

Appendix A

Discretionary School & College Transport – Consultation responses

- *Discrimination against some of the most vulnerable groups in society, this proposal could significantly hinder the educational and future opportunities for nursery and post 16 aged children*
- *Discrimination against poorer families*
- *Cause a great degree of stress to current users and their families*
- *The lack of joined up thinking on the impact that these cost savings will have on the wider Shropshire Council budget in future years is frustrating.*
- *The withdrawal of free transport to SEND nursery students whose needs are unable to be met in any other setting than Severndale – regardless of the family location within the county – is likely to make that attendance a huge challenge for many families and could result in children not receiving the early intervention so vital for their lifelong progress and achievement*
- *My concern relates specifically to the proposed removal of transport for nursery aged children attending Severndale (new applications).
Is this even legal? Children who are allocated those places are needing specialist assessment and support. If their parents cannot afford to transport them to Severndale or have no transport of their own, they won't be able to access the support and assessment that they need. This is grossly unfair.*
- *Having read your proposal, all I can say is what a terrible idea. Families with a disabled child are already having their money cut on universal credit. Children under 5 with disabilities need early educational input to get the most out of the brains learning capacity. Children struggle to get places at ordinary nurseries, they choice is more limited if they have special needs, put an extra barrier of charging for transport in the way and many parents will just give up, their children will miss out and there is potential for the educational cost to increase later. Post 16 education is now a legal requirement, I think charging the rates you do at present are exorbitant and increasing them will prevent these young people from having the choices they want, many children need out of locality places and would not be able to attend without your help. This move will make some families encourage their children to take low paid work as an alternative to education as they simply will not be able to manage. These plans also affect such a small number of children that it is surely not even cost effective to hold a consultation. Once again, the council are targeting the most vulnerable in society, taking the lead from a government that is doing the same.*
- *Early years support is crucial to the development of pre-school aged students and for those with special education needs it is vital that the earlier a child can access education suited to their needs the better. If a nursery aged child is prevented from accessing specialist nursery care due to transport costs this could long term result in a further drain on the support from social services.*
- *We are a rural parish and transport services are key to ensuring that parishioners can access the same levels of service as others in the county.*
- *Nursery age children who go to Severndale special school currently get travel paid but new students will get no funding if these proposals are implemented. This could be very serious for parents with SEND children because Severndale is the only school in Shropshire which caters specially for these children.*
- *Church Stretton Town Council appreciates that Shropshire Council is faced with having to make unpalatable financial savings. However, it is incumbent on the*

Council to make those savings in as fair a way as possible. These proposals load the responsibility for realising these savings disproportionately on just the small number of new pupils requiring education transport, allegedly exempting existing recipients of this service from any change. However, as a matter of fact, it is inconsistent to state, in the proposal, that the lower rate contribution of £142.50 (currently paid by 141 mainstream students) will increase to £437.50 and then to state “The implementation of this proposal would ensure there is no impact on existing pupils.”

The proposed imposition of these greatly increased costs, particularly on pre-school and post 16 children with specialist needs, raises particular concerns as it is widely accepted that existing state allowances do not adequately compensate families for the additional costs consequent upon many forms of disability.

The same applies, to a lesser degree, to the proposed increases in travel costs for mainstream post 16 students. This will disproportionately affect families living in more rural parts of the county, where bus services have already been significantly reduced. Given the Shropshire Council’s policy of wanting to redress the growing demographic imbalance in rural communities, these proposed increases will be a further disincentive to families to live in more rural communities.

