

<b>Agenda Item</b>	<b>13</b>
<b>Report No</b>	<b>ECI/48/2021</b>

## **HIGHLAND COUNCIL**

**Committee:** **Economy and Infrastructure**

**Date:** **2 December 2021**

**Report Title:** **School Transport Transformation Project  
(Review of school transport)**

**Report By:** **Executive Chief Officer Infrastructure, Environment & Economy**

### **1. Purpose/Executive Summary**

- 1.1. Funding was secured from the Council's Change Fund for an audit and review of the Council's school transport arrangements, covering compliance with policy and legal duties, ways of reducing costs, and alternative methods of provision.
- 1.2. The TAS Partnership (a specialist passenger transport consultancy) was commissioned to carry out the review. This report outlines their findings, along with some other aspects of the school transport function. TAS's review is wide-ranging, covering legal compliance, eligibility, cost pressures, options for making savings including alternative means of provision, operational practices and safety. A high-level summary report has now been received and is attached. A full, detailed technical report is imminent.
- 1.3. TAS were not asked to review the cost-effectiveness of individual routes but were given details of all routes operating. Their review is therefore informed by specific cases but applied in the general context of policy and practice. While this report includes some specific recommendations, more detailed analysis will be needed how to implement several aspects of the review.

### **2. Recommendations**

- 2.1. Members are asked to:-
  - i. note that the summary report from The TAS Partnership (attached) will be supplemented by a detailed final report;
  - ii. agree to the following recommendations from the TAS report:-
    - continue to develop community transport solutions for school transport where appropriate;

- apply existing policy to further Gaelic Medium catchment areas as they are defined;
  - develop parental budgets and/or shared parental arrangements where these are found to be cost-effective;
  - support or develop child protection awareness training for drivers;
  - support or develop wheelchair safety training for drivers and escorts;
  - provide schools with transport site risk assessment tools and guidance;
  - transport Unit staff to assist the Education Service in reviewing school catchment areas where there is potential to reduce transport costs; and
  - procure a contract management software system.
- iii. agree that the following items should be reviewed in detail, involving staff of other Services as appropriate, and a further report be brought to Committee:-
- conditions of contract, and contract monitoring capacity and processes;
  - analysis of ASN transport policy, costs and processes;
  - scope for expansion of in-house transport provision;
  - feasibility of providing bicycles as an alternative to transport provision for some pupils;
  - appeal process for road safety decisions; and
  - environmental and sustainability implications of the school transport policy.
- iv. invite TAS to make a presentation on their report to the next meeting of the Committee;
- v. agree that a bid be made to the Change Fund to support the staffing resource required to implement the recommendations above; and
- vi. agree that future budget reporting should identify the element of public transport costs which are attributable to school transport.

### 3. Implications

- 3.1. **Resource** - The report identifies areas for potential cost saving over time. Some elements will require initial outlay in order to achieve continuing savings. Factors leading to upward cost pressures on transport provision are also identified. There will be a one-off resource requirement to procure a contract management system. Dedicated staffing resources will be necessary to develop and implement the items listed in recommendation iii.
- 3.2. **Legal** - The report confirms legal requirements around provision of school transport.
- 3.3. **Community (Equality, Poverty and Rural)** - School transport is predominantly provided in smaller communities and rural areas. The recommendations support provision of an equitable service of appropriate standard.
- 3.4. **Climate Change / Carbon Clever** - The Council's current school transport policy does not currently refer to environmental sustainability. This should be considered as the policy is revised and updated.
- 3.5. **Risk** - If mitigating actions such as described in this report are not taken to address increasing contract costs and other factors such as driver shortages, there is a risk of the Council being unable to fulfil its statutory duty to provide school transport.

- 3.6. **Gaelic** - The current policy for Gaelic Medium school transport is found to be logical and consistent with Government guidance.

#### 4. **Background**

- 4.1. Home to school transport provision is a statutory function of the Council, with almost 9000 pupils being transported daily. The Education (Scotland) Act 1980 stipulates that provision must be made for pupils aged under 8 years who would have a walking distance to school of over 2 miles, and for other pupils whose walking distance would be over 3 miles. This applies to pupils attending their catchment area school. It does not apply to placing request pupils. Provision may be made by:-

- Provision of transport, free of charge;
- Making bicycles or other suitable means of transport available to the pupils, or to pay money to parents for this purpose; and
- Paying the whole or part of their reasonable travelling expenses.

Currently, most eligible pupils travel on contracts arranged by the Council, but some, especially in remote areas, are driven to school by their parents under parental expenses arrangements.

- 4.2. The school transport function has a large budget totalling over £14.5m. £10.215m of this is for dedicated home to school transport routes. A further £4.460m is the estimated proportion of the public transport contract costs which is attributable to inclusion of home to school transport provision within public routes. Previously this was recharged to the Care & Learning Service (as it then was), but since the entire transport budget was moved to Community Services and now the Infrastructure, Environment & Economy Service, this amount has been included in the public transport (subsidies and concessionary fares) budget reporting and therefore not been identified as a school transport cost. To show the position more clearly, and to improve accuracy in national reporting of budget figures, it is recommended that a further budget line should be added for this element of the provision.
- 4.3. As part of the Transformation Programme, The TAS Partnership (a specialist passenger transport consultancy) was commissioned to review the Council's school transport policies and practices. They have done a detailed analysis and have had discussions with Transport Unit staff throughout the process. Education and Procurement staff have also been involved where required.

#### 5. **Assessment**

- 5.1. TAS's proposal is attached in **Appendix 1**, and their summary report in **Appendix 2**. Their analysis and recommendations cover three broad areas: a review of the effectiveness of existing policy and practice, options for alternative methods of provision to enable cost savings, and operational changes to improve the overall standard of service. Key issues for costs and operations are described later in this report.
- 5.2. TAS have confirmed that our policies meet the Council's statutory duties and government guidance and are not more generous than those of other Scottish authorities. They have confirmed that where discretion to provide transport exists, the policies set out how discretion is limited and the processes to do this are generally effective and in line with best practice.

5.3. The report identifies positive features of the school transport function in Highland, including:-

- good practice in determining eligibility for transport, both in measuring distances and in assessing safe walking routes;
- local knowledge in the team, and local liaison with schools and parents;
- use of a Dynamic Purchasing System for procurement;
- innovative and effective use of community transport;
- effective use of in-house minibuses;
- integration with public transport routes;
- generally good relationships with contractors;
- approach towards Gaelic Medium transport is logical and consistent with guidance; and
- sophisticated use of Excel for maintaining records, linked to GIS.

5.4. Negative features have also been identified, including:-

- lack of any specialist software for contract planning and management;
- absence of electronic records to show actual use of transport by entitled pupils;
- lack of consistent approach to operational service quality and monitoring (as monitoring is generally reactive);
- a need for improved driver training and vehicle and equipment testing for ASN transport;
- no statement in the policy about environmental sustainability; and
- no active research into user satisfaction.

5.5. Opportunities for development and improved practice have been identified, including:-

- independent Travel Training;
- provision of bicycles as an alternative to transport contracts;
- offering parental or student travel budgets (this would be a broadening of scope beyond the current parental expenses payments), or shared parental arrangements; and
- option of operation-only contracts (using vehicles supplied to contractors by the Council), to improve competitiveness.

5.6. TAS have compared Highland's school transport costs with other rural Scottish authorities using published figures. This shows Highland in 6<sup>th</sup> place out of 10 mainland authorities at a cost of £331 per pupil on the school roll. (Average cost across these 10 authorities is £342.) Costs in the island authorities are significantly higher. A number of caveats must be applied, not least that these figures are based on the number of pupils enrolled, not the number receiving transport, and that no account is taken of journey distances or sparsity of population. More detailed analysis of other authorities would be required to enable more effective benchmarking, but TAS have stated that Highland "comes within the range of costs that can reasonably be expected".

5.7. TAS have offered to make a presentation to the next meeting of the Committee and to answer questions from Members.

## **6. Cost analysis and financial pressures**

6.1. Several challenges regarding school transport were reported to the Recovery, Improvement and Transformation Board on 4 October, with mitigations described. This largely drew on TAS's work. The major challenge is to reduce revenue costs associated with school transport. Ten mitigations were proposed, as follows:-

1. review processes around determination of ASN transport eligibility and appropriateness of transport modes offered, taking costs into account and with a view to increasing personal independence;
2. develop bicycle and e-bicycle offer within the travel support portfolio;
3. promote a more flexible parental / student direct payment offer, particularly for ASN pupils/students;
4. develop and promote a more effective Independent Travel Training offer;
5. review the policy in respect of transport to Gaelic medium education;
6. sample route review at a mainstream and ASN school to confirm efficiency;
7. re-institute (suspended under Covid-19) supplier market development initiatives to increase commercial competition;
8. continue tactical use of in-house provision where excess prices are offered. Large-scale expansion of this service is inappropriate as this would add to costs because of local authority employment terms for drivers and the absence of off-peak work to share fixed and overhead costs;
9. continue to promote and support community transport groups to deliver school transport as a component within an integrated service offer; and
10. review the transport appeals process to ensure that road safety criteria are made clear and that decisions are strictly in line with legislation and Council policy.

6.2. Clearly these issues will require detailed work to progress. Areas for potential cost reduction have been identified, but none of them can be regarded as quick wins. Continued funding through the Change Fund is proposed to provide a dedicated staffing resource within the Transport Unit enabling these issues to be progressed.

6.3. Other challenges presented to the RITB, which are likely to lead to increased costs, are shown in the following table:-

<b>Challenge</b>	<b>Mitigation</b>
Shortage of bus drivers – potential loss of service / increased costs	Examine potential for a driver training initiative using apprenticeship / skills development funds
Extension of EU drivers' hours to non-PSV operation (Council / CT) – increasing costs, reducing volunteers	Consider an employment contract model that would allow a call-off list of 'retained' drivers available to work on a zero-hours basis
Sustainability of the core public bus network given impact of Covid-19 and reduction in commuting and shopping trips – risk of increase in support costs to maintain services also used to provide school transport	Maintain close information exchange with bus operators and work to maximise access to national support funding and seek marketing opportunities.
Likely contract inflation at retendering reflecting recent operator financial performance and fleet age profile in Highland	Introduce longer contracts to allow vehicle reinvestment to be spread and risk reduction for operators

	Introduce automatic inflation indexing into the contract conditions to avoid the need for operators to future-proof their tenders
	Consider 'operation-only' contracts using council-provided vehicles. Would also deliver earlier uptake of zero-emission vehicles
	Review approach when the next round of tenders (Skye & Lochaber) are received
Decarbonisation requirements	Ensure that active travel initiatives target entitled scholars as well as non-entitled
	Provide CTs and Car Clubs with E-MPVs with priority availability for school transport

- 6.4. Tender prices nationally are increasing above inflation, due to fuel price increases, driver wages and the economic impact of Covid-19. In the Highland context, whereas we achieved an 11% reduction in tender prices at the last major round of retendering in 2016/17, experience since has shown that a number of prices accepted at that time were unsustainable, and the effect of these savings is now being felt in upward pressure on the budget.

## 7. Issues addressed in TAS report

### Procurement

- 7.1. Competition is constrained by the geography of the Council area. There is a large number of contractors, but almost all of them are small-scale and operating only in a local area. Although TAS have stated that much of what the Council does is already good practice, they have recommended a number of improvements to our Conditions of Contract, as well as ways developing the commercial market to increase competition, for example by supporting driver training.

### ASN transport

- 7.2. Transport for pupils with additional support needs is a significant area of cost. Although only 4.8% of pupils receiving transport are on routes contracted for ASN reasons, they amount to 11.3% of the total cost of provision. Education legislation requires that local authorities make adequate and efficient provision for the additional support required for each child or young person with additional support needs for whose school education they are responsible, and to keep under consideration the additional support needs identified and the adequacy of support provided.
- 7.3. A key issue identified in the report is the consistency and robustness of decision making on eligibility for ASN transport (which inevitably requires assessment of individuals' needs), and periodic review of these decisions. While the budget is held by the Transport Unit, eligibility decisions are made in the Education Service. Scope for, and benefits of, Independent Travel Training for older pupils should form part of such periodic reviews.

- 7.4. Operational standards of some ASN transport provision have also been assessed, leading to recommendations for improved specification and training.
- 7.5. The topic of ASN transport was the subject of a LEAN review in 2019, which was then subsumed into a broader LEAN review of the ASN function as a whole. This work was suspended on the outbreak of the Covid-19 pandemic. It is recommended that the review of the assessment process for ASN transport need is resumed, along with the other issues identified by TAS.
- 7.6. Although the policy states that transport is not provided to nurseries or pre-school education, this is in fact provided for some ASN children. This position should be reviewed along with other ASN aspects.

#### Gaelic Medium transport

- 7.7. Pupils attending Gaelic Medium education are transported along with English Medium pupils wherever practical (for example, where the same bus can serve a secondary school and a Gaelic Medium primary). 4.2% of pupils receiving transport are entitled due to attending a Gaelic Medium school or department; these account for 2.8% of the total cost.
- 7.8. The legal position regarding entitlement to Gaelic Medium transport is not specifically defined. However, Councils do have a duty to define catchment areas for Gaelic Medium schools or departments, and it should be noted that the Education (Scotland) Act 2016 places a duty on education authorities to promote and support Gaelic Medium Education, so far as is reasonably practicable.
- 7.9. Where school catchments have been defined, entitlement to Gaelic Medium transport generally follows the catchment areas, although in some cases, outlying parts of the catchments are excluded where this would make journeys excessively long. It is recommended that as further catchment areas for Gaelic Medium are defined, this approach should also be used for these areas.

#### Road safety considerations and entitlement reviews

- 7.10. The Council has a statutory duty to consider safety when deciding whether to provide transport; in practice this applies when the walking distance is less than the statutory limits. A well-established process exists for doing this, and the Education Transport Entitlement Review Sub-Committee is convened when required to consider cases which have not been concluded at an earlier stage. Despite this, the criteria for assessing route safety and the appeal process itself are not always well understood by the public. A need has also been recognised to review the mechanism for considering appeals, with more emphasis on the road safety criteria applied and the legal issues involved.

