

# CHILDREN AND EDUCATION SCRUTINY SUB-COMMITTEE

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Wednesday, 26 February 2020 at 6.30 p.m.

C3 - Town Hall Mulberry Place

## SUPPLEMENTAL AGENDA

This meeting is open to the public to attend.

**Contact for further enquiries:**

Democratic Services

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For further information including the Membership of this body and public information, see the main agenda.

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# SEND Transport Update

26<sup>th</sup> February 2020

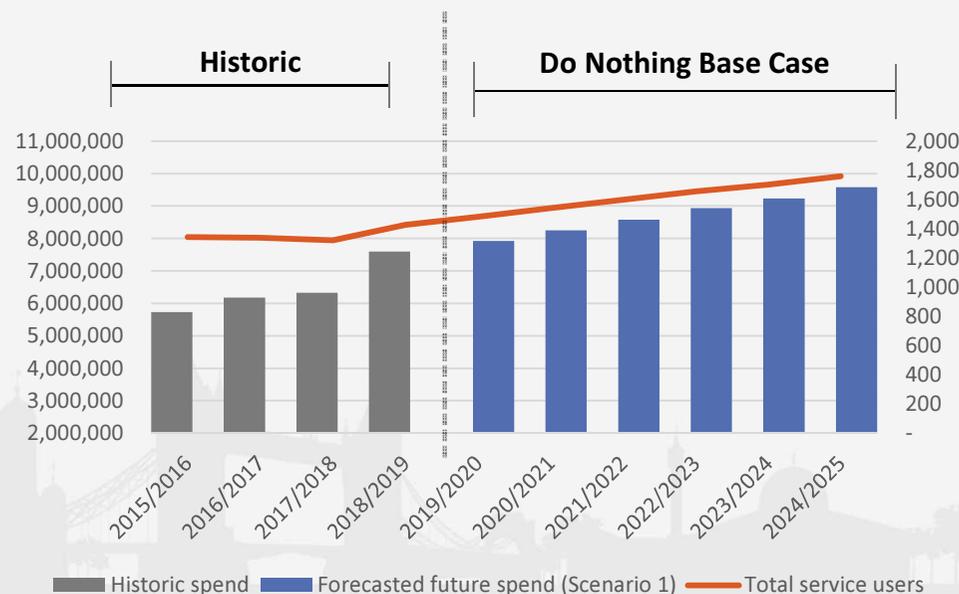


# CASE FOR CHANGE

## Special Education Needs (SEN)

- Greater independence for SEND children and young people who are able
- The council has a duty to provide transport for children 5- 16
- If young people transition to Adult Services the intention is to continue to steadily decrease demand over time, in line with the current trajectory

- The council currently spend £7.9m on SEND and Social Care Transport; £5.6m on children and young people
- This could increase by a further £1.7m if the council take no remedial action
- A challenge to deliver significant savings across the current MTFS period



## Council Commissioned a review Scope of the review

- Outlining options for changes to current delivery models
- Mapping the councils spend across SEN and social care transport
- Inform future decisions around delivery as well as procurement of replacement fleet

# Draft revision to the council’s travel assistance policy



SUBJECT AREA	CURRENT POLICY	REVISED POLICY
<b>Eligible children</b>	Interpretation of eligibility too broad (e.g. all children with a statement of special educational needs (SEN) and/ or disability, or mobility problems).	Updated to reflect latest DfE guidance, focusing those who cannot be reasonably be expected to walk to school because of their mobility problems or because of associated health and safety issues related to their SEND. There will be no change for children with complex needs.
<b>Discretionary power</b>	Does not limit the transport that will be provided to children not eligible for home to school travel assistance.	Under their Discretionary powers, the council may provide support for those aged 4 and under, but the support will be limited to payment of a Personal Travel Budget only.
<b>Assessment</b>	Does not articulate how children will be assessed.	Incorporates suggested questions outlined in the assessment stage of the referral pathway.
<b>The ways home to school travel will be provided</b>	-	The updated travel assistance policy makes no changes to the ways in which the council provides travel assistance.

# CASE STUDY



**Name** Alias  
**Age** 15  
**Gender** Female

**SEN Category** Global Development Delay  
**Referrer** Key SEN teacher  
**Initially referred** 2011  
**Assessment** 2012, 2013, 2014  
**Re-referral** 2015

## Where the referral came

- We received the referral from the Key SEN teacher at the pupil's school. She felt MU would benefit from ITT.

## How the initial contact with parents went

- The parents had been made aware of the referral prior to our home visit and were keen for her to try the training. We talked about how the training would work and what we would be teaching her, including personal safety; road safety; managing money; recognising landmarks and what to do if things go wrong.

## Outcomes/what the service user learnt

- The student received 13 sessions with one of our accredited travel trainers. During these sessions, she learnt to navigate controlled and uncontrolled crossings safely and demonstrated this on several occasions when she was observed by the trainer. The training was going well; however she was easily distracted on the bus and would frequently miss her bus stop. She was not able to concentrate for the entire journey and it was not safe to move the training on, allowing her to complete part of the journey independently. The decision was made to stop the training.
- In line with the children's travel assistance, she was then assessed annually in 2012 and 2013, where it was felt she still hadn't gained the necessary skills to travel independently.
- She then moved over to adults and in line with their Travel Assistance Policy, she was also assessed then. With maturity and as MA had developed further skills it was felt that she should be given the opportunity to try ITT again.
- The training started and she received 34 sessions. She already had the road safety skills she had learnt before and was able to focus more whilst travelling on the bus, and eventually was able to travel independently to and from College.
- She has since started work experience at a Day Centre and continues to travel independently.
- We accept re-referrals and if she needs to learn a new route, we will happily teach her how to travel safely on the new route.

# A focus on independence and travel training



## **Independent travel training focussing on:**

- Increased confidence and independence
- Decreased reliance on specialist transport and parents/carers
- Improved contribution at school
- More opportunities to go out with friends and join clubs
- More opportunities to go to college or find a job

## **How does it work:**

- Learning the journey and foundation travel skills
- Personal safety and problem solving
- Journey practice and learning alternative routes
- Building confidence and becoming independent

# A focus on independence and travel training



## Comments on how ITT supports independence

‘Before travel training, I went to school in a taxi so I couldn’t do clubs after school. Now I’m more independent – I can go out where and when I want to. I feel positive, I concentrate more, and I feel focussed.

‘Now, I go to a drama club on Saturdays and then catch the bus to meet my mum at church. I go with one of my friends to church youth club. I’m learning to play guitar and I sing with the group.

‘In the future I want to live on my own in an apartment and learn to drive. I will have to pay bills. I need to work for money so that I can have a family, and then we can go on holidays to many places that I’ve never been to.

If I hadn’t done travel training, I couldn’t go to the clubs after college, or to any other places. I would be at home.’ Child D parent has also seen the impact, saying: ‘I was worried about the training, I worried he would get hurt. So I kept him close for protection. When the travel training coordinator came to my house and I met the travel trainers I felt very reassured, they kept me up to date with his progress, I was happy with the work.

‘To other parents I would say that I was reassured by the information from the travel training team, and I would recommend it to other people. Rene is so confident, and he can do so many different things. It’s been very good for him.’

# ASSESSMENT AND REFERRAL PATHWAY



A review of the current referral and assessment pathway for SEND transport has also found that it could be improved and better support the revised travel assistance policy by adding additional elements.

These include incorporating specific processes for:

- Tighter eligibility questions
- Focus on independence throughout
- Regular annual reviews
- Quality assurance checks for all successful applications for home to school transport; and,
- Director approval for all discretionary travel arrangements (those not eligible for)

# ASSESSMENT AND REFERRAL PATHWAY



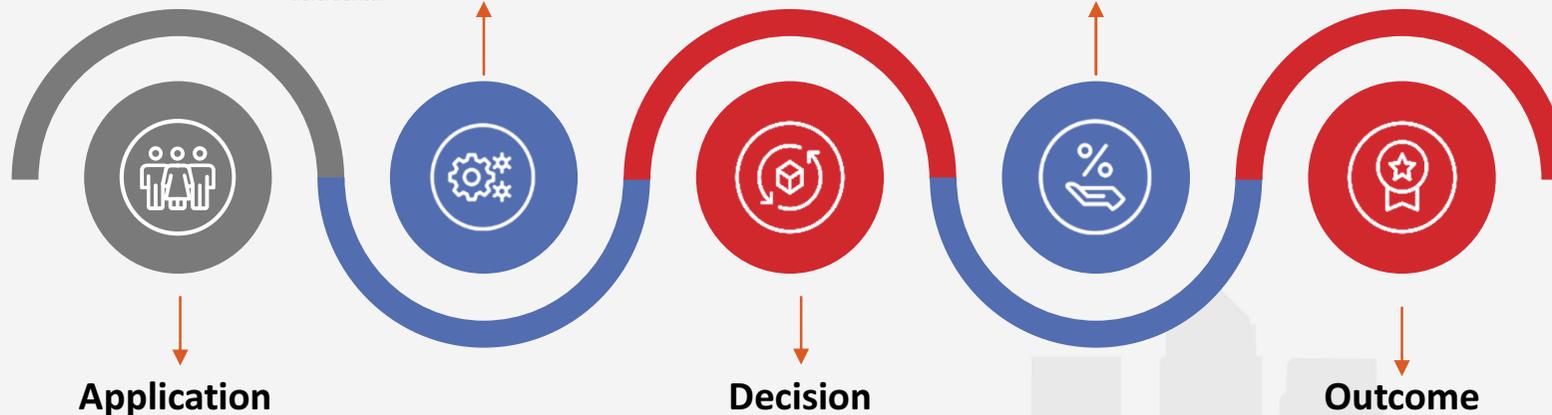
Children’s (ii) – End to End process – Annual assessments will support better demand management and policy adherence

## Assessment

- Would the child have difficulty in walking or using public transport due to their special educational needs or disability?
- Does the child’s special educational need or disability rule out the use of free public transport, or is suitable public transport is not conveniently available?
- Does the child have emotional/behavioural difficulties that severely affect their ability to use free public transport or would the child be vulnerable and at risk of danger to themselves, or the general public, if they use public or other transport?
- Would the child be able to travel independently to school if suitably travel trained?

## Quality assurance

- Decisions are reviewed by transport panel – discussion should scrutinise:
  - Evidence captured in the application and assessment process;
  - The opportunity to utilise independent travel training; and,
  - The suggest form of travel assistance;



### Application

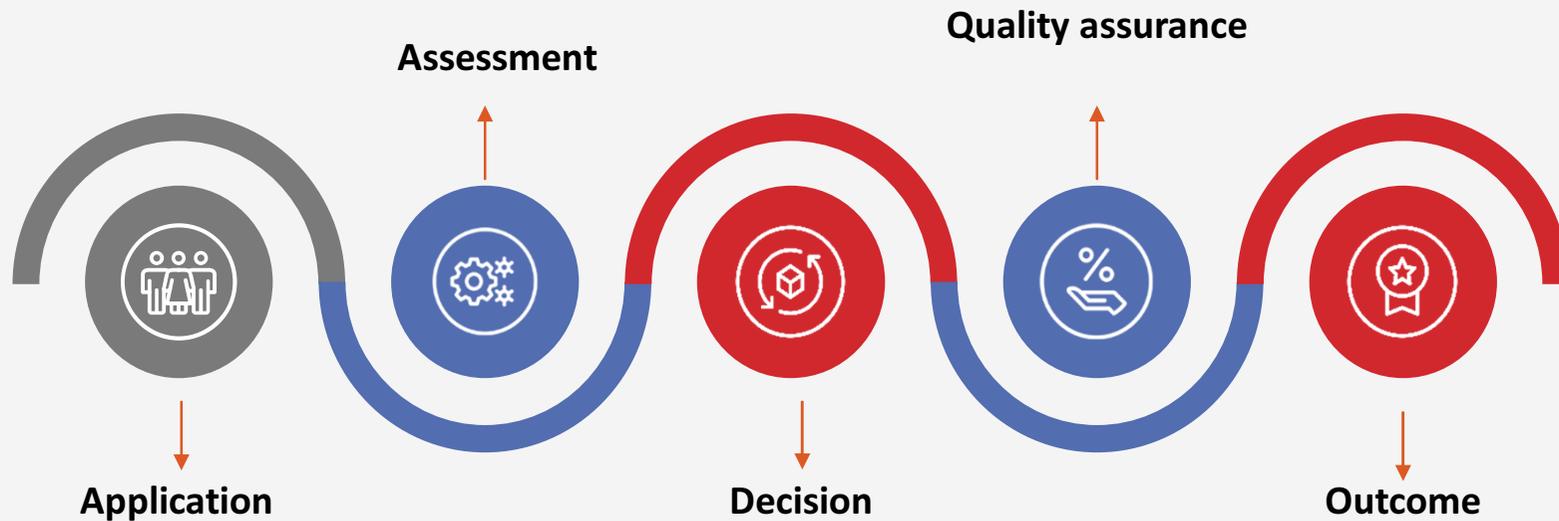
- Is the child eligible?
- statutory walking distances;
  - **special educational needs, disability or mobility problems;**
  - Unsafe walking route; and
  - extended rights

### Decision

- Council officers check applications in accordance with the eligibility criteria and assessment questions, a recommendation is made regarding whether the council should provide travel assistance and what is the most appropriate from of support.

### Outcome

# ASSESSMENT AND REFERRAL PATHWAY



Is the child eligible?

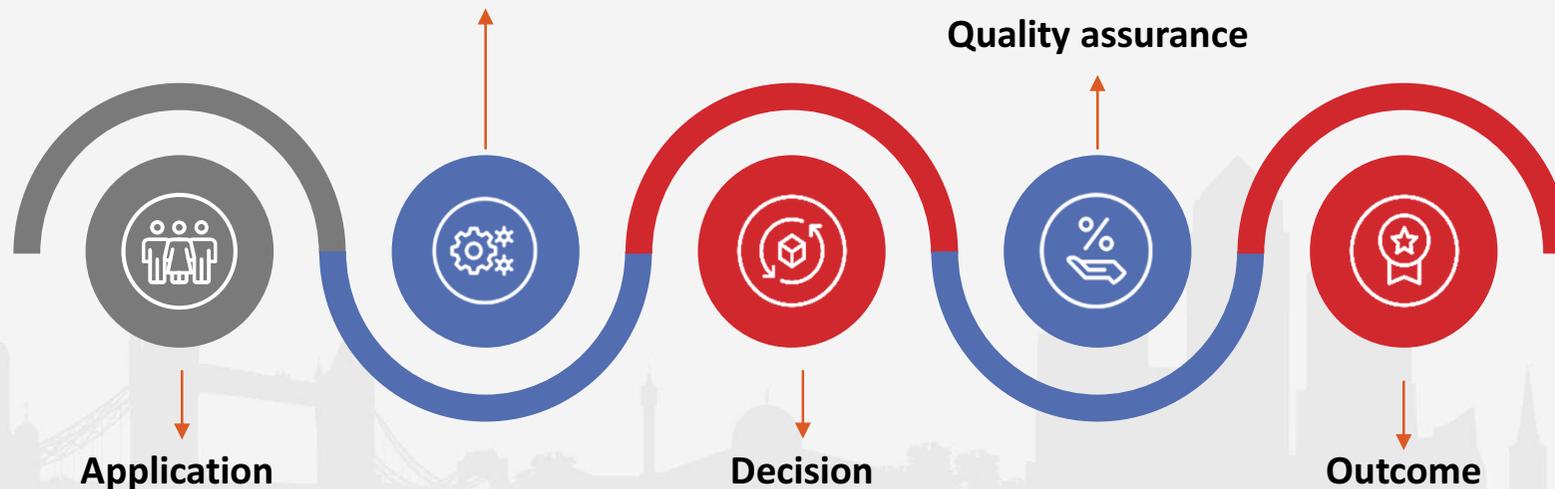
- statutory walking distances;
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- extended rights

# ASSESSMENT AND REFERRAL PATHWAY

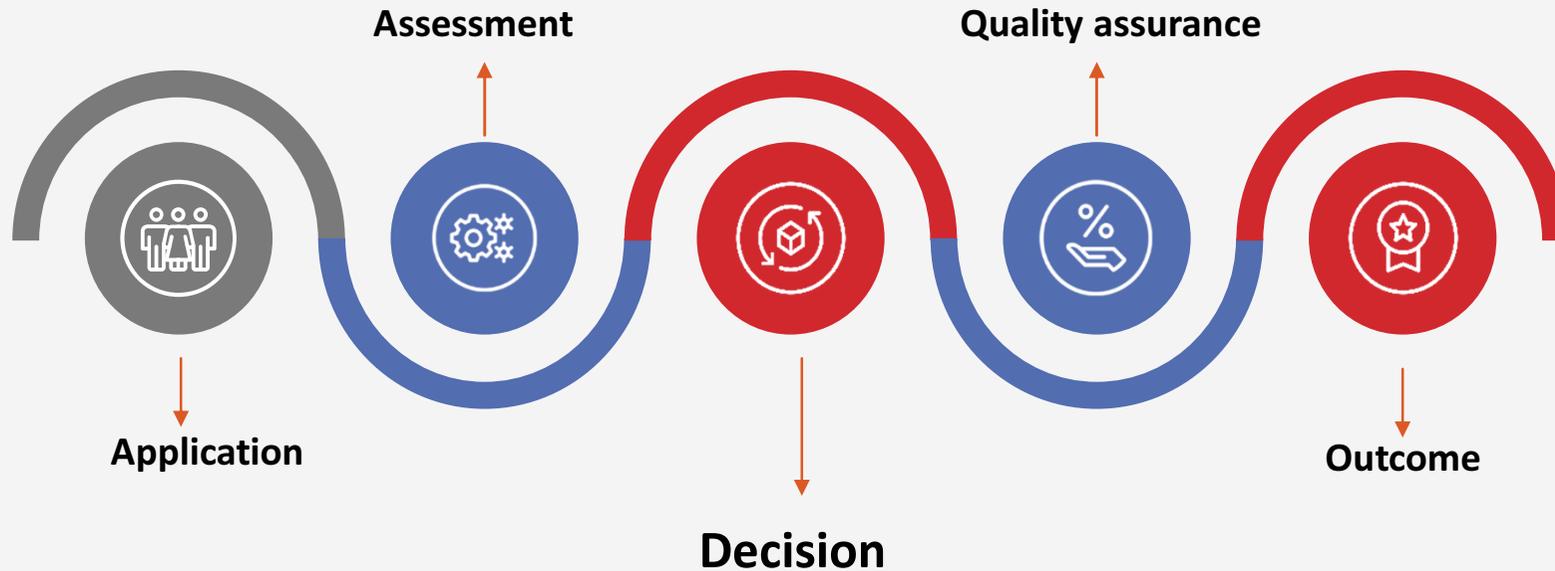


## Assessment

- Would the child have difficulty in walking or using public transport due to their special educational needs or disability?
- Does the child's special educational need or disability rule out the use of free public transport, or is suitable public transport is not conveniently available?
- Does the child have emotional/behavioural difficulties that severely affect their ability to use free public transport or would the child be vulnerable and at risk of danger to themselves, or the general public, if they use public or other transport?
- Would the child be able to travel independently to school if suitably travel trained?



# ASSESSMENT AND REFERRAL PATHWAY



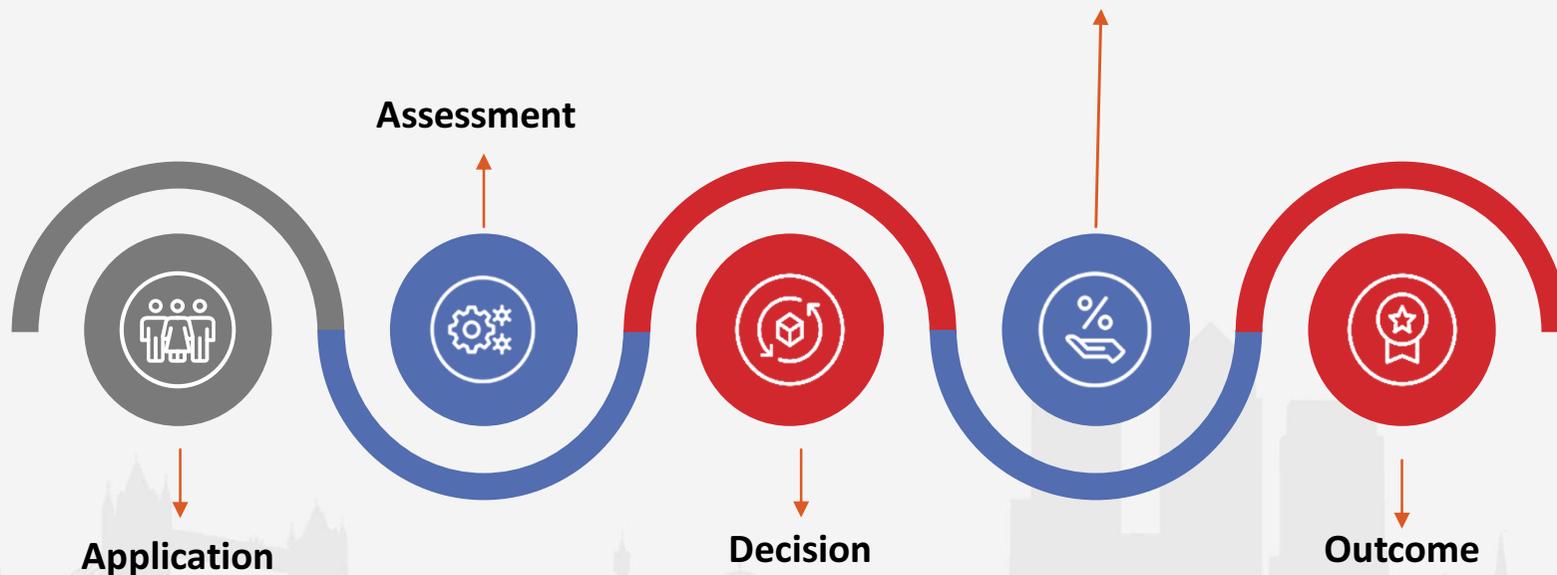
- Council officers check applications in accordance with the eligibility criteria and assessment questions, a recommendation is made regarding whether the council should provide travel assistance and what is the most appropriate form of support.

# ASSESSMENT AND REFERRAL PATHWAY



## Quality assurance

- Decisions are reviewed by transport panel – discussion should scrutinise:
  - Evidence captured in the application and assessment process;
  - The opportunity to utilise independent travel training; and,
  - The suggest form of travel assistance



<p style="text-align: center;"><b>Mayor's Advisory Board</b></p> <p style="text-align: center;">4<sup>th</sup> December 2019</p>	
<p><b>Report of:</b></p> <ul style="list-style-type: none"> <li>• Sharon Godman, Divisional Director Strategy, Policy and Performance</li> <li>• Debbie Jones, Corporate Director, Children and Culture</li> <li>• Denise Radley, Corporate Director, Health, Adults &amp; Community</li> </ul>	<p><b>Classification:</b> Unrestricted</p>
<p style="text-align: center;"><b>Improving SEND and Social Care Transport</b></p>	

## Executive Summary

This report sets out our proposed approach to travel assistance for children with special educational needs and disabilities (SEND) and for adults with social care needs.

The Council's strategic plan outlines our commitment to transforming services to achieve better outcomes for residents, and our commitment to ensuring residents can live as independently as possible. Against a backdrop of restricted resources and rising demand, we have to look at new and innovative ways of protecting important services that support people now and in the future. This report and the attached Travel Assistance policy sets out a proposed approach in this context.

**Section 3** of the report describes the current situation in relation to travel assistance in Tower Hamlets: It sets out our statutory duties, the rising demand for travel assistance from children with SEND, and the associated rise in costs. It goes on to summarise the national picture – which mirrors our own – and articulates our existing strategic commitments around promoting independence.

**Section 4** of the report describes the findings of a strategic review of travel assistance. It sets out that an increase in demand and spend is projected if no action is taken. It describes the range of travel assistance options that already exist outside those offered through the Council's Transport Services Unit (e.g. personal travel budgets) and notes that these are not being fully utilised. It goes on to reiterate the four main options for SEND and adult social care transport that were discussed at the Mayor's Advisory Board in summer 2019:

- Option 1: Do nothing
- Option 2: Operational efficiencies (agreed and started)
- Option 3: Supportive policy improvements (proposed through this report and

Appendix I)

- Option 4: Restrictive policy and structural changes (not proposed – please see Section 2 for more detail).

**Section 5** of the report describes the proposed revised Travel Assistance policy and its intended impact. The revised policy:

- Continues to place emphasis on empowerment and promoting independence, strengthening and setting out in more detail how we will apply this in practice;
- Makes no significant changes to the approach or support provided by the council to adults with social care need<sup>1</sup>;
- Puts a renewed emphasis to offer, where appropriate, a broader range of travel assistance to children with SEND and their families, such as personal travel budgets and travel cards, and therefore a move away from a position whereby the council is providing either an internal service or a private hire vehicle by default; and,
- Alters the type of ‘discretionary’ travel assistance that will be provided by the council to children with SEND, restricting the use of the internal fleet and private hire vehicles commissioned exclusively to those who the council has a legal duty to provide transport assistance.

The section goes on to describe the intended impact of this approach coupled with the operational efficiencies being put into place. The anticipated impact includes:

- A continued decrease in demand for travel assistance in adults, and a dampening of the projected rising demand for travel assistance for children with SEND;
- Greater independence for children with SEND and adults with social care needs;
- A subsequent potential reduction of the council’s current expenditure on SEND and adult social care transport up to £1.4m, with opportunities for further reductions.

The report also recommends that public consultation on the revised Travel Assistance policy – targeted at children with SEND and their families and carers – be carried out between January and end of February 2020. The final policy and approach can then be returned to Cabinet in April

### **Recommendations:**

The Mayors Advisory Board is recommended to:

1. Note the contents of this report;
2. Agree the policy principles that form the basis of Option 3, articulated in the revised Travel Assistance Policy (Appendix I)

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<sup>1</sup> This is because the pressure in adult social care is being effectively addressed, whereby the focus on promoting independence and strengths-based practice has resulted in an increase in the number of adults travelling independently.

3. Note the Equalities Analysis (Appendix II)
4. Agree for consultation to be carried out in respect of the recommended approach. The consultation will be aimed at children with SEND and their families and carers between January and end of February 2020, given that no substantial changes are being proposed for adults with care needs (Appendix

## **1 REASONS FOR THE DECISIONS**

- 1.1 The proposed new approach is in accordance with our commitment, across all service areas, to ensuring that residents can live as independently as possible.
- 1.2 The proposed new approach is intended to address the projected rise in demand. If the council were to make no substantial improvements travel assistance costs are forecast to rise from £7.9m to £9.6m per annum by 2024/25 and service users are anticipated to grow by 215 in the same period.
- 1.3 In the absence of this focus within this service area, most children with SEND in receipt of travel assistance are placed on either a bus provided by the internal Transport Service Unit or on private hire vehicles organised through the Transport Services Unit. Both forms of support should traditionally be reserved for those with the highest level of need.

## **2 ALTERNATIVE OPTIONS**

- 2.1 Do nothing (*not recommended*).
- 2.2 Explore options to change the internal transport delivery model (*not recommended*). This option would have explored the possibility of outsourcing the internal delivery model to an external provider.
- 2.3 Consider an approach in line with option 4, whereby more restrictive policy and structural changes would be put in place (*for consideration*). This option represents the most radical approach. It would incorporate all the elements of options 2 and 3 but go further with a more restrictive policy position that could include stopping all discretionary services like direct transport provision; having more of a 'default' offer of personal travel budgets (used interchangeably with direct payments in this report) to those under school age and delivering school routes on a staggered roster.

This option could reduce spend by up to £3.7m. However, it is also likely to be the most disruptive to existing users and other service areas, such as schools' provision. This report proposes proceeding with Option 3 as this enables a personalised, tailored travel assistance to be provided to children with SEND and adults with care needs whilst also dampening demand. However, Options 3 and Options 4 are not mutually exclusive and may be better understood as a 'menu' of more detailed options that can be drawn from. So whilst this report focuses on Option 3, there may be aspects of Option 4 that may still warrant consideration.

### 3. BACKGROUND AND CONTEXT

#### 3.1 Eligibility and statutory duties related to travel assistance

- 3.1.1 The council has a legal duty to provide transport assistance to eligible children and young people. For adults, local authorities have a legal duty to ensure any eligible social care needs identified through a Care Act assessment are met, which for some individuals might relate to transport.
- 3.1.2 The council must provide such free home to school travel arrangements for school-age children<sup>2</sup> that we consider necessary to facilitate the attendance at school of eligible children resident in our area<sup>3</sup>. There are four categories under which children can be eligible:
- statutory walking distances;
  - special educational needs, disability or mobility problems;
  - Unsafe walking route; and.
  - extended rights
- 3.1.3 We have a discretionary power to provide home to school travel for children resident in the area who are not eligible children. We may, for example, use this discretionary power to:
- provide free home to school travel to children who are not eligible children
  - provide home to school travel for children who are not eligible children for which parents are charged a reduced rate.
- 3.1.4 There is no legal requirement for local authorities to provide travel assistance beyond the completion of Year 11, however, we have a duty to prepare and publish an annual transport policy statement specifying the arrangements for the provision of transport, or otherwise that the authority considers necessary, to make to facilitate the attendance of all persons of sixth form age receiving education or training.
- 3.1.5 Without exception, parents and carers have a (legal) responsibility to ensure that their child/ children attend school regularly, regardless of the child's special educational needs or disabilities.
- 3.1.6 For adults, councils have a legal duty to ensure that social care needs that meet the 2014 Care Act eligibility threshold are met. Care Act statutory guidance includes the following:
- *“6.100 The national eligibility criteria set a minimum threshold for adult care and support needs and carer support needs which local*

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<sup>2</sup> A child reaches compulsory school age on the prescribed day following their fifth birthday or on their fifth birthday if it falls on a prescribed day. The prescribed days are 31 December, 31 March and 31 August. A child ceases to be of compulsory school age on the last Friday in June in the school year in which a child reaches age 16.

<sup>3</sup> [Statutory guidance for local authorities: Home to school travel and transport for children of compulsory school age](#)

authorities must meet. All local authorities must comply with this national threshold’.

- ‘6.106 Local authorities should consider the adult’s ability to get around in the community safely and consider their ability to use such facilities as public transport, shops or recreational facilities when considering the impact on their wellbeing’
- ‘6.63 In considering what else might help [people achieve their desired outcomes] authorities should consider the person’s own strengths and capabilities, and what support might be available from their wider support network or within the community to help’.

### 3.2 Demand for travel assistance

3.2.1 Travel assistance has historically often been offered via the Council-owned fleet of buses managed by the Transport Services Unit (TSU), or through private hire vehicles (e.g. taxi’s) organised through the TSU.

3.2.2 Overall, demand for travel assistance has grown in the last four years, as demonstrated in Table 1 below. Since 2015/16, SEND and social care passenger numbers have collectively grown from approximately 1,000 passengers to almost 1,200 in 2019/20, increasing the associated costs by 38%, from £5.7m to £7.6m. These increases have added further strain to service areas that already under significant pressure from cost and demand growth. Passengers for the internal fleet and external private hire vehicle service have grown at different rates. In total, all TSU passengers have grown by 2%, while passengers using the private hire vehicle framework have risen by almost 10%.

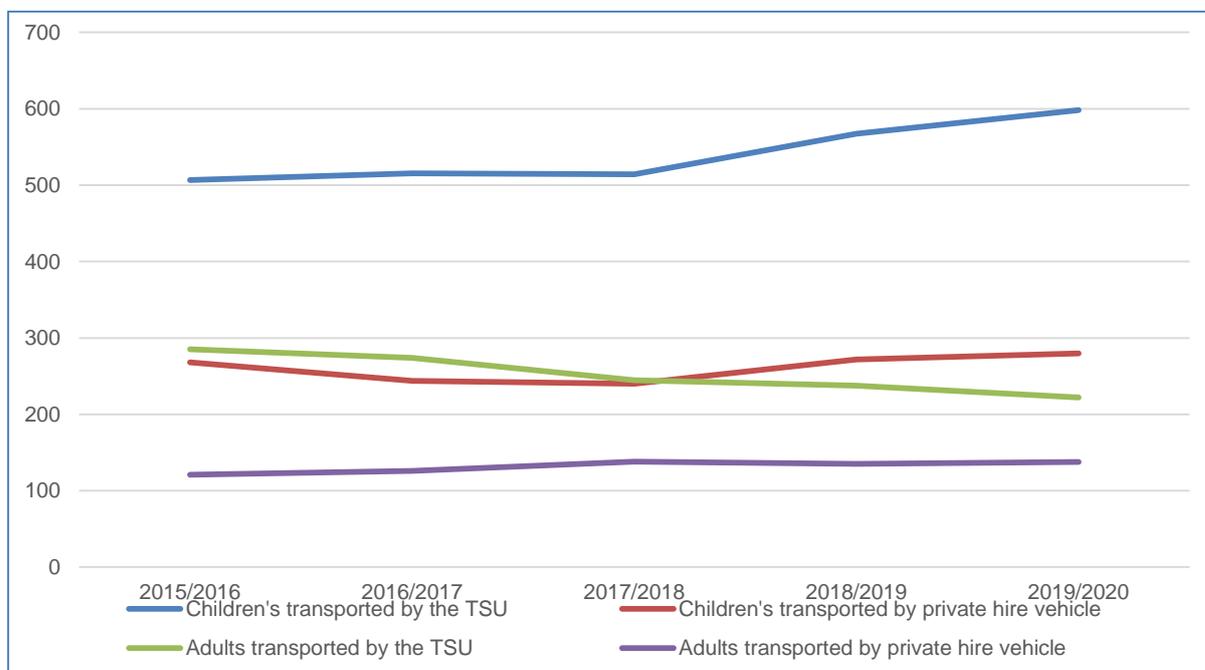


Table 1: Number children, young people and adults provided with travel assistance via the TSU, 2015/16 to 2019/20

3.2.3 Of the 817 children and young people with SEND currently receiving transport assistance Tower Hamlets:

- 42 are of nursery or reception age;
- 357 are attending primary school;
- 293 are attending secondary education; and,
- 119 are attending post 16 education.

3.2.4 Adult social care passenger growth is more nuanced: Overall, there has been a reduction in the number of adults getting travel assistance: 30 fewer adults receive travel assistance now compared to in 2016/17. Within this overall reduction, TSU fleet passengers have shrunk by 17%. However, passengers using private hire vehicles commissioned through the council framework have risen by 11%. Furthermore, the forecast future demand in relation to children with SEND influences the forecast future demand for adults later down the line; so overall, a slight increase in the future demand for adult travel assistance is still anticipated.

3.2.5 Passenger assistants across both Adults and Children’s Services have also increased significantly, from 153 to 230, up 30% since 2015/16.

### 3.3 Costs

3.3.1 In line with an overall increase in demand, TSU service costs have increased by 16% over the last four years from £3.8m to £4.5m, and external transport (i.e. private vehicle hire) costs have increased by 66%, from £1.9m to £3.9m. Children’s Services have experienced the most significant growth during the period, with total service users growing 11%.

3.3.2 Table 2 (below) sets out the budget for travel assistance against expenditure over the last four years. Table 3 sets out expenditure in more detail.

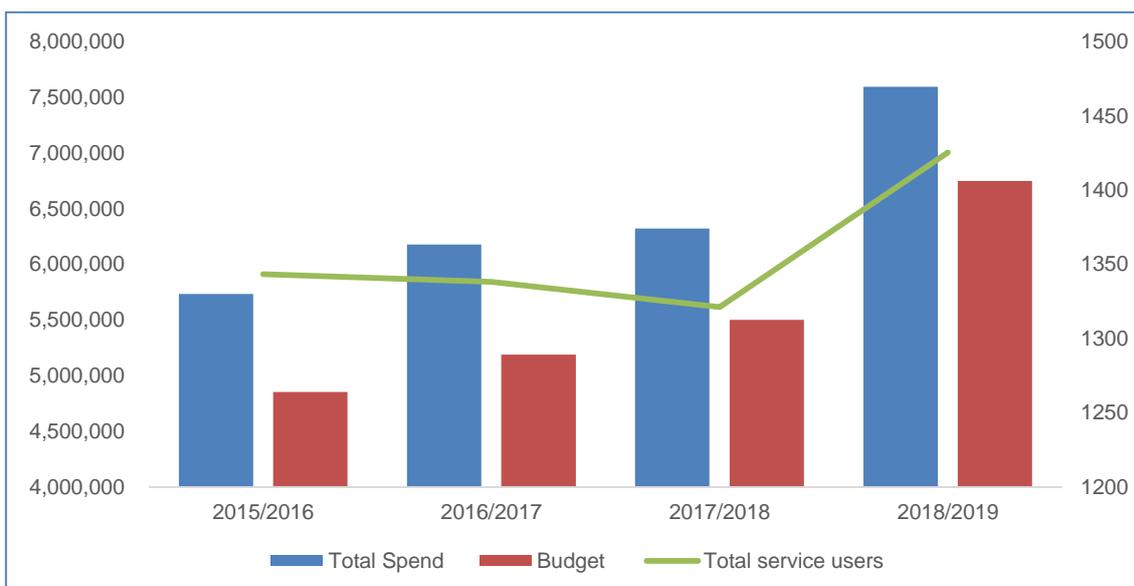
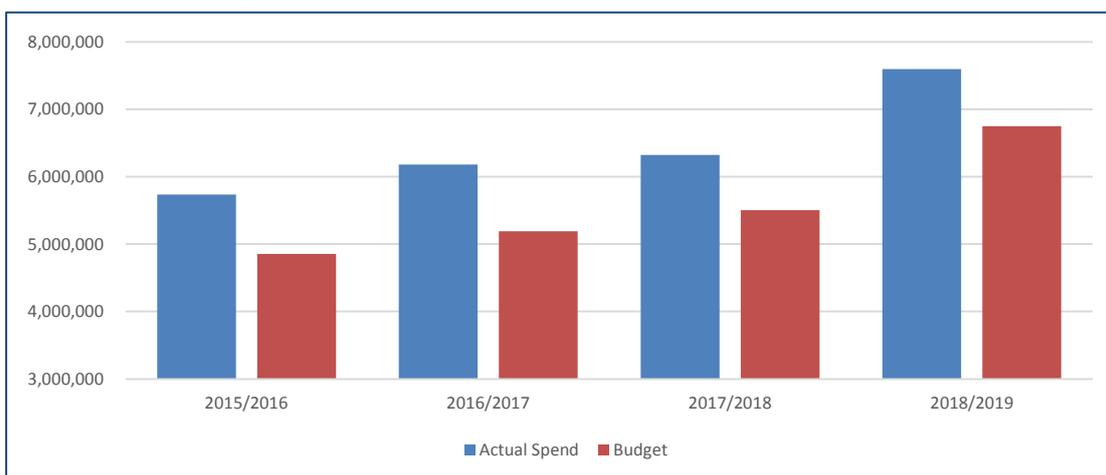


Table 2: Historic Budget v. Actuals, 2015/16 to 2018/19

	2015/2016	2016/2017	2017/2018	2018/2019
TSU Department Charges (£)	3,828,951	3,974,978	4,000,082	4,430,870
External Transport Costs (£)	1,904,696	2,205,053	2,322,410	3,163,163
<b>Total Spend (£)</b>	<b>5,733,646</b>	<b>6,180,031</b>	<b>6,322,492</b>	<b>7,594,033</b>

*Table 3: Council expenditure, 2015/16 to 2018/19*

- 3.3.3 The total spend for Children's Services in 2015/16 was £3,859,950 and in 2017/18 - the latest actual figures available - the spend was £4,134,466, an increase of 7%. This indicates that Children's Services have managed costs well over the period as there has been no significant increase in actual costs incurred. However, there was a significant increase in expenditure in 2018/19 with the bulk of the increase coming from external transport costs. The performance of Children's Services transport over the period shows that between 2015/16 and 2017/18 the actual expenditure exceeded the budgeted expenditure by around £1m. This is set out in Table 4 below:



*Table 4: Actual spend and budget on travel assistance, Children's Services*

- 3.3.4 In total, the council is spending £469,118 on external transport for children under and over the compulsory school age.
- 3.3.5 In adults, spending increased from £1.9m in 2015/16 to £2.2m in 2017/18, before dropping back to £1.9m in 2018/19. In each of these years the actual expenditure incurred was less than the budgeted amount. This indicates strong cost control and budgeting in adult social care in relation to the delivery of the internal and external transport functions.

### 3.4 National context

- 3.4.1 The council is not alone in trying to mitigate the trend of increased pressure for travel assistance, with a focus on children with SEND. A paper published by the

Local Government Association <sup>4</sup> in November 2019 concludes that between 2014-15 and 2017-18, the total national spend on home-to-school transport increased from £1.02 billion in 2014-15 to £1.08 billion in 2017-18 – an overall increase of 6.5%. The percentage of councils that are overspending their home to school transport budgets increased from 71% to 83%. The total national deficit on home to school transport now stands at £111 million.

### 3.5 Existing strategic commitments in relation to travel assistance

- 3.5.1 In addition to a backdrop of rising overall demand, it should be highlighted that the council is clear in its commitment to improving support for and the quality of life of people with disabilities and the support provided to their families and carers. This is set out in our strategic plan and other council partnership plans and strategies that include Every Chance for Every Child, the Children and Families Strategy, the SEND strategy, the Health and Wellbeing Strategy, the Ageing Well Strategy, the Learning Disability Strategy and the Adult Mental Health Strategy. Collectively, these strategies articulate our commitment to empowering residents to be as resilient and independent as possible.
- 3.5.2 Applying this to travel assistance, the aspiration is to support children, young people and adults to develop a range of skills and build confidence to travel independently and wherever possible in the wider community use the most appropriate methods of transport confidently and safely.

## 4. **STRATEGIC REVIEW OF TRAVEL ASSISTANCE**

### 4.1 Introduction

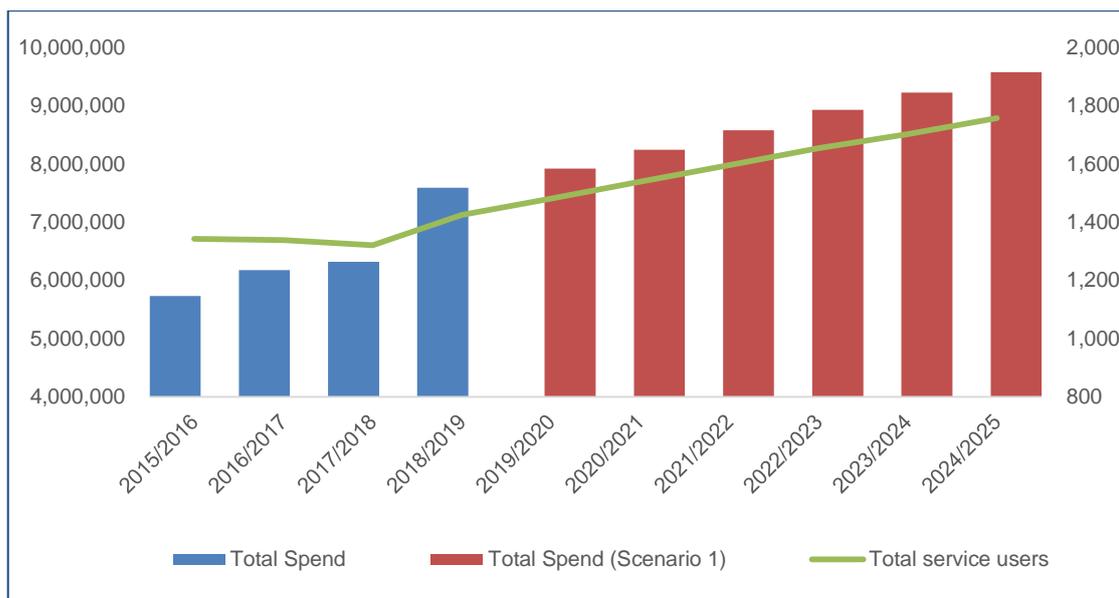
In light of the challenges described in section (3), the council commissioned Grant Thornton UK LLP to undertake a strategic review of SEND and Social Care Transport. The review was designed to gain additional insight into current operations of the service as well as support a corporate aspiration to align multiple transformation workstreams currently underway across three Directorates.

### 4.2 Future demand

The insight generated from this review indicates that we can expect demand to continue to rise if no action is taken. This demand is driven from children with SEND, but will have consequent implications for demands on adult social care. Projected future demand and users is set out in Table 5 below:

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<sup>4</sup> <https://www.local.gov.uk/school-transport-under-threat-bill-set-rise-ps12-billion-2024>



*Table 5: Projected demand for travel assistance (“do nothing” option)*

### 4.3 Future spend

The review found that if no remedial action is taken to dampen future demand or improve the efficiency and effectiveness of either the internal or external service, we can expect total spend to increase from £7.9m this year to £9.58m in 2024/25, representing a 20.9% increase over this time period. Total service users are projected to increase from 1,482 to 1,759.

### 4.4 Existing alternatives to the Transport Services Unit

4.4.1 The review – and existing travel assistance policies in the council – also confirm that travel assistance through the internal TSU fleet and the external services organised by the TSU are not the only forms of travel assistance available. Alternative options that are in line with the council’s strategic aims to promote independence include:

- I. A freedom pass to enable people to travel, accompanied as necessary, using any public transport service.
- II. A travel pass to enable a child to travel to school accompanied, if necessary, by an adult via public transport solutions.
- III. Access to the taxi card scheme which subsidises the cost of taxis for people with serious mobility problems who cannot use public transport.
- IV. Independent Travel Training provided by the council, focused on the needs and capabilities of an individual.
- V. Parental reimbursement at the council’s standard rate which may be reviewed later, for using their own vehicle to transport their eligible child to and from school.
- VI. Direct payments from the council to adult service users, parents or carers where there is an interest in people arranging transport themselves.
- VII. Some council-commissioned services already provide their own transport, such as day services.

4.4.2 The review found that - despite the range of interventions and support listed above - most children and young people deemed eligible for transport assistance by the council are placed on private hire vehicles or buses run by the TSU. Furthermore, anecdotal feedback is that many residents expect to be provided with a place on council transport or a seat in a private hire vehicle, irrespective of their need. The risk is that this undermines the council's aspirations in other policy areas as well as potentially impacting negatively on individual and family's independence.

4.4.3 However, the review found that interventions in adult social care to promote independence had resulted in positive outcomes for service users and the council. A focus on empowering people to travel independently and offering Independent Travel Training as a core part of this has led to an overall reduction in service users receiving travel assistance (30 fewer service users since 2016/17) and council expenditure. Reliance on the TSU service has reduced overall.

#### 4.5 Other findings

4.5.1 The review also identified the key factors to rising cost:

- I. The council provides a significant amount of 'discretionary' travel assistance in addition to the statutory requirements;
- II. Alternative options to the use of bus and private hire vehicles such as personal travel budgets for children with SEND, have been underutilised not actively promoted, creating an over-reliance on the internal transport service and private hire vehicles;
- III. Historically, the internal fleet has been poorly utilised, with routes planned on a manual basis;
- IV. There is limited customer and performance management data, restricting the council's ability to ensure that decisions are informed by evidence

4.5.2 The review found that the council has conducted several operational investigations and has attempted various interventions to drive down service costs and curb demand. For example, a reduction in some adult passengers has been partly attributed to successful interventions such as the rollout of Independent Travel Training and amending the referral pathway. Other interventions, such as the re-commissioning of external transport, have not produced the expected outcomes, resulting in reduced access to the marketplace and increasing the cost of the external framework.

4.5.3 The review also noted that it is widely accepted and stipulated by many councils that wherever possible, parents and carers should seek to make arrangements for their child to attend school in the same way as parents and carers of pupils without an Education, Health and Care Plan (EHCP). This is viewed as an essential factor in developing the child's independence, social and life skills. Most children with an EHCP do not require specialised travel assistance. Travel assistance for children with an EHCP or SEND should be offered based on the individual needs of a child. In some situations, children

who do not have an EHCP but have medical needs which affect their mobility may also be eligible for transport.

#### 4.6 Options arising from the review

The review resulted in four main cumulative options – reviewed by the Mayor’s Advisory Board in summer. The options were:

*I. Option 1: Status quo (do nothing)*

This option involves taking no remedial action to dampen future demand or improve the efficiency and effectiveness of either the internal or external service.

*II. Option 2: Operational efficiencies*

This option maintains the existing delivery model, while making a number of operational efficiencies. These include improving the utilisation rates of the internal fleet, addressing the split of routes between the internal fleet and external providers, recommissioning the external service through a robust Dynamic Purchasing System and, improving existing operational and performance management systems and deployment of resources.

*III. Option 3: Supportive policy improvements*

This option maintains the existing delivery model, making all operational efficiencies included in option two and to better implement a broader range of supportive passenger assistance policies.

*IV. Option 4: Restrictive policy and structural changes*

This option would maintain the existing delivery model, making all operational efficiencies and supportive policy improvements included in option 3 and to implement a number of restrictive policies, such as stopping the provision of discretionary services for children with SEND.

