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Consultation Responses – Home to School Transport Policy

A consultation has been carried out from 4 December 2023 to 26 January 2024 to seek views on the Council's proposed Home to School Transport Policy. This policy has been reviewed and updated following the DfE issuing new statutory guidance in June 2023.

Consultation responses were invited by emailing school.transport@calderdale.gov.uk

A total of 16 responses have been received, and these are shown below:

No.	Consultation response	CMBC reply
01	Please could you confirm if the consultation could lead to the cancellation of the C96/C98 service that transports children for hilltop villages to Castle Hill and Todmorden High? I have read the attached document and unless I'm missing something it is not clear about rural children on specific routes.	The consultation is specifically in relating to Home to School Transport Policy. This is in no way connected to any specific routes. If there was a requirement for the services mentioned to be changed, you will be consulted with directly.
02	I am contacting you regarding the proposed home to school transport policy. I wonder if you could confirm that the bus routes to Castle Hill Primary School, Todmorden and Todmorden High school (C96/C98 bus service) are not affected by this consultation. I have had numerous worried parents contacting me and the policy isn't specific regarding routes. The bus service is integral to our families enabling children to attend their local schools.	West Yorkshire Combined Authority (Metro) commission buses on behalf of Calderdale and if they planned to remove specific services, they would be carrying out a consultation.
03	A consultation has gone out to parents re the Harvelin Park bus that has alarmed quite a few. Consequently, they are asking school about it.....	The local authority is consulting on a proposed new Home to School Transport Policy following updated statutory guidance being issued by the DfE. This however is not specific to the services noted below. I have copied in West Yorkshire Combined Authority, as if there is a consultation underway

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		potentially affecting the Harvelin Park service, they will be better informed to advise.
04	<p>Why is it not possible for blue buses to take students from Spring Hall site to Skircoat Green, for after school clubs?</p> <p>As you may be aware, some students have been moved to Spring Hall due to overcrowding at Skircoat Green. As some after school clubs are still held at Skircoat Green, parents/carers have been told that they are responsible for taking students to the after school clubs.</p> <p>Obviously this makes it impossible for some parents/carers to get their children to these clubs.</p> <p>What I find ridiculous is that the blue and white buses call at Spring Hall FIRST and then go to Skircoat Green so it wouldn't make any difference for transport to take the students to the after school clubs.</p> <p>What is the issue here and why can't you take these students from Spring Hall to Skircoat Green? Please advise.</p>	<p>Thank you for your email.</p> <p>I will ensure your view is included within the cabinet report which will be submitted to Council for approval.</p> <p>In the meantime, I have noted your comments regarding the buses going to Spring Hall First – they are actually split.</p> <p>We have 21 buses going to Ravenscliffe and some pick up at Skircoat first then head to Spring Hall, and vice versa.</p>
05	<p>Please can you clarify if the primary school is a feeder school for a secondary which is not the nearest secondary school would the child still qualify for free transport?</p> <p>'Why are schools feeder school for secondary school which are not the nearest secondary school has this been set up as the nearer schools can't accommodate all the children in the area? Would this then mean a child would be eligible for free transport?'</p>	<p>This would be dependent on whether low income criteria is being considered (eg if registered for free school meals, and attending one of the three nearest schools).</p> <p>Feeder school status is generally consulted upon by the Secondary School. For further information relating to this, please contact the school admissions team on cyps.admissions@calderdale.gov.uk. Feeder status has no bearing on eligibility for transport assistance. The criteria would still apply (ie 1 of 3 nearest available schools if low income criteria applies, or nearest available school over 3 miles if not low income family)</p>

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	<p>'I have twin boys who have ASD and the secondary school which our primary school is a feeder school for is not the closest but has a good SEND would they qualify for free transport?'</p> <p>'A lot of families are struggling with the cost of living crisis even if both parents are working and contributing tax to the country. Why shouldn't our children be able to get free transport to any school in calderdale like the children on free school meals?'</p> <p>'Currently the bus to Rastrick from Northowram is £88 a month which is very expensive. A cost which is double for parents with 2 children/twins £176. Northowram is a feeder school for Rastrick, so why are parents being ask to pay so much a month to get our children there?'</p>	<p>The feeder status of a school is not a contributory factor in transport assistance eligibility. If the boys both had EHCP's in place, assistance would be provided to whichever school is named within section I of the EHCP, subject to the 2/3 miles limit.</p> <p>Local authorities have limited budgets and eligibility criteria within CMBC's policy is in line with government guidance. Where an application is refused due to not being eligible, parents have the right to appeal.</p> <p>I am unsure which bus service is being used, but Metro offer a subsidised bus pass for a cost of £9 per week or £35 per month. This allows for travel on public service buses.</p>
06	<p>I have read the email regarding transport and have a few concerns regarding eligibility. My main concern is as working parents we wouldn't be able to drop our child off to school due to work commitments and our other children (another special needs child) attending different schools. I understand that this has been highlighted in your policy stating other commitments should not interfere with my responsibility as a parent and an employee. I do not agree with this because my child is autistic and mute and is highly dependent on this service you provide as this has been his routine for many years. This service has enabled us to work and</p>	<p>Thank you for your email.</p> <p>I will ensure your comments are included within the report following closure of the consultation period.</p> <p>In the meantime, I can confirm that there is no change to the current eligibility criteria, the proposed policy just provides more clarity.</p>

