed implementation date for both policies is the Academic Year commencing **September 2022**.

Background and Context

All local authorities are required to periodically review their policies in relation to Travel Assistance for children and young people to access education, including children and young people with Special Educational Needs or Disabilities (SEND).

Further to consultation with a cross-party representative group of elected Members, two new Travel Assistance Policies were developed in the Summer of 2020. The purpose of this work was to update the Council's current Home to School Transport Policy, with a view to implementing a clear set of viable policy commitments in relation to Travel Assistance which are lawful, sustainable and viable, and appropriate given the needs of children and young people in Wokingham. The proposed new Policies were intended to help enable the Council to:

- Continue to fulfil its statutory responsibilities and requirements in relation to Travel Assistance
- Deliver on its commitments to improve outcomes for children, young people and their families
- Consider options in relation to discretionary Travel Assistance

The Policies were submitted for consultation, which included:

- Consultation with Parent Carers through focus groups facilitated by the Parent Carer Forum (SEND Voices Wokingham)
- Full public consultation which commenced on 18th September 2020 and concluded on 6th November 2020 – which involved targeted communications through service-user contact information; promotion through professional networks; promotion through the Council's social media platforms; and promotion through the Parent Carer Forum and Children with Additional

Needs Network to ensure that service users were aware of and able to respond to the consultation

Outcomes from the public consultation exercise, and a summary of the key messages from responses, were submitted to the Executive for discussion in March 2021.

The Travel Assistance Policies have been updated in the light of feedback from the public consultation, in order to help ensure the new Policies meet statutory and legal responsibilities, whilst helping to ensure the long-term sustainability and financial viability of the service offer.

The Travel Assistance Policies are one of several strands of the Community Transport Programme, and are strategically aligned with the Borough's SEND Strategy 0-25 and SEND Innovation and Improvement Programme. Collectively this work aims to ensure that Travel Assistance is provided in an efficient and effective way for those who are eligible to receive it; that the service is safe and high-quality; and viable in the long-term.

Why does this Equality Impact Assessment need to be completed?

The proposed new Travel Assistance Policies are likely to have an impact on groups with protected characteristics under the Equality Act 2010, in particular:

- Age
- Disability

Additionally, several stakeholders are likely to be affected by implementation of new Travel Assistance Policies in scope for this EIA. These include:

- Children and young people (of statutory school age, and aged 16+ in the case of young people with SEND)
- Parents and Carers
- Schools and colleges
- Transport providers

This EIA is necessary to understand any potential differential impacts prior to any formal decisions to approve the new Policies. In the case where any potential negative differential impacts may possibly arise from implementation of the new Policies, these need to be identified along with suggested mitigations.

How does the proposed decision support delivery of the Council's Community Vision

The proposed new Travel Assistance Policies make a direct contribution towards the Community Vision to ensure Wokingham is 'A great place to live, learn, work and grow and a great place to do business', and towards strategic priorities which deliver that Vision.

The benefits to the community from effective Travel Assistance policies include:

1. To help enable all children and young people to fulfil their potential by facilitating and enabling access to learning and education, thereby making a an important contribution towards priorities in the Community Vision around **Enriching Lives**
2. To enable the Council to fulfil its legal and statutory duties to provide Travel Assistance to eligible children and young people in the borough

In addition, new policies for Travel Assistance aim to:

3. Put in place policies and criteria which are clearer and easier for parents, carers and professionals to follow, which contributes towards the strategic priority **Changing the Way We Work for You**
4. Contribute to the substantial portfolio of work which aims to improve the long-term sustainability, quality and financial viability of Travel Assistance, and set out an offer of Travel Assistance which is in line with best practice in local government - which helps enable the Council to **Be the Best** it can be for its residents

Which areas of the Borough are potentially affected by this decision?

All areas

The following section sets out more detailed analysis of issues relating to the potential Equality Impact of the proposed new Travel Assistance Policies, and details of how the proposed new Policies attempt to address key Equality Issues, and mitigate against any potential negative differential impacts.