#### Alternative means of provision

- 7.11. The Council's tactical use of in-house provision is supported, but the review cautions that in-house operation cannot be considered as a large-scale strategic solution. There is, however, potential to expand the current operation were justified in specific locations. Transport Scotland are currently preparing guidance for local authorities on the implementation of aspects of the Transport (Scotland) Act 2019, including in-house operation.

- 7.12. In a technical note provided to Transport Unit staff, TAS have given detailed advice on the potential, and constraints, on the use of community transport. Although not applicable to all situations, this is an area with potential for further expansion. Implementation of specific schemes is resource-intensive in staff time, as it involves working with local groups and developing community capacity, but the benefits can be significant, both in cost saving and in increasing availability of transport in the local area in the off-peak.
- 7.13. TAS have proposed provision of parental budgets as an extension of our existing system of parental expenses payments. This approach would be more flexible than simply a mileage payment for the use of the parent's car. One option would be to support shared parental arrangements, where a small group of parents would collaborate in the driving duties for their children. Further work is required to define where parental budgets would be appropriate, and the parameters for them, but it is likely to be applied where contracted transport is difficult or expensive to source.
- 7.14. Provision of bicycles, or grants towards them, is seen as an option, particularly in the summer months, where distances are relatively short and where safe routes are available. Investment in cycling infrastructure would be required to eliminate the need for routes which are provided on the grounds of road safety rather than distance, and the approach may also be suitable for journeys which are slightly longer than the maximum walking distance criteria. This will require assessment of individual routes but can yield benefits not only in cost saving but also in carbon reduction and health promotion through increased physical activity. It should be accompanied by suitable safety protection and Bikeability training.

#### Operational issues

- 7.15. TAS have made recommendations on a number of operational issues, including training for drivers and escorts in child protection awareness training and wheelchair safety. It is recommended that these be taken forward with the relevant staff.
- 7.16. Contract monitoring is listed as an area where a more consistent approach is needed, to ensure that service quality is maintained. This also has benefits in identifying ways in which services can be adapted to suit changing needs, including uptake of transport being less than the number of entitled pupils on the route.

#### Information systems

- 7.17. The report recommends procurement of a specialist software system for contract management, to provide functionality beyond the capability of the Excel system currently used. This would aid route planning, option appraisal and testing, record-keeping, data exchange with external systems including Education's SEEMIS database, report creation, and analysis of data, both on contract performance and reasons for changes in costs.

### **8. Other issues**

#### **8.1. Dual zones**

A small number of pupils live in areas which overlap between two school catchments, and therefore may be entitled to transport to either school; these are generally legacy arrangements arising from previous school closures. Some such cases have been addressed in past years, but a few others remain.



Changes to school catchment definitions are actioned by the Education Service following a process defined in legislation. It is recommended that Transport Officers work with Education colleagues to prepare proposals for reallocating dual catchments to a single school in each case.

## 8.2. Free travel for persons under 22

New legislation provides for free bus travel within Scotland for people aged under 22 from 31 January 2022. Implications of this are described in a separate report to this Committee. Regarding school transport, the potential impacts are on travel by pupils within statutory walking distance of their school, and those travelling from outwith their school catchment. The Scottish Government intends to review the effect on funding streams and school transport budgets after the first year of the scheme's operation.

Designation: Executive Chief Officer Infrastructure, Environment & Economy

Date: 12 November 2021

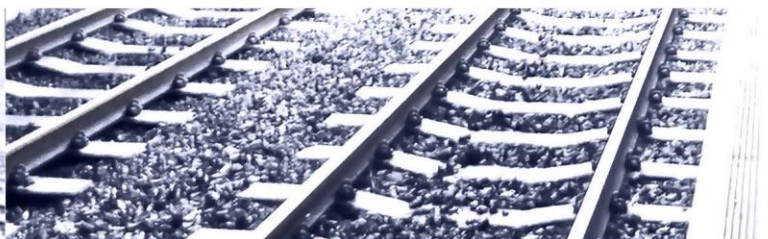
Author: David Summers, Principal Transport Officer

# School Transport Review

A proposal to The Highland Council



March 2021



**The TAS Partnership Limited**  
Passenger Transport Specialists

# Quality Assurance

---

## Document Management

<b>Document Title</b>	School Transport Review		
<b>Name of File</b>	PRO THC School Transport Review 130321		
<b>Last Revision Saved On</b>	12/03/2021 17:40:00		
<b>Version</b>	v1		
<b>Prepared by</b>	JT		
<b>Checked by</b>	SH		
<b>Approved by</b>	SH		
<b>Issue Date</b>	12 March 2021		

## Copyright

The contents of this document are © copyright The TAS Partnership Limited, with the exceptions set out below. Reproduction in any form, in part or in whole, is expressly forbidden without the written consent of a Director of The TAS Partnership Limited.

Cartography derived from Ordnance Survey mapping is reproduced by permission of Ordnance Survey on behalf of the Controller of HMSO under licence number WL6576 and is © Crown Copyright – all rights reserved.

Other Crown Copyright material, including census data and mapping, policy guidance and official reports, is reproduced with the permission of the Controller of HMSO and the Queen's Printer for Scotland under licence number C02W0002869.

The TAS Partnership Limited retains all right, title and interest, including copyright, in or to any of its trademarks, methodologies, products, analyses, software and know-how including or arising out of this document, or used in connection with the preparation of this document. No licence under any copyright is hereby granted or implied.

## Freedom of Information Act 2000

The TAS Partnership Limited regards the daily and hourly rates that are charged to clients, and the terms of engagement under which any projects are undertaken, as trade secrets, and therefore exempt from disclosure under the Freedom of Information Act.

The TAS Partnership Limited often uses commercially or personally sensitive data provided under confidentiality agreements by third parties to inform projects, and disclosure of this information could constitute an actionable breach of confidence. This detailed content is therefore likely to be exempt from disclosure under the Act.

Consequently, The TAS Partnership Limited will expect to be consulted before any content of this document is released under a Freedom of Information request.



**The TAS Partnership Limited**  
Passenger Transport Specialists

Guildhall House  
59-61 Guildhall Street  
Preston PR1 3NU  
Telephone: 01772 204988  
Fax: 01772 562070  
info@taspartnership.co.uk  
[www.taspartnership.co.uk](http://www.taspartnership.co.uk)

# Contents

---

1	Understanding the Brief.....	3
1.1	Introduction.....	3
1.2	Context.....	3
1.3	The Brief.....	6
1.4	Structure of this Proposal.....	7
1.5	Freedom of Information Act 2000.....	7
2	Why TAS?.....	9
2.1	The TAS Partnership Ltd.....	9
2.2	Work for local authorities.....	10
3	Our Approach.....	13
3.1	Introduction.....	13
3.2	Tasks.....	17
3.3	Meeting the Brief.....	27
3.4	Outputs.....	27
4	Project Management, Timescale and Costs.....	29
4.1	Project Management and Staffing.....	29
4.2	Project Management.....	29
4.3	Covid-19.....	30
4.4	Use of Internal Council Resources.....	30
4.5	Timescale.....	31
4.6	Fee Proposal.....	32
4.7	Safety Inspection Option.....	32
4.8	Study Administration.....	33
4.9	Liability and Professional Indemnity Insurance.....	33
	Appendix A: Optional Safety Checks – Sample Reports.....	35

## 1.1 Introduction

- 1.1.1 This proposal is a response to the Consultant Brief – School Transport Review – First Outline issued by The Highland Council (THC) to us on 23<sup>rd</sup> February 2021 and clarified through discussion with officers from the Council on 3 March.

## 1.2 Context

- 1.2.1 On 5 March 2020, just as the Covid pandemic struck, the Council set a Revenue Budget for 2020/21 to 2022/23. Within this there were some requirements relevant to school transport:

*Theme 1: Making the Council More Efficient:*

*Transport Services: This project will specifically target the following objectives: Full compliance with statutory duties for the safe transportation of children to school; Delivering improvements to the provision of Home/School transport for all pupils through process changes; more effective route planning; introducing collection hubs and renegotiating pricing structures with individual operators; developing mutually beneficial community transport opportunities.*

- 1.2.2 Associated savings targets were:

- 2020/21                £60,000
- 2021/22                £420,000

The project would run alongside an equivalent initiative relating to the grey fleet. Later on, in Phase 5, work is to be undertaken towards greening transport relating to climate change.

- 1.2.3 2020/21 Budget pressures identified included:

- School transport inflationary increase                £475,000
- School transport – existing cost pressure                £200,000

- 1.2.4 Savings Approved in February 2019 included:

- Lean Review of Transport Processes
  - ◆ 2020/21                £5,000
  - ◆ 2021/22                £15,000

1.2.5 The then current budget was stated as £8,815,000. However, we note from the 2018/19 Local Financial Returns<sup>1</sup> that the entry for The Highland Council was:

**Table 1: 2018-19 LFR01 – The Highland Council**

	<b>Pre-Primary</b>	<b>Primary</b>	<b>Secondary</b>	<b>Special</b>	<b>Total</b>
School Transport Incurred Under ss50-51 Education (Scotland) Act 1980	0	£3,699k	£5,442k	£1,105k	£10,246k

We understand that the anomaly may partly be due to the fact that Education holds a separate budget for passenger assistants (escorts).

1.2.6 The Detailed Description of the Savings Proposal was:

*No one who has a statutory entitlement to transport will have it removed under this proposal.*

*Over 8200 pupils have school transport arranged and provided by the Council. Many different providers are involved covering urban and rural areas. Different types of transport are used including buses, mini-buses, taxis and parental routes. This includes contracts for separate transport for pupils travelling individually, costing £135k annually (this includes 5 contracts costing over £10k per pupil per annum).*

*To be effective from the new School Term in August 2020, a review of school transport contracts is already underway to identify efficiencies. This will include transport arrangements to nursery, primary, secondary, Gaelic medium and special schools. The review will include all types of transport provided. The review will involve:*

- a review of needs;*
- a review of routes, supported by new route optimisation software;*
- a review of provision;*
- a review of shared transport;*
- a review of contracts;*
- partnership with community transport groups where possible;*
- where appropriate, replacing or removing discretionary provision; and*
- compliance with Education Acts, the Equality Act and road safety.*

*The review will identify more cost-effective ways to provide what is needed. The Transport Team have a good track record in developing innovative approaches to community transport that support needs better and are more sustainable (e.g. Gairloch community transport which includes school transport provision).*

<sup>1</sup> Collected as part of the Scottish Local Government Finance Statistics (SLGFS) publication- LFR 01: Education

*The scope of the review would include all pupil transport and nursery transport. There are significant discretionary transport arrangements in place and these vary across localities and areas. Some arrangements have not been reviewed recently and require attention as pupil needs change and develop continually. The review will remove discretionary travel, use route optimisation tools and ensure that decisions made are equitable across the Highlands.*

*We know that the geography of the Highlands and the shortage of private contractors can lead to some individual contracts being very expensive – for example in some areas taxi costs can be over £20k per annum for individual pupils to be transported to school and back each day – often over not very long distances. The Review will look at more cost-effective options for ensuring children are safely transported to school in a way that is appropriately tailored to their needs, considering opportunities for community transport, supported parental transport and even insourcing where this presents an opportunity for improved value for money whilst also delivering the Council’s statutory requirements.*

*Where appropriate, needs assessments for young people will ensure there is a focus on enablement and developing confidence and independence to prepare for life after school.*

*There will also be a greater focus on regularly reviewing requirements so that transport provision is pro-active in response to changes in need. Contracts that are no longer required will be terminated sooner and changes (whether to increase or decrease provision) will be identified with more notice to reduce the charges imposed by contractors for short notice alterations of contract terms.*

*Maintaining safety will continue to be of critical importance for this review.*

*There are opportunities to identify a reduction in carbon emissions from new arrangements; either from fewer journeys (where more transport can be shared for example); or in the use of vehicles (more electric vehicles for example).*

#### 1.2.7 Impact screening suggested:

*Equality groups: Screening for equality impact indicated there may be a negative impact for pupils with disabilities affected by the review. This would occur if a service was withdrawn without reasonable alternatives identified and, as this is not the intention of the review, a full impact assessment has been initiated which has indicated the need for further analysis of pupil, transport and route data which will be integral to the review. Specific review proposals must take equalities impacts into account. This is not about removing transport for pupils with complex additional support needs: this will continue. The saving will however look at more efficient route planning, sharing of vehicles and alternative providers.*



*Rural: No adverse impact on rural areas. The review will apply to all areas of Highland. It will continue to meet statutory requirements. Where possible, opportunities will be explored to improve services in rural areas. For example, in Gairloch the Council is now supporting a community transport group to deliver school transport and the Council-provided vehicle is also available to deliver community transport at other times. The cost of this provision is less than it cost to use a private transport provider so this approach has delivered a saving to the Council whilst ensuring the service to the children is maintained and there is a benefit to the wider community. This approach is being looked at in other Highland areas where there are established transport groups.*

*Socio-economic: Screening was undertaken for socio-economic impacts. This highlighted potential negative impacts on household resources if transport is withdrawn from certain pupils and potential negative impacts on people's life chances if there is a risk of reduced access to education. It also identified that lone parents, unemployed people, young children, low-income households and disabled people may be negatively impacted. However, the review would identify reasonable alternatives to any withdrawal of current transport arrangements. Specific review proposals will take these impacts into account.*

1.2.8 Timescale and Process were set out as follows:

*Actions, Investment, Cost and Timescale for Delivery: There is currently a Transport Change Project, with change funding and a team in place. The scope of its work will broaden to include the review areas set out above. The changes required will be progressed to start from the start of the new school year in August 2020. This provides time to engage with pupils, parents and schools affected. Some savings may need a longer lead in time and are shown for year 2.*

1.2.9 However, the impact of Covid on school education and the associated transport arrangements has been significant. Consequently, various of the proposed actions and the associated savings targets have been put back a year.

## **1.3 The Brief**

1.3.1 Our understanding is that a high level review of all aspects of school transport is required in order to:

- a) Identify any potential for economies and efficiencies, whilst maintaining service quality and legal compliance;
- b) Improve understanding of the cost drivers associated with school transport so that they can be better managed;



- c) Examine the planning and delivery processes and reporting arrangements to provide assurance that they are fit for purpose and provide best value.