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	<p>not be stay at home parents. Worst case senerio would be one of us leaving our jobs to fulfil the above, leaving us in a dire situation, and financially. Me and my husband would be very disappointed if this was to be. My sons soon to be secondary school is about 2.4 miles and would be best suited for his additional needs and a chance for him to grow in the best environment possible. I hope you take into account parents views, opinions and most importantly circumstances, into consideration before any new rulings commence. I hope each case is awarded on its own merit. I would like my situation to be looked at, through a parents eyes and would prefer the transport as it is . Not providing transport or tweaking situations/ circumstances could lead to my son not attending the school that meets his needs which of course would be have an impact on his learning and mental wellbeing. I appeal that the current policy of providing transport stays the same as this would benefit my family and many other families who are highly dependent on this service.</p>	<p>Each application is assessed in line with the policy, and if a parent is refused assistance, they are given their right to appeal. The Service Manager with discretion to make an award outside of policy, will give consideration to all personal circumstances that are raised during the appeals process. With regards to your son moving to secondary school, I am unable to confirm at this time whether or not he would be eligible. This would need to be confirmed through assessment of a new application, which will be available after 1st March 2024. Thank you for your time in responding.</p>
07	<p>I would like to know will my child still be eligible for transport in September 2024/2025 as my daughter attends Ravenscliffe Skircoat Green</p>	<p>Good Afternoon There is no change to the eligibility criteria, just more clarification. Where a student is eligible under the existing policy, this is likely to remain the case providing there were no changes in circumstances, such as change of school, move from Year 11 into Post 16 education, move from Y6 to secondary school, change of address, low income criteria if relevant. I'm afraid I can't specifically confirm transport arrangement for your child at this stage, without a formal application and assessment taking place. Thank you for your time in responding to the consultation.</p>

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08	<p>I don't know how I am supposed to provide feedback on the proposed transport policy without being informed what the changes to the policy are? You've not included the current policy to compare it to but even if you had these are large documents and it's unrealistic to expect parents to be able to go through them in detail to examine what the changes are.</p> <p>It would be useful to be given a brief summary on what the proposed changes to the policy are.</p> <p>How are we supposed to give you feedback without it being clear what the changes are?</p>	<p>Thank you for your email.</p> <p>Unfortunately resource does not allow for a comparison between policies to be provided at this time.</p> <p>However, I can confirm that there is no change to the eligibility criteria being proposed. The proposed policy is to provide better clarity for parents/carers.</p> <p>I will ensure that your response is included within the report submitted following closure of the consultation period.</p>
09	<p>Thank you for the opportunity to comment on the new draft policy. I would like to offer the following comments:</p> <p>There is no mention of eligibility for assistance for children who do not meet the threshold due to additional needs/disability but are from a low income home until section 19. It is not explained until section 20. Suggestion:</p> <p><i>Put a summary at the start of the document to make it clear the policy is to offer assistance with travel to (a) eligible children with disabilities and additional needs or (b) children from a home with low income</i></p> <p>The definition of 'low income' for assistance with school transport purposes is not clear. The criteria if you are in receipt of Tax Credit on CMBC's website is good. However, Tax Credit recipients are now being 'migrated' over to Universal Credit in Calderdale. This started Autumn 2023. By the time this policy goes live there will be few, if any, families still getting this benefit.</p>	<p>I confirm safe receipt of your email and advise that your comments will be included within the report following closure of the consultation period.</p> <p>Regarding low income, this definition is included within Section 23. Glossary (shown below). If an application is refused due to not meeting this criteria, the parent will be given their right of appeal. The Service Manager with discretion to award assistance outside of policy will be able to consider the individual circumstances of the child/family, including income.</p> <p>Low income criteria (Extended rights):</p>

