

The Welsh Government is reviewing the Learner Travel (Wales) Measure 2008 to ensure it continues to be fit for purpose. Correspondence from members of the public and engagement with stakeholders (including the Children’s’ Commissioner, the Welsh Language Commissioner and the Future Generations Commissioner) have highlighted a number of issues with how the Measure currently enables home to school travel across Wales. These are:

- Concerns regarding child welfare relating to the 2 and 3 mile eligibility thresholds.
- The lack of direct Transport for Post 16 learners;
- The socio-economic impact of learners having to pay for their transport which was linked to the distance policy contained within the current Measure
- The consideration of travel to Faith schools
- Ensuring home to school transport provision meets the requirements of learners with Additional Learning Needs.
- Issues with travel to Welsh medium schools for all ages within the Measure.

In addition to reviewing these issues, due to the success of our [support for parents returning to work](#), learners about to enter statutory education will also fall within the scope of the review.

We are writing to you to gather your views and any data you hold in relation to the options for changes under consideration in the review of the Learner Travel (Wales) 2008 Measure. Your responses will be instrumental in informing the outcome of this review. Possible changes to the Measure may include:

- A. Mandating provision of free school transport for learners aged between 16 and 19
- B. Reducing the mileage thresholds for some or all learners
- C. Redefining nearest school to include nearest Welsh-medium school
- D. Redefining nearest school to include nearest faith school.
- E. Changes to National Guidance to introduce consistency of delivery across Local Authorities
- F. Requiring provision of school transport for pre-school-age learners

### Questions for Local Authorities

#### Questions relating to costs and practical feasibility of potential changes A, B and F

1. Assuming that all age groups are eligible for free travel, what would be the **predicted** numbers of learners which would be eligible for free school transport under the following potential changes to the mileage threshold? Assume no other changes to the measure.

- Nursery (eligible from 4 years)

Year	2 mile	1.5 mile	1 mile
2020 – 2021	47	114	497
2021 - 2022	47	114	497
2022 – 2023	47	114	497

- Primary School

Year	2 mile	1.5 mile	1 mile
2020 – 2021	349	815	3178
2021 - 2022	335	822	3214
2022 – 2023	291	698	2766

- Secondary School (eligible from 11 – 16)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	1467	337	359	868
2021 - 2022	1341	352	407	1166
2022 – 2023	1172	321	465	1430

- Secondary School (eligible from 16 – 19)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	NA	NA	NA	NA
2021 - 2022	NA	NA	NA	NA
2022 – 2023	NA	NA	NA	NA

- Further Education settings (eligible from 16 – 19)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	800	800	870	940
2021 - 2022	800	800	870	940
2022 – 2023	800	800	870	940

**\*NB: This is difficult to ascertain as Coleg Gwent who provide Post 16 education within Blaenau Gwent do not have the software capabilities to undertake the required level of analysis. Learners choose their preferred campus based on courses as opposed to distance.**

2. What would be the likely **additional** costs, excluding costs associated with free travel which is already provided, associated with mandating free travel for learners in the 16-19 age group in your LA area in the following categories:

Answer:

If the pass is being issued to a Blaenau Gwent (BG) learner the split is:  
Per term - £50 LEA; £30 College; £10 Learner – contribution passed to Stagecoach is £90, shortfall to £196.86 made up via the £1 per journey income

If the BG learner qualifies for additional financial support via the college Financial Contingency Fund, the split is:  
Per term: £50 LEA; £30 College; £10 Learner; £106.86 FCF fund – learner travels free on the bus. Anticipated additional costs = **£460k**

- Secondary school (16-19 only)
  - Further education settings
3. What would be the likely practical feasibility (including driver, operator and vehicle availability and availability of parking at school etc.) of delivering free travel for learners in the 16-19 age group?

Answer:

Given the scale and scope (geographical spread) of the required transport service, along with the differential in course start and finish times, the number of operators which could deliver this service is likely to be restricted. Therefore, it is highly likely that the provision would be accommodated by public transport providers. In addition, the number of students with special and specific needs/requirements vary significantly year on year, and may require bespoke arrangements i.e. wheelchair accessible transport, which is in short supply.

4. What would be the likely **additional** costs associated with mandating free travel to nurseries for learners aged 4 and above.

Answer:

At present we provide free home to school transport for nursery age pupils to access Welsh-medium education. Presently, there is no demand for nursery transport within the English-medium and faith schools at present. However, the broad cost estimate based upon the (497) figure detailed above would be: £500,000. It is important to note that these figures are likely to fluctuate in line with in-year transfer requests and delayed/late nursery applications.

5. What would be the likely practical feasibility (including driver, operator and vehicle availability and availability of parking at school etc) of delivering free travel to nurseries for learners aged 4 and above.