ANALYSIS OF ISSUES WITH POTENTIAL EQUALITY IMPACT

Legal Duties in Relation to HST/Travel Assistance

Local authorities are subject to several legal and legislative requirements in relation to provision of Travel Assistance for children and young people to access places of education and learning including those set out in the following legislation and statutory instruments:

- The Education Act 1996
- The Education and Inspections Act 2006
- **The Equality Act 2010**
- The School Admissions Code
- The School Travel Regulations 2007
- The Care Act 2014
- Education Funding Regulations
- The Children and Families Act 2014
- The School Standards and Framework Act 1998
- Statutory guidance from the Department for Education

By way of summary, the legal and statutory requirements around Travel Assistance relate to:

- Legal responsibilities and duties on local authorities to provide Travel Assistance
- Specifics relating to eligibility criteria as described in law, relating to factors such as walking distances from home to places of education and how these are to be calculated; criteria relating to assessment of the safety of walking routes; responsibilities around safeguarding children and young people in receipt of Travel Assistance (which extend to responsibilities of the local authority in terms of relationships with providers); **and specific duties and eligibility criteria relating to Travel Assistance for children and young people with SEND**
- Terms and conditions under which discretionary Travel Assistance can be provided, and circumstances under which local authorities are able to apply charges for Travel Assistance (e.g. for young people post 16).

This means that local authorities' provision of Travel Assistance is subject to several complex legal, legislative and statutory drivers and constraints. The work undertaken to develop new Travel Assistance Policies has been carried out in the light of these drivers and constraints; the Policies aim to provide creative but fair and lawful solutions to the need to meet legal obligations relating to Travel Assistance, whilst laying the foundations for a new approach to providing Travel Assistance which will improve the sustainability and long-term financial viability of the service for the benefit of all customers and service users.

Consideration of duties under the Equality Act 2010 with regard to the proposed new Travel Assistance Policies

As part of the initial EIA carried out during the policy development process, and included in a previous report to Members relating to the outcomes from public consultation, the following key points were raised in order to ensure that Members are aware of some key issues which relate to both the Travel Assistance Policy and the Equality Act 2010. These are set out below:

Equality Issue 1: Impact on Under 5s

There is no legal obligation to provide free transport for this age group, but a blanket refusal has the potential to be considered discriminatory (for example, if a four year-old attends a special school some distance from home and could not access education without transport). Impact on children in early years arising from the new policies need to be worked through from an Equality perspective, and the wording of the final policies must demonstrate that public sector Equality duty has been taken into account.

POLICY RESPONSE TO EQUALITY ISSUE 1: The wording in the proposed new statutory school age Travel Assistance Policy (page 11) states:

“There is no statutory duty to provide Travel Assistance for those under the age of 5. The Council may exercise its discretionary power and provide home to school Travel Assistance for children under the age of five on a case-by-case basis.”

This is to state the legal position with regard to Travel Assistance for under 5s, whilst avoiding the negative differential impact which would arise from a blanket refusal and retaining discretionary power to provide Travel Assistance to under 5s on a case-by-case basis.

Equality Issue 2: Travel training

It is reasonable to ask parents and young people to consider travel training, but this should not be a blanket policy. It should be based on individual assessment and tailored to the young person's needs. There may be issues in some areas if times of courses for young people with SEND don't fit in with bus times, for example, and some young people may never manage independent or supported travel by public transport.

POLICY RESPONSE TO EQUALITY ISSUE 2: Independent Travel is not a blanket policy/requirement in either of the proposed new Travel Assistance Policies, but Independent Travel Training is one of several potential options featured in both Travel Assistance Policies that may benefit the child/young person.

The wording on page 10 of the statutory school age Travel Assistance Policy and Page 15 in the post-16 Travel Assistance Policy states:

“The Council is committed to supporting all children and young people to achieve their maximum potential, and become as independent as they are able to be.

