

HOME TO SCHOOL TRANSPORT - POLICY PANEL

BACKGROUND PAPERS

10.00AM, WEDNESDAY, 3 JUNE 2020

ADDENDUM

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Subject:	Capacity and Resources in the Home to School Transport Service		
Date of Meeting:	27 May 2020		
Report of:	Interim Executive Director, Families, Children and Learning		
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Ward(s) affected:	All		

FOR GENERAL RELEASE

Note: The special circumstances for non-compliance with Council Procedure Rule 3, Access to Information Procedure Rule 5 and Section 100B(4) of the Local Government Act 1972 (as amended), (items not considered unless the agenda is open to inspection at least five days in advance of the meeting) were that discussions with key stakeholders could not be completed in time given the demands of responding to the Covid 19 pandemic.

1 PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1. The report recommends an increase in the staffing capacity of the Home to School Transport Service in response to recent difficulties and the recommendations of an Independent Review of the service, published in March 2020.
- 1.2. The report also recommends that the budget for the Home to School Transport Service is re-based to take account of benchmarking data with other Local Authorities, and the pressures resulting from an increase in a rise in the numbers of children and young people identified with special educational needs and disabilities.

2 RECOMMENDATIONS:

- 2.1. That the Committee agrees to the staffing increase suggested in this paper for the Home to School Transport Service.
- 2.2. That the Committee agrees to increase the Home to School Transport budget by £1m from April 2021.

3 CONTEXT/ BACKGROUND INFORMATION

- 3.1. The Home to School Transport Service has been placed on the corporate risk register because of serious difficulties that arose in the Summer of 2019 and which have still not been entirely resolved. Despite progress being made under interim leadership arrangements, the service remains fragile and under-resourced to meet the on-going improvements required.

- 3.2. Low capacity in the team, particularly at times of peak demand, was referenced in the report from the Independent Review Team, published in March 2020.
- 3.3. The Independent Review Report was critical of decision-making in 2019 about this service, and the problematic introduction of a new Dynamic Purchasing System (DPS) system for procurement. Wide-ranging recommendations for improvement have been accepted by the council, with significant additional resource implications.
- 3.4. The service is now identified as a corporate risk given the need for service improvements.
- 3.5. The service overspend has increased significantly since the implementation of new arrangements last autumn and the basis on which the budget has historically been set needs to be reviewed. The recommendation here is to consider re-basing the budget, taking into account benchmarking with our statistical neighbours, and also taking account of the local (and national) rise in the numbers of children becoming eligible for EHC plans, as this impacts similarly on numbers eligible for HTST

Service remit and scope

- 3.6. The council has a statutory duty to provide free home to school transport arrangements as necessary to facilitate the attendance at school of eligible children resident in the area.
- 3.7. In the Spring term 2020, prior to school closures due to the Covid19 pandemic, the service was arranging and managing the transport of approximately 470 children with complex SEN and disabilities to school or college and back each day in term time, on 177 routes operated by 8 different firms (please note numbers quoted are subject to variance).
- 3.8. Many of the children have high risk medical conditions and/ or severe emotional and behavioural difficulties.
- 3.9. Destinations for transport are many and varied, including a wide range of mainstream and special schools and colleges, within and beyond the City borders.
- 3.10. The service also books and arranges transport for social care and manages the system of bus passes.

New Procurement System

- 3.11. The council, responding to an escalating overspend in the HTST budget and perceived lack of effective competition in the sector, commissioned Edge Public Solutions to introduce a new Dynamic Purchasing and Procurement of Operators System for September 2020. Edge began working in April 2019 and challenges in capacity at every level of the system soon became apparent. It is acknowledged that the introduction of the new system was rushed, and serious problems resulted with the service from September 2019. Although most were

resolved for November, some persist, and there has been a very significant loss of trust and confidence in the system and council from families and transport operators.

Budget

- 3.12. The current budget for the service is £2.4M. The overspend at the end of 2019/20 was £968K.
- 3.13. The projected overspend for 2020/21 is £1.2m, although disruption on account of the COVID-19 crisis will impact forecasts this year.
- 3.14. In terms of benchmarking, many caveats apply to section 251 data, including different structures within LAs and variable reporting. Nonetheless, benchmarking for the financial year 19/20 indicates the following:
- The 19/20 budget for Brighton (£2.375m) was 59% lower than the average budget for our statistical neighbours. This equates to £1.4m.
 - BHCC budget increased by 2% from 2018/19. The average increase for our statistical neighbours was 4% and nationally it was 9%.
 - On average our statistical neighbours overspent their 18/19 budget by 7% (nationally this was 16%). BHCC overspent by 9% (£0.210m).
 - Children with EHCPs have increased by an average of 14% each year over the last 4 years. Special school pupil numbers have increased by 2.4%.
- 3.15. This report is recommending that the council recognises the pressures on the service budget, the rise in eligibility of children owing to changes in SEND legislation, and comparison with similar Local Authority budgets and in this context, increases the base budget for the service by £1m. The Medium-Term Financial Strategy 2021/22 went to Budget Council on 27 Feb 2020 and contained provision for an increase of £750k to the HTST budget. Based on current estimates of transport costs together with a staffing increase as detailed below, the recommendation is that this should increase to £1m
- 3.16. This would still mean that the service budget was £0.2m below the statistical neighbour average but careful management of contracts and efficiencies would be employed to ensure the budget balanced in future.

Staffing

- 3.17. The service struggles with capacity issues and has done since before the summer of 2019.
- 3.18. New temporary leadership capacity from mid-January 2020 has enabled significant progress to be made in areas of concern with robust planning for September 2020. However, the COVID 19 crisis has brought new uncertainties and challenges to the sustainability of current services.