- The proposal to withdraw all transport assistance for nursery/pre-school aged students will have a significant impact on all new such students with very specialist or complex needs, especially those living outside of Shrewsbury. Once a child has been assessed as requiring an Education and Health Care Plan (EHCP), the parents have a legal right to make a parental choice of the appropriate educational provision. It is the local experience of St. Lawrence Primary School, which is a “Preferred Provider”, that parents are increasingly opting for more local specialist provision. Greater inclusivity in more local provision is to be applauded. However, there will always be a small minority for whom more specialist provision is needed. Therefore, it is vital that the option of such specialist provision is retained in the “Local Offer” to parents, if their legal right of choice is to be meaningfully upheld. The alternative would be to increase significantly the funding of local specialist provision, which is likely to be much higher than the specialist transport costs for such small numbers (17 currently). If the cost to such families precludes attendance at a specialist nursery, limiting the realisation of their potential, the public cost of their future through life care is likely to be that much greater. It is in everyone’s interests that the potential of those with very specialist needs is optimised in their formative years. It is already increasingly problematic that local specialist provision has to make termly application to Shropshire Council to cover their increased staffing costs. This makes it extremely difficult for such schools to plan, especially given the increasing numbers requiring some degree of specialist provision.
- Given that the Part One Screening assessed the impact as a “Medium Negative at this stage: could be high negative) Impact” in relation to Age, Disability and Social Inclusion, it is surprising that it was not deemed necessary to undertake a full ESI Assessment, as the proposals will have a very high impact on the families affected, especially those with more limited financial means. It is worth noting also that Shropshire already has a significantly higher set of charging rates than those comparable rural authorities listed in the ESI Assessment. That Assessment states that some local authorities do not offer SEND travel assistance or mainstream Post 16 travel assistance, but it does not state whether they are comparable rural authorities.
- ...very concerned that the reduction in travel services will make families who already experience difficulties in their family situation even worse with increased pressures

added to their lives. Access to school transport is already not easily accessed and this will exasperate the situation.

Transport through SEND is a big help for families and the need is great to keep the service. The impact on children of school and college age will be huge.

- *I know that Officers and I hope Councillors are aware of the intense pressure on families in this category. As an elector and council taxpayer I wish Shropshire to do everything possible to help such families, not add to their difficulties. If this means increasing my council tax, so be it to maintain Shropshire as a decent and caring place*
- *...the proposals affecting SEND students, some of the most vulnerable people in our communities, constitute a backwards step for Shropshire County Council. Whilst the proposals would be phased so that existing students would not be affected, the financial impact on the families of new students, both under 5 and post 16, would be disproportionate under these proposals. Families of children with special educational needs and/or disabilities are already under significant financial pressure, such as expensive adaptations for their homes and family vehicles, time off work and travel costs for hospital appointments, and often such families are unable to work full time hours due to the additional needs of their children, which creates additional financial pressures to make ends meet. Accessing SEND provision often involves considerable travel which would add significant cost to families not living locally to that provision, and it may not even prove possible to access the provision using public transport. For many families who are already struggling, they may not be able to afford to transport their children to school, which begs the question of what Shropshire Council proposes to do in these circumstances? Many of these families already feel overwhelmed by concerns about the welfare of their children, in terms of their physical health and emotional well being, but also in terms of their future prospects, so to add another financial burden on top of those concerns is wholly unfair and unacceptable.*

*The result of these proposals would be to actively discourage SEND children from continuing their education post 16, which is not only tantamount to discrimination, but it would also have a long-term knock-on effect on their future employment prospects. Just because an individual has a special educational need and/or disability does not mean that they cannot contribute to society and participate actively in the economy, and many programmes across the USA have shown that supporting education and future employment opportunities for this significantly under-employed demographic has far-reaching, long term benefits for the economy (see the documentary *This Business of Autism*, which is on the official selection list for numerous film festivals including Cannes). By discouraging such individuals from continuing post-16 education, Shropshire Council would be completely undermining the desired outcome of any independence training (like the *Independent Travel* training mentioned above), which would result in increased dependence, as well as a continued reliance on welfare benefits, with a resulting cost to the government and tax-payer.*

- *I strongly believe that intervention at an early age can have the biggest impact on children with special educational needs. Some of the more able students have been*

able to successfully transition to mainstream and many of those joined us at nursery age.

Pupils with SEND cannot always have their needs met in a mainstream provision for example many of our current cohort have medical and behavioural needs, which a mainstream provision would struggle to manage. We are also able to start the foundations of learning and communication systems are already in place.

Mainstream provisions may also need adapting or specialist resources including building work and adaptations to meet pupil needs

Staff in these settings may not have the skill set or knowledge to support pupils and may need extra training or staff to manage the pupils' needs. Also the parents of these children are going through a difficult time coming to terms with their young child's diagnosis and need to feel supported by experienced staff with awareness of their child's needs. The children need time to settle and if they have to transition from a mainstream setting after settling in to join us in reception this can be more difficult for parents and can be a very stressful experience for some children. By attending at nursery age it prevents extra transitions and allows the parents' time to build relationships with school and feel safe and secure in the knowledge that their child is being looked after by people with the specialist skills needed.

Professionals visit these students on site including speech and language, physiotherapists and many others – saving the local authority money and saving these professionals time traveling around settings or parents commuting to various different locations.