In order to better support young people to travel independently, the Council may offer Independent Travel Training (ITT) in their travel assistance offer. The training will support the young person to learn the necessary skills to allow them to effectively deal with and resolve a range of scenarios that they might encounter when travelling on public transport.

A trainer will travel and work with the young person on a 1:1 basis to ensure that the skills taught are understood and put in to practice independently. Training may include:

- Timetables (including time management).
- Orientation.
- Road Safety.
- Accessibility (access to transport, exits and purchasing tickets).
- Communication.
- Personal Safety (including what-if scenarios).
- Travel planning and preparation.

Where the Corporate Transport Unit identify that a young person may have the potential to be supported to travel independently through a travel training programme, a formal assessment will be undertaken to help create a personalised travel plan and identify what training would be required. Training programmes last on average 12 weeks, and the young person will only complete the training once the trainer and the young person, together with their family/carer agree that they have gained the necessary skills to travel on public transport on their own.

Once a young person is deemed capable of independent travel no further Travel Assistance will be offered except in exceptional circumstances.”

Equality Issue 3: Collection Points

Some local authorities now expect parents to take children to pick up points instead of collecting children from home. This is legal but should be based on individual assessments, not a blanket policy. Local authorities have a duty to provide 'non-stressful' transport arrangements.

POLICY RESPONSE TO EQUALITY ISSUE 3: In order to ensure appropriate due regard to the Equality Act and mitigate against negative differential impacts, the Policies make reference to the Council’s responsibilities to ensure collection points are “safe and appropriate”, and subject to individual assessments rather than a blanket policy.

Page 16 of the post-16 Travel Assistance Policy states (emphasis added):

“The Council uses collection points to support the development of independence and preparation for adulthood in our young people. The use of Collection Points also assists the Council to keep journey times for young people to a minimum whilst also minimising timing changes.

The Council will aim to use an approved location near local points of interest as a collection point. This may include libraries, health centres, public Bus Stops, shops, or outside nearby schools or colleges. **Collection points will be individually assessed for suitability to ensure they are safe and appropriate locations for the collection of 1 or more passengers.**

If the young person’s Travel Assistance offer requires them to walk to a collection point, then it is expected that an adult will accompany them where necessary. Collection points will be a reasonable distance from the young person’s home address. We will aim to use collection points that are no more than ½ mile from the home and it is expected that most collection points will be significantly closer. **The distance and location of the collection points for each young person will be individually assessed on a case-by-case basis.**

If a young person is accessing a collection point a parent/carer will be responsible for ensuring that the young person gets safely to and from the collection point at the appropriate time. The parent/carer will also be responsible for them when they are waiting for transport, and when they leave the transport at the end of the day.”

Page 10 of the Statutory School Age Policy states (emphasis added):

“Eligibility for Travel Assistance is assessed based on the pupil’s registered home address, but any transport provided may not necessarily be door to school gate. Local Authorities are able to use reasonable pick-up and drop-off points **in appropriate individual cases.** This may be a bus stop or other place where young people can **safely** wait for their vehicle. The Council aims to ensure there are **safe and appropriate** pick-up points within reasonable distance from schools and centres of population. Pupils can be required to walk to and from a central pick up and/or drop off point. This will usually be within one mile walking distance from the child’s home, **and total walking distance will be within the relevant statutory mile walking distances according to age and ability, and in the light of any identified Special Educational Needs and/or Disabilities.**”

Equality Issue 4: Charging for transport for young people of 6th form age

This is lawful but should avoid indirect discrimination and requires the council to consider the impact on groups with protected characteristics under the Equality Act. For example, the impact on children and young people with SEND, their parents and carers arising from applying the same levels of charge/discount for young people with SEND as for other groups of young people should be considered. The local authority should also take into account that students with SEND may have to travel further to a suitable setting that can meet their needs.

POLICY RESPONSE TO EQUALITY ISSUE 4: The Policies retain the lawful right to apply a charge for Travel Assistance for young people of 6th form age, but clarifies that this is to help contribute towards the costs of the service; that discounts are available for young people eligible for free school meals; and that payments can be made in monthly instalments to make payment more manageable.