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	<p>Is the only other way to qualify on the grounds of low income receipt of Free School Meals - this is implicit? What about if you are in receipt of Universal Credit and your annual income is just above the £7,400 cut off for FSM? Is Calderdale simply using eligibility for FSM as the criteria? If so, suggest inserting a simple sentence to make this clear, bearing in mind a good proportion of Universal Credit recipients will be claiming this as an in-work benefit. Or is there an upper earned income limit? Perhaps put a link to the assessment criteria to define 'low income' for the purposes on entitlement to a zero fare pass and explain how it is calculated on the webpage?</p> <p>I would be grateful if you could confirm receipt of this email.</p>	<p>Any child who is registered for Free School Meals or a parent who is in receipt of the maximum level of working tax credits (or the Universal Credit equivalent, where the income of the parent is less than £7400)</p> <p>Thank you for taking the time to provide this feedback. It is much appreciated.</p>
10	<p>I am writing in response to the consultation for the new transport policy. Please can the following be shared and the email acknowledged as received.</p> <p><u>Section 6 - Journey Times</u></p> <p>The journey time guidance does not follow the statutory guidance. The Calderdale guidance has added an exception for breaching journey time as:</p> <p><i>Section 6.1 - d. "Multiple children may travel on the same vehicle."</i></p> <p>Not only is this not in the statutory guidance (see page 31, para 98) it is not a valid reason for longer journey times. When multiple children need to be collected, which is the most common way children get to the LA special schools, there needs to be enough transport provided to ensure journey times adhere to the guidance times.</p> <p>The Calderdale guidance has also added the following at the end of paragraph 6.2</p>	<p>Thank you for your email.</p> <p>I will ensure that this is included within the Consultation report.</p> <p>In the statutory guidance, the journey times are a general guide of 45 mins for a primary aged child and 75 minutes for a secondary aged child. Para 96 (Page 30) of the statutory guidance also states there will be circumstances where this is not possible for example in rural areas where children live in remote locations, where a child needs to travel a long way to the school named in the EHC plan or journey times extended by traffic delays.</p> <p>Para 97 of the statutory guidance goes on to say 'Shorter journeys may be desirable, perhaps because of a child's special educational needs or disability mean they become distressed while travelling, but a child</p>

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	<p><i>“Or agreeing a suitable, enroute, pick up and drop off point with parent to minimise the journey time.”</i></p> <p>Again, not only is this not included in the statutory guidance but it is the LA’s statutory duty to transport the child and minimise the journey time not the parents, even enroute.</p>	<p>may need to travel a long way to the school that is able to meet their needs and one vehicle may need to collect several children.’</p> <p>If a child became distressed while travelling, then alternative arrangements will be agreed with parent/carer.</p> <p>Arranging a suitable pick up/drop off point with parent/carers can be a solution that works well in some circumstances. It may be the home address is difficult for a vehicle to access or an agreed measure to reduce the time spent on the vehicle.</p> <p>Any pick up/drop off arrangement made will be mutually agreeable between parent/carer and the Council. If it is not agreed by either party, alternative arrangements will be sought.</p>
11	<p>I am writing to comment on the proposed changes to Calderdale's Home to School Transport policy. I am a parent of two primary-aged children with an EHCP in Calderdale. One receives transport to a specialist school, the other attends a local mainstream school and does not. There are two specific points I wish to object to in the strongest possible terms, 6.1 and 6.2.</p> <p>6.1 - the policy refers to the statutory guidance from DfE which states that for primary aged children journey times should not exceed 45 minutes each way. At 6.2 it states that a shorter journey may be desirable, but not always possible.</p>	<p>Thank you for your email.</p> <p>I will ensure your comments are included within the Consultation report.</p> <p>Para 96 (Page 30) of the statutory guidance states there will be circumstances where the maximum journey times is not possible for example in rural areas where children live in remote locations, where a child needs to travel a long way to the school named in the EHC plan or journey times extended by traffic delays.</p>

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	<p>I would say that for a primary aged child with complex SEN a reasonable journey time to school (and certainly not exceeding 45 minutes) is not desirable, it is a necessity. Please remember these children can be travelling on minibuses with escorts who are initially strangers from the age of 4. Some of the children are non-speaking; in wheelchairs; have continence issues; or medical issues as a few examples. It is unfair on these children and on the escorts who take responsibility for their care by expecting them to sit on a bus for long periods. Expecting children to do this increases the likelihood of challenging behaviour which might lead to them being excluded from transport assistance, a neat solution for the local authority to save money but potentially devastating for families. From a parent perspective, many of us work and have children at other schools. Whilst the local authority may be disinterested in the juggle of being an SEN parent, I am going to point a few things out. The proposal at 6.2 that a parent may be asked to meet the bus en route to minimise journey times is completely unworkable. Is the authority seriously suggesting a parent should go and wait in a layby on the A629 to meet their child's bus? What if the parent was unable to travel? What if the parent was late? What if the bus were rerouted, how would that change be communicated? It is impractical and actually cruel to ask parents who are already under severe stress to do this.</p> <p>I would be grateful if you could take these comments into account, and do not continue to seek underhand 'workarounds' to the statutory journey time limits. These are children, and the limits are there for a reason. In addition, I urge the Transport planners to work more closely with the SEN team to understand the complex needs of children with SEN and how they may be affected by inappropriate arrangements.</p>	<p>Para 97 of the statutory guidance goes on to say 'Shorter journeys may be desirable, perhaps because of a child's special educational needs or disability mean they become distressed while travelling, but a child may need to travel a long way to the school that is able to meet their needs and one vehicle may need to collect several children.'</p> <p>If a child became distressed while travelling, then alternative arrangements will be agreed with parent/carer.</p> <p>Arranging a suitable pick up/drop off point with parent/carers can be a solution that works well in some circumstances. It may be the home address is difficult for a vehicle to access or an agreed measure to reduce the time spent on the vehicle.</p> <p>Any pick up/drop off arrangement made will be mutually agreeable between parent/carer and the Council. If it is not agreed by either party, alternative arrangements will be sought.</p>
12a	<p>I wish to comment on the proposed changes to the home to school transport policy but I find this difficult as the following link in the existing policy:</p>	<p>I'm sorry you have had difficulties accessing the document. I have just done so and I can't identify what the problem may have been. In the meantime, please try this link:</p>

