SEND Home to School Transport Follow Up RB13-2023

INTERNAL AUDIT REPORT

Release: DRAFT

Date: 13th October 2023

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Follow Up Summary

Background Information

The Council has a statutory duty to provide home to school transport services to facilitate attendance at school for eligible students. This is referred to as the 'Home to School Transport' (HTST).

Internal Audit were commissioned by the Corporate Officers of Kent County Council (KCC) to perform a Lessons Learnt Review on the Special Educational Needs and Disabilities (SEND) HTST service, following issues with the re-tendering of the SEND transport services in February 2022, which resulted in some students not having access to transport following the February 2022 half-term holiday.

It was agreed with the Governance and Audit Committee in May 2023 that a follow up review would be completed on the original Lessons Learnt Review and the focus of this follow up would be on the following workstreams:

1. Impact upon families and children
2. Project planning and change management arrangements
3. Cross-Directorate governance and communication between Childrens, Young Persons & Education (CYPE) and Growth, Environment & Transport (GET)

The aim of this follow up was to provide assurance to key stakeholders on the adequacy, effectiveness and progress of implementing the agreed actions arising from the three workstreams highlighted above.

It has been agreed that a coordinated joint response will be provided to the draft report by CYPE and GET.

The findings of this Follow-up review must be reported to the November 2023 Governance and Audit Committee.

Follow Up Conclusion

The follow up review has established that progress is being made to implement the agreed management actions from the original SEND HTST Lessons Learnt Review in relation to the following work streams:

1. Impact upon families
5. Project and change management
10. Cross-directorate governance and communication between CYPE and GET

A full summary of implementation of Lessons Learnt is set out below:

- 5/17 (29%) management actions have been fully implemented.
- 11/17 (65%) management actions are in-progress or further embedding / ongoing.
- 1/17 (6%) lessons learnt is no longer considered relevant.

Whilst some of the Lessons Learnt are still in progress, or being embedded into an ongoing arrangement, the follow up has established that there are improved arrangements in relation to resourcing, communication, collaborative working, reporting and oversight. This has enabled the SEND HTST service to return to business-as-usual, with good outcomes in terms of the provision of transport for September 2023.

A summary of the follow up outcomes is provided below, along with some suggested improvements to further enhance delivery and oversight of the SEND HTST service:

Status	1 – Impact on Families	5 – Project & Change Management	10 – Cross Directorate, Governance & Communication	Totals
Agreed Management Actions	4	6	7	17
Complete	1	3	1	5
In Progress	3	2	6	11
No Longer Relevant	0	1	0	1
Total Implemented	**25%**	**50%**	**14%**	**29%**

Impact Upon Families and Children				
Lessons Learnt		**Current Status**	**Summary of Follow up Findings**	**Management Response, Owner & Implementation Date**
1.1	Parent / Carer feedback should be used to inform management actions	**Complete**	There has been engagement and collaboration with parents and carers in response to the original SEND HTST retendering exercise and wider transport initiatives.	N/A
1.2	KCC should work together with Kent PACT, families and schools to restore trust and confidence in the Council.	**In Progress**	There has been a large amount of formalised activity to proactively communicate, engage and collaborate with key stakeholders in relation to SEND HTST. This will be an ongoing programme across all SEND programmes.	
1.3	For future projects, an impact (quantitative and qualitative) assessment to inform decision-making should be undertaken and reported to Members and Management	**In Progress**	An impact assessment on school attendance was completed after the initial SEND HTST retendering incident. The report to Cabinet concluded that there was no adverse impact reported on student's educational attainment. There has been no retrospective impact assessment completed on the original HTST retendering exercise in terms of DPIA, EQIA or transport journey times. An analysis of SEND HTST journey times is planned when the new route planning software is procured / implemented. An EQIA was completed on the 4-16 Home to School Transport Policy 2024-25.	
1.4	A range of mechanisms, including SitReps, to monitor and track pupils transport arrangements be	**In Progress**	There is a wide range of mechanisms in place to monitor and track delivery of the SEND HTST service. During the follow-up review, improvements have been suggested to enhance transparency on the fortnightly SitReps that have been	

<table>
<tr><td></td><td>established, deployed and maintained</td><td></td><td>introduced and increase transparency of tracking and monitoring of SEND HTST applications across both GET Client Transport and CYPE Transport Eligibility.

A large amount of student personal data is being shared between GET Client Transport and CYPE Transport Eligibility via email. Advice has been provided how to transfer student personal data more securely.