Page 9 of the post-16 Policy States:

“If you are assessed as eligible under the Council’s policy, **a charge towards the cost of Travel Assistance** will be applied. Details of the charge for the Academic Year can be found at the following link:

[The link will be inserted in published version of the Policy]

There will be **a discount of 50% for young people who are eligible for free school meals.**

The payment can also be made in **10 monthly instalments.**”

Additional information to note:

Page 7 of the statutory school age Travel Assistance Policy also states:

“The Council promotes equality of opportunity for parents with Disabilities. Where a parent’s Disability prevents them from accompanying their child along a walking route that would otherwise be considered unsafe without adult supervision, a reasonable adjustment might be to provide free home to school Travel Assistance for the child in question.”

Travel Assistance Customer Profile and relevance to the Equality Act 2010

The profile of current utilisation of the service, which shows service users at Primary and Secondary stages, and children and young people with SEND, is set out in Table 1 below:

Table 1: FY21-22 profile of HST/Travel Assistance service users

	Primary	Secondary	SEND	Total
Numbers	80	363	294	737

Table 1 shows that the largest customer group is Secondary mainstream, followed by children and young people with SEND. It is relevant to note that although children and young people with SEND account for just under 40% of HST/Travel Assistance customers, this utilisation accounts for approximately 70% of the total budget for HST/Travel Assistance. It is also relevant to note that in terms of any forecast demand pressures, the potential for increased demand relating to SEND Travel Assistance is by far the most significant driver.

In terms of the Equality Act 2010, Table 1 indicates that when changes to the current Home to School Transport Policy and implementation of the proposed new Travel Assistance Policies are considered, prior to any decision-making the Council will need to have due regard to the potential for impact on service users with protected characteristics such as Age (the Policies relate directly to children and young people and their capacity to access education), and Disability (the Policies have important implications for children and young people with SEND, their parents and carers).

Children and Young People with SEND in Wokingham

The most recently available SEND Improvement Dashboard data shows that there are over 1,250 children and young people with Education Health and Care Plans, and additionally over 2,300 children and young people receiving SEN Support.

It is important to note when assessing Equality Impact, that not all children and young people with SEND will require Travel Assistance. However, when assessing potential Equality Impact, it is useful for Members to review the profile and levels of different types of SEND-related needs across the Wokingham SEND population, to better understand the likely size of the local population that could be particularly affected by any proposed changes to Travel Assistance Policies.

Figure 1 below shows a breakdown of pupils with SEND in Wokingham by primary type of need, as listed currently on the Council for Disabled Children (CDC) data dashboard.