- 3.19. The service needs to undertake a range of complex tasks over the next few months, notably:
- meet the wide-ranging recommendations of an independent review;
 - secure new systems to ensure arrangements for September 2020 are not a repeat of the inadequate services in September 2019;
 - respond to the COVID 19 pandemic and the significant difficulties raised for safe transport of highly vulnerable children, in terms of social distancing, cleaning vehicles to prevent contamination and PPE for transport staff;
 - ensure the sustainability of transport firms and staff over the school closure period, with many facing considerable financial difficulty;
 - introduce more robust contract management and compliance monitoring to ensure best value and improved budgetary control.
- 3.20. The current service establishment is small – 1.75 FTE client transport officers (scale 5) and a team manager (interim postholder on M10), plus a new post of SEN caseworker yet to be appointed.
- 3.21. The recommended action is to increase the team establishment to ensure a safe and effective service delivery going forward.
- 3.22. In a high profile and high-risk area, recruitment to new posts needs to take place as a matter of priority to secure the improvements needed.
- 3.23. The current annual staffing costs of providing the HTST are detailed below:

Current Annual Cost of HTST team, including temporary posts

	FTE	Basic	On-costs	Total
Team manager (secondment)	1.0	35,934	9,913	45,847
Transport Officers	1.75	45,862	12,072	57,934
Admin assistant (agency)	1.0	20,788	0	20,788
<i>SEN caseworker (agency)</i>	<i>0.6</i>	<i>27,820</i>	<i>0</i>	<i>27,820*</i>
Interim Head of Service	0.6	78,000	0	78,000
Total		208,404	21,985	230,389

**SEN caseworker post is funded by DSG High Needs Block*

Estimated staffing costs for 20/21, excluding DSG funded post £202,569

- 3.24. The 20/21 staffing budget for HTST is £60k and the Team Manager post (£46k) was to be funded as part of the savings envisaged under the new DPS for procurement of routes. These savings have not materialised.

- 3.25. The additional interim staffing costs (£96k – interim Head of Service and admin support) were put in place as an emergency measure as part of the HTST recovery plan given the urgent need to address the deficits in the service.

Proposed new HTST structure:

The proposed new structure includes the following:

- 3.26. **New post** – FTE 0.6, 2-year fixed contract - high level interim leadership post at M6, working to a brief to establish a safe and secure service, co-produced with families and other stakeholders, offering best value, with the interests of children and families foremost at all times.
- 3.27. A dedicated team manager at M9 – this post has been previously advertised and did not attract a short-listable field of candidates, so the proposal is to upgrade from M10 to M9, with enhanced duties and responsibilities in the JD.
- 3.28. **New posts** - an increase in transport officers from 1.7 FTE to 3.5 FTE to ensure adequate cover and the implementation of processes and procedures to ensure a safe, family-friendly and compliant service, including at times of highest pressure and demand – it is also proposed to consider the upgrading of these posts from scale 5 to scale 6, contingent on new responsibilities specified in JD.
- 3.29. **New post** – a contract manager post (0.5 FTE) to support procurement, the effective management of contracts and the securing of best value principles in running tenders.
- 3.30. SEND caseworker – this post has already been agreed and will link the service securely with processes in the SEN team (a deficit in this area was highlighted in the independent review report) – this post will be funded from the DSG High Needs Block.
- 3.31. **New post** - administrative support officer – this post will deal with routine processes, such as allocation of bus passes, checking on enhanced DBS compliance in transport staff and general team administration. Currently there is a temp admin worker from Guidant in this post.
- 3.32. **Budget implications of new proposed structure**

Post	FTE	Grade	Basic	On-Costs	Total
Head of Service	0.60	M6	34,831	9,056	43,887
Team Manager	1.00	M9	42,509	11,052	53,561
Transport Officers	3.50	Sc 6	90,303	23,479	113,782
SEN Caseworker	1.00	So1/2	30,229	7,860	38,089*
Admin officer	1.00	Sc 3/4	19,945	5,186	25,131
	0.50	M10	19,303	5,019	24,322

Contract & Compliance
Manager

Total Team costs

298,772

**SEN caseworker post is funded from DSG High Needs Block*

Proposed costs to council general fund, excluding DSG post **260,683**

- 3.33. The on-going costs of £261k would be for 2 years i.e. until Sept 2022 and would then reduce to £217k per year when the Head of Service 2-year post ends. The 20/21 HTST staffing budget of £60k would require additional funding of £201k for 2 years, reducing to £157k from Sept 2022.

The early budget forecast for 2020/21 originally estimated a full year spend on HTST of £3.6m resulting in a budget overspend of £1.2m. The budget overspend included an assumption of additional staffing costs due to the current pressures being experienced by the service. Once the new structure is in place the service can focus on making efficiencies where possible, thereby reducing operating costs where it is safe to do so.

4 DETAILS OF ANY ALTERNATIVE OPTIONS CONSIDERED:

Option 1: Leaving service structure unchanged

- 4.1 The independent review report points to the lack of capacity in the current service to cope, especially at times of peak demand. This was also an issue of concern reported by Edge Public Solutions, who said that they would have expected a larger team from their experience in similar Local Authorities. New interim leads within the team report serious capacity issues to deal with anything beyond the often-intense day to day traffic of calls and issues. The systems and structures needed to ensure a safe and compliant service are not in place yet and their introduction and implementation going forward cannot be guaranteed with the team at its current size.
- 4.2 Currently, day to day business, plus the need to develop and implement a whole range of new co-produced systems and compliance monitoring procedures, is managed by a team of 1.75 FTE transport officers (scale 5) and a team manager (interim seconded - M10) plus some temp part-time support from an interim head of service and a Guidant temp admin support.
- 4.3 The team does not have the capacity for the robust management and compliance monitoring of the expanded number of contracts. This leads to risks within the service, which have been exposed within the last several months. With the introduction of the DPS system, more companies are working on our framework, some of whom have less well-developed management systems of their own and are inexperienced in HTST work.
- 4.4 Some of the key areas where policy and practice needed to be embedded and where greater capacity is needed are listed below:
- spot checks – weekly checks of compliance and vehicle safety are needed at numerous school sites, within and beyond the City borders;

- compliance monitoring visits to contractors' offices as per the contract specifications;
- ensuring training of driving and escort staff – the LA needs a well-developed training offer, plus a robust system for ensuring staff are adequately trained;
- risk assessments - the maintenance of up-to-date risk assessments needs to be part of the job descriptions of transport officers going forward.
- safety and safeguarding concerns – the team needs a robust; safeguarding policy agreed with all companies and enough capacity to investigate concerns raised;
- the team needs capacity to maintain and update its register of enhanced DBS checks on transport staff, which given the turnover of staff in this sector, can be a significant task.