The transport information forms (TIF) received by GET Client Transport regularly contain data quality issues / errors, which can lead to processing delays.</td><td></td></tr>
<tr><td>N/A</td><td>SEND HTST Data</td><td colspan="2">Since the original SEND HTST review, it has been confirmed that the numbers of students impacted by the HTST retendering exercise was as follows:

<table>
<tr><th>Date</th><th>Number of students not on transport</th><th>Percentage of total students</th></tr>
<tr><td>Total number of students on HTST</td><td colspan="2">5,455</td></tr>
<tr><td>14 February 2022</td><td>1,390</td><td>25%</td></tr>
<tr><td>21 February 2022</td><td>300</td><td>5%</td></tr>
<tr><td>23 February 2022</td><td>170</td><td>3%</td></tr>
<tr><td>25 February 2022</td><td>100</td><td>2%</td></tr>
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Records reviewed during the follow up indicated that SEND HTST service resumed business as usual processing from week commencing 4 April 2022.</td><td>N/A</td></tr>
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During the follow up, a review of the most recent SitRep identified the following:

SitRep (14 September 2023)	
Total number of eligible students	7,044
Number of students on hired transport	5,992
Total transport requests received since 1 April 2023	2,265
Total transport requests completed since 1 April 2023	2,062
Number of transport requests pending	203

The GET Client Transport Team are now fulfilling all HTST applications within 4 weeks of receipt.

The number of students on hired transport has increased by 537 since February 2022. This review has not examined the increase in numbers in detail as this is within the scope of the Council's SEND Transformation Programme and Scrutiny's Home to School Transport Short Focused Inquiry

At the time of follow up, there was only one complaint in progress in relation to the SEND HTST service.

	Further Management Actions Recommended by Internal Audit	Management Response, Owner & Implementation Date
1	To complete journey analysis time as planned when new route planning system is in place and report outcomes to key stakeholders	
2	Update SitRep reports to improve transparency on processing of transport applications across both CYPE Transport Eligibility and GET Client Transport	
3	To reduce the number of data quality issues reported on the Transport Information Forms	
4	To review how student personal data is shared between GET Client Transport and CYPE Transport Eligibility to optimise data security	

5. Project Planning and Change Management Arrangements

	Lessons Learnt	Current Status	Summary of Follow Up Findings	Management Response, Owner & Implementation Date
5.1	The Project Management Office (PMO) must be utilised for significant projects to ensure that adequate project planning, governance and oversight are undertaken	**CYPE In Progress**	CYPE do not currently have a dedicated project management resource. The lack of a dedicated project management resource within CYPE is considered to be a risk. However, a number of the CYPE priority projects are part of the Strategic Reset Programme, which does have available project management support. There is oversight of CYPE projects at the respective project boards.	
		GET Complete	GET have strong project management arrangements, resources and expertise in place, including a dedicated PMO. GET projects are tracked and monitored as part of routine project board meetings.	N/A
5.2	There should be consideration of a centralised PMO function for the whole of the Council as a means of ensuring consistency in the application of project management approaches and principles	**N/A**	There are no current plans across the Council to create a centralised PMO function.	N/A

5.3	There are a wide range of guidance and tools readily available to support officers in managing a project and these must be utilised where experience from the PMO is not utilised	**Complete**	All officers interviewed during the follow up review demonstrated a good understanding of the Council's project management approach and awareness of and willingness to utilise available tools and resources outside of their directorate's project management arrangements.	N/A
5.4	A DPIA must be undertaken for the procured system to understand whether there are any risks that the Data Protection Officer (DPO) needs to be aware of	**In Progress**	There was no DPIA completed in advance of the original SEND HTST retendering exercise in February 2022 and a DPIA has not been completed retrospectively. The Public Transport Manager and Assistant Director of Fair Access and (Interim) SEND Processes presented a business case to the Strategic Reset Programme (SRP) Board in May 2023, to procure an automated route planning software application. This business case did not include a DPIA, which was a contributing factor in the business case being rejected by the SRP Board. The follow up review has confirmed that CYPE and GET have the resources and expertise to complete DPIA's, with evidence that DPIA's are completed on other initiatives. Officer roles and responsibilities in respect of preparing DPIA's for future SEND HTST need to be clarified to avoid potential issues in the future.	