Figure 1: Treemap of primary SEND needs in Wokingham

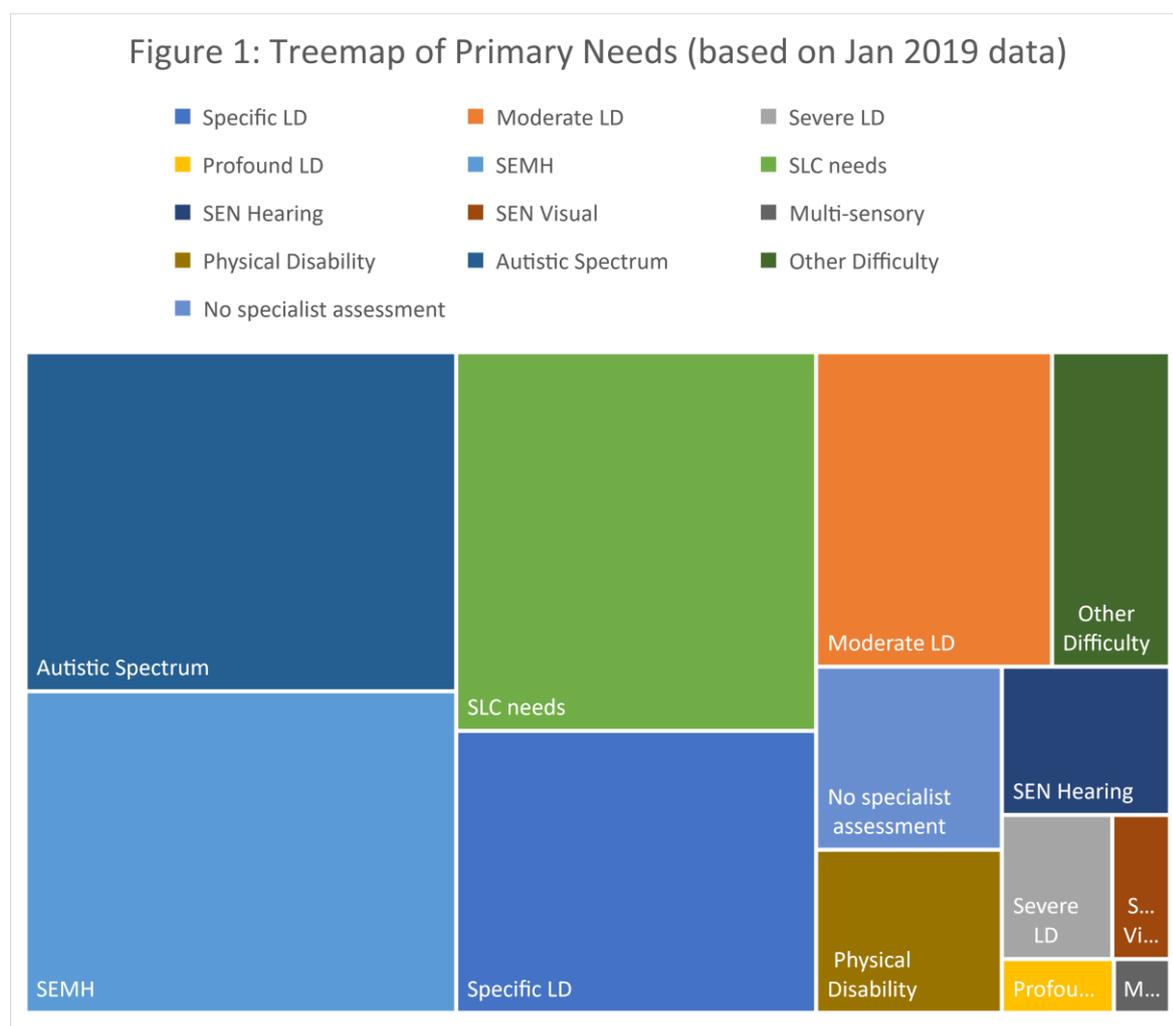


Table 2 shows the number of EHCPs by primary need type for the total EHCP cohort aged 0-25, from 2018-2020.

Table 2: EHCPs by primary need type (2018-20)

Primary Need	2018		2019		2020	
	#	%	#	%	#	%
ASD	342	39	374	40	440	41
Hearing impairment	23	3	26	3	26	2
Moderate LD	96	11	91	10	97	9
Multi-sensory impairment	2	0.2	2	0.2	2	0.2
Other difficulty/disorder	4	0.5	4	0.4	6	0.6
Physical disability	50	6	50	5	53	5
Profound and Multiple LD	33	4	35	4	38	4
SEMH	156	18	170	18	215	20
Severe LD	77	9	89	10	96	9

Speech, Language and Communication needs	60	7	69	7	80	7
Specific LD	20	2	21	2	20	2
Visual impairment	2	0.2	3	0.3	3	0.3
Not recorded	2	0.2	0	0	2	0.2

Table 2 shows that the **top three primary needs** have remained consistent over the past 3 years:

- Autistic Spectrum Disorder (39-41%)
- Social, Emotional and Mental Health (18-20%)
- Moderate Learning Difficulties (9-11%)

Whilst it is important to remember that not all children and young people with SEND will require HST/Travel Assistance, and Travel Assistance requirements vary significantly from one child to another according to their individual needs.