Post 16 (Generic feedback)

- *Families will face a considerable and increased financial burden which may result in young people no longer accessing College as parents will simply not be able to get them there*
- *These proposals will affect low income families and could make the difference as to whether a student a student is able to continue their education post 16 or not.*
- *This short-sighted proposal could result in an increase in the number of post 16 residents falling into the NEET (not in education, employment or training) category and ultimately cost the Council more money in the long run albeit from a different budget heading*
- *The proposal is in direct opposition to Shropshire Council's Economic Growth Strategy priority action 4 which states that the Council wants to:*

'Meet skills need of businesses and peoples aspirations for work'

The second paragraph of this priority action states

'We recognise that the Council has a role to play in helping to match the skills needs of existing companies, and future projections of business activity, with training and learning provision from our educational institutions and providers. This will apply through all stages of learning from schools, FE colleges, the HE sectors and adult training providers'

Thomas Adams School considers that the reduction of transport assistance to those students eligible for it will do nothing to help Shropshire Council achieve priority 4 and it will reduce the opportunities for some students.

- *There is a real danger that if these proposals are implemented then more students may choose to leave the County to study. This will further impact on the economy of the County as it could lead to job losses at local sixth forms and colleges if students turn down places.*
- *The system is unsatisfactory where post 16 students are required to remain in education until they are 18, yet there is no provision for transport as currently proposed, this is a particularly expensive issue for parents who live in rural areas where the nearest college/sixth form is many miles away.... those of us living in rural areas are penalised.*
- *One only has to take a look at your map of the south and west of the county which is distant from the available colleges. Long journeys are tiring and unwelcome additions to the school day, and, with very limited (virtually non-existent) alternative public transport services available, restrict the student's participation in the social life of their new colleges. Now there is added to that the transport charge. I would urge the Council to consider carefully whether free or at least more generously subsidised transport should not be provided for students in outlying areas of the county. Failure to do this means, with the removal of local post 16 provision, such students are not enjoying equal opportunities to continue their education. To offer fuller support would be some recognition of the difficulties facing those who live long distances from Colleges but who wish to pursue their studies.*
- *Appreciate the challenging economic implications of this are challenging but feel most strongly that encouraging young people living 'on the fringes' to continue their studies is of paramount importance and a basic duty of a rural county like Shropshire*
- *The changes would have a negative and discriminatory impact on young people living outside the main towns in the county who wanted to continue their education at sixth form or college. Young people from Ellesmere have no choice but to travel to Oswestry, Wem, Whitchurch or Shrewsbury (all more than 3 miles away) to gain access to further education, and as such a large increase in the cost of travel could deter some students and impact disproportionately on less well-off families. Even Shropshire Council's own equality assessment says that the impact may be deemed high negative.*
- *I completely understand the need for the treasury to tighten its belt and for local authorities to do the same. What I see happening though is that this is not joined up and the same band of people (16 to 19 year olds) are being hit from all sides: no EMA (understandable although still available in Wales), frozen educational funding (a frequent topic of conversation between us) and now a squeeze on transport support which will inevitably lead to many disappearing.*
- *I write to oppose the proposed increase in charges for around 140 young people who have to travel more than 3 miles to post-16 places of study from £142.50 to £437.50 p.a. I consider that there is a high risk that some young people or their families will calculate that running a car is suddenly less uneconomic. This could affect their travel behaviour for years to come, & not just for getting to college, once taking the car becomes a habit. If this leads to less young people using local buses, then routes will struggle to keep going even more than now. Congestion, CO2 emission and parking problems will keep getting worse. We need to be move in entirely the opposite direction, but for now, to meet our commitments to sustainable transport*

and reduced CO2 emissions this policy proposal needs to be withdrawn, at least until a risk assessment regarding CO2 emission and the impact on sustainable transport is carried out.