Option 2: not recruiting the M6 year interim leadership post in the new structure (0.6 FTE on 2-year contract)

Alternatives considered:

- 4.5 Leadership could resume as previously under the 'School Organisation' M5 post. This was rejected because of the very substantial need for change and re-development and the need for a clear focus on this service alone. Previous leadership capacity from within 'School Organisation' was over-stretched by the demands of HTST, alongside other significant areas of responsibility.
- 4.6 Providing leadership at a lower grade than M6: while this is a small service, the political aspects of service re-development and the need to regain the trust and confidence of the community are such that very significant leadership and management skills and experience are needed. The person appointed would be required to have direct contact with Members, to be able to negotiate with a variety of stakeholders, and to deal confidently with actions to improve the service in the face of considerable residual volatility and press interest. The time limit of two years for this post recognises that once service improvements are secure and stability regained, there will no longer need to be a post at this level.

Option 3: not recruiting the new post of Contract Manager post (0.5 FTE)

- 4.7 The service could attempt to carry out contract management work within existing capacity. However, staff have not had the training, and nor does the team have the capacity, to manage the increased number of contracts that we now have because of the DPS system introduced last summer. The HTST needs to hold operators fully to account for contractual compliance via contract reviews and compliance checks.
- 4.8 The service needs the capacity to review continuously contracts and route prices to ensure 'best value' i.e. the right mix of quality and price.
- 4.9 The service could rely on support from central services or other FCL teams for this work but other services and teams have not had the capacity in several key areas to support the service as needed.

Option 4: not increasing the transport officer posts and upgrading to scale 6 from scale 5

Alternatives considered:

- 4.10 Transport officer posts could remain at 1.75 posts at scale 5: there are currently two transport officers, one full time and one who works term time only. Cover is a serious issue if one is sick or on leave, the other can be over-stretched by the daily business, which includes a high level of calls, and a daily range of urgent and sometimes emergency issues. This can lead to longer than response times and a loss of confidence from families using the service.
- 4.11 The council could retain these posts at Scale 5. However, the job description currently does not include a requirement for skill and expertise in the areas that need to be carried out by transport officers:
- risk assessments: these have not previously been a part of the role, but are essential to the safety and wellbeing of children and young people;
 - monitoring of contractual compliance: visits to operators need to take place to check on compliance with key requirements, including those relating to safe practice;
 - processing allegations/ concerns, including those relating to safeguarding, alongside the team manager and LADO as necessary.
- 4.12 The above tasks would normally be graded above scale 5, hence the request for an upgrade of these post consequent on new job descriptions.

5 COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1. The service is working hard to regain the trust and confidence of the community but within a context of a serious lack of capacity, and a significant overspend.
- 5.2. Families and children are at the front and centre of all proposed improvements and all new policies and operational practices are being co-produced with the Parent and Carers Council, using feedback from the families using the service.
- 5.3. Wherever possible, new guidance and policy is published for consultation before being finalised with all stakeholders, including transport operators and schools, as well as families.
- 5.4. Once schools are fully re-opened, a survey of parents/ carers' view on the HTST service will be carried out and then conducted annually and the service will incorporate feedback into securing further improvements.

6 CONCLUSION

- 6.1 The service has been through a period of turbulence and needs to regain the trust and confidence of the community and stakeholders.
- 6.2 This is a statutory service providing transport for very vulnerable children and young people.
- 6.3 The budget is well below the average for our statistical neighbours and even including the projected overspend, remains below the average for statistical neighbours.

- 6.4 The HTST team does not have the capacity for daily operational demands and the improvements required.
- 6.5 Substantial progress has been made following difficulties in the autumn term 2019, but to secure a quality sustainable service for the future, the team needs to be of sufficient size and expertise to tackle all challenges and to work with a budget that recognises the current pressures and context.

7 FINANCIAL AND OTHER IMPLICATIONS:

Financial Implications:

- 7.1 The early forecast for 2020/21 originally estimated a full year spend on HTST of £3.6m resulting in a budget overspend of £1.2m. Within this estimated spend there was an assumption of additional interim staffing costs due to the current pressures being experienced by the transport team. Compared to the projected interim costs, the revised staffing structure proposed in the report will not therefore increase the forecast costs in 2020/21 as this will have only a part-year effect. The Families, Children & Learning Directorate is managing the 2020/21 position 'at risk' as part of its wider budget strategy.
- 7.2 The proposed staff team outlined within the report has a total cost of £0.299m of which £0.038m would be funded by the Dedicated Schools Grant. The current annual budget available to fund the transport team amounts to £0.060m. Additional full year funding of £0.201m would therefore need to be identified from 2021/22. From 2022/23, if the Head of Service post was no longer required, this would reduce to £0.157m on a permanent basis.
- 7.3 In terms of transportation costs, the Medium-Term Financial Strategy (MTFS) presented to Budget Council on 27 February 2020, outlined that pressures on the Home to School Transport budget were predicted and would need to be recognised from 2021/22. The Budget Book (Appendix 1, Page 114 of the Budget Report) included a provision of £0.750m toward Home to School Transport pressures. This report indicates that this should be increased to £0.800m bringing the total additional funding requirement in 2021/22 to £1m. This is an increase of £0.250m on the original MTFS provision and will therefore increase the predicted budget gap of £9.300m in 2021/22 by a further £0.250m to £9.550m.

Finance Officer consulted:

David Ellis

Date: 11.05.20

Legal Implications:

- 7.4 The Council is under a statutory duty to promote the use of sustainable travel and transport and to ensure suitable travel arrangements are made, where necessary, to facilitate a child's attendance at school (Section 508 Education Act 1986). The proposals in this report are made pursuant to those duties and the associated statutory guidance.