Answer:

The number of home to school transport providers within the local and surrounding areas is very limited, as evidenced by recent tendering exercises. This provision would require either larger vehicles and/or additional vehicles. Consideration would also need to be given to the suitability of transport and age groups accessing provision alongside nursery-aged pupils. The availability of vehicles would be further restricted due to the requirement for lap belts to accommodate those pupils aged 4 years. It is highly unlikely that the authority would be able to procure the required number of vehicles to facilitate this provision.

6. What would be the likely **additional** costs, excluding costs associated with free travel for learners within the 2 and 3 mile thresholds which is already provided, of reducing the mileage thresholds for the below age groups in line with the below scenarios:

- Nursery (eligible from 4 years of age)

Year	1.5 mile	1 mile
2020 – 2021	£400,000	£700,000
2021 - 2022	£400,000	£700,000
2022 – 2023	£400,000	£700,000

- Primary School

Year	1.5 mile	1 mile
2020 – 2021	£1,400,000	£1,400,000
2021 - 2022	£1,400,000	£1,400,000
2022 – 2023	£1,400,000	£1,400,000

- Secondary School (eligible from 11 – 16)

Year	2 mile	1.5 mile	1 mile
2020 – 2021	£900,000	£1,500,000	£2,000,000
2021 - 2022	£900,000	£1,500,000	£2,000,000
2022 – 2023	£900,000	£1,500,000	£2,000,000

- Secondary School (eligible from 16 – 19)

Year	2 mile	1.5 mile	1 mile
2020 – 2021	N/A	N/A	N/A
2021 - 2022	N/A	N/A	N/A
2022 – 2023	N/A	N/A	N/A

- Further Education settings (eligible from 16 – 19)

Year	2 mile	1.5 mile	1 mile
2020 – 2021	£500,000	£560,000	£610,000
2021 - 2022	£500,000	£560,000	£610,000
2022 – 2023	£500,000	£560,000	£610,000

**\*NB: Learners choose their preferred campus based on courses as opposed to distance.**

7. What would be the likely practical feasibility (including driver, operator and

Answer:

Nursery/Primary:

The number of home to school transport providers within the local and surrounding areas is very limited, as evidenced by recent tendering exercises. This provision would require either larger vehicles and/or additional vehicles. Consideration would also need to be given to the suitability of transport and age groups accessing provision alongside nursery-aged pupils. The availability of vehicles would be further restricted due to the requirement for lap belts to accommodate those pupils aged 4 years. It is highly unlikely that the authority would be able to procure the required number of vehicles to facilitate this provision.

Secondary:

The number of home to school transport providers within the local and surrounding areas is very limited, as evidenced by recent tendering exercises. This provision would require either larger vehicles and/or additional vehicles. Consideration would also need to be given to the suitability of transport in line with the learners needs.

Post 16:

Given the scale and scope (geographical spread) of the required transport service, along with the differential in course start and finish times, the number of operators which could deliver this service is likely to be restricted. Therefore, it is highly likely that the provision would be accommodated by public transport providers. In addition, the number of students with special and specific needs/requirements vary significantly year on year, and may require bespoke arrangements i.e. wheelchair accessible transport, which is in short supply.

\*Increased competition between neighboring authorities is likely to further reduce the pool of operators on which the LA's are able to draw. It could also impact upon the cost of the provision in line with the competitive tendering process.

vehicle availability and availability of parking at school etc) of reducing the mileage thresholds in line with each of scenarios above (e.g. reducing to 2, 1.5 or 1 mile for 11-19 and reducing to 1.5 or 1 mile for nursery and primary)?

Questions relating to travel for learners in the 16-19 age group

8. What are your Authority's current arrangements for providing transport for learners in 16-19 age group? For example, is free travel provided or is there a cost levied per term or academic year per learner?

Answer:

If the pass is being issued to a forward Blaenau Gwent (BG) learner the split is:

Per term - £50 LEA; £30 College; £10 Learner – contribution passed to Stagecoach is £90, shortfall to £196.86 made up via the £1 per journey income

If the BG learner qualifies for additional financial support via the college Financial Contingency Fund, the split is:

Per-term: £50 LEA; £30 College; £10 Learner; £106.86 FCF fund – learner travels free on the bus.

9. If learners are expected to contribute towards the cost, what is the annual cost for each learner?

Answer:

Annual cost per learner is £30 + £1 each way if they are NOT eligible for FCF support (Financial Contingency Fund). If they are eligible they pay only the £30.

10. What is the attendance rate (as a percentage of eligible learners) at further education for learners in the 16-19 age bracket in your LA area?

Answer:

We are presently awaiting this information from Coleg Gwent and Torfaen CBC for WM 16-19 provision.

11. Do you hold information on the impact of your 16-19 learner travel policy on education attendance for 16-19 year olds in your LA area?

Answer:

We are presently awaiting this information.