- *I strongly object to the principle of such students being charged for transport. The law says that they must attend full-time training or education until aged 18 years. Yet they then have to pay to get there – to me that is a fundamental breach of equity and the rule of law. Particularly hard hit are low-income parents (or single parents) of students who live in very rural areas but where the nearest college is, say, 20 miles away.*
- *This is outrageous, if it goes up to over £400 a year then I won't be able to afford to transport my child to college next year. Government says children should stay in full time education till 18, transport should be free. I think a lot of low income families will be in up roar.*
- *With regard to the proposal to alter the post 16 FE travel contributions - my concern is that £875 a year is a huge contribution for many families, especially as post 16 education is compulsory, therefore there is no choice for families. We pay £875, have a reasonable household income and we are struggling. So, for those children in lower income families, it must be impossible. This will surely affect attendance, especially on days when students may only have a couple of hours of lessons. Parents who cannot afford the annual pass, are more likely to support non-attendance to avoid paying the daily bus fayre (of nearly £15 a day from somewhere like Bishops Castle). It means that rural children are further disadvantaged compared to those living in Shrewsbury.*
- *Shrewsbury Colleges Group has the largest provision of post 16 education in the county and serves a large number of students who travel in order to access the course offer, the high levels of delivery and the excellent results as well as all the enrichment and opportunities to ensure positive destinations are secured. Students travel from the local catchment area as well as from all areas of the county and beyond
The proposed changes to transport assistance would affect all families that live over 3 miles away from the college and whose income is less than £16,190. We currently support 46 students with the purchase of a council travel pass this type of pass through the student bursary.
The price increase for this number would add an additional £14,000 per year based on this year's applicants. This means we would have to say no to a high number of other students who need financial assistance to get to college as the bursary allocation for the college is set annually by the ESFA. We are unable to request more from the ESFA.
We encourage families to purchase the pass over the summer holidays to ensure they have it time for students starting in September and we then reimburse them once they have enrolled. These families are going to struggle to find such a large amount of money upfront and it will cause delays in them receiving their travel passes and able to attend college and will put many people off attending which will add to the NEETS numbers.
Introducing the price structure for students with SEND will affect a high number of students who need to travel to access the breadth of college provision to enable them to progress and develop independence and secure positive destinations. The SEND student numbers will make the bursary allocation even more thinly spread and have wider and greater impact across all post 16 families.*

Shrewsbury Colleges Group recommends you do not make this change as it will unfairly disadvantage those already classed as disadvantaged.

- *My 2 children Both use daily bus service to Shrewsbury college and both have council subsidised Arriva bus pass. They must be 2 of the 141 pupils who paid the lower contribution of £142.50 x 2 =£285 in total. The proposal to raise this huge jump cost to £437.50 will make it impossible for me to afford x 2 children totalling at £875. I am a single parent earning £9,000 approx. this tax yr and estimate £11,000 next yr (as have new job of more hrs.) I would have to consider my children not continuing their courses as simply cannot afford such a jump in cost.*
- *This Parish Council is concerned that the proposed increase will negatively impact low income families in the Parish who have no option, but to use the bus services to access Sixth Form and Colleges in Shrewsbury and Ludlow, as there is currently no local provision for Post 16 education. This parish Council would like to point out that bus passes issued for the same money do not allow for the same usage on all routes. Some passes can be used 7 days a week all year and others only 5 days a week during term time. Consistency on policy and usage across the country should be introduced as residents in the rural areas are again being negatively impacted.*
- *The proposed increase in parental contribution to travel costs for post 16 students could seriously affect the ability of some students from Clungunford to complete their post 16 education. All live more than 3 miles from the nearest college.*
- *....the proposed new charges for all such students, old and new, in that they would face a substantial increase of at least £295 as from September, that their parents would not have been anticipating. Relative to the increased costs that others are facing, owing to the service cutbacks, this immediate increase is disproportionately high and should be phased in at a more gradual rate for all such students.*
-

Post 16 (SEND student specific feedback)

- *These proposals are aimed at some of the County's most vulnerable residents. Financial support in terms of travel assistance is vitally important to these students and their families. It is crucial that post 16 SEND students continue to be given free transport to enable them to access support and training which in turn will help them gain confidence and skills so that ultimately, they will need less support as adults and enable them to gain employment.*
- *Any savings made through these proposals will ultimately result in long term increase in costs from the adult social care budget due to the fact if a SEND student has been prevented from accessing education post 16 they will have missed out on an important part of their education and consequently will have to rely more heavily in the future on the support of social services*
- *Understand the need for Shropshire Council to make savings but feel that to target the most vulnerable members of society in this way is wholly unjustified and is more than a tax on and a disincentive to learning. A joined-up approach to cost savings must be taken and the impact of proposals to cut costs must be considered holistically across all departments not by individual departments.*
- *We deplore the way Shropshire Council is discriminating against vulnerable and poorer families*
- *We wish to strongly oppose the changes, as outlined, that it is considered will impact on the less well off, the vulnerable and those with social mobility difficulties*

- *I am writing to you full of concern, about our local authority proposals of the cutbacks to SEN transportation.*

I have a son who is 13yrs old, with an EHCP and attends a specialist school in Staffordshire. He is unable to attend mainstream schools, due to his Autism, Sensory processing disorder and high anxieties and they can't provide or meet his needs.