Consultation with the public including stakeholders and service users

Public Consultation with key stakeholders, parents and carers was undertaken between September and November 2020 to understand the potential impacts of the new proposed Travel Assistance Policies, and to understand any changes that may be needed to the consultation drafts prior to submission to elected Members for approval in order to mitigate negative differential impacts.

Consultation drafts of both the new Travel Assistance Policies, and specific questions relating to proposals in the new Policies, were made available through the Council's consultation website. Notification of the consultation, with links to the consultation draft Policies and consultation questions, were sent to current service users, and promoted through Schools and Education networks, the Parent Carer Forum (SEND Voices Wokingham), and the Children with Additional Needs (CAN) Network.

How Consultation Outcomes have informed further development of the proposed new Travel Assistance Policies and report to the Executive

The full Consultation Report has been attached (with this Equality Impact Assessment) to the Report to the Executive which lays out the recommendations for Member decisions.

About the respondents to the public consultation

76 members of the public responded to the formal public consultation on the Council's website between 18th September and 6th November 2020.

Ahead of this date, schools and current service users were notified of the consultation, given appropriate links to the consultation page, and notice of the closing dates. Officers also raised awareness of the consultation through e-newsletters and flagged the consultation in meetings with key stakeholders in the build up to the consultation.

The consultation was promoted through the Council's social media platforms, professional networks including schools, the Parent Carer Forum (SEND Voices Wokingham) network, and the Children with Additional Needs (CAN) Network.

The Council directly contacted service users and sent reminder communications throughout the consultation period.

89% of these were parents of school age children. 77% of respondents reported that their child/children had transport/travel assistance provided by the council; 36% of respondents have transport/travel assistance provided by a parent or carer.

In addition to responses via the public consultation portal, the Council have also received feedback from:

- SEND Voices Wokingham (Wokingham's Parent Carer Forum), Additionally, two focus groups with parents and carers were facilitated by SEND Voices Wokingham (in August and November 2020) and attended by officers developing the consultation drafts of the Travel Assistance Policies
- A formal written response from the Liberal Democrat Group (submitted previously to the Executive as part of the March 2021 report on Travel Assistance Policies)

Feedback from Consultation on options to change discretionary Travel Assistance

A **headline summary** of the key questions and responses relating to options to change discretionary Travel Assistance is set out in Table 3 below:

Table 3: headline summary of key consultation questions and responses relating to options to change discretionary Travel Assistance

Theme	Summary of questions	Summary of responses
Ceasing discretionary transport for children under the age of 5	The council has the option to cease to provide free HST to an infant or primary school for a children under the age of five, where a child is deemed as eligible once they turn 5 years of age – to what extent do you Agree or Disagree with this approach?	64% of respondents Disagreed with ceasing to provide discretionary transport to under 5s who are deemed as eligible once they turn 5. 66% of respondents said they Agreed that the Council should provide discretionary transport to under 5s deemed eligible for transport at the age of 5.
Ceasing discretionary transport for a child turning 8 years	Wokingham has the option to cease to provide HST at the end of the term in which a child turns 8, where the child has been eligible due to living more than 2 miles but less than 3 miles from their nearest school. To what extent do you Agree or Disagree with this Approach?	81% Disagreed with this approach, and 78% said they Agreed that the Council should continue to provide HST to the end of the academic year in which a child turns 8, where the child has been eligible due to living more than 2 miles but less than 3 miles from their nearest school.
Continuing provision for young people aged 17-18 who meet criteria under existing policies	The Council could continue to provide home to school/college travel assistance for young people ages 17-18 who meet the eligibility criteria under our existing policies. To what extent do you agree with this approach?	72% Agreed provision should continue under these circumstances; 75% Disagreed that the Council take up the option to cease to provide ordinarily home to school/college travel assistance for young people ages 17-18 whilst promoting the Student Fare Card Scheme, 16-17 Saver and Disabled Person's Bus Pass Scheme to all post 16 students.