4.7 Following discussions at the Mayor’s Advisory Board on these options, Option 1 was not recommended. Officers were asked to implement the core components of Option 2. This has been taken forward, with officers managing progress through internal action plan, officers were asked to progress exploring Options 3 and 4. The attached Travel Assistance policy represents an articulation of Option 3. What the policy describes, the work associated with it, the implications for children, adults and the local authority overall, and why this option has been progressed is explained in the next section.

## 5. THE PROPOSED NEW TRAVEL ASSISTANCE POLICY

### 5.1 Introduction

5.2 The proposed new Travel Assistance policy (Appendix I) brings together and strengthens existing policies in Children’s Services and in Adult Social Care. The policy is an articulation of Option 3 and is in line with our strategic commitments: It aims to ensure that personalised support is provided to residents who need it, with a focus on promoting independence. It is intended to strengthen and refocus our commitment to developing people’s strengths and capabilities, and improving the life chances of children with SEND and the support provided to their families and carers. It also provides the opportunity to update the council’s policies in line with the Government’s latest guidance.

5.3 Overall, maintaining a mixed economy model of delivery, making operational efficiencies relating to both the internal service and implementing a broader range of supportive passenger assistance policies is anticipated to result in benefits for the local authority and for residents.

#### 5.4 Content of the policy

5.4.1 The new Travel Assistance policy enables Adult Social Care to continue on its current trajectory, supporting adults to travel independently where possible and to have a choice over travel assistance when this assistance is needed.

Although the revised travel assistance policy for adults has been updated to bring it into one overarching policy for the local authority, it is important to note that there are no specific changes to the support being offered by the council to adults with social care needs.

5.4.2 For children with SEND, the new policy includes a new set of questions to guide robust assessments – learning from work already carried out in adult social care. These questions are focused on promoting independence and will be used as a basis for a new referral and assessment pathway<sup>5</sup>. The questions are:

- I. What is the distance and complexity of the journey to and from school, and what are the public transport routes available?
- II. Would the child have considerable difficulty in walking or using public transport due to their special educational needs or disability?
- III. Does the child's special educational need or disability rule out the use of free public transport, or is suitable public transport is not conveniently available? – for example wheelchair users, specialist seating, harnesses, head restraints or other specialist facilities
- IV. Does the child have emotional/behavioural difficulties that severely affect their ability to use free public transport or would the child be vulnerable and at risk of danger to themselves, or the general public, if they use public or other transport (accompanied as necessary)?
- V. Would the child be able to travel independently to school if suitably travel trained?

5.2 The policy aims to enable officers through the annual review to offer, where appropriate, a broader range of travel assistance to children with SEND and their families. This includes expanding the existing Independent Travel Training travel programme, offering direct payments and travel allowances and expanding the number of travel passes provided. This signals a move away from a position whereby the council is providing either an internal service or a private hire vehicle by default.

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<sup>5</sup> It is intended that there be a revised referral and assessment pathway for children with SEND. This is being developed and a report is expected by 7<sup>th</sup> December. It will sit alongside the attached updated Travel Assistance policy to help ensure that the policy is reflected in practice.

- 5.3 The revised home to school travel assistance policy makes the policy compliant with updated statutory guidance from Government and aims to better support greater independence as children and young people follow a pathway to adulthood<sup>6</sup>.
- 5.3.2 The differences between the current and proposed new Travel Assistance policy are described in more detail in Appendix IV. Overall, the revised policy:
- Continues to place emphasis on empowerment and promoting independence, strengthening and setting out in more detail how we will apply this in practice;
  - Puts a renewed emphasis to offer, where appropriate, a broader range of travel assistance to children with SEND, such as personal travel budgets and travel cards, and therefore move away from a position whereby the council is providing either an internal service or a private hire vehicle by default; and,
  - Alters the type of ‘discretionary’ travel assistance that will be provided by the council to children with SEND, restricting the use of the internal fleet and private hire vehicles commissioned exclusively to those who the council has a legal duty to provide transport assistance.
- 5.3.3 Once adopted, we will have the opportunity to reassess current service users under this revised policy, ensuring that each passenger is using the most appropriate methods of transport confidently and safely<sup>7</sup>.
- 5.3.4 For children and young people, this is likely to mean transitioning a range of different passengers away from the transport provided by the internal TSU or private hire vehicles, to one of the other forms of assistance available. All of these are more conducive to support greater independence, and in the longer term, a better quality of life. For children and young people, the annual review will generally be the vehicle for any change in the travel assistance offered and ideally this would be co-designed with families.
- 5.3.5 Appendix V provides an overview of the number of children travelling on either a bus provided by the internal TSU or in private hire vehicles, by SEND category and distance travel. Passengers have been grouped into ‘under 8’ and ‘over 8’ and ‘over’ and ‘under’ the statutory walking distance. This is important

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<sup>6</sup> The latest guidance from the Department for Education states that: ‘an effective home to school travel policy will clearly explain the four categories of eligible children; any other help with home to school travel the local authority provides using its discretionary power; how and when parents should apply for free home to school travel (or other help with home to school travel); how children’s eligibility will be assessed; how the local authority measures distance for the purposes of assessing eligibility, and how it assesses route safety; In instances of dual living arrangements, such as equal shared custody for separated parents, how the local authority determines the child’s home; the ways in which free or discretionary home to school travel will be provided; for example, dedicated school bus, bus pass for use on public service buses, dedicated taxi; any charges made for discretionary transport; and how parents may appeal against the local authority’s decision in relation to home to school travel for their child.

<sup>7</sup> National guidance that is currently out for consultation states: “A child’s needs may need to be reassessed from time to time, for example, as the child’s needs change or if any changes are made to the travel arrangements. Some children with special educational needs can find change distressing. Local authorities should, therefore, provide parents with as much notice as possible of any changes in a child’s travel arrangements”.

as for home to school transport, 611 of the 815 children currently receiving transport assistance live within the statutory walking distance, and travel assistance should be offered based on an assessment of the individual's mobility and the distance from home to school may influence the type of travel assistance.

#### 5.4 The anticipated impact of the new Travel Assistance policy

- 5.4.1 Overall, it is intended that the new Travel Assistance policy will empower and promote the independence of children with SEND, and adults with social care needs.
- 5.4.2 An example of this transition could be in the type of assistance provided to children under compulsory school age. Currently, the council transports 42 children under the age of four at an annual cost of approximately £240,000 per annum. Yet the council has no legal obligation to offer travel assistance to children under the age of 5. Recognising the benefit, in some circumstances, of supporting these children to attend specific settings from an early age, the council could instead choose, as many other councils do, to provide support exclusively in the form of a personal travel budget. As an illustration, if each of these families were reimbursed the cost of an annual travelcard (zones 1-3) at c. £1,648, instead of the being given a place on a council bus or in a private hire vehicle, this annual cost would reduce to £70,000 per annum. This frees up resources equivalent to £170,000 to be redirected to services provided to those where the council has a statutory duty.
- 5.4.3 Another example would be supporting more families that have children of compulsory school age (between 5 and 17) and that are eligible for home to school transport to take up personal transport budgets. The council currently transport 226 children in private hire vehicles at an average cost of £12,502 per child per annum. As an illustration, if 20% these families were provided with a personal transport budget (a number similar to other London Boroughs) of £4,000 per annum, this would reduce annual expenditure on private hire vehicle by £384,000.
- 5.4.4 The potential impact on children, families and adults with care needs is explored in more detail in the attached Equalities Analysis.
- 5.4.5 In terms of demand and expenditure, it is anticipated that the combination of operational, commercial and policy improvements could reduce service costs by up to £1.4m over next two to three years commencing from 2021/22 with opportunities for further reductions.
- 5.4.6 Table 6 illustrates the original proposed impact of making these changes on future council spending in more detail. It is expected that the proposed changes will take time to embed and will likely deliver over a longer term as behaviours start to shift towards the required outcomes. Most of the benefits are expected to be delivered from 2021/22 onwards in line with the savings proposals. For example, the Dynamic Purchasing System in the TSU will require strong market engagement on an ongoing basis to facilitate better

competition to drive through prices alongside improving on alternatives to direct transport provision. From 2021 to 2024, total spend increases from £6.1m to £7.1m. This represents a 15% increase over that time period.

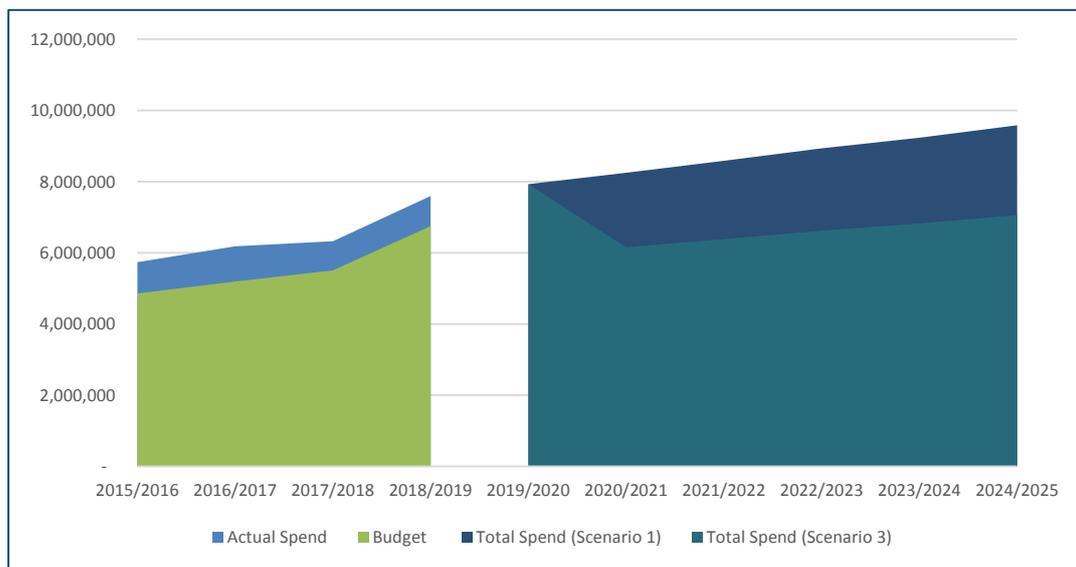


Table 6: Actual and projected spend, options 1 and options 3

## 6. FURTHER FINANCIAL CONTEXT

- 6.1 In 2018/19 the budget of Children's Services increased significantly, by £1.2m from the 2017/18 budget. The reason for this increase is that Children's Services were granted additional funding of £1.2m to cover cost pressures the services has experienced. £1m of this funding was granted to cover internal transport costs and the remaining £0.2m for external transport services. However, this increase in budget has been accompanied by an increase in forecast expenditure meaning the budget does not reflect the actual cost.
- 6.2 As part of the 2020/21 budget setting process there is a growth proposal that seek to address this funding inconsistency. However, the expected efficiencies and operational changes that will be required under the proposals will contribute to future savings on transport.
- 6.3 To support the future savings on transport various initiatives will be undertaken that will seek to reduce the proposed spend from 2021/22. The action plan will ensure that all initiatives are co-ordinated to achieve maximum impact.

## 7. OTHER CONSIDERATIONS

- 7.1 Changes to the policy will only be effective if they are implemented correctly and robustly. We need to ensure robust financial and performance management controls are in place. This may include retraining for staff currently involved in delivering these services. The improvement plan needs to incorporate action from the review, audit and equality analysis and its implementation reviewed by a new service improvement group.

7.2 Part of the council's fixed roster bus services for children with SEND and adult social care users is delivered internally by the Transport Service Unit (TSU) in the Place Directorate. The fleet of vehicles is owned by the council and the planning and operation is managed by a dedicated team, which includes drivers that are directly employed by the council. There are several advantages to this approach:

- The council retain complete operational control of a key public service that is underpinned by statute;
- They are free to adapt the service to changing circumstances including changing demand patterns for different schools and adult social care services without being locked into a contract; and,
- The council may also be able to achieve economies of scale when purchasing their fleet and its maintenance given their large purchasing power.
- The council is currently assessing the state of its fleet and will be undertaking an exercise to lease new fleet to replace the ageing fleet.
- The approach to lease will provide the service some capacity to flex in response to the changing needs of demand.

7.3 As well as the pre-existing commitment to promote independence, it is also useful to highlight that the council is also committed to reducing traffic congestion, improving road safety and reducing the environmental impact of vehicle journeys by promoting the use of alternative forms of travel, such as walking, cycling and use of integrated public transport. Due consideration will be given to the above commitment when designing any future approach.

7.4 Additional consideration will be required to understand any resource requirement by services to undertake the changes agreed in line with the new policy.

7.5 The changes being proposed in this report have been considered in the context that the existing bus fleet (which accounts for a significant proportion of the travel assistance currently provided to children and adults) is ageing and in need of replacement, so will inform investment decisions in this area.

## **8. EQUALITIES IMPLICATIONS**

8.1 An Equalities Assessment has been included as Appendix II.

## **9. OTHER STATUTORY IMPLICATIONS**

9.1 These are described in the body of the report.

9.2 Best Value Implications: The council is obliged as a best value authority under Section 3 of the Local Government Act (1999) to "make arrangements to secure continuous improvement in the way in which its functions are exercised having regard to a combination of economy, efficiency and effectiveness". The proposal will seek to provide better value for the council through improved commercial arrangements and better use of existing resources.

## **10. COMMENTS OF THE CHIEF FINANCE OFFICER**

- 10.1 Transport Services for Childrens SEND and Adults Social Care clients are provided internally by the Transport Service Unit (TSU) bus fleets or commissioned externally by private hire vehicles. For 2019-20 Childrens SEND has a total transport budget of £4.370m and is forecasting a budget pressure of £1.545m. Adult's social care has a transport budget of £2.330m and is forecasting a balanced budget.
- 10.2 There has been a significant increase in transport costs since 2015-16. In total TSU costs have increased from £3.8m to £4.5m (16%) and external transport costs from £1.9m to £3.9m. Childrens Services have seen the most growth with service users during this period (approx. 11%)
- 10.3 The 2019-20 Childrens SEND budget includes a one-off growth allocation of £1m which is due to be reversed in 2020-21. Due to the ongoing SEND pressures, Children & Culture have submitted a growth bid for £2.5m in the 2020-21 MTFS. This amount will negate the reversal of the £1m and offset the £1.5m pressure.
- 10.4 The recent Grant Thornton review identified that the council would have to make substantial improvements in the efficiency and effectiveness of travel support to avoid future increases in costs and pressures to the services. In order to achieve this target the SEND action plan was presented and agreed by CLT & MAB in September 2019 formed the basis for this report.
- 10.5 Option 2 sets out the operational efficiencies required in order to reduce costs. The progress and next steps are detailed in Appendix 2. The introduction of new commissioning arrangements through a new Dynamic Purchasing System to increase the range of providers used is expected to decrease costs, along with the introduction of new SEND transport policies to support children and families to access alternative means of travel, including the use of direct payments and maximising use of independent travel schemes. Maximising use of internal transport services, through improved routes and reducing demand for 'second runs'.
- 10.6 Option 3 incorporates the improvements within option 2, moving on to revise the Travel Assistance Policy for Children's SEND and Adults Social Care Clients with the potential to reduce costs by up to £1.4m across Children's and Adults services.
- 10.7 Option 4 would implement all changes in Option 2 and Option 3 and consider Restrictive policy and structural changes, such as ceasing discretionary services within Children's SEND. This option has not been presented to MAB and would require detailed analysis of cost reduction. This option would be the most radical and disruptive to service users

- 10.8 Children's SEND has a 2-year savings target of £1m to achieve (£0.5m in 2021-22 and £0.5m in 2022-23). If the operational efficiencies and Travel Assistance Policy are not implemented, then the achievement of this savings target would be at risk.
- 10.9 Any reduction in costs for Adults Social Care clients would support the delivery of the Adults services savings target to be delivered in 2021-22 (Promoting independence and in borough care for adults with disabilities)

## **11. COMMENTS OF LEGAL SERVICES**

- 11.1 The draft travel assistance policy is consistent with the council's duties in respect of the provision of transport services for children and adults in need of care and support. The key duties which must be taken into consideration are outlined below.
- 11.2 In selecting the option members decide to progress, the council should take into consideration its general duty under section 508A of the Education Act 1996 ('the Act') to promote the use of sustainable travel and transport to and from schools. The Act defines sustainable modes of travel as those that the local authority considers may improve the physical well-being of those who use them, the environmental well-being of all or part of the local authority's area, or a combination of the two. This should take into account the local transport infrastructure.

### Duties to eligible children

- 11.3 Section 508B of the Act places a duty on the council to make such travel arrangements as it considers necessary to facilitate attendance at school for eligible children. Schedule 35B of the Act defines eligible children – those categories of children of compulsory school age (5-16) in an authority's area for whom free travel arrangements will be required - which are outlined in the body of this report and the revised travel assistance policy.
- 11.4 Section 508C of the Act provides the council with discretionary powers to go beyond its statutory duties and provide transport for children who are not entitled to free transport. This includes consideration of paying the reasonable travel costs for a person to escort the child to and from school.
- 11.5 In respect of compulsory school aged children, the council must comply with the statutory guidance "Home to school transport and travel support to education and training" published in July 2014 ("the guidance"). The guidance notes that Transport for London provides free bus passes for all children under the age of 16, therefore London Boroughs may not need to make any additional travel arrangements for children living in their area, particularly when eligibility would be through statutory walking distances or extended rights.

### Duty to publish transport policy for post-16s

- 11.6 Additionally, the council has a duty under sections 508F and 508G of the Act to publish a transport policy statement for young people of sixth form age and adults aged 19 and over (including those with an Education, Health and Care (EHC) plan) in education and training. The Council must also have regard to the statutory guidance “Post-16 transport and travel support to education and training” published in January 2019.
- 11.7 The Post- 16 guidance sets out:

*“The legislation recognises that it is important that decisions on whether local authority arranged transport for this age group is necessary, sits at a local level and, as with the previous duty, the flexibility of the extent of an individual policy lies with individual local authorities. Where local authorities do decide that it is necessary for them to provide transport, this must be provided free of charge, however, the legislation also gives local authorities the flexibility to contribute to, fund or charge for other transport solutions where it wishes.” (paragraph 19)*

#### Duties to adults in need of care and support

- 11.8 Under section 8 and 18 of the Care Act 2014, the council has a duty to meet the eligible needs of an adult in need of care and support, which may include services such as transport. The council must also have regard to the Care and support statutory guidance, updated in October 2018.

#### Consultation and the equality duty

- 11.9 The guidance requires the council to consult widely on any proposed changes to its local policy on school travel arrangements with all interested parties. Consultations should last for at least 28 working days during term time. This period should be extended to take account of any school holidays that may occur during the period of consultation. The proposed consultation complies with these requirements.
- 11.10 When determining its transport policy, the council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who do not (the public sector equality duty). This includes, where appropriate, completing an equality impact assessment which should be proportionate to the function in question and its potential impacts. Given the potential impact on children with SEND, this must have particular regard to the impact of any policy change on children or parents with a disability.

### **Linked Reports, Appendices and Background Documents**

#### **Linked Report**

- None

**Appendices**

- Appendix I – Proposed Travel Assistance Policy
- Appendix II – Draft Equalities Analysis
- Appendix III – Differences between current and proposed Travel Assistance Policy
- Appendix IV – Profile of current SEND users getting Travel Assistance
- Appendix V - Draft indicative Communications and Consultation Plan

**Background Documents – Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2012**

- None

**Officer contact details for documents:**

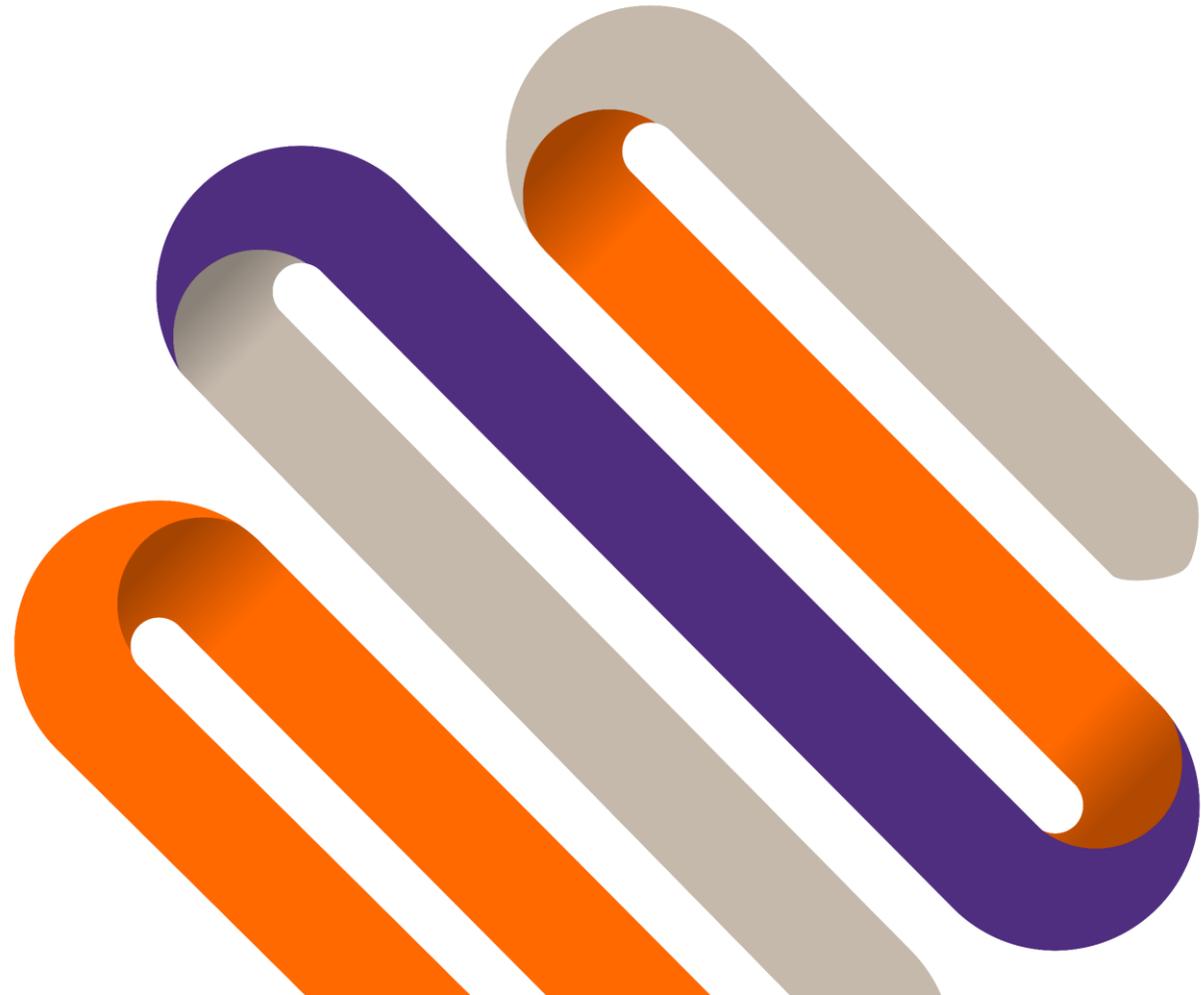
Or state N/A

# Customer Segmentation

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**Improving SEN and Social Care Transport**

1 November 2019



# Executive summary

## Understanding service users

### Scope of work

In January 2019, the Council commissioned Grant Thornton UK LLP to undertake a strategic review of SEN and Social Care Transport.

Given the complexity and scale of this project, we proposed to deliver this work in a single project, split across two defined stages. Our approach to completing this project supports the corporate aspiration to strategically align multiple workstreams currently underway across SEN and social care transport, and the Children's and HAC and Place Directorates. By drawing on a wide range of existing evidence and introducing new expertise alongside a robust forecasting model, our scope for Stage 1 of this project included:

- Creating a 5-year forecast of current and future demand;
- Mapping the Council's spend across different service areas and cost centres, benchmarking costs against local authorities and providing recommendations for a balanced recharging model in the future;
- Reviewing innovation across the transport sector; and,
- Outlining the strategic options available to the Council, considering opportunities for efficiency and new delivery models such as community ownership, direct payments, and integration with other statutory provision.

One recommendation resulting from Stage 1 identified the need for the Council to undertake a customer segmentation exercise, and a review of eligibility, to support the future redistribution of service users across a wider number of supportive interventions.

### This report forms part of three deliverables;

- i. A high-level summary report;
- ii. An interactive dashboard; and,
- iii. A cleansed data-set for the delivery team to use and manage customer data in the future.

### Customer segmentation in SEN Transport

Defined as groups of customers whose needs are similar to each other but different to those of the other groups.

The purpose is to meet customer needs better and allocate resources to greatest gain.

### First principles

- Criteria of segments need to be meaningful;
- We need to understand methods and bases; and,
- Segmentation should be seen as an organisational capability operating across functions

# SEND Transport

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# Overview of current service users: All service users (i)

Local authorities must ensure that suitable travel arrangements are made, where necessary, to facilitate a child's attendance at school.

They must make arrangements to enable a child to travel to school for the beginning of the school day, and to return home at the end of the school day. They are not required to make arrangements for travel between institutions during the school day, or to enable children to attend extra-curricular activities and other commitments outside of school hours.

A local authority is not required to make home to school travel arrangements for an eligible child where, for example, suitable home to school travel is provided by someone else, such as the provision made available to children by Transport for London. Section 508B of the Act deals with the duty on local authorities to make such travel arrangements as they consider necessary to facilitate attendance at school for eligible children. Schedule 35B of the Act defines eligible children. In the Government's most recent consultation, eligible children are defined as:

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## Statutory walking distances

- A child under the age of 8 is eligible for free home to school travel to their nearest suitable school if it is more than 2 miles from their home or, a child aged 8 years or over is eligible for free home to school travel to their nearest suitable school if it is more than 3 miles from their home.

## Special educational needs, a disability or mobility problems

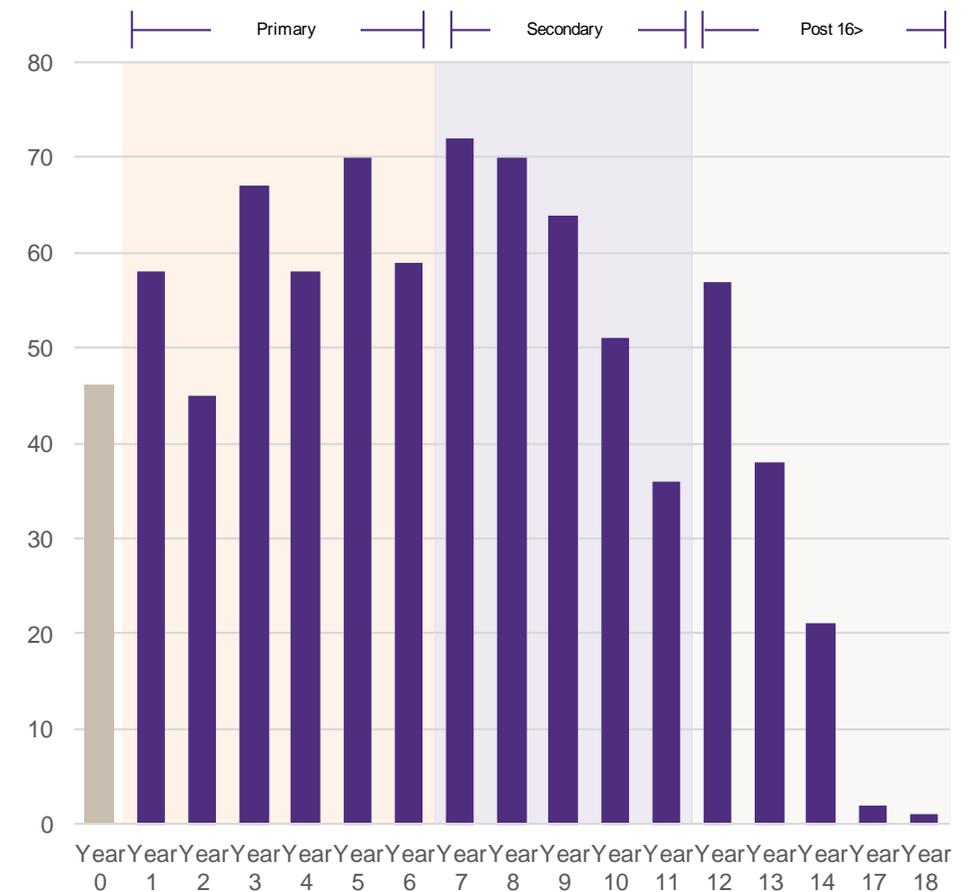
A child is eligible for free home to school travel if:

- they attend their nearest suitable school; and
- it is within the statutory walking distance of their home; and
- they cannot reasonably be expected to walk there because of their special educational needs, disability or mobility problems.

## Extended rights

A child is also eligible for free home to school travel if they receive free school meals or if a parent with whom they live receives maximum Working Tax Credit and when they meet a range of wider criteria.

Chart 1: Number of service users, by school year



# Overview of current service users: All service users (ii)

## A breakdown of existing service users

In total, there are currently **817 service users** in Tower Hamlets:

- 46 of those service users are of nursery or reception age;
- 357 are attending primary school;
- 293 are attending secondary education; and,
- 119 are attending post 16 education

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Chart 2 on the right side of this page highlights the total anticipated spend on external transport, by setting. This is important for the Council to understand and monitor, as the Council's duty varies across different groups.

Regarding home to school transport, the Council's duty applies to children that are of compulsory school age. A child reaches compulsory school age on the prescribed day following their fifth birthday, or on their fifth birthday if it falls on a prescribed day. The prescribed days are 31 December, 31 March and 31 August. A child ceases to be of compulsory school age on the last Friday in June in the school year in which a child reaches age 16.

**In total, the Council is spending £469,118 on external transport for children under and over the compulsory school age.**

It is important for the Council to review the transport provided to these cohorts, to identify whether there is reasonable justification for the provision of service.

<https://www.gov.uk/government/publications/post-16-transport-to-education-and-training>

Chart 2: Expenditure on external transport across settings

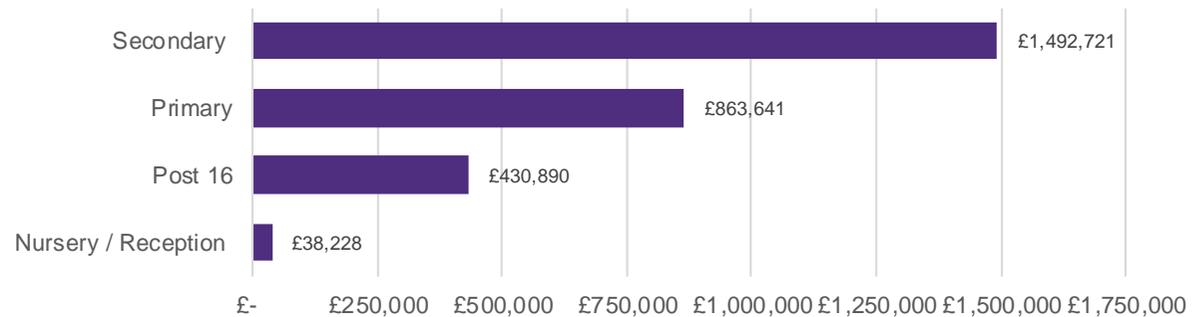
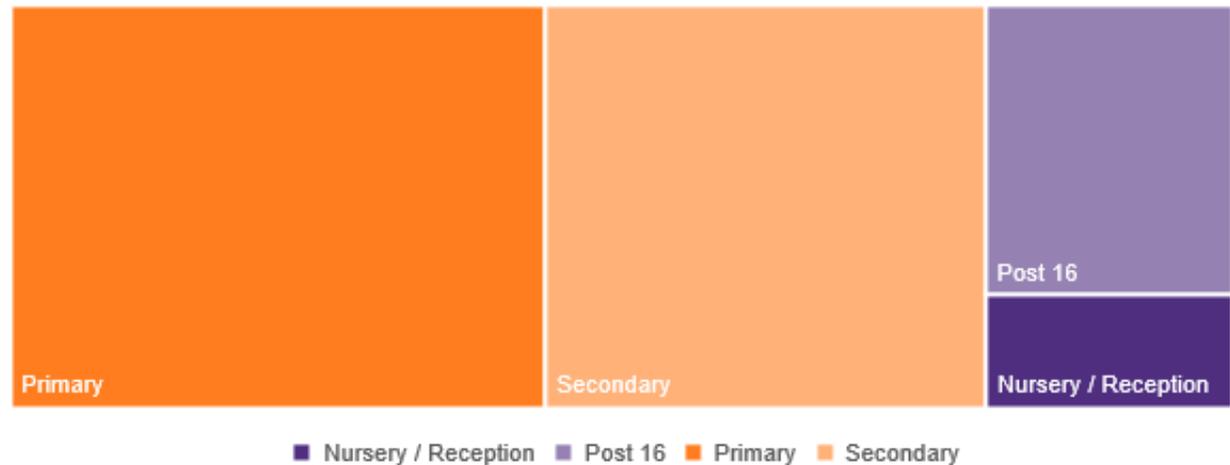


Chart 3: Composition of service users across settings



# Overview of current service users: All service users (iii)

## Children with special educational needs, a disability or mobility problems

In its revised guidance to local authorities, currently under [consultation](#), the Government is advising Councils that “when making transport arrangements for children with special educational needs, a disability or mobility problems, they will need to identify and take account of their particular needs and ensure that the transport they provide meets those needs. For example, children with a high level of need might require the support of a passenger assistant on their journey, or if a child uses a wheelchair, walking frame or other mobility aid, it may need to be transported with them.

A child’s needs may need to be reassessed from time to time, for example, as the child’s needs change or if any changes are made to the travel arrangements. Some children with special educational needs can find change distressing. Local authorities should therefore provide parents with as much notice as possible of any changes in a child’s travel arrangements”.

This revised guidance is important for Tower Hamlets for a number of reasons. Firstly, following stage 1 of the transport review, a number of specific recommendations have been made which could ultimately impact existing travel arrangements. For example, moving a child from a taxi onto an internal bus provided by the TSU. Secondly, in updating both the existing transport policy, and supporting internal service guidance, much more emphasis should be placed on the individual needs of children, and how these need impact the child’s ability to travel independently.

### Redbridge: Home to School Travel Assistance Policy

Children who live within the ‘statutory walking distance’ will not receive Council travel assistance, **except where they have a special educational need or disability which significantly affects their mobility, or there are exceptional circumstances**. In most cases, travel assistance for those who live outside the ‘statutory walking distance’ but who do not have a special educational need or disability will take the form of a Transport for London Zip Oyster Card. For children with a special educational need or disability, travel assistance will be offered based on an assessment of the individual’s mobility, but the distance from home to school may influence the type of travel assistance offered

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Chart 4: Wheelchair and non-wheelchair users by setting

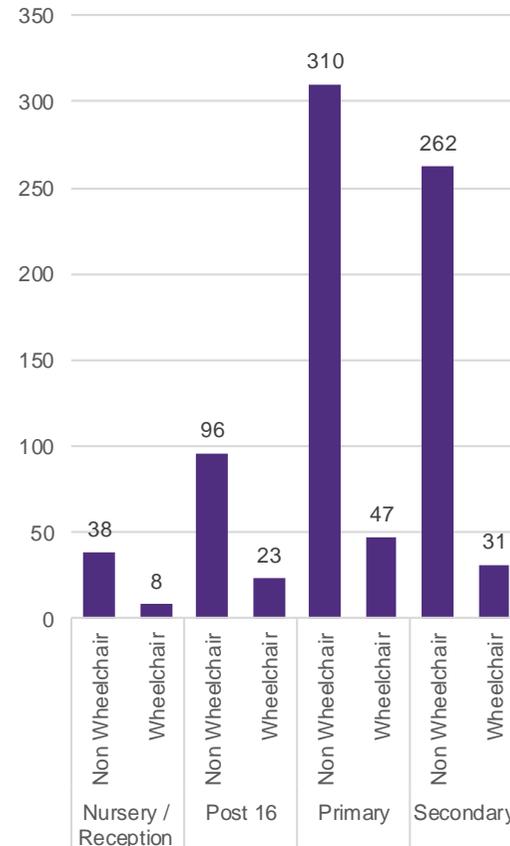
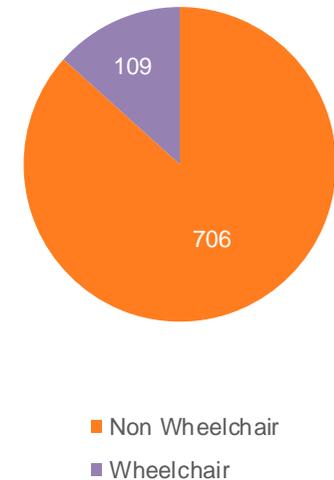


Chart 5: Wheelchair and non-wheelchair users, all service users



# Overview of current service users: All service users (iv)

## Understanding when a child is eligible

Without exception, parents and carers have a (legal) responsibility to ensure that their children attend school regularly, regardless of the child's special educational needs or disabilities.

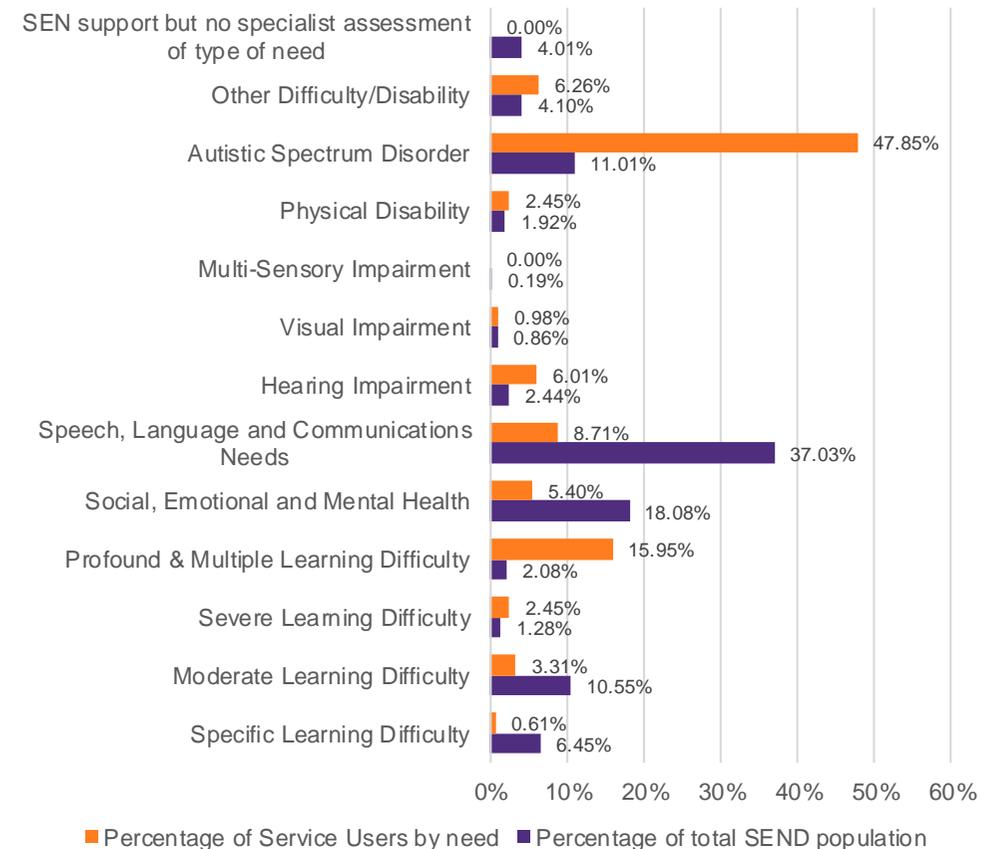
It is widely accepted and stipulated by many Councils, that wherever possible, parents and carers should seek to make arrangements for their child to attend school in the same way as parents and carers of pupils without an EHCP or SEN statement. This is viewed as an essential factor in developing the child's independence, social and life skills. Most children with an Education, Health and Care Plan (EHCP) or SEN statement do not require specialised travel assistance. Travel assistance for children with an Education, Health and Care Plan (EHCP) or SEN is usually offered based on the individual needs of a child.

In some situations, children who do not have an EHCP but have medical needs which affect their mobility may also be eligible for transport. To identify the specific needs of the child, it is expected that a revised referral and assessment pathway should answer the following questions effectively:

- What is the distance and complexity of the journey to and from school, and what are the public transport routes available?;
- Would the child have considerable difficulty in walking or using public transport due to their special educational needs or disability?;
- Does the child's special educational needs or disability rules out the use of free public transport, or is suitable public transport is not conveniently available? – for example wheelchair users, specialist seating, harnesses, head restraints or other specialist facilities;
- Does the child have emotional/behavioural difficulties that severely affect their ability to use free public transport or would the child be vulnerable and at risk of danger to themselves, or the general public, if they use public or other transport (accompanied as necessary)?;
- Would the child would be able to travel independently to school if suitably travel trained?

The following pages starts to outline a number of possible scenarios, using the information provided by the Council and filtering this data based on a number assumptions. The purpose of these scenarios are to highlight where the Council may wish conduct a more in-depth review of existing provision.

Chart 6: Percentage of service users by SEN category against needs of total SEND population, Tower Hamlets



# Overview of current service users: Internal service users (i)

## Identifying different cohort

Of the 590 internal service users in Tower Hamlets, 87 currently use some form of a wheelchair. There are currently 502 services user that are not identified as having a physical disability or needing to use a wheelchair. This starts to determine, at a high-level, where the Council may not have considered how the child's special educational needs or disability impacts their ability to access other forms of transport, such as schemes offered through Transport for London.

Chart 7 highlights that 29 service users accessing the internal service does not have a physical disability or use a wheelchair, but have a hearing impairment. Twenty-five of these children attend Culloden Primary School. 25 Children equate to the capacity of 1.6 busses. Which if they were free, could take on the responsibility of £150,000 worth of external routes.

The Council should review these cases methodically asking:

- Are they attending their nearest suitable school;
- Is the school within the statutory walking distance of their home (19 of the 25 are listing a living less than two miles away); and,
- Could the child be reasonably be expected to walk there, in the context of their special educational needs or disability, with or without additional training or support?

This methodology can then be applied across further cohorts, such as those with moderate learning disabilities. These groups have been outlined, by school, on the next page.

Chart 7: Number of service users by SEND category, excluding wheelchair users

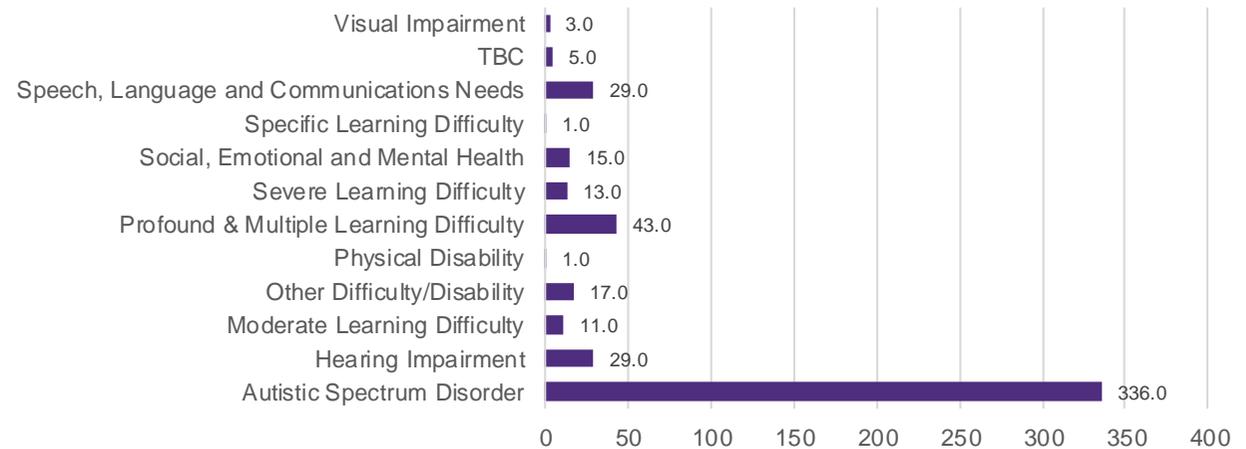
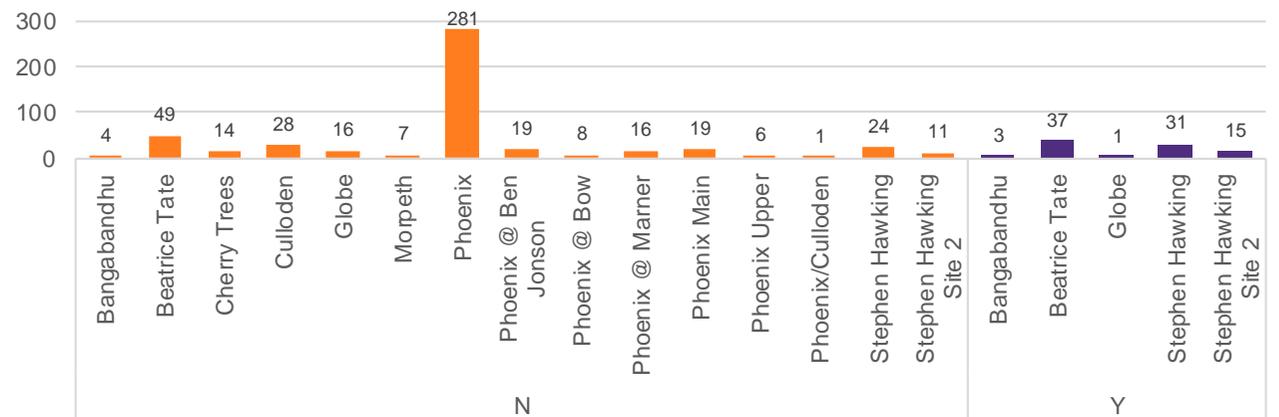


Chart 8: Wheelchair and non-wheelchair users by setting, internal



# Overview of current service users: Internal service users (ii)

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Service users (excluding wheelchair users) by School and SEN Category	Number
<b>Bangabandhu</b>	<b>4.0</b>
Autistic Spectrum Disorder	2.0
Other Difficulty/Disability	1.0
Profound & Multiple Learning Difficulty	1.0
<b>Beatrice Tate</b>	<b>49.0</b>
Autistic Spectrum Disorder	2.0
Hearing Impairment	2.0
Moderate Learning Difficulty	6.0
Other Difficulty/Disability	6.0
Profound & Multiple Learning Difficulty	20.0
Severe Learning Difficulty	8.0
Speech, Language and Communications Needs	4.0
TBC	1.0
<b>Cherry Trees</b>	<b>14.0</b>
Social, Emotional and Mental Health	14.0
<b>Culloden</b>	<b>28.0</b>
Autistic Spectrum Disorder	1.0
Hearing Impairment	25.0
Other Difficulty/Disability	2.0

Service users (excluding wheelchair users) by School and SEN Category	Number
<b>Morpeth</b>	<b>7.0</b>
Autistic Spectrum Disorder	2.0
Other Difficulty/Disability	1.0
Severe Learning Difficulty	1.0
Visual Impairment	3.0
<b>Phoenix</b>	<b>281.0</b>
Autistic Spectrum Disorder	259.0
Hearing Impairment	1.0
Moderate Learning Difficulty	3.0
Profound & Multiple Learning Difficulty	1.0
Severe Learning Difficulty	3.0
Speech, Language and Communications Needs	11.0
TBC	3.0
<b>Phoenix @ Ben Jonson</b>	<b>19.0</b>
Autistic Spectrum Disorder	18.0
TBC	1.0
<b>Phoenix @ Bow</b>	<b>8.0</b>
Autistic Spectrum Disorder	8.0
<b>Phoenix @ Marnier</b>	<b>16.0</b>
Autistic Spectrum Disorder	15.0
Moderate Learning Difficulty	1.0
<b>Phoenix Main</b>	<b>19.0</b>
Autistic Spectrum Disorder	19.0

Service users (excluding wheelchair users) by School and SEN Category	Number
<b>Phoenix Upper</b>	<b>6.0</b>
Autistic Spectrum Disorder	6.0
<b>Phoenix/Culloden</b>	<b>1.0</b>
Autistic Spectrum Disorder	1.0
<b>Stephen Hawking</b>	<b>24.0</b>
Autistic Spectrum Disorder	1.0
Moderate Learning Difficulty	1.0
Other Difficulty/Disability	4.0
Physical Disability	1.0
Profound & Multiple Learning Difficulty	16.0
Severe Learning Difficulty	1.0
<b>Stephen Hawking Site 2</b>	<b>11.0</b>
Autistic Spectrum Disorder	2.0
Other Difficulty/Disability	3.0
Profound & Multiple Learning Difficulty	5.0
Speech, Language and Communications Needs	1.0
<b>Globe</b>	<b>16.0</b>
Hearing Impairment	1.0
Social, Emotional and Mental Health	1.0
Specific Learning Difficulty	1.0
Speech, Language and Communications Needs	13.0

# Overview of current service users: External service users (i)

## Identifying different cohort

Of the total 815 service users, 225 are currently transported through the external framework, at a total cost of £2,825,480 to the Council. There are currently 97 routes in operation across the framework, with the average cost per service user of £12,900.