Lawyer consulted:

Elizabeth Culbert

Date: 18.05.20

Equalities Implications:

- 7.5 The large majority children transported by the service have complex special educational needs and disabilities. The Equalities Act of 2010 requires the council to make reasonable adjustments to ensure disabled children are not treated less favourably or subject to unfair treatment.

Any Other Significant Implications:

None

Crime & Disorder Implications:

- 7.6 None

Risk and Opportunity Management Implications:

- 7.7 The Home to School Transport Service is a corporate risk and actions have been identified to mitigate these risks.

SUPPORTING DOCUMENTS

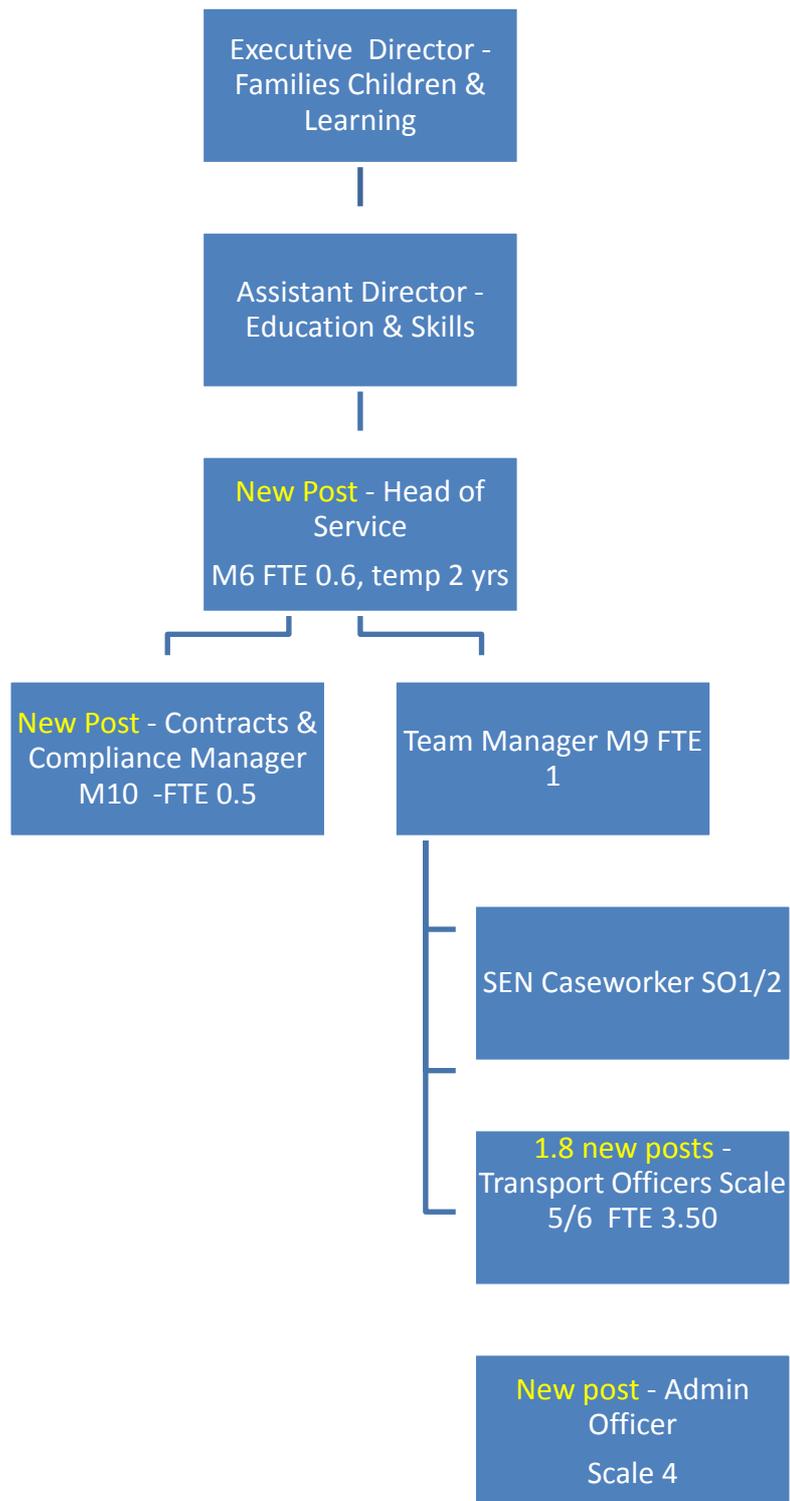
Annexes

1. The independent review report
[Brighton and Hove-HTST independent review-Final draft \(005\).pdf](#)
2. Report to Members Policy Panel
[Members Panel - Home to School Transport report 27.2.10.docx](#)

Appendices

1. Appendix A – Proposed new structure for HTST Service: Structure Chart

Proposed new structure for HTST service: structure chart



Home-to-School-Transport Arrangements for September 2020

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Background:

The Home-to-School-Transport Service fully recognises and acknowledges that the transition to 2019/20 academic year did not go well for our service and that this caused a very significant and negative impact on the children and families who rely on us.

A key priority for the Home-to-School-Transport service at this time is ensuring that we do not repeat the mistakes of last September and that the transition to the 2020/21 academic year is achieved in a way that causes minimal disruption to the children and families who rely on our service and that they are fully aware of their Home-to-School arrangements in advance of September 2020.

There are challenges, however, in sustaining services over the pandemic period, with school closures and the financial challenges facing both councils and suppliers. Actions to ensure a sustainable service for when schools re-open are being finalised and there will be individual discussions with firms about their particular circumstances and the relief to be requested both from government schemes and from the council. The council is particularly concerned to ensure the sustainability of the workforce, both drivers and VPAs.