There are no public transport and I can't drive, so he is provided a taxi for transportation.

His specialist school provides post16 and I am hoping that when he reaches this age, he will go onto further education there. I am aware that by law, he needs to stay in full time education until then, but because he is SEN can access further education until the age of 25yrs.

If these cutbacks go ahead, it means my son will not be able to access education at post16 as I won't be able to afford the transportation costs. I am in receipt of Carers Allowance topped up by Income Support. My son gets DLA until it switches over to PIP (and that's another battle in itself).

Surely without him being able to access education, providing his rights and to meet his needs, this is classed as discrimination?

As it is, it's so unfair that I should always have to battle and fight for the needs of my son. You just end one battle when you have to start on another battle. And it becomes tiring, time should be spent in enjoying my son and helping him to become the best that he is.

- *The withdrawal of free transport to Post 16 SEND students to the provision identified as being able to meet their needs and promote their best outcomes is also likely to have a very significant negative impact, to add to the already limited options available for such students in our county. Travel training will benefit a very small minority due to their capacity and limited independence skills – but also due to public transport provision in our predominantly rural county (my own school has no public transport links at all)*
- *My daughter is 13 and has Down's Syndrome. I am very concerned about the post 16 SEND Transport proposals. It will directly affect her future education, contribution to society and reduce her independence. We are a low-income family who live in rural north Shropshire, so my daughter has no local post 16 education provision. This means she will rely on transport to access any further education. As a low-income family, we could not afford to pay the contributions stated in the consultation. Surely this is preventing my daughter's inclusion within society and increasing inequality by making it impossible for her to access further education. My daughter deserves to for-fill her ambitions and is entitled to further education. As my daughter cannot access post 16 education locally she will need transport that we cannot afford, this is discrimination and will have an impact on the rest of her life. My daughter tries so hard at everything she does and loves to learn new things. If this became impossible then it would not only affect her ability but also her mental health. It is a known fact that young people with Down's Syndrome carry on developing later than their typically developing cohort. This makes post 16 education even more vital. My daughter has ambitions to live independently to work and get married. Without access to further education this will not happen. Are you, the council, prepared to jeopardise my daughters future?*
- *Local SEND post-16 students often have to travel long distances, and family income can be low because parents have to work less hours to cater for child-care needs.*
- *Wherever possible, it is accepted that travel training for such students is of most benefit in preparing for a more independent life. However, with the progressive withdrawal of rural bus services, that option is less available to most in rural communities. Given the imperative to make financial savings, it is appreciated that*

perhaps families of post-16 SEND students should make some financial contribution to their transport costs. However, it is inequitable for existing families to pay nothing and new families to pay either £437.50 or £875 per year. This year, finding that money would be at less than three months' notice! It would be fairer if all families, old and new, were required to pay gradually increased contributions according to their financial means. This would follow a previous precedent, adopted by the Council in respect of other increased charges, when it was agreed, post consultation, to phase in the new charges.

Shropshire's Parent and Carer Council (PACC) met with Cllr Nick Bardsley, following this meeting they have sent the following:

What difference does free SEND transport to nursery and Post 16 settings make to Shropshire SEND families?

'That I could go and pick up my other children from school. Nursery was Severndale, my other son was in school in Wellington and I couldn't be in two places at the same time. It was also extremely difficult to take my ASD son to pick up his brother because of his challenging behaviour; transport meant we avoided daily meltdowns.'

Distance travelled to nursery: 6 miles

'Rachel was able to attend CDC nursery with the help of transport. Not being able to drive myself, meant that Rachel wouldn't have been able to go to nursery and get the specialist help and support she needed.'

Distance travelled to nursery: 3 miles

'My daughter got the specialist services at Severndale Nursery, as she couldn't walk or talk. The local nursery would not have coped with her needs and confirmed this. As she was a twin no-way I could have taken her to the specialist nursery. Having given up my career to care for a disabled child I could not have financed the travel cost.'

Distance travelled to nursery: 25 miles (one way)

'Less financial pressure (cost of fuel), enhanced mental and physical well-being of myself and helped my son transition to school'

Distance travelled: 25 miles

A ' Stress free experience for me and son. Son is not able to negotiate public transport. I am not able to drive and financially we couldn't afford a second car in the household – because I can't work due to son not being in full time provision. Driving would have involved a 40 mile round trip twice a day.'