Questions relating to mileage thresholds

12. Do you provide any free travel for learners which live within the current 2 and 3 mile thresholds?

a. If so, on what basis (e.g. unsafe walking route, advanced learning needs, medical need, historic non statutory arrangements etc.) do you provide this travel and how is this assessed? **Please provide detail on assessment methodologies for each basis.**

b. Please provide a breakdown of numbers of learners for whom travel within the mileage thresholds is provided against the reason for providing travel as per tables below:

- Primary school

Basis for free travel within 2 mile threshold	Numbers of learners for whom free travel is provided within current mileage threshold
ALN	63
Unsafe walking route	70

- Secondary school (11-16)

Basis for free travel within 3 mile threshold	Numbers of learners for whom free travel is provided within current mileage threshold
ALN	44

- Secondary school (16-19)

Basis for free travel within 3 mile threshold	Numbers of learners for whom free travel is provided within current mileage threshold
N/A	N/A

- Further education (16-19)

Basis for free travel within 3 mile threshold	Numbers of learners for whom free travel is provided within current mileage threshold
ALN	18

- c. What is the current cost of providing free travel for learners within the current 2 and 3 mile thresholds?

Answer: £150,000 for primary and £120,000 for secondary

- d. In your view, are there any instances where you believe that travel should be provided but where the authority is unable to provide this? If so, why is this?

Answer: No

- e. Do you have an appeals process following results of assessment to determine whether or not free travel is provided within the current mileage thresholds? (E.g. appeals process following risk assessment for an unsafe route). **Where an appeals process exists, please provide a description of this process**

Answer:

Yes, the process is detailed within the LA policy which can be found via the following link: [https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Schools\\_and\\_Learning/Admissions\\_20\\_21/HTSPSTP\\_FV\\_Eng.pdf](https://www.blaenau-gwent.gov.uk/fileadmin/documents/Resident/Schools_and_Learning/Admissions_20_21/HTSPSTP_FV_Eng.pdf)

- f. Can you provide any data on the number of successful and unsuccessful appeals?

Answer:

1 appeal was submitted in the last academic session – the appeal was upheld in favor of the appellant.

- g. What are your criteria for 'home' designation?

Answer:

The child or young person's permanent address/place of residence associated with the parent/parents with responsibility. This must not be of a family member of another adult who looks after the child.



13. Do you hold data on the number of non-statutory learners using dedicated statutory service or local bus services on a concessionary basis? If possible, please provide a summary of this as an average % across all services in your authority's network.

Answer:  
N/A

14. Are there any privately operated contracts or commercial services operated in your area solely for the purpose of carrying non-statutory learners? If so, how many? And can you provide an estimate of the numbers of learners carried.

Answer:  
This information is not requested nor is it held by the LA.

#### Questions relating to travel to Faith schools

15. What are your Authority's current arrangements for providing transport to faith schools? For example is any free travel provided?

Answer:  
Transport is provided to all Faith Schools free of charge in line with the LA's current policy.

16. Assuming that the definition of 'nearest school' is amended to include the nearest relevant faith school, and assuming that all age groups are eligible, based on the below potential changes to the mileage thresholds what would be the **additional likely costs** of providing free travel to faith schools for learners living in your LA area. Please use current attendance at faith schools and student travel distances to develop these figures (i.e. we do not expect you to predict behavioural change as a result of changes to the measure).

- Primary School (eligible from 4 years of age)

Year	2 mile	1.5 mile	1 mile
2020 – 2021	£110,000	£140,000	£160,000

- Secondary School (eligible from 11 – 16)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	£120,000	£120,000	£120,000	£120,000

- Secondary School (eligible from 16 – 19)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	N/A	N/A	N/A	N/A

17. What would be the likely practical feasibility (including driver, operator and vehicle availability and availability of parking at school etc) of providing free travel to faith schools in line with each of the mileage thresholds given above?

Answer:

The number of home to school transport providers within the local and surrounding areas is very limited, as evidenced by recent tendering exercises. This provision would require either larger vehicles and/or additional vehicles. Consideration would also need to be given to the suitability of transport in line with the learners needs.

18. Do you hold any data on the number of learners that were unable to attend a faith school due to issues with transport? Please provide examples.

Answer:

N/A

19. In your view, what changes to the measure might better facilitate access to faith schools?

Answer:

N/A – we currently facilitate access to faith education based upon preference in line with the specified mileage criteria.

20. In your view, how will the potential changes outlined at the very start of the questionnaire (points A-F) impact access to faith school education (positive or negative)?

Answer:

No impact, as our policy currently provides the required access as specified above.

Questions relating to travel to Welsh medium schools

21. What are you Authority's current arrangements for providing transport to Welsh-medium schools? For example is any free travel provided?

Answer:

Transport is provided to all Welsh-medium free of charge in line with the LA's current policy.