Moving Forward:

With the above in mind Home-to-School Transport have planned for the following:

Children and Young People currently using our service who will continue using HTST in the new academic year:

- Children and young people who are currently using our service and will continue to use our service in the 2020/21 academic year and will be attending the same educational setting will not need to re-apply for Home-to-School-Transport
- Children and young people who are currently using our service but will be attending a different educational setting in September 2020 will be asked to re-apply for home-to-school transport. The reason for this is to ensure continued eligibility at the new setting. Applications forms will be sent out to parents/ carers by the 2nd week of May 2020
- Parents and guardians of children and young people currently using our service will be emailed in the first week of June 2020 offering them the opportunity to provide us with any changes for their child's pupil information sheet
- If the information on the current pupil information sheet is still relevant and up-to-date they will not need to submit further information to us or complete a new one
- For parents who do not have a copy of their child's current pupil information sheet we will get a copy to them in whichever way is the parent/ carers' preference

- Whilst some change in the next academic year is inevitable, our preference, wherever possible is not to change the routes, drivers and VPA's from what is currently in place and we guarantee to keep changes to a minimum and to only make changes when absolutely necessary
- Our route planning will be completed by the end of July 2020. We will therefore be informing our existing, and new parents and guardians of their driver and VPA in the last week of July 2020 at the latest
- In instances where the route, driver or VPA are changed, the transport company, including the driver and VPA will make contact with the parents and guardians early in August. The reason for this timescale is both to minimise any potential feelings of stress caused by a change of educational setting or return to school and also to ensure that the time between getting to know the new driver and VPA and returning to school is kept to a shorter period as is practical. Parents/ carers have reminded the HTST service of the crucial importance of these introductions, which are specified in the contract with firms, but have not always been adhered to in the past.

Communication with existing parents and guardians:

- We will be emailing all existing parents and guardians in the second week of May 2020 laying out the above information and timescales and inviting them to submit additional and new information for the pupil information sheet and to let us know if there are any worries or concerns with their child continuing with their current transport arrangements in the 2020/21 academic year
- We are also aware that whilst the majority of our parents and guardians use email, some do not. We will ensure that these remaining parents and guardians are contacted by our service by the close of the third week of May 2020

Children and young people who will be new to our service in September 2020:

- We are continuing to work closely with our colleagues in the SEN Team and inviting the parents and guardians of children who have just been awarded a EHCP to submit an application for Home-to-School-Transport
- Once received applications are considered at SEN/Home-to-School-Transport Panel. These take place approximately once a fortnight throughout the year but this is variable depending on number of applications
- To ensure full representation going forward on the Transport Panel, an Amaze worker who is also a parent/ carer of a child with disabilities, will be invited to join the Panel and offer advice from a parental perspective.
- The above is a continual process that takes place throughout the year thus ensuring that parents and guardians receive an outcome to their application as soon as possible and prevents a backlog of applications
- Once a decision has been made parents and guardians are informed of the decision in writing and are invited to complete a pupil information sheet

- If the application is successful we either add the child or young person to an existing route, if available and appropriate for their individual needs, or put the new route out to tender
- As with existing children and young people we will inform new parents and guardians of 2020/21 routes in the first week of August 2020 and the transport provider, including the driver and VPA, will make contact with the parent or guardian by the close of the 3rd week of August 2020
- New applications to Home-to-School-Transports received after the start of August 2020 will be prioritised in order to ensure that the process as described above is kept to or as close to the above timescales as possible

Risk Assessments

- The Home-to-School-Transport Service is currently in the process of producing up-to-date risk assessments for all the children and young people who use our service, we have employed a temporary member of staff for this purpose with a SEN background and we are also getting support from a current member of the SEN Team
- As part of our risk assessment process, we will also be considering children's compatibility on shared transport, as well as journey lengths, to ensure our children and young people are travelling in appropriate transport that fully meets their individual needs and ensures they are arriving at school ready to learn and get the very best out of their school day
- Finally, whilst we do not anticipate that this will be in place by September we will in the next month be embarking on the process of updating our Pupil-Information-Sheets. This will be a joint piece of work that will be undertaken with PACC with the intention of further tailoring journeys to the individual children and young people for example by ensuring that as well as receiving information about individual health conditions of our children and young people that transport providers are also aware of whether they like to listen to music or talk to the driver, and what their individual interests are

Covid-19

- As well as the above, Home-to-School Transport are working to a September 2020 Covid-19 contingency plan
- This plan focuses on issues that may arise if measures are still in place to control the spread of Covid-19 and will discuss control measures to ensure the smooth operation of our service in this scenario
- The HTST service is mindful of the problems with social distancing on transport and is considering measures that can mitigate risks in this respect, which will be fully discussed with parent/ carer representatives.
- The HTST service is taking steps to ensure government guidance on cleaning of vehicles is followed and is considering whether further steps need to be taken in this respect.

- The service is also making contact with a range of other LAs to keep abreast of developments nationally.
- This plan will be updated regularly as circumstances change and the way out of the crisis becomes clearer, alongside timescales.

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Communication to Parents/ Carers on HTST arrangements

7.5.2020

Dear Parents and Carers,

I hope this email finds you all well and that you and your families are staying safe during these very difficult and testing times.

I am writing today to give you an update and an overview on how the Home to School Transport (HTST) Service is dealing with the challenges we face during the COVID-19 pandemic. Also how, in the context of the crisis and the current uncertainties, we plan to organise transport when schools re-open fully.

I would like to reassure you that the safety and well-being of our children and young people on transport is always our first priority. We are committed to providing the best and most efficient service for families both now and when schools re-open fully. However, as I'm sure you can understand, there are serious challenges for HTST, just as there are for schools, in providing services during the pandemic period.

Current Arrangements

A small number of our children and young people are currently being transported to school. The following measures are being taken to ensure their safety and the continued running of our service.

We are:

- Closely following the advice and guidance being issued by Public Health England and the Government
- Sharing plans and solutions to challenges we face due to COVID-19 with our neighbouring Local Authorities.
- Checking that all our firms are following government guidance on cleaning of vehicle surfaces between passengers' journeys
- Ensuring physical distance is maintained as far as possible on transport, although you will appreciate this is sometimes not easy in the confined space of vehicles
- Continuously reviewing our practice and risk assessments in relation to journeys in the light of changing guidance
- Supporting our transport providers who feel it necessary to use Personal Protective Equipment (PPE), where physical distancing cannot be easily maintained. This includes the use as appropriate of ordinary/ plain surgical masks, disposable gloves, plastic aprons and cleaning materials While it is the responsibility of transport firms to ensure a supply of PPE for their staff, at the council we will help where we can, subject to prioritisation and availability.
- Working closely with PACC, operators and schools to reach solutions in partnership

Arrangements for September 2020

Looking forward to September, we are doing everything we can to make sure the new school year starts smoothly and efficiently in terms of transport. As is always the case at the start of a new school year, we will have many new children joining transport and some leaving.