Distance travelled to Post 16 Site: 20 miles

'It has enabled my son to choose the course and career of his choice. Had he not been given free transport, he would have had a very limited choice which was not appropriate to his level of skills and qualifications.'

Distance travelled to Post 16 Site: 25 miles

'Transport allowed my son and daughter to access the college and course to suit their needs. As a carer of 3 disabled children, I've had to give up my career and there is no way I could finance travel to college.'

Distance travelled to Post 16 Site: 30 miles (round trip).

'If they start charging for transport after 16 then my 11year daughter will not be able to attend Severndale as we live just outside Market Drayton and I definitely cannot afford transportation prices, I wouldn't be able to take her and pick her up as I have younger child in our local school we can't be in 2places at once.'

'Having the transport for my son has been essential, for independence etc and taking the worry out of it. How much more pressure is going be put on the parents having to pay and organise something else? All ready no short breaks services in Shropshire, how much more pressure can parents take to cut costs and it would be money for us, one wage and already paying out for extras like wheelchair tyres repairs etc'

Distance travelled: 25 miles

A ' Stress free experience for me and son. Son is not able to negotiate public transport. I am not able to drive and financially we couldn't afford a second car in the household – because I can't work due to son not being in full time provision. Driving would have involved a 40 mile round trip twice a day.'

Distance travelled to Post 16 Site: 20 miles

'It has enabled my son to choose the course and career of his choice. Had he not been given free transport, he would have had a very limited choice which was not appropriate to his level of skills and qualifications.'

Distance travelled to Post 16 Site: 25 miles

'Transport allowed my son and daughter to access the college and course to suit their needs. As a carer of 3 disabled children, I've had to give up my career and there is no way I could finance travel to college.'

Distance travelled to Post 16 Site: 30 miles (round trip).

'If they start charging for transport after 16 then my 11year daughter will not be able to attend Severndale as we live just outside Market Drayton and I definitely cannot afford transportation prices, I wouldn't be able to take her and pick her up as I have younger child in our local school we can't be in 2places at once.'

'Having the transport for my son has been essential, for independence etc and taking the worry out of it. How much more pressure is going be put on the parents having to pay and organise something else? All ready no short breaks services in Shropshire, how much more pressure can parents take to cut costs and it would be money for us, one wage and already paying out for extras like wheelchair tyres repairs etc'

Distance travelled to Post 16 Site: Shrewsbury to Oswestry

'Thank you for the opportunity to comment. It has been life changing for my daughter to have an education placement which fully meets her needs and has fostered independence. As a single parent caring for my daughter primarily and also now my elderly mother with Parkinson's I have had to give up part time employment. We are immensely grateful for the school transport service which has greatly helped in developing travel, social and independent living skills. Financially we would really struggle and our situation will be pushed into hardship if charges are introduced.'

My daughter is 17 and taking GCSEs (had a disrupted few years until the special education placement hence year older than year 11s - we are really grateful for the placement continuing and she is staying on for a levels). Journey time is 1 hour each way.'

'My son is 8years old in August. He was 4 years of age when he started using transport. If we had to pay for the transport it would reduce our disposable single income drastically and would cause massive financial stress upon the family.'

We would struggle to live a simple lifestyle that is already difficult due to the stress levels of caring for a disabled child and the isolation. It really doesn't bear thinking about... as unsure where we could cut back ...

Also it would take two hours of my day to take George to school and would cost around £30.00 a week in fuel... not taking into account maintenance and depreciation of the car used.'

It is clear from the responses above that the provision of free SEND transport is a valuable service that helps to maintain family resilience and improves outcomes for their children with additional needs. All of which would be put at risk if this provision was removed or became chargeable.

This is further evidenced by findings of the **Contact School Transport Inquiry**

<https://contact.org.uk/get-involved/campaigns-research/school-transport-inquiry/> (2017/18) and the recognition that the current legislation does not support the new 'Participation' requirements, which expect young people to be in education or training up to the age of 18. The School Transport Inquiry states that school transport is an integral part of a child's education. If a child can't get to school or has a stressful experience getting to school, they are not able to learn and take part in the school day like other children. The report identifies that where transport is not provided it places families under greater financial strain, in most cases as a result of parents having to reduce work hours. In these circumstances, families report an increase in stress levels and a reduction in the independence of their disabled child. It should also be noted that national evidence shows that disabled pupils / students nearest suitable nursery / college may not be the local nursery or college. It may be some distance from their home and therefore travel costs might be higher. This also means that travel times are likely to be longer meaning, so there is a greater impact on the family if they have to transport their child to a nursery or Post 16 setting.