22. How do you define Welsh-medium school in your LA area?

Answer:

A school which educates solely via the medium of Welsh.

23. Assuming that definition of 'nearest school' is amended to include the nearest relevant Welsh medium school, based on the following scenarios and mileage thresholds, what would be the **additional costs** of providing free travel to Welsh medium schools for learners living in your LA area. Please use current attendance at Welsh medium schools and student travel distances to develop

these figures (i.e. we do not expect you to predict behavioural change as a result of changes to the measure).

- Primary School (eligible from 4 years of age)

Year	2 mile	1.5 mile	1 mile
2020 – 2021	N/A	N/A	£290,000

- Secondary School (eligible from 11 – 16)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	N/A	N/A	N/A	N/A

- Secondary School (eligible from 16 – 19)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	N/A	N/A	N/A	N/A

- Further Education settings (eligible from 16 – 19)

Year	3 mile	2 mile	1.5 mile	1 mile
2020 – 2021	N/A	N/A	N/A	N/A

24. What would be the likely practical feasibility (including driver, operator and vehicle availability and availability of parking at school etc) of providing free travel to Welsh medium schools in line with each of the mileage thresholds given above?

Answer:  
Currently, we only have one Welsh-medium Primary School which services the whole of Blaenau Gwent, with secondary pupils accessing places and transport to Ysgol Gyfun Gwynllyw – situated within Torfaen.

25. Do you hold any data on the number of learners that were unable to attend a Welsh-medium school due to issues with transport? Please provide examples.

Answer:  
N/A

26. How is transport provision being considered within your Authorities' Welsh in Education Strategic Plan?

Answer:

We view transport aligned to improved access on an annual basis, hence the decision to offer free nursery transport. In addition, all statutory proposals consider associated transport costs and requirements.

27. In your view, what changes to the measure might better facilitate access to Welsh medium education?

Answer:

Free nursery transport – which we already implement locally.

28. In your view, how will the other potential changes outlined at the very start of this questionnaire (points A-F) impact access to Welsh medium education (positive or negative)?

Answer:

Consistency in approach is vital to ensure that choice is based upon preference in line with equality of access, as opposed to be focused on transport and access only.

#### Questions relating to accessibility

29. What proportion of vehicles used for dedicated home to school transport comply with PSVAR 2000 regulations?

Answer:

The LA procures this provision in line with the pupil's needs. Therefore, all transport required to facilitate children and young people with specific needs are compliant.

#### Other additional questions

30. What would be the likely practical feasibility of implementing multiple changes outlined above (For example, reducing mileage thresholds **and** providing free travel to post 16 learners **and** providing free travel to welsh medium and faith schools).

Answer:

The number of home to school transport providers within the local and surrounding areas is very limited, as evidenced by recent tendering exercises. This provision would require either larger vehicles and/or additional vehicles. Consideration would also need to be given to the suitability of transport in line with the learners needs. Consistency in approach is required to ensure equality of access for all learners in line with their preference.

31. Do you utilise and integrate local bus services in your area when providing school transport? What do you perceive to be the opportunities, benefits, barriers or risks associated with this practice?

Answer:

The LA utilises local bus services as and when required in line with both suitability and availability. There are, however, issues associated with timing of the journey's and vehicle capacity.

32. How many FTE staff work on learner travel within your LA. What would be the implications of applying potential changes to the measure, outlined in the opening paragraphs of this questionnaire, on LA resource required to deliver learner travel?

Answer:

There is 1 one FTE and 1 part-time Officer who oversee planning and delivery aspects of home to school and post 16 transport provision. Along with 2 managers overseeing the delivery of this function in line with the policy and associated budget. There would be a requirement for additional staffing to assist the already stretched implementation team. The Council would need to appraise the situation should the changes be agreed, however, as a minimum requirement another FTE Officer would be required.

33. In your view, are there any issues that exist with the current Learner Travel Wales) Measure 2008 which require review?

Answer:

- Exploration and development of a dedicated appeals policy to ensure clarity and consistency in approach, whilst managing the expectations of parents.
- A review of the behavior code
- A more consistent approach and framework to support home to school and post 16 transport policy development throughout Wales
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34. Is there anything else that is relevant you would like to add or comment in relation to the Learner Travel (Wales) Measure or the review that is not already captured within your response to the questions asked?

Answer:

Many students reliant on public transport note that there are extremely limited direct transport links to college. As a result, students often have a longer commute with multiple changes. This can affect arrival times and departure should lessons etc. run over. The College runs courses into the evening and students often rely on service buses for their journeys. A more coordinated approach in relation to public transport bus and college timetables would be beneficial to students needing to use public transport to get to college.

Thank you for your time in completing this questionnaire. Information received will be collated and made available on the Welsh Government website as part of supporting information to inform any recommendations made to Ministers.