The review is to cover both demand-management and supply-side issues.

1.3.2 Areas to be addressed including those specifically identified in the brief include:

- a) Identification and costing of discretionary provision and comparison with other authorities.
- b) The process of eligibility assessment, particularly in respect of children with ASN. This covers both the requirement for travel assistance generally but also the assessment of the appropriate type of travel assistance.
- c) Provision and management of passenger assistants.
- d) Managing and incentivising the transport supply market, and the mix between commercial, community-based and in-house provision.
- e) The potential for alternative methods of delivery, including parental grants, independent travel training and the potential for parent-led school travel clubs.
- f) Advice on the selection and procurement of a suitable transport management software system.

## **1.4 Structure of this Proposal**

1.4.1 This proposal is structured as follows:-

- Section 1 provides an outline of our understanding of the requirement.
- Section 2 provides a brief outline of our background, client profile, skills base and operating ethos, together with an overview of our past work in this area that we believe gives us more direct experience than any other organisation in Britain to undertake this school transport review
- Section 3 details our overall approach and the specific tasks required to deliver this project.
- Section 4 outlines our management and communications approach, the staff we would propose to allocate to this project, together with our fee proposal to undertake the work.

## **1.5 Freedom of Information Act 2000**

1.5.1 The TAS Partnership Limited regards the daily and hourly rates that are charged to clients, and the terms of engagement under which any projects are

undertaken, as trade secrets, and therefore exempt from disclosure under the Act.

- 1.5.2 In many of the Reports and Task Notes we produce, The TAS Partnership Limited uses commercially or personally sensitive data provided under confidentiality agreements by third parties to inform projects, and disclosure of this information could constitute an actionable breach of confidence. The detailed content of such Reports and Task Notes is therefore likely to be exempt from disclosure under the Act.
- 1.5.3 Consequently, The TAS Partnership Limited will expect to be consulted before any content of our Reports and Task Notes is released under a Freedom of Information request.

## 2.1 The TAS Partnership Ltd

2.1.1 The TAS Partnership is an employee-owned consultancy focused on moving passenger transport forwards across the UK through research, advice and data analysis. With more than 30 years of experience our team of consultants are on hand with wide-ranging knowledge and expertise - from developing government policies to delivering bus network improvements and helping local authorities control their budgets. Our clients include operators of all types and sizes; government and policy-making bodies at national, regional and local levels; local authorities, NHS Trusts, other commissioning bodies across the country and fellow consultants who buy in our skills and experience.

2.1.2 With a sole focus of helping the passenger transport sector we provide research, advice and data analysis across the whole range of ground passenger transport services, including:

- Commercial and Supported Bus and Coach Services
- Mainstream, ASN/SEN, Further and Higher Education Transport
- Adult and Child Social Work Transport
- Community Transport
- Non-emergency Patient Transport
- Demand Responsive Transport
- Taxis and Private Hire
- Rapid Transit, Light Rail and Metro
- Local, Regional and InterCity Rail
- Powered personal transporters

2.1.3 The services we offer include:

- Market analysis and development
- Integrated Transport Unit support
- Bus and coach network design
- Local authority efficiency / effectiveness reviews
- Management/Supervisor training
- School and ASC transport scheduling
- Fleet management improvement
- Fares & ticketing analysis
- Concessionary fares support
- Procurement support

- Health & Safety appraisals
- Policy review and public consultation
- Technical service innovation (e.g. EVs)
- Interim management

2.1.4 TAS is able to offer specialist support and advice to local authorities, based on a solid track record of achievement working with many Councils throughout the UK, and being able to draw on a highly skilled team of staff with direct experience of local authority transport commissioning and delivery.

2.1.5 We are unique in several ways, which we believe offers substantial benefit to clients in our field, because:

- We work within a single field, passenger transport, in which all our expertise is concentrated.
- All our senior employees have substantial practical experience of transport management, planning or operations with local authorities, transport operators or both.
- Our mixture of research, publishing and consultancy within our field provides us with a far more comprehensive knowledge of the passenger transport sector than other consultancies – other consultants purchase and rely on our research and reports.
- Our practical “hands-on” approach is reinforced by arrangements with clients under which senior managers are seconded to us for consultancy projects, or vice versa.

2.1.6 All our work is subject to our Quality Management System, and is independently monitored with confidential client assessments of performance. Our internal procedures include two stages of checking of all our Task Notes and Reports.

## 2.2 Work for local authorities

2.2.1 Our work for local authorities is set out in the following table:

**Table 2: TAS Transport Studies for Public Authorities**

Study	Authority
<b>Cross-departmental Policy and Practice Reviews</b>	Highland, Leeds, Northumberland, Swindon, Telford & Wrekin, Bristol, Rhondda Cynon Taf, Central Bedfordshire, LB Barnet, Stockport, Telford & Wrekin
<b>ITU from inception / base position</b>	Luton, Thurrock, Oldham, Central Bedfordshire, Cheshire East (and Transport Service Solutions)
<b>Best Value</b>	Bristol, Cornwall, Hull, Leicester, Leicestershire, Wiltshire, Salford, York, Scottish Borders, Surrey

<b>Study</b>	<b>Authority</b>
<b>Education transport</b>	Blackpool, Dudley, Falkirk, Poole, Wokingham, Stoke, Ealing, Hammersmith & Fulham, Northumberland, Waltham Forest, Cambridgeshire, Kirklees, Slough, Stockport
<b>Social Services transport</b>	Bradford, Essex, Poole, Wigan, Wokingham, Ealing, Wiltshire, Hammersmith & Fulham, Cambridgeshire, Wokingham, North East Lincolnshire, Falkirk, Aberdeenshire
<b>Developing / introducing a dedicated school bus service</b>	Blackpool, West Sussex, South Dublin, Surrey, Cornwall
<b>Home to school scheduling / GIS</b>	Bradford, Lothian, Manchester, Telford & Wrekin, Stoke, Ealing, Hammersmith & Fulham, Northumberland, Central Bedfordshire, Cambridgeshire, Windsor & Maidenhead, Stockport, Surrey
<b>Contract documentation &amp; procurement processes</b>	Cornwall, Thurrock, York, Wiltshire, Ealing, Hammersmith & Fulham, Rhondda Cynon Taf, Cheshire East, Shetland, Aberdeenshire
<b>Safety / risk assessment</b>	Cheshire, Lothian, Telford & Wrekin, Central Bedfordshire, Luton, Falkirk, Aberdeenshire
<b>Fleet management</b>	Camden, Ealing, Hammersmith & Fulham, Bournemouth, Dorset
<b>Driver / Passenger Assistant Training</b>	Cheshire, Hampshire, Waltham Forest, Wigan
<b>Home to school / college / public transport interaction</b>	Cornwall, Greater Manchester, Northern Ireland, Surrey, Wigan, Telford & Wrekin, Shetland, Stockport
<b>Multi-functional DRT services</b>	Cango (Hampshire), EasyBoarder (Stirling), PlusBus (Camden), Bwcabus (Carmarthenshire), Cheshire West, North Lincolnshire, Northumberland, Surrey (Rural Mobility Fund bid support)
<b>Dedicated accessible transport – dial-a-ride / taxicard, etc.</b>	Hampshire, Merseytravel, Spelthorne, Transport for London, Woking, Essex, Milton Keynes, Surrey, Northumberland, Edinburgh, Bournemouth, Falkirk
<b>Brokerage / corporate procurement</b>	Hart, Leicestershire, Manchester, Rushmoor, Sandwell, South Tyneside, Speke, East Kent, North Wales Partnership, Cheshire East
<b>Transport planning and management ICT</b>	Wiltshire, Central Bedfordshire, Wokingham, Surrey, Aberdeenshire
<b>Health-related transport</b>	Gloucestershire PCT, 2Gether NHS Trust, Shrewsbury & Telford Hospital NHS Trust, Kent Ambulance Trust, Manchester Children’s Hospitals, DITA (Dales)
<b>Total Transport</b>	Northumberland, North East Lincolnshire, Cheshire East
<b>Community transport development</b>	Dales Integrated Transport Alliance, Hampshire, Hull, Lambeth LB, Lancashire, Milton Keynes, Northamptonshire, Northumberland, Stoke-on-Trent, Surrey, Welsh Government, Wrexham
<b>Local Bus Service policy reviews</b>	Blackpool, Cambridgeshire, DRD (Northern Ireland), Essex, Gwynedd, Lancashire, Leicestershire, Oxfordshire, Plymouth, SEStran, Staffordshire, Welsh Government, York
<b>Secured Local Bus Services analysis and planning</b>	Eilean Siar, Falkirk, Gloucestershire, Greater Manchester, Hampshire, Lancashire, South Yorkshire, Shetland, Surrey, Tyne & Wear, West Yorkshire
<b>Bus concessionary fare schemes</b>	Cheshire Boroughs, Cornwall, East Riding, Fareham, Gloucestershire, Lancashire, North Lincolnshire, North Yorkshire Partnership, Northumberland, Poole, Southampton, Surrey, Torbay, West Sussex, York
<b>Park &amp; Ride development</b>	Cheshire West & Chester, Plymouth, South Yorkshire, Suffolk, York
<b>Bus Rapid Transit development</b>	DRD (Northern Ireland), Edinburgh, Luton, Oxfordshire, West Sussex
<b>Taxi regulation</b>	North East Lincolnshire, States of Jersey, Stirling

2.2.2 Where the work has focused on savings, we have consistently identified and, where appropriate, delivered these at above predicted / target rates. This has included all the relevant services in this Transport Review - mainstream and additional / special needs (ASN) home-to-school (H2S) transport, including in-house fleet operation and the use of community transport operators. We are happy to provide details and contacts in the relevant authorities to confirm what we have achieved.

**Table 3: Savings delivered by TAS directly or resulting from our recommendations (last 5 years)**

Year	Authority	Budget	Savings	%
2016	<b>LB Hillingdon</b> TAS was commissioned to provide continuing strategic and technical support involving two work-streams: Re-planning and rescheduling SEN transport routes (savings as stated in column left and achieved following retender), and Strategic Management Support, this task was divided into three elements: staffing and organisation, operation and Performance and service delivery.	£6,606k	£1,000k	15%
2016	<b>Peterborough</b> TAS was asked to schedule the home to school journeys for a set of Peterborough pupils in a more efficient and/or cost-effective way. Figures refer to savings identified from SEN rescheduling.	£1,282k	£135K	11%
2017	<b>Scottish Borders</b> Review of all passenger transport functions and interface between Council and other stakeholders to identify the potential for more external contribution. Covered integration options, network provision, service support hierarchy, operator contracts, and admin arrangements. (Figures quoted refer to savings on Home to School elements of the review only.) Savings achieved in 2018.	£3,352k	£195k	6%
2018	<b>Surrey (Atkins/TAS)</b> The review of SCC's transport provision for SEND (in collaboration with Atkins) investigated seven lines of enquiry, including: policy, eligibility assessment, budget, planning, procurement, operations and monitoring and review. Interventions for each of line enquiry were recommended, ranging in impact, effort and timescales.	£27,800k	£3,948k target	14%
2019	<b>Stockport</b> This review focused on transformation of the current transport delivery for children and young people with SEND (Special Educational Needs and Disability) aged 0-25. We reviewed policy, procurement (assisting with a new DPS), operational safety, schedule efficiency, monitoring and software. Our recommendations were adopted in full.	£2,462k	£220k target	9%

## 3.1 Introduction

3.1.1 The approach that TAS takes to reviews of this nature is developed from our experience of undertaking best value reviews using the methods developed by the Audit Commission. In its reports on local authority transport management, the Audit Commission developed a useful approach to structured thinking about passenger transport organisation which identifies the various components where changes could be made. This is illustrated in the Review Cycle below:

**Figure A: School Travel Review Cycle**



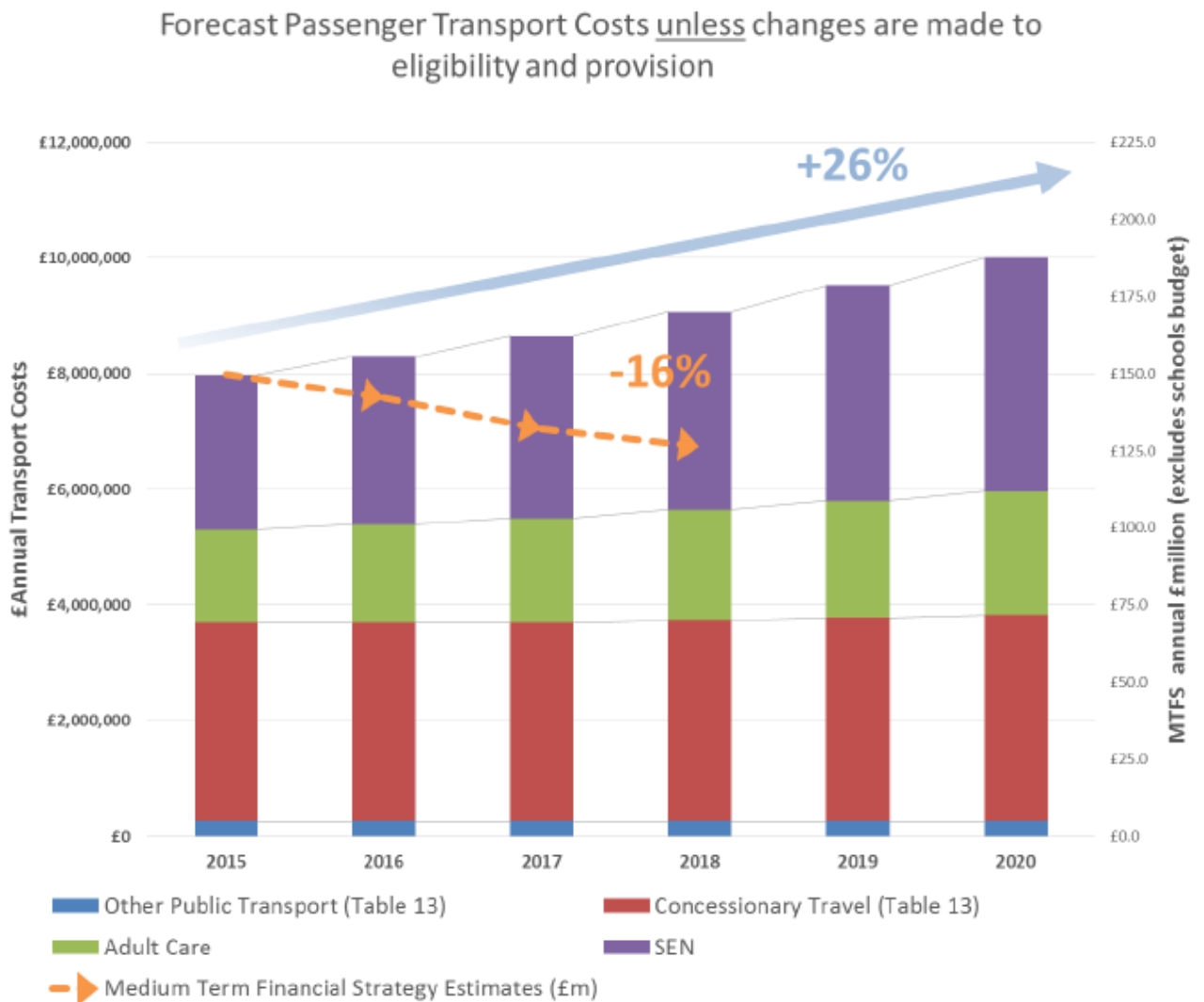
3.1.2 Each element of the cycle contains the potential for improvement and therefore we review each of these in turn against national best practice and the latest developments and approaches in other authorities. It will be seen that the first part of the cycle is concerned with demand management.