Chart 9 on the right show the range of destinations travelled to, which is far higher than the internal service.

Chart 9: Number of service users by destination

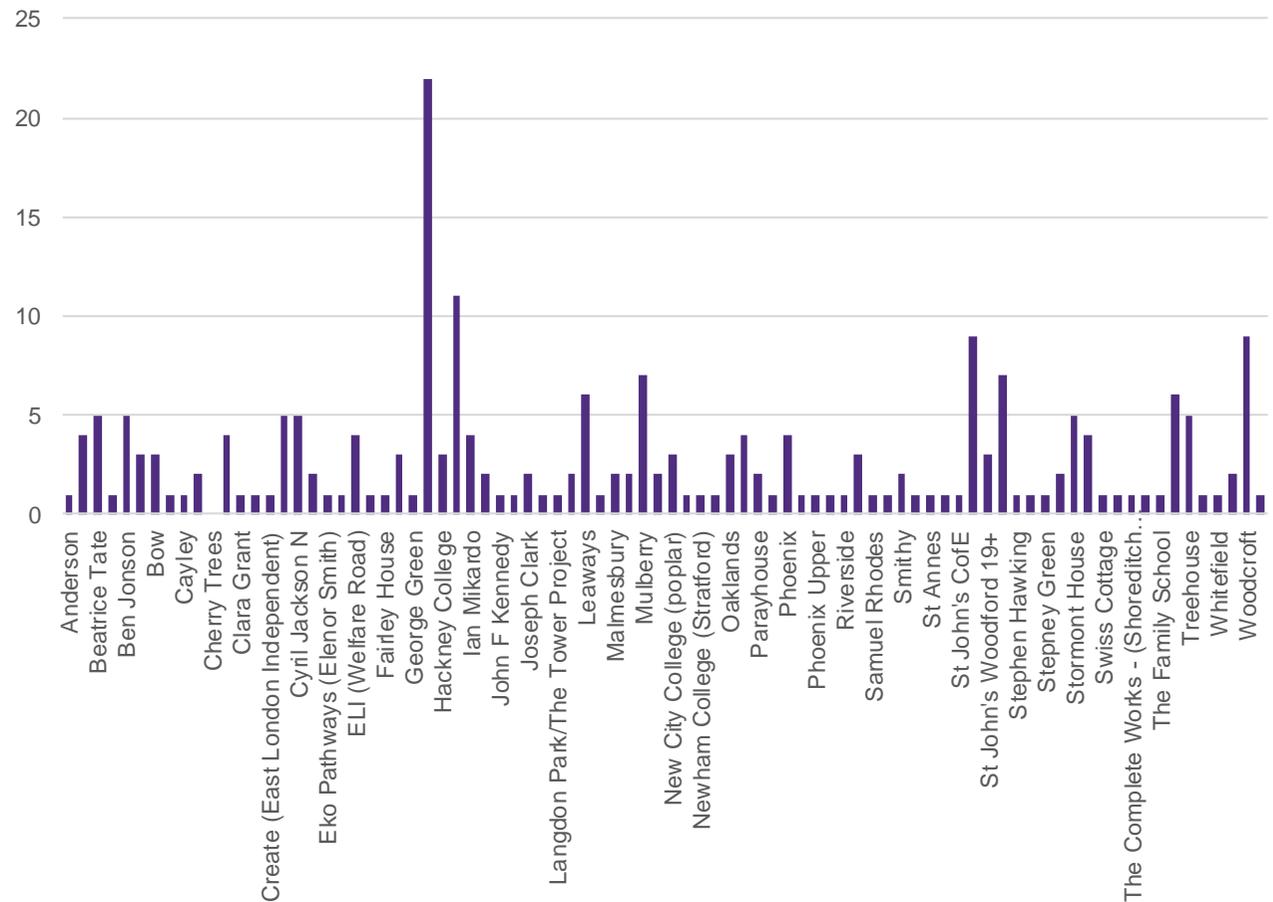
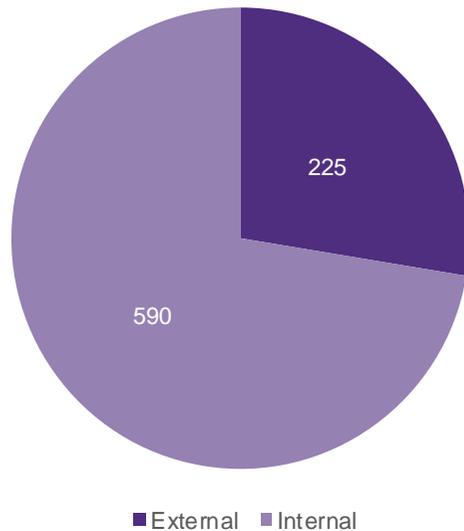


Chart 10: Internal and external service users



# Overview of current service users: External service users (ii)

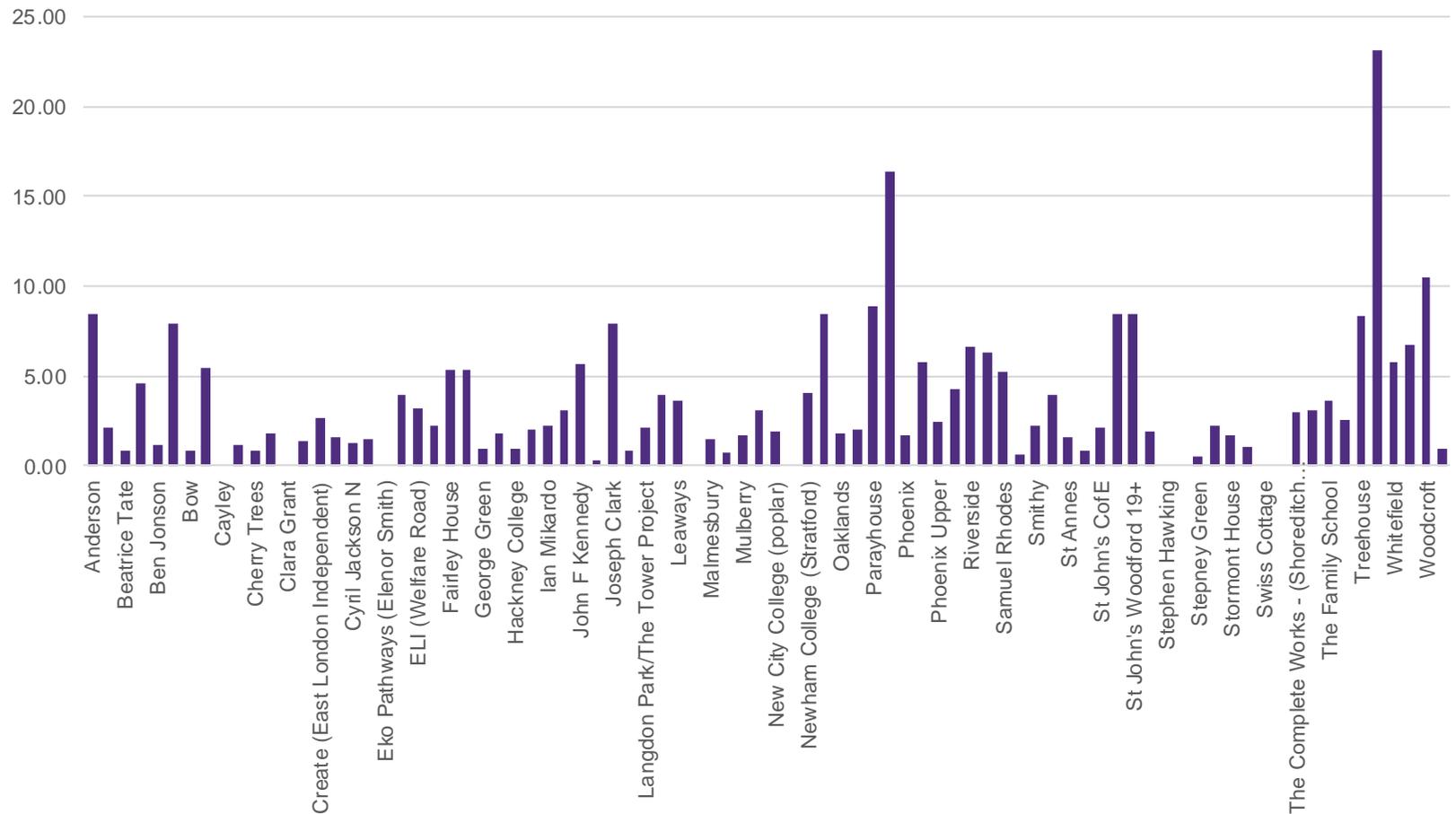
## Distance

Chart 11 on the right shows the average distance travelled by service users to each destination. Understanding distance is critical, given the limitations imposed by the statutory walking distances of 2 and 3 miles. Depending on age.

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The following page breaks down usage of the external framework by those under eight and those over eight.

Chart 11: Average distance travelled by service user to access school.



# Overview of current service users: External service users (iii)

## Service users under eight

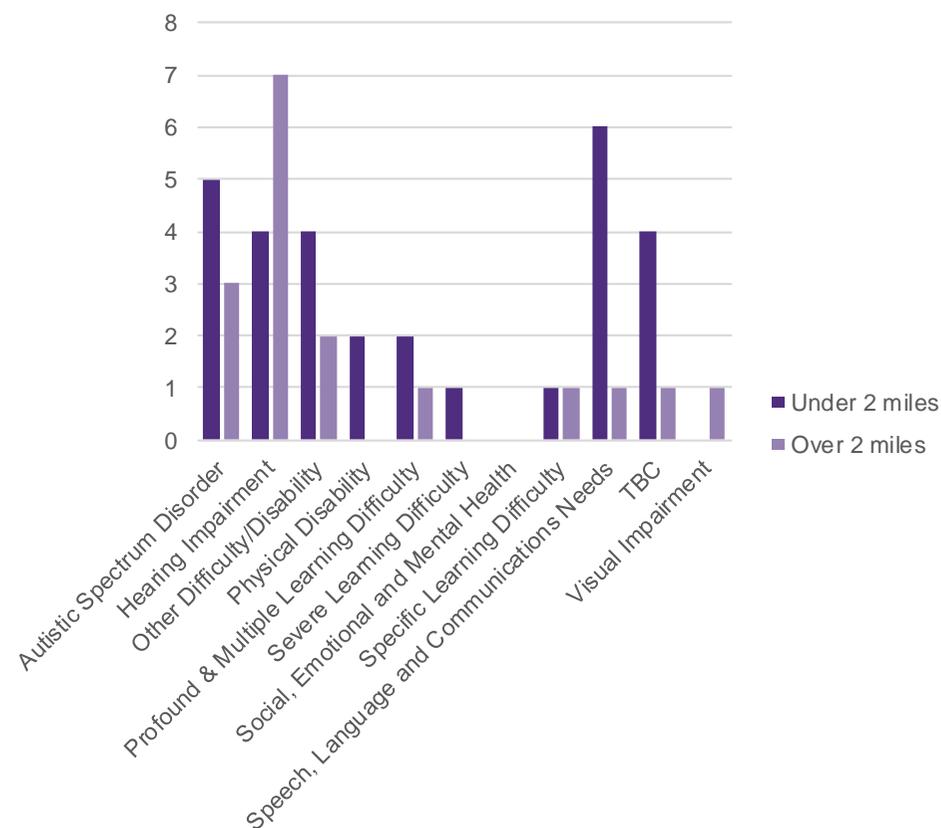
The majority of service users placed on external transport are over eight years old. Only 36 of the 225 children are under eight.

A child under the age of 8 is eligible for free home to school travel to their nearest suitable school if it is more than 2 miles from their home; 17 of the 36 children would meet this criterion, making them eligible for free home to school travel irrespective of their special educational needs or disability. However, spend across the remaining 29 children that live within 2 miles of their school still represents 13% of the total expenditure on external transport.

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Row Labels	Under 2 miles		Over 2 miles	
	Number of children	Sum of Cost	Number of children	Sum of Cost
Autistic Spectrum Disorder	5	£ 65,550	3	£ 46,265
Hearing Impairment	4	£ 21,717	7	£ 58,843
Other Difficulty/Disability	4	£ 44,985	2	£ 33,820
Physical Disability	2	£ 36,733		
Profound & Multiple Learning Difficulty	2	£ 45,280	1	£ 10,640
Severe Learning Difficulty	1	£ 10,260		
Social, Emotional and Mental Health		£ 17,290		
Specific Learning Difficulty	1	£ 10,830	1	£ 11,400
Speech, Language and Communications Needs	6	£ 84,233	1	£ 5,130
TBC	4	£ 38,950	1	£ 19,760
Visual Impairment			1	£ 13,965
<b>Grand Total</b>	<b>29</b>	<b>£ 375,828</b>	<b>17</b>	<b>£ 199,823</b>

Chart 11: Number of service users (8 years old and under), by SEN Category



# Overview of current service users: External service users (iv)

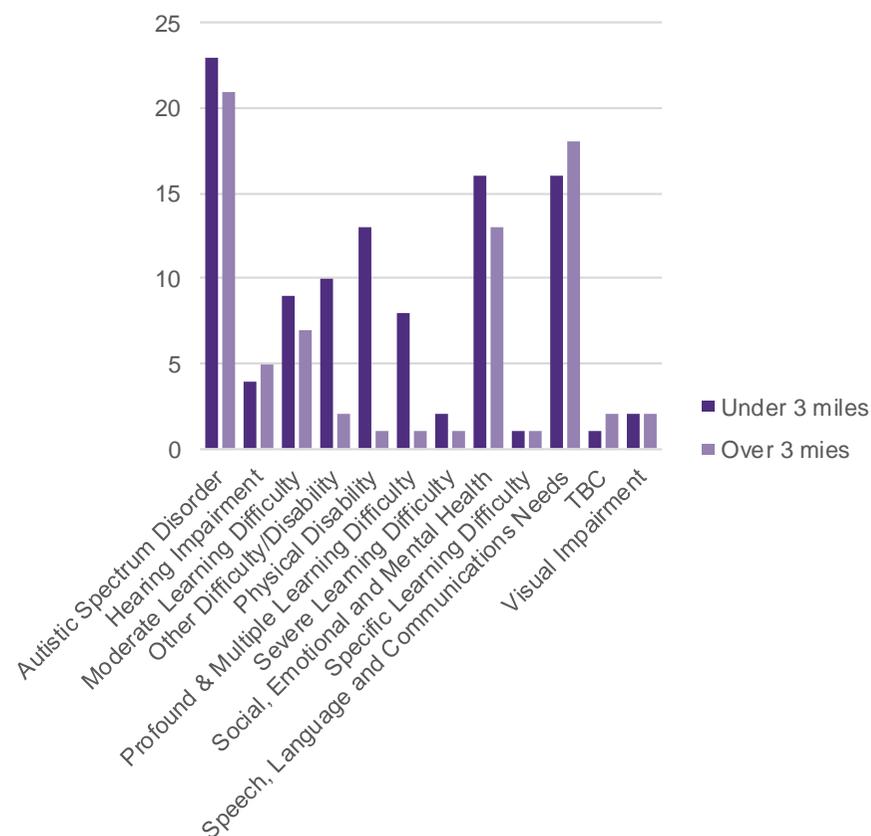
## Service users over eight

179 of the 225 children are eight years old or over, meaning to be eligible for free home to school travel, based on statutory walking distance, their nearest suitable school must be more than 3 miles away; 105 of the 179 children would not meet this criterion, making them only eligible for free home to school travel if special educational needs or disability meant that they could not reasonably be expected to walk.

Using children with a hearing impairment as an example, across these eight children, the Council is spending £45,310 per year on private taxis. The Council should challenge itself by asking whether the child can be reasonably be expected to walk there, in the context of their special educational needs or disability, with or without additional training or support?

Row Labels	Under 3 miles		Over 3 miles	
	Number of children	Sum of Cost	Number of children	Sum of Cost
Autistic Spectrum Disorder	23	£ 309,926	21	£ 303,602
Hearing Impairment	4	£ 23,593	5	£ 71,883
Moderate Learning Difficulty	9	£ 78,864	7	£ 86,830
Other Difficulty/Disability	10	£ 93,815	2	£ 56,810
Physical Disability	13	£ 111,620	1	£ 9,817
Profound & Multiple Learning Difficulty	8	£ 104,043	1	£ 27,550
Severe Learning Difficulty	2	£ 14,585	1	£ 9,880
Social, Emotional and Mental Health	16	£ 247,050	13	£ 263,600
Specific Learning Difficulty	1		1	£ 17,100
Speech, Language and Communications Needs	16	£ 139,867	18	£ 195,637
TBC	1	£ 3,945	2	£ 41,325
Visual Impairment	2	£ 15,675	2	£ 22,814
<b>Grand Total</b>	<b>105</b>	<b>£ 1,142,982</b>	<b>74</b>	<b>£ 1,106,847</b>

Chart 12: Number of service users (8 years old and over), by SEN Category



# Modelling the impact of direct payments

## Exploring the pilot scheme

In 2019/20, the Children's department are planning to undertake a pilot of SEN Personal Travel Budgets (PTBs) as, although there has been capacity in the past to offer this as a transport solution under the current policy, there has been limited take up. The children's commissioning have proposed that the PTBs are calculated on the straight-line distance between home and school for the days that the child attends school as outlined below. This means each PTB will be tailored to the specific needs of each family.

### Proposed bandings:

- Less than 5 miles: annual budget = £2,000
- 5-10 miles: annual budget = £3,000
- Over 10 miles: annual budget = £5,000

The value of conducting the segmentation exercise and refining the supporting data are highlighted clearly in activities such as this. The dynamic nature of the data used, and the number of variables included make for traditional methods to estimate the potential impact of transitioning to PTBs. With the revised dataset, the Council can quickly model the effect of implementing this revised offer and target those groups where they think they will have the most impact.

The table below highlights the budget that each of the proposed bandings would give families per school day. Chart 13 shows the number of external service users that would fall into each of these bandings and Chart 14 outlines the current spend on the external framework across each of the proposed bandings.

Proposed banding	£2,000	£3,000	£5,000
Budget per school day	£11	£16	£26

It is clear that, even modest targets, such as a 10% transition to PTBs could realise significant savings. It would be worthwhile for the Council to revisit the proposed bandings for its PTBs after the initial pilot. As the largest number of service users fall within the 'less than 5 miles' band, it could be beneficial to offer a slightly higher budget, in order to attract a greater number of service users.

Chart 13: Number of service users by proposed banding

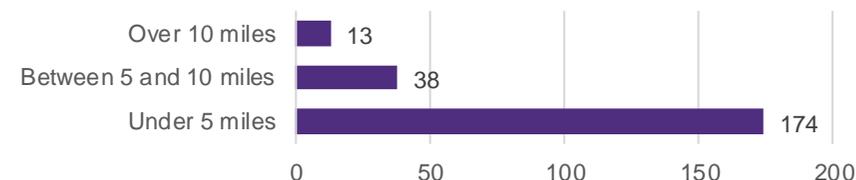
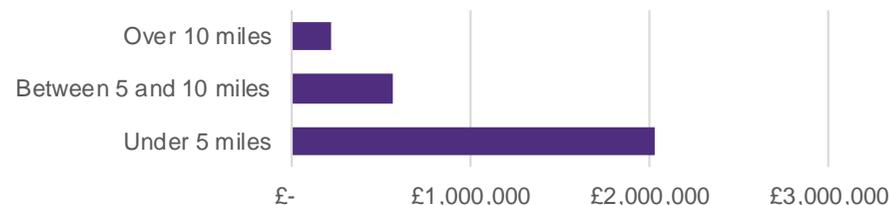


Chart 14: Current spend by proposed banding



	Current expenditure	Future expenditure at 100% PTBs	Future expenditure at 25% PTBs	Future expenditure at 10% PTBs
Under 5 miles	£2,031,977	£348,000	£87,000	£4,800
Between 5 and 10 miles	£566,643	£114,000	£28,500	£11,400
Over 10 miles	£226,860	£65,000	£16,250	£6,500
<b>Possible saving</b>		<b>£2,298,480</b>	<b>£574,620</b>	<b>£229,848</b>

# Emerging guidance on direct payments

## Exploring the pilot scheme

In the current Government guidance on Home to school travel and transport for children of compulsory school age, which is currently out for consultation, the following guidance is given on Personal Transport Budgets and Mileage Allowances:

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- Where a parent has agreed to receive a personal transport budget or mileage allowance, it is for the local authority to determine how to administer this. Local authorities may require parents to provide copies of receipts and other supporting documentation.
- Monthly payments made by the local authority, to reimburse the cost incurred by a parent in providing a child's home to school transport on behalf of the local authority, will not be taken into account in a Universal Credit (UC) assessment.
- Any additional payments, e.g. to cover unexpected expenses relating to a child's home to school transport, may also be reimbursed, by the local authority. Such ad hoc payments to cover additional expenditure would be treated as capital in the UC assessment and the usual UC capital rules would apply.
- Payments provided in this way should not give rise to tax liability, but it is the responsibility of individuals to satisfy themselves that they meet HMRC's requirements. Guidance on tax liability can be found in the Employment Income Manual, EIM71100, on the government website [www.gov.uk](http://www.gov.uk).
- Local authorities must ensure that the travel arrangements they make take account of the needs of the child concerned. For example, it would not be appropriate to provide a pass for free travel on a service bus to a child whose special needs meant they would be unable to travel on a service bus.

# Emerging guidance on developing a suitable travel policy

In the current Government guidance on Home to school travel and transport for children of compulsory school age, which is currently out for consultation, the following guidance is given to local authorities wanting to review their transport policies:

A local authority home to school travel policy must contain a number of elements to be considered lawful. There are also a number of elements that a local authority home to school travel policy should include to ensure it is clear and easy for parents to understand. A list of the main elements is below, however, it is not an exhaustive list and authorities are free to add elements they consider necessary, provided they are lawful.

Local authorities may wish to use the list to help ensure their current policy is lawful, to support a review of their current policy, or to support the drafting of a revised policy.

- ✓ The policy includes a clear introduction explaining what the reader can expect to learn from the document.
- ✓ The policy clearly explains all four categories of eligible children (statutory walking distances; special educational needs, disability and mobility problems; unsafe walking routes and extended rights).
- ✓ Where a local authority has a separate policy document for a category of eligibility (for example, special educational needs) they should refer to this within the main policy document so parents may easily understand all the categories of eligibility.
- ✓ The policy includes information on how a parent can apply for home to school travel support.
- ✓ The policy clearly explains the terms that will enable a parent to understand whether their child is eligible for home to school travel support. This includes terms such as 'home address' and 'nearest suitable school'.
- ✓ The policy clearly explains how a child's eligibility will be assessed. This includes how distances will be measured and how route safety is assessed.
- ✓ The policy clearly explains that the eligibility of children with special educational needs, a disability or mobility problems will be assessed on an individual basis.

- ✓ The policy clearly explains the ways in which travel assistance is provided, for example, passes for public service buses, dedicated school buses, taxis.
- ✓ The policy clearly explains the circumstances in which it will consider providing home to school travel support on a discretionary basis. Where an authority has an automatic entitlement to discretionary travel for groups of children (such as long standing arrangements for catchment areas), this is clear in their policy.
- ✓ The policy clearly explains any other arrangements that are in place for children who are not eligible for free home to school travel, such as concessionary schemes. It may also be helpful to include information about any other sources of support or services a child may benefit from in terms of travel, such as relevant services offered by local bus service operators.
- ✓ The policy clearly explains how a parent may appeal the local authority's decision in response to their application for home to school travel support.

# Recommendations

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# Next steps and actions: SEND customer segmentation

## SEND Transport

- It is important for the council to review the transport provided to cohorts where their disability is less likely to impact their ability to walk to school.
- Using children with a hearing impairment as an example, there are four children over eight and four children under eight currently receiving transport assistance. Across these eight children, the Council is spending £45,310 per year on private taxis.
- The council should again challenge itself by asking whether children currently in receipt of travel assistance can reasonably be expected to walk to school, in the context of their special educational needs or disability, with or without additional training or support?
- In undertaking a methodical reassessment programme, the council can identify whether there is reasonable justification for the provision of service;
- Equally, the council should address what provision it will be providing in the future for discretionary cohorts, for example, no school age children.
- It is clear that, even modest targets, such as a 10% transition to PTBs could realise significant savings.
- It would be worthwhile for the council to revisit the proposed bandings for its PTBs after the initial pilot. As the largest number of service users fall within the 'less than 5 miles' band, it could be beneficial to offer a slightly higher budget, in order to attract a greater number of service users.

# Understanding the drivers for rising demand and associated costs for home-to-school transport

BETH SWORDS, NATALIE PARISH AND KARINA KULAWIK



# Understanding the drivers for rising demand and associated costs for home-to-school transport

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## Executive Summary

1. The purpose of this research, commissioned by the Local Government Association in May 2019 and supported by the County Councils Network, is to understand the drivers of increased pressures on home-to-school transport budgets; how councils seek to bring budgets under control; and what they need to support them to do this. We have also used evidence from our survey, fieldwork and national data to project forward possible demand and expenditure for home-to-school transport over the next five years.
2. Between 2014-15 and 2017-18 the total national spend on home-to-school transport has increased from £1.02 billion in 2014-15 to £1.08 billion in 2017-18 – an overall increase of 6.5%. The percentage of councils that are overspending their home to school transport budgets has consequently increased from 71% to 83%. The total national deficit on home to school transport now stands at £111 million<sup>1</sup>.
3. Increasing expenditure is being driven by the costs of providing transport for children with SEND. Expenditure on transport for children with SEND has increased by 13% for pre-16 children and by 68% for post-16. This is in comparison with a drop of 12% in spend on pre-16 mainstream transport and a drop of 27% in spend on post-16 mainstream transport. Transport for children and young people with SEND now accounts for 69% of all home-to-school transport expenditure<sup>2</sup>.
4. In comparison with expenditure, the total number of children receiving home-to-school transport actually appears to have fallen slightly over recent years. We can estimate, projecting from responses to our survey, that around 550,000 children and young people are currently receiving home-to-school transport for pre-16 SEND and mainstream, and post-16 SEND.<sup>3</sup> The net reduction masks an increasing trend in the number of children with SEND receiving transport compared with a reducing trend in mainstream transport.
5. There is very significant variation between local authorities on the amount that they spend per head of population on home-to-school transport and the percentage of children eligible for transport. The most significant factor underpinning these variations in expenditure is the size and rurality of different areas. Responses to our survey show that rural areas are transporting proportionally more children and young people for further distances than predominantly urban authorities. Our survey data also shows that for every type of pupil eligible for home-to-school transport (pre and post-16, SEND and mainstream) rural areas spend more per head than either their urban counterparts or the national average<sup>4</sup>.
6. Although both the numbers of children in mainstream home-to-school transport and expenditure on mainstream transport are falling, it would be misleading to conclude that demand for mainstream home-to-school transport is simply declining or that the cost of providing it is reducing without effort. In fact our research suggests that local authorities are experiencing a range of pressures which have the potential to drive up numbers of children eligible for

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<sup>1</sup> Based on analysis of Section 251: Budget and Outturn for 2017-18

<sup>2</sup> As above

<sup>3</sup> Isos Partnership survey – insufficient data was provided for post-16 mainstream numbers to determine a total number representative of the population

<sup>4</sup> As above

mainstream home-to-school transport which, thus far, they have managed to offset by reducing their local offer to, or close to, the statutory minimum.

7. The pressures experienced by local authorities, which can all serve to increase the number of children potentially eligible for mainstream home-to-school transport, include underlying population growth, new housing developments, increasing numbers of families in temporary housing, increasing numbers of looked after children, and the changing landscape of schools (in particular the closure of small schools). Many local authorities have managed these pressures by reducing their local eligibility criteria for home-to-school transport towards the statutory minimum. These decisions have been difficult to make and are often politically unpopular, but are borne from financial necessity.
8. Local authorities have also experienced a range of market pressures affecting the cost of providing mainstream home-to-school transport. These include commercial providers ceasing to offer public transport routes which are no longer profitable; commercial providers stopping trading reducing the pool of providers with whom local authorities can contract; minimum wage increases; and higher fuel costs. Local authorities are addressing these inflationary pressures through smarter commissioning with attention to both cost and quality, strategic reviews of routes and sharper income generation from unused capacity on buses.
9. The picture for SEND home-to-school transport is very different to that for mainstream transport. For SEND we have seen a significant rise in both the numbers of children in receipt of transport and the associated costs of providing that transport year on year. The growth in the number children with EHCPs is undoubtedly an important factor in increasing demand for SEND transport. Local authorities with low rates of children and young people with EHCPs are providing SEND transport to 25% fewer pupils per 10,000 population than those with high rates of EHCPs.<sup>5</sup>
10. The increasing complexity of needs of children with SEND was the second factor identified by local authorities in contributing to growing expenditure on SEND transport. This was particularly acute for two groups. Increasing numbers of children with complex medical needs or profound and multiple disabilities was creating demand for more costly forms of transport, for example specially equipped buses, and more skilled passenger assistants who could provide medical support in an emergency. At the same time, increasing numbers of children presenting with extremely challenging behaviour was leading to greater use of individual taxi journeys for this cohort.
11. The final factor that local authorities described is the fact that an increasing percentage of children with EHCPs are being educated in special schools and when local special schools become full, the 'nearest suitable school' is necessarily further afield. There appears to be a clear relationship between available capacity in special schools and spend on home-to-school transport. For local authorities which place many more pupils in special schools than the number of places they formally commission, the average spend per child or young person in receipt of SEND transport<sup>6</sup> is almost double that found in local authorities in which the number of commissioned places<sup>7</sup> is much closer to the actual number of children in special schools.<sup>8</sup>
12. Local authorities which have been most successful in containing the rising expenditure for home-to-school transport for children with SEND have taken a very strategic approach to commissioning

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<sup>5</sup> Statements of SEN and EHC plans, England, 2018 and Section 251: Outturn, 2017-18

<sup>6</sup> Isos Partnership Survey

<sup>7</sup> High needs: place allocations for 2017-2018

<sup>8</sup> Schools, pupils and their characteristics: January 2018

and provision of home-to-school transport; placed the long-term needs of the child at the heart of their strategy; have been disciplined in the execution of their stated policy and imaginative in coming up with creative options. Actions that help to mitigate cost pressures for SEND transport include taking a strong strategic approach to SEND and inclusion; establishing clear leadership of SEND transport planning and joining-up across teams; developing a menu of travel assistance options, skilfully facilitated with parents and schools; and working in partnership with schools and across services.

13. However, the research also identified clear limitations in what local authorities could do to reduce expenditure on home-to-school transport. Firstly, all the growth in home-to-school transport expenditure is being driven by increases in SEND transport. Without action to address the national policy and funding levers which are contributing to the rapid rise in children with EHCPs, local authorities have little opportunity to contain spending on SEND transport.
14. Furthermore, there is an unresolved tension at the heart of home-to-school transport policy between the responsibilities of parents in getting their children to school versus the expectations of parents in the level and type of assistance that local authorities can provide. There have been a number of high-profile judicial reviews which have found in favour of parents where local authorities have tried to reduce transport entitlements. In a similar vein, some of the local authorities engaged in our fieldwork highlighted examples of reforms and cost reductions that they had attempted to introduce but had relinquished in light of strong parental opposition.
15. In addition to these common pressures, rural local authorities as a result of longer distances, lower population densities, limited public transport networks and more sparsely distributed schools bear a disproportionate financial burden both in terms of the relative number of children and young people who are eligible for transport and in the cost per head of making transport available.
16. Finally, mainstream home-to-school transport is stable for now and reductions in this area have helped to offset the increased spend elsewhere. However, this position cannot be expected to last indefinitely. Survey and fieldwork evidence suggest that many local authorities are now at or close to the statutory minimums for mainstream transport provision and the market may not sustain ever-greater efficiencies driven through commissioning.
17. Looking ahead, we estimate that in five years' time expenditure on home-to-school transport might reach £1.2 billion. This is considerably more than is spent nationally on youth services, family support services or children's centres. It is therefore the conclusion of this research that, in the current funding context, continuing to provide home-to-school transport in the way it is currently delivered may not be financially sustainable. We have therefore suggested the following recommendations for consideration:

Local authorities, working with the Local Government Association and County Councils Network, should:

- Strongly promote the aspiration that children with SEND, wherever possible, should be educated successfully in their local school, and put in place the support for children, parents and schools to make that achievable.
- Establish clear strategic leadership across the multiple teams that contribute to SEND transport to ensure that placement and transport decisions are made together and that maximum value is achieved across combined budgets.

- Create the opportunities for a creative and mature dialogue with parents about transport options, with a presumption towards modes of transport that promote independence and reduce reliance on government-provided options.
- Find opportunities to share good practice in terms of decision-making and transport assessments, co-production of policies and guidance with parents, and creating a full and creative range of support options for travel to school.

#### National government should consider:

- Urgently reviewing the multiple policy and funding drivers which are contributing to the rapid rise in the number of children with EHCPs.
- Clarifying aspects of the home-to-school transport guidance which are ambiguous and contentious. Two key areas for greater clarity include transport responsibilities for children below statutory school age with a named provision on their EHCP and for post-16 provision. For post-16 guidance, if national government intends to continue to encourage post-16 transport policies to be set at local authority discretion, this level of discretion needs to be made consistent throughout the guidance and requires clarification across the different groups mentioned.
- Reflecting the disproportionate weight of expenditure on home to school transport borne by large rural local authorities in future local government funding arrangements.
- Fundamentally reconsidering the balance of parental and government responsibilities in providing transport to school. One option that might be considered would be to view home-to-school transport as a means-tested benefit rather than a universal entitlement for children who meet certain criteria. Under such a scheme, parents who have sufficient income could pay a pre-defined contribution towards the cost of locally provided transport or alternatively choose to make their own arrangements.

## Introduction

Home-to-school transport is a complex area of local authority statutory responsibility which involves teams across admissions, special educational needs, transport, procurement and commissioning. It is also an area which in recent years has come under significant financial pressure as a number of policy, demographic and market forces have led to rapidly growing expenditure, particularly in the transport provided for children and young people with SEND. This research project seeks to understand the range of factors that have come together to drive demand and spend over the past five years, and what local authorities have done to mitigate some of these challenges. It also will consider how demand might evolve going forward and how local authorities can be better supported in provision of home to school transport arrangements.

## Purpose of the research and methodology

In May 2019, Isos Partnership was commissioned by the Local Government Association (LGA), with the support of the County Councils Network (CCN), to carry out research to better understand the factors driving demand and spend on home-to-school transport, across SEND and mainstream provision, from 0-25 years old. Specifically, we were asked to:

- 1) To provide an analysis of what councils are spending on home-to-school transport, and what they are likely to spend in the future if current patterns of expenditure continue;
- 2) Develop a deeper understanding of the factors influencing the need to spend on home-to-school transport;
- 3) Identify the actions that local authorities are taking to decrease pressure on home-to-school transport budgets; and
- 4) Make recommendations for what local or national government might do differently to meet the transport needs of pupils in a more cost-effective way.

Through this project, we have looked at whether pressures on home-to-school transport budgets vary by characteristics of local authorities, including rurality, region, and population density. We have also brought together the data analysis, survey analysis and softer intelligence to provide a rough estimate of how demand and spend might be projected forward for the next five years.

An important question for the research has been to explore whether current guidance and statutory responsibilities in relation to home-to-school transport are still fit for purpose in the context in which local authorities are now operating. Current guidance is largely based on the Education Act from 1996 but the context in which local authorities are now operating is very different: pressures on high needs budgets are acute; local authorities have a diminishing direct role in providing schools; there is greater devolution of funding responsibilities to schools; and there is an increasing diversity of school types and parental choice driving different patterns of travel to school.

We carried out the research in three phases. Initially, we conducted a scoping exercise of existing publications, data and research relating to demands on home-to-school transport provision, to draw out key themes and identify datasets already available on the subject. As part of this scoping exercise, we assessed literature from the perspectives of both local authorities and service users. We considered the County Councils Network research into home-to-school transport (2018)<sup>9</sup>, the

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<sup>9</sup> County Councils Network, 'Home to school transport in county areas', (2016)  
<https://www.countycouncilsnetwork.org.uk/counties-warn-it-is-increasingly-difficult-to-subsidise-free-home-to-school-transport-due-to-rural-premium-on-delivering-services/>

Association of Directors of Children's Services national research (2016)<sup>10</sup>, the Campaign for Better Transport report on school transport (2016)<sup>11</sup>, the inquiry by the charity Contact into school transport for disabled children (2017)<sup>12</sup>, 'Home-to-school transport in contemporary schooling contexts' (2017) by University of Plymouth<sup>13</sup> and the research project on home-to-school transport by University of Leeds (2017)<sup>14</sup>. With regards to published data, we analysed budgets and expenditure reported in Section 251 returns since 2014.

Secondly, we constructed an online survey that was sent to all local authorities in England. It requested information on trends in numbers in receipt of home-to-school transport and average prices, arranged by eligibility criteria and package type, as well as questions around future challenges. We received 45 responses to the survey. We have further supplemented this survey with data shared with us by the Association of Transport Coordinating Offices (ATCO). The data generously provided to us dates back to 2015 and comes from a survey collected annually from all member local authorities. Since 2015, they have had a range of 43 to 51 respondents.

Thirdly, we carried out fieldwork visits to eight local authorities, where we spoke to Lead Members, Directors of Children's Services, Directors of Transport, Directors of Finance, and team leaders from Transport and SEN Departments. The purpose of the fieldwork was to unpack the key drivers in increased spend; how these challenges might change going forward; and how authorities seek to mitigate these challenges. To ensure a representative sample of local authorities to take part in the fieldwork we used published data to develop a sampling methodology which categorised local authorities as low, medium or high against two key variables:

- 2017-18 outturn spend per 0-19 capita on SEND and non-SEND transport
- Percentage increase in spend on SEND transport from 2012-13 to 2017-18

These two variables were chosen because we wanted to capture local authorities with a range of spending levels on home-to-school transport as well as including local authorities that had seen a large change in spend after the SEND reforms in 2014. Within the sample, we also ensured that we had a balance between urban and rural areas, large shires and smaller metropolitan boroughs and unitary authorities, geographical distribution, deprivation and percentage of EHCPs.

We are very grateful to the time and commitment to the research to all those who completed the survey and, in particular, to our eight fieldwork local authorities. These were Bristol, Islington, Hampshire, Lancashire, Leeds, Norfolk, North Yorkshire and Waltham Forest. We would also like to extend our thanks to our associate, Karina Kulawik, for her help and support with this research.

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<sup>10</sup> ADCS, 'Home to School Transport Position Statement and Cost Analysis', (2016),

<https://adcs.org.uk/funding/article/home-to-school-transport-position-statement-and-cost-analysis>

<sup>11</sup> Campaign for Better Transport, 'School Transport Matters', (2016),

<https://bettertransport.org.uk/sites/default/files/research-files/16.05.25.school-transport-matters.pdf>

<sup>12</sup> Contact a Family, 'Inquiry into school transport for disabled children', (2017),

[https://contact.org.uk/media/1144250/school\\_transport\\_8\\_september\\_2017.pdf](https://contact.org.uk/media/1144250/school_transport_8_september_2017.pdf)

<sup>13</sup> C. Gristy, University of Plymouth, 'Home-to-school transport in contemporary schooling contexts: an irony in motion', (2017)

<sup>14</sup> Cerebra and School of Law, University of Leeds, 'Local Authority Home to School Online Transport Policies: Accessibility and Accuracy', (2017)

## The legislative underpinning for home-to-school transport

The provision of home-to-school transport is based on two sets of statutory guidance, one of which relates to school-age pupils<sup>15</sup> and one for 16-25 year olds.<sup>16</sup> The guidance for school age pupils is based on broad eligibility criteria, last reviewed in 2014, but originating from legislation in 1996. The guidance for the post-16 group was updated more recently in January 2019.

Provision of home-to-school transport for school-age pupils is based around age, special educational needs, distance criteria and additional extended rights based on free school meals and working tax credits. The local authority is expected to write a transport policy using discretion to interpret the eligibility of children beyond the statutory minimum. According to Schedule 35B of the Act, local authorities are required to:

- Provide free transport if a child is below 8 years old and is attending their nearest suitable school which is beyond a walking distance of 2 miles.
- Provide free transport if a child is aged between 8 to 16 and attends their nearest suitable school which is beyond a walking distance of 3 miles.
- Make transport arrangements if a child attends their nearest suitable school and cannot be reasonably expected to walk because the nature of the route is unsafe.
- Make transport arrangements if a child attends their nearest suitable school and cannot be reasonably expected to walk because of their special educational needs, disability or mobility problems.
- Provide free transport if a child is entitled to free school meals, or their parents are in receipt of maximum Working Tax Credit, and:
  - o they attend their nearest suitable school and it is beyond 2 miles from their home (and the child is aged between 8 and 11)
  - o they attend one of their three nearest suitable schools and it is between 2 and 6 miles from their home (and the child is aged 11 to 16)
  - o they attend a school that is between 2 and 15 miles of their home if their parents have chosen it on the grounds of their religion or belief, and having regard to that religion or belief, there is no nearer suitable school (and the child is aged 11 to 16)

The statutory guidance for post-16 transport is more open to local authority discretion. The national guidance refers to two main groups – adult learners and young adults – that are linked to the age groups 16-19 and 19-25, with and without EHCPs. Within these age groups, a distinction is made for young people who are either continuing a course that was started before their 19<sup>th</sup> birthday or for those that started a course after their 19<sup>th</sup> birthday. The guidance is split between an explanation of the eligibility criteria for these groups and the ability of a local authority to charge individuals for use of transport. There is wide-ranging discretion for a local authority to produce their own transport policies, but whatever they decide are their thresholds, these have to be easily accessible in their post-16 transport policies, published on the local offer. Overall, eligibility to transport arrangements across these groups is up to the local authority but underpinning their decisions must be the duty to ensure that learners are able to access the education and training of their choice. For learners with EHCPs,

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<sup>15</sup> Department for Education, Home to school travel and transport guidance, (2014), [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/575323/Home\\_to\\_school\\_travel\\_and\\_transport\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf)

<sup>16</sup> Department for Education, Post-16 transport and travel support to education and training, (January 2019), [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/772913/Post16\\_transport\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772913/Post16_transport_guidance.pdf)

these arrangements must be reviewed when a young person moves from compulsory schooling to post-16 even if the young person remains at the same educational institution.

This guidance, across pre and post-16, is applied universally to all local authorities, regardless of local authority type, public transport availability, population density or rurality.

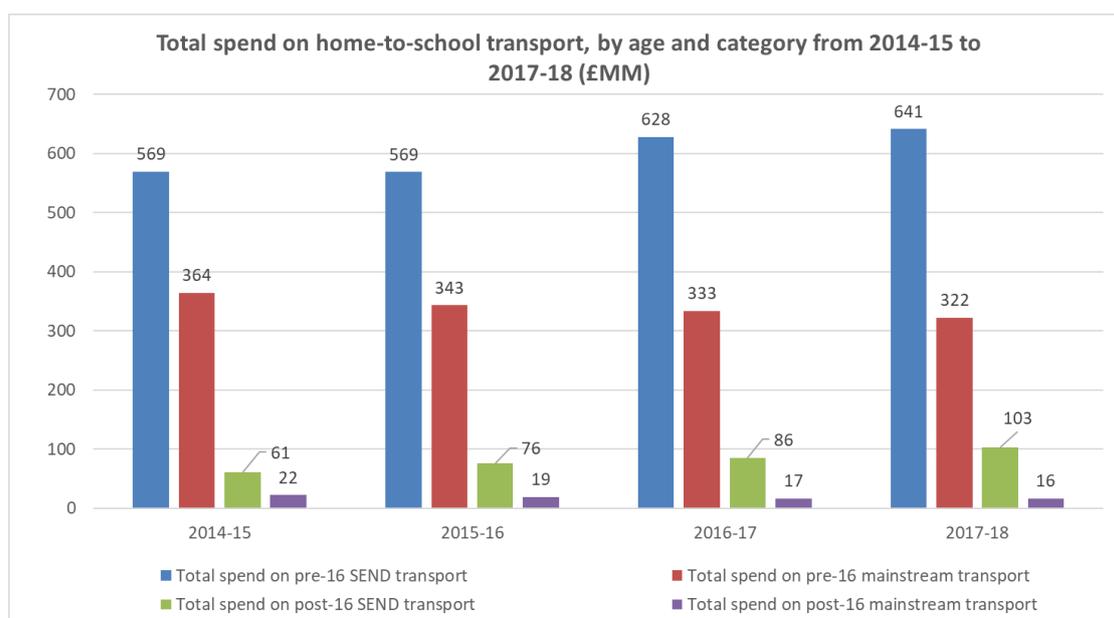
Throughout the course of this project, we have tried to unpack how different local authorities have interpreted the eligibility criteria, how interpretation and local offers have changed with increasing demand and how the universality of the guidance can create uneven pressures across the country.

## Part 1: Expenditure on and number of children in receipt of home-to-school transport

Based on an analysis of Section 251 budget and outturn statements, the total spend on home-to-school transport has increased from £1.02 billion in 2014-15 to £1.08 billion in 2017/18 – an overall increase of 6.5% (see Figure 1). However, this headline figure masks very different trends in terms of expenditure for pupils eligible for home-to-school transport on the basis of ‘mainstream’ criteria (for example distance to school) and those eligible for homes school transport on the basis of their special educational need.

Expenditure on transport for children with SEND has increased by 13% for pre-16 children and by 68% for post-16. This is in comparison with a drop of 12% in spend on pre-16 mainstream transport and a drop of 27% in spend on post-16 mainstream transport. Consequently, the percentage of expenditure on home-to-school transport for children and young people with SEND has increased from 62% in 2014-15 to 69% in 2017-18. This is in line with the ADCS ‘Survey of Local Authority Spend, 2015/16’ (2017), which outlines that in 2015/16 local authorities spent almost £1 billion on home-to-school transport and that 64% of spend, based on the local authorities that responded to their survey, was on SEND transport.

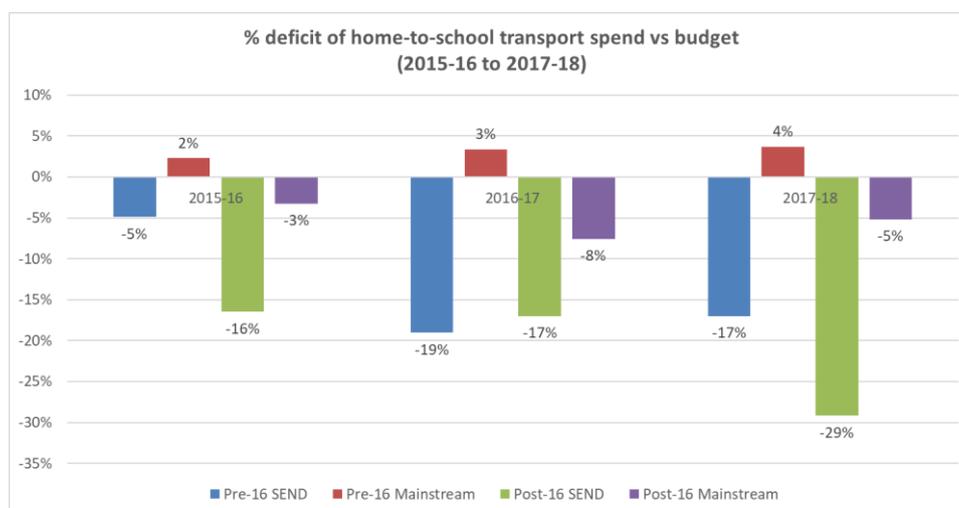
Figure 1 - Total spend on home-to-school transport from 2014-15 to 2017-18 (£MM)



The overall rising costs of home-to-school transport have had an impact on the ability of local authorities to manage within the budgets they have allocated for this area of provision. Again, an analysis of S251 budget and outturn statements from 2015-16 to 2017-18 (Figure 2) shows that the overspend, nationally, for SEND transport has considerably increased since 2015-16, with the percentage deficit for spend on pre-16 SEND transport increasing from 5% to 17%. The percentage deficit for spend on post-16 SEND transport has also increased from 16% to 29%.

For mainstream transport, there is nationally a small budget surplus for pre-16 (4%) and a moderate deficit post-16 (reducing from 8% in 2016-17 to 5% in 2017-18). Across the total home-to-school transport budget, the percentage of local authorities recording an overspend increased from 71% of local authorities in 2015-16 to 83% in 2017-18.

Figure 2 - % deficit of home-to-school transport spend vs budget (2014-15 to 2017-18)



To understand what is driving these overall trends in expenditure we need to understand the relationship between the numbers of children and young people eligible for home-to-school transport and the costs associated with transporting these children. There is no nationally published data on the number of children in receipt of home-to-school transport or unit costs of travel, so the following analysis is based on returns submitted by local authorities to our survey and to the ATCO survey.