In addition to highlighting the negative impact on families of removing free SEND transport for nursery or Post 16 pupils, Contact's report also states;

"The introduction of a charging policy may be within the law as far as transport law goes. However, a local council may be failing in their duty under the Equality Act to:

'advance equality of opportunity for disabled learners'

if the charge in their transport policy has a:

'significant negative impact on the ability of disabled students to access education'."

The Report concludes that;

"Families with disabled children often face significant additional challenges in their daily lives, and the difficulty of obtaining suitable transport to school or college is adding to this. Unsuitable transport is affecting children or young people's wellbeing and progress in education, as well as family life. The cost of school transport for some is causing additional financial hardship. Many parents are unable to work due to the need to make school transport arrangements for their child. Families with disabled children face additional challenges around school transport not experienced by other families including:

- ***disabled children may go to different schools to siblings – requiring separate journeys and pick up times disabled young people may need longer to complete their education – so families are bearing the cost of transport for longer***
- ***lack of local specialist provision for disabled children and young people. This often means they are travelling further to their nearest suitable place of education – families struggle to provide transport as it is more expensive and time consuming."***

As a result of the Inquiry the Secretary of State for Education has announced plans to review school transport statutory guidance to make sure all local authorities are providing school travel for eligible disabled children. The need for this was further supported in March 2019 by an **Early Day Motion tabled by Stephen Lloyd MP** <https://edm.parliament.uk/early-day-motion/52648/school-transport-for-disabled-young-people>

The legality of the current situation and proposed reductions in transport provision for nursery and Post 16 aged children and young people is also being examined in the Courts.

<https://contact.org.uk/news-and-blogs/school-transport-jr/>

<https://www.leicestermercury.co.uk/news/local-news/hundreds-desperate-families-fight-changes-2754231>

All of this is in the wider context of the recognised additional responsibility and costs experienced by families when they raise a disabled child. This is evidenced in **Contact's 'Counting the Costs survey and report 2018** <https://www.contact.org.uk/get-involved/campaigns-research/counting-the-costs-2018/> . The key finding of the survey showed that;
33 per cent of families have extra disability and care related costs of £300+ per month.

40 per cent of disabled children are going without birthday and Christmas presents; 26 per cent are going without essential therapies.

26 per cent of parents said their child's condition has worsened due to going without basics (up 4 per cent since 2014).

33 per cent have taken out a loan to pay for food (compared to only 4 per cent a decade ago).

36 per cent said that changes to the benefits system in the past two years have left their family worse off.

It is clear to see that the changes proposed by Shropshire Council to the current SEND transport provision will further disadvantage the already vulnerable families of children and young people with SEND and therefore will have a high negative impact on the families affected.

With this in mind it is a concern therefore that the **Equality and Social Inclusion Impact Assessment** <https://shropshire.gov.uk/media/12260/esia-part-one.pdf> produced by Shropshire Council fails to recognise any of these issues.

The issues identified by the ESIIA are limited and do not reflect the true impact of this proposal on Shropshire SEND families if they are implemented. Most of the document is taken up with a description of what has happened in other areas in regard to SEND transport, which while might be of interest, does not explore the potential impact on Shropshire SEND families.

Shropshire SEND families face specific difficulties due to a combination of geographical and demographical factors. It is a large rural area, with a very disperse population including a relatively small number of SEND children and young people spread across the county area. These factors are further exacerbated by the fact that, very unusually, the local area is only served by two special schools, with the majority of children and young people with complex needs attending Severndale Academy in Shrewsbury. This means that for some young people the travel distance to nursery or school is significant. Many students stay at Severndale until the year in which they are 19 and therefore some young people continue to have significant journeys Post 16.

The Shropshire Council ESIIA does recognise the issue of the lack of local provision in terms of nurseries who can meet the need of young people with SEND. The 'preferred provider' scheme introduced by Shropshire Council and supported by PACC, has improved the availability of local nursery provision for children with additional needs in Shropshire, but it is very unlikely that this scheme will remove the need totally for some young people to attend Severndale nursery, where a higher level of specialist care can be provided, including medical care if needed. If the new SEND Transport proposals are implemented it would severely disadvantage those young people whose needs, for no fault of their own, can not be met in their own community. It also potentially removes the element of choice from families to choose between using a specialist or mainstream setting.