3.1.3 A critical issue throughout the cycle is management information – it is only through review that the cycle can be completed and continually improved. A

general problem in local authorities is the lack of management information about service performance and outputs in a form that enables informed strategic or policy decision making. As the Council's budget position tightens, the requirement for performance information will get more pronounced as more and more difficult decisions have to be made about restructuring the service offers.

3.1.4 It is important that all aspects of this cycle are considered, including one of the key cost drivers - demand management - if one is to meet Audit Scotland Accounts Commission's recommendation to assess all available options. The importance of demand management is emphasised by 2016 work for an English unitary authority facing very, very significant financial difficulties – Figure B shows the classic 'graph of doom' referred to by the Accounts Commission as looming in Scotland. To build this, we did a lot of detailed work on their client-side forecasts using pupil growth data, dementia incidence forecasts, etc. (Note: SEN = ASN)

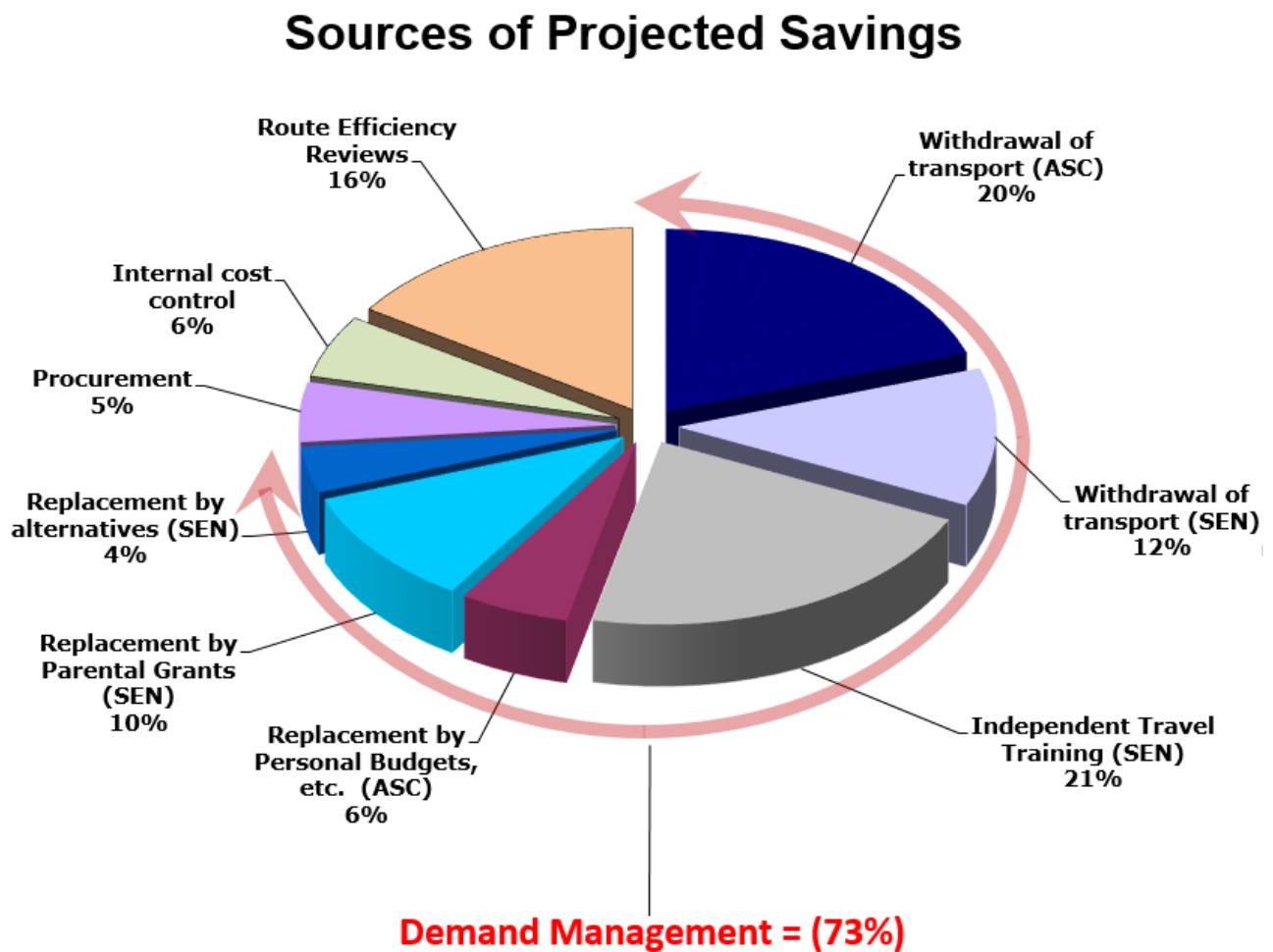
**Figure B: Mismatch between Financial Strategy and Cost Forecasts**





3.1.5 Consequently, we explored every possible avenue that we could think of from a transport unit's perspective (we also offered to work with the client departments to help them with any 'think the unthinkable' sessions that they might resort to – so that there could be more objective information about transport implications of wholesale day centre closures, etc., to help their decision-making). The analysis is shown below. Note that this authority no longer provides any funding for local bus services or community transport, other than reimbursing operators in line with the National Concessionary Travel Scheme obligations.

**Figure C: Client transport - savings potential in an English Unitary**



3.1.6 Looking at some of the components:

*Withdrawal of Transport (Special Educational Needs)*

3.1.7 Three years ago we worked (interim management / network redesign) in a London Borough supporting a transport transformation project covering SEN and Adult Care transport. Recognising that eligibility for school transport had not been managed particularly robustly in the past, the authority decided to adopt a completely clean-sheet approach. Consequently, they wrote to every

parent involved withdrawing transport provision and inviting them to reapply. This was undertaken alongside a clarification of the Council's SEN transport policy to make clear that the Council would be taking a more robust approach (although it wasn't a formal policy change, so didn't need to go through the in-depth consultation that would have been required in that case). A number of things happened:

- A small number of parents decided not to apply for transport.
- A larger number (ca. 30) had their applications turned down.
- Most (but not all) of the latter appealed, but only about 10% of the appeals were upheld.

3.1.8 These results reflected a significant amount of work that had been undertaken with members prior to the changes, which meant that they understood what was happening and were already prepared for some level of political pain. We have some issues with the consultation and appeals process but as yet, these have not been challenged, and the outcome is a major contribution towards the savings that were required. Care is required (cf. several Ombudsman cases) on how and what information is provided to parents.

#### *Independent Travel Training*

3.1.9 Local authority approaches to this have generally been ad hoc and haphazard, with no clear grasping of responsibility – is this organised / commissioned by the Transport Team, the ASN team, individual schools, a lead school, the colleges? How is the transition organised between school and Social Work support? There is a clear business case for developing ITT, as well as this being in the best interest of the individual service users because it enhances their independence. However, it requires a business model that can cope with extreme variations in the staffing requirements, and a lack of predictability – will this student require 5 or 25 buddying sessions? We have worked on ITT in a number of locations and have an associate agreement with Marie Rooney who has led on this for ATCO – she developed the award-winning centre at Beacon Hill School in North Tyneside: <http://www.beaconhill.n-tyneside.sch.uk/BeaconHillSchool/outreach-and-training/independent-travel-training/>.

#### *Personal Budgets / Parental Grants*

3.1.10 As these were introduced early in England, we have now been grappling with the issues thrown up for some time. On the Social Work side, calculating realistic costs and matching contributions is the major challenge, but there is also a requirement to gain a fairly detailed understanding of the welfare benefits system, as it has been failure to get this right that has led to a plethora of court cases (most not about transport, but the principles still apply). We have a partnering relationship with the author of the relevant section of the Disability Rights Handbook which has been of great assistance in

clarifying the thinking on this and related issues (e.g. can the Council withdraw transport support from people in receipt of Higher Rate Mobility Component to DLA/PIP?). As regards parental grants, we advise not simply expressing these in mileage terms, as what you are really paying for is the parent's time.

## **3.2 Tasks**

3.2.1 Our baseline reviews tackle the segments identified in Figure A in turn and consider whether the systems, processes and services in place are optimised against current best practice. The order of the segments matches the process that would be experienced by a pupil / family entering the system for the first time.

### **Policies**

3.2.2 We examine the policy or policies and set these against:

- a) What is required by legislation and Scottish government guidance
- b) Practice that we have observed in other authorities.

3.2.3 We are particularly interested in identifying any policy commitments that lead to 'discretionary' provision or any lack of clarity in the policy content that gives rise to grey areas.

3.2.4 We will ensure that we identify issues connected to Gaelic Medium provision and the implications of the development of catchment areas that we understand is underway.

3.2.5 We also examine the way in which they are communicated with parents, carers and other stakeholders, with a particular focus on how expectations are managed.

### **Eligibility Assessment**

3.2.6 We start by examining how the provision of transport is triggered. Does this require parental application in every case? Is it through a web application? What information is requested? Careful design of the process at this point should minimise the administrative requirements for multiple iterations with the applicants.

3.2.7 We produce a process map which helps ensure that our understanding of the processes involved matches that held by the council's staff. This also provides a check that the process actually matches what is in the stated policy.

3.2.8 We look at the skills of the staff who are making the assessment decisions around eligibility for (and the form of) travel support or assistance and the support arrangements for the frontline staff. Given the potentially emotive

nature of decisions and the extent of personal pressure that can be exerted upon staff who are exercising discretion, it is really important that there is clear management support for them. The pressure not only comes from parents and carers; it will come from schools and colleges and from colleagues dealing with the educational provision arrangements. To make robust and consistent decisions requires that frontline staff have all the relevant information about the applicant at their fingertips as well as reference material. There should be a triage process such that where there are any doubts, reference up can be made to a manager. We also examine what information about travel support, if any, is inserted into formal records such as CSPs.

- 3.2.9 In addition to looking at the initial eligibility process (are they entitled to travel assistance?), we also examine how decisions about the form of the travel assistance are determined. Some of these decisions will depend upon the availability of travel support options, such as ITT. One of the more critical, in cost terms, is a requirement for 'solo' transport.
- 3.2.10 There needs to be very good interaction between the team undertaking the eligibility assessment and the team commissioning the actual support so as to maximise the options available to planning the support. After initial decisions, how frequently are the travel arrangements reviewed? In principle, this should be undertaken at least annually but in many authorities this does not happen. Any offer to parents/carers must make clear that it will be reviewed and may be changed or withdrawn.
- 3.2.11 Reviews of the form of travel support should involve the schools. They are in the best place to assess whether X's behaviour is now such that he/she can travel with others rather than solo / Y is now ready to move onto a travel training course. We examine the extent of schools' active participation in this process.
- 3.2.12 We do some benchmarking of the levels of eligibility for travel support and on spend. However, this is heavily caveated because unless we can use information that we have directly from other work (on an anonymous basis) it relies on local authority returns and these are clearly not always completed in a like for like manner. We will seek approval to use, anonymously, recent work with neighbouring authorities to Highland.
- 3.2.13 We also consider the Appeal processes. Inadequate management of appeals is a major source of criticism of local authorities by the Local Government Ombudsman in England, although there appear to be far fewer equivalent referrals to the Scottish Public Service Ombudsman. The lesson from England is that the Ombudsman will support those authorities that make tough decisions, provided they do so in a way that is consistent and that meets the guidance. Losing appeal decisions has an inevitable impact on the robustness of decision-making of frontline staff and this will add to the cost of provision.

## **Travel Options**

3.2.14 We examine what travel support options are available to staff to consider as appropriate and how these are actually being used in practice. We are conscious that options other than direct transport provision do require parental agreement, so they must be attractively packaged and supported.

3.2.15 The three main options considered (in order of minimal dependency and longer-term cost-effectiveness) are:

- Independent travel training
- Travel budgets / direct payments
- Provision of transport

Again, where benchmarking data is available, the position in Highland can be compared with authorities elsewhere.

3.2.16 These are, of course, not the only options. We stress that the Council can make any suitable arrangement with the agreement of the parent involved. This could, for example, include providing the pupil with an electric scooter / wheelchair to avoid the need for council-provided transport. It can include provision of a bicycle (potentially an electric bicycle) along with safety training and equipment. It can include agreeing with the parent to provide transport for a sibling to another school where this would enable them to transport their child with ASN directly.

## **Planning**

3.2.17 We look at the travel planning process and in particular at occupancy rates to assess how efficiently the routes have been organised. Again, we stress that this is not an exact science. There is an interaction between route planning and:

- Local traffic speeds and congestion
- The availability of different types of vehicle within the local market
- The cost of different vehicle types within the local market (we have often experienced small minibuses being cheaper than taxis)
- The way that costs are built up through the procurement model (e.g. call-offs on mileage or time/mileage or specific quotes)

in order to obtain the most cost-effective network for the authority.

3.2.18 Where an authority is using scheduling software, we will interrogate the system to understand and challenge the constraints that are being applied. Depending upon the confidence levels this gives, we may offer to undertake a sample reschedule at a particular school. Ideally this is undertaken in

conjunction with the school so that we can get them to comment on the feasibility / appropriateness of particular groups of pupils travelling together. We use open source scheduling software that we have adapted specifically to undertake SEN home to school network planning and to avoid being associated with any single one of the software packages that are on the market. This enables us to provide completely neutral advice on software and ICT to authorities – we have an associate who specialises in business process analysis, system specification, procurement and implementation support where required – see 3.2.49 below.

3.2.19 We are aware that THC does not currently deploy such software and indeed is in the process of commissioning such a system. We have not, therefore, included a sample reschedule in this proposal.

3.2.20 A critical issue for effective planning is the timeliness, quality and detail of data that comes through to transport teams from the eligibility / needs assessment process. If this is inadequate it will lead to sub-optimal decisions and may require the transport planning team to undertake or to commission separate assessments - for example to identify whether a pupil marked as being a wheelchair user can actually transfer into a seat for the journey – or even, where the transport requests arrive late, to have to buy in additional short notice transport.

3.2.21 We undertake an analysis of the contract costs and the costs per student, relating this to:

- Reasons for eligibility and the specified needs;
- Areas served;
- Vehicle types;
- Provision of passenger assistants;
- Interaction with public or other transport, including 'privilege' places.

3.2.22 As elsewhere, if it is possible to benchmark the results then we will do so. It may be useful to consider a request for information from selected other authorities via ATCO Scotland.

### **Procurement**

3.2.23 We examine the procurement processes involved. We have experience of a full range of models and have undertaken procurement exercises for authorities using open procurement, frameworks and, most recently, DPS. We have experience of e-auctions and fixed price call-off systems.

3.2.24 A significant issue for us is market engagement – this is often an area that authorities do not give enough attention to, resulting in lower levels of

competition and in some cases gaps in the local provision of services at the quality level to which the authority aspires.

- 3.2.25 We undertake market analysis to identify how effectively the authority is attracting local operator participation and optimise competition. Where appropriate, we can undertake formal or informal surveys of operators (preferably working with the Travel Unit) to discover their views about working for the council, any barriers to their participation, the potential for investment and the business models that they have adopted.
- 3.2.26 We will also examine the procurement documentation, especially the Conditions of Contract and the level of detail in the Service Specifications and provide THC with marked up copies containing our comments (similar to our approach to policies).
- 3.2.27 We will, as requested, give specific consideration to contract duration and also the retendering programme, giving consideration to:
- Impact of Covid on operator revenues and the implication for prices given short-term market conditions
  - Peak staff workload
  - The potential benefits to a staggered procurement programme.
- 3.2.28 Where data is available, we will offer benchmarking comparisons with rates that are achieved by other authorities. This information needs to be caveated because of local market conditions and different procurement approaches but can be useful in highlighting particular anomalies in terms of rate per day.
- 3.2.29 This is also helpful in considering the performance of THC's small in-house passenger fleet operation and whether that should be expanded in the future. It is important to understand that in-house operations are not simply justified on a lowest cost basis. They may:
- Set the quality and safety standards for the operation
  - Act to deter cartelisation
  - Be a provider of the last resort where market gaps occur
  - Focus on provision for pupils with the greatest or most complex care needs where the authority owes a significant duty of care which it may not wish to outsource responsibility for.
- 3.2.30 We will provide a cost analysis for the in-house operation. However, significant parts of in-house costs are generated by:
- Allocated cost of in-house fleet management, maintenance and garaging
  - Corporate overheads

- Capital / leasing treatment.

3.2.31 Consequently, some maturity is required to interpret the resulting costs and to make properly informed “make or buy” (or indeed an appropriate mix) strategic decisions. This needs to take a long-term view - we are conscious of examples where authorities have pursued short-term savings to the detriment of quality, reliability and, ultimately, costs.

3.2.32 We can consider all alternative approaches including:

- Route by route outsourcing
- OSOO (One School One Operator)
- Block outsource (like Bromley/GSPlus; Waltham Forest/HCT) with public authority / social enterprise / commercial provider [we participated in the recent competitive dialogue procurement in Southend]
- Establishing an LA trading company [we set up TSS (Transport Service Solutions) for Cheshire East]
- Mixed model – internal management and operation with 100% outsourced resources (Barnet)

3.2.33 There are always issues of scope e.g. who does the planning? links to other fleet functions? Premises opportunities? and there are different contracting models to consider, as well as TUPE. This is seldom straightforward. The main fleet cost driver is frontline staff so the effectiveness of their deployment is a primary consideration - this includes drivers and passenger assistants.

3.2.34 Issues for the latter include when these are required, the quality/training and who employs and manages them. There are no easy answers to these questions – every authority we have worked with recently has raised this as an issue. This is a perennial problem for authorities, made worse recently by the introduction of Universal Credit. There is an underlying trend towards passing responsibility to external operators, but this needs controlled training and guidance on recruitment (see LB Camden court case). For in-house, our experience of agency provision in London raised quality issues and breach of minimum wage laws. Linking the work to either teaching or care assistant functions can make it more attractive. Domiciliary care workers already working under a direct / indirect contract with the Council are a better source of PAs than generic agency staff. Incentivising parents is very cost-effective. In some cases, there will be a need for ‘medical’ PAs available (at a cost) through specialist providers. Where directly employed, better support and communication arrangements can improve perceived status which results in better retention.

3.2.35 We will comment on the current arrangements and provide best practice guidance with reference to our experience with other authorities.



- 3.2.36 In general, consideration of your existing arrangements needs to take a long-term view. The analysis needs to be robust and reference external data sources for comparison so that trust is created in proposed options and associated savings.
- 3.2.37 The commissioning of taxis and private hire cars/MPVs (and other vehicle sizes and types) raises a wide set of questions about the procurement models and detailed options, but also about long-term market development and whether there are constructive opportunities for more strategic relationships with the supply sector that would allow them to invest in staff recruitment, training and better quality vehicles and technical equipment. The use of real-time communications that provide timing information directly to service users, their parents and carers is an example of what can be achieved through partnership. But of course, in the THC situation this will need to cover the processes surrounding the assignment of individuals to taxi transport, as well as the specific documentation, conditions of contract, contract periods, incentivisation arrangements etc. associated with the procurement model.
- 3.2.38 We are fully up to date with all the regulatory issues surrounding the use of community transport operators to provide home to school transport, including:
- Compliance with one of the exemptions in Reg. (EU) 1071/2009;
  - Meeting the requirements set out in ss18-22 Transport Act 1985, including the use of small vehicles;
  - The requirements of s1(4) Public Passenger Vehicles Act 1981 for small vehicles;
  - EU State Aid controls and the developing Subsidy Control regime under the Withdrawal Agreement and WTO rules;
  - Scottish Charity regulation and guidance;
  - Corporation Tax and VAT position for community transport organisations;
  - Constitutional models and their implications;
  - The application of MEAT and Social Value within public sector procurement.
- 3.2.39 We will therefore be able to comment constrictively on the potential role that different types of community transport operation could play within the provision of home to school transport – particularly through holistically packaged arrangements including additional public passenger transport services.

## **Operation**

- 3.2.40 We offer to undertake on-site observation of the transport in action at a sample set of sites, preferably those where the most vulnerable pupils /

students are travelling to. We also look at a sample of vehicles involved to check the passenger environment and the safety equipment involved. We do this with our partner Puwertec, specialist safety engineers, using a system we have jointly devised. Some sample output pages are shown in an Appendix which should also illustrate why we believe this is extremely important.

- 3.2.41 We also examine recorded contractual performance and any accident / incident records, including safeguarding issues. In some authorities, there are issues concerning operators handing back contracts – action needs to be taken to prevent them from gaming the system.
- 3.2.42 We also examine the results of any customer / user satisfaction surveys that have been undertaken and comment on the process around customer assurance.

### **Monitoring**

- 3.2.43 We examine the monitoring and reporting arrangements in place. What data is collected? How is it presented? Who gets to see it? What decision-making does it support? This is often an area which explains mutual misunderstanding between transport teams and either their client departments or senior management.

### **Reporting and Review**

- 3.2.44 We are particularly interested in the requirements placed on a passenger transport unit under an internal Service Level Agreement. Whilst ensuring this is not over bureaucratic, it can be very helpful in setting down the performance standards (e.g. turn round times) – potentially KPIs, the items which will be reported on, the format and frequency of these reports. SLAs will also set out the target notice arrangements i.e. when will data about eligible pupils and placements be made available to the transport team.
- 3.2.45 Financial reports need to be in a format that both the client-side and the transport side find useful. Reports produced by local authority accountants are not always easy to follow, amongst other things because of the way accruals and prepayments are handled. There needs to be a culture of ‘no surprises’ so that trends are reported on and understood at an early stage.
- 3.2.46 We note that in many local authorities the PTU maintains its own accounts for the purposes of budget management and helping the client department with its budget forecasting. There needs to be some joint understanding of how to align these with the official accounting system – Integra.

### **Budget Creation**

- 3.2.47 At the last point in the travel cycle we briefly examine how the reported information about transport activity, trends and costs is then combined with predictions about:

- demand growth (more pupils / more with ASN / more complex needs)
- education provision trends – new schools, specialisation, requirement for out-of-council area placements
- implementation of cost-saving measures

to act as the basis for budget setting. Too often, home to school transport budgets are set on the basis of last year's figure plus or minus an adjustment percentage, with little or no basis in objective information. This may also result in less focus on transport 'overspend' when the reality is an 'under-budget' that fails to reflect the underlying growth in service demand that is outside the transport team's control. Whilst considered in the context of the corporate position this may not seem very important, how these issues are expressed can affect staff morale and relations because it makes 'failure' almost inevitable.

### **Governance and structures**

3.2.48 Taking all the above into account, we look at governance and structures, looking at:

- the location of particular functions (for example, because of the importance of travel eligibility and detailed needs assessment as a cost driver, we regularly observe this function swapping backwards and forwards in local authorities between the client side (Children's Services) and the Transport Planning side (Environment); alternative approaches involve placing staff from Children's Services into the Transport Planning Team)
- the reporting structure and how strategic or tactical changes are approved and implemented
- the budget control structure - is budget management located with people making decisions that most directly affect costs?
- management and administration staff numbers and grades
- training and skills development and the processes that ensure that relevant staff keep up to date with national best practice
- Service Level Agreements or equivalent arrangements that underpin performance management reporting
- Engagement with customers and clients - where does this occur, how frequently, in what formats? We note that this includes pupils and students., parents and carers, institutions served (notably schools and colleges), intermediate agencies (parent support groups, etc.).

## **Information and Communications Technology**

- 3.2.49 We understand that the process has started to acquire an IT system for contract management and route planning, but that advice is required in respect of the suitability of the draft specification that has been developed and any other features that should be included.
- 3.2.50 We have extensive experience of developing specifications for H2S transport and other passenger transport services as well as knowledge of proprietary software programmes deployed for this market. There are a range of software packages that provide off-the-shelf functionality to manage home-to-school transport for mainstream and ASN students. Their features and functionality reflect experience gained from deployment in PTU's and education authorities. Generally they aim to improve efficiencies in data management of pupils and transport services through a technology led approach by which the customer (PTU) is expected to amend their business processes and data management to fit-in with the software procedures.
- 3.2.51 Our experience is that PTU's business processes rarely neatly match the software procedures which can lead to implementation problems and lower than expected benefits unless these issues are addressed up-front. Hence the need for a robust user requirements specification that can be mapped against suppliers packages. Our approach employs the following steps:
- a) Document current business activities and systems used to manage these (e.g. business process diagrams);
  - b) Determine information requirements and data management for internal and external users (data flow diagrams);
  - c) Confirm the business processes for the H2S service included internal procedures and interfaces with external systems and agencies. Identify gaps and weaknesses;
  - d) Review the robustness of the current process and the benefits that the PTU and external agencies could gain from deploying a proprietary system (and what they may need to change to benefit from a more automated/streamlined process);
  - e) Evaluate the draft requirements specification against the above including compatibility with IT standards and protocols;
  - f) Make any recommendations as appropriate to modify the requirements specification.

### 3.3 Meeting the Brief

3.3.1 We believe that the above meets all the components in the revised brief:

<b>Topic</b>	<b>Location</b>
Policy alignment	3.2.2
Assessment of costs and value	3.2.21
Conditions of contract	3.2.26
State of bus and taxi markets	3.2.25, 3.2.37
Costing of in-house operations	3.2.30
Potential for expanding in-house	3.2.29, 3.2.31
Potential for expanding CT	3.2.38
Potential for alternative delivery methods	3.2.14
ASN eligibility process	3.2.6
Management of escorts	3.2.35
Advice on IT system specification	3.2.49
Contract duration and retendering	3.2.27

### 3.4 Outputs

3.4.1 As we work through the topics we will produce 'Task Notes' in draft and share these with THC officers to check for accuracy and completeness. We envisage pulling these together in a Draft Review Report which, for each of the topic areas:

- a) Sets out the baseline position including any analysis;
- b) Identifies potential options for THC to consider.

3.4.2 We will discuss the options with THC staff and for those options selected for further consideration we will produce a more detailed explanation of how they could be delivered looking at any legal issues, resources, costs and timings. This will be circulated in the form of a Draft Options Report.

3.4.3 When approved, we will produce a Final School Transport Review Report.

3.4.4 We are happy to make a Presentation to senior officers and elected members as required.



## 4.1 Project Management and Staffing

- 4.1.1 All TAS projects are run by a Director, and **John Taylor** would be the Director in charge of this project. John has been the Director in charge of many TAS projects over the past 25 years, including all our best value and coordination work for local authorities, and he has substantial specialist experience of home to school, adult social care, bus subsidy and community transport reviews to draw on.
- 4.1.2 Principal Consultant **John Atkins** would have the day to day management responsibility for this project to ensure progress. John has expertise in accessible transport, safety and quality standards, taxi and private hire car management, in-house operation and community transport, and has worked on similar local authority transport reviews to this one.
- 4.1.3 John will be assisted by Principal Consultant **Chris Stockton**. Chris has direct experience in planning and commissioning (in-house and externally) both mainstream and SEN transport within local authorities, and is just completing a placement with a unitary authority where he is acting as interim special needs transport eligibility and service planning officer.
- 4.1.4 The project will be managed from our offices in Preston (see Covid-19 section), where there are all the necessary support facilities, offering a comprehensive range of analytical, statistical, operational, presentational, legal, management and administrative skills.
- 4.1.5 TAS is registered with the Information Commissioner to handle all the forms of data that may be necessary for such a review. We have a comprehensive data protection policy and adopt double encryption for sensitive data exchange with passwords passed over verbally in a separate communication.
- 4.1.6 Staff profiles for the key members of the proposed project team are appended to this proposal.

## 4.2 Project Management

- 4.2.1 Our normal method of working is to maintain a three level approach to formal reporting, including:
- a) Weekly e-mail contact with your nominated client officer to appraise of progress, problems, data issues, time slippage, etc., and our approach to their resolution.
  - b) Periodic project progress meetings to a schedule agreed at Inception, but at least fortnightly. The project documentation is updated for these meetings and circulated.

c) The production of a series of Task Notes, each reporting on the outcome of a particular topic, which together build over the period of the review into a comprehensive Report. The production of the Task Notes would mark the attainment of milestones. These Task Notes would create the baseline position for the Options Report. We consider the Task Notes to be working documents until formally presented and agreed by the Client.

4.2.2 The Inception Meeting is critical to these sort of transport reviews. We will prepare a draft agenda and circulate a data request before the meeting which we can then consider at Inception. This will identify whether the data can easily be produced, who will produce it and the timescale involved. Inadequate data is the key reason for project delays.

4.2.3 The Inception Meeting will also:

- identify key contacts for interview, communications and data gathering.
- confirm any consultation requirements;
- agree approaches to benchmarking.

### **4.3 Covid-19**

4.3.1 Our assumption is that this work will be undertaken remotely, including regular project progress meetings and interviews with key contacts. TAS has been working on a remote basis since March 2020 to ensure the safety of staff. We utilise standard technical measures such as Teams, Zoom and Skype for meetings as well as file-sharing systems including Teams and Dropbox. For some projects the authority involved deploys Egress security software to manage email communications and file exchange.

### **4.4 Use of Internal Council Resources**

4.4.1 There will be a requirement for THC staff to participate actively in this review. Obviously, time needs to be made available for one-to-one interviews as well as project meetings. In particular, as outlined above, the timely provision to us of relevant documents and data is critical to making progress and sticking to the proposed timetable, and this will inevitably involve time from THC staff.

4.4.2 We would like to emphasise that we completely understand that officers need to continue to deliver on the day job and that, given the size of your team, there is no obvious spare capacity. Our approach is to produce a 'data request' – i.e. an ideal listing of information to start with – and to undertake a triage, which enables the relevant officers to identify whether:

- Data are easily available in the form required;
- Data could be made available in the form required with up to 2 hours effort;



- Data are available but in a different form;
- Data could not be made available without more than 2 hours work.

4.4.3 We then assess the implications of the above and jointly agree with you what data to capture. It should be stressed that TAS is experienced in local authority transport data gathering and manipulation. We do not anticipate sitting back and waiting, but will participate directly in order that the objective of obtaining enough data to enable analysis is achieved. One issue with this type of work is incomplete, missing or dispersed datasets. We have considerable experience in working with internal IT and finance departments, suppliers and fleet administrators to ensure as much data as possible is extracted in electronic form, but we can also call upon data input staff to enter data from paper sources.

4.4.4 We do suggest, however, following poor experience in a minority of authorities where the implementation of improvements has been thwarted by the refusal of departments to either provide useful data or to carry through actions agreed at the project steering group, that there is a need at the Inception meeting to establish an escalation process to ensure that the Council's senior officers can be requested to intervene where necessary.

## 4.5 Timescale

4.5.1 We anticipate that this project will take ca. 12 weeks from Inception:

- Data gathering 2 weeks
- Processing 2 weeks
- Follow up and interviews 2 weeks
- Draft Report 2 weeks
- Options Development 2 weeks
- Final Report / Presentation 2 weeks

4.5.2 This commitment is subject to the supply of data and information that we may require to inform the project within 5 working days of our request.

4.5.3 Throughout the project we would maintain regular contact with your nominated officer to advise of progress and any potential delays. We would provide updates by e-mail at least every two weeks.

## 4.6 Fee Proposal

- 4.6.1 Our staff cost for this project is summarised in Table 4 below, with the anticipated time allocation and daily rate relevant to each member of the study team. A working day is no less than 7.5 hours.

**Table 4: Staff Cost [Figures redacted]**

Consultant Grade	Days	Daily Rate	Staff Cost
Director			
Associate Director			
Principal Consultant			
Senior Consultant			
Associate Technical Expert			

- 4.6.2 Given the COVID-19 position, we are not assuming that there will be any expenses relating to travelling, subsistence, software licences and other administrative costs. If an on-site presentation is possible within safety guidance and required, then any related expenses would be passed on at cost. Only standard-class rail fares are purchased, with any discounts passed on to the client in full. Travel by car is undertaken only where deemed essential, and is reimbursed at only 26 pence per mile. Subsistence and accommodation expenses are charged at cost.
- 4.6.3 Our fee quotation for the core part of this work, on a fixed price basis, is therefore, £24,832.50, excluding VAT, which will be charged at the prevailing rate. This quotation is valid for three months from the date of issue of this proposal.
- 4.6.4 With your agreement we will present invoices each month to cover the work done in the previous month within the total of this fixed price.

## 4.7 Safety Inspection Option

- 4.7.1 The cost of this will depend upon the number and location of schools visited. Our associate, Paul Csaszar from Puwertec, undertakes this work for us using a jointly developed reporting framework. He would normally expect to visit one school at the morning arrival time and another at the afternoon departure time and use the intervening time to write up the safety and quality assessment notes for us. We then quality assure these and provide a short commentary setting out the implications for the council and the suggested actions that are required to mitigate. Allowing for visits to 4 schools and an allowance for travel time to arrive on site, we estimate that the safety inspections and report would cost £[REDACTED]. This includes travel expenses but is exclusive of VAT.

- 4.7.2 The option would be available for a THC staff member to accompany Paul and for there to be some knowledge transfer time available in between visits. Paul is also accredited to deliver wheelchair passports under BS8603.  
<http://www.puwertec.com/index.html>

## **4.8 Study Administration**

- 4.8.1 Our appointment would be governed by and construed in all respects solely in accordance with Scottish law.

## **4.9 Liability and Professional Indemnity Insurance**

- 4.9.1 We have standing Public Liability Insurance of £5 million, Employer's Liability Insurance of £10 million and Professional Indemnity insurance of £5 million. We can provide copies of current certificates on request.



# **Appendix A: Optional Safety Checks – Sample Reports**



Facility / Location	[REDACTED]
Site Contact Person	[REDACTED]
Service User Groups	[REDACTED]
Date	27 <sup>th</sup> March 2019

**Observations on vehicles and transport staff**

First vehicle Arrival time on site	08.40
Start time of Boarding/Alighting	08.45
Number of passengers ?	
Departure time from site	

**Pictures to Gather.**

Entrance/exit to centre/location	Boarding/alighting area
Passenger access to centre/location	Access/egress to Vehicle
Types of vehicles External view	Types of vehicles Internal view

**Site Details**

Brief site description / Photos

	
<b>Left hand main road entry point to gate</b>	<b>Right hand main road entry point to gate</b>

Is general area safety signage in place where necessary ?

		
<b>Access to the school from main road</b>	<b>Staff car park and parent/taxi drop off point</b>	<b>Drop off parking area</b>

Main road(s) type / speeds ? **Main road although zoned to 20mph**

Are speed limit signs in place ? **Only to the road**

Is a site traffic route in operation ? **Yes although not signed but managed by a member of staff that is positioned at the gate**

Is this adequately signed ?


--



Did site staff assist whilst parking/manoeuvring took place ? If so, how? <b>No</b>
Did site staff assist Service Users to board / alight from the vehicle ? <b>No</b>
Did there appear to be a point of 'formal' hand over of responsibility between transport staff and site staff ? <b>Yes</b>
Were the drop off / pick-up points kept clear of other pedestrians ? <b>Yes</b>
Were the drop off / pick-up points free from other traffic ? <b>Yes</b>
Do the traffic arrangements create congestion or delay ? <b>No</b>

**Staff / Vehicle / Accommodation**

Did driver / passenger assistant wear uniforms ? <b>No</b>
Did driver / passenger assistant wear photo ID badges ? <b>Yes</b>
Was high visibility clothing worn by driver / passenger assistant ? <b>No</b>
Was the engine left running whilst boarding/alighting took place? <b>No</b>
Was anyone seen smoking inside the vehicle ? <b>No</b>
Was anyone seen standing while the vehicle was moving ? <b>No</b>
Were all seat belts / restraints correctly worn until the vehicle stopped ? <b>Yes</b>
Were all wheelchair passenger restraints correctly worn ? <b>No</b>



No shoulder belt applied to Passenger restraint.

No shoulder belt applied to Passenger restraint.

No shoulder belt applied to Passenger restraint.



No lap belt applied to Passenger restraint.

No lap belt applied to Passenger restraint.

Seatbelt receiver not positioned behind the wheelchair, risk of the buckle releasing in an accident, Buckle Crush.



No shoulder belt applied to Passenger restraint.

No shoulder belt applied to Passenger restraint.

No Passenger restraint applied.



## SUMMARY REPORT AND RECOMMENDATIONS FROM THE TAS PARTNERSHIP

### 1. Introduction

- 1.1 This Chapter is structured using the TAS Review Cycle approach developed from a concept created by the Audit Commission to structure thinking about local authority best value reviews. The various components are set out in their logical order in Figure A below:

**Figure A: School Travel Review Cycle**



- 1.2 Each element of the cycle contains the potential for improvement and therefore these have been reviewed in turn against national best practice and the latest developments and approaches in other authorities. It will be seen that the first part of the cycle is concerned with demand management.

## 2. Conclusions

### Policies

- 2.1 THC's School Transport policies meet the Council's statutory duties and government guidance and are not more generous than those of other Scottish authorities.
- 2.2 Where discretion to provide transport exists, the policies set out how discretion is limited and the processes to do this are generally effective and in line with best practice.
- 2.3 The approach adopted by THC towards transport to Gaelic Medium Education is logical and consistent with guidance; this is not an area that THC could consider discretionary.
- 2.4 Provision of transport support to a school chosen by a parent on denominational grounds is discretionary. Another area where THC differs from some other authorities is that transport can be provided to more than one home address where parents are living apart. Our understanding is that these two matters have been explicitly considered by THC in the past and the current policy endorsed.
- 2.5 Despite the statement in the Policy that "*Transport is not provided to nurseries or pre-school education*" THC does in fact provide some ASN nursery transport. We assume this is under 'exceptional circumstances' discretion but the criteria under which this is provided are not published which is a failing that could lead to a maladministration complaint.
- 2.6 As a matter of formality, we note that THC has not produced an Annual Seat Belt Statement as required.
- 2.7 There is no environmental component to the School Transport policy. This implicitly influences THC staff to focus on cost-saving at the expense of environmental impact.

### Eligibility

- 2.8 The bulk of transport eligibility determinations requires a) identifying available (i.e., safe) walking routes, and b) measuring the distances involved. THC has good practice processes in place for both these functions.
- 2.9 Transport is only now provided where there is a specific application by the parent. However, to reduce administration costs there is no requirement for reapplication unless circumstances have changed. This can potentially lead to over provision of capacity where an entitled pupil uses another mode to travel to school. The absence of electronic records that show whether pupils actually used some transport options (e.g., school buses) compounds this problem.

- 2.10 Whilst the application process has mainly moved on-line it still includes a manual option (which requires different information). Schools are involved in the process which can give rise to delays before information is passed on. A full-scale move to electronic applications and communications with parents would streamline the process.
- 2.11 The Transport Unit manages school transport on the basis of three geographical areas which, whilst good for local liaison and knowledge, can give rise to inconsistency. The introduction of centralised transport management software aligned to streamlined business processes should eliminate this problem.
- 2.12 Discretionary eligibility decisions, particularly for ASN transport, are shared between the Transport Unit and Education. There are no means for officers to assess how robust these decisions are, which raises some perceptions that the Council is over-generous.
- 2.13 There is no consistent approach to reviewing, ideally annually, discretionary eligibility decisions – for example to assess whether a pupil provided with dedicated transport on ASN grounds has now acquired the necessary functional skills that would mean that they were suitable for Independent Travel Training.

#### Travel Options

- 2.14 THC faces significant challenges due to its geography. This applies both to the demand for transport (very lengthy journeys which cannot be combined due to the resulting excessive travel time) and the supply of transport (areas where there is a shortage of providers). The Transport Unit does make effective use of both in-house provision of vehicles and drivers and of community transport services where the commercial offer is either unavailable or unacceptable from a cost viewpoint. It also seeks to optimise the use of public transport i.e., primarily registered local bus services wherever possible.
- 2.15 However, the legislation setting out school transport duties on authorities makes it clear that they can make “*such arrangements as they consider necessary for the provision of*”:-
- Transport
  - Bicycles or other suitable means of transport, to the pupils or to the parents
  - Payment of reasonable travel expenses.
- 2.16 Specifically, THC does not provide for either:-
- Independent Travel Training – equipping pupils with ASN with the skills required to travel independently
  - Cycling

This is poor practice from the point of view of pupil health and wellbeing, and the environment. In addition, it contains the potential to save the authority's costs over time.

- 2.17 In addition, our assessment is that the current THC travel expenses scheme is not flexible enough to attract parents, particular those with ASN pupils who may be travelling short distances, to provide the transport themselves. Note that whilst potentially offering significant savings to the authority, this may increase vehicle movements to particular schools and therefore produce a worse environmental outcome. But as there is no current requirement to consider the environment and more specifically no guidance on how to value environmental impacts when considering the options and costs, that concern had not been the reason for not pursuing this option.
- 2.18 THC already provides for ferry travel where logistics requires it, but it does not take advantage of the discretion within the legislation to provide other, less conventional, forms of transport or approaches, such as providing a powered wheelchair as an option for a disabled child within walking distance.

### Planning

- 2.19 The Transport Unit currently uses an Excel spreadsheet system, linked to external web-based mapping and corporate GIS, as its primary means of planning the school transport arrangements and maintain records. Whilst we should record that the system in place is the most sophisticated development of an Excel approach (which was the common model for most authorities) that we have ever encountered in work with over 50 other UK education authorities, the fact is that this approach is no longer fit for purpose.
- 2.20 This is primarily because although it helps decision-making and maintains basic records of transport arrangements, contractors, routes and costs:-
- The record-keeping arrangements are limited – particularly around recording decision-making (who, when, why, etc)
  - The reporting arrangements are even more limited and there is a risk that this results in the Transport Unit being unable to demonstrate its cost-effectiveness
  - Data exchange arrangements are limited with Education and schools and with external public transport information systems (e.g., where THC commissions a school bus that is open to the public)
  - The distributed nature of the management arrangements, with each of the three Transport Unit areas operating its own spreadsheet (Excel is not designed as a database for multiple concurrent use) gives rise to slight variations in approach e.g., different shortcut coding which then adds to the difficulty in providing consistent authority-wide information.

- The current arrangement makes it difficult to assess the likely costs of different options. In addition it contains no measures of the environmental impact of different options.

2.21 In addition, there is no automated route optimisation function. We stress that in our experience this is less important than record-keeping and reporting. The complexities of ASN transport provision, in particular, require human judgement. The current approach uses three staff with local knowledge of the road system in their patch, personal relationships with the school and the operators in their area, some knowledge of the pupils involved and experience of previous journey times to help come to effective logistical decisions. However, these arrangements:-

- Are vulnerable to staff change
- Do not allow staff to easily test a series of alternative routes or transport options to confirm the most cost-effective option
- Are time intensive.

We have not undertaken a sample schedule to assess the efficiency of the current route network as this was outside our brief. But equally we have not observed anything that suggests any such inefficiency.

2.22 There is an overlap between the two Transport Unit functions – provision of cost-effective school transport and commissioning an effective public transport network that meets local needs. It should be recognised that pupils and students not entitled to free school transport or travel should be considered members of the public and they may have a need for public transport to access education. Whilst THC does currently have a ‘privilege lift’ system in place to make spare capacity available to such students, the question arises whether this should be a deliberate policy. A recent instance of reducing such capacity led to parental and member complaints. It would assist the planning process and staff involved if there were some corporate guidance as to the appropriate balance to be struck.

2.23 This issue is being brought into sharp focus by the Scottish government’s introduction of free bus travel for Under 22’s. This raises a number of complex issues and at this moment it is unclear whether Transport Scotland will reimburse authorities and operators that respond to the predicted increase in demand, particularly for journeys within the statutory 2- and 3-mile walking distances.

#### Procurement

2.24 Highland Council participates in a joint procurement strategy along with Aberdeenshire Council and Aberdeen City Council. THC has operated for a Dynamic Purchasing System (DPS) model since 2020 to replace a non-electronic framework. Using a DPS model constitutes good practice in a constrained market as it allows new operators immediate access to opportunities once they qualify through the validation and quality processes.

It is also flexible enough to allow for differentiation into separate lots reflecting e.g., different vehicle sizes or service types required, and different approaches to mini-competition and award can be pursued, including a greater or lesser emphasis on quality or price.

2.25 Suppliers must accept the THC Conditions of Contract. Whilst this is in essence fit for purpose as it stands, TAS has provided detailed commentary on this document and identified a number of improvements, including:-

- Updating to reflect post-Brexit legislation and guidance
- Handling of TUPE
- The approach to annual price adjustment
- Adjusting the defined Lots
- A very unspecific and unenforceable reference to environmental impact
- A requirement for operators to comply with the official guidance on maintaining vehicle roadworthiness
- Updating and enhancing references to child safety requirements
- Updated section on Protection of Vulnerable Groups requirements
- Additional sections dealing with safeguarding training and whistleblowing

2.26 Issues raised include:-

- Whether some of the more detailed quality aspects and monitoring arrangements (which are unusual for contracts of this kind) are needed or applied consistently e.g., a complex 'Rectification Plan' process
- The need for a consolidated and streamlined performance management process which aligns the documentation with what can actually be delivered in practice
- The need for a plain English version of some sections – notably data protection/confidentiality and transport risk assessments – which gives smaller operators clear instructions as to what they must or most not do
- Identification of subcontractors. There is currently a clause excluding sub-contracting without formal THC approval. This clause is not being enforced where private hire car operators bid on the basis that they are acting as agents for independent self-employed drivers signed up to their booking system, despite the fact that the Conditions explicitly require it in these circumstances. In some cases, THC can identify whether self-employed drivers are involved from the VAT status of invoices.

Where drivers are employees of the contractor then the turnover will be above the VAT threshold and a VAT invoice will be issued. Where the contractor is acting as an agent for self-employed drivers, their individual turnover will be under the VAT threshold so the invoice will not include VAT.

- THC is a 'living wage' employer since December 2019. The Conditions of Contract require contractors to offer 'Community Benefits' including "A commitment to fair working practices including the "Real" Living Wage". However, in practice there is no evidence that the Council actually enforces this requirement and some suggestion that a number of the 'self-employed' drivers currently providing school transport services are reimbursed below living wage.
- The status of self-employed drivers – recent court/tribunal cases, most notably connected with Uber and Addison Lee taxi/private hire services, have determined that self-employed drivers who are subject to a level of control by the company they work for, do in fact qualify as 'workers' (rather than employees) and are therefore entitled to minimum wage, holiday pay and certain other benefits. Employment law is not a devolved matter, so the rulings do apply in Scotland. If this works through, then it may well affect the contract prices paid by the Council.
- Whilst THC does not have a direct role in enforcing tax rules it has an indirect one and would be expected to assist HMRC in investigations. HMRC has recently announced some new requirements for declarations by taxi and private hire licence holders.
- Clarification and confirmation of valid insurance cover for the service where sub-contractors are involved.

2.27 THC faces a significant struggle to ensure that the market offers adequate competition. Its position is in extreme contrast to urban or suburban authorities which can expect significant cross-border competition and a much larger supply market supported by lower car ownership and more frequent use of bus, taxi and private hire services.

2.28 The relatively recent but very significant shortage of drivers in the PSV, taxi and private hire sector is bound to impact on the Council's ability to attract competition and in some cases any bids at all for school transport work. Many drivers have taken the opportunity created by COVID-19 to redeploy to the light van and HGV distribution markets which offer better pay and/or conditions. It seems likely that an increase in passenger transport driver pay rates will be the primary response to this shortage and, given that staff costs make up more than 60% of the costs of transport operation, this will certainly have an impact on school transport costs faced by local authorities.

2.29 Strategies that the Council can adopt to ensuring competition and controlling costs include:-

- Regular engagement with the supply market and the offer of practical support to potential tenderers (e.g., help in registering for the DPS). This engagement was suspended during COVID-19 – it should be restarted.
- Direct provision of some features that may be problematic for smaller operators to provide themselves. An example would be driver training; if the Council organises this directly it would also give it much more control over the content and delivery process, which we consider necessary (see Operations)
- Use of in-house provision, particular in respect of the more specialist requirements for accessible minibuses serving children with significant care needs. It is more difficult for external operators to offset their investment in such vehicles and staff by a range of other work in addition to their school transport contract. Consequently, THC will pay for most, if not all, the overheads costs for such operators. THC already uses in-house provision. However, in the long-term the enhanced conditions of employment associated with working for the Council does mean that although THC direct provision should definitely be considered as a tactical solution (which it currently is) within a portfolio of options and can be expanded as opportunities arise, it cannot be considered as a large-scale strategic solution to the cost problem. Reflecting this, the current trend across local authorities is to outsource passenger transport provision. There are also practical constraints for THC to scale up its fleet because of the dispersed nature of the requirement. We have observed a variety of partnering models in operation by THC (e.g., with schools) and pragmatic use of caretakers as drivers, and we consider this good practice and evidence of a flexible approach.
- Use of community transport (CT) operators to provide home to school transport. Again, the Transport Unit is well aware of this pathway and the approaches taken have been more innovative and integrated than at any other authority we have observed. This is not, however a universal or easily scalable solution given the community-based nature of these groups and the requirement of volunteers for much of the driving (even if the school transport is provided by paid drivers) as well as to take on the trustee roles. There will be further opportunities to extend the use of package commissioning (i.e., a joint commission of school transport and community transport) but these solutions do take up above average officer time. We have provided a detailed commentary and guidance around the issue of CTs undertaking school transport, covering constitutional, tax, charitable status, competition law, subsidy control and operator/driver licensing.
- Greater use of unlicensed drivers operating under the '24-hour exemption' from private hire licensing where the individual works exclusively for the Council. THC already makes use of this exemption.



- More provision by parents – particularly under revised reimbursement arrangements. THC could also facilitate parents to share transport arrangements for entitled children between themselves to make the offer more attractive, reduce the individual burden and the environmental impact. This would require a specific initiative.
- Operation-only contracts where the Council supplies the vehicle – particularly where there is a shortage of good quality accessible vehicles. This model is occasionally used for larger vehicles by other authorities. It would be worth exploring whether such a model could attract new entrants into the market, particularly exploring opportunities for people to undertake dual caring and driving roles.
- Operator provision of Passenger Assistants as part of their contract. This cuts down administration and dead-time/mileage associated with picking up and returning council-provided PAs. This approach is frequently deployed by other authorities. The THC approach whereby PA provision is primarily a school function, excluding the need for the Transport Unit to intervene, is relatively unusual, although to the extent that schools utilise existing education support staff to create the PA capacity it may well be cost effective. The costs associated with this are not part of the Transport budget.

2.30 There may be a longer-term role for THC to stimulate and support new entrants into the driving profession and potentially into the private hire or PSV market. Given the growing driver shortage, an apprenticeship scheme could help create a new supply. It could also receive external financial support associated with upskilling the workforce. If linked to the community transport sector it would ensure that trainees worked with more vulnerable passengers developing habits that would usefully transfer to mainstream passenger transport. The achievement of accredited driver qualifications could be staged to ensure a useful work contribution before the trainees move on.

2.31 We do not consider that more radical competition models such as reverse auctions or creating a call-off option at a mileage rate set in advance by THC would be useful in the longer term, particularly as such approaches do nothing to stimulate new market entrants. The same applies to general outsourcing of school transport arrangements to procurement specialists who would face exactly the same problems of supply as THC Transport Unit does, but without the ability to integrate school, public and community transport.

### Operations

2.32 We examined the in-house THC operations in some detail. In general, the arrangements do pursue flexible ways of keeping costs down and are fit for purpose. The operation is relatively small scale with one supervisor, 10 drivers and 14 vehicles (additional driving capacity is provided by two schools). Arrangements include staff training that meets good standards and contributes to Continuous Professional Development.

Comparison of annual pupil trip costs between in-house and commercial operators supports the view that the current fleet operations offer good value.

2.33 Relations with external operators are felt generally to be good and this view is buttressed by the results of a relatively recent survey of external contractors which examined a number of aspects of the commissioning relationship.

2.34 Operational issues identified during the work included:-

- The impact of the (PSVAR) Public Service Vehicle Accessibility Regulations on the availability of buses for school contracts. These regulations require full wheelchair access to all local bus services on vehicles with 23 or more passenger capacity and the deadline for this has passed. It had been assumed that dedicated school buses not available to the public were exempt, but any charging for transport that takes place brings the vehicle within the PSVAR remit. This means that privilege lift places can only be offered on PSVAR compliant vehicles or else without charge. There aren't enough PSVAR vehicles available for school bus work. At present, the DfT has provided temporary exemptions, but it is unclear how long this grace period will last.
- Parental, pupil and school expectations on reliability and punctuality are mostly realistic, reflecting the reality of weather and road conditions in Highland
- Emergencies are uncommon

#### Monitoring

2.35 THC lacks a consistent operational service quality and safety monitoring function. Most current service monitoring is reactive. Such an approach risks identifying safety failings after something has gone wrong, not before. The safety audits we undertook support this concern.

2.36 There is no active research into customer satisfaction – the assumption is that if there are problems then pupils, parents, carers, schools or operators will react and where relevant this might be registered as a complaint. However, this approach does not allow for service users and other stakeholders to identify their priorities for service improvements.

2.37 There are limited metrics in place for objective monitoring of operator performance – although there are performance requirements in the contract conditions these are confusing and, in some cases, appear contradictory. It is true that, as might be expected, COVID-19 had a significant impact on on-site monitoring. But THC's approach to monitoring does not appear to have been extensive or proactive before then. Our understanding is that in general only occasional spot checks took place, with much reliance on schools to monitor on site, and mostly responding to issues through dialogue between Transport Officers and operators. The geography of Highland supports this distributed approach to service monitoring and no major issues have been identified or reported.

The generally acceptable performance of operators means that it has not been necessary to apply penalties or sanctions very frequently and there is also a concern not to alienate operators given the fragile state of the market, but as with customer satisfaction this undermines the potential for continuous improvement. Given the low sample size for spot checks, this cannot be taken to signify that issues have not occurred and gone unreported.

2.38 Note that we are not suggesting a lack of standards – these are set out in the contracts with operators and although we have suggested a number of improvements, they are in general fit for purpose.

2.39 We undertook site visits at four schools to observe school transport arrivals and departures, with a particular focus on passenger safety. Full audit reports with photographic evidence have been provided to the Transport Unit. Mainstream school transport did not reveal any problems. However, the arrangements at ASN schools revealed significant failures in the use of wheelchair tie downs and passenger restraint systems, as well as the use of modified vehicles which have not obviously been tested for compliance with safety standards. This confirms to us that:-

- There isn't an adequate vehicle and equipment testing regime – we think that one or more of these vehicles may have been tested as a taxi or private hire vehicle but without the wheelchair access features being subject to test
- Regardless of the requirement in the contract for the contractor to ensure that staff have been trained in the use of safety equipment, the staff who were driving on the days of our safety audit had not been adequately trained in the appropriate use of equipment. In some cases, very basic errors were made which significantly increased the likelihood of passenger injuries in the case of an accident.

Whilst our inspections remain a 'snapshot' of a particular two days, it was clear from conversations with the drivers that the irregularities reflect long-standing habits and practices, and so the risks to which pupils have been exposed has likely occurred each time they have travelled. These inspections highlight a small percentage of the operators involved and it is of course arguable how far they can be considered representative.

2.40 Other issues identified and discussed include:-

- Improvements to the current general operational standards and the shortage of newer and greener vehicles in the market.

- Training curriculum for drivers and PAs. The conditions of contract state “*The Authority may specify training needs for escorts and drivers on Contract Routes transporting children with additional support needs*” but there is no consistent, universal and comprehensive requirement in place. In particular there is a gap regarding active safeguarding training for drivers who will come into contact with potentially vulnerable young people and who are therefore in a position to notice any signs of abuse. The Scottish Public Services Ombudsman has criticised Angus Council for failure to provide such protection training for its drivers.
- Traffic management and safety issues at school sites – particularly to ensure that there is a clear and shared understanding as to where responsibilities lie between the Council, the school and the operators
- A more consistent approach to the use of photo ID for drivers and PAs

2.41 Our assessment is that there is inadequate staffing capacity within the Transport Unit to support the necessary contract performance and safety monitoring programme which on the one hand is justified by the level of spend and on the other is required by the results of the sample safety audits undertaken.

#### Reporting & Review

2.42 The current reporting and review arrangements do not appear to us to be systematic enough, given that the total budget value involved exceeds £10m. There are two issues that stand out:-

- The lack of any transport management software to support the provision of management information
- The absence of a working Service Level Agreement between Education and the Transport Unit.

2.43 For management information, the current use of a series of linked worksheets within an overall Excel spreadsheet, divided across three transport areas, makes consistent and, where necessary, bespoke reporting challenging. There are limits to automating this process through macros. The result constrains the frequency of effective review and also makes information more difficult for the Education client to access.

2.44 Deploying a new Passenger Transport Management System should bring about a number of benefits for the PTU including:-

- More integrated system for managing the end-to-end business process:
  - Streamlined procedures for booking and scheduling trips
  - User-friendly interface and tools for data management

- Easier access to information and enhanced reporting capabilities
  - Better management information to measure performance
  - Improve efficiency of transport contract management
- Optimise route planning and schedules
  - Flexibility to explore different options
  - Reduce costs

2.45 The lack of a working SLA is important, because, as shown in the next section, our view is that the school transport budget requires joint management. An SLA sets out how this will be done. The draft SLA in its current state is missing a number of key components. It should spell out:

- The baseline activity volumes, suitably disaggregated
- Standards and response times by both parties [some of this is present]
- The frequency of SLA monitoring meetings
- The standing agenda for monitoring meetings
- The Key Performance Indicators
- The Management Information to be presented to the SLA monitoring group, including volumes and costs (absolute and unit)
- Resolution procedures in case of disagreement

2.46 We are not aware that any consistent environmental impact data is captured and reported on in respect of school transport.

#### Budget Creation

2.47 The issue arises where the budget(s) for school transport should be held and managed – whether with Education or Community Services. The location should reflect the ability to take decisions that impact on costs. These costs decisions are those which cover demand management on the one hand and supply-side costs on the other.

2.48 Where there is little discretionary demand, as is the case with mainstream school transport, it makes sense for budget management to be linked with supply-side costs as this will be the key means of controlling costs. This is particularly supported by the overlap between school buses and public bus services commissioned by THC. These are issues that come within the transport remit and that require a corporate viewpoint. Eligibility for mainstream school transport is primarily a matter of following rules about catchment and walking route distances, so it is easy for Education to delegate this function to Transport. A main area of 'discretion' is about whether a route is 'safe' – again this falls clearly within Transport's professional expertise and they also have means (highway investment) to turn an 'unsafe' route into a 'safe' one.

It can be seen that there is little that Education can do to influence the costs, but that Transport has several tools at its disposal. This is why budget management should sit with Transport.

- 2.49 However, where there is considerable demand discretion and fewer supply-side tools, then many authorities will locate school transport budget management on the demand-side i.e., with Education. It is certainly the case that school transport for children with ASN involves discretion in both eligibility for THC travel support and the type of travel support that is appropriate. These decisions require a case by case understanding of individual pupils' needs, liaising with the schools, child psychologists, occupational therapists and other clinical professionals. The tools available to Transport to manage the resulting supply-side costs are more limited. Once a decision is made, for example, that a child has to travel alone or within strict journey-time limits, the opportunities to seek savings through logistical efficiency are limited – the Transport Unit either has to deliver the service with in-house resources or go out to the market. This suggests that the budget for ASN school transport should sit with Education as their staff have the greatest influence on the cost outcome.
- 2.50 Having set out the above, we have observed over the past 30 years that when faced with a mismatch between the school transport budget and the outcome spend, authorities regularly respond by removing the budget from Transport and placing it with Education or vice versa. In some cases, we have observed it transfer backwards and forwards every five to seven years. Whilst the initial transfer may have a savings effect by forcing new staff to look at arrangements with fresh eyes, it is clear that the critical issue is not where it is located but how it is managed. Both sides have an important role to play and this needs to be undertaken jointly, within an agreed structure for sharing cost information and decisions, as proposed in the previous section. For example, ASN transport and travel support decisions should always include consideration of the costs of alternatives.
- 2.51 Clearly, there needs to be continuous pressure to obtain best value. But there needs to be an analytic framework to identify where cost reduction decisions can be made, as well as to predict where budget pressures will be found. The objective is to create a 'no surprises' environment as regards budget management. This suggests an approach to budget creation by developing a build-up model that contains both demand-side and supply-side elements. At a simple level the cost of transport will change if the number of pupils or students who are assessed as eligible for travel support changes; similarly, it will change if the cost of travel resources changes, either by external forces (e.g., government raising the national living wage) or THC actions (e.g., more efficient schedules). Build-up cost models are not an excuse to avoid facing up to financial constraints facing the authority (we need to save £X thousand) – they are intended to create a disaggregated model which makes it easier to identify the individual areas where current arrangements should be challenged.

2.52 Our analysis of the unit costs faced by THC support this approach. We have looked at the costs per pupil transported by vehicle type as well as the daily costs faced by THC by vehicle capacity and accessibility. We have also benchmarked THC transport expenditure against that faced by other rural Scottish authorities. The results show that THC comes within the range of costs that can be reasonably expected. For example, the Table below compares unit transport expenditure in 2019/20 for pupils on the school roll, using Scottish Local Government Finance Statistics.

**Table 1: Scottish Rural Authorities: School Transport Expenditure: 2019/20**

Authority	Cost of Transport per Pupil on Roll
Angus	£211
Stirling	£228
Dumfries & Galloway	£255
Fife	£286
Moray	£321
Highland	£331
Scottish Borders	£354
Perth & Kinross	£467
Argyll & Bute	£467
Aberdeenshire	£496
Orkney Islands	£847
Shetland Islands	£883
Na h-Eileanan Siar	£983

2.53 As with all such statistics there are a variety of caveats. For example, not all authorities have the additional complexity of Gaelic Medium education and there are differences in cost allocation between school and public transport where one service serves both purposes. But they do not suggest that THC is an outlier, nor do they identify particular areas of costs that would imply that focusing on a small number of actions could deliver the cost savings required.

2.54 Instead, we suggest that there is a long list of actions, covering both demand and supply management, each of which can be expected to contribute in a small way to savings targets.

### 3. Recommendations

#### Policies

3.1 We recommend improving the policy in the following areas:-

- It should be renamed as a Travel Support policy with additional information about alternative travel arrangements that can meet the Council's duties, including Independent Travel Training, Cycling and parental or student travel budgets.
- It should include a statement about environmental sustainability objectives related to school travel, including for both entitled and non-entitled children e.g., walking buses and Bikeability and a link to School Travel Plans.
- It should contain expanded references to the specific standards that pupils and parents can expect from the transport or travel support provided, the codes of conduct for both transport providers and parents and risk assessment processes in place including at school sites.
- The statement that "*it is expected that children aged 12 or over will be able to walk unaccompanied...*" runs the risk that the Council will come under pressure to make some form of provision in cases below that age even if not required. The Council is not under a duty to express a view on what age a child can walk a route unaccompanied – that is a parental decision. This might be better converted into internal guidance, but ultimately a case-by-case decision is required.
- The separate policy on transport to GME (Gaelic Medium Education) should be incorporated in the main policy.
- The appeals process section should be reinforced with more detail about the staging and to include escalation to external agencies. We recommend reviewing whether member involvement is required, as well as the process of providing legal advice to panel members to ensure that they only consider specific relevant circumstances.
- The Policy would benefit from improved layout and presentation values to make it easier to read. It should be clear whether either a Gaelic or an 'easy-read' version is available.
- The summary of the policy on the THC website, whilst admirably brief, needs to be expanded slightly to avoid raising expectations that transport would be provided automatically to pupils with ASN.



## Eligibility

### 3.2 We recommend that THC should:-

- consider whether all applications for travel support should be electronic
- review the role of schools in the application and eligibility process, given the move to electronic application.
- commission suitable transport management software that would support the above as well as possible gaps in its geographical management of school transport. [This recommendation is repeated with reference to other points below.]
- review means of obtaining electronic confirmation that individual pupils have made use of THC provided transport
- establish a formal process for discretionary decisions that provides records of the basis for decisions and an agreed review date.

## Transport Options

### 3.3 We recommend that THC should:-

- Examine the feasibility and business case for establishing an Independent Travel Training function, making use of the considerable literature and experience that exists across GB.
- Establish a programme that promotes and offers the use of bicycles, accompanied by suitable safety protection and Bikeability training. For appropriate pupils this should include the provision of e-bikes. This should be linked to the development of a safe cycling route assessment system. This should be targeted at 'entitled' children as a means of reducing the Council's costs. In principle it could extend to 'non-entitled' children in order to reduce the scale of the 'school run', but that would require a separate business case and funding stream.
- Review the current travel cost reimbursement system with a view to making it financially more attractive and to reflect the fact that it is more cost-effective for the authority to reimburse the parent to act as a PA (passenger assistant) than it is for the school or for a contractor to employ a PA.
- Establish a community transport support strategy that has the objective of developing the sector's capacity whilst ensuring that the Council benefits by creating additional options to meet its statutory transport responsibilities whilst generating added community benefit.

## Planning

### 3.4 We recommend that THC should:-

- Commission integrated transport management software to replace the existing Excel model and to significantly increase the system's functionality and reporting capacity
- Use the challenge created by the introduction of free transport for Under 22's to review its policy and practices in respect of service provision for non-entitled pupils and students so that the Transport Unit has guidance, metrics and targets to assist decision-making in this area. This may involve reducing commissioned spare capacity where not needed by entitled pupils – THC should ensure appropriate publicity of service withdrawal to minimise negative feedback.

## Procurement

### 3.5 Much of what THC does already meets good practice (e.g., use of DPS, engagement with community transport, tactical use of in-house provision). We recommend that THC should:-

- Revise the Conditions of Contract and associated Appendices to achieve the improvements identified
- Review the approach to self-employed / sub-contracted drivers to ensure that the necessary controls and assurances are in place (especially insurance) and there is clear guidance as to the treatment of self-employed drivers within the procurement process
- Consider whether and how to enforce or promote "real living wage" employment within school contracts
- Streamline the performance management process so that it matches what is practically required and which the Transport Unit has the capacity to deliver
- Reinstate a programme of supply market engagement and research with associated publicity of forthcoming and longer-term opportunities
- Explore ways in which the Council can directly offer a consistent and comprehensive training package for operator frontline staff delivering school transport, particularly for pupils with ASN.
- Examine the potential for groups of parents to share transport provision for entitled children.
- Examine the feasibility of a driving training scheme to introduce new drivers into the larger vehicle passenger transport

## Operations

3.6 We recommend that THC should:-

- Set out the safety and operational standards for the in-house fleet operation in a reference document that is publicly available for transparency.
- Introduce a more systematic approach to operators and new drivers introducing themselves to pupils and their families before they start to provide the service.
- Develop a system to formalise the operator responsibility to assess and confirm suitability of agreed pick up and drop off locations
- Provide schools with transport site risk assessment tools and guidance to meet their responsibilities as site owners, reflecting the fact that contractors may need to wait in a particular location and to drop off/pick up at a particular time and location which may be on the public highway rather than the school premises, so there needs to be agreement as to the relevant safety responsibilities between the school, the Council and the operator.

## Monitoring

3.7 We recommend that THC should:-

- Develop a proactive contract monitoring schedule designed to ensure that during the cycle:
  - All major schools receive at least one visit
  - More frequent visits are planned to ASN schools
  - There is equitable coverage of operators
- Identify appropriate resources to make suitably trained staff available
- Develop a proposal for discussion with operators whereby THC would commission and control a training programme that would be mandatory for frontline staff involved in school transport

## Reporting & Review

3.8 We recommend that THC should:-

- Complete the specifications, procure and commission a Passenger Transport Management System (PTMS) as soon as possible
- Draw up a more focused Service Level Agreement between Education and Transport Unit that provides the basis for consistent performance and cost management
- Ensure that the PTMS and the SLA incorporate adequate environmental impact metrics to enable informed decisions to be made

- Develop a rolling schedule covering at least a year for SLA monitoring meetings and standard management information provision

### Budget Creation

3.9 We recommend that THC should:-

- Create the framework for a build-up budget that identifies the principal factors behind cost changes and gives the basis for more accurate forecasts of outturns. This should inform the suite of metrics within the SLA.
- Draw up an Implementation Plan that prioritises actions and an associated reporting framework from within a 'long list' of cost-saving activities identified within this review.