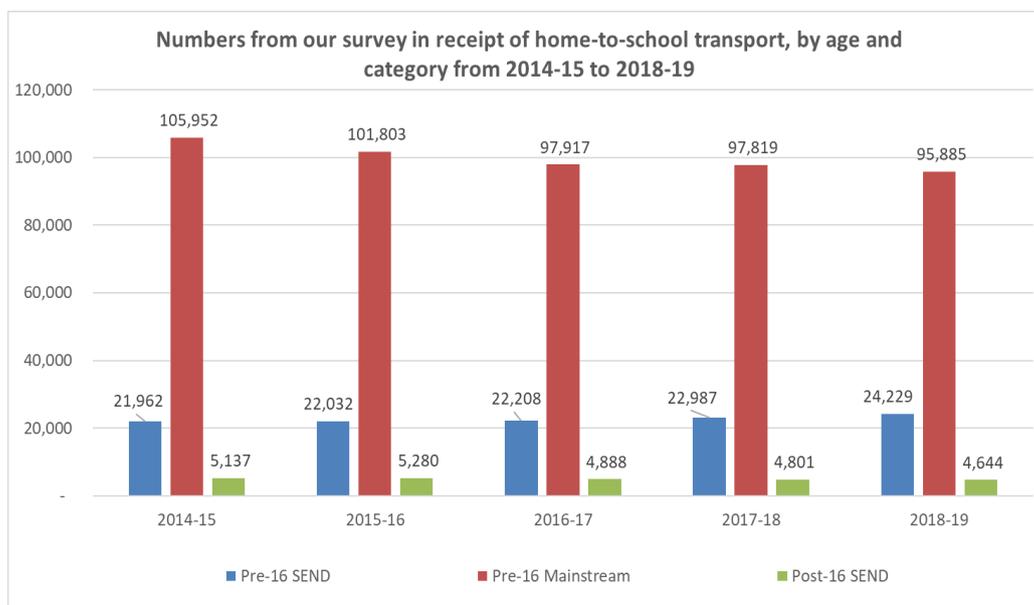
### Numbers in receipt of home-to-school transport

While overall expenditure on home-to-school transport has increased, our survey suggests that the total number of children and young people in receipt of pre-16 mainstream and all SEND home-to-school transport in the local authorities which replied to our survey has decreased from 133,051 in 2014-15 to 124,758 in 2018-19 (Figure 3). This is based on responses from 26 local authorities which provided answers for the number of children in receipt of pre-16 transport (SEND and mainstream) and post-16 SEND transport for the period between 2014-15 and 2018-19. Too few local authorities provided information on the number of young people eligible for post-16 mainstream transport so we have excluded this category from our analysis.

When taken as a percentage of the 0-25 population, total numbers in receipt of home-to-school transport (both SEND and mainstream) have gone down from 3.9% in 2015-16 to 3.2% in 2018-19 in

responding local authorities.<sup>17</sup> A similar direction of travel is exhibited in the data provided by ATCO. In the period between 2016 and 2018, numbers in receipt of mainstream transport dropped from 102,000 to 96,000 and numbers in receipt of SEND increased from 16,000 to 19,000, for the 18 local authorities that consistently responded across the period.

Figure 3 - Numbers from our survey in receipt of home-to-school transport, by age and category from 2014-15 to 2018-19

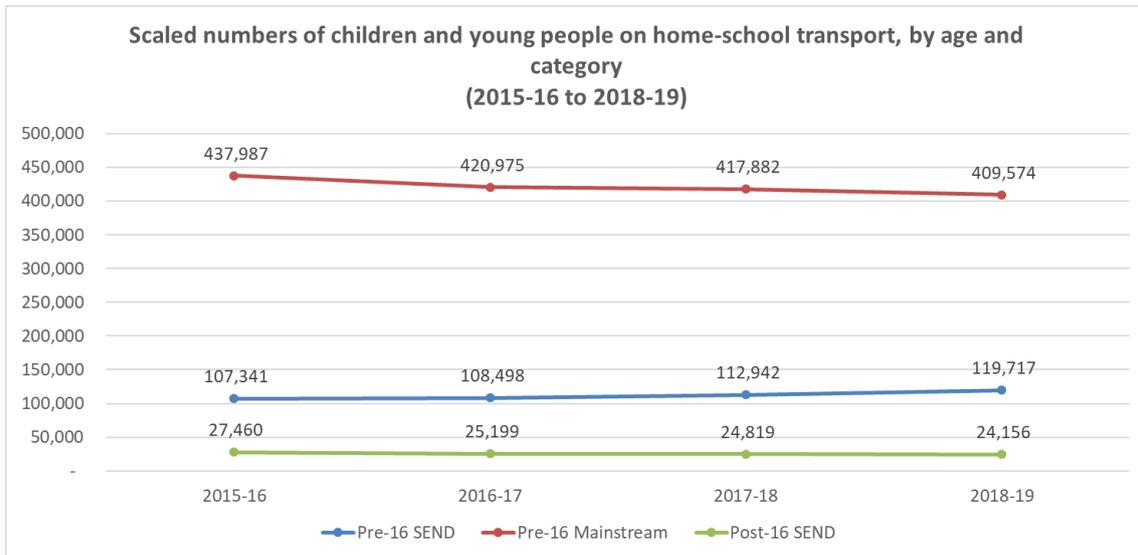


We have used the data from our survey to project the national picture. This suggests that in 2018/19 there may be around 550,00 children and young people in receipt of home-to-school transport across pre-16 SEND and mainstream and post-16 SEND, as shown in Figure 4 below:<sup>18</sup>

<sup>17</sup> This percentage is based on the total numbers in receipt of home-to-school transport in 2015-16 as a proportion of the 0-25 population represented by the local authorities who provided an answer. This represents 32 local authorities in 2015-16 and 39 in 2018-19.

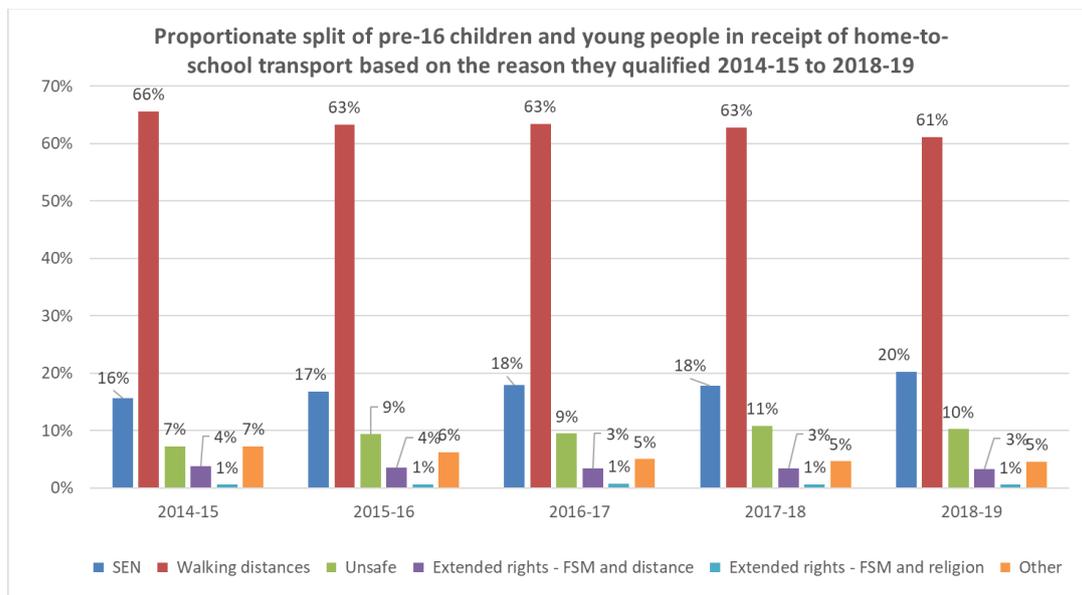
<sup>18</sup> To scale up numbers in receipt of home-to-school transport from our survey responses, we categorised local authorities by rurality and calculated numbers in receipt of transport as a proportion of the population – one proportion for rural and one for urban. We then scaled this up to national rural and urban populations and summed the final number together. We undertook this method as our sample of local authorities from the survey had a disproportionate number of rural local authorities compared to the national split.

Figure 4 - Scaled numbers of children and young people on home-to-school transport, by age and category (2015-16 to 2018-19)



It is clear that the overall reduction in the numbers of children and young people in receipt of home to school transport is being driven by falling numbers of children receiving mainstream transport and falling numbers of young people receiving post-16 SEND transport, partially offset by increasing numbers of children in receipt of pre-16 SEND transport. We are seeing a shift since 2014-15 in who is receiving support and why (see Figure 5). Based on data from our survey outlining qualifying criteria for children and young people pre-16, the percentage of children qualifying under 'walking distances' has fallen from 66% to 61% while those qualifying under SEN have increased from 16% to 20%.<sup>19</sup>

Figure 5 - Proportionate split of pre-16 children and young people in receipt of home-to-school transport based on the reason they qualified 2014-15 to 2018-19



The increasing number and percentage of children eligible for SEND transport explains why the overall expenditure on home-to-school transport is rising at a time when overall numbers are falling. In general, the average cost of providing transport for a school age child with special educational needs

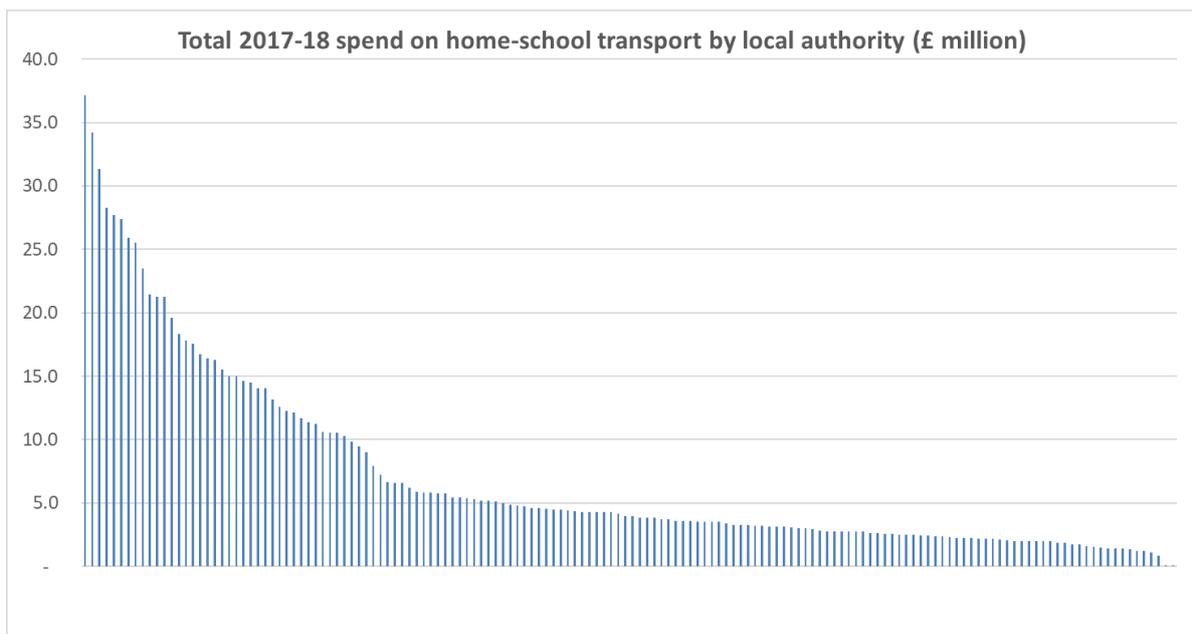
<sup>19</sup> Based on answers from all 46 local authorities that responded to our survey.

is £5,400 per year, compared with £1,200 per year for the average child eligible for mainstream transport. The effect of unit costs on expenditure are particularly acute when one considers the group of young people eligible for post-16 SEND transport. As shown in Figure 1, the expenditure on this group has increased by over £40 million in the last four years, but the number of young people post-16 with SEND in receipt of home-to-school transport has declined slightly in the same period. This points to the complexity of needs exhibited by the young people receiving transport and the high unit cost of putting in place suitable transport options. In comparison, the year on year percentage decrease in number of children and young people in receipt of mainstream transport pre-16 is largely in line with percentage decrease in spend on pre-16 mainstream transport, with a 10% and 12% drop respectively since 2014-15

### Differences between local authorities

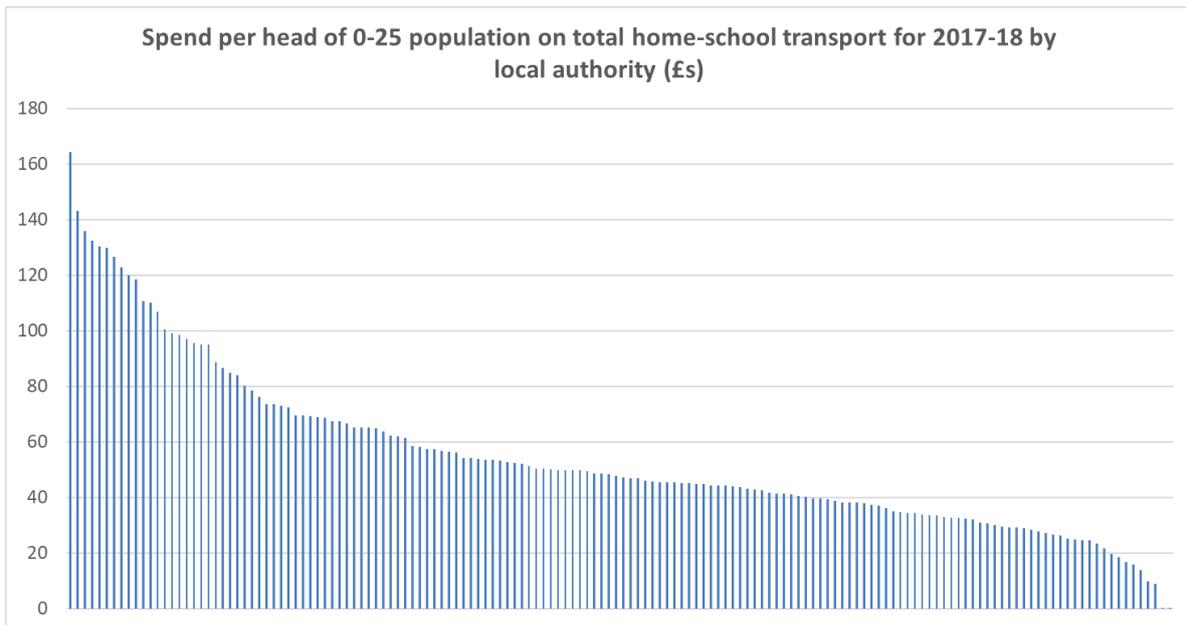
There is very significant variation between local authorities on the amount that they spend per head of population on home-to-school transport and the percentage of children eligible for transport. Figure 6 and Figure 7 below show both the total spend on home-to-school transport in 2017-18 and spend per head of population by local authority. This shows a range in total spend of £37 million, with per head figures ranging from £164 to £9.

Figure 6 - Total 2017-18 spend on home-to-school transport by local authority<sup>20</sup>



<sup>20</sup> Section 251: Outturn, 2017-18

Figure 7 - Spend per head of 0-25 population on total home-to-school transport for 2017-18, by local authority<sup>21</sup>

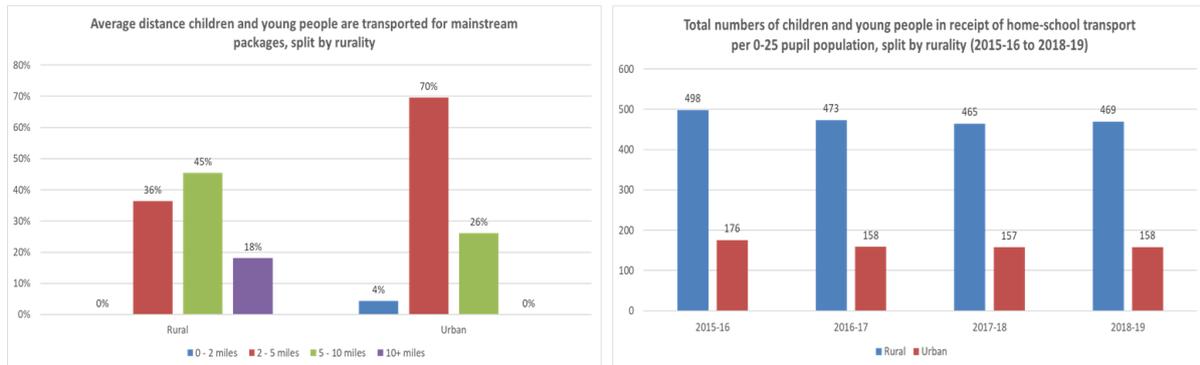


Arguably the most significant factor underpinning these variations in expenditure is the size and rurality of different areas. This was an important theme in the published literature and was echoed strongly in our fieldwork and survey. The University of Plymouth study (2017), Campaign for Better Transport Report (2016) and County Councils Network Report (2018) demonstrate that pupils in rural areas tend to travel longer distances to get to school. The County Councils Network report emphasises this point – if part of the eligibility criteria is based on pupils under 8 receiving free transport if they live 2 or more miles away from the most suitable school and likewise 3 miles for over 8 years, there will undoubtedly be higher numbers of pupils who are eligible in rural areas. The University of Plymouth study (2017) suggests that although pupils in urban areas are more likely to attend a school other than their nearest, they inevitably still tend to travel shorter distances than those in rural settings.

Analysis of Section 251 returns and responses to our survey highlight the unique pressures associated with home-to-school transport that come with being a largely rural authority. Survey responses from 34 local authorities show that rural areas are transporting proportionally more children and young people for both SEND and mainstream provision for further distances than predominantly urban authorities. This is illustrated by Figure 8 below.

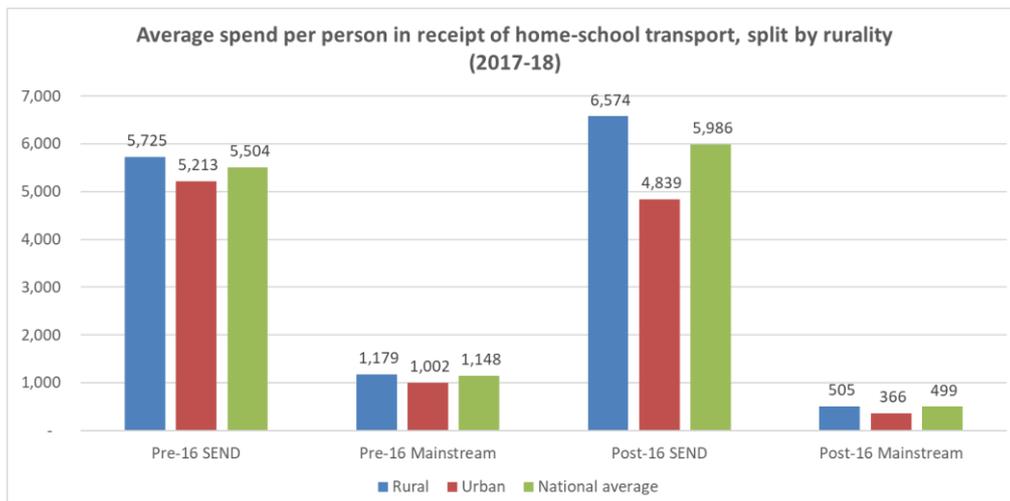
<sup>21</sup> Section 251: Outturn, 2017-18 and Section 251: Population Numbers

Figure 8 - Average distance children and young people are transported for mainstream packages, split by rural, and Total numbers of children and young people in receipt of home-school transport per 0-25 pupil population split by rurality (2015-16 to 2018-19)



Our survey data also shows that for every type of pupil eligible for home-to-school transport (pre and post-16, SEND and mainstream) rural areas spend more per head for those in receipt of home-to-school transport than either their urban counterparts or the national average (Figure 9):

Figure 9 - Average spend per person in receipt of home-school transport, split by rurality (2017-18)



A broad range of reasons underpinning these differences in eligibility and expenditure between rural and urban areas, beyond the pure impact of size and population density, are explained in the following sections relating to demand for mainstream and SEND transport.

The other, perhaps more unexpected, difference between local authorities' spending patterns to emerge from an analysis of the data was the high spend per child with SEND in receipt of home-to-school transport in London, compared with other areas. This is illustrated in Figure 10 and Figure 11 below which shows that expenditure per child in London for both pre-16 and post-16 SEND transport was very high and that this was also reflected in higher than average unit costs for different forms of transport.

Figure 10 - Average spend per head in receipt of home-school transport, split by local authority type (£, 2017-18)

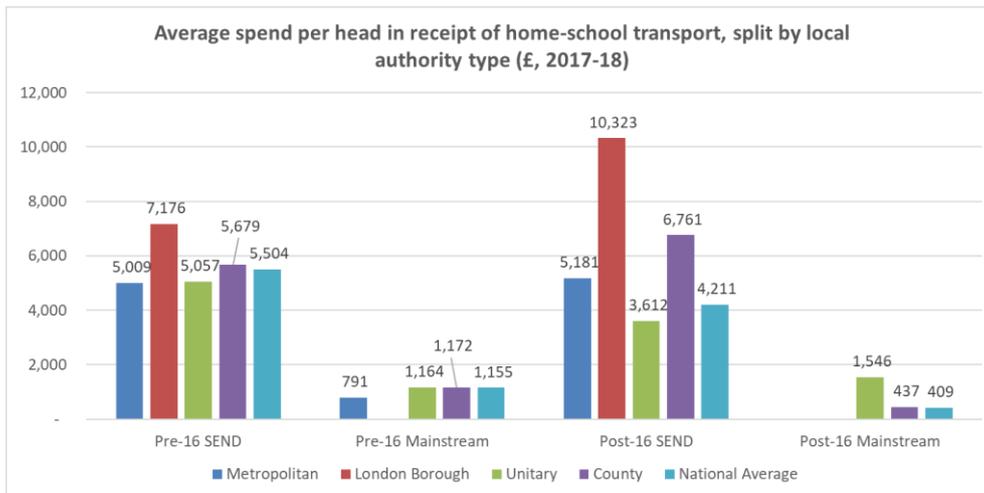
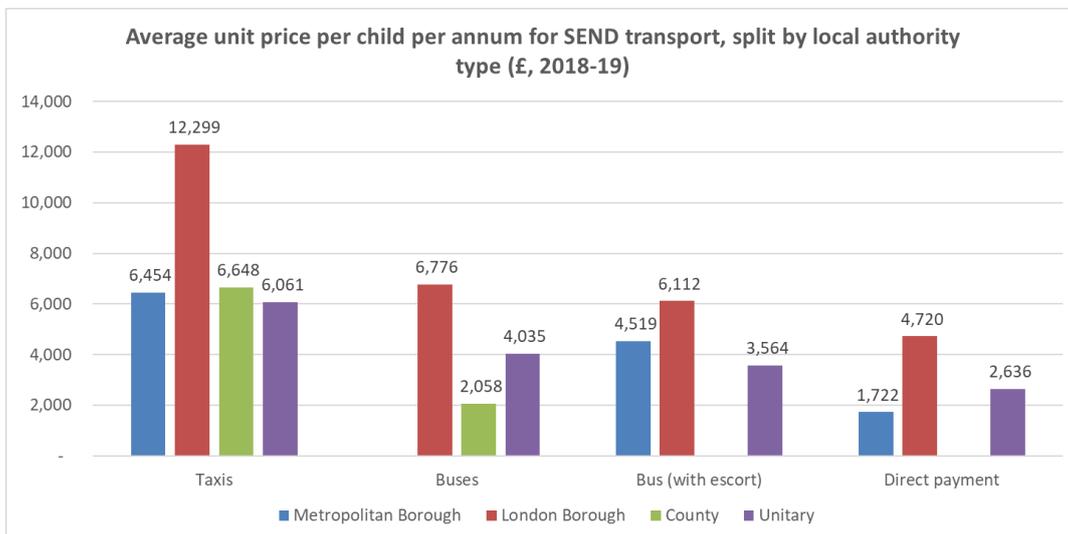


Figure 11 - Average unit price per child per annum for SEND transport, split by local authority type (£, 2018-19)<sup>22</sup>



These figures need to be treated with a significant degree of caution as we only received responses on unit costs from four London boroughs so the sample is small and may be skewed. Nonetheless, our fieldwork yielded some plausible explanations that might shed light on this variation. One issue is the distinct nature of mainstream and SEND transport in London Boroughs. Since Transport for London subsidises all pre-16 mainstream transport, SEND home-to-school transport becomes a discrete entity and where other local authorities might be able to merge mainstream and home-to-school transport provision, either by bundling contracts or by sharing actual vehicles for SEND and mainstream students alike, London authorities are less flexible in their ability to blend commissioning across provision types thereby increasing unit costs for SEND transport. The second factor is that London Boroughs have the lowest number of children and young people receiving SEND transport per head of population out of all local authority types. This no doubt reflects the excellent availability of public transport which makes it easier for young people with mild to moderate SEND to travel independently or with limited assistance. Those for whom transport is provided, therefore, are likely to be those with the most complex needs and hence the highest unit costs. Thirdly the basic cost of procuring taxis or specialist

<sup>22</sup> Chart excludes categories for which fewer than 3 local authorities provided both numbers of children in receipt and average unit costs in 2018-19.

buses is likely to be higher in London than elsewhere. Finally, local authorities in London have pointed to the impact of contextual safeguarding issues in relation to home-to-school transport, with increasing numbers of young people for whom transport arrangements are being designed to prevent certain young people going to the same schools or in the same vehicles as risks around gang activity and potential criminal exploitation become more widespread.

This brief analysis of the available data shows that the number of children receiving mainstream home-to-school transport and expenditure for this type of transport have decreased in tandem over the last five years. At the same time demand for SEND transport and the associated costs have risen sharply. The net impact is that overall expenditure on home-to-school transport has risen by £66 million nationally. To put this in perspective, expenditure on home-to-school transport now equates to 25% of total expenditure on high needs or 15% of total expenditure on children's social care. The data also shows some significant variations between local authorities in their levels of expenditure, with the higher costs of providing transport in rural areas being particularly pronounced. The following sections attempt to explain these trends in greater detail through a more forensic analysis of the factors influencing both mainstream and SEND home-to-school transport.

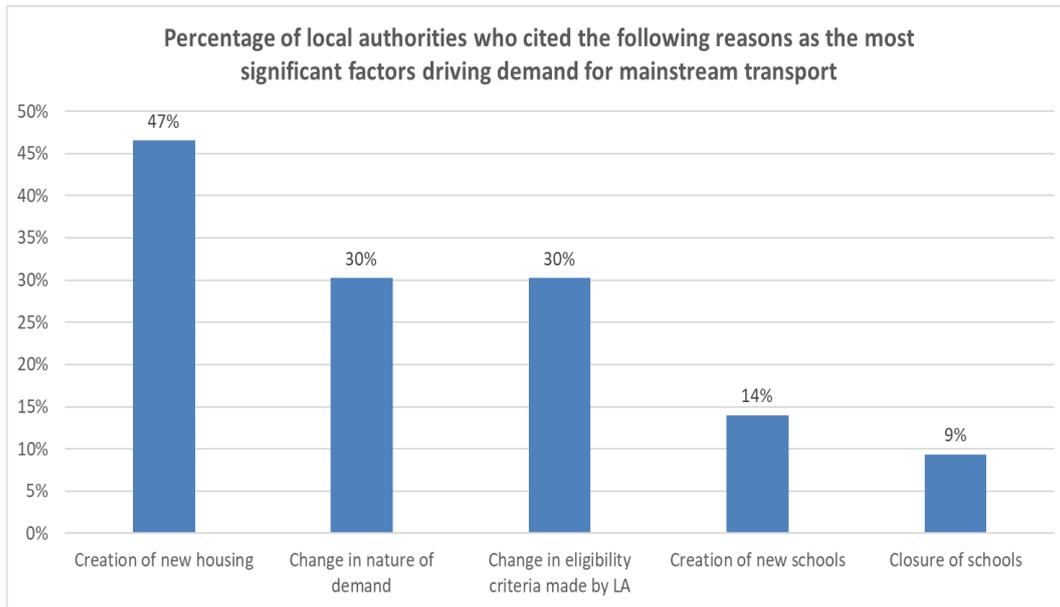
## Part 2: Explaining the underlying factors influencing mainstream home-to-school transport

Our national projection, based on our survey, suggests that the number of children receiving pre-16 mainstream home-to-school transport has reduced by around 6% in the last 5 years. Furthermore, national expenditure on both pre and post-16 mainstream transport has declined since 2014-15. The majority of our fieldwork local authorities described the area of mainstream home-to-school transport being 'broadly stable' overall. However, it would be misleading to conclude that eligibility for home-to-school transport is simply static or declining or that the cost of providing it is reducing without effort. In fact, our fieldwork and survey suggest that local authorities are experiencing a range of pressures which have the potential to drive up numbers of children eligible for mainstream home-to-school transport which, thus far, they have managed to offset by reducing their local offer to, or close to, the statutory minimum.

### Factors affecting the number of children eligible for and receiving mainstream transport

As part of our survey we asked local authorities to reflect on the factors which had affected demand for mainstream home-to-school transport in recent years either positively or negatively. Figure 12 below summarises their responses:

Figure 12 - Percentage of local authorities who cited the following reasons as the most significant factors driving demand for mainstream transport



In the following sections we use the fieldwork evidence that we collected in eight contrasting authorities, as well as evidence from our survey, to help explain the factors which shed light on the number of children receiving mainstream home-to-school transport, and the work that local authorities have done to mitigate and reduce demand pressures in this area. The issues identified include population growth, housing, the changing landscape of schools, and the changing characteristics of the underlying population.

### Population growth

Between 2014 and 2019 the number of 5 to 16-year-olds educated in maintained schools in England has grown by 485,000 (around 6%).<sup>23</sup> This automatically creates a larger pool of pupils who might be eligible for home-to-school transport. However, population growth is not evenly distributed and, in some areas, it is a far more pressing issue than in others. In one of our fieldwork areas, for example, the total number of children educated in the local authority had increased by 11,500 (10%) between 2014 and 2019.

Some fieldwork local authorities also pointed to a growth in in-year movement of pupils as a key pressure on mainstream transport. The Office for National Statistics cited that net international migration into England in mid-2018 was 275,000, which was 6,000 higher than the average for the past five years and 45,000 higher than last year.<sup>24</sup> Many of these will be families, arriving at different times of the year. When families move into an area halfway through the year, their nearest, local school can often be full and this can therefore result in more children being placed at schools further from their home. This increases the possibility that they qualify for home-to-school transport under walking distance or unsafe routes criteria.

<sup>23</sup> Schools, Pupils and Their Characteristics, January 2014 and January 2019

<sup>24</sup> Office for National Statistics, Population Estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2018, (June 2019),

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2018>

## Housing

Population growth has also led to an increase in housing developments, which pose their own unique challenges to local authorities providing home-to-school transport. It is telling that around half the local authorities which responded to our survey cited new housing as a factor contributing to changing demand for home-to-school transport. After a period of limited building between 2010 and 2014, England has recently seen a large uptake in the number of new housing developments, dominated by private enterprise. Since 2014, there has been a percentage increase of number of permanent dwellings being built per year by 40%, from 117,810 to 165,210.<sup>25</sup> Private enterprise developments make up 82% of these builds. Some of the areas engaged in our fieldwork described how these developments can be set up without due strategic regard for access to schooling and the consequential implications for home-to-school transport budgets. This was particularly acute in County Councils because although developers are expected to pay a community levy to contribute to either the building of new schools or transport provision to schools, some councils pointed out that this grant is often sent to district authorities whereas home-to-school transport costs are borne at County level. Some local authorities which had benefitted from significant large-scale housing developments also explained that this had created a positive environment for families to move to the area which, while being a welcome contributor to the strength of local communities, had led to increasing spend on transport.

At the other end of the spectrum, insufficiency of housing is creating a different set of pressures. The growth in families held in temporary housing for increased periods of time is also leading to increased demand for transport. According to parliamentary statistics, December 2011 marked the end of the long-term downward trend in the number of households in temporary accommodation. At the end of December 2018, it was found that 83,700 households were in temporary accommodation, which includes 124,490 children.<sup>26</sup> When families are housed within a commutable distance every effort is made to ensure that the children can attend their original school to provide continuity, but this may still be some considerable distance from their new address. The amount of time families are housed in temporary accommodation is also increasing, thus posing a real long-term problem for local authorities. This growth in transient and vulnerable populations contributes to an increasing demand for home-to-school transport in some areas.

## The changing landscape of schools

Around 14% of local authorities who responded to our survey cited the creation of new schools, for example new Free Schools opening, as a factor contributing to changing demand for home-to-school transport. This was a less dominant issue in our fieldwork authorities but a number of local authorities responding to our survey cited the creation of new schools in areas that were previously poorly served for school places in alleviating demand for home-to-school transport. This points to the importance in strategically planning the location of new schools.

Conversely, 9% of survey respondents cited closure of schools as a factor in increasing demand. Our fieldwork suggested that, again, this was particularly an issue for some of the larger rural counties. Pressure on school budgets in recent years mean that some local authorities have had to take the decision to close small rural schools that have become financially unsustainable. This alleviates pressure on the Schools Block of the Dedicated Schools Grant but creates a knock-on pressure on

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<sup>25</sup> Ministry of Housing, Communities and Local Government, Live tables on house building: new build dwellings, (July 2019), <https://www.gov.uk/government/statistical-data-sets/live-tables-on-house-building>

<sup>26</sup> House of Commons Library, Households in temporary accommodation, (2019) <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN02110>

home-to-school transport budgets as more children will have to travel further to school and may become eligible for transport under the walking distance criteria.

A further facet of the changing landscape of schools is the increasing number of schools that have chosen to become academies. One of the consequences of this change is that local authorities are seeing greater variety in term times and school start and finish times than they had done previously. Some local authorities were anxious about what this might mean in future about demands on mainstream home-to-school transport budgets. While it would not increase the number of children eligible, it has the potential to increase the number of separate routes that have to be commissioned and reduce the opportunity for sharing transport between multiple schools.

#### The changing characteristics of the underlying population

30% of authorities responding to our survey suggested that changes to the underlying characteristics of their pupil population were impacting on the numbers eligible for home-to-school transport. In a number of local authorities responding to the survey the growing number of looked after children was cited as a significant issue. For many of these children and young people every effort is made to maintain their educational provision if their foster or residential placement changes, but this can often result in long, costly and often individual transport needing to be made available.

The other changing dynamic for local authorities was changing numbers of children and young people qualifying for transport on the basis of free school meals. Nationally the population of secondary age children eligible for and receiving free school meals has remained largely stable at between 12% and 14% of numbers on roll over the last four years,<sup>27</sup> but in individual local authorities there can be quite dramatic variation – the biggest single local authority percentage decrease between January 2014 and January 2018 was 3.2%, whilst the biggest increase was 11.7%.

#### What local authorities have done to address pressure on numbers of pupils

##### Changing eligibility criteria

It perhaps seems surprising that given the range of potentially inflationary pressures outlined above the number of children accessing pre-16 mainstream transport appears to be consistently falling. This can be explained, to a large extent, by changes made by local authorities to the eligibility criteria for mainstream home-to-school transport in their local transport policies. According to our survey, 30% of the local authorities responding suggested that they had made changes to their eligibility criteria and that this had affected demand for transport. In their comments many local authorities explained that they had amended their home-to-school transport policies to bring eligibility for mainstream transport in line with statutory minimums.

Based on our fieldwork, and supporting evidence from other published research, this is the most significant factor that we can identify in explaining the reducing number of children receiving mainstream home-to-school transport and hence the reducing levels of expenditure. As the Campaign for Better Transport outlines, many local authorities have reduced their offer of mainstream home-to-school transport since 2010 to the statutory minimum, thus reducing the overall number of pupils in receipt of home-to-school transport arrangements. In total, they estimate that 27% fewer pupils are receiving home-to-school transport than was the case in 2008. This is reinforced by evidence that we gathered from our fieldwork authorities. Out of the six non-London local authorities that we visited at least five had changed their mainstream home-to-school transport policy within the last three years to remove some provision that went beyond statutory entitlements. Some of the main ways in which

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<sup>27</sup> Schools, Pupils and their Characteristics, 2015 and 2019

individual areas had reduced the number of children eligible for home-to-school transport, or the number of routes commissioned, included:

- Reviewing the safety of existing routes to school and reclassifying routes which had previously been seen as unsafe, in light of recent improvements.
- Making physical changes to unsafe routes such as installing bridges, traffic crossings or pedestrian walkways to make them safe.
- Removing discretionary elements from local transport policies such as transport provided for parents choosing Faith Schools or Grammar Schools.
- Changing travel policies to stipulate that travel will only be provided 'to the nearest school' rather than a wider definition such as schools within a designated catchment area.
- Removing provision for travel to multiple sites (for example for pupils attending more than one provision).
- Removing provision for travel to more than one home address (for example pupils who reside for part of the week with their mother and for part of the week with their father).
- Tightening up criteria for collecting children from central pick-up points.

Changes of this nature could have a significant impact -in one fieldwork local authority, for example, the number of children eligible for mainstream home-to-school transport had reduced from 3,200 to 900 between 2014/15 and 2018/19 largely as a direct result of changes to the local home-to-school transport policy. In some cases, changes to the substance of local transport policies were also accompanied by changing the names of their policies and their teams, from 'home-to-school transport' to 'assisted travel' of variants thereof. Although this might seem merely cosmetic, some local authorities explained that a change in name could help reinforce the idea that parents also had responsibilities in getting their children to school and that door-to-door 'transport' would not always be provided when a local authority could discharge its statutory responsibilities through more limited travel assistance.

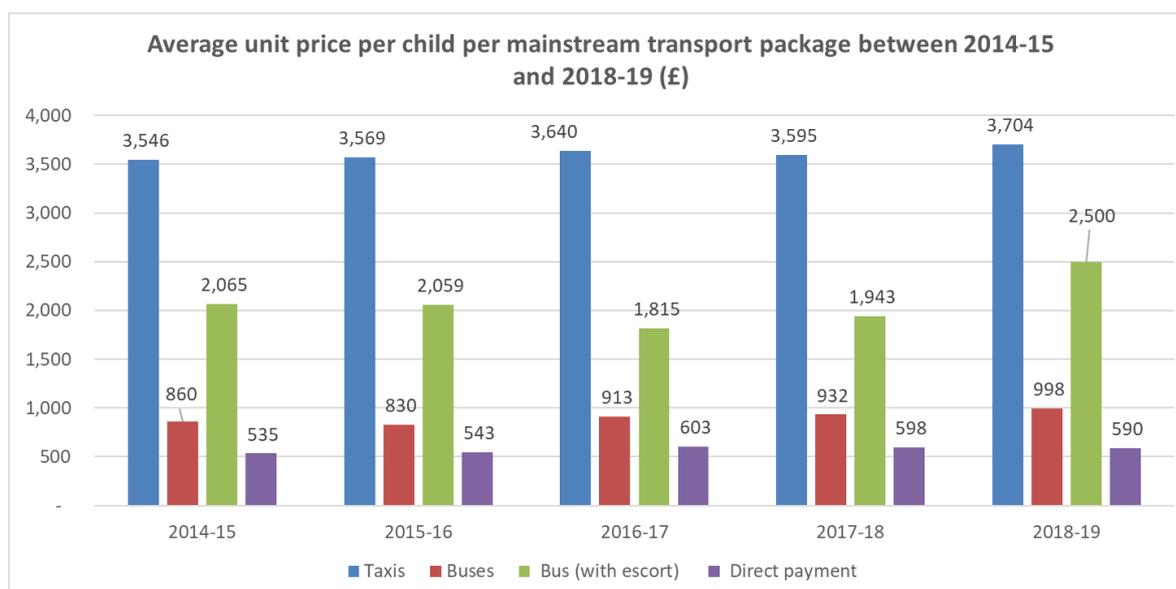
It was also clear that local areas were making quite significant changes to their post-16 mainstream eligibility criteria. The national guidance for this aspect of home-to-school transport policy is much less concrete than the corresponding pre-16 guidance and leaves more room for local discretion. Accordingly, a large proportion of the fieldwork authorities had contracted their models to provide no transport but providing some subsidies on public transport.

We engaged a number of lead members through the fieldwork who explained that decisions to reduce the eligibility criteria for home-to-school transport in line with the statutory minimum was not a decision that they took lightly. It was often politically unpopular and could cause significant short-term disruption and expense for families. However, it was a decision that they felt duty-bound to take in light of the significantly rising costs of SEND home-to-school transport, where local authorities found they had less discretion to make changes, combined with overall pressure on children's services budgets. In short, these were decisions taken through financial necessity.

#### [Factors affecting or changing the unit costs for mainstream home-to-school transport](#)

Understanding the trends in expenditure for home-to-school transport depends not just on the numbers of children receiving transport but also the unit costs of doing so. Data from our survey suggests that the average unit price per child receiving mainstream home-to-school transport has increased slowly but consistently, across different forms of transport over the last four years, as shown in Figure 13 below:

Figure 13 - Average unit price per child per mainstream transport package between 2014-15 and 2018-19 (£)



Across all forms of transport average unit costs per child in receipt of mainstream transport has increased from £1,045 in 2014-15 to £1,163 in 2018-19. Our survey and fieldwork suggest that local authorities have been experiencing significant inflationary market pressures which have, to some extent, been ameliorated by local authority attention to smarter commissioning and sharper charging arrangements.

#### Market pressures affecting the cost of mainstream home-to-school transport

One of the key themes that emerged through our fieldwork was the financial pressure on commercial bus services leading to the ending of unsustainable public transport routes. Our fieldwork suggested that this was a particularly acute issue in rural areas and was exacerbating the limited coverage of public transport and increasing the need for home-to-school transport. The Campaign for Better Transport demonstrates that between 2010 and 2016, local authorities in England and Wales have cut £78 million in funding for bus services and have reduced or withdrawn 2,400 bus routes.<sup>28</sup> With fewer public transport routes available, more children and young people may need to be transported on specifically commissioned school bus routes rather than subsidised on existing public transport. This comes at a higher cost per child.

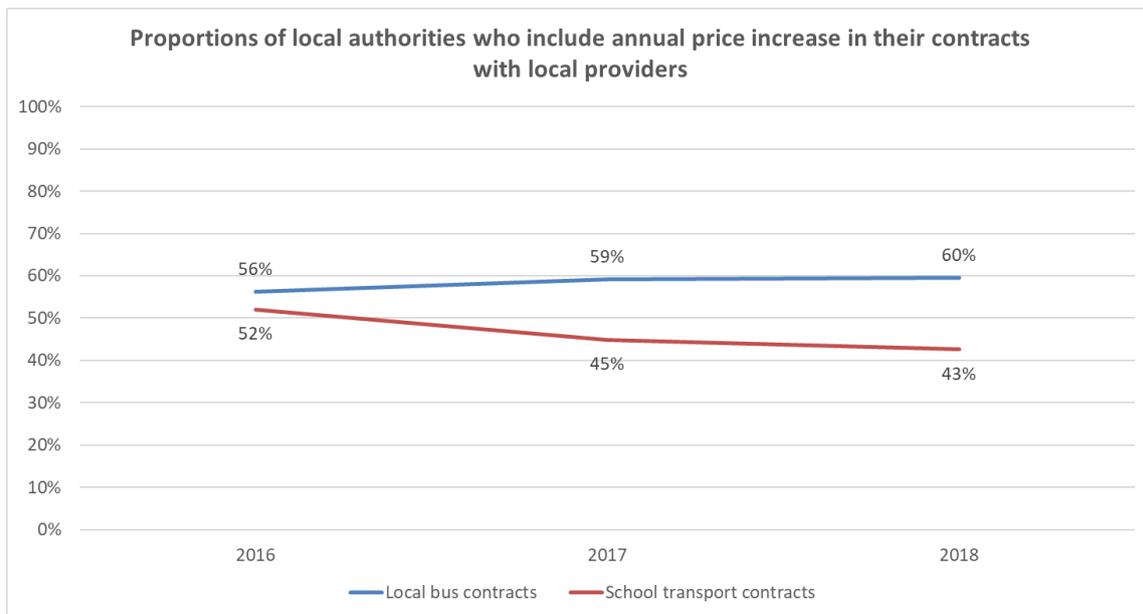
A second related factor is the number of bus companies which have ceased trading. This leads to fewer providers competing for contracts which can limit the ability of commissioners to negotiate on price. The ATCO survey records the local authorities who have had to remove or replace contracts early due to the closure of commercial bus services – it shows that consistently over the past 3 years, an average of 42% English local authorities responding to the survey had to find replacement contracts due to a removal of a commercial bus service. With low margins for providers, in some areas there may be little incentive for providers to continue operations which can have implications for further contract negotiations.

Unit price is also driven up by broader contextual factors. Local authorities have pointed to minimum wage increases, cost of fuel and vehicle costs all contributing to increased costs of contracts.

<sup>28</sup> Campaign for Better Transport, 'Buses in Crisis', (2015)  
<https://bettertransport.org.uk/sites/default/files/research-files/buses-in-crisis-2015.pdf>

Interestingly the ATCO survey showed that the proportion of local authorities building annual price increases into their contracts with local providers for school transport had dropped from 52% to 43% since 2016, as shown in Figure 14 below. This may be an indication of local authorities' efforts to control the price of home-to-school transport, but also potentially destabilises the cost-effectiveness for providers of operating certain routes and exacerbating some of the issues outlined above around the precariousness nature of the market.

Figure 14 - Proportions of local authorities who include annual price increases in their contracts with local providers



### Actions that help to mitigate cost pressures for mainstream home-to-school transport Sharper commissioning

In the majority of local authorities we visited through the fieldwork, the mainstream transport requirements would be determined either by a strategic lead for Home School Transport within the local authority or by the lead responsible for admissions and then the detailed commissioning and day to day interactions with the transport providers would be handled by the local authority's integrated transport team. In a small number of authorities, responsibilities for commissioning and funding transport arrangements were shared between the local authority and the Combined Authority which was used as a mechanism to facilitate joint planning between different authorities. In our survey, we asked who was responsible for strategic oversight of transport, commissioning contracts and who held budgetary responsibility to get an understanding of the teams involved. Based on respondents, 51% of local authorities kept all three functions within the same single team – whether that be the transport team, broader Children's Services team, or contracted out to a third party. 40% of respondents had two of these functions in the same team and only 9% of local authorities split these functions across three different teams. The most common teams to be involved were transport and broader Children's Services.

It was apparent, both from the survey and from discussions with Integrated Transport team leads, that local authorities have deployed a wide range of different commissioning mechanisms to gain maximum value for money from mainstream transport contracts. Different local areas appeared to have reaped benefits from different approaches, which may be in part a reflection of the prevailing market conditions and the volume of transport being commissioned. It is therefore not possible to say

which approaches are likely to deliver the greatest benefits. However, some of the different commissioning approaches being used by local authorities which they felt had created additional value are listed below:

- Most of the local authorities engaged in the fieldwork were undertaking regular and wholesale reviews of routes to make sure that they were achieving maximum efficiency in filling buses, reducing transport distances where possible, and combining pick-ups and drop-offs in a strategic way. A number of authorities had invested in mapping software that could enable route reviews to be carried out more frequently and with fewer person-hours than traditional more manual methods.
- The counterpart to regular and effective route reviews was tendering contracts in a flexible way that would enable local authorities to make sensible adjustments to the number of buses, journeys or routes a provider would be asked to make, within an agreed price tolerance, so that the transport provision on offer could respond to changes in demand. Some local authorities, for example, described being able to have strategic discussions between providers that could create more sensible allocations of routes which might have a win-win outcome for both the local authority and the provider.
- Some local authorities in the survey spoke about moving towards or trialling either dynamic purchasing systems or e-tendering systems. These can include a variety of flexible contracting approaches, for example, automated systems where providers can bid for individual routes.
- A number of local authorities were also trialling contracting where they only paid for seats used – contractors were expected to provide registers of attendance from which the local authority would assess the regular non-attendees to see if they required alternative packages and if they could be replaced by either a paying individual or another eligible student.
- In many London local authorities, boroughs are working together trying to jointly commission transport and jointly manage unit costs. This is easier given size of London boroughs and traditions of cross-boundary working, but examples of joint commissioning and planning are also developing in combined authorities
- Finally, local authorities described experimenting with different contract lengths. On this topic local authorities were trying to weigh up a number of conflicting considerations. Longer contracts sometimes provided the opportunity to lock-in a better price by giving providers more certainty of future income but could lead to local areas being tied in to a particular pattern of provision which may become less efficient over time as the journeys pupils make need to change. Conversely shorter contracts provide more opportunity for review but can also lead to instability being 'priced in'.

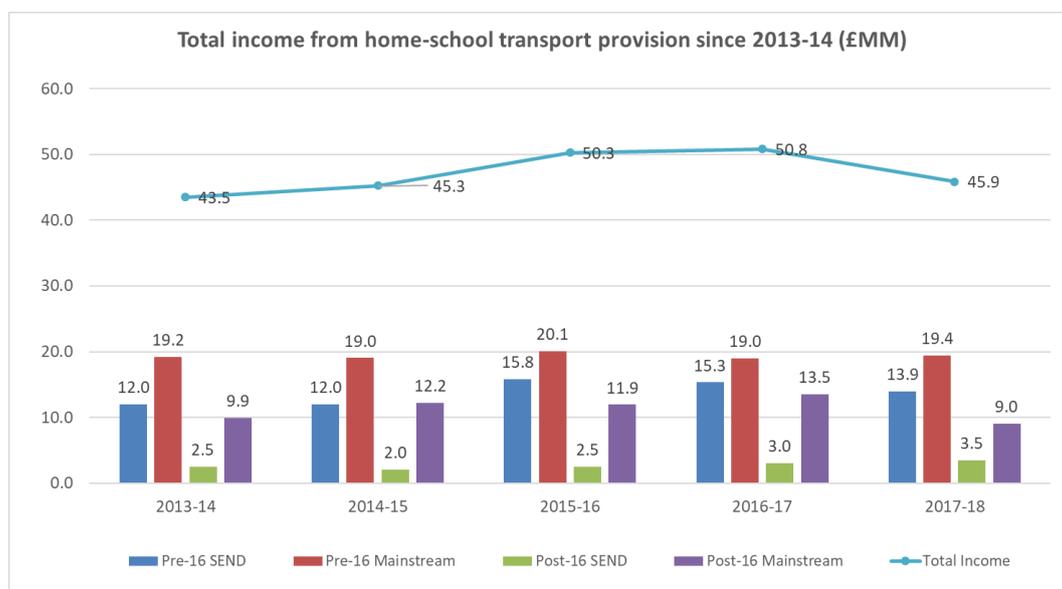
Evidence from both our fieldwork and our survey point to the important role that really effective commissioning can have in controlling the other factors that might lead unit costs of mainstream home-school transport to increase. However, local authorities were also at pains to point out that commissioning is as much about quality as cost. Some local authorities described how, if contract prices are driven too low, the quality of the service may suffer in terms of punctuality and reliability and can lead to false economies with considerable officer time being taken up with dealing with complaints and potentially ending up having to retender services at increased cost. Others described the importance of including agreed quality measures in contracts to ensure the continued value of what was being provided. Too extensive a focus on driving costs down can also result in the reduction of the number of providers operating in an area, as few are able to absorb such low cost. An increasingly limited market can see an increase in costs over time too.

A further issue that was raised in one fieldwork authority was the extent to which councils' interpretation of procurement legislation might limit or hamper the discretion of commissioners to make sensible strategic adjustments to contracts without the need to undergo a formal retendering exercise. There appeared to be some differences between local authorities in their interpretation of the degree of flexibility within contracts that was permitted within existing procurement legislation.

### Income generation

Alongside more strategic, sharper commissioning, a trend increasingly seen in local authorities is the increase in income generated by charging children and young people who do not qualify for transport. Some areas have set this up on a termly bus-pass basis, whilst others had a walk-on setup for any seats not used that day. Apart from a decrease in income generated in 2017-18, published data has shown a steady increase in total income generated by home-to-school transport (Figure 15). When comparing income generated between 2013-14 and 2016-17, the biggest growth came in post-16 mainstream provision of +36%, +28% growth from pre-16 SEND transport and +22% for post-16 SEND transport.

Figure 15 - Total income from home-school transport provision since 2013-14 (£MM)



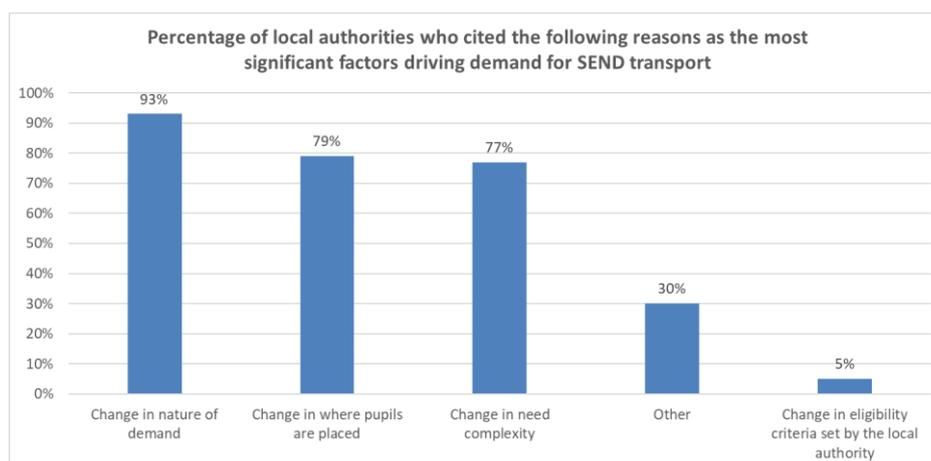
## Part 3: Explaining the underlying factors influencing SEND home-to-school transport

For mainstream home-to-school transport we have described an emerging context of mild to moderate inflationary pressures affecting the demand for transport and costs of providing transport which have been offset by reductions in discretionary local eligibility criteria (above statutory minimums) and a strong focus on achieving value for money through contracting and income generation. The picture for SEND home-to-school transport is very different. Here we have seen a significant rise in both the numbers of children in receipt of transport and the associated costs of providing that transport year on year. The following sections aim to set out both the factors that are contributing to the increasing spend on transport for children with SEND and the range of strategies that local authorities have deployed in controlling this expenditure.

## Factors leading to increasing spend and demand for SEND home-to-school transport

In our survey we asked local authorities about the most significant factors driving changes in demand for SEND home-to-school transport (Figure 16). Nearly all local authorities cited the changing nature of demand, by which they meant increasing numbers of children with EHCPs, as a significant contributory factor. Over three-quarters of respondents also cited where children are placed and complexity of needs as significant factors. The following sections explore these three important drivers of demand in greater detail, as well as highlighting the role of market forces in increasing unit costs.

Figure 16 - Percentage of local authorities who cited the following reasons as the most significant factors driving demand for SEND transport



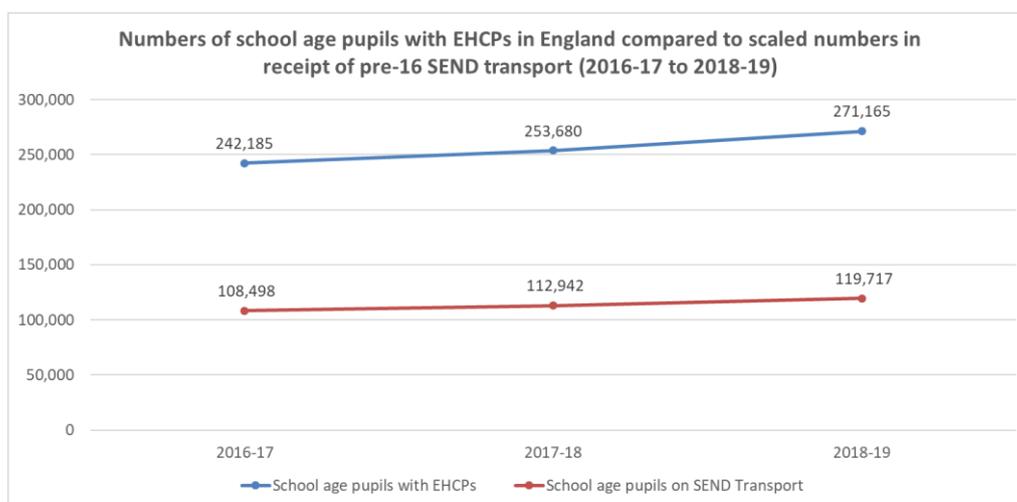
### Increasing numbers of children with Education Health and Care Plans (EHCPs)

Data published by the Department for Education shows that between 2014 and 2018 the number of children and young people with an EHCP or statement of SEND increased by 35% from 237,111 to 319,819.<sup>29</sup> This is in stark comparison with the previous five years (2010 to 2014) in which the number of children and young people with statements or EHCPs increased by just 4%. Any analysis understanding the demand for SEND transport is incomplete without a consideration of the increasing pressures on the high needs system.

Figure 17 below shows how the rising numbers of children with EHCPs correspond with the rising numbers of children and young people in receipt of home-to-school transport due to special educational needs. Though year on year percentage and absolute increases are steeper for numbers of EHCPs, the direction of travel is directly comparable. It is worth noting here that according to the guidance, an EHCP does not entitle a child to home-to-school transport provided by the local authority, and the divergence in numbers of EHCPs versus numbers in receipt of transport reflects this fact. Similarly, the difference between the number of children with EHCPs in a local authority and the number of children in receipt of SEN transport can be due to variations in how local authorities interpret the guidance: in their definition of nearest suitable school and in their interpretation of whether the child would otherwise be unable to access education if unassisted.

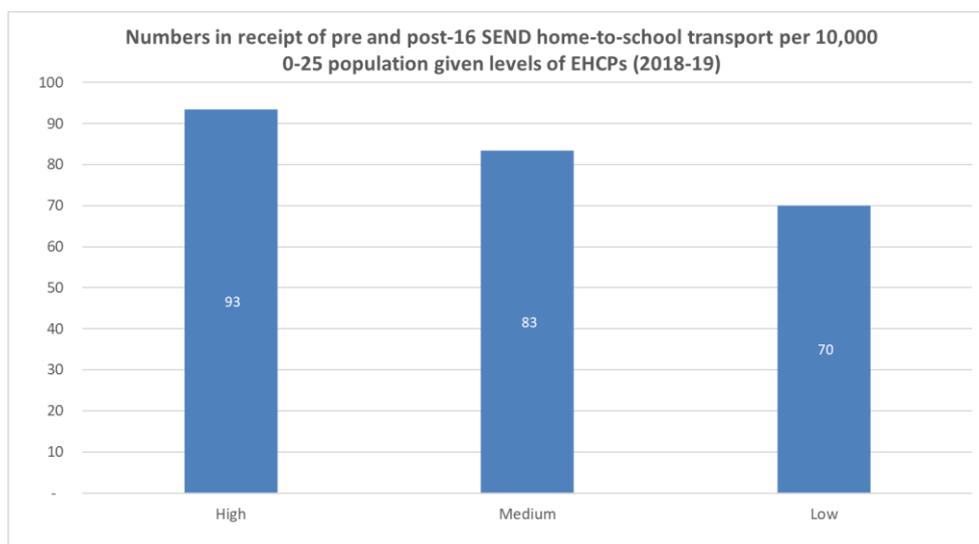
<sup>29</sup> Statements of SEN and EHC Plans: England, 2018

Figure 17 - Numbers of school age pupils with EHCPs in England compared to numbers in receipt of pre-16 SEND transport (2016-17 to 2018-19)



At an individual local authority level, the relationship between EHCP levels and the number of children and young people accessing transport is clear. Figure 18 shows the local authorities with low numbers of EHCPs per population provide SEND transport to 25% fewer pupils per 10,000 population than those with high rates of children and young people with EHCPs.<sup>30</sup>

Figure 18 – Numbers in receipt of pre and post-16 SEND home-to-school transport given high/medium/low proportions of EHCPs per local population (2018-19)



Although the guidance is clear that the fact of having an EHCP does not, in itself, provide entitlement to assistance with transport many local authorities pointed to the impact of the Children and Families Act in raising parental expectations for what local authorities could and should provide for children with SEND. These raised expectations, according to local authorities, can often apply to transport as much as to educational provision. Working with parents constructively and collaboratively to determine the extent of parental responsibilities with regard to transport versus local authority responsibilities for transporting children with SEND remains an ongoing challenge.

<sup>30</sup> SEN2 2010-2018 and Population figures from Section 251: Pupil Numbers, 2018

### Increasing complexity of needs

The next important factor driving increasing expenditure on SEND home to school transport is the increasing complexity of needs experienced by children and young people. Through the survey conducted as part of Isos Partnership's report for the LGA on high needs spending - *Have we reached a tipping point? Trends in spending for children and young people with SEND in England (2018)* - local authorities were asked what were the most significant factors that were leading to demand or cost pressures on the high needs budget.<sup>31</sup> Out of ninety-one responses, nearly a third of local authorities pointed to the greater complexity of need contributing to pressures.

The same phenomenon is driving increased expenditure on home-to-school transport. Local authorities which engaged in the fieldwork explained clearly how greater numbers of children and young people with more complex needs were coming to their attention and requiring transport solutions which were more bespoke and higher cost. Local authorities identified two particular groups of children for whom this was the case: children with very complex medical needs and children and young people with very challenging behaviour.

For those with complex medical needs, local authorities described the range of physical adaptations that may need to be made to vehicles to keep children and young people safe and comfortable during their journeys to school. Local authorities also described how, for those with life threatening medical conditions, much more highly skilled and trained Passenger Assistants needed to be provided with transport (either on buses or in taxis) to be able to provide appropriate care in the case of a medical emergency.

The second group of pupils identified by local authorities as contributing to increasing costs of home-to-school transport were those exhibiting challenging behaviour. Since 2012/13, there has been a rise in the number of permanent exclusions of 67% and a rise in fixed term exclusions of 43%.<sup>32</sup> Of the children and young people permanently excluded in 2016-17 with a special educational need, 61% had social, emotional and mental health as a primary need and of those who were fixed term excluded, 54% had social, emotional and mental health as a primary need.<sup>33</sup> At the same time, there has been a general rise in more complex SEMH and behavioural needs, with the number of children and young people on either SEN Support or with an EHCP with a primary need of SEMH or ASD increasing by 22% and 46% respectively since 2015.<sup>34</sup>

The impact of these trends on transport are multiple. Firstly, with more permanent exclusions comes more demand for placements in a local area's Pupil Referral Unit (PRU) or alternative provision. Typically, the locations of such provision are likely to be further afield than a child's previous local school and more children will therefore become eligible for transport. Local authorities also face particular challenges for those young people whose alternative provision may be carried out on multiple sites. Providing individual and bespoke transport to these settings increases the chance of the young person attending but comes at a significant financial cost. A number of authorities, not just in London, identified an increasing cohort of young people who could not be transported together or could not be educated together due to significant concerns around gang affiliation, criminal exploitation or violence. Again, the impact for this in transport terms is more individual journeys and

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<sup>31</sup> Local Government Association, 'Have we reached tipping point? Trends in spending for children and young people with SEND in England', (2018), <https://www.local.gov.uk/have-we-reached-tipping-point-trends-spending-children-and-young-people-send-england>

<sup>32</sup> Permanent and Fixed Period Exclusions in England: 2016 to 2017

<sup>33</sup> Permanent and Fixed Period Exclusions in England: 2016 to 2017

<sup>34</sup> SEN in England: January 2015 and SEN in England: January 2019

higher costs. Finally, local authorities also explained the need to make provision for a growing cohort of young people whose extreme behaviour on transport put either themselves, the driver or other road users at risk. In those cases, local authorities had little choice but to commission individual taxis with one or more Passenger Assistants in place at a very high unit cost.

Increasing distance travelled due to school occupancy and distribution of specialist provision  
So far, we have considered how demand and spend on SEND transport is heavily influenced both by the increasing number of children and young people with EHCPs and by the increased complexity of need. Both these factors in turn are driving changes to where children and young people with SEND are placed, and this is itself having a major impact on expenditure on transport. This was cited as an important factor by 79% of authorities which responded to our survey. Most local authorities in our fieldwork echoed this point, outlining that more children with EHCPs are being educated in special schools and when local special schools become full, the 'nearest suitable school' is necessarily further afield. This is particularly acute if no available local special schools are deemed adequate for a child and the child is sent to an independent or non-maintained special school, possibly out-of-county or borough. Furthermore, a number of local authorities reflected that because children are often placed in special schools on an individual basis, as and when a suitable space becomes available, the net result is sub-optimal in transport terms. Local authorities described how children might be being transported from opposite ends of an authority in different directions, because that happened to be where the space was available at the time when they needed it. Once a pupil is well established in a school there will often be little appetite to move them purely for transport reasons.

The effect of special schools which are full is particularly challenging for counties because the distance to the next nearest suitable provision may be very great indeed. A number of counties described how difficult it was even to combine journeys for pupils because to do so would make journey times unacceptably long, again leaving them with few options other than solo taxi provision. Local authorities which had set up 'area special schools' which could cater for a wide range of needs fared somewhat better in being able to control their transport costs, but those which had a number of very specialist provisions which catered for particular or discrete needs could frequently find themselves transporting individual children for an hour or more each way hugely contributing to home to school transport expenditure. It is worth noting, as set out in Figure 19, that rural areas use taxis for transporting children and young people with SEND much more frequently than urban areas and the average unit costs per child (Figure 20) are considerably higher in rural areas for taxi transport than other forms of transport.

Figure 19 - Percentage split of package types used in provision of SEND transport, split by rurality (2018-19)

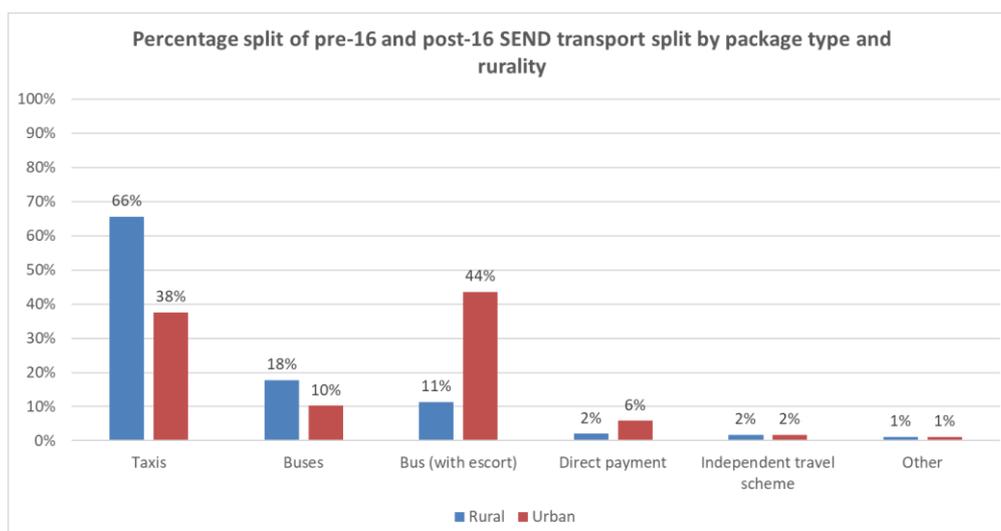
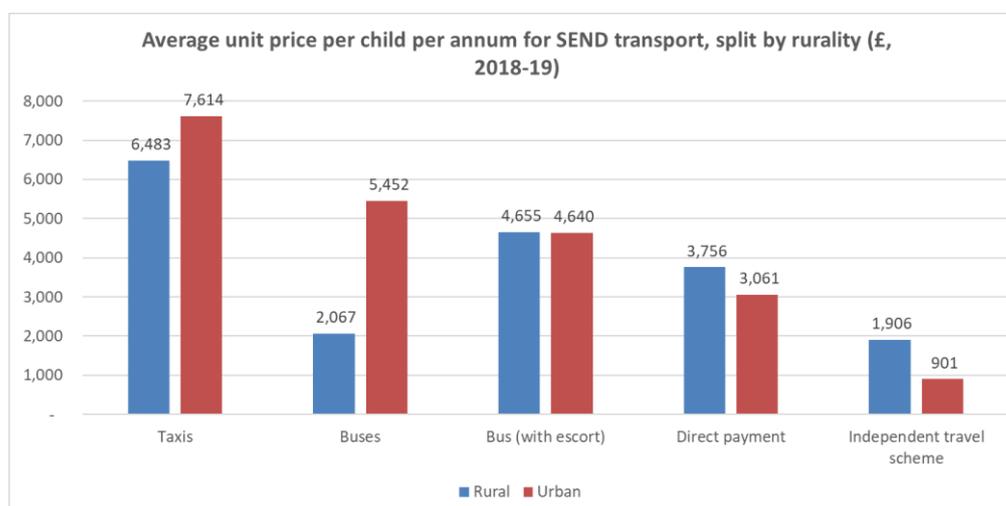


Figure 20 - Average unit price per child per annum for SEND transport, split by rurality (£, 2018-19)



We used the data from our survey and published data to further test the hypothesis that the limited spare capacity in special schools is a significant contributory factor to high expenditure on home-to-school transport. We found that when looking at the relationship between number of special school places commissioned versus the number of pupils placed in special schools, local authorities who place considerably more pupils than places commissioned tend to have a higher spend on SEND transport. For local authorities which place many more pupils in special schools than the number of places they formally commission, the average spend per child or young person in receipt of SEND transport is £7,738. This compares with £3,440 per child in local authorities in which the number of commissioned places is much closer to the actual number of children in special schools.<sup>35</sup> This supports the argument that full local special schools drive up spend, because it shows that local authorities with more special schools at, or over, capacity might have to transport children further afield. Similarly, when analysing the relationship between spend and placements in independent or non-maintained specialist schools (INMSS), spend on SEND transport is somewhat higher per child for local authorities that have higher proportions in INMSS. For local authorities with high proportions of children with EHCPs placed in

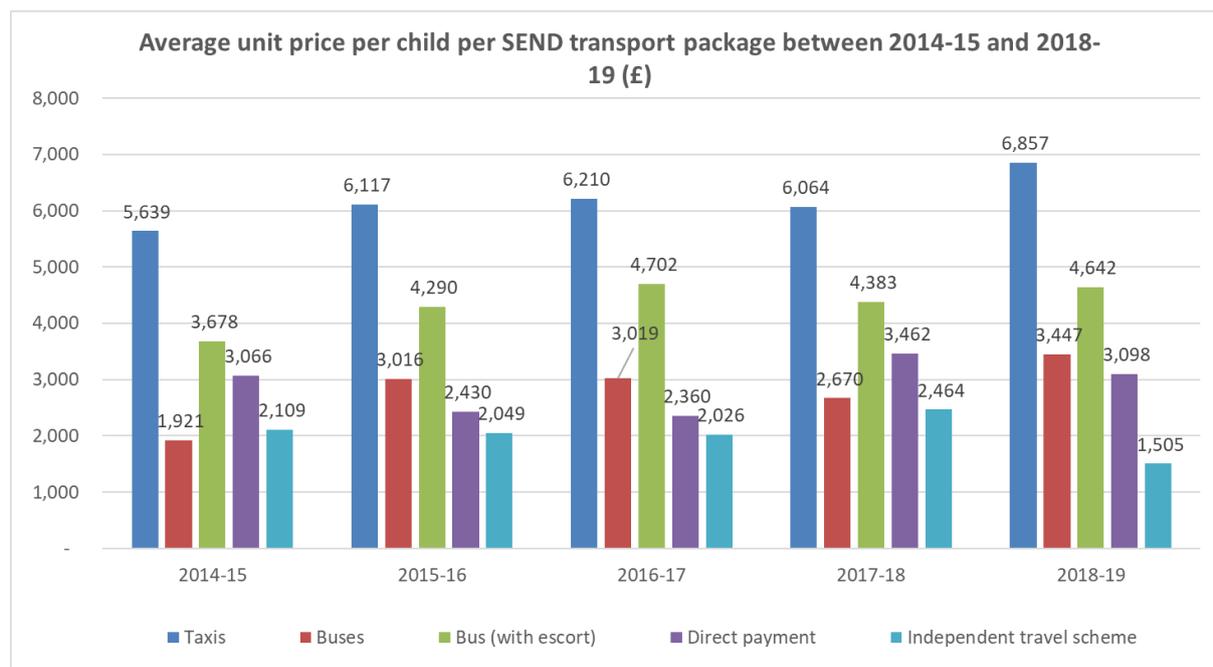
<sup>35</sup> High needs: place allocations for 2017-2018 and Schools, pupils and their characteristics: January 2018

INMSS, the average spend per child on SEND transport is £5,842 compared to £5,428 for local authorities with low proportions.<sup>36</sup>

### Market forces within the SEND transport sector

As is the case for mainstream transport the average unit price (per child per annum) for SEND transport has increased over the last 5 years from £4,561 to £5,379. Within this overall trend, there have been some significant increases for particular types of transport. In particular, the unit cost per child of bus travel (both with and without an escort) has increased quite significantly. Taxi unit costs have also seen a substantial increase over the period.

Figure 21 - Average unit price per child per SEND transport package between 2014-15 and 2018-19 (£)



There are a number of possible reasons for this unit cost increase for taxi and bus journeys. In terms of transport by taxi, some local authorities which took part in our fieldwork described the difficulties that they experienced in commissioning sufficient taxi capacity, with some companies choosing not to bid for the work. This could leave local authorities with a smaller pool of providers and fewer opportunities to limit cost increases. This point is echoed by the ATCO survey which traces how the number of tenderers per local bus contract vary. For SEND transport contracts, it shows that the average number of tenderers per contract has decreased from 7 to 5 since 2017.

Many authorities also indicated that requiring providers to be compliant with the Public Service Vehicle Accessibility Regulations (PSVAR, 2016) though incredibly important, forces up unit price. PSVAR-compliance applies to buses with more than 22 passenger-capacity and requires that, amongst other things, there is sufficient space for a wheelchair, priority seats for disabled passengers, and audible and visible signals to stop a vehicle and/or to request a boarding device. This has led to increased unit prices for many authorities as the pool of suitable, fully compliant buses has reduced and because the process to become compliant requires major, costly alterations to fleets. With an

<sup>36</sup> Statements of SEN and EHC plans, England, 2018 and Section 251: Outturn, 2017-18

increase in multi-sensory impairment cases of 204% since 2014,<sup>37</sup> PSVAR-compliance and adequately equipped transportation becomes ever more vital to transport children safely.

### Actions that help to mitigate cost pressures for SEND home-to-school transport

Those local authorities which appear to have been most successful in containing the rising expenditure for home-to-school transport for children with SEND have taken a very strategic approach to commissioning and provision of home-to-school transport; placed the long-term needs of the child at the heart of their strategy; have been disciplined in the execution of their stated policy and imaginative in coming up with creative options. Actions that help to mitigate cost pressures for SEND transport include taking a strong strategic approach to SEND and inclusion; establishing clear leadership of SEND transport planning and joining-up across teams; developing a menu of travel assistance options, skilfully facilitated with parents and schools; and working in partnership with schools and across services. These are each explored in greater detail below.

### The strategic approach to SEND and inclusion

Local authorities were clear that managing the costs of SEND transport must start with a strategy for how to ensure that as many children with SEND as possible are educated successfully in their local schools in a way that meets their needs and enables them to thrive. This means developing a successful graduated response in the mainstream sector to support children with SEND. This, in turn will help alleviate pressure on maintained special schools creating more opportunities to place children in special schools close to home and reduce reliance on more distant or INMSS provision. Some local authorities were looking towards a capital investment strategy to create more capacity in local special schools, others were looking to review the designation of particular schools to better meet the presenting needs of children in a particular area and others were strategically considering the creation of SEND units or resourced bases attached to mainstream schools to enable more children to be educated closer to their families. However, local authorities were also wary of simply creating additional provision, recognising that if not commissioned effectively it could lead to more children who might otherwise be successfully educated in mainstream provision moving into the special sector, creating additional pressures on both the high needs block and the transport budget. None of the solutions set out above are easy, and there are considerable obstacles local authorities face in reshaping their provision for SEND and developing deeper approaches to inclusion in mainstream settings. Nonetheless, relentlessly pursuing an aspiration for good local provision for as many children with SEND as possible was an extremely important basis for managing the associated costs of transport.

### Clear leadership of SEND transport planning and join-up across teams

The second strategic consideration is how well local authorities were able to establish coherent and joined up ways of working between those who set the SEND transport policy, those who make decisions about individual pupil placements, those who make decisions about the award of transport assistance and packages and those who commission the actual transport.

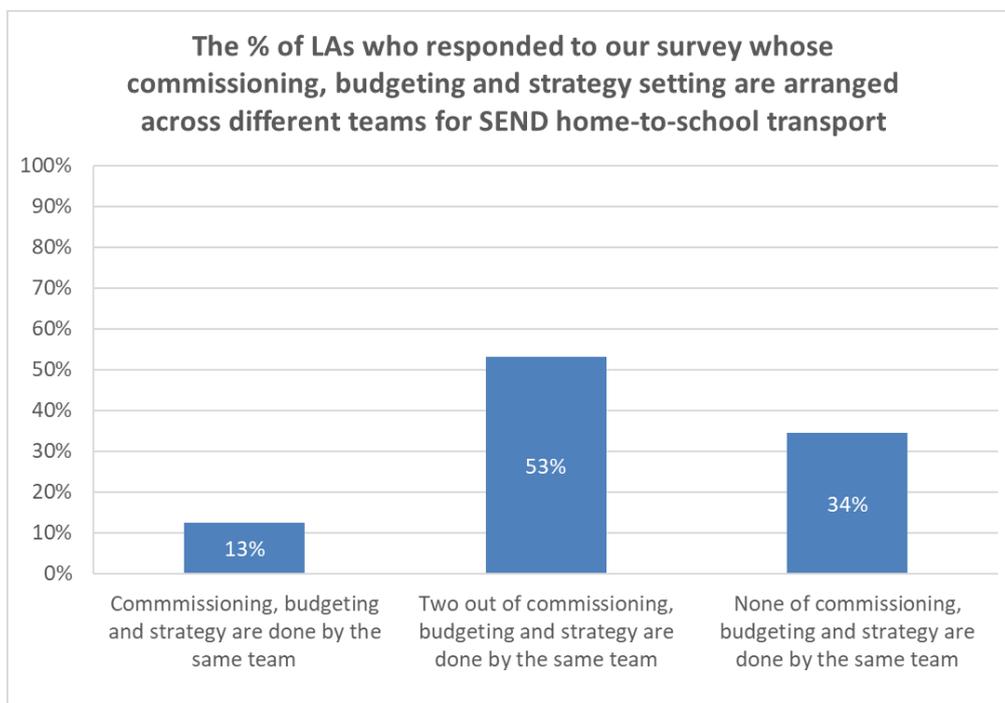
It appears to be a feature of the delivery of SEND transport that strategy, commissioning and budget holding functions tend to be split across multiple teams. When we asked local authorities how these functions were organised through our survey, thirty-two local authorities responded to this question and 53% of these stated that only two out of the three commissioning, budgeting and strategy functions for SEND transport were found in the same teams, whether that be a transport team, SEND team, broader Children's Services team or contracted out to a third party. In fact, when aggregated,

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<sup>37</sup> SEN in England: January 2014 and SEN in England: January 2019

87% of respondents show that these functions are carried out by at least two or three different teams, as shown in Figure 22 below:

Figure 22 - Percentage of local authorities who responded to our survey whose commissioning, budgeting and strategy setting are arranged across different teams for SEND home-to-school transport



This split of key functions across different teams can inevitably cause a lack in strategic join-up and communication, unless united through a strong central leadership function. Some local authorities spoke of the importance of keeping the budget for home-to-school transport within the SEND team so that the cost of transport is always a routine part of placement decisions. However, according to our survey, less than half of respondents (44%) had commissioning and budgeting decisions taking place in the same teams. Though having budgetary responsibilities in the same team as commissioning or placement decisions is not vital, building the ability of teams to talk to each other, free up funding, share understanding of cost implications and plan strategically is key to a well-planned system that does not leave expensive transport packages unchallenged. Transport can be better integrated into strategic decisions in several ways. For example, a number of local authorities had done considerable work with SEND teams to build into placement planning a process that looks at associated costs of travel when identifying a suitable school and ensuring that individual travel arrangements are then regularly reviewed.

On the flipside, local authorities where there is a disconnect between SEND teams and transport commissioners have cited the lack of join-up as a key contributor to increasing requests and the awarding of more expensive transport provision. In some cases, this was because the cost of travel arrangements was not always sufficiently taken into account when decisions were being made as to where to place a child. In other cases, those who were awarding transport packages were not sufficiently skilled in understanding the specific needs of the child and might, by default, opt for a more expensive package (such as an individual taxi) because it appears to be a lower risk option. Finally, some local authorities also drew attention to situations when those making day to day decisions simply did not have sufficient perspective on the cumulative budgetary implications of such decisions.

### *A menu of travel assistance options, skilfully facilitated with parents and schools*

Many of our fieldwork authorities argued that successfully managing SEND transport budgets within the current policy and funding context depends on the quality of the initial conversations with young people and families. A number of authorities were able to point to the critical importance of having effective transport advisers in place who were able to accurately assess and moderate applications for transport, and discuss with both young people and parents how travel assistance might be provided and how that might evolve over time. Conversely, where local authorities did not have a meaningful dialogue with parents and young people embedded within the process for determining transport arrangements, this could lead to very expensive packages emerging as a result of limited assessments of a child's needs, adversarial relationships with families or more formal challenge through Tribunals or other legal processes.

Importantly, some local authorities had been successful in setting out and communicating effectively what 'assistance with travel' means in local policy terms and resetting expectations away from the assumption that bus or taxi transport would be provided for children with SEND as a matter of course. In one local authority they had set out a very clear hierarchy of transport offers which they would discuss with parents. They started from the basis that wherever possible the parent would be able to support the child or young person in travelling to school. If this was not possible then they would explore options around independent travel training or providing a parental allowance. Only if these options had been considered and found to be unfeasible would commissioning a place on a bus be considered. Taxi travel was then seen as the option of last resort.

Such an approach tends to be more effective where there is genuine and meaningful dialogue with families that enables them to see the potential benefits of some of the options under consideration. A number of local authorities, for example, described the importance of promoting and developing independence for young people on the pathway to adulthood, and the critical contribution that becoming an independent traveller might make to that goal. In some authorities, objectives around independent travel training were written into EHCPs making the learning ambition explicit. Similarly, some local authorities were able to describe the positive difference that personal allowances for travel had made for some young people, by enabling them to have a more consistent and familiar travel experience with their parent or main carer (as opposed to being in a taxi with many different drivers) and arriving at school more ready to learn.

Being able to have a facilitated dialogue with parents around travel does depend on having different options available, and for these to be strategically embedded within the service. It should be acknowledged that some local authorities had not found independent travel training or personal allowances to have made a significant difference to the cost of transport as it had not enabled them to take children out of taxis or commissioned buses in sufficient numbers. It is therefore worth reflecting on what can increase the impact of these schemes.

### *Independent travel training*

The premise of independent travel training (ITT) is providing young people with SEND with the skills to enable them to travel to school safely on their own using public transport. It depends, therefore, on having an adequate public transport infrastructure in place to allow the journey to be made simply and time-efficiently. It is therefore more likely to be used widely in more urban areas where the density of public transport is greater. Nonetheless, a number of counties were able to use independent travel training successfully in parts of the authority. Findings from our fieldwork suggest that ITT is likely to be more effective when it is strategically embedded within the local authority's approach (i.e. it is routinely considered for all young people with sufficient maturity and ability to

complete the training); when the decision is made in partnership with both families and schools and reinforced at home and through the curriculum; where the emphasis is on promoting independence and developing life opportunities rather than cutting costs; when there is really robust risk assessment in place that ensures everyone feels safe; and when the training and assessment is carried out by skilled practitioners, on the actual transport routes that the young person will be using, with sufficient time and iterations for the young person to develop their confidence, capacity and skills.

#### *Personal allowances*

The purpose of personal allowances is to provide financial assistance to parents or carers to enable them to take responsibility for transporting their child to school. Our fieldwork suggested that these arrangements tend to achieve greater take-up among parents and deliver greater cost-savings to the local authority when discussion around personal allowances is a strategic starting point rather than a secondary option, when there is sufficient scope and creativity to allow parents to set the scope of the allowance and how they would want to use it, and when there are clearly defined parameters for the upper limit that might apply. In one local authority, for example, they were willing to agree parental allowances up to the limit of the next cheapest available transport option that the local authority could secure for the child in question.

Evidence suggests that parents can choose to use allowances in a number of ways, from covering their own direct costs of transporting the child to school through to making their own taxi arrangements. Some local authorities, for example, suggested that parents could secure much better rates than local authorities by dealing directly with taxi companies as individuals rather than through a corporate contract. It is worth noting here, however, that one local authority had encountered an issue where a personal allowance for travel was deemed to be income and resulted in a parent's universal credit being reduced. This was an isolated incident and was resolved by the local authority but suggests that there may be benefit in setting out clearer guidance for how personal allowances can be set up in way that ensures they are not deemed as income for either tax or benefit purposes.

#### *Working in partnership with schools and across services*

Finally, a number of local authorities are looking at working differently in partnership with schools and across services to explore alternative ways of providing transport. One option that has been used successfully in some areas is devolving home-to-school transport budgets to schools to enable them either to make their own commissioning arrangements or develop and run their own transport. In some cases, local authorities found that if a school was commissioning all of their transport from one provider, they were better able to negotiate contract prices than the local authority could. In some of the local authorities to which we spoke, SEMH special schools in particular were often keen to take up the offer of devolved transport budgets because they found that by having greater control over the choice of drivers and passenger assistants and by employing people who were skilled in working with young people in these roles, they experienced less disruption on journeys to school and better attendance. However, in other areas, schools were nervous of taking on both the administrative burden and the financial risk of organising such arrangements.

A second facet of how local authorities were working with their special schools around the transport agenda was in negotiating staggered school start and finish times that might enable more effective use of buses to serve multiple schools. Some local authorities have also offered to support special schools in offering Breakfast Clubs to enable flexible drop-off and pick-up times to aid working parents and increase the number of parents able to bring their child to school.

Finally, local authorities are also working across services to maximise the use of, and in some cases increase, their in-house fleet provision. For example, one local authority described how it is

considering working across SEND and adults social care to explore how existing local authority minibuses could be deployed more cost effectively if adjustments were made to school starting times and to the timing of transport to adult day care provision. This ties into the point made by Contact in their inquiry 'School transport for disabled children' (2017) around smart commissioning to ensure better usage of existing fleets. Contact suggests the blending of commissioning to use the same fleet to deliver services to different client groups to utilise vehicles during down-time and altering school start times so local authorities can use half the number of vehicles to drop the same number of children.

### What limits local authorities' capacity to contain spending pressures on home-to-school transport?

This research suggests that through clear attention to eligibility requirements, smart commissioning, strong strategic leadership of the SEND agenda, effective working across service boundaries and with schools, and more creative and earlier dialogue with parents, local authorities are able to mitigate some of the increased spending pressures on home-to-school transport. However, there is a limit to what local authorities can achieve. Nationally expenditure on home-to-school transport has increased by £66 million in four years, and the national level of deficit in this area – the extent to which local authorities have collectively overspent their budgets – stands at £111 million in 2017-18. It is therefore worth reflecting briefly on what limits the capacity of local authorities to control spending pressures in this area.

First of all, it must be stated again, that all the growth in home-to-school transport expenditure is currently being driven by increases in expenditure on SEND transport. There are considerable policy, funding, demographic and societal pressures which, in combination, are fuelling the unprecedented rise in the number of children with EHCPs, the increasingly complex presentation of their needs, and the crisis in special school capacity. These have been well documented in a number of research studies and all, to a greater or lesser extent, sit outside the control of individual authorities. All these factors are fuelling the increased expenditure on SEND transport.

Secondly, there is an unresolved tension at the heart of home-to-school transport policy between the responsibilities of parents in getting their children to school versus the expectations of parents in the level and type of assistance that local authorities can provide. There have been a number of high-profile judicial reviews which have been found in favour of parents where local authorities have tried to reduce transport entitlements. In a similar vein, some of the local authorities engaged in our fieldwork highlighted examples of reforms and cost reductions that they had attempted to introduce but had relinquished in light of strong parental opposition. Existing ambiguities in the guidance and mismatches between statutory requirements for SEND and statutory requirements for transport can make these disputes more difficult to resolve. For example, while there is no legal obligation to provide transport to children below statutory school age, some local authorities had come under very strong pressure from parents to provide transport assistance to a nursery school named on a child's EHCP if that was beyond statutory walking distances.

Thirdly, there are further unresolved tensions between some of the broader strategic aims of local authorities and schools and the need to limit expenditure on home-to-school transport. For example, putting in place a good transport offer for young people at risk of poor attendance, attending multiple alternative provision sites, or getting back into college post-16 after a period of being NEET can all help with furthering the educational outcomes and life-chances for those young people, but they all require investment in transport on the part of the local authority over and above statutory requirements.

In addition to these common pressures, rural local authorities as a result of longer distances, lower population densities, limited public transport networks and more sparsely distributed schools bear a disproportionate financial burden both in terms of the relative number of children and young people who are eligible for transport and in the cost per head of making transport available.

Finally, mainstream home-to-school transport is stable for now and reductions in this area have helped to offset the increased spend elsewhere. However, this position cannot be expected to last indefinitely. Survey and fieldwork evidence suggests that many local authorities are now at, or close to, the statutory minimums for mainstream transport provision and the market may not sustain ever-greater efficiencies driven through commissioning. This strongly suggests that local authorities might be fast approaching a limit to the reductions that might be made in mainstream transport expenditure, which will serve to exacerbate the pressures on SEND transport spending.

## Part 4: Future projections

Having considered a general picture of increasing demand and expenditure, we have also considered how these trends will continue going forward. Built into our assumptions for predicting future demand are the messages we received from survey respondents around their confidence in their abilities to balance budgets for mainstream and SEND transport (Figure 23). The broad trend shows that local authorities were much more confident in their ability to balance budgets for mainstream transport, with 71% of respondents either very or quite confident. This compares to 84% of respondents either not very confident or not at all confident in their ability to balance budgets for SEND transport.

Figure 23 - Percentage of local authorities and their confidence around their ability to balance SEND and mainstream home-to-school transport budgets over the next five years

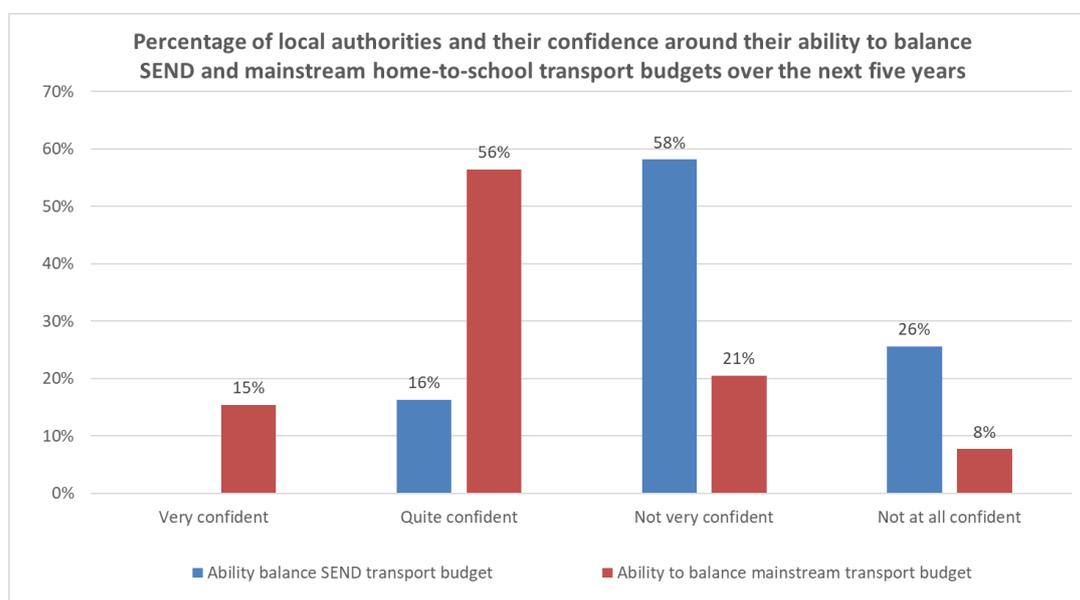


Figure 24 and Figure 25 suggest a potential direction of travel of numbers in receipt and possible expenditure on home-to-school transport based on a linear regression of historical data<sup>38</sup>. For Figure 24, we have scaled up the numbers provided by the local authorities who responded to our survey. When scaling up numbers in receipt of home-to-school transport, we split our survey respondents into

<sup>38</sup> As before, too small a sample size of local authorities provided a response on numbers of post-16 mainstream young people in receipt of transport. We felt forecasting off a sample size of 11 local authorities was unrepresentative of national trends and would therefore present a skewed picture.

rural and urban local authorities and calculated the numbers provided as a proportion of the rural/urban population. We then scaled this up to population size for rural and urban populations across 152 local authorities. We adopted this technique because 46% of our survey respondents were from rural counties – this compares to a national proportion of 28%, and therefore, we did not want numbers on transport in rural areas to skew our dataset on a national level. Considering the greater discretion a local authority has in interpreting the guidance for the provision of mainstream home-to-school transport, we have predicted that the greatest pressures will be found in SEND. Based on our survey (Figure 23), 84% of respondents were either not very confident or at all confident in their ability to balance SEND transport budgets for the coming year and therefore, for pre-16 SEND, it is reasonable to assume that both numbers and spend will increase.

For pre-16 SEND, we are expecting to continue to see expenditure rising more quickly than the numbers of young people in receipt of transport. For example, we are predicting a 5% increase in numbers in receipt of pre-16 SEND transport but a 21% increase in money spent on SEND transport – in part driven by increasing unit price. For post-16 SEND, we have seen numbers stabilise and decrease since 2015-16. Therefore, we expect this trend to continue as local authorities tighten their offers to provide only for young people who otherwise would not be able to access education without transport provided by the local authority. Since we expect the remaining cohort of young people receiving transport to be only young people with complex needs who require costly transport arrangements, we expect spend to increase.

For mainstream, we expect numbers and spend to decrease both pre and post-16, with the drop off predicted to be much more considerable at post-16 as local authorities continue to reduce and tighten their offer to the statutory minimum. We have generated two predictions for pre-16 mainstream. Scenario 1 is based on linear regression analysis of historical trends which show numbers continue to fall. However, if we amend this based on field work and survey returns, we expect for the numbers to drop slightly in the next year as remaining authorities reduce their offer down to statutory minimum and then it will flatline as no further reductions can be made. In terms of predictions, given a degree of error, we would expect the future numbers mainstream transport recipients to be between these two scenarios.

These predictions are corroborated by responses to our survey questions around how local authorities anticipate mainstream and SEND home-to-school transport spending will evolve over the next five years. When considering trajectories for spend on SEND home-to-school transport, 84% of local authorities expected spending to increase. This is compared to only 43% of local authorities for mainstream home-to-school transport spend. Conversely, the bulk of local authorities (55%) anticipated that spending on mainstream home-to-school transport would remain relatively stable over the next five years. These sentiments back up what we heard from our field work and the broader data trends, and we have aimed to build these into our predictions.

These projections should be treated with considerable caution, however they suggest that, in total, the number of children and young people receiving home to school transport is likely to remain relatively stable over the next five years (between 520,000 and 550,000 depending on the extent to which mainstream numbers continue to fall or reach a plateau). However, due to a rising proportion of children and young people with SEND receiving transport, these projections suggest that expenditure on home-to-school transport may increase by £127 million over the next five years to £1.2 billion nationally, or by £183 million to £1.3 billion, if flatlining is assumed for pre-16 mainstream transport.

