

CONSULTATION FEEDBACK DRAFT RESPONSES

The formal responses to the consultation have been independently analysed. The table below draws out the themes from the consultation feedback as identified by the independent analysis, ordered by frequency of response with the most repeated themes at the top. Also provided in the table below is the draft response to the feedback themes, reflecting officers' consideration and assessment of each theme.

The first section relates to feedback on proposals to provide a Personal Transport Budget to most learners who qualify for additional support

The second section relates to feedback on the expectation that students aged 19+ would initially apply for a discretionary bursary from their learning provider to facilitate travel before seeking support from Kent County Council (KCC). Where KCC decides to provide support beyond that provided by the learning provider, in most instances this would be in the form of a mileage payment.

The third section relates to additional general feedback respondents provided through via the consultation.

The draft KCC responses are provided for consideration by the Cabinet Member.

Section 1: Provision of a Personal Transport Budget to most learners who qualify for additional support

Consultation feedback theme	Draft KCC response
Parents / carers would be affected / change working hours / give up work / can't be in two places at once	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age. Additionally the Equality Impact Assessment acknowledges that families may need to change their routines to incorporate additional or longer journeys, and that this may negatively impact work or other commitments. The Equality Impact Assessment explains a number of ways in which the impacts of the policy would be mitigated.</p> <p>There is no legal entitlement to attend a specific school without first considering how one might attend. It is already common practice in Kent for mainstream pupils and their families to have to manage the legal requirement to remain in education or training, without direct support from KCC to attend any learning establishment of their preference, although we acknowledge that this may be more complex or difficult in the case of individuals with additional needs. KCC will continue to provide additional</p>

	<p>support to these individuals. The proposed policy allows for alternatives to PTB considered in exceptional circumstances, in addition to an independent appeals process that allows applications to make direct requests to Members of KCC's Transport Regulation Committee Appeals Panel</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
Children / young people cannot access public transport / travel independently	<p>KCC's proposed scheme includes the opportunity for bespoke travel training, to support those learners who are able to develop the necessary skills to make use of public transport.</p> <p>Where independent travel is not possible, KCC's Personal Transport Budget offer does not limit use of provided funds to specific types of transport. In nearly all cases, learners would receive higher than the usual mileage rate of 45 pence per mile and exceptional circumstances and appeals processes remain available to allow individual circumstances to be considered. Similarly, funds can be used to engage other third parties to support an individual learners travel needs.</p>
Makes education inaccessible / young people will miss out / changes will affect attendance	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age and that, for some individuals, attendance may be impacted.</p> <p>The Equality Impact Assessment explains a number of ways in which the impacts of the policy would be mitigated. However, as a result of the feedback received during the consultation, KCC have undertaken a more detailed analysis of existing pupil travel patterns. The Cabinet report and EqIA have been updated to provide a more granular analysis of the likely impact on those who have to travel further, as they are more likely to be negatively affected. This analysis identified that adult learners are more likely to be negatively impacted by these changes than learners of sixth form age, as they are more likely to have more</p>

	<p>complex transport arrangements to begin with. This analysis does also suggest that in most instances, learners who received a smaller level of support after historic policy changes continued to remain in education, although a small minority did cease to engage.</p> <p>However, for the reasons outlined in the remainder of this analysis, it is not suggests that any further changes should be made to the proposed policy.</p> <p>There is no legal entitlement to attend a specific school without first considering how one might attend. It is already common practice in Kent for mainstream pupils and their families to have to manage the legal requirement to remain in education or training, without direct support from KCC to attend any learning establishment of their preference, although we acknowledge that this may be more complex or difficult in the case of individuals with additional needs. KCC will continue to provide additional support to these individuals. The proposed policy allows for alternatives to PTB considered in exceptional circumstances, in addition to an independent appeals process that allows applications to make direct requests to Members of KCC's Transport Regulation Committee Appeals Panel</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
<p>Families cannot afford to pay for transport / Personal Transport Budget will not cover costs</p>	<p>While KCC has historically provided a high level of transport support for some learners of sixth form age and adult learners, (particularly those with SEND and or EHCPs) there is no default legal entitlement to free school transport.</p> <p>The consultation outlined the reasons why KCC does not consider it possible to continue to provide historic levels of support. We acknowledge that the support provided by KCC would be lower than the average cost of transport currently provided, which means that learners would</p>

	<p>be unable to replicated current arrangements solely with the PTB. We acknowledge that this may impact families financially, and that in some cases the impacts may be significant. However, learners with higher levels of need will continue to receive a greater level of support than others if proposals are implemented. In exceptional circumstances, KCC will also consider making additional arrangements.</p>
<p>All education transport should be provided / funded by KCC</p>	<p>While national legislation requires learners of sixth form age to remain in education or training, statutory entitlement to free school transport is not extended to these same learners. Councils are not provided dedicated funds to support transport for these learners. This means that national legislation and funding does not support an expectation that all learners should be provided fully funded transport support. KCC has to assess what it is necessary to provide and must balance a range of factors and considerations in doