



Draft School Travel Policy 2025/26
and **Draft Post-16 Travel Policy Statement 2025/26**
consultation report

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- Southampton City Council undertook public consultation on draft proposals to update two related policies: the School Travel Policy 2025/26 and the Post-16 Travel Policy Statement 2025/26.
- This consultation took place between **09 September** and **28 October 2024** and received a total of **95** responses.
- The aim of this consultation was to:
 - Communicate clearly to residents and stakeholders the draft proposals regarding changes to the two policies;
 - Ensure any resident, business or stakeholder who wished to comment on the proposals had the opportunity to do so, enabling them to raise any impacts the proposals may have, and;
 - Allow participants to propose alternative suggestions for consideration which they feel could achieve the objectives in a different way.
- This report summarises the aims, principles, methodology and results of the public consultation; it provides a summary of the consultation responses both for the consideration of decision makers and any interested individuals and stakeholders
- It is important to be mindful that a consultation is not a vote – it is an opportunity for stakeholders to express their views, concerns and alternatives to a proposal; equally, responses from the consultation should be considered in full before any final decisions are made
- This report outlines in detail the representations made during the consultation period so that decision makers can consider what has been said alongside other information



Southampton City Council is committed to consultations of the highest standard, which are meaningful and comply with the *Gunning Principles* (considered to be the legal standard for consultations):

1. Proposals are still at a formative stage (a final decision has not yet been made)
2. There is sufficient information put forward in the proposals to allow 'intelligent consideration'
3. There is adequate time for consideration and response
4. Conscientious consideration must be given to the consultation responses before a decision is made



New Conversations 2.0
LGA guide to engagement



Rules: The Gunning Principles

They were coined by Stephen Sedley QC in a court case in 1985 relating to a school closure consultation (R v London Borough of Brent ex parte Gunning). Prior to this, very little consideration had been given to the laws of consultation. Sedley defined that a consultation is only legitimate when these four principles are met:

1. **proposals are still at a formative stage**
A final decision has not yet been made, or predetermined, by the decision makers
2. **there is sufficient information to give 'intelligent consideration'**
The information provided must relate to the consultation and must be available, accessible, and easily interpretable for consultees to provide an informed response
3. **there is adequate time for consideration and response**
There must be sufficient opportunity for consultees to participate in the consultation. There is no set timeframe for consultation,¹ despite the widely accepted twelve-week consultation period, as the length of time given for consultee to respond can vary depending on the subject and extent of impact of the consultation
4. **'conscientious consideration' must be given to the consultation responses before a decision is made**
Decision-makers should be able to provide evidence that they took consultation responses into account

These principles were reinforced in 2001 in the 'Coughlan Case (R v North and East Devon Health Authority ex parte Coughlan²), which involved a health authority closure and confirmed that they applied to all consultations, and then in a Supreme Court case in 2014 (R ex parte Moseley v LB Haringey³), which endorsed the legal standing of the four principles. Since then, the Gunning Principles have formed a strong legal foundation from which the legitimacy of public consultations is assessed, and are frequently referred to as a legal basis for judicial review decisions.⁴

¹ In some local authorities, their local voluntary Compact agreement with the third sector may specify the length of time they are required to consult for. However, in many cases, the Compact is either inactive or has been cancelled so the consultation timeframe is open to debate

² BAILII, [England and Wales Court of Appeal \(Civil Division\) Decisions](#), Accessed: 13 December 2016.

³ BAILII, [United Kingdom Supreme Court](#), Accessed: 13 December 2016

⁴ The information used to produce this document has been taken from the Law of Consultation training course provided by The Consultation Institute



- The agreed approach for this consultation was to use an online questionnaire as the main route for feedback; questionnaires enable an appropriate amount of explanatory and supporting information to be included in a structured questionnaire, helping to ensure respondents are aware of the background and detail of the proposals.
- Respondents could also write letters or emails to provide feedback on the proposals; emails or letters from stakeholders that contained consultation feedback were collated and analysed as a part of the overall consultation.
- The consultation was promoted in the following ways:

- Letters issued to schools, colleges, parents and carers;
- Face-to-face and virtual (MS Teams) events with key stakeholders, including the Southampton Parent Carer Forum;

Parents/carers

- > 09 September, Bitterne Precinct
- > 12 September, Civic Centre
- > 18 September, virtual
- > 19 September, Lordshill Community Centre
- > 25 September, Ocean Village
- > 25 September, virtual

Schools/colleges

- > 09 September, virtual
- > 17 September, Civic Centre and virtual
- > 18 September, virtual
- > 23 September, virtual

- Advertisement on the School Travel Service webpage;
- Southampton City Council and SEND team social media and e-bulletins, including Schools (Primary and Secondary) and Family Hubs;
- Directly to parents and carers by the Southampton City Council SEND team;
- Availability of an ‘easy-read’ version of the questionnaire to help more people feel able to respond to the consultation;
- Directly to 134 travel suppliers via the Proactis portal (from 09 October);
- Article in the Daily Echo on 12 September;
- Advertisement through the Local Offer;
- Press release on the day of launch (09 September), and;
- On the Southampton City Council website ‘Have Your Say’ pages.

- All questionnaire results have been analysed and presented in graphs within this report. Respondents were given opportunities throughout the questionnaire to provide written feedback on the proposals. In addition, anyone could provide feedback via letters and emails.



PROPOSAL 1.1 | Changes to the draft policies to improve clarity and understanding

We are proposing changes to the draft policies to ensure they are up to date and to make them clearer and easier to understand. For example, we have a travel hierarchy in the current policy to improve transparency and make it clear the order in which travel options are considered. We are proposing to also include a travel hierarchy in the Post-16 Travel Policy Statement 2025-2026 as well to make this clearer for young people and adult learners.

PROPOSAL 1.2 | Separating the School Travel Policy and Post-16 Travel Policy Statement into two separate documents

Currently we have one policy which covers children, young people and adult learners aged 5 – 25 years old.

We are proposing to separate the document into two policies. The first would cover children of compulsory school age (5 – 16). The second would cover young people of sixth form age (16-18 years, over compulsory school age but under 19 years of age) and adult learners (19 – 25 years, where they are continuing a course started before their 19th birthday). The reason for suggesting this is to align with national policy guidance, make it easier for service users to access age related information, and to make it easier to update the policies when required.

PROPOSAL 2 | Improvements to the personal travel budget offer

Currently, Personal Travel Budgets (PTB) are an option for travel support for children and young people with an Education, Health and Care Plan (EHCP). It is currently a mileage allowance that is given to parents and carers for them to use in any reasonable way to get their child to school.

In the future, we are proposing to improve this offer depending on the circumstances for the parent or carer. We are proposing to offer an additional flexible percentage increase of up to 50% depending upon the circumstances for the parent or carer. For example, they may have other children for which additional financial support towards the cost of breakfast and/or after school club or other childcare would enable them to take advantage of the PTB, the school is outside of the city boundary, or an additional person is required to act as a passenger assistant.

PROPOSAL 3.1 | Post-16 travel grant option and vehicle contribution charge

Currently, we offer vehicle transport as a travel option and do not ask for a contribution towards school travel support when we provide a vehicle, that may be a taxi, minibus or wheelchair accessible vehicle (WAV).

In the future, we are proposing to offer a hierarchy of travel support and propose that one of the options will be a distance-based travel grant, and that the provision of vehicle transport will be agreed in exceptional cases only. Where vehicle transport is agreed, we are proposing to ask for a means tested contribution towards the cost based on the distance from the student's home to their education setting.



PROPOSAL 3.2 | Maximum 18 hours of travel support over three days a week for eligible post-16 students

Currently, we do not say how much travel support we will provide to young people over the age of 16.

In the future, for eligible student over the age of 16, we are proposing the eligibility would be for 18 hours over three days a week. Therefore, the travel support option would only be provided for up to 18 hours over three days.

PROPOSAL 4 | Requirement for post-19 adult learners to evidence need for travel support

Currently, adult learners' eligibility for travel support and the type of provision offered is assessed by Southampton City Council and depends on the learners assessed needs as set out in their EHCP.

In the future, we are proposing that as part of this, post-19 adult learners would be required to provide evidence on why it is necessary for Southampton City Council to provide travel support and why the adult learner cannot use other entitlements for their travel. For example, the use of a mobility vehicle, a bursary or discretionary support from an education setting, or whether the student has support from the council's social care service to assist with travel.

PROPOSAL 5 | Removal of eligibility for school travel support if parents or carers move and want their child to remain at the same school

Currently, if parents or carers decide to move house and want their child to remain at the same school, the council may provide school travel support.

In the future, we are proposing that if parents or carers decide to move and want their child to remain at the same school, the child will not normally be eligible for school travel support. This includes all compulsory school years, including years 10 and 11. Parents and carers are encouraged to consider the cost and distance of travel to the existing school as part of move costs. Exceptional circumstances where we might consider school travel support would be a change to the family structure or employment status.

PROPOSAL 6 | Reduction in notice given to families if travel support has been given in error

Currently, where travel support is found to have been granted in error, one full term of notice is given to allow families time to make other arrangements.

In the future, we are proposing a shorter notice period of either 4 weeks or until the end of the current half term, whichever is the shorter period.

PROPOSAL 7 | Removal of privilege places

Currently, a spare place on a contract vehicle may be offered to a child who is not entitled to travel support. This is known as a ‘privilege place’. Privilege places can be withdrawn if they are needed for eligible children. A contributory charge of £750.00 per annum is paid towards the cost of this travel. Currently, there is no one using this service.

In the future, we are proposing to no longer offer spare places known as ‘privilege places’ to any child who is not entitled to travel support. The only time we may consider a request is for a child who lives at the same address as another child who is entitled to travel support and would be travelling on the same vehicle. The privilege place could still be withdrawn if it was needed for eligible children and we would propose to keep the contributory charge of £750 the same.

PROPOSAL 8 | Increasing the number of nearest suitable schools families can list on school application forms

Currently parents or carers who wish to apply for travel support must list their nearest suitable school on their school application form.

In the future, we will be proposing that parents and carers list their nearest three suitable schools on their school application form. This is to ensure that all three nearest suitable school options can be considered for admission to reduce the number of children who may become entitled to travel support due to distance.



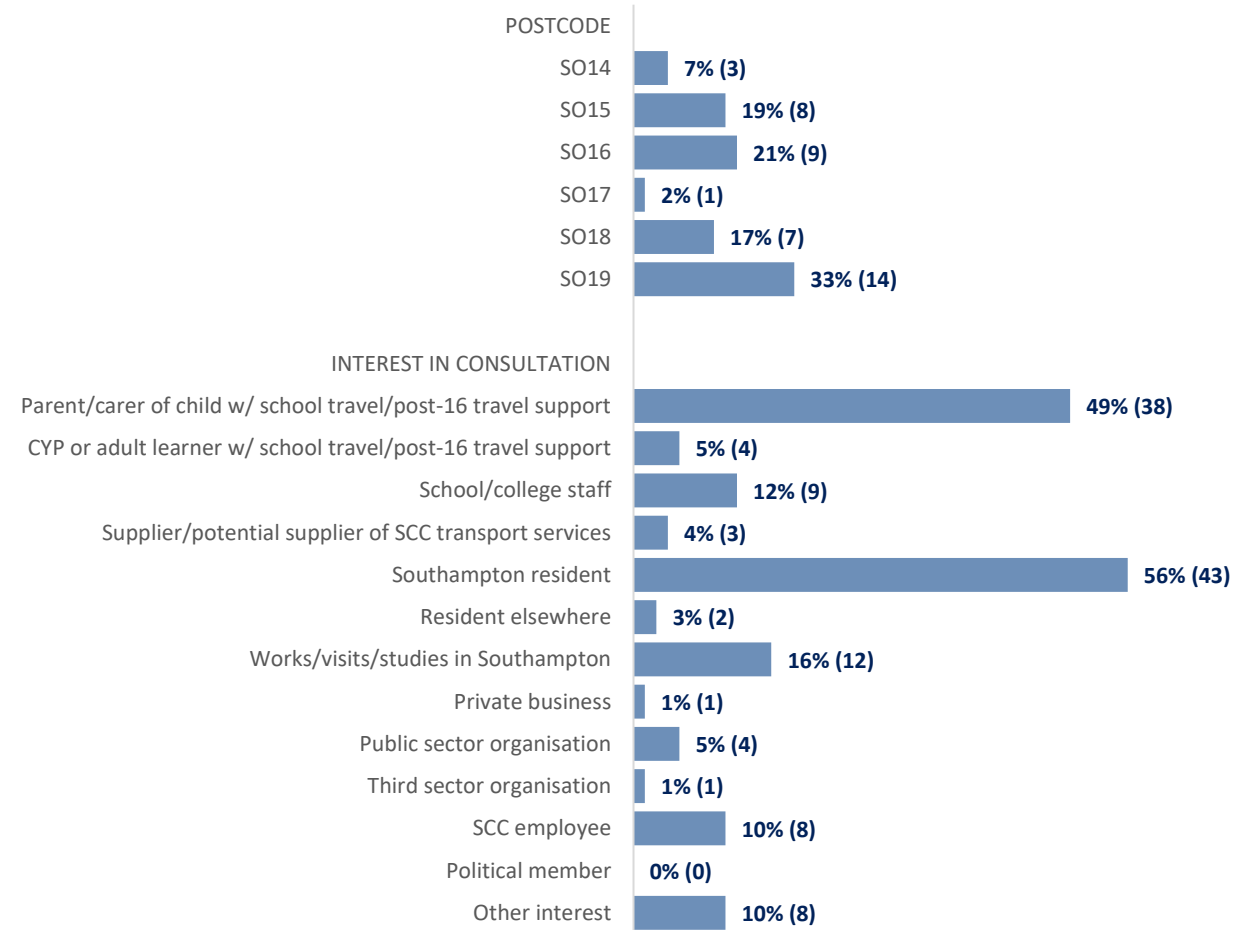
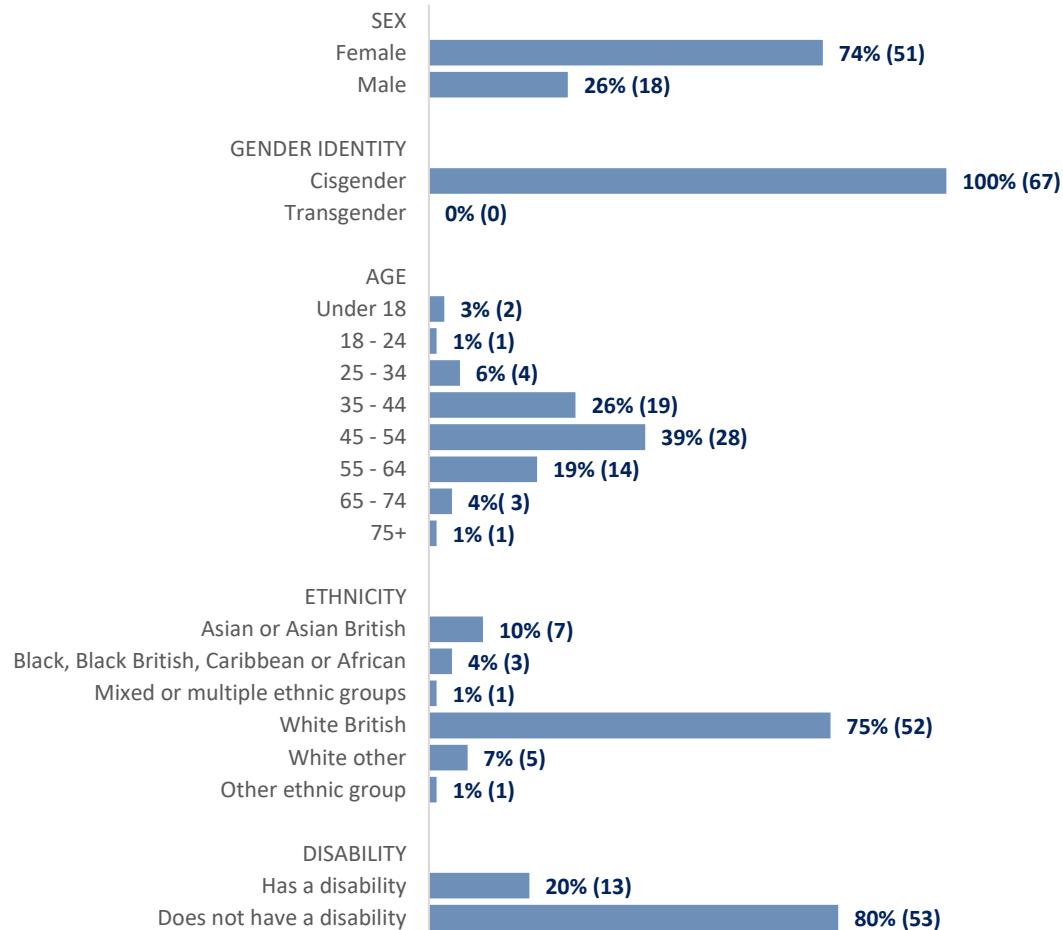


Who are the respondents?

Total responses

86 by online survey
10 by email
96 total

Graphs on this page are labelled as percentage (count).

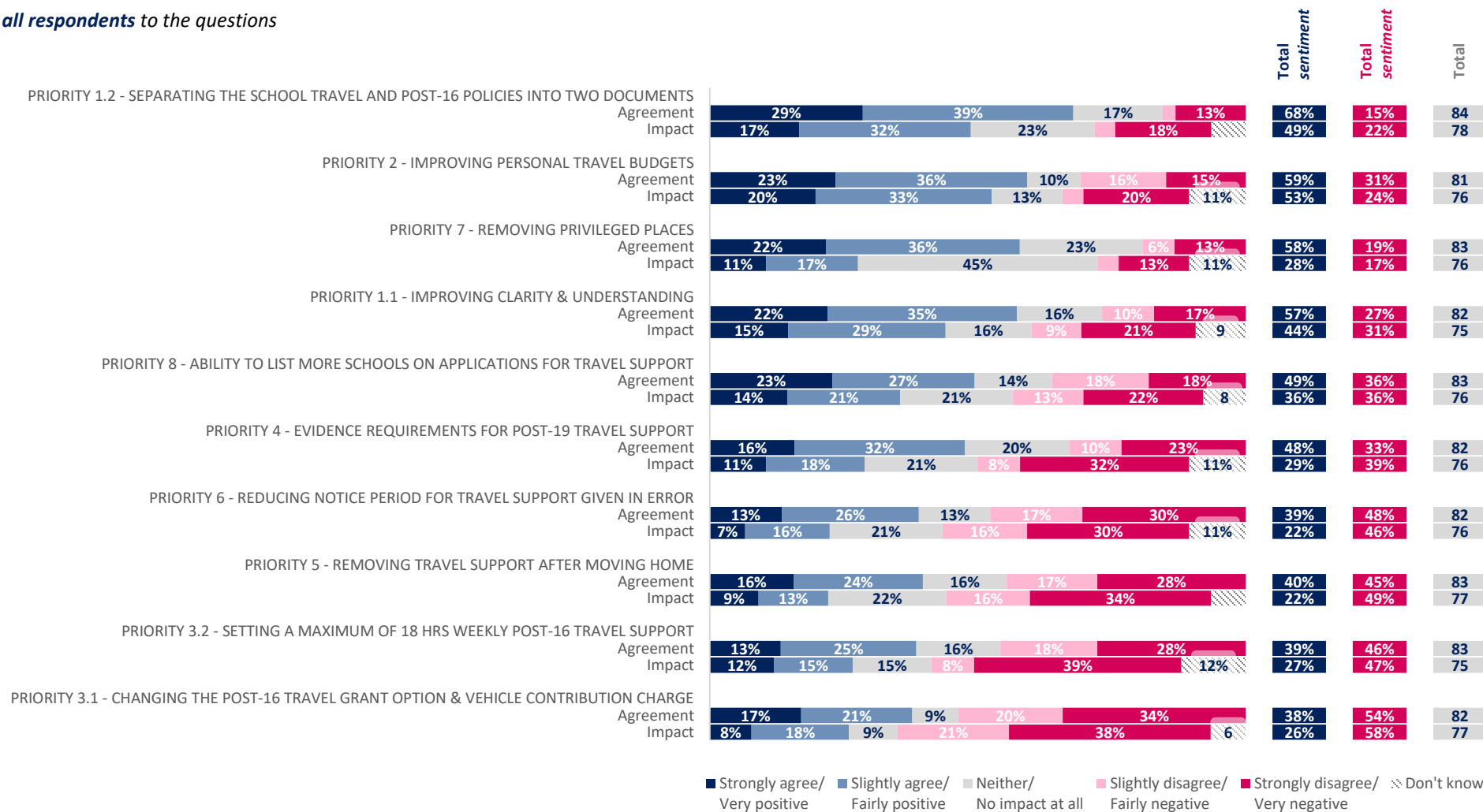




Question | To what extent do you agree or disagree with this proposal?* compared to

Question | What impact do you feel this may have on you, your business or the wider community?

showing **all respondents** to the questions



■ Strongly agree/ Very positive
 ■ Slightly agree/ Fairly positive
 ■ Neither/ No impact at all
 ■ Slightly disagree/ Fairly negative
 ■ Strongly disagree/ Very negative
 ■ Don't know

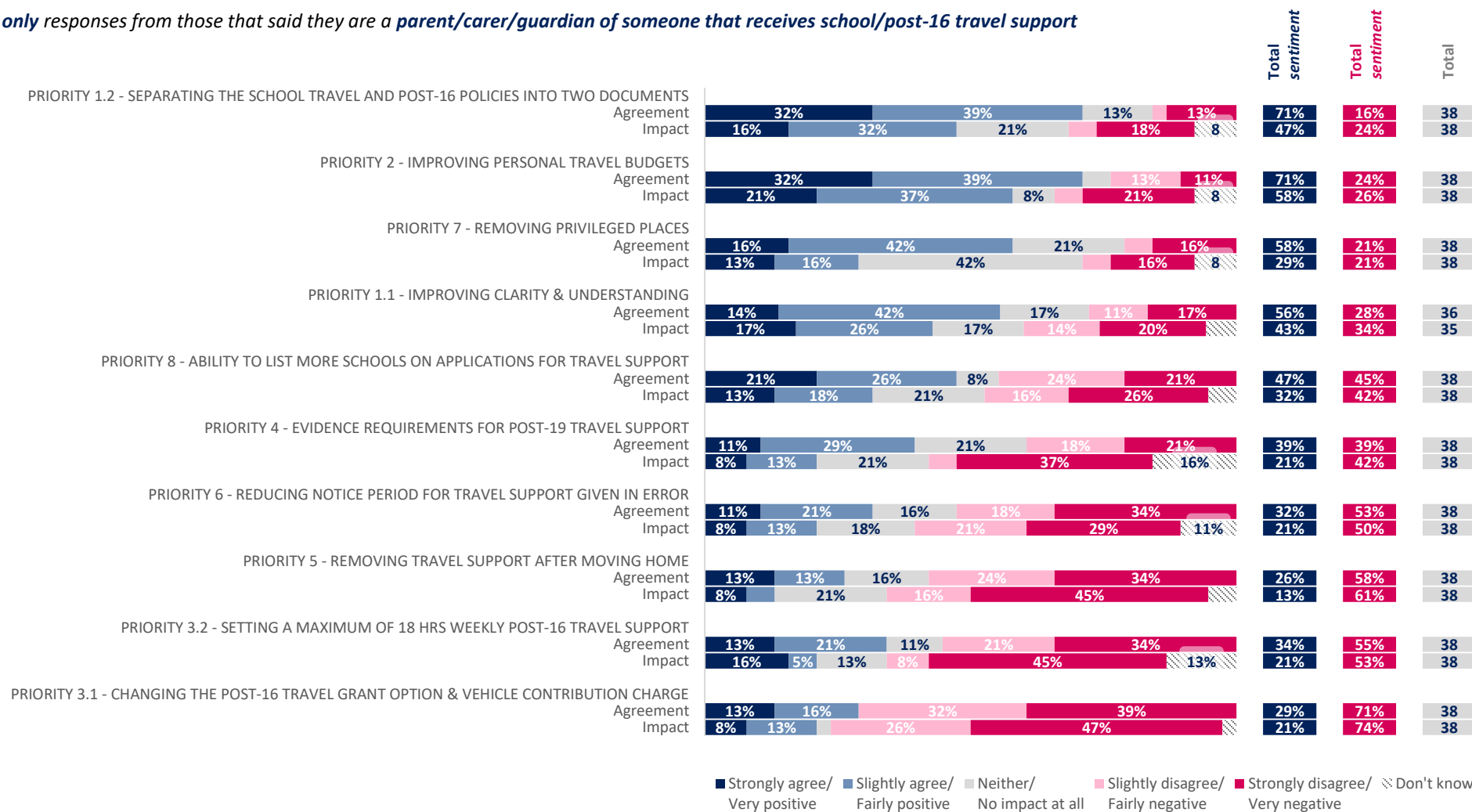


Opinions on the proposals – parents/carers of recipients of travel support

Question | To what extent do you agree or disagree with this proposal?* compared to

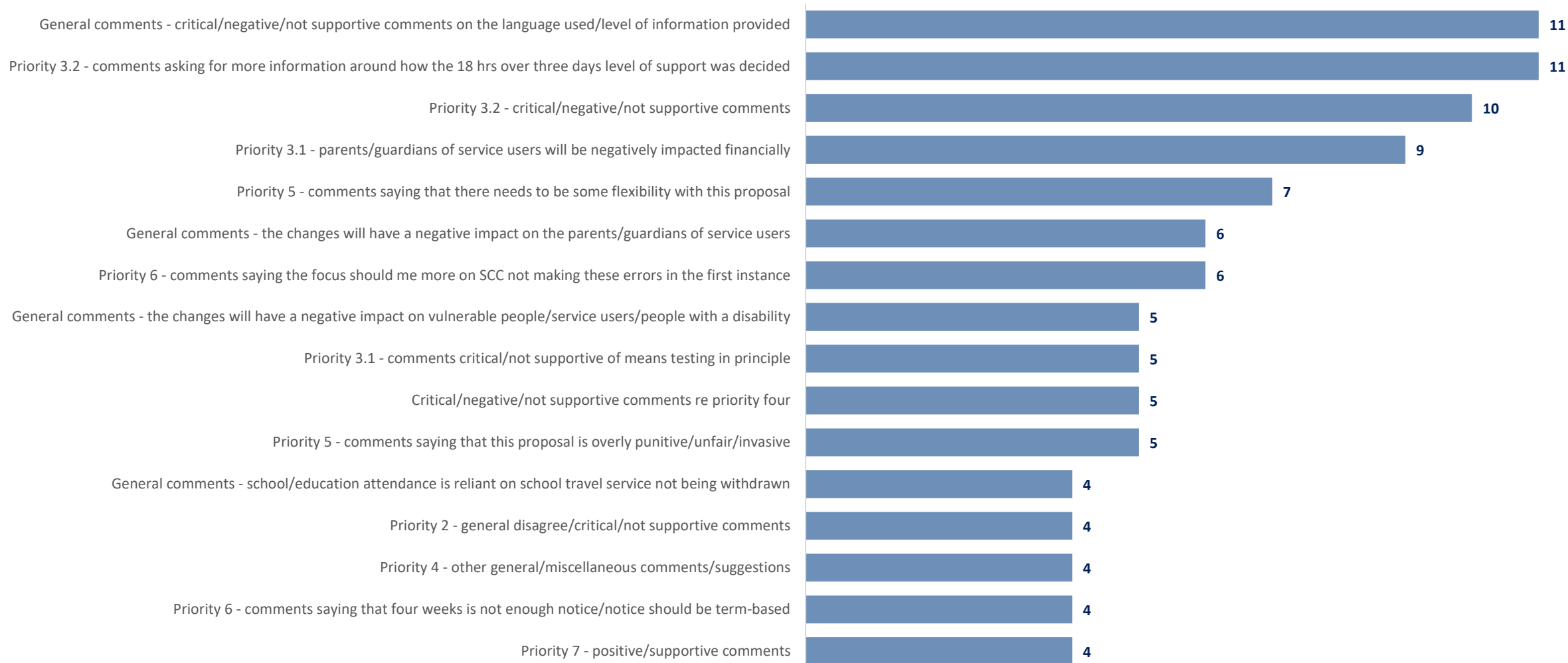
Question | What impact do you feel this may have on you, your business or the wider community?

showing **only** responses from those that said they are a **parent/carer/guardian of someone that receives school/post-16 travel support**





*No. comments per comment theme.





*No. comments per comment theme.