Additional Feedback from Public Consultation

In addition to giving members of the public, service users and professionals the opportunity to give views on specific options as set out in the table above, the consultation also gave respondents an opportunity to give their views on a small number of key issues relating to home to school or college transport, in order to help with further development of the policies and to enable the Council to understand public opinion and perspectives on opportunities to help strengthen the service and improve its overall sustainability and viability.

These subjects included:

- Independent travel
- Collection points
- Use of travel allowances
- Reasonable steps to limit spend on the service
- Existing benefits being taken into account during the assessment process

A summary of the feedback received in response to these thematic areas is set out below:

(a) Feedback on Independent Travel

Questions were asked in the consultation document around Independent Travel, in order to better understand the opportunities, barriers and support required to enable children and young people to be as independent as possible, and travel independently to their place of learning where it is possible for them to do so.

A summary of responses to these questions showed:

1. In terms of **a child's aspirations to travel independently**, 51% said that their aspirations for independent travel included sharing school transport with other children and young people; 48% reported aspiring to being able to carry their own bags and board and alight a vehicle on their own; 45% reported their aspiration as being to travel without a parent or carer in attendance, and 42% reported an aspiration to access transport from a collection point. 31% reported an aspiration to undertake a single journey/route independently using public transport.
2. The **greatest benefits to a child or young person who is successfully supported to travel independently** were reported as being increased self-esteem and confidence (81%), reduced reliance on family members to assist with travel needs (53%), and improved access to employment or vocational opportunities (43%). The **biggest benefits to the family of a young person who is successfully supported to travel independently on public transport** were reported as being family members having time to do their own thing (58%), less need for adults to accompany the young person (49%), reduced dependency financially (47%) and opportunities to access community services (41%).
3. The **greatest barriers** to independent travel via public transport were reported as limited awareness of danger or being unable to keep safe (54%), not being able to manage situations that aren't planned (44%), risk of getting lost or missing the stop (26%) and being able to access services due to poor public transport links (25%).
4. When respondents were asked if a child or young person has the potential to become an independent traveller and would benefit from **independent travel training**, should they be expected to undertake that training, a total of 59% agreed with this (42% Strongly Agreed, 17% Agreed). 26% Disagreed.
5. 73% of respondents thought that **collection points** for some children and young people would be beneficial; when asked how far it is reasonable to ask a child or young person to travel to a collection point, accompanied by an adult

as necessary, 46% said the distance should be based on an individual needs assessment. In terms of suitable collection points, Bus Stops were reported as being the most suitable (67%), followed by suitable road-side locations (44%) and local points of interest e.g. local shops (34%) and near to local schools and nurseries (33%).

6. When asked about whether the Council should encourage more young people and families to use a **travel allowance to make their own arrangements** to travel to school or college, 31% neither agreed nor disagreed with this approach. 38% disagreed, and 28% agreed. The biggest benefits of travel allowances were cited as flexibility to access after school activities (48%), ability to arrange travel around work commitments (43%), ability to arrange travel around family/caring responsibilities (37%) and greater control over travel arrangements (32%). The **top three barriers** to use of a travel allowance were reported as public transport links not being suitable (69%), distance to school or college being too far (48%) and the value of the travel allowance being too low (38%).
7. It is worth noting that feedback received during the focus group sessions with parents and carers also included points relating to the potential for and challenges around independent travel. From these sessions it was clear that “independence” means different things for different children and young people according to their needs and the challenges they face; independence is an aspiration for many children, young people, their parents and carers, but support to children young people and families is needed if those aspirations are to be realised – both in terms of training, some forms of travel assistance, and a partnership/coproduction approach to ensuring that children and young people with SEND are able to access their place(s) of learning.

(b) Feedback on taking reasonable steps to limit spend on the service

The consultation document flagged the level of expenditure on home to school or college transport for children and young people with special educational needs or disabilities, and asked respondents whether they agreed that the Council should take reasonable steps to limit spend on this service. 66% disagreed with this approach, and 12% agreed.