It should also be considered that the 'preferred provider' scheme is only reasonably new and has been introduced into a sector that is in a state of flux. Already two of the 'preferred provider' have closed and it is possible that others might follow due to the impact of the free 30 hours child care entitlement. Neil Leitch, chief executive of the Pre-school Learning Alliance's, commented on current CEEDA research;

“Unfortunately this is an inevitable consequence of a situation where, according to sector experts Ceeda, more than two in every five (44 per cent) childcare providers have seen their funding fall in real-terms in the last five years. This has meant that funded places for two-year-olds – which are more expensive to run – have become too costly for providers already struggling to stay open and reliant on parents who are able to afford “voluntary” charges to make up the funding shortfall.”

It would seem premature to conclude that demand for Severndale Nursery will continue to reduce or that the needs of the majority of younger children with complex needs, can be met in their own community.

Summary

- **Shropshire SEND Families are clear that free SEND transport to nursery and Post 16 settings has been an essential element in enabling their child to receive the support they need and has made a positive contribution to their family’s ability to continue to operate. The proposed changes to Shropshire SEND Transport is highly likely to negatively impact the resilience of Shropshire families of disabled children and young people.**

- **SEND Families in general are known to be financially vulnerable and would face further financial hardship if additional transport costs were placed upon them. Since SEND families often have to travel further to nursery or Post 16 settings than none SEND families, these additional costs are likely to be higher than for families who do not support a disabled child.**

- **Many SEND families are financially vulnerable because they have reduced capacity for both parents to work due to the caring role. These proposed changes to SEND transport provision are likely to reduce parent carers capacity to work even further and place SEND families under further financial stress.**

- **Transport provision provides an element of independence for children and young people with SEND, reducing their dependency on their parent carers and providing a positive experience of developing relationships outside of their immediate family. The proposed changes to Shropshire SEND transport provision will take away this opportunity for many children and young people with SEND.**

- **In many cases SEND families have children that at different nurseries / schools, with children in both mainstream and specialist settings. In Shropshire because the main specialist nursery or Post 16 provision is in Shrewsbury only, the distance between these settings can be significant. The proposed SEND transport changes potentially make it physically impossible for parent carers to get all of their children to school as required.**

- **There is a national recognition that there is a legal loop hole in SEND transport legislation, that does not align with the required ‘participation’ age of 18, however equality duties do require disabled learners to be able to access education to the same extent as their non-disabled peers. These proposed changes to SEND transport provision in Shropshire place this equality at risk.**

- **The ESIIA Report produced by Shropshire Council fails to identify key issues facing Shropshire SEND families in relation to the proposed changes to SEND transport provision and is therefore incomplete. The decision that a ‘Part One ESIIA Only’ is required is not sufficiently evidenced and not accepted by PACC.**

PACC recognises that Shropshire Council is currently facing financial challenges and needs to consider all options to reduce expenditure. PACC however believes that the proposed changes to SEND transport is short sighted and while it might deliver a short term reduction in costs, in the long

term it will decrease family resilience and reduce the independence of young people with SEND, meaning that they will need more support from services in the future.

Shropshire Council has shown a significant commitment to supporting SEND families in the past and PACC has acknowledge this positive approach to improving outcomes for children and young people with SEND. This approach is captured in the vision articulated in the Shropshire SEND Strategy; *Our vision sees Shropshire children and young people with SEND that are healthy, happy and safe, and able to achieve their full potential with support from a strong partnership between families, the voluntary sector and service commissioners.*

[https://shropshire.gov.uk/committee-](https://shropshire.gov.uk/committee-services/documents/s13829/9%20Appendix%20A%20SEND%20STRATEGY%202016.pdf)

[services/documents/s13829/9%20Appendix%20A%20SEND%20STRATEGY%202016.pdf](https://shropshire.gov.uk/committee-services/documents/s13829/9%20Appendix%20A%20SEND%20STRATEGY%202016.pdf)

It would be disappointing in the extreme if a change to service provision was introduced, that would so clearly reduce the opportunity for children and young people with SEND to achieve their full potential and which is so clearly not based in working in partnership with families.

PACC thanks all Shropshire parent carers who contributed to this response. If you have any questions about this documents please contact PACC via enquiries@paccshropshire.org.uk