Figure 24 - Scaled and predicted numbers of children and young people on home-school transport by age and category (2015-2023)

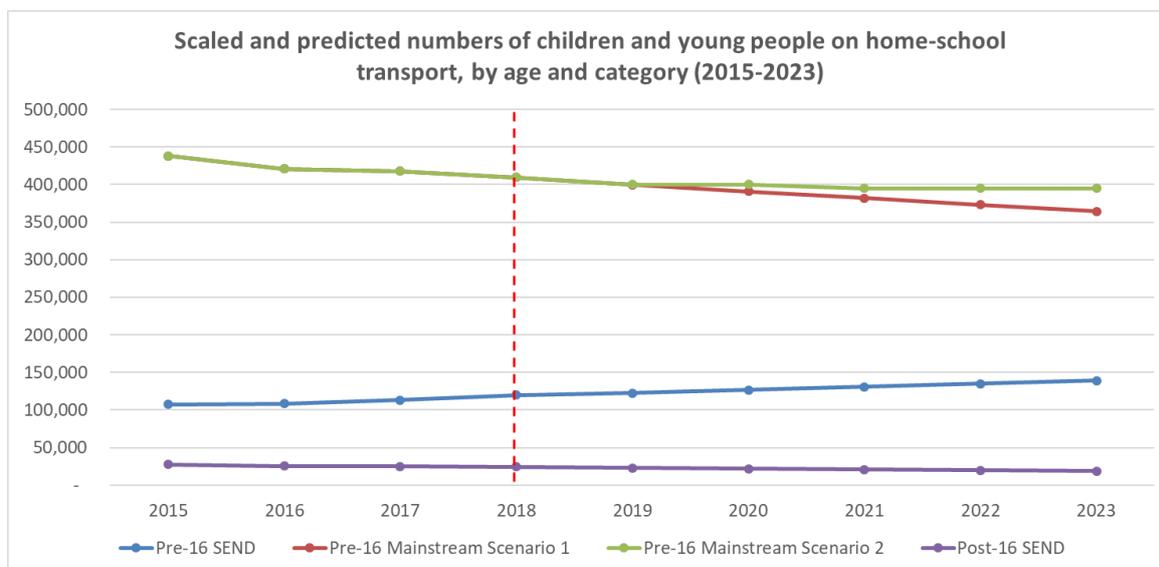
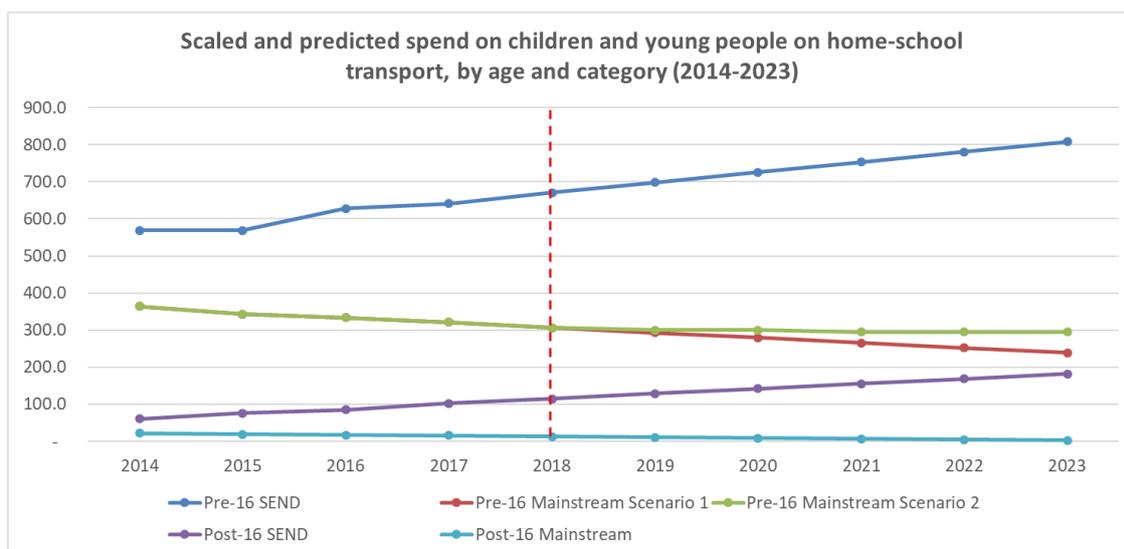


Figure 25 - Scaled and predicted spend on home-school transport by age and category (EMM, 2014-2023)



## Conclusion

In 2017/18 considerably more was spent by local government on transporting children to and from school than was spent on children’s centres, family support services or youth services. In some County Councils, where the costs of transporting are disproportionately high, their home-to-school transport budget is almost as big as their entire children’s social care budget.

The large majority of expenditure on home-to-school transport, and the element that is fuelling the increase in expenditure, comes from providing transport for children and young people with SEND. Increases in both the number of children requiring transport and the overall cost of provision are being driven by the rapidly growing number of children and young people with EHCPs, the increasing complexity of need and a critical shortage of places in special schools which mean that children need to be transported further to reach their nearest suitable school. Until some of the underlying policy and funding issues which are contributing the unprecedented rise in children with EHCPs are

addressed at a national level, the upwards trajectory for expenditure on home-to-school transport is likely to continue.

The very considerable spend in recent years on home-to-school transport comes with an opportunity cost. Home-to-school transport is funded from Council's core funding. Every pound that is spent on transport is a pound that could be spent on improving support to families, or intervening early with children at risk of neglect, or funding better access to educational psychologists for children with SEND. This is not to downplay the importance of providing safe, good quality transport to ensure that children can access their education provision, but at a time when Children's Services are facing critical funding shortages it is surely right to pause and reflect on whether the balance of responsibility for providing transport remains right in the current context in which local government is working. Arguably, the statutory responsibilities for transport were constructed for a different era and may now need to be redesigned. It is not clear that continuing to deliver home-to-school transport in the way it is done now will be financially sustainable going forward.

This report therefore suggests a number of recommendations for local government to continue to implement strategies that have potential to limit the increasing expenditure on home-to-school transport and for central government to reassess some of the core policies and statutory duties which underpin this area of local government responsibility.

## Recommendations

Local authorities, working with the Local Government Association should:

- Strongly promote the aspiration that children with SEND, wherever possible, should be educated successfully in their local school, and put in place the support for children, parents and schools to make that achievable.
- Establish clear strategic leadership across the multiple teams that contribute to SEND transport to ensure that placement and transport decisions are made together and that maximum value is achieved across combined budgets.
- Create the opportunities for a creative and mature dialogue with parents about transport options, with a presumption towards modes of transport that promote independence and reduce reliance on government-provided options.
- Find opportunities to share good practice in terms of decision-making and transport assessments, co-production of policies and guidance with parents, and creating a full and creative range of support options for travel to school.

National government should consider:

- Urgently reviewing the multiple policy and funding drivers which are contributing to the rapid rise in the number of children with EHCPs.
- Clarifying aspects of the home-to-school transport guidance which are ambiguous and contentious. Two key areas for greater clarity include transport responsibilities for children below statutory school age with a named provision on their EHCP and for post-16 provision. For post-16 guidance, if national government intends to continue to encourage post-16 transport policies to be set at local authority discretion, this level of discretion needs to be made consistent throughout the guidance and requires clarification across the different groups mentioned.
- Reflecting the disproportionate weight of expenditure on home to school transport borne by large rural local authorities in future local government funding arrangements.

- Fundamentally reconsidering the balance of parental and government responsibilities in providing transport to school. One option that might be considered would be to view home-to-school transport as a means-tested benefit rather than a universal entitlement for children who meet certain criteria. Under such a scheme, parents who have sufficient income could pay a pre-defined contribution towards the cost of locally provided transport or alternatively choose to make their own arrangements.

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# Primary Review Update

Children and Education Scrutiny Sub-Committee

February 2020



# Changes in the pupil population

- The average female resident is expected to have **1.39** children now, compared to **1.8** children ten years ago.
- Predictions for place planning have not been realised (**child yield**).
- Primary school pupil numbers have (broadly) **grown in the East but fallen in the West** of the borough.
- Secondary pupil numbers **continue to rise**.
- **Increasing complexity of need**.



# Why is the population changing?

- Rising rents and house prices: In 2017, the average house price in Tower Hamlets was £479,000 - around 13x the average household income
- Welfare reforms, such as the benefit cap, which have reduced incomes for families
- Properties which are vacant or otherwise not used as family homes (for example, Airbnb)
- Brexit – both developments and population/migration



# Roll projections for Reception

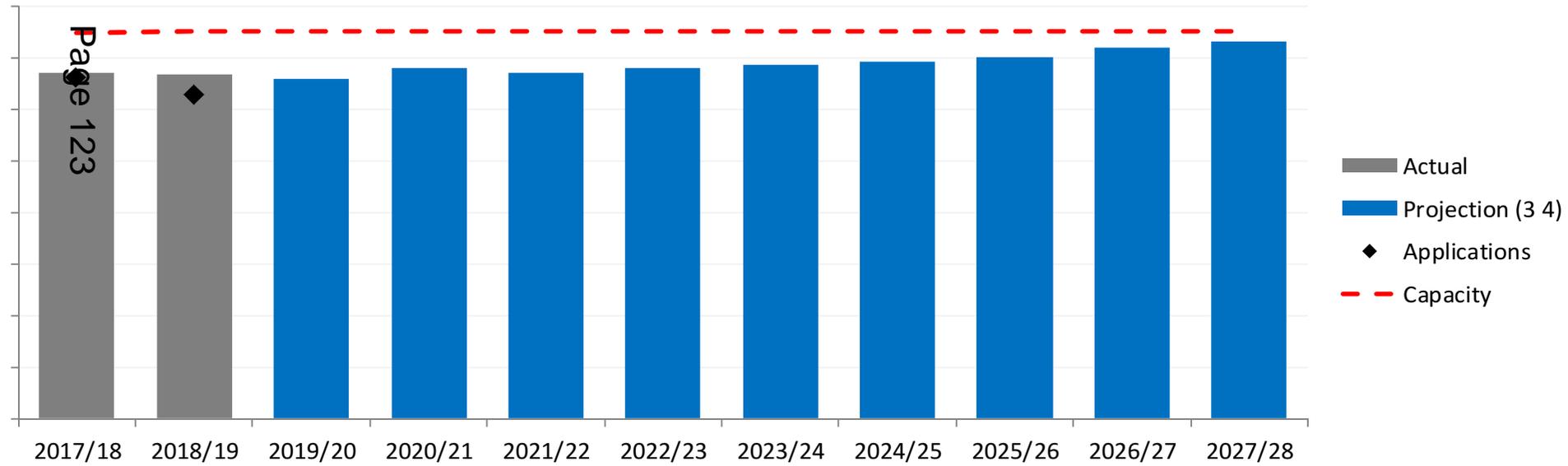
As of July 19 using: Jan 2019 school rolls, GLA 2016-based population projection model (UPC), and Local Plan + LLDC development trajectory, 3 4 option

gh

		2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
Population (3 4)		3,353	3,340									
Applications				3,299	3,403	3,364	3,398	3,436	3,469	3,512	3,606	3,658
Total		3,305	3,136									
Capacity		3,740	3,766	3,761	3,761	3,761	3,761	3,761	3,761	3,761	3,761	3,761
Percentage (3 4)	Pupils	387	426	462	358	397	363	325	292	249	155	103
	FE	12.9	14.2	15.4	11.9	13.2	12.1	10.8	9.7	8.3	5.2	3.4
	%	10%	11%	12%	10%	11%	10%	9%	8%	7%	4%	3%



## Reception projections: borough



# Primary Review

- Primary Review Group
- ‘Future Ambitions’ – maintaining and enhancing educational offer and quality.
- Over 300 surplus places in the West of the borough.

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“To address these challenges, we need to reduce provision initially by 6.5 forms of entry – equivalent to around 6 one form entry schools, or 3 two form entry schools. If the level of surplus provision continues to rise, there will be a need to reduce provision by up to 10FE by 2023. This will still allow a reasonable surplus for parental choice.”



# Progressing Ambitions

- There are no easy answers.
- Most proposals have been led by schools based on what works for their school community.
- Interesting question of: what makes a school?
- Current proposals would see a reduction of 260 (8.5FE) reception places in the West of the borough and the addition of 160 (5FE) reception places in the East of the Borough by 2025.



# Wapping

- Currently: 480 Reception places available.
- In January 2019: 62 (2FE) unfilled places.
- Projection: To rise to 92 (3FE) by 2027.

## Proposals:

- Reduce PAN of Canon Barnett School from 45 to 30
- Further work being done to develop a proposal for the future of Shapla Primary for consideration later this year.
- Further consideration will need to be given on proposals for Cannon Barnett, Osmani and Thomas Buxton after 2022.
- Expansion of Hermitage from 45 to 60 to provide specialist ASD provision in line with SEND strategy.



# Stepney

Currently: 840 Reception places available.  
In January 2019: 110 (4FE) unfilled places  
Projection: to rise to 141 (5FE) by 2027.

## Proposals:

- Amalgamation of Smithy Street and Redlands (and reduce overall number of places from 120 to 90). Currently undertaking statutory consultation.
- Reduce PAN for Cayley from 90 to 60 in 2021. Proposal to Cabinet.
- Amalgamation of Guardian Angels with St Anne's. Currently undertaking statutory consultation.
- Reduce PAN for Bangabandhu from 60 to 30 from 2021. Proposal to Cabinet.



# Bethnal Green

- Currently: 660 Reception places available
- In January 2019: 132 (4FE) unfilled places
- Projection: Surplus to continue through to 2027.

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Proposals:

- Following the Federation of Hague and Stewart Headlam Schools. This will include a reduction to the PAN of Stewart Headlam from 60 to 30. Proposal to Cabinet.
- Proposal being developed for the future of St Matthias for consideration later this year.
- Further consideration will need to be given on proposals for Elizabeth Selby Infant and Lawdale Junior Schools.



# Bow

- Currently: 450 Reception places available.
- In January 2019: 42 (1½FE) unfilled places
- Projection: To rise to 86 (3FE) by 2027.

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## Proposals:

- A reduction to the PAN of Malmesbury School from 75 to 60 from September 2021. Proposal to Cabinet.
- To reduce the PAN of Olga from 90 to 60 from 2021. Proposal to Cabinet.



# Poplar

- Currently: 890 Reception places available in the Poplar catchment area.
- January 2019: 44 (1½FE) unfilled places;
- Projection: With anticipated growth in the pupil population, this area is expected to have a shortfall of 122 places (4FE) by 2027.

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## Proposals:

- Increase to the PAN of Mayflower School from 45 to 60.
- To increase the PAN at St Saviour's CE School from 30 to 60.
- Exploring potential for expansion of other schools.



# Isle of Dogs

- Currently: 441 Reception places available.
- January 2019: 15 (0.5FE) unfilled places.
- Projection: With anticipated growth in the pupil population, this area is expected to have a shortfall of 156 places (6FE) by 2027.

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## Proposals:

- New 2FE (60) School at Wood Wharf from Sept 2022
- New 2FE School at Millharbour.
- Further work to be done to look at timescales for delivery of sites.



# Reflections

- Not uniform across the borough (or within catchment areas) – although some clear trends
- Proactive .v. reactive proposals
- An art or a science?
- Need to keep flexibility in the system
- Challenges to securing capital funding for changes and delivery of new sites
- Sustaining and enhancing the educational offer for the borough



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# **Future Ambitions**

Dr Helen Jenner  
Independent Consultant  
February 2019

## Future Ambitions

A report of consultancy work undertaken to support  
the Tower Hamlets Review of Primary Education

Dr Helen Jenner

January 2019

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## Introduction and ambition

This is an inspiring time for Tower Hamlets' educators. Previous education strategies have transformed the Borough from one which was failing many of its children to a place where children thrive in effective schools, built on models of entitlement for all.

Historically education strategies in Tower Hamlets focussed, rightly, on driving school improvement to tackle underachievement and the needs of disadvantaged minorities. More recently, the rights based model<sup>1</sup> in many schools has reflected the need for a step change in our strategic models for the future, recognising that changing circumstances nationally require renewed local planning<sup>2</sup>. This shift is essential to provide the ambition we need to ensure education in Tower Hamlets continues to match the needs of its changing population and to provide the learning opportunities that will support all our children to be able to become confident, responsible, local and global citizens.

The context for this work brings significant challenges – falling rolls in the West of the Borough, continued expansion of the City, rising house prices, major housing development plans in the East, reductions in educational and local government funding. Maintaining the same number of places and/or schools in the West of the Borough is not an option. There are not enough children to fill them and failure to tackle this would lead to a gradual decline in financial viability and the quality of education. It is already clear that schools feel in competition to recruit children. We know that, in Tower Hamlets, the way to tackle significant challenge is to focus collectively on outcomes for all children, we must not allow gradual decline because we lack the confidence to manage change. To do nothing to address these challenges is not an option. The Local Authority and its schools must therefore work collegiately to agree a way forward so that individual schools are not faced with the prospect of financial insolvency and inability to sustain educational excellence.

The challenge in the 1990s seemed daunting, some of our targets and aims seemed almost unachievable but we know that the quality of leadership in our Borough's schools as they work together for a common purpose is exceptional. That ambition for our children's future will enable Tower Hamlets to tackle rapid change without relinquishing any of our determination to empower our children for their future world.

This report details the work I have undertaken as an independent consultant to work with the Local Authority and the 16 schools identified by the Local Authority. It sets out some recommendations for first steps to enable schools to take the lead in addressing some of the changing needs in the Borough. Tower Hamlets officers were proactive and correct to undertake the review of primary schools in the West of Tower Hamlets, which set out the urgent need to address school place provision. They were innovative in setting up the Primary Review Advisory Group so that this work could become schools led. There is recognition of an urgent need to remodel schools to reduce school places in the West of the Borough, initially by around 6.5 forms of entry and up to 10FE by 2023. This work must continue to be done collectively if we are to avoid a scenario where individual schools have

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<sup>1</sup> UNICEF (2007)

<sup>2</sup> Isos Partnership (2017)

levels of vacancies that mean they are not financially able to sustain the highest quality education that we need for our children. The national funding formula and reductions in numbers of children eligible for free school meals mean that this work will be completed in a period of financial constraint. There are already several schools whose in-year budgets are unlikely to be achievable, and at least three who look likely to require licensed deficits from April 1<sup>st</sup> 2019.

To achieve the transformation needed whilst continuing to develop our ambition for children requires collective schools' leadership to consider the needs of our educational communities and to think beyond our traditional models of individual schools. Our education strategies need to be based on working together to create a revised approach to education in the Borough which recognises changing national and parental expectations, increased pressure to deliver value for money and very different pupil demography. Strategies that helped us move from being a Borough that failed to meet the needs of its disadvantaged children need to be reviewed to ensure we are able to manage the changes needed and continue the drive to ensure access to world class education for every child.

### What this report sets out to do

In writing this report I have tried to address the following:

- Provide a brief summary of the role and remit of The Primary Review Advisory Group (PRAG).
- Describe the work I have been doing with schools and the LA and the principles agreed.
- Provide illustrative examples of the levels of challenge some schools are facing and models of how this information might be summarised for each school and for educational communities.
- Explore a possible new localised model to support schools facing the need to reduce their capacity (or other educational challenges).
- Recommend a timetable for future work, building on the timetable already published by the LA.
- Identify principles for future work.
- Suggest approaches that may support the challenge ahead at Local Authority, educational community and individual school level.
- Make specific recommendations for how small clusters of schools should plan together to reduce the number of school places in their area and optimise their potential to deliver excellent education.

- Make suggestions for groups of schools that work across Borough communities (Faith schools, specialist SEN provision, MATs, Federations).
- Address a range of Frequently Asked Questions collected from my meetings with schools and PRAG discussions.

### Status of the Report

My work is part of a much larger project which started in Summer 2018 and will develop over time. I have therefore also made some suggestions about Borough-wide support that may be needed to support the immediate work and future strategic planning.

The recommendations in the report are from an individual and are not the Borough Strategy.

I hope that what I have learned from my amazing Tower Hamlets colleagues over the years, and in my 70+ meetings with schools and other stakeholders in the last few months is reflected in the report and helps give a direction of travel for work that is urgently needed as the Borough strategy continues to develop.

A draft of this report has been reviewed by PRAG, and it is now being shared with all school leaders for perusal and comment. These views will be considered by PRAG, who will then advise on the Local Authority's decision-making and consultation process.

## The role and remit of the Primary Review Advisory Group (PRAG)

In December 2017, the Local Authority wrote to key stakeholder groups to seek nominations for membership on the Primary Review Advisory Group (PRAG). These groups included the Primary and Secondary Phase Consultative groups, diocesan boards, the Council of Mosques, the Greater London Authority, the office of the Regional Schools Commissioner, and the early years sector. The role and remit of the PRAG was set out in the group's terms of reference as follows:

- to advise on the proposed conduct of the review of primary school places, including consultation arrangements and community engagement strategies;
- to oversee the timetable for and progress of the review;
- to advise on the suitability of non-statutory forms of school organisation to support the cost effective management of provision, as part of any wider statutory re-organisation proposal;
- to assist in reviewing options for change prior to the development of specific proposal for consideration by Cabinet;
- to contribute to the evaluation of the review process, post completion of the statutory implementation phase.

Following nominations, in February 2018, the Local Authority organised the first meeting of the PRAG where the membership and terms of reference were agreed.

A website has been set up as part of the Primary Review at:

[www.towerhamlets.gov.uk/primaryreview](http://www.towerhamlets.gov.uk/primaryreview)

This signposts to resources that have been developed, or are linked to the review and information about the PRAG, including the agendas and minutes of meetings.

The PRAG is an advisory group made up of key stakeholders. Its role is to ensure that decisions about school re-organisation taken at Local Authority, or Diocesan level, are well informed and considered, having taken account of the views of the PRAG.

In May 2018, the PRAG agreed evaluation criteria to help identify which schools should be considered to be "in scope" for further review of their future admissions and how best to respond to the changing demographic. Following data collection and LA analysis in June, PRAG confirmed 16 schools in the West of the Borough as part of the current review. In July I attended PRAG to help inform my work with individual schools, which started in September 2018. Since then (Nov 2018 and January 2019) I have been reporting to PRAG on the findings from my work, and using the group in an advisory capacity for direction of travel, and for feedback on approaches to schools and materials produced, including this report. The Head Teachers on the group include schools "in scope" and not, and represent the range of primary, nursery and SEN provision. They feed back to colleagues through the Headteachers' Consultative structures.

## Description of the work I (independent consultant) have been doing

As part of the work I have undertaken, I have reviewed a wide range of Local Authority, London and National data as well as examining schools' data, and the LA evaluation criteria.

I have collated a large number of relevant publications, including the national statutory guidance, helpful guidance from a range of organisations and studied relevant school and systems leadership materials.

I have visited all 16 schools at least once, frequently more often and had a minimum of two meetings with each school's leaders. I have met with both Diocese and Local Authority officers, and attended the Primary Headteachers' Consultative, the Director's Briefing for Governors and the Annual Governors Conference. Between September and January I have attended over 70 meetings.

During the Autumn Term I worked with each Headteacher to consider their view of schools' current situations and possible ways to address the current challenges. For those schools who have more clearly identified future proposals I am also working with Chairs of Governors, to start to develop planning, processes and potential timetables. At each school a "Securing Sustainability" template<sup>3</sup> was completed and agreed with each school. This was shared with Headteachers and Chairs of Governors.

During January, I have revisited schools to feed back on the Autumn Term and to put to them my current view and recommendations for ways forward. Working together on these recommendations will help schools to develop firm proposals that need to be established for July, so that wider consultation can begin in the Autumn Term, to inform Cabinet decisions on any statutory notice periods in the Autumn 2019. I have also drafted this report, an early version of which was circulated to PRAG and Headteachers at "in-scope" schools (who were invited to share the report with Chairs of Governors) and refined it following feedback from individuals and the PRAG.

As part of my work since September I have kept a risks and concerns log which has led to the FAQs appendix<sup>4</sup> which considers each aspect raised and references where this is addressed in my recommendations for future work.

In working with schools it also became clear that a range of templates and references to support materials would be helpful, these are gradually being added to the Primary Review website. This will include: a template presentation for governors, a model amalgamation guidance, and a template for high level zero based budget modelling. As new tools are developed they will be added to the website, alongside links to work done in other Authorities and national guidance.

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<sup>3</sup> Circulated with The Director's Report for Governors January 2019, and available on the Primary Review website.

<sup>4</sup> Appendix 3

## Illustrative examples of the levels of challenges faced

One of the challenges for the Primary Review is creating sufficient space for schools to explore possibilities and probabilities without unnecessary anxiety and with as little rumour as possible.

In order to illustrate the level of challenge some schools are facing, and to help explore ideas for ways forward, I have invented three schools – Peacock, Sparrow and Robin Schools – which illustrate the types of challenges being faced across the Borough, and models for ways forward.

This has allowed other colleagues to understand the types of challenges that need to be addressed, and the processes that will be used to address them without compromising confidentiality for individual schools whilst ideas are considered. Individual proposals will be developed during the Summer Term with publication and public consultation in the Autumn Term.

As the next section of this report makes clear, I do not believe that schools can work in isolation to resolve the significant challenge we face, so the three illustrative schools are described as working together to become The Birds Educational Community.

A pen portrait of Peacock School is attached as Appendix 1.

A recommendation report for an educational community (Bird Community) is attached as Appendix 2.

Further materials such as a guide on amalgamation for governors, and a future proposal document are being developed to help support schools through the next processes as we work towards proposals that will deliver a reduction of at least 6 forms of entry. These will all be available on the PRAG website.

## A new localised model to tackle the challenge

To make the best use of the school estates, it is important to look across all schools in an area, rather than at each school individually. In working with our primary schools it has become increasingly clear that school intakes overlap from the same geographic area – with many children walking past one school to go to another which, sometimes, they perceive to be “better”, or attend because of a friendly neighbour’s advice. Whilst there was, fifteen years ago, great variability in the quality of education across our schools this has been significantly reduced, with OFSTED judging 98.6% of primary schools good and better. Variations in outcomes between schools remain and all schools benefit from the support of the Tower Hamlets Education Partnership (THEP), which aims to ensure outcomes continue to improve. There are effective THEP strategies to quickly identify and respond to any significant weaknesses through THEP consultants and school-to-school support. Whilst parental choice remains important, it should no longer be driven by the need parents felt, historically, to avoid failing schools.

Although falling pupil numbers have hit some schools harder than others (particularly those that are one form entry) frequently numbers in an area are down in several schools. It is only by working together that those schools can find “whole” forms of entry. For example – three one form entry schools may each be down by ten pupils. It would be very difficult for each school to cut 1/3 of a class – they would still need to maintain 3 classes. By working across the 3 schools a whole class can be cut and the cost reductions shared across the schools.

Particularly for Primary Schools, where parents expect proximity to their home, these partnerships need to be close geographically to maximise the potential benefits of joint working. It is also important that the units are small enough to understand and plan for their community, knowing the children and families and the potential of the schools’ joint sites and teaching expertise. Planning across schools in this way maintains ambition whilst tackling the falling rolls problem and addresses some of the challenges there are with older school buildings – for example location, state of the building fabric, and lack of play space. Working in this way will mean that some school sites are not required as schools. Careful planning will be needed to maximise the benefits to local communities.

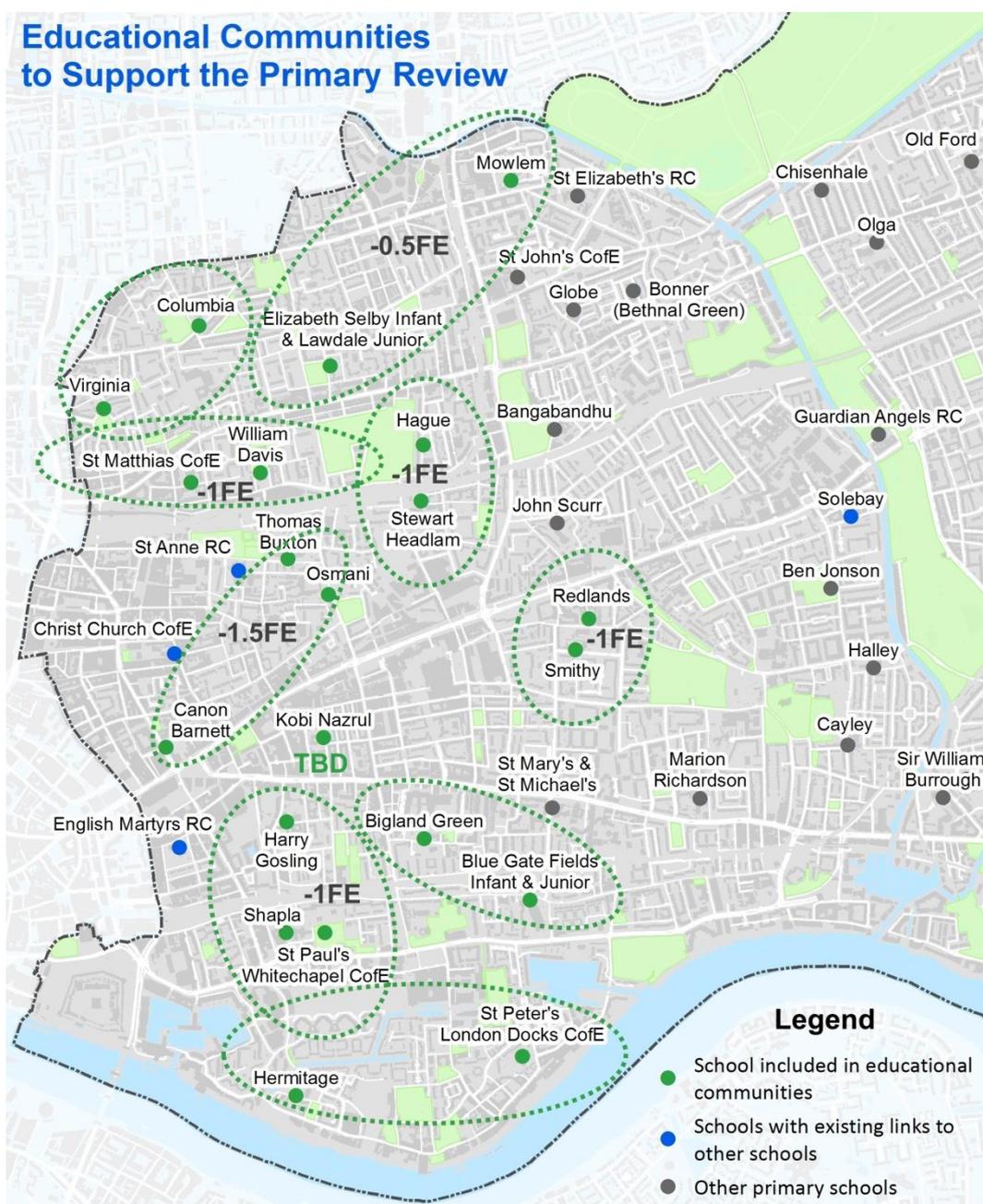
### Educational Communities Recommendation

I am proposing that Schools should work together in groups of around 3-5 forms of entry to review finances, sites and educational expertise to ensure they are optimising educational value for their communities. These groupings are based around the natural geographical divisions in the Borough and would be called “educational communities”.

## Map of recommended educational community clusters

The map below shows the proposed education community clusters and the recommended reductions of forms of entry (FE) within these clusters. Where ellipses overlap this indicates potential for extending educational communities, if needed in the future. Not all the schools identified in these educational community clusters were included as schools in scope, but they are close neighbours of in scope schools. These schools will therefore be given the opportunity to be part of the discussion for the school organisation changes going forward. Other schools across the Borough may also like to consider this approach.

A number of other schools, not in the West of the Borough, have been considering how they work together for the good of their communities. In some cases schools are linking across the Borough (for example Catholic Schools work in partnership to serve the needs of the Catholic community; schools in MATS or Hard Federations frequently share staff).



These proposed education community clusters may require one or more of the following school organisation changes:

- A **'hard' federation** is where two or more maintained schools come together under one governing body. The federated schools retain their individual identities, but may share a budget and be led by an executive headteacher. This arrangement would enable schools to more easily share resources, staff, expertise and facilities in order to improve sustainability and the educational offer across the federation.
- An **amalgamation** would bring together two (or more) maintained schools as one single school, located on the same site and under the same leadership and governance arrangements. Amalgamation would reduce the number of surplus places in the area and ensure that the resulting school would have a stronger pupil roll and improved sustainability. This change would result in one or more schools closing to create an amalgamated school.
- **Relocation** of an existing school into a new school site in an area where there is an increasing demand for school places. This would mean an existing school could retain its staff and other key resources to provide continuity of existing high quality provision, serving a new community in Tower Hamlets. Relocations would also reduce the number of surplus places in the schools existing community, and help to strengthen the rolls at other schools.

## Recommended future timetable

### Phase 1: August 2018 – February 2019

- Independent Consultant works with school leaders to develop proposals for changes to school organisation.
- Recommendations report considered by PRAG and in-scope schools January 2019. Report published online mid-February 2019 inviting feedback from school leaders by 5<sup>th</sup> April 2019.



### Phase 2: March – July 2019

Following consultation with school leaders, 'educational community' area-led consultation on the recommendations in the consultant's report.

Localised school led work to :

- Ensure governors have transparent understanding of the challenges;
- Refine solutions work in educational community school groups involving key stakeholders;
- Reach firm, specific educational community proposals; work with the independent consultant, which address the principles established by PRAG; and identify financial challenges and solutions by the end of July;
- Develop implementation plans with schools and the Local Authority.



### Phase 3A: September – November 2019

- Report to Cabinet in Autumn 2019 with recommendations for statutory consultation on proposed changes. This will include feedback from the consultation on the school-led models and recommendations for the LA to issue Statutory Notices for any schools amalgamations or closures
- Admissions Forum to review any proposed admissions alterations prior to statutory consultation.
- Schools continue to progress joint working, planning and analysis



### Phase 3B: 1<sup>st</sup> November 2019 – 6<sup>th</sup> January 2020

- Statutory consultation on school organisation changes and school admissions for the 2021/22 school year, including the publication of any statutory notices. In some cases, the statutory consultation will allow for certain school organisation changes **to take effect from September 2020**.
- Schools develop refined implementation plans.



### Phase 4: February 2020

- Report to Cabinet on school admissions. This will include the outcome of the statutory consultation and recommendations for Cabinet decisions on changes to school organisation.

## Principles and recommendations for future work

Following my meetings with schools I identified a number of principles that will support planning to reduce school places in the West of Tower Hamlets.

**PRAG agreed the following principles (January 2019) for this report:**

- 1. We must provide world class education, fit for the future**
- 2. We must retain skilled staff**
- 3. We must ensure a model of school sustainability that includes resilient and agile financial management and governance**
- 4. We must use the opportunity to improve sites and premises**
- 5. We must maximise resources between schools to reduce transitions, maximise value for money and increase opportunities for children and staff**
- 6. We must ensure a balance of provision across the Borough that matches local need**

**These principles have been used to consider the priorities the work for the Review must address.**

The following sections consider which principle should be considered and actions that will be needed to support this principle at Educational Community and Local Authority Level.

### Schools/Educational Communities Level

#### **1. We must provide world class education, fit for the future**

Plans should be ambitious and lead to an improved educational offer. Where this is difficult the least possible disruption should affect the fewest possible children.

Separate phase schools should review whether all through provision would enhance the education experience. Separate Infant and Junior Schools should amalgamate. The potential to develop 3-16 provision should be explored.

High quality early years provision is essential for our children to flourish. If considering taking in younger children advice must be sought from the early years team about adaptations needed, and financial models and the very different needs of two year olds carefully considered. Funding for early years has changed significantly and all schools need to remodel the financial commitments, and their implications, carefully.

Tower Hamlets is an inclusive authority, our school planning must ensure the needs of all children are met through thorough accessibility planning.

## **2. We must retain skilled staff**

Managing change must be handled sensitively to ensure we retain excellent staff.

Staff need to be aware of the additional opportunities for development that change and ambition bring. School leaders have a key role in supporting this.

School leaders should be trained in systems leadership skills to manage change and new ways of working.

## **3. We must ensure a model of school sustainability that includes resilient and agile financial management and governance**

Schools with adjoining buildings or playgrounds, or in close proximity should share resources whenever possible.

½ forms of entry are not cost effective and are particularly challenging under the new National Curriculum requirement.

One form of entry schools, in the Tower Hamlets context of the need for flexibility and high mobility, are unlikely to be independently financially sustainable. They should consider partnerships with other schools to manage financial planning.

Plans should recognise that enrolment trends are subject to demographic change, and schools should be prepared for further reduction in numbers in some areas, and variability in the speed with which intake numbers change/increase. In deciding to retain particular buildings the financial burden of doing so with lower pupil numbers should be carefully planned and costed (including PFI costs).

Additional childcare and early years provision should only be developed where it fits with the Local Authority Childcare Sufficiency Assessment, to ensure viability.

## **4. Improvement to sites and premises**

The accessibility of buildings and inclusion of the full range of needs in the community must be included in future plans. There is too much variability in the capacity of mainstream schools to meet the diverse needs of their communities. This is leading to pressure on the High Needs Funding Block, and the imbalances in meeting individual needs across the Borough. The Tower Hamlets SEND Strategy must be considered when reviewing provision.

Not all schools have sufficient play space and not all parts of the Borough have sufficient green spaces. Plans should consider these needs alongside curriculum needs when reviewing suitability of current provision.

Air pollution levels vary considerably between schools. As well as continuing work to reduce pollution (walking to school models, etc.) groups of schools should consider these levels when reviewing different sites.

**5. We must maximise resources between schools to reduce transitions, maximise value for money and increase opportunities for children and staff**

Around 250 children in the Borough still have to apply for Junior School places because Infant and Junior Schools on the same site are still working separately. Governors must review whether this remains appropriate. Early Years, Infant and Junior specialist expertise does not need to be lost as is evident in many Primary Schools. In addition, new opportunities are created for staff and the staff team develops a more thorough understanding of children's past and future experiences.

Neighbouring schools frequently have different resources which are not always shared. These include climbing walls, forest school spaces, sensory rooms as well as book and classroom resources and staff expertise. These resources should be shared across phases.

**6. We must ensure a balance of provision across the Borough that matches local need**

It is essential that places are developed in the East of the Borough and reduced in the West. Previous strategies such as bussing children are no longer affordable and are not an effective use of education monies.

In addition, the SEND Review is looking at access to suitable education, as close to children's homes as possible, to maximise value for money in spending from the High Needs Funding Block. There remains too much variability in the percentages of children with EHC plans, and/or special educational needs between schools with very similar catchment areas.

In reviewing provision we should take into account the current parental choice options and endeavour not to reduce access to faith schools, or to significantly increase walking distances to schools.

When proposing changes to their own provision, schools should consider the potential impact on other local providers, so as not to create an imbalance of provision and/or undermine the sustainability of other schools.

**Local Authority Level**

**1. We must provide world class education, fit for the future**

The LA should continue its work to move towards school-led planning as it develops its Commissioner relationship with schools.

The LA and Schools should have an ambitious, shared Education Strategy.

The LA, in consultation with schools and other key stakeholders, should develop a School Organisation Plan that sets out its strategy and approach to pupil place planning, and is as open and transparent as possible when considering school organisation changes.

## **2. We must retain skilled staff**

To ensure skilled staff are retained and keen to stay, a redeployment strategy, with positive vision for career development, and personal support, should be in place across the LA.

Terms of reference and roles for all education strategic decision making or advisory groups should be clearly understood by volunteers/representatives and their appointing bodies. PRAG should review its size and membership and consider the role of governors. The links between the Admissions Forum and PRAG could be developed.

As with school leaders, LA managers must have change management skills, and understand the emotional and practical impacts of change for schools and LA officers.

The LA should consider how it can communicate the benefits of working in any school in Tower Hamlets, to ensure the Borough continues to be a sought after place to work. If possible, this should include key worker housing.

## **3. We must ensure a model of school sustainability that includes resilient and agile financial management and governance**

LA officer recommendations and advice should follow the principles listed above. All staff linked with the proposals to receive training on these, and should be familiar with the key Primary Review documents.

The schools and LA need to ensure expertise and experience is shared to ensure all schools have access to support and training.

## **4. We must use the opportunity to improve sites and premises**

Educational land should generally be kept for that purpose as part of the legacy for the children of Tower Hamlets.

LA (or other site owners) sale of educational land should only be considered where:

- a)** The school site and/or buildings are no longer suitable as educational venues;  
*AND EITHER*
- b)** Funds raised will clearly support the improvement of education provision elsewhere in the Borough  
*AND/OR*
- c)** The proposed development enhances community provision (for example providing key worker flats, increasing the amount of green space)

New schools should, where possible, be designed with sufficient play space and low air pollution. Overlooking, particularly from residential properties, should be avoided.

**5. We must maximise resources between schools to reduce transitions, maximise value for money and increase opportunities for children and staff**

The LA should continue to work with schools to develop the links between education strategies. The Primary Review should link closely with Childcare Sufficiency and SEND planning. Developments in secondary and Post 16 provision should link with the principles for Borough continuity.

**6. We must ensure a balance of provision across the Borough that matches local need**

The LA has a duty to ensure that, as far as possible, provision matches local needs. It should therefore continue to be proactive in addressing this by taking early action to reduce provision when there is a significant surplus and decline in demand, which is likely to be permanent. The LA should also create new provision where there is a shortfall of places and evidence of increasing need, as this ensures all children have access to a high quality local school place. In taking such action, it will be necessary for the LA to consider a range of school organisation changes, including school federations, amalgamations, and relocations. These organisational changes may sometimes require individual school closures.

**Educational site owners**

The Borough (and Diocese) will need to decide whether the sites should be kept or their use changed. In reaching those decisions it will be important to remember that communities will consider that they are giving up their school and will want to be assured that the plans show benefits and improvements to the education and wider community. If sites are being sold the benefits should be for the Tower Hamlets educational and wider community, with a commitment to providing improved provision for the children and families directly affected. If they are not being sold their use should be developed either to enhance the limited play space available for children or increasing the very limited green space in the area (see principles).

Any site sold for housing development should seek to guarantee the inclusion of flats for teachers and affordable housing.

Local communities will not react well if there is not transparency about how any finances generated are spent, or if they are not used for the benefit of our young people.

Where school buildings/sites remain fit for purpose for world class education, but school finances are insufficient to maintain them, alternatives, such as co-location must be considered before disposal.

## Suggested approaches that may support the challenge ahead at local authority, educational community and individual school level

### **1. We must provide world class education, fit for the future**

Further develop the schools-led approach to future strategic planning across the Borough.

Trial the educational communities model with the schools in the West of the Borough, to establish whether it would be helpful for wider work.

Establish Educational Community Groups to establish 2/3 reps from each school (typically HT/Chair +1) to come together as a working party to look at possibilities and issues, and ensure any transition plans are delivered. In order to do the detailed work the group needs to be small enough to communicate well and must have balanced representation from the schools involved.

Develop a revised Borough wide education strategy, including consideration of whether our curriculum planning is ambitious enough for changing expectations of world class provision. This report includes some strategic principles which should be included in a Borough wide strategy. A schools-led, and LA-owned, strategy with a vision for what needs to be achieved for world class education over the next 5 years. This would support local and Borough wide decision making, and help all stakeholders to understand the reasons for those decisions.

Utilise existing curriculum materials that support transition and preparation for change, to help children celebrate the past and welcome the future.

### **2. We must retain skilled staff**

Develop a Borough wide redeployment strategy celebrating existing expertise and highlighting the opportunities for redeployment. All schools to be asked to consider staff from in-scope schools, who meet the selection criteria, before external advert (apart from Headship and Deputy Headship).

Work with Unions and HR teams to support skilled, experienced staff facing change to ensure expertise is not lost to the Borough, and the positive opportunities from redeployment and re-organisation are recognised.

The Borough should also take this and other opportunities to provide staff with professional development and career progression routes to enhance the current leadership strength in our schools.

Build on successful THEP model and existing partnerships to ensure school improvement and high standards are maintained during a period of transformational change.

Develop transitional planning training for school leadership and staff through THEP.

Ensure HR capacity, and links with Unions, to advise and support any staff who may be at

risk in the schools in scope.

Consider how staff in schools already identified as “in scope” would be affected by any changes in the current LA consultation on changes to benefits and terms and conditions for LA staff, including around severance pay and early retirement.

### **3. We must ensure a model of school sustainability that includes resilient and agile financial management and governance**

Consider expanding THEP model to support schools company type approaches to shared roles (e.g. Bursars/Counsellors/Family Outreach/Clerking/SENCO/School Keeper) and joint training.

Consider an Invest to Save Proposal / resources to ensure there is additional capacity to deliver transformational change. This should include:

- Project planning
- HR
- Finance
- Recognising that time scales mean real challenges for schools who are already close to deficit
- Clear strategy needed on how deficits in any closing schools will be managed
- Develop system to manage schools in in-year deficit
- Strengthen school governance where it has failed to manage school budgets

Provide training and support for school staff and governors to develop zero-based budgeting models for 1, 3 and 5 year planning.

Continue to build on cross-borough communications strategy – Heads Consultative, Director’s Briefing for Governors, Admissions Forum, PRAG etc. are well-embedded and effective mechanisms for engaging stakeholders and developing ambitious strategies. The transparency of document sharing from these groups and Heads’ and governors’ understanding of how they can feed into them through their representation could be refined. All groups should have clear Terms of Reference that are fully understood by volunteer/elected members and any electing bodies.

Strengthen training for Governors and opportunities for closer support for particular roles. Ensure governors are aware of local National Leaders of Governance (NLGs).

Consider developing specific Tower Hamlets criteria for use when school governance reviews are undertaken.

Work with EBP/Governor Services/local NLGs to establish a group of independent volunteer governor facilitators who would chair working group meetings when governors from two or more schools come together, or could offer support if school governors request it, or LA is concerned intervention may be necessary in future.

#### **4. We must use the opportunity to improve sites and premises**

Explore the potential for additional funding to facilitate building works required to ensure the relocation of school in advance of the receipt of monies from land sales.

Consider the implications of PFI contracts for any schools that might be recommended for closure before 2028.

#### **5. We must maximise resources between schools to reduce transitions, maximise value for money and increase opportunities for children and staff**

Establish shared tools (as they are developed) to be included on the Primary Review website: [www.towerhamlets.gov.uk/primaryreview](http://www.towerhamlets.gov.uk/primaryreview). Additional materials could include:

- Programme Planning
- Site Review
- Staffing Expertise
- Resources
- Amalgamation Planning Guidance

#### **6. We must ensure a balance of provision across the Borough that matches local**

Build on the Primary Review and continue to regular review of admissions numbers to ensure future changes in population need are swiftly addressed and responded to. Provide an annual review for the pupil place planning strategy and School Organisation Plan, and include feedback to all key stakeholder groups.

### **Specific recommendations for educational communities**

Schools identified in localised educational community groups need to plan together to reduce the number of school places in their area and optimise their potential to deliver excellent education. There are a number of possible school organisation changes which could help to achieve these aims: hard federations, amalgamations, school relocations, or school closures.

Individual schools have all been considering how best they can meet the challenges. I have provided a draft pen portrait briefing for each school, or group of schools (where the group have already agreed to this approach). These documents are working documents and are confidential to the schools. They include feedback from the schools on their view of my current recommendations. Appendix 1 provides a model example for the “Peacock School” and Appendix 2 is an example of the “Bird Community”.

During March – July I strongly recommend that these documents are shared between educational communities alongside an educational community recommendation sheet for each group from myself (see Appendix 2 for an example of specific community

recommendations for “The Birds Community”) which could be used as the basis for working towards schools-led proposals by July 2019.

Where schools have requested it, some of this work is already underway. In some cases schools have taken ownership of the agenda to work towards Hard Federations and amalgamations to sustain future working. I recommend that where governors have worked through appropriate processes, the timescale for implementing governance changes should be that proposed by the school.

### **Suggestions for groups of schools that work across Borough communities (faith schools, specialist SEN provision, MATs, Hard Federations)**

The Church of England (C of E) and Catholic Dioceses and The Paradigm Trust, with schools affected by the Review, have worked positively with me to explore the available options.

They have identified the need for work across their schools in the Borough, alongside the schools’ local roles, and engaged their schools in strategic decision making. This has enabled recognition of the Catholic Diocesan role in supporting Catholic communities across the Borough, and the C of E Diocesan role in ensuring that a geographical spread of C of E schools allows them to contribute fully to local communities.

I recommend that the work ensuring Diocesan and MAT leaderships are fully involved in the development of models should continue.

### **Specialist Provision**

This will be developed through the SEND Strategy. It is important that in each consideration an inclusive approach to meeting needs is reviewed. There are surprising variations between the percentage of children with EHC plans in individual schools, which are not easily explained by physical accessibility.

The SEND Strategy sets out positive ways forward to address the Borough challenges, including approaches which are designed to reduce the financial pressure on the High Needs Funding Block. Any educational community recommendation to enhance inclusive provision should be agreed with the SEND team.

### **Hard Federations**

Previously these have mainly been for school improvement reasons; new models need to recognise equals coming together to enhance affordability of excellent models.

Hard federations offer greater value for money if close together so that staff travel time is minimised, and space and resources available can be used by pupils from more than 1 school.

However, it must be recognised that there are strong reasons for Partnerships across the LA. Where these exist (e.g. MATs, faith schools, nurseries, special schools) it is important that leaders’ contribution to their local community should also be recognised.

Where hard federations already exist now may be a good time to review whether those federations remain the most appropriate way of meeting need.

## Appendix 1 – Peacock School

Early Draft - Confidential

### **Summary Note Peacock School**

#### **Educational Provision**

Peacock is a 1FE, good school where “the leadership team has defined a strong, clear direction for the school” OFSTED 2017.

At Foundation Stage, outcomes in the school are well above Borough averages, at the end of Key Stage 1 they are slightly above, although at Key Stage 2 outcomes show children have not achieved Borough averages for RWM (64% cf. 71%)

Staff report that the children are very happy at the school and they are proud of what they achieve.

#### **Setting**

Situated in the Forest area, the school is next to a small set of shops which are mostly closed and backs on to the Railway line, with Woodpecker Road directly in front of it.

Parts of the immediate area are currently being decanted and major development work is expected to take place in the next few years, this is expected to be owner-occupied flats.

The school are concerned that most of the children who choose their school are being moved into temporary accommodation and timescales, and any guarantees about return, have not been given. They are hopeful that parents will want their children and younger siblings to continue to come to the school because the decant is theoretically temporary, and that the planned housing development will yield more children in future.

It is my view that given the need and cost of local housing it is highly likely that families will be offered alternative social housing in the East of the Borough as it is built, or even further afield, because rents in the new build will be unaffordable. The design of the proposed flats, and the cost, is unlikely to yield large numbers of children.

The current site, between the railway and the road and next to boarded up shops does not provide children with a healthy environment, despite the fantastic play ground to one side of the school which incorporates an outdoor classroom and garden pond.