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	<p>https://www.calderdale.gov.uk/v2/residents/education-and-learning/schools/home-school-transport/policy#transport%20assistance doesn't work thus making it impossible to see what changes, if any, are being made.</p> <p>Can I suggest that you:</p> <ol style="list-style-type: none"> Correct this and; Produce a consultation document that highlights changes to the original so that people like me don't have to go through both documents word by word to see if there is a significant impact to them or their loved ones. 	<p><u>Home to School Transport Policy</u> (calderdale.gov.uk)</p> <p>Unfortunately it is not feasible at this time to produce a document to identify the changes from the existing to proposed policy. It is a complete rewrite and changes would therefore not be easily identifiable. However, there has been no change in legislation, so in terms of eligibility, there are no changes to Calderdale policy.</p> <p>Over a number of years, the DfE has been working on updating it's statutory guidance, to ensure that it is clearer for all parties to understand. It has provided more clarity and supplied examples which should help parents/carers. As a result of the guidance being released, Calderdale has taken the opportunity to update it's own policy, which has been in effect for almost 10 years, without any update (hence the rewrite).</p> <p>I hope this clarifies the situation.</p>
12b	<p>The link I am having a problem with is not the new consultation document but, as I said in my email, a link in the current policy document. Specifically the link in section 4 of this document: home to school transport policy (calderdale.gov.uk) which I have tried to access from 3 different browsers without success.</p> <p>Can I ask, if there are no changes to legislation what changes could there be that require a new policy?</p> <p>Surely if eligibility remains the same the policy remains the same and a rewrite just tries to make things clearer without changing the policy?</p>	<p>I have attached a PDF version of the current policy for your perusal.</p> <p>There will be some links within the current document that no longer work as the policy has not been updated for 10 years and web pages will have been updated.</p> <p>For example on the first page, there is reference to the Access and School Planning Team which was disbanded many years ago.</p>

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	Does that require a public consultation rather than just the approval of the relevant committee?	Following the DfE introducing the new guidance in June 2023, they recommended that authorities update their policies. If there is anything specific within the proposed policy that you would like to provide feedback on, please send in and I will ensure that this is included in the Cabinet Report.
13	I think it reads really well. Very clear and easy to understand with clear examples. The only thing I thought was that the max travel journey times seemed high. But maybe that's what they were before?	Thank you for this. Much appreciated.
14	I have read it all, and thought it was a really good read. The examples were good, and I learned a lot from it.	
15	When I had issues with J on school transport I battled for months asking transport for help and got nothing. He was not managing in the bus and it became dangerous for him the child and staff on the bus. I removed him and transported him myself as my expense for an extended period of time at no point in any of the communication with Transport or school did anyone tell me that I could apply the PTB. I accidentally found out through another parent. I repeatedly asked transport for a solution. It wasn't until I put in an official complaint that they then said I could get a personal budget. They need to be more upfront and giving with information when the system doesn't work for some children so parents have an informed choice. I felt they hid this from me on purpose knowing I was covering the cost but it actually affected us financially.	
16	Relating to the wording in Section 21.1 ' <i>Calderdale Council acknowledges that Children Looked After (CLA) are amongst the most vulnerable and disadvantaged groups. Calderdale Council is fully committed to its role as Corporate Parent</i> '.	Thanks x – I'll ensure these are included in the report.

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	<p>This is a really good statement to our commitment as corporate parents and grandparents</p> <p>Relating to the wording in Section 21.4, suggest the following is added: <i>‘Transport awards may also be considered for those children who have moved to a placement too far to travel independently to their home school, where it has been identified that it is in the child’s best interests that they need to continue to attending their home school’</i></p>	
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