We are supporting our transport firms financially over this period of reduced home to school journeys so they can cope with the loss of income and hopefully retain their staff. We want to help them to be ready for when the full service is needed again.

However, despite our best efforts, there may be some disruption for a temporary period due to this global crisis. We may need the support, understanding and forbearance of parents and carers to help us in making any special arrangements needed.

When schools re-open, we will have many more children needing transport. Government guidance recognises that social/ physical distancing on transport will not always be achievable, but we will do our best locally to make this possible. For a temporary period at least, we will be reducing the numbers of children on shared transport so that physical distance can be maintained wherever reasonable and practical. We will also try to source additional vehicles as physical distancing will increase the number of journeys needed. But there may be a shortage in extra vehicles and staff needed. In that case, we will work together with schools, PACC and our transport firms to make the best arrangements possible until the situation improves.

If parents and carers are able, and would prefer, to make their own arrangements to transport children temporarily over the pandemic period, we would welcome this as it could be very supportive over a challenging time. We give our absolute assurance to any parent who is willing to transport their child over this period that this would in no way affect your child or young person's eligibility or entitlement to home to school transport longer term, and that we would check with you regularly to ensure that you are still able to do this. We would also arrange mileage payments in this situation.

We are aware that this is a very unsettling and difficult time for our families. We will do everything in our power to avoid adding to the stress. Families who have transport in place will not have to re-apply for the new academic year (unless your child is moving to a new school or college when you will receive an application form from us). Additionally, we will not be asking existing parents or carers to complete new pupil information sheets. We will only ask you to update us with any new information that you would like us to record, if needed.

Lastly I would like to say that we are responding to the problems with Home to School Transport identified in the Independent Review of the service which was undertaken recently. We have started a major programme of improvements, co-produced with PACC. We will update on this shortly.

If you have any queries or concerns with regards to Home-to-School-Transport, or you would like signposting to services or agencies who may be able to assist you and your children during these challenging times, please do not hesitate to contact the Home to School Transport service straight away.

Best wishes,

Independent Review Report Action Plan (Draft)
Co-produced by PACC and Brighton and Hove City Council

Recommendations from the Independent Review into HTST

1. **Clear, consistent and urgent communication to all stakeholders (parents, carers, schools and settings etc) about stability in the Home to School Transport (HTST) arrangements from this point onwards.** September 2020 must not be a repeat of 2019. The council should acknowledge the pressure on the base budget and that significant savings are unrealistic in the near future.
2. **Rebuild trust with schools and settings, parents/carers, VCS, members and officers from other departments.** The council should consider having a SEND charter and agreed co-production policy (which includes HTST), between parents/carers and the Council, setting out clear roles, responsibilities and expectations.
3. **The HTST policy (2015) needs to be updated with an emphasis on planning and training for independent travel, including an associated budget and sustainable strategy. It should also include a personal travel budget policy developed with parent/ carers.** This should be a consistent independent travel training offer across the local authority. The team found there were some examples of good practice in children's social care. The updated policy needs to integrate with the Special Educational Needs and Disabilities strand and should be used to re-engage and seek best practice.
4. **Review the HTST processes and streamline them.** After initial agreement that travel arrangements are required, the council should remove the requirement for parents to complete transport requests for each year and consider introduction of a system as part of the ECHCP annual review to discuss and review travel. The annual review paperwork should be revised to ensure there is clear discussion about travel requirements, supporting the planning and training needed for independence

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and preparation for adulthood. The pupil information sheets, risk information, annual review and eligibility documents could be combined into single travel plan to save duplication and aid clarity.

5. **The SEND team and HTST team must work together to share more information, reducing the burden on parents to repeatedly provide the same information.** Operational managers across departments need to work collaboratively to strengthen relationships between HTST and SEND. The newly strengthened Directorate Team need to work together more closely to encourage and facilitate this.
6. **The Council should ensure there is standardised and consistent training and performance expectations of drivers and VPAs with monitoring.** Drivers and VPAs should complete comprehensive training to ensure that they meet the needs of each child or young person for whom they are responsible. Training should include at least basic first aid and disability awareness. In addition, identification badges and high visibility jackets need to be worn consistently by drivers and vehicle passenger assistants.
7. **Review governance arrangements for projects and programmes so that all significant change projects go to the Modernisation Board.** The reviews should include simplifying governance arrangements, ensuring clear lines of accountability and decision-making with a clear audit trail.
8. **Programme management needs to be strengthened to ensure that any significant changes to Council services are based on a full business case, that there are realistic timelines and clear lines of accountability.** The Council needs to allow adequate time to undertake transformational change in a service. Business cases should be used for significant change and savings, as well as spending proposals.
9. **More support and oversight are needed from senior managers when significant changes are being made to council services.** Senior managers should also place more value on the professional advice of specialists within the Council, such as procurement, legal, communications and health and safety.

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- 10. The council should consider strengthening contract management going forward and ensuring all contracts with suppliers of HTST are signed and returned before a service starts.** The council cannot continue to rely on implied terms and conditions for the remaining contractors who have not signed contracts.

Success Criteria for the Action Plan

By 31 October 2020:

1. Parent/carer satisfaction via survey shows at least 80% trust and confidence in the service
2. New 'tell it once' online form for parent/carers in use, combining application, pupil information and risk assessment
3. Service response times to communications with and from parent/carers are met at least 90% of the time
4. 100% of new transport staff have undertaken training as appropriate in relation to safeguarding and SEND awareness
5. 100% of all Transport Panels have a trained Amaze parent/carer worker present to represent parents' viewpoint
6. 100% of all interviews for staff in HTST are conducted with a representative of PACC on the interview panel
7. 95% of all spot checks and compliance monitoring passed and any breaches corrected within 24 hours
8. Long term leadership and capacity of HTST team established.