## Building Condition

The three storey building has been well maintained, but does suffer from damp. The roof regularly needs repair and given its age may need replacement soon. Playground space is significant, and there are 3 halls.

The school is not in a PFI contract.

## Finances

Peacock School does not have 3 and 5 year financial plans in place. This year's budget was built around last year's with two TA positions removed to reduce costs. The budget does not balance in year, but there was a reserve budget of £90,000. The school expects to end this year with a total overspend of around £30,000.

The funding formula changes, and falling rolls mean that next year's budget has been reduced by £60,000. The Headteacher is developing radical models to try to develop a deliverable in year balance for next year. Funding to the school will continue to decline whilst the full classes at the oldest end of the school move on to secondary provision, and smaller age groups move through the school. Even if reception numbers increase next year, there will be significant falls in total budget for a minimum of 4 more years.

The percentage of pupils entitled to Free School Meals is also falling.

## Admissions

Intake has not matched PAN (30 places) for 8 years, and last year fell to 12 children. Over the last year numbers have fallen at Peacock School, in all infant year groups, it remains stable in the junior classes. This happened the last time children were decanted (about 30 years ago when the flats were refurbished). Leadership is hopeful that when the building work is done the decline in pupil numbers will reverse. The Local Authority is of the view that this is unlikely.

Local Authority projections indicate that, with a declining pupil population in the area, an increase in admissions is extremely unlikely. This will impact directly on the school's budget position, and therefore its financial sustainability is likely to deteriorate further over the coming years. In the recent round of admissions, 9 children have expressed a first preference for Peacock School.

## Intake and Neighbouring Provision

Sparrow School (3FE) is 0.3 miles from Peacock School, a further three Tower Hamlets (Robin, Swallow and Wren) schools are within half a mile walking distance from the school and Surprise C of E School (oversubscribed 2 FE in Hackney) is just over 0.6 miles away.

## Recommendations

### Short Term

I recommend that the school urgently begins planning to work with Sparrow School, which has also seen a fall in numbers (42 in Reception this year, 38 applicants at present for next year), and that consultation be undertaken so that no further Reception pupils are admitted to Peacock School after September 2020. Peacock School and Sparrow School work in partnership towards being one school on the Sparrow site, with the Peacock School site closing formally from September 2021. As Sparrow School only recently expanded to 3FE, there are spare classrooms available.

The leadership of the two schools should work together to see whether some immediate co-location could be arranged to save costs whilst consultation processes are underway. The school urgently needs to develop further expertise in financial modelling.

### Longer Term

Longer term proposals should result in a strong offer at Sparrow School, particularly if the playground can be extended. If the local decanting continues Sparrow School may struggle, even with the additional Peacock Children. I would therefore recommend that Robin School (2FE) are part of the educational community group. It is my view that working collectively across the 3 schools would provide the best possible long term educational provision in this area.

The school leadership and governing body are not in favour of this recommendation. They would prefer to wait until timescales for building work are clear to see whether they can find a way to maintain their small, family friendly school, or to be able to move with their children to a new site.

## Appendix 2 – Building Educational Communities

### Educational Provision – The Birds Community

Peacock (1FE), Sparrow (3FE) and Robin Schools (2FE) are located to the West of the Borough, North of Bethnal Green Road. Peacock and Robin Schools are the furthest apart (0.4 miles). All three schools are good or better.

Peacock and Sparrow Schools have spaces in all year groups but vacancies are particularly high in reception, with 50 vacant places across the 2 schools. Robin School currently has three reception vacancies.

There is an immediate need to reduce the PAN across the schools by 2FE. It is difficult to predict how quickly rolls will fall further, as the redevelopment work programme is frequently changed and the Crossrail delays are impacting on the availability of land.

I recommend that the 3 schools work together with the LA, to consider the educational needs of the Community.

Key issues to consider:

- Feasibility of closing one of the schools
- Feasibility of land swop to allow Sparrow School playground to be increased, offering developers the Peacock playground to replace development land that is adjacent to the Sparrow playground.
- The development of a transition plan, with key points for co-ordinated communication across the educational community, to include a review of pupil numbers in 2020, in case a further reduction is required across the 3 schools.
- An analysis of teacher expertise to maximise support potential between schools.
- An analysis of the building and other resources to develop the best possible opportunities (for example Robin School has a forest classroom, Sparrow has a climbing wall; both schools have under-used wrap around provision. Robin has just started 2 year old provision, Peacock are asking whether they can do the same. There is an OFSTED “good” PVI Nursery nearby which has a few vacancies).

I recommend that this work is initially undertaken by Heads and Deputies from the 3 schools, with an independent facilitator and that a working group of 9 is established – to include the Chair, Head and 1 more from each school. They may decide an independent Chair is helpful. They should initially meet as necessary to refine plans and reach firm proposals that can form the basis for formal consultation by July 2019. During this time, I (or an LA representative) would support the schools by providing feedback on the match between their plans and the expectations set out in the Future Ambitions Report, and detailed in individual pen portraits provided to the schools, as well as the LA’s place planning strategy.

## Appendix 3 – Frequently Asked Questions

### Children

#### **How do we maintain a quality educational offer whilst going through a period of change?**

Tower Hamlets, and the rest of London, will continue to experience demographic changes, for example due to falling birth rates, housing affordability, welfare reform and Brexit. This will mean that pupil rolls will rise and fall. School organisation will therefore be affected as the Local Authority and its schools respond to manage the changing needs of local communities. Without a planned and coordinated approach, individual schools would be faced with the prospect of financial challenges that would mean they would be unable to sustain educational excellence.

The LA, Headteachers and Governors all agree that prioritising the quality of education is crucial to the success of any educational change programme. The Tower Hamlets Education Partnership will support schools to maintain a focus on educational outcomes, and a range of templates will be available to support schools working through change processes.

#### **How do we ensure that moving school does not impact negatively on children's attendance?**

Any final proposals considered by Cabinet will ensure that children are still able to access a local school place. This is why the proposal is for educational community groupings. Where parents may wish to move their children to an alternative faith school, no one will be asked to travel more than a mile, and travel plans will be provided.

#### **How will we support children that have to move school to see this as a positive experience?**

The timescale for any changes has been set to allow time for work on transition. There is significant experience in Primary Schools for transition planning when children move to secondary school. Celebrating the past and planning for future change should be built into the curriculum.

## Headteachers & Schools

### **How will Headteachers, who already have stressful jobs, be supported through the emotionally challenging process of shifting from a focus on maintaining their school to plan for their future educational community?**

Strong support for Headteachers is available through the local partnerships they have already established and through their Unions. The stress they face is not underestimated, but neither is their skill in working collegiately for Tower Hamlets children. The Primary Review is supporting school leaders to own the challenges and see positive ways forward as an essential part of addressing stress. The Local Authority will ensure that support is provided to Headteachers as quickly as possible.

### **How can Headteachers best support a positive vision for the future?**

Headteachers, as community leaders, recognise that their commitment to a positive vision is essential in change management. This commitment will include ensuring that the school community is fully informed of change proposals and the potential benefits. The LA will ensure that headteachers are therefore provided with the necessary support and systems to enable them to fulfill their leadership role throughout the Primary Review process.

### **How can we ensure that, no matter what happens to individual schools, school leaders are appreciated for their part in creating a new educational legacy?**

Owning the challenges of a changing population, falling rolls, financial constraints and inappropriate buildings or sites is a professional challenge, particularly when the school has been led to achieve excellence by its Headteacher. This is recognised as a sign of strong leadership skills.

### **Will the Review support Headteachers and schools to work together collaboratively?**

The solutions to the challenges can only be found if schools work collaboratively.

### **How will retention of quality school leadership be managed?**

The LA recognises the risk that this change management process can have to the ability of schools to retain and recruit school leaders. The LA, working with schools and unions, is developing plans to ensure that its high quality leadership is retained and there is opportunity for aspiring leaders.

### **How will we ensure access to early education is appropriately spread across the Borough?**

The Childcare Sufficiency Assessment is reviewed annually to ensure that provision meets the identified needs of communities.

### **How will we ensure access and equality are balanced across our Borough?**

The LA's priority should be to ensure that all children have access to high quality provision

within its area. The Primary Review enables opportunities for school organisation that provides a balance of school places across the Borough. This, and other strategic initiatives such as the SEND Strategy, will address issues of inequality of access in schools and specialist provisions.

#### **Can schools afford the redundancies that may be required?**

If required, redeployment to retain existing expertise is preferable to redundancy. The LA is currently considering how to ensure it is able to continue subsidising redundancy costs for schools. Where schools may be in financial difficulty they should contact the LA in the first instance.

## **Staff**

#### **How will we ensure skilled staff are retained?**

The LA and schools should develop a retention strategy as part of the Primary Review. This should include asking all schools in Tower Hamlets to consider all staff, who meet their selection criteria, but are affected by this Review, before they go out to public advert. It should also include support for staff in identifying opportunities and accessing training for career change and professional development.

#### **What strategies are in place to manage any redeployment or redundancy processes that might be needed?**

The LA maintains its strategy to minimize redundancies and has good working relationships with Trade Unions. The LA is currently undertaking a consultation on changes to benefits, terms and conditions for all staff, including school staff, which includes changes to severance pay and early retirement. Further information, including dates of information sessions for staff and how to provide feedback, has been provided to school leaders.

#### **How will this level of change be managed without staff anxiety?**

The level of change is bound to bring anxiety, but the level of falling rolls is already causing anxiety. Through creating a positive model which addresses and responds to the change needed, anxiety can be minimised, and opportunities for development recognised. School and LA leaders have a key role in helping staff and the local community to recognize the potential benefits for children of planned changes, and the risks if no action is taken.

#### **How will unions be involved?**

The Children's Services Trade Unions Forum has the Review as a standing agenda item, with an update provided at each meeting. A full briefing about the review was provided in the Summer 2018 and a report from the independent consultant in September 2018. The LA will continue its work with Unions as part of its commitment to the retention of staff and the promotion of staff wellbeing.

### **How can we be certain pupil projections are accurate?**

The LA recognises that, in this climate of rapid demographic change across Tower Hamlets and London, it is important that the information used to track and respond to these changes is robust and reliable. It has therefore made organisational changes and invested in additional capacity to ensure that pupil place planning sits at the heart of the work of the Education and Partnerships Division, and works more closely with planning and other council departments. This work is further enhanced through collaboration with the Greater London Authority (GLA), neighbouring local authorities, and data science experts. This has given greater assurance in the method of projecting the pupil population, based on the established trends in births, pupil rolls and the impact of housing development.

The Primary Review is an example of Tower Hamlets being proactive in identifying and responding to population changes in a way that supports school communities. The LA and schools need to be able to respond to variations in pupil numbers over time, so regular review and agile planning are at the heart of the new approach to pupil place planning which has been developed to mitigate as far as possible the risks arising from the use of projected figures.

### **Is there a coherent, ambitious, LA strategy to help sustain future direction during a period of change?**

This work forms part of the LA's strategy for school improvement and effectiveness, with the key objective of securing sustainable, world-class educational opportunities for children and young people attending school in Tower Hamlets. The School Organisation Strategy, linking with SEND Strategy and Childcare Sufficiency, will be developed to provide strategic direction and inform decisions. A School Organisation Committee, with representation from school leaders and other key stakeholders, will be established to support this work.

### **Will there be sufficient LA capacity to support significant educational change?**

The LA has identified the need to ensure that there is sufficient additional capacity to support schools throughout the change process, in areas such as finance, HR, legal, communications, and admissions. It recognises that change of this scale will, at times, require additional resource and expertise which will be provided. There are currently two external consultants supporting school organisational planning.

### **What short-term funding will be available to support schools with falling rolls to manage un-changing costs, such as PFI?**

This challenge is being discussed and addressed through the Schools Forum. A small amount of funding may be available. Schools are able to apply for licensed deficits, but these can only be granted where plans are in place to ensure future sustainability and the school is able to repay over time. Any school that is struggling to set a legal budget should seek

advice from the LA immediately and must demonstrate that its governors have been through a zero-based budgeting exercise and taken the necessary steps to match staffing levels to the number of children currently attending the school.

As part of the Primary Review schools are being supported through this process. Not all governing bodies have understood the financial challenges, because they have been able to use reserves to balance budgets that run with in-year deficits rather than tackle very difficult decisions around financial sustainability. Where schools have PFI costs to meet this is being considered as part of the feasibility planning for recommendations being developed for each educational community.

#### **How do we ensure that all schools are treated equally?**

The Primary Review Advisory Group (PRAG) agrees criteria which have been considered for each school. Peacock School and the “Birds” educational community have been designed so that schools can see the process used to develop work for every school considered “in scope”. The agreed criteria are being used to plan solutions which are different for each school, because each school is unique. At each stage of the planning process school leaders’ views are sought and recorded, until a proposal is developed and agreed with the LA. This process must be completed by July.

#### **Is there sufficient capital funding to make building changes required?**

Tower Hamlets has facility to use a number of funding sources to develop its school organisation plan. This includes grants from the DfE and contributions from property developers, as well as the option to access Council reserves and capital borrowing on favourable terms. Tower Hamlets will use this funding judiciously and it will also benefit from increasing land prices in the Borough. As part of the Review, the potential to raise income from unsuitable sites in order to create schools where there is need is being considered.

#### **How will we make the best use of any finances from the sale of sites?**

Tower Hamlets works with Consultative groups to help make funding choices transparent. As part of this report a recommendation is made to ensure that the spend of any monies received from the sale of educational sites are reinvested into education or community benefit, and that this process should be transparent.

#### **How will we ensure there remain sufficient education sites should there be changes to the child population in the future?**

The LA, in its Local Plan, has identified a number of sites that can be developed in the future if there are significant increases in the child population. The LA also has identified schools that could be enlarged, if necessary. Its capital asset management plan will ensure that certain school sites are retained for alternative community use, in case they are needed in future.

### **How can we be certain that new housing child yield is correctly calculated?**

Like pupil projections, 'child yields' are an attempt to predict the future based on what has happened in the past. Across London, it is becoming more difficult to know building project completion times, and occupancy patterns, that is why flexibility has been built into the pupil place planning strategy. The LA will also, from time to time, commission research, such as, a New Residents Survey, to update the information used to calculate child yields.

## **Governance**

### **How will the LA support governing bodies to understand the situation, the options available, and their potential consequences?**

Briefings at meetings for governors, and through The Director's Report and other correspondence are advising governors of the process being followed. The independent consultant has arranged meetings with each in scope school to explain the options and reasons for them. The Primary Review website provides further information. Recommendations have been made for governor training to support change.

### **Where extremely difficult choices have to be made how will we ensure decision making remains child focused and neither political nor partisan?**

To help maintain a focus on children, transparency and a clear communication strategy have been part of Local Authority planning from the start of the Review. The Primary Review Advisory Group (PRAG) and the employment of an Independent Consultant are part of the LA strategy to maintain this focus.

### **Given the sensitivity of significant change how will the balance between transparency and the need for confidentiality be maintained?**

The proposals being developed for schools are based on iterative discussions with the independent consultant, who has made early recommendations to individual schools, the Diocese and the Local Authority about potential ways to reduce school places and recreate financial and educational resilience. Where recommendations are not accepted by governors, this is clearly recorded and alternative proposals that would lead to the same reductions in pupil places are welcomed.

### **Are all schools being treated equally?**

Proposals are being developed with school leaders and differ depending on each situation. All governing bodies are given the same process options, but they are reaching different conclusions about how to address their own school challenges.

### **Would being an Academy/Free School help resolve the challenge for individual or groups of schools?**

The independent consultant is working with all schools, regardless of status, because the challenge is about creating resilient, fit for purpose provision. Changing school status will not increase the number of children in an area, nor will it ensure long term financial sustainability in an undersubscribed school.

### **Who decides whether a school should close, amalgamate or relocate?**

The DFE provides statutory guidance on the processes that must be followed (see Bibliography). In Tower Hamlets the decision making body for school changes following statutory consultation is the Mayor in Cabinet.

## **Community**

### **How will community reaction to significant changes to their schools be managed?**

A Communications Strategy is in place for the review which is supported by a panel of senior officers in relevant teams and external experts. This will help local communities understand the reasons for proposed changes. Full consultation on proposed changes will take place from November 2019.

### **If schools with long histories might close how will the attachment of generations to the school be supported?**

If schools do have to close the proposals will include suggestions for how their history and values will be recognised and appropriately commemorated.

### **How will Community and Business support for local schools be maintained during the change process?**

As part of the proposal planning any key risks to support will be identified and mitigation put in place.

## Glossary

### **Primary Review Advisory Group (PRAG)**

A group of key stakeholders advising the LA and diocesan boards before decisions are taken on school reorganisation.

### **Terms used to describe collaborative working:**

*Partnership* – refers to informal arrangements between schools.

*Hard Federation* – a joint governing body has been established.

*Federation* – individual governing bodies are in place but formal agreements have been set up to share resources (eg. Joint Headteacher, Caretaker, shared site).

*Educational community* – a group of families and their children either in a particular area, or seeking a particular faith provision, or with a particular need.

*Amalgamation* – two or more schools joining together through a formal statutory process.

*Schools Company* – a vehicle for pooling money from several schools to manage shared recruitment.

*Collective purchasing and provision* – arrangements where schools make joint purchases to save money, with one of the schools holding the budget for the others.

*Multi Academy Trust (MAT)* - the preferred Department for Education (DFE) model for schools wishing to work together outside the Local Authority structure.

### **Key Stages**

Education in the UK is split into separate age phases

Early Years Foundation Stage (EYFS) and Key Stages (KS) 1-5

### **Outcomes**

This term refers to children's achievements as they progress through their schooling. It applies to a wide range of achievements but is mainly used to refer to outcomes in end of Key Stage Assessments. Where percentages are used in this report they refer to:

- At EYFS the percentage of children reaching a good level of development
- At KS1 the percentage of children reaching expected standard in reading, writing and mathematics
- At KS2 the percentage of children reaching expected standard in reading, writing and mathematics.

Where there is variation between subjects or in patterns for the numbers of children achieving higher than expected outcomes this may also be highlighted.

### **Tower Hamlets Educational Partnership (THEP)**

An independent schools' company funded by Tower Hamlets Schools and consultancy work.

Commissioned by the Local Authority to manage its school improvement function.

### **Recommendations – use of auxiliary verbs**

Could – scope for other choices as far as the consultant is concerned

Should – Consultant believes this would be best practice

Must – Consultant believes review outcomes cannot be delivered if this isn't done

Statutory - all of us have to follow this (including the consultant)

### **Published Admission Numbers (PAN)**

The number of children a school can admit each year. Often expressed as forms of entry (FE).

1 FE = 30 children, 2 FE = 60 children etc.

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Tower Hamlets SEND Strategy 2018-2023  
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# **Primary Schools Review:**

## **Overview of the position and future challenges**

**April 2018**

Prepared by: Pupil Services &  
School Sufficiency



## Executive Summary

Tower Hamlets has experienced the fastest population growth in the UK, and the borough's primary school provision has been expanded to meet this demand. However, the borough's population growth has not translated into the need for school places that was anticipated. The number of reception pupils in 2017/18 is about the same as it was four years earlier in 2013/14. This has led to an increasing surplus of places and has put considerable pressure on school and local authority budgets.

There are many complex factors which have contributed to the slow growth of demand for primary places in the borough. Birth rates have fallen substantially, young families are increasingly moving out of Tower Hamlets, and there has been an increase in the take up of independent provision. These trends have been driven by the borough's quickly changing demographics, housing stock, and other economic factors.

There has also been a stark contrast between the West and the East of the borough. While areas in the West have seen falls in the demand for primary school places, areas in the East have seen increases. Projections indicate that this situation will worsen over the coming decade. By 2027/28, the West of the borough is projected to have a surplus of around 390 reception places while the East of the borough is projected to have a shortfall of around 270 places.

In light of these issues, the local authority must reorganise primary school provision in the borough through a well-managed rationalisation process to ensure that all children have access to high quality and financially sustainable education in their local area.

## 1. Introduction

Tower Hamlets has experienced the fastest population growth in the UK in recent years. Between 2006 and 2016, the borough gained around 82,500 residents and grew by 38%. This was more than double the rate of population growth seen in London as a whole (15%) and five times the growth in England (8%).<sup>1</sup>

The borough's primary school provision was expanded to meet this demand, but population growth has not translated into the need for school places that was anticipated in Tower Hamlets (or indeed for London more widely<sup>2</sup>). This has led to a significant surplus of primary school places in the borough, over and above what is required to allow for parental choice. In January 2018, there were around 1,860 unfilled primary school places across all year groups – equivalent to 62 forms of education (FE) or 7% of the borough's supply. In reception alone, there were around 390 unfilled reception places (10% or 13FE). Projections indicate that surpluses in some areas of the borough will continue to increase.

It would be unsustainable, both for the local authority and for schools, to maintain this level of surplus primary provision. The council is therefore undertaking a review of primary school provision to maximise the efficiency of current and future school sites so that children continue to have access to high-quality, sustainable school places in their local area.

This report brings together evidence on the demand for school places, which will underpin the council's proposals for the reorganisation of primary school places. It aims to explain how demand for primary places has grown and what is projected to happen in the future.

### 1.1 Technical Notes

Different sources of information use different geographical boundaries. Admissions and pupil data is generally based on catchment areas which have been designed around geographical boundaries and obstacles to allow for safe walking journeys. Other demographic data often uses wards, and the borough's ward boundaries changed in 2014. This means that the maps in this report use different geographical boundaries.

It should also be noted that for the purposes of the review, 'primary provision' refers to mainstream primary schools. Special schools are not included as they are planned for separately.

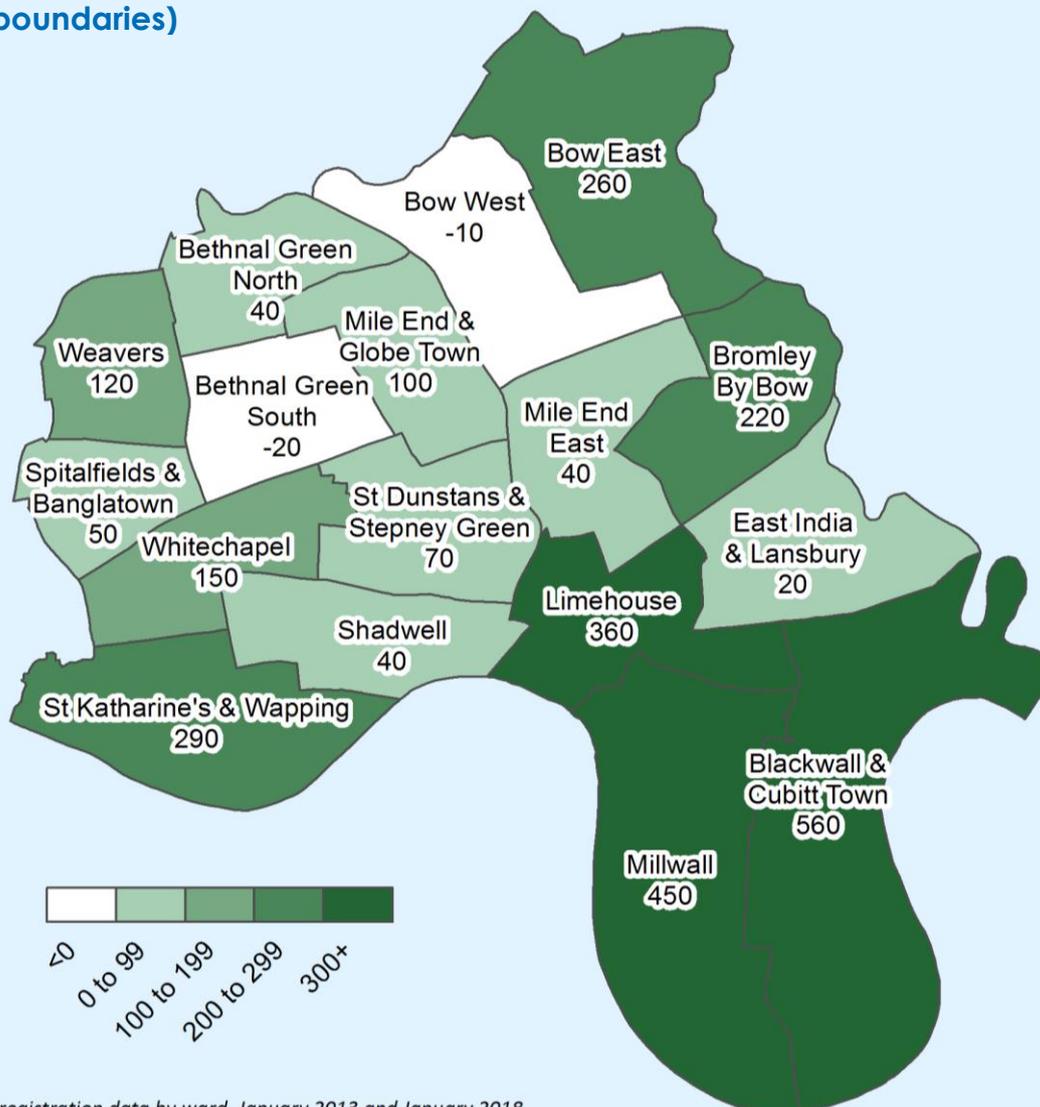
Finally, while this is a review of all primary places, much of the analysis presented in this report is focussed on reception pupils. Trends are easier to detect when looking at a single year group and reception numbers offer the best indication of demand. Historically, cohorts of pupils tend to get slightly smaller as they age through primary school.

## 2. Historic growth in demand

The number of primary-aged children (aged 4 to 10) in Tower Hamlets increased from 24,200 in January 2013 to 26,500 in January 2018.<sup>3</sup> This is an increase of 2,700 primary-aged children, or 11%, over the past five years.

However, **Figure 1** shows that population growth has varied greatly between different areas of the borough. Areas in the Isle of Dogs (Millwall and Blackwall & Cubitt Town wards) have, by far, seen the biggest increase in the number of primary-aged children. Population growth in the Central and West areas has been considerably lower. Bethnal Green South and Bow West wards saw minor reductions in the number of primary-aged children living in those areas.

**Figure 1: Increase in number of children aged 4 to 10, 2013 to 2018, by ward (2003 boundaries)**



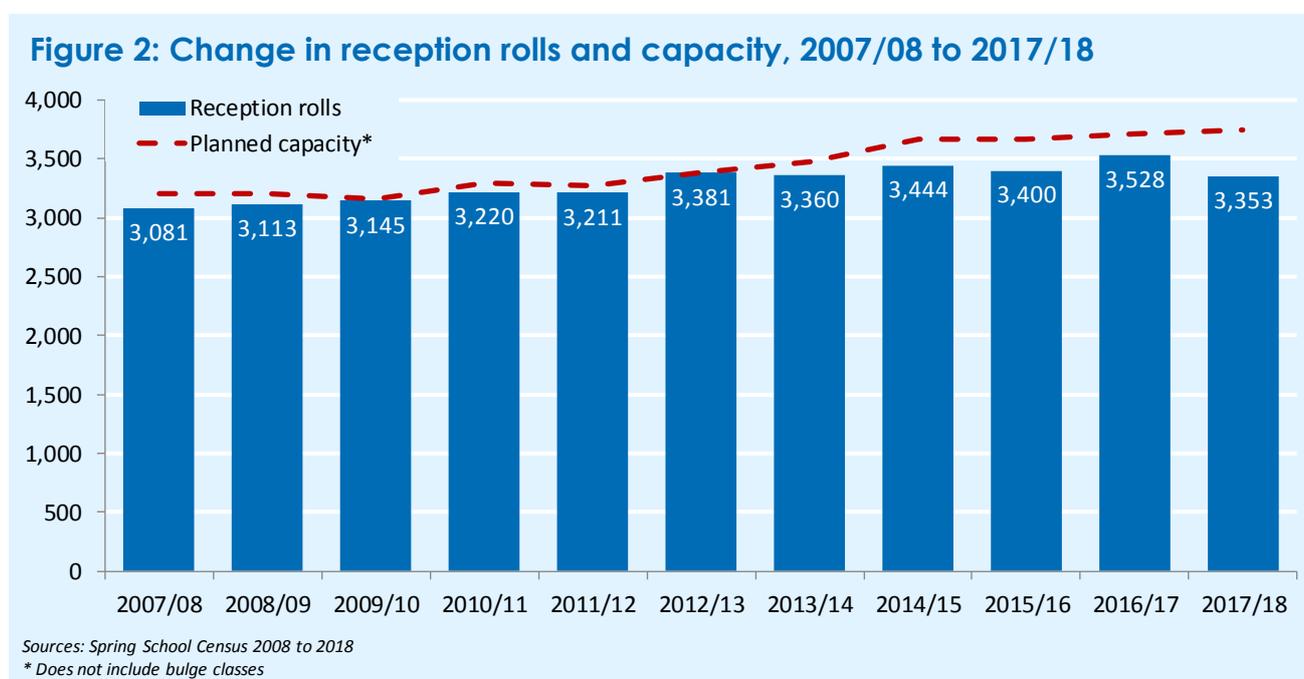
Source: GP registration data by ward, January 2013 and January 2018

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## 2.1 Reception rolls

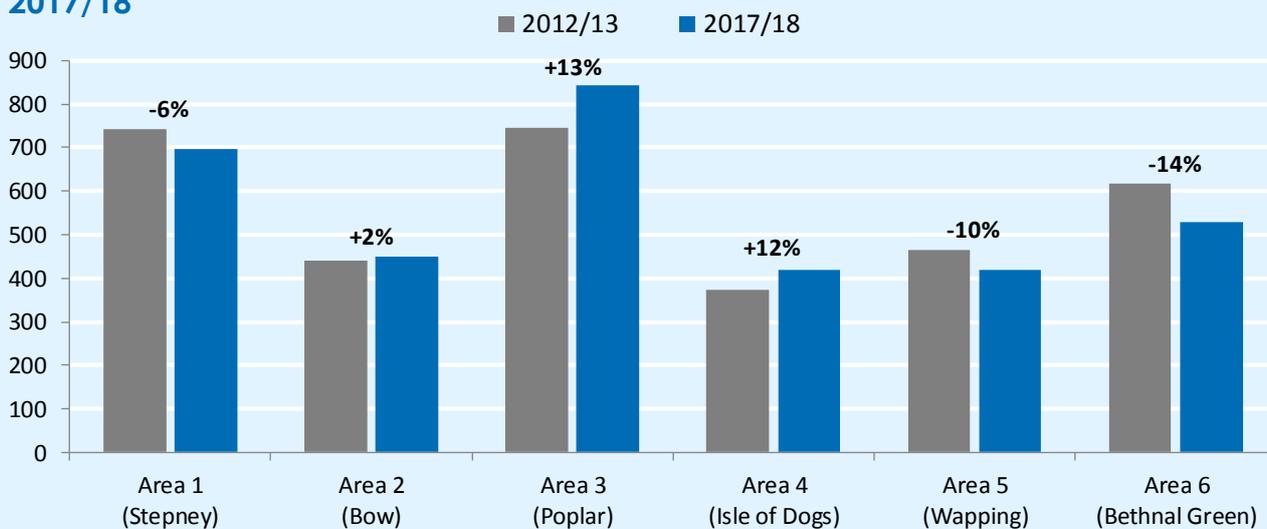
Over the past ten years, the number of reception pupils has grown by 9%, up from 3,081 in 2007/08 to 3,353 in 2017/18 (see **Figure 2**). However, there has been a great deal of fluctuation in the reception rolls in the past five years. The number of reception pupils peaked in 2016/17 at 3,528 pupils, but fell substantially in 2017/18 to 3,353 – around the same number of reception pupils in the borough four years earlier in 2013/14.

Since the borough's provision of reception places has increased at the same time, the difference between supply and demand has been growing. In previous years, the borough had surplus capacity ranging from between 0% to 4%, with an occasional need to accommodate bulge classes. However, in January 2018 this surplus stood at around 390 reception places, which is equivalent to 13 FE or 10% of the borough's current reception capacity.



There have been substantial differences in the growth of reception rolls between catchment areas. **Figure 3** shows that both Poplar and Isle of Dogs catchments have seen large increases in their reception rolls, growing by 13% and 12% respectively. By comparison, Bethnal Green (-14%), Wapping (-10%) and Stepney (-6%) catchments have seen significant reductions in the number of reception pupils over the past five years.

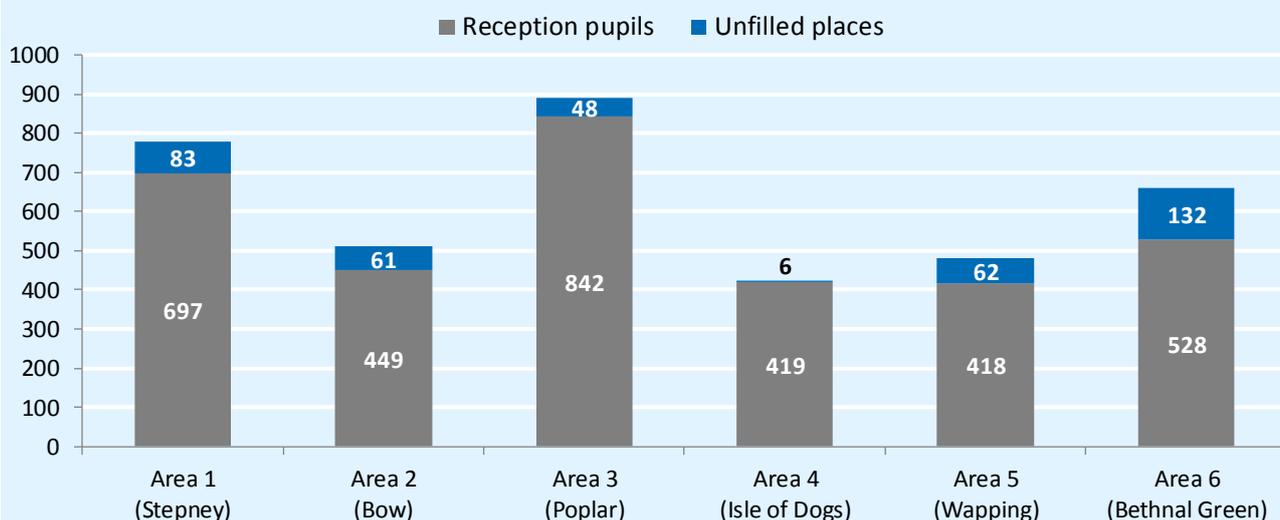
**Figure 3: Change in number of reception pupils by catchment area, 2012/13 to 2017/18**



Source: Spring School Census 2013 and 2018

Figure 4 shows that there is also a disparity between catchment areas in the number of unfilled reception places. Bethnal Green catchment had 132 unfilled places in January 2018, meaning that one in five reception places (20%) in the area were not filled. In contrast, the Isle of Dogs catchment had only 6 unfilled reception places, accounting for around 1% of the area's places.

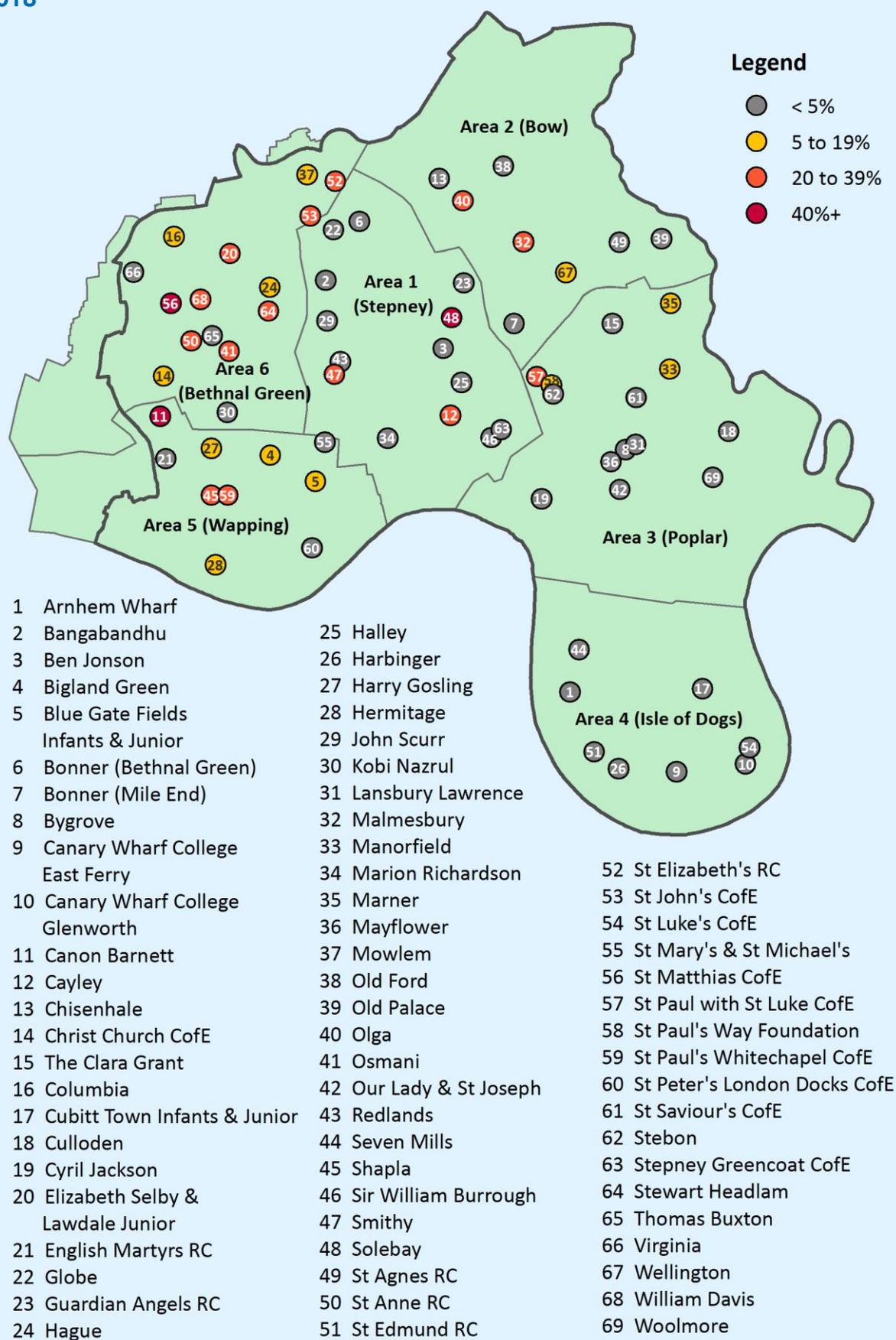
**Figure 4: Unfilled reception places by catchment area, January 2018**



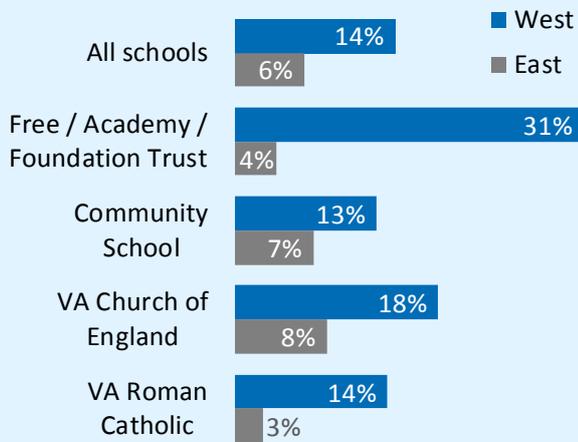
Source: Spring School Census 2018

Even within these catchment areas, there are differences between schools. While some schools are at capacity, others have in excess of 25% unfilled reception places. Figure 5 provides a map of unfilled reception places by school. It shows that while unfilled places are concentrated in the West of the borough, schools with a number of unfilled places can often be located near schools that are at or near their capacity.

**Figure 5: Primary schools by percentage of unfilled reception places, January 2018**



**Figure 6: Percentage of unfilled reception places by sector and area, January 2018**



Source: Spring School Census 2018  
 West = Bethnal Green, Stepney and Wapping catchments  
 East = Bow, Poplar and Isle of Dogs catchments

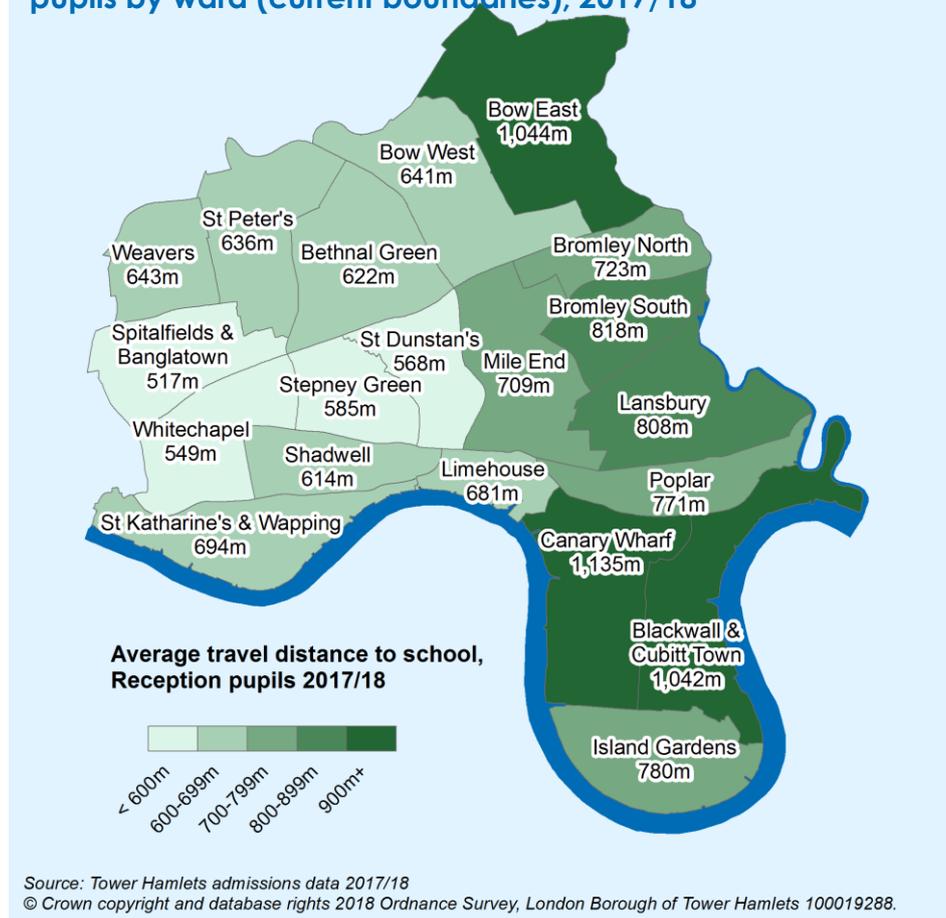
Figure 6 shows that while all sectors have a higher proportion of unfilled reception places in the West compared with the East of the borough, there are still disparities by sector. In the West, the proportion of unfilled reception places in free, academy and foundation trust schools (31%) was double the proportion of unfilled reception places in all schools (14%). Community schools had the lowest proportion of unfilled places (13%) in the West of the borough.

Differences between sectors are much less pronounced in the East, where all sectors have a relatively low proportion of unfilled places.

## 2.2 Average travel distances

The average travel distance for a reception pupil in 2017/18 was 729 metres which is well below the statutory travel distance. However, average travel distances vary considerably between areas. Figure 7 shows that travel distances are higher for pupils in the East of the borough than they are in the West. Canary Wharf has the longest average travel distance for pupils, at 1,135m. This is more than double that in Spitalfields & Banglatown (517m), the ward with the shortest average travel distance.

**Figure 7: Average travel distance to school for reception pupils by ward (current boundaries), 2017/18**

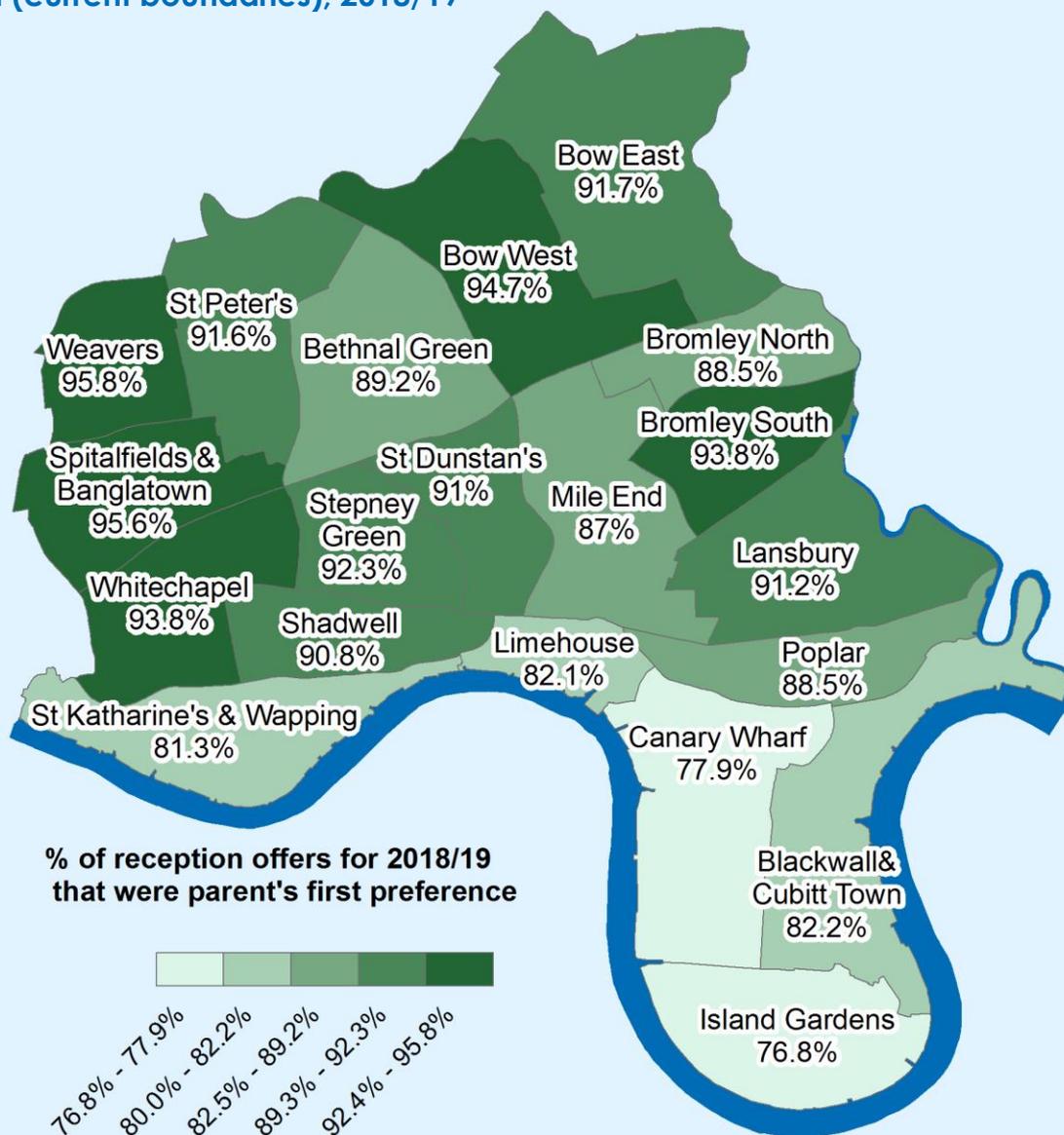


Source: Tower Hamlets admissions data 2017/18  
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## 2.3 Parental preference

Across the borough, 89.2% of offers made for reception places in 2018/19 were the parent's first preference of school. However, there are differences by area that show a slightly different pattern of demand than the other population and pupil data above. **Figure 8** shows that pupils in the South of the borough, particularly in the Isle of Dogs but also including Limehouse and St Katharine's & Wapping, have the lowest proportion of reception offers that were first preferences for 2018/19. By comparison, wards in the North of the borough (including those in the East) have higher levels of parental preference.