However, the full consultation document report attached as Appendix 3 sets out several suggestions from respondents about how the Council could take reasonable steps to limit spend on this service.

(c) Feedback on taking account of existing benefits into account when assessing transport needs

The consultation document proposed the question:

“Children and young people may be receiving Disability Living Allowance, a Personal Independence Payment, or another form of travel benefit or concession. Ordinarily the

purpose of this benefit is to provide support with travel and access to services and activities. With this in mind, to what extent do you agree or disagree with the following: “Existing travel benefits or support should be one of the factors taken into consideration when assessing if a young person over the age of 16 needs additional support with travel to their education placement.” 41% agreed with this approach, 41% disagreed.

Updates made to the Travel Assistance Policies following formal consultation

Table 4 below provides an overview of the key changes to the Travel Assistance Policies following the formal public consultation:

Table 4: Summary of feedback on consultation drafts of Travel Assistance Policies, and amendments made to the Policies in the light of this feedback

Feedback on Policies from consultation	Amendments and updates made to the Policies as a result
Some sections of the Policies appear to be duplicated / in an inappropriate section of the Policy	Duplications have been removed; structure of the Policies have been updated to ensure the Policies are easier to navigate
Links to points of contact for the Travel Assistance Team should be included in the Policies	Links and appropriate contact details will be included in the published version of the policies
The timetable for applications needs to be clarified and confirmed in the Policies	A web link to the timetable for applications and process for review of allocations of Travel Assistance will be included in the published versions of the Travel Assistance Policies
Clarification is required around eligibility criteria for young people post-16 with SEND in relation to Travel Assistance	Travel Assistance eligibility criteria for young people post 16 with SEND has been set out in a clear Section in the post-16 policy; clarifications have been made around eligibility at sixth form (aged 16-18) and post-19
Consultees requested that the final Policies make it easier for parents, carers and professionals to identify the appropriate eligibility criteria for Travel Assistance	Two Policies (one for statutory school age children, one for young people post-16) have been developed to help parents, carers and professionals to identify and apply the relevant eligibility criteria to applications and assessments. Eligibility criteria is set out in clear sections of each of the proposed new Policies. This approach also reflects feedback undertaken during the initial review of the current HST Policy that eligibility criteria were sometimes hard to identify within a single Policy that aimed to cover children and young people at all ages

<p>Consultees were not in favour of withdrawing discretionary Travel Assistance for children under the age of 5, or at the end of the term in which a child turns 8, where the child has been eligible due to living more than 2 miles but less than 3 miles from their nearest school.</p>	<p>The proposed new policies retain the option to provide discretionary Travel Assistance under these circumstances, but stress that the Council does not have legal obligations to do so.</p> <p>Work undertaken on the Equality Impact Assessment showed that Policy terms which withdrew completely the option for this discretionary Travel Assistance could have a negative differential impact on the Equality Act 2010 protected characteristic "Age".</p> <p>Data modelling showed the numbers of children and young people who would be adversely affected by the decision to withdraw completely this discretionary provision are small; costs of providing under these circumstances are (according to current service user data) <£4k.</p>
<p>Further clarification required about what is meant by Independent Travel and potential support available to support Independent Travel</p>	<p>Definitions of Independent Travel and examples of support in the form of Independent Travel Training are now included in the updated Travel Assistance Policies</p>
<p>Some consultees disagreed that the Council should take into account other benefits (such as provision of a motability vehicle) when assessing eligibility for Travel Assistance for young people with SEND post-19.</p>	<p>The post-16 Policy wording clarifies this point as follows:</p> <p>"Where there is a 'Motability' vehicle available to the student, but a decision has been made not to use the 'Motability' vehicle to support the student to reach their education placement, we would normally expect the carer/student to make their own appropriate alternative arrangements. If this is not possible/reasonable, further details will need to be provided to inform the decision-making process."</p> <p>The Policy also clarifies:</p> <p>"Please note that we would not generally consider work or childcare commitments as an exceptional reason for travel assistance to be provided for young people with SEND aged 16+."</p>

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