By 31 March 2021

9. A quality independent travel training option is available to all families for whom independent travel is an option
10. A fully revised and updated HTST policy is published, following co-production between the council and PACC and Amaze.
11. 100% of existing transport staff have booked onto refresher training and extended training as appropriate.
12. Further survey of parental satisfaction indicates 85%+ trust and confidence in the service.
13. All recommendations from independent review have been completed.

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Review and evaluation arrangements

Green* = very good progress **Green** = good progress **Amber** = need to accelerate **Red** = progress weak

- This plan to be reviewed at each monthly meeting of the HTST Governance Board
- Progress reports to CYPS Committee in June 2020, November 2020 and a final report on March 2021

Action Plan

No.	Recommendation	Actions	Lead(s)	Completion date	RAG
1.	Establish clear consistent communication with all stakeholders	1 Agree and publish a co-production policy 2. Ensure all policy is co-produced with PACC, including consultation with PACC 3. Establish regular updates with parents and carers via the PACC and Amaze websites and via HTST service email links	RD/DB	June 2020	
2.	Re-build trust and confident between the council and families and all partners, including schools, VCS and transport providers	1. Establish regular partnership meetings with PACC, including PACC Connects and with transport operators, schools and other stakeholders (Governance Board, PACC Connects, termly meetings with PACC reps, schools and transport providers) 2. Establish principles of co-production in all new and revised policy and operational practice	RD RD/ DB	May 2020	

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No.	Recommendation	Actions	Lead(s)	Completion date	RAG
		<p>3.All transport panels to have a trained Amaze parent/carer worker to represent parental viewpoint</p> <p>4. All interview panels for HTST staff to have a PACC representative</p> <p>5. Team resources and capacity to be reviewed and increased where necessary, so there is adequate leadership to drive and embed improvements, and sufficient staff to ensure response times can be met, including at times of peak demand</p> <p>6. Establish yearly parental surveys and intermediate means for parents to feedback on proposed changes and specific issues</p>	<p>RG</p> <p>RG</p> <p>RD</p> <p>RD/ FE</p>	<p>Sept 2020</p> <p>Sept/Oct annually</p>	
3., 4 and 5	<p>Update and improve HTST policy</p> <p>Review all HTS transport processes and streamline in conjunction with SEND team and families</p>	<p>1.Establish a team of stakeholders across PACC/Amaze, schools, and the SEND and HTST teams to co-produce a revised HTST policy</p> <p>2. Create/ review policies/ protocols on:</p> <ul style="list-style-type: none"> a. Independent travel training b. Personal payments to families who wish for them c. Reassurance for families on contractual compliance 	<p>RD</p> <p>HTST/ PACC</p>	<p>October 2020</p> <p>March 2021</p>	

Draft action plan to be co-produced by council and PACC

No.	Recommendation	Actions	Lead(s)	Completion date	RAG
		<p>d. Application process e. Pupil information transfer and risk assessment f. Ratios of VPAs g. Response to medical needs h. Final agreement on transfer of pupils from vehicles in and out of school, including resolution of insurance issues</p> <p>Ensure strong links between HTST and SEND teams and link HTST eligibility and needs assessment to the EHC plan annual review process</p>	SEN caseworker	October 2020	
6. and 10.	Enforce performance expectations of transport providers and staff, including with training	<p>Establish and resource:</p> <ul style="list-style-type: none"> • Termly contract reviews • Monthly compliance checks at operators' offices • Weekly 'spot checks' on school sites • Specific checks on completion of training by drivers and VPAs • Robust protocols for any contractual breaches 	RD/ RG	Oct 2020	
7.	Ensure robust governance arrangements	<p>1. Establish the governance structure</p> <p>2. Ensure links between the various key groups – CYPs Committee, Members' Policy Panel and HTST Governance Board are secure</p> <p>3. Establish a Governance Board with agreed terms of reference</p>	RD/ JL	April 2020	

Draft action plan to be co-produced by council and PACC

No.	Recommendation	Actions	Lead(s)	Completion date	RAG
8. and 9.	Strengthen programme management processes and oversight	<p>1.ensure HTST is registered as a corporate risk with key actions and mitigations, as well as regular reviews</p> <p>2. establish links to the corporate modernisation board in terms of any costs associated with the development of the service and review of resources needed to secure improvements</p> <p>3.ensure adequate support from key central services</p>	RD/JL	April 2020	

DRAFT

DRAFT FOR CONSULTATION

Home to School Transport: Special Arrangements over the COVID-19 crisis period

Sent 7.5.20 with deadline for consultation responses by Friday 22 May

Dear Transport Operators

This email sets out local guidance, additional to national guidance, for HTST in relation to:

- use of PPE
- social distancing
- cleaning of vehicles on HTST.

The guidance draws upon:

- government and Public Health guidance
- practice in other Local Authorities where known
- information from our local transport providers
- wider council guidance on the rationale for use of PPE
- risk assessments
- consultation with key stakeholders (families, schools, transport operators)

Government guidance does not currently recommend the use of PPE outside of care settings. This means that Government guidance does not require the use of PPE on transport or in schools. Recommendations for transport providers are in the guidance linked below:

<https://www.gov.uk/government/publications/covid-19-guidance-for-staff-in-the-transport-sector/covid-19-guidance-for-staff-in-the-transport-sector>

We expect our transport providers to have made their own risk assessment in relation to COVID-19, based on the particular routes covered and the needs of the children on those routes, and to take action accordingly. We are aware that many providers are already using PPE and understand the rationale and reasons for this.

The advice and recommendations from the council for HTST, on the basis of the council's analysis, are as follows:

Personal Protective Equipment (PPE) on Journeys

Where social distancing is reasonably achievable on HTST and where no physical contact need normally be made with children and young people by drivers and VPAs, we are not recommending the routine use of PPE. However, we understand that local providers may wish to use PPE on the basis of their own risk assessment in specific circumstances.