5.5	Risks for the project must be continually assessed from the outset of the project to full implementation which can be easily undertaken as part of development of a project risk register	**Complete**	There are strong risk management arrangements in place in relation to the SEND HTST service, including the maintenance of a comprehensive risk register and regular review and reporting to key stakeholders.	N/A

	Further Management Action Recommended by Internal Audit	**Management Response, Owner & Implementation Date**
5	CYPE to review project management resources available	
6	To complete a DPIA on the procurement of the new route planning software application as planned	
7	Roles and responsibilities on the production of DPIA's in relation to future SEND HTST activities (including the planned software application procurement) to be formally clarified	

10. Cross-Directorate Governance Arrangements between CYPE and GET				
Lessons Learnt		**Current Status**	**Summary of Follow Up Findings**	**Management Response, Owner & Implementation Date**
10.1	Recognition of cross-directorate projects via the performance of an impact assessment in the early planning stages	**In Progress**	There has been good progress between CYPE and GET to identify numerous cross-directorate projects at the earliest interval. Improvements could be made to the Council's annual business planning process to identify and link cross-directorate initiatives / activities at the start of each financial year.	
10.2	A formal SLA between CYPE and GET, must be introduced including meaningful performance measures, which are subject to contract monitoring arrangements and robust escalation procedures where needed	**In Progress**	GET prepared the initial draft SLA in November/December 2022. A decision has been made to create a Memorandum of Understanding (MoU) in relation to delivery of the SEND HTST service, across CYPE Transport Eligibility and GET Client Transport. Despite the time lag of 18-months, the draft MoU is currently still being progressed by Commissioning and is due to be in place by the end of the financial year. In the meantime, the risks of not having a formal MoU in place are being effectively mitigated by good working relationships and regular communication between relevant officers. There is a clear consensus amongst relevant officers about what the MoU needs to include and the benefits of having this in place.	

10.3	Officer and Member accountability, roles and responsibilities on SEND Transport and future re-tendering exercises to be clearly defined	**In Progress**	A significant amount of work has been completed to agree and define officer and Member accountabilities, roles and responsibilities in relation to SEND HTST. Furthermore, a number of changes have occurred with key officer and Members involved in SEND HTST to provide more resource stability. Further work is needed to clarify the role and responsibility for preparing DPIA's on SEND HTST initiatives – see **5.4 Project Management.**	
10.4	To improve and formalise the communication between CYPE, GET and key stakeholders	**In Progress**	Communication between CYPE, GET and key stakeholders has vastly improved. The introduction of the MoU will formalise these communication arrangements. The HTST Board provides an effective and formal setting for all SEND HTST issues to be discussed. However, the minutes of the HTST Board meetings do not evidence that actions from the previous meeting are followed up / revisited.	
10.5	Future SEND Transport re-tendering exercises to be managed as a cross-directorate initiative and in accordance with the Council's Constitution and project management methodology	**Complete**	A decision has been made not to complete a whole market SEND HTST retendering exercise again in the future. An agreed retendering strategy has been published as part of the as part of the 4-16 Home to School Transport Policy 2024-25.	N/A

10.6	To review communication of transport requirements between CYPE and GET, including the transport information forms and the transition year 6 to year 7	**In Progress**	Data analysis identified that there are delays in the Transport Information Forms (TIFs) being received by CYPE Transport Eligibility, assessed and then forwarded to GET Client Transport Team. This is likely to be due to transport applications being prioritised according to the date transport is needed by. However, there was no evidence during the follow up that there is routine tracking and monitoring of transport applications from initial receipt by CYPE Transport Eligibility to transport being arranged by GET Client Transport. The Transport Information Forms (TIFs) prepared and sent to the Client Transport Team regularly include data quality issues / errors, which can cause delays in transport being arranged.	
10.7	CYPE and GET to operate collaboratively in order to deliver the Council's statutory duty for SEND Transport	**In Progress**	CYPE and GET are working effectively together in collaboration to deliver the Council's statutory duty in respect of SEND HTST. This is evidenced by the monthly HTST Monitoring Board meetings, fortnightly in-office working between GET Client Transport and CYPE Transport Eligibility to coordinate current bookings, SitReps and monthly client liaison meetings between GET & CYPE.	

			See 10.4 above. The introduction of the MoU will formalise this collaboration.	

Further Management Action Recommended by Internal Audit		**Management Response, Owner & Implementation Date**
8	To clearly link cross-directorate activities / initiatives on the Council's annual business plan	
9	To implement the Memorandum of Understanding as planned	
10	Ensuring actions from HTST Board meetings are followed up / revisited at the start of the next available meeting	
11	To introduce monitoring, tracking and reporting of SEND HTST transport applications across both CYPE Transport Eligibility and GET Client Transport	
12	Include budget monitoring reports as a standing agenda item on the SEND HTST Board meetings	