**Figure 8: Percentage of reception offers that were parents' first preference by ward (current boundaries), 2018/19**



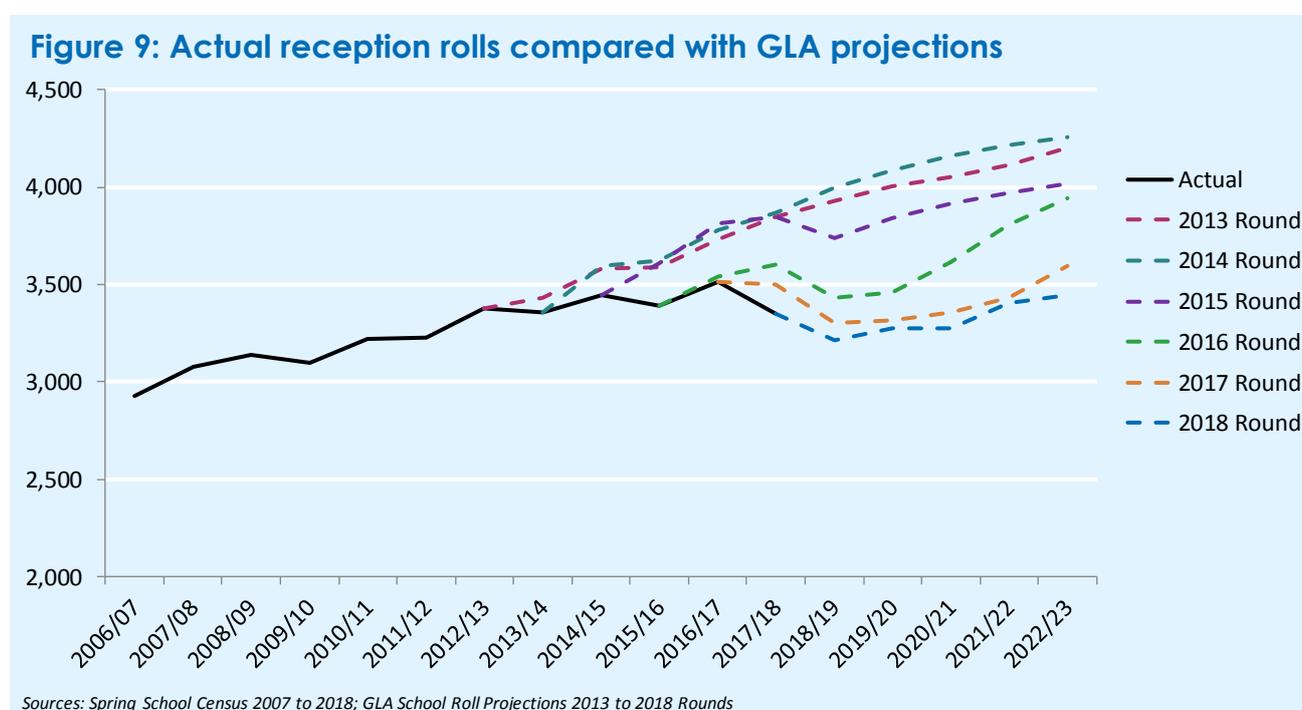
Source: Tower Hamlets admissions data 2018/19

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## 2.4 Actuals versus projections

It is impossible to predict the future, but statistical models use the best information available on historical trends and assumptions to project the population and future demand for school places. These projections are then used to proactively plan school provision in the borough. (For a summary of the projection methodology, see the [Appendix](#).)

Although projections have been very accurate historically, more recent rounds of projections anticipated that primary school rolls would grow much more rapidly than they have. **Figure 9** shows that earlier rounds of projections (2013, 2014, 2015) anticipated that the borough would have around 500 more reception pupils on roll in 2017/18, while the latest rounds of projections are now reflecting the slower rates of growth that have actually been experienced in the borough.



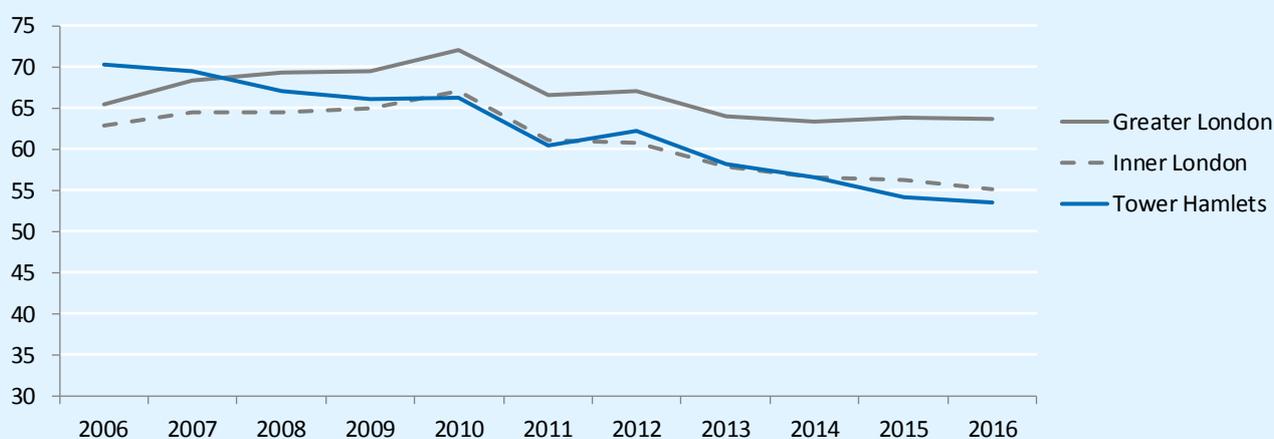
Many social and economic factors influence population change and the demand for school places, so the reasons for the borough's slow growth of primary pupils are complex. Projections largely rely on information about what has happened in the past to make assumptions about the future. This makes projections more difficult in times of demographic change, and Tower Hamlets has undergone significant change in recent years.

## 2.5 Births and fertility

Despite population growth, Tower Hamlets has experienced a fall in the number of births since 2013. In 2016, there were an estimated 4,592 live births in the borough – just 27 more births than there were in 2010 (4,565).<sup>4</sup> This has meant that the borough's general fertility rate (measured as the number of births per 1,000 women aged 15-44) has fallen quite substantially.

**Figure 10** shows that in Tower Hamlets, the general fertility rate was above both the Greater London and Inner London averages in 2006. By 2016, the rate in Tower Hamlets had fallen substantially below the average for Greater London and slightly below the average for Inner London.

**Figure 10: General fertility rates (births per 1,000 women aged 15-44), 2006-16**

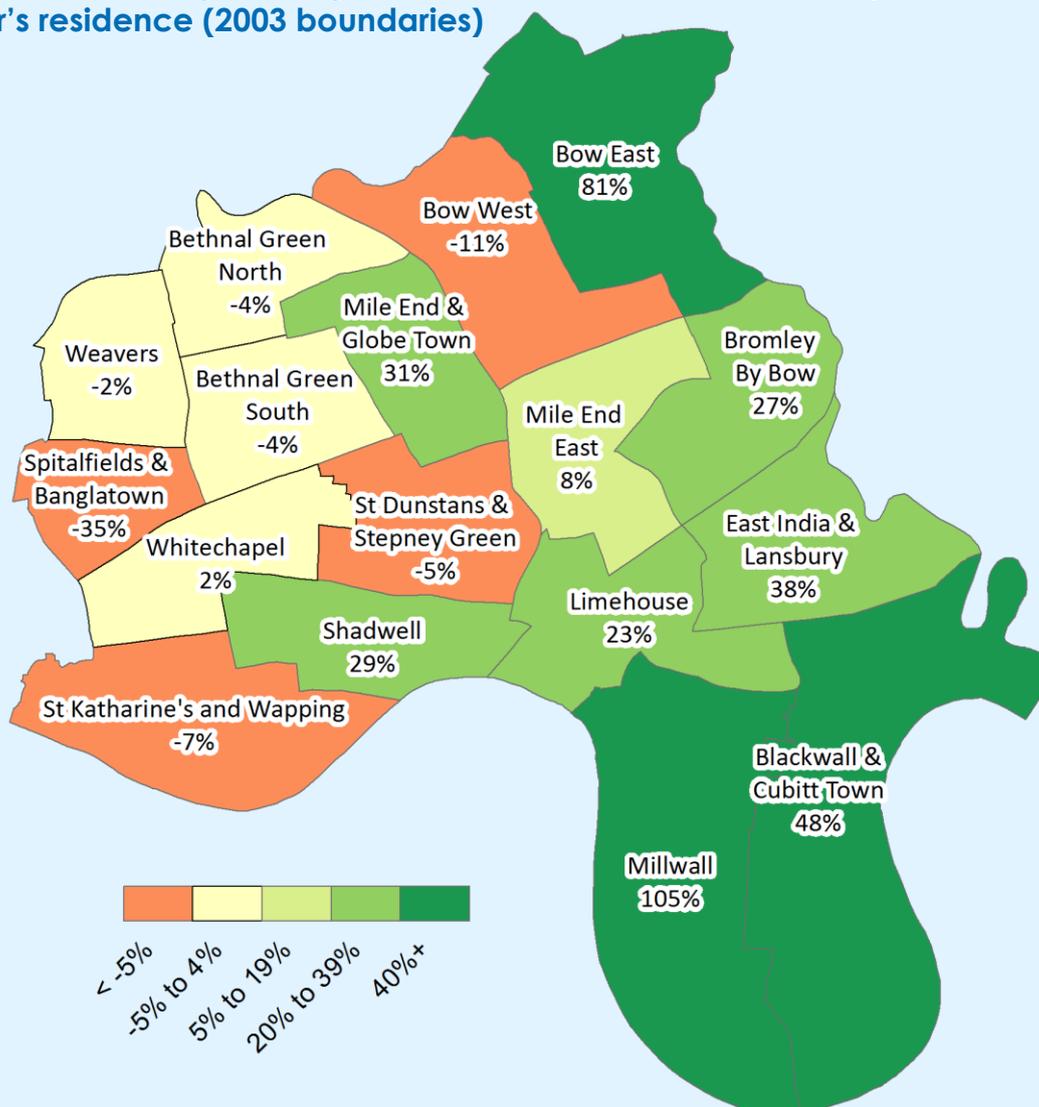


Source: Office for National Statistics, Births in England and Wales summary tables via London Datastore

The change in the number of births over time varies between different areas of the borough. **Figure 11** shows that areas in the East of the borough have seen the biggest increases in the number of births from 2003 to 2013<sup>5</sup>. In particular, Millwall ward in the Isle of Dogs saw the number of births more than double, from 207 births in 2003 to 425 births in 2013 (+105%). Bow East (+81%) and Blackwall and Cubitt Town (+48%) also saw significant increases in the number of births.

On the other hand, many wards in the West of the borough saw either falls in the number of births over the decade, or marginal change. Spitalfields & Banglatown saw the biggest fall in the number of births during this period – falling from 195 births in 2003 to 126 in 2013 (-35%).

**Figure 11: Percentage change in number of births 2003-2013, by ward of mother's residence (2003 boundaries)**



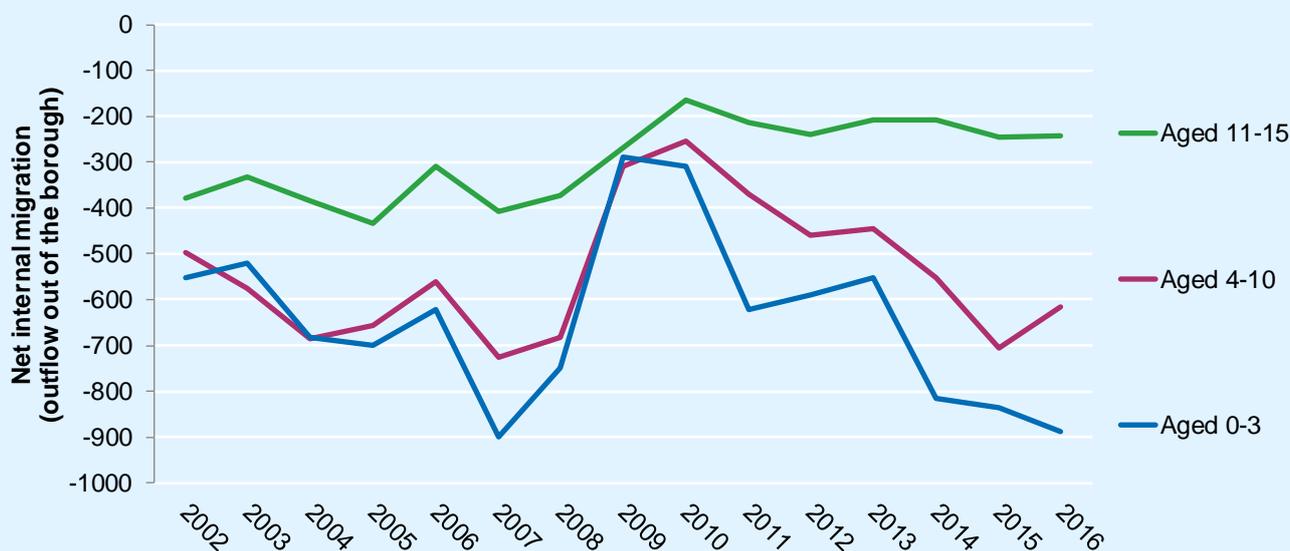
Source: Office for National Statistics, Live Births by Ward 2002-2014 (ad hoc request) via London Datastore  
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## 2.6 Internal Migration

Internal migration is the movement of people between Tower Hamlets and the rest of the UK (for example, a family moving from Newham to Tower Hamlets, or from Tower Hamlets to Newham). There is a long-established pattern of a greater number of children leaving Tower Hamlets for other areas in the UK than children from elsewhere in the UK moving into the borough, leading to negative net internal migration. However, when the financial crisis hit in 2008, many families who may otherwise have left the borough decided to stay. This is most likely because there were better job prospects in the capital, or because of a downturn in the housing market.

Since 2010, outward migration of young families in Tower Hamlets (and indeed the rest of London<sup>6</sup>) has escalated and has now returned to pre-crisis levels. **Figure 12** shows that this trend is particularly pronounced for early years and primary aged children, contributing to the fall in primary school rolls.

**Figure 12: Net internal migration of children in Tower Hamlets, 2002 to 2016**



Source: Office for National Statistics, Internal Migration Flows via London Datastore

## 2.7 Take up of school places

Over the past five years, the number of four year olds living in the borough has increased by around 6%, based on GP registrations. At the same time, the number of reception pupils in state-funded provision is around the same as it was five years ago. This indicates that the take up of state-funded primary places in the borough has fallen. In 2012/13, around 91% of four year olds took up reception places but in 2017/18, this had fallen to 85%.<sup>7</sup>

The fall in reception take up is not due to a greater proportion of pupils attending schools out of borough. In 2009/10, 99% of reception pupils attending state-funded schools and resident in Tower Hamlets attended a school in the borough (the remaining 1% attended schools in the City of London or Hackney). In 2016/17, this percentage stood at 98%, so it has remained fairly consistent in recent years.

It is therefore likely that an increasing number of children in Tower Hamlets are attending independent provision, though data on pupils in independent schools is limited. There are currently eight independent schools in the borough with primary provision, two of which have opened recently. Buttercup Primary School opened in the Wapping catchment area in 2012 and Date Palm Primary School opened in the Bethnal Green catchment area in 2013.

## 2.8 Drivers of change

There are many interrelated factors which have contributed to the borough's falling birth rates, increasing outward migration, and falling uptake of state-funded school places. These include (but are not limited to):

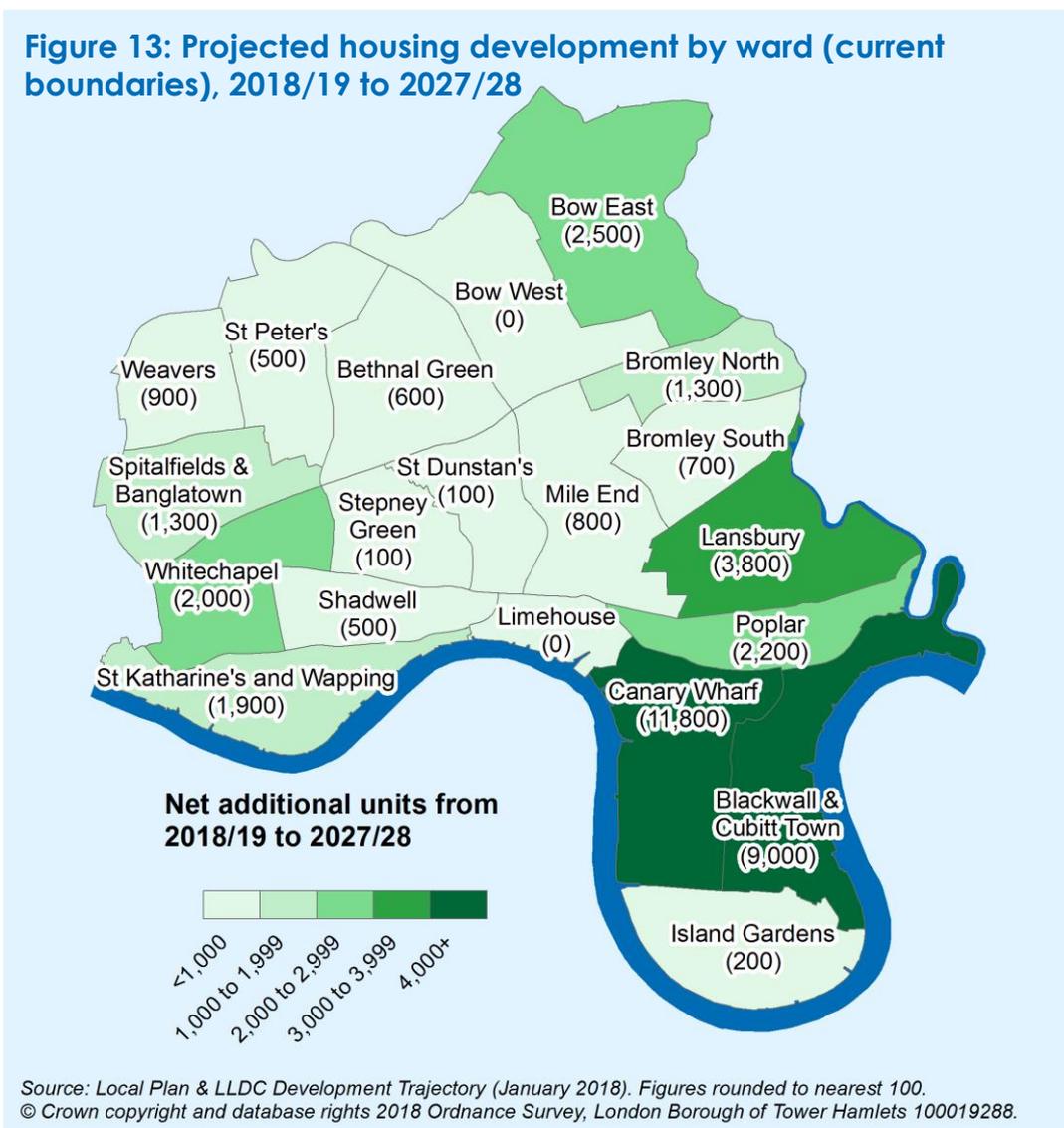
- The type and size of new properties built in Tower Hamlets
- Rising rents and house prices
- Welfare reforms, such as the Benefit Cap, which have reduced incomes for families
- A change in the demographics of Tower Hamlets residents
- Properties which are vacant or otherwise not used as family homes (e.g. Airbnb)

### 3. Future demand

As the previous chapter illustrated, it can be very difficult to anticipate how the borough's population will change as this is affected by many different factors. Nonetheless, local authorities must use the best information available to proactively plan for the needs of their residents – not only in terms of school places, but also other types of services and infrastructure like GP surgeries and transport.

#### 3.1 Housing development

In Tower Hamlets and in London more generally, housing development is the most important factor for projecting population growth. In the past 15 years, more homes have been built in Tower Hamlets than in any other London borough.<sup>8</sup> Over the next decade, around 40,200 additional new homes are expected<sup>9</sup> – which equates to about 11 new homes every day over the next ten years.



**Figure 13** shows that around half of these new homes (52%) will be located in Canary Wharf and Blackwall & Cubitt Town wards in the Isle of Dogs. Housing development is also concentrated along the East of the borough and in the City Fringe area in the West of the borough. Relatively little housing development is expected to be delivered in the centre of the borough.

### 3.2 Population growth

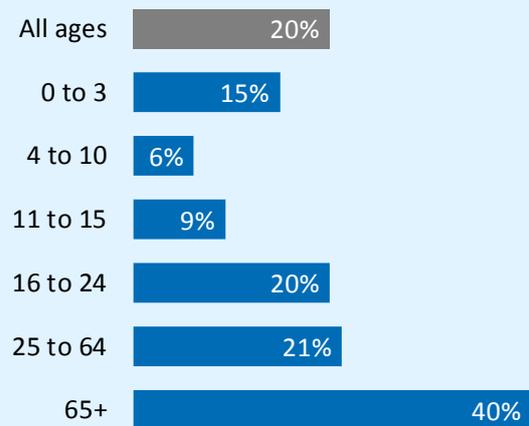
The Greater London Authority (GLA) produces population projections for London boroughs which take into account the amount of housing development expected to be delivered, as well as recent trends in births, deaths and migration.

These projections show that the borough population is expected to grow from an estimated 313,900 residents in 2018 to 375,600 residents in 2028.<sup>10</sup> This would be a 20% increase in the population over the next decade.

However, **Figure 14** shows that different age groups in the population are expected to grow at different rates. The number of primary-aged children (aged 4 to 10) is only expected to grow by 6% over the next ten years, compared with 20% overall.

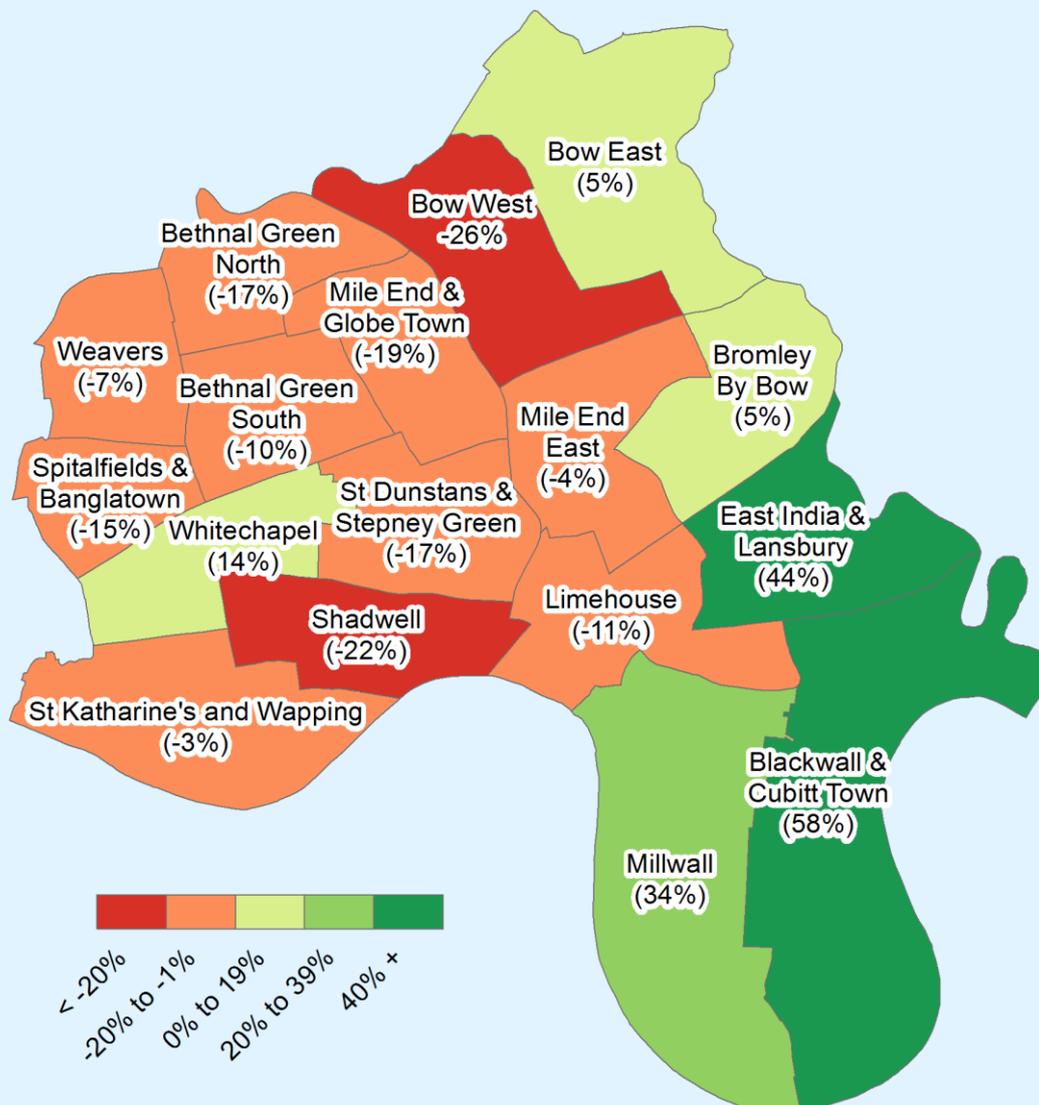
The majority of growth in the population of primary-aged children is expected to be in the East of the borough, as shown in **Figure 15**. Blackwall & Cubitt Town ward is expected to see the biggest increase in the number of 4 to 10 year-olds, growing by 58%. Areas in the West and centre of the borough are projected to see declines in the number of primary-aged children, with the exception of Whitechapel ward. The largest fall is expected to be in Bow West ward, declining by 26% over the next ten years.

**Figure 14: Projected percentage population growth 2018 to 2028, by age group**



*Source: GLA 2016-based BPO population projections (produced March 2018)*

**Figure 15: Projected percentage increase in number of 4 to 10 year olds by ward (2003 boundaries), 2018 to 2028**



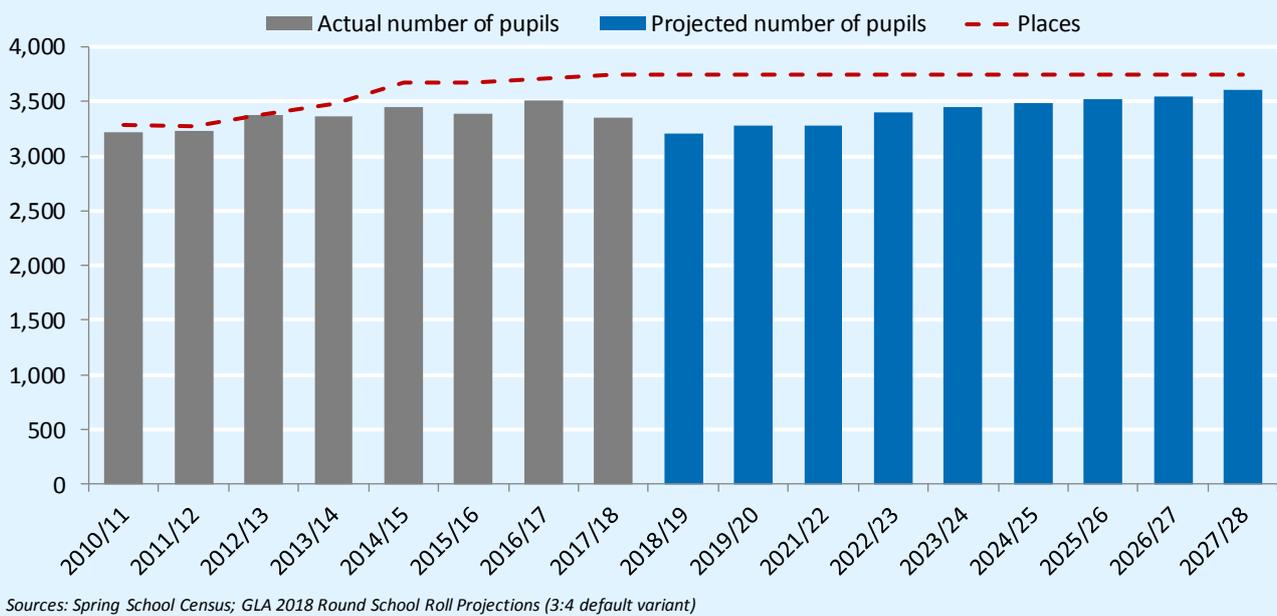
Source: GLA 2016-based BPO population projections using Local Plan & LLDC development trajectory, UPC variant.  
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### 3.3 School roll projections

The population projections presented above, along with School Census data, are used to project pupil numbers in the future. (For an explanation of the methodology, see the [Appendix](#).)

These projections indicate that the demand for reception places in the borough will fall further over the next few years before rising slowly (see [Figure 16](#)). This would increase the borough's total proportion of unfilled reception places to 12-14% up to 2021/22 before gradually falling back down to around 4% in 2027/28.

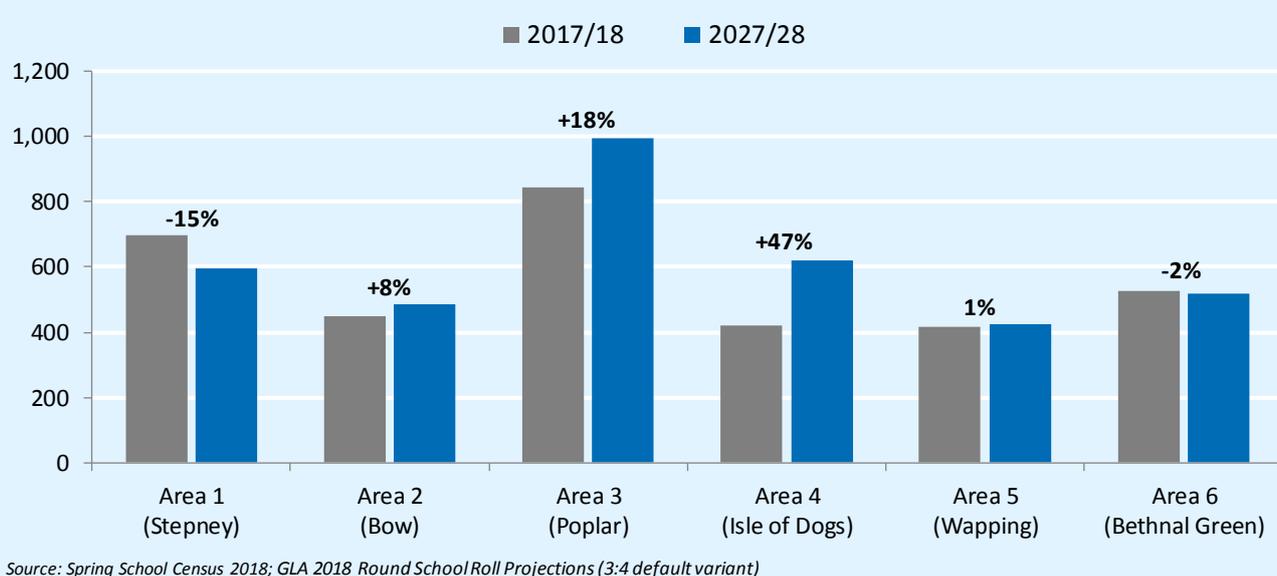
**Figure 16: Actual and projected number of reception pupils vs. places**



However, the growth in demand for places is projected to be unequally distributed across the borough. **Figure 17** shows that the Isle of Dog catchment is, by far, expected to see the biggest increase in the next ten years. The number of reception pupils in this area is projected to increase by around 200 pupils, or 47%. Poplar catchment is also expected to see a large increase in reception pupils, growing by around 150 pupils, or 18%.

At the same time, Stepney catchment is expected to have around 100 fewer reception pupils in 2027/28, a 15% fall. This would result increase the number of unfilled reception places from 83 in 2017/18 to 186 in 2027/28. Bethnal Green catchment is also expected to see 2% fall in the number of reception pupils, increasing the number of unfilled places from 132 in 2017/18 to 142 in 2027/28.

**Figure 17: Projected change in reception pupils by 2027/28 by catchment area**



### 3.4 Uncertainty about the future

All projections are subject to some level of uncertainty, but projections are at their weakest in times of demographic change because they rely heavily on information about historical trends. Chapter 2 demonstrated that previous rounds of school roll projections did not anticipate changes in births and migration, which led to lower numbers of primary pupils than had been projected.

Brexit makes this an even more uncertain time. It will undoubtedly impact many social and economic factors which affect the borough's population and demand for school places. However, there are still many unanswered questions such as:

- How will immigration from the EU fall, and how will immigration from other countries outside the EU change?
- To what extent will EU citizens already resident in the borough choose to leave?
- How many jobs will leave Canary Wharf and the City for other European cities, and what will be the impact on other supporting industries?
- Will property prices in the borough fall, and will that cause developers to build new homes at a slower rate than expected?

All of these factors suggest that population growth in Tower Hamlets could be lower than currently projected, but the borough may experience unexpected demographic changes. It is possible that the birth rates could rise or that outward migration could fall, which would lead to a higher demand for school places. It is therefore crucial that demographic trends are closely monitored in the future.

## 4. Conclusion

Tower Hamlets has experienced the fastest population growth in the UK and the borough's primary school provision was expanded to meet this demand. However, the borough's population growth has not translated into the need for school places that was anticipated. The number of reception pupils in 2017/18 is about the same as it was four years earlier in 2013/14. This has led to an increasing surplus of places and has put considerable pressure on school and local authority budgets.

These surpluses are unevenly distributed across the borough. Whilst areas in the West of the borough have seen a fall in demand, areas in the East of the borough have seen an increase.

Projections indicate that this situation will worsen over the coming decade. By 2027/28, catchments in the West (Stepney, Bethnal Green, Wapping) are projected to have a combined surplus of 390 reception places, or 13 FE. At the same time, catchments in the East (Bow, Poplar, Isle of Dogs) are projected to have a combined shortfall of around 270 reception places, or 9 FE.

This situation presents the Authority with a major challenge to limit the number of surplus primary school places. It will need to ensure that key stakeholders understand its strategy, and that an effective process is in place to manage any rationalisation of supply. This process will be guided by the following objectives:

- Maintain and improve the quality of provision in Tower Hamlets
- Reduce the number of schools with surplus places within catchment areas whilst ensuring that they continue to provide an equitable distribution of school place provision
- Ensure that all schools remain economically viable
- Maximise the value and efficiency of existing and new school sites, and where possible, encourage schools to work with community bodies and the Early Years sector to utilise surplus space
- Look at opportunities for schools to adapt space for specialist purposes such as ICT, libraries, parent/care facilities
- Minimise the cost of school buildings which are out of use
- Continue to maximise parental preference
- Minimise the impact on travel distances for pupils
- Avoid the use of half-forms of entry and vertical groupings
- Ensure that management structures and arrangements optimise links between agencies responsible for school place planning and admissions and those responsible for school improvement and fair access policies
- Establish a school organisation plan that represents a clear and meaningful exposition of the local strategy on the provision of school places.

Success in implementing this strategy will release significant resources that can benefit pupils across the Tower Hamlets area.

## Appendix: School roll projection methodology

Tower Hamlets Council commissions school roll projections through the Greater London Authority (GLA), like most other London boroughs. GLA have access to data on all pupils in London (via the National Pupil Database) which enables them to model movements across borough boundaries in a way that would be difficult for an individual authority.

Projections are usually run each year in March/April using the following methodology:

- Step 1.** The borough's population is projected based on demographic trends (e.g. births, deaths, and migration) and the borough's housing development trajectory using planning data submitted by the council.
- Step 2.** The flow of pupils from their ward of residence (including those out of borough) to each mainstream state school is determined, based on the Spring School Census and estimates of the number of children living in each ward. These are turned into ratios, for example, one in five Year 1 pupils living in XYZ Ward go to ABC Primary School. These existing ratios are not available for new children entering school in Reception, so these ratios are determined based on previous years.
- Step 3.** The number of pupils in each school is projected by multiplying the flow ratios by the populations in each ward. For example, if one in five Year 1 pupils in XYZ Ward go to ABC Primary School, and it is projected that there will be 100 Year 1 pupils in the ward, then 20 pupils from this ward are expected to go to ABC Primary. The number of pupils from each ward is then added up for each school.
- Step 4.** Projections are aggregated to catchment area and borough-level to improve reliability.

## Endnotes

<sup>1</sup> Office for National Statistics, 2006 and 2016 Mid-year population estimates accessed via [NOMIS](#) (revised estimates published on 22 March 2018).

<sup>2</sup> Greater London Authority, [2018 Pan-London School Place Demand Projections](#)

<sup>3</sup> GP Registration Data by ward, sourced from GLA.

<sup>4</sup> Office for National Statistics, [Births in England and Wales summary tables](#).

<sup>5</sup> The Office for National Statistics has released ward-level birth data for 2014 and 2015 as well, but these are in the borough's new 2014 ward boundaries. The 2003-2013 time period has been used so that the data has consistent geographical boundaries.

<sup>6</sup> Greater London Authority, December 2016. [Are Thirty-something Londoners Really Fleeing the Capital? \(blog\)](#)

<sup>7</sup> These take up rates have been calculated by dividing the number of reception pupils on the Spring School Census (including those in special schools) by the number of four year olds on the GP register in July the previous year.

<sup>8</sup> Department for Communities & Local Government, [Live tables on housing supply: net additional dwellings \(Table 122\)](#).

<sup>9</sup> This is based on the Tower Hamlets Local Plan and LLDC development trajectories for conventional units. These trajectories take into account planning permissions, site allocations and the Strategic Housing Land Availability Assessment (SHLAA).

<sup>10</sup> Greater London Authority, 2016-based Borough Preferred Option (BPO) population projections using the Local Plan & LLDC development trajectory (UPC variant, produced March 2018).

## Review of primary school places

- 3.1 Primary place planning in Tower Hamlets is split into six planning areas referred to as school catchment areas.
- 3.2 Tower Hamlets had previously experienced a long run of gradual increases in demand for primary school places. Other London boroughs did too. Since 2017, there has been a drop in primary applications followed by a further substantial drop in 2019. The decline in pupil numbers is similar to the experience of most other London boroughs.

	2016/17	2017/18	2018/19	2019/20
No of Applications Received for Reception	3405	3305	3329	3169

- 3.3 The current round of projections indicate that, numbers in most of the school catchment areas will remain steady up until 23/24, with the exception being that the areas of Poplar and the Isle of Dogs still expect to see significant increases through planned housing developments from 2020 onwards. However, the projections for these two areas need to be viewed with caution as it is evident from the current new developments that the levels of child yield are not as high as previously anticipated.
- 3.4 In last year's report on pupil place planning the council cabinet was informed of the LA's plan to undertake a review of its primary school places. The aim of the review was to identify long-term solutions to reduce the significant number of surplus places in the west of the borough, whilst ensuring that schools remained financially sustainable and able to maintain high quality education. Progress on the review has previously been reported to the Mayor's Advisory Board and also to elected members through two focussed seminars, the members' bulletin and individual letters to the members for the ward constituencies of the schools concerned. As the review reaches its conclusion, parents and the public are being kept informed through the 'Parents Matters' newsletter, direct correspondence from the LA and schools and through the council's dedicated website [here](#).
- 3.5 The initial findings from the review identified that a number of schools were already facing significant declines in their pupil roll and therefore financial challenges. This included some schools having to apply to the LA for a licensed deficit and the LA then having to establish whether or not the school would be able to repay the deficit over the now necessary three year period. In certain cases, it became evident that these schools would not be able to recover to a financial position that would enable the LA to be confident of their long term viability.
- 3.6 The review therefore included an independent consultant working with schools and the diocesan bodies to develop proposals for organisational changes, based on a set of principles agreed with the stakeholder advisory group overseeing the review process. The consultant's report on the first part of this process recommended a new model of school organisation based on 'educational communities'. Under this model, groups of neighbouring schools would work together to reduce the number of school places in their local area

as well as optimise their resources and potential to deliver excellent education. It included schools exploring options, such as, amalgamation, hard federation and the possibility of relocation to new primary school sites planned for the pupil growth that is expected in the East of borough. The options also, reluctantly, included the LA and school leaders considering schools closures, in cases where it was evident that the continuance of the school was no longer viable or financially sustainable and, where a decision to keep it open would have a negative impact on pupils' progress and attainment. However, decisions that involve the potential for a school to close will seek to ensure that the pupil's educational experience is maintained, through the process of an amalgamation with a neighbouring school.

- 3.7 The process of the review was purposely designed to enable school leaders to find their own solutions and work towards these with the support of the LA and the independent consultant. It has therefore provided better options to further develop partnerships and meaningful collaborations between schools, with the opportunity for genuine gains in shared learning and professional development as a result. The key involvement of the Tower Hamlets Education Partnership to complement this approach supports the LA's ambitions as it continues to work towards a productive school system that has professional learning and improvement at its front and centre. The feedback from schools during the process will provide invaluable evidence to inform school organisation and education policy-making going forward.

**(a) Plans following the outcome of the review**

- 3.8 Below is the current position within each school catchment area and the plans for reducing or increasing the Planned Admission Numbers (PANs) for schools, following the outcome of the primary review:

**Catchment Area 1 (Stepney)**

There are currently 840 Reception places available in Stepney. In January 2019 there were 110 (4FE) unfilled places and this is projected to rise to 141 (5FE) by 2027. Plans to reduce this surplus are outlined as follows:

Plan	Responsible Agency and Timescale	PAN Reduction
The amalgamation of Redlands (2FE) and Smithy Street (2FE), whereby Smithy would close and its pupils transfer to Redlands. Redlands would expand to 3FE to accommodate the pupils from Smithy.	The schools governing bodies have undertaken an initial, informal, consultation with their communities. Following its positive outcome, the LA is now asking the Mayor in cabinet to agree to the issuing of a statutory notice formally consulting on the schools amalgamation, to take effect from September 2020.  The outcome of the statutory notice proposal will be reported to the Mayor in cabinet for a final decision to be taken on the schools amalgamation in February 2020.	Reduction of 1FE (30 places)

Reduction to the PAN of Cayley School from 3FE to 2FE	The LA will consult on this change for the start of the next school year.	Reduction of 1FE (30 places)
The amalgamation of Guardian Angels (1FE) and St Annes RC (1.5FE), whereby Guardian Angels would close and its pupils transfer to St Anne's RC.	The RC Diocese and school governing bodies are working to implement this proposal for start of the school year 2020/21. The outcome will be reported to the Mayor in cabinet in February 2020.	There will be reduction of 20 places by 2022.

### Catchment Area 2 (Bow)

There are currently 450 Reception places available in the Bow catchment area. In January 2019 there were 42 (1½FE) unfilled places and this is projected to rise to 86 (3FE) by 2027. Plans to reduce this surplus are outlined as follows:

Plan	Responsible Agency and Timescale	PAN Reduction
A reduction to the PAN of Malmesbury School from 2½ FE to 2FE	The LA will consult on this change for the start of the next school year.	Reduction of 0.5FE (15 places)
To reduce the PAN of Olga from 3FE to 2FE	The LA will consult on implementing this change for the start of the next school year.	Reduction of 1FE (30 places)

### Catchment Area 3 (Poplar)

There are currently 890 Reception places available in the Poplar catchment area. In January 2019, there were 44 (1½FE) unfilled places; but with anticipated growth in the pupil population, this area is expected to have a shortfall of 122 places (4FE) by 2027. The current plans to address this potential shortfall are as follows:

Plan	Responsible Agency and Timescale	PAN Increase
Increase to the PAN of Mayflower School from 1½ FE to 2FE	The LA is currently developing its plans to expand Mayflower to ensure the additional capacity can be available from as early 2022.	An increase of 0.5 FE (10 places)
To increase the PAN at St Saviour's CE School from 1FE to 2FE	The LA is working with the London Diocesan Board and the School's Governing Body to develop plans to expand the existing school on site.	An increase of 1FE (30 places)

The LA will explore the potential to expand other existing schools in the Poplar area, as and when it can be more certain about the projected levels of child yield resulting from the planned housing developments in this area.

#### **Catchment Area 4 (Isle of Dogs)**

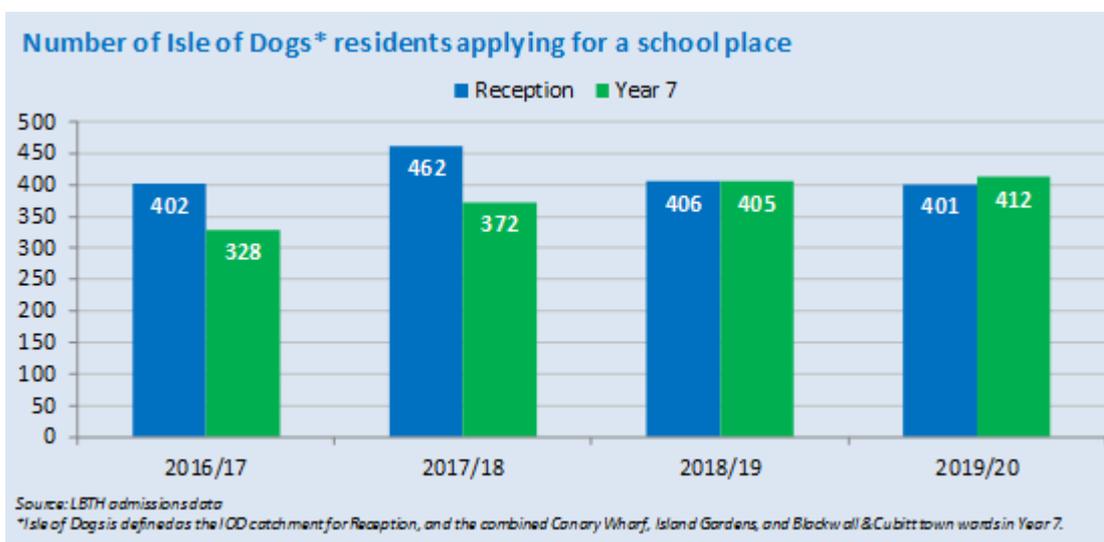
There are currently 441 Reception places available in the Isle of Dogs catchment area. In January 2019 there were 15 (0.5FE) unfilled places. However, with anticipated growth in the pupil population, this area is expected to have a shortfall of 156 places (6FE) by 2027.

The plans to address this potential shortfall are as follows:

<b>Plan</b>	<b>Responsible Agency and Timescale</b>	<b>Pan Increase</b>
New 2FE School at Wood Wharf.	Cabinet has already agreed to open this new School from as early as September 2022, subject to the new housing development generating the level of child yield needed to sustain a 2FE primary school from the outset.	Increase of 2FE (60 places)
New 2FE School at Millharbour.	LA has taken up the s106 option to develop new 2FE school at Millharbour. The planned timescale for the school to open is September 2025. Cabinet will be asked to approve the funding and arrangements for the delivery of this new school in due course.	Increase of 2FE (60 places)

The LA is working on the development of further new school sites in the Isle of Dogs area, but in the next 18 months will decide with developers on the precise timescales for bringing these sites forward for 2027. These timescales will be informed and determined by the levels of child yield resulting from the planned housing developments in this area.

It is important that the LA takes a cautious approach to further new school developments in the Isle of Dogs, given that it is clear from the current school admissions data that housing and population growth in this area is not resulting in the expected increased demand for school places. The number of Isle of Dogs residents applying for a Reception place has actually fallen in the past two years, and there has been very modest growth in the number of residents applying for a Year 7 place (see chart below).



The number of schools sites already secured through the Local Plan will therefore provide opportunity and the necessary flexibility to meet fluctuations in demand as well as determine the options for improving the existing schools estate.

### Catchment Area 5 (Wapping)

There are currently 480 Reception places available in the Wapping catchment area. In January 2019 there were 62 (2FE) unfilled places and this is projected to rise to 92 (3FE) by 2027. Plans to reduce the surplus are outlined as follows:

Plan	Responsible Agency and Timescale	PAN Reduction
To reduce the PAN of Canon Barnett School from 1½FE to 1FE	The LA will consult on implementing this change for the start of the next school year.	Reduction of 0.5FE (15 Places)
The LA has not yet fully developed its proposal for the future of Shapla School, but is currently working with school leaders on the potential for Shapla to partner with a neighbouring school, in order to further reduce the surplus in the Wapping area.	The LA will present recommendations for decision by the Mayor in Cabinet in February 2020.	Reduction of 1FE (30 places)

### Catchment Area 6 (Bethnal Green)

There are currently 660 Reception places available in the Bethnal Green catchment area. In January 2019 there were 132 (4FE) unfilled places and this level of surplus is projected to continue through to 2027. Plans to reduce the surplus are outlined as follows:

<b>Plan</b>	<b>Responsible Agency and Timescale</b>	<b>PAN Reduction</b>
The possible amalgamation of Christchurch (1FE) and St Matthias (1FE) Primary Schools.	The London Diocesan Board and school governing bodies are working towards implementing this proposal for start of the school year 2021/22. The outcome will be reported to the Mayor in cabinet in February 2020.	Reduction of 1FE (30 places).
To establish a Hard Federation between Hague and Stewart Headlam Schools, whereby the schools would then come under a single governing body. This will include a reduction to the PAN of Stewart Headlam from 2FE to 1FE.	The governing bodies of both schools are currently working towards the schools federating from January 2020 and the LA will consult on reducing the Stewart Headlam intake for the start of the school year 2020/2.	Reduction of 1FE (30 places)
To reduce the PAN of Bangabandhu Primary School 2FE to 1FE	The LA will consult on implementing this change for the start of the next school year.	Reduction of 1FE (30 Places)

- 3.9 The changes to Planned Admission Numbers (PANs) and catchment area capacities will see a reduction of 260 (8.5FE) reception places in the West of the borough and the addition of 160 (5FE) reception places in Poplar and Isle of Dogs catchment areas by 2025. They have been considered in the context of the effects on local provision, including looking at school recruitment patterns and ensuring that the knock-on effects in the adjustment of PANs is considered within the context of the necessary equalities considerations.