Where social distancing on HTST is not routinely possible, we are supportive of transport providers who are using, or wish to use disposable gloves and ordinary/ plain surgical masks as a precautionary measure. The reasons we have come to this conclusion are as follows:

- in Brighton and Hove, almost all our children and young people on HTST have severe and complex special needs and disabilities and are therefore particularly vulnerable - many have underlying health conditions, so need individual risk assessments and more protection than the general public on transport;
<https://www.gov.uk/government/publications/coronavirus-covid-19-send-risk-assessment-guidance/coronavirus-covid-19-send-risk-assessment-guidance>

- drivers and VPAs will frequently need to support children on and off transport and into school via physical contact, as well as handle their personal equipment such as wheelchairs and frames and this increases the risk of cross-contamination;
- there is a risk of transfer of bodily fluid for some children and young people

Where there is routinely bodily contact and/or a significant risk of transfer of bodily fluid, the use of a disposable plastic apron is a sensible precaution also, but we believe this would be an exceptional need, determined by a provider's own risk assessment.

We are not recommending the use of PPE for children and young people on transport. Exceptional cases should be raised with the HTST team for discussion of the best way to balance risks to safety with meeting the special needs and disabilities of the child or young person, and their emotional wellbeing. Partnership with families will be essential to effective decision-making.

The acquisition of appropriate PPE is the responsibility of transport providers and not of the council. However the council acknowledges that PPE supplies can be difficult to acquire at the current time. In that context, providers who have exhausted all avenues for acquiring PPE can apply to the council for support on the form attached, which should be returned to Rob Glaister, interim team manager of the HTST service. The council will support suppliers as far as possible, but only if supplies cannot be accessed elsewhere, and subject to prioritisation and available stocks. There is no guarantee that the council can provide PPE and this should not be a routine demand when other avenues for accessing supplies are available.

PPE is only one effective measure within a package of administrative, environmental and management controls. This includes maintaining social distancing where practicable, monitoring staff and clients for coronavirus symptoms, and applying correct waste management and cleaning regimes. Where PPE is used, it is important to apply internationally recognised principles i.e. all PPE that is provided to help manage Coronavirus hazards should be:

- Provided and worn only in relation to an associated task risk assessment;
- Compliant with the relevant BS/EN standards (European technical standards as adopted in the UK) and used in accordance with manufacturers' instructions;
- Used after relevant staff training and fit testing where relevant (see resources below);
- Located close to the point of use;
- Stored to prevent contamination in a clean/dry area until required for use (expiry dates must be adhered to);
- Changed immediately following completion of a procedure, task, shift or session (as directed by the risk assessment); and
- Disposed of after use by double bagging waste in domestic waste bags and disposing after 72hrs into the appropriate waste stream.

Transport services will still need to follow the general Coronavirus avoidance guidance, even when using PPE. As such, staff will need to:

- Avoid close contact with others where possible i.e. within 2 metres
- Resist the urge to touch their face/mouth/nose/eyes
- Report any COVID-19 symptoms early, a new continuous cough or a fever, however, mild
- Cough or sneeze into a disposable tissue
- Regularly wash hands thoroughly with soap and water for at least 20 seconds. Where facilities are not available, hand-wipes may be used.

- Only use sanitiser/hand gels when hands are visibly clean.
- Avoid touching surfaces that may have been contaminated by others and clean such areas with an approved disinfectant frequently.

Social Distancing

The HTST service currently arranges transport for children and young people to allow for recommended social distancing as far as possible. As schools re-open fully, the HTST service will continue to make exceptional arrangements, as far as reasonable and practical, to maintain social distancing.

Government guidance acknowledges that social distancing will not always be possible on transport, and where this is problematic, the guidance suggests avoiding face to face contact as far as possible and ensuring good ventilation. The latest guidance (1st May 2020) on social distancing is below:

<https://www.gov.uk/government/publications/full-guidance-on-staying-at-home-and-away-from-others/full-guidance-on-staying-at-home-and-away-from-others#eel-decline>

In order to preserve social distancing to the maximum degree possible while national policy is in force, the HTST service will, wherever possible and practical, limit the numbers of children and staff on vehicles as follows:

- a maximum of 2 students in a saloon or similar sized taxi, or 1 child and 1 VPA
- a maximum of 2 children and 1 VPA in an 8 seater vehicle
- a maximum of 4 children or 3 children and 1 VPA in in a larger public service vehicle (it may be possible to increase that number, subject to risk assessment, on the largest vehicles)

This will create inevitable challenges when more children and young people return to school and college, not least in terms of supply of extra vehicles needed and it is acknowledged that some disruption to normal arrangements will occur for a temporary period. However the safety of children and staff, in line with national guidance, is the paramount concern.

When schools re-open, there may need to be some staggering of journey times which will need to be arranged in partnership with schools, colleges and families.

This exceptional and challenging situation will require considerable goodwill, flexibility and partnership working over this temporary period.

The council is also supportive of operators who are installing, or investigating the installation of, screens between the front and back of vehicles or between the driver and front passenger seats with certain provisos. This potentially provides a protective barrier and could enable more passengers to be carried safely but such installation needs to be subject to professional and safe installation and maintenance, appropriate risk assessments in relation to passengers carried, and any considerations in relation to licensing and insurance cover.

Cleaning of vehicles

The council requires all transport operators and staff to follow national guidance, as previously circulated, on the cleaning of vehicles between passengers and to be meticulous about frequently cleaning and disinfecting objects and surfaces using the appropriate cleaning products. Please see guidance below:

<https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings>

The council prohibits the transport of passengers with confirmed COVID-19 on vehicles used for HTST under any circumstances. If someone becomes unwell while on their journey with a new continuous cough or a high temperature, they must be taken home.

If a passenger either on a school run or via another route has suspected COVID-19 symptoms, operators must follow national guidelines to carry out a very thorough cleaning of the vehicle concerned, using apron, mask and gloves and leave at least a 72 hour interval before next usage.

Where cleaning products and equipment cannot be accessed elsewhere, providers may be able to access supplies from the council via the attached form, although this is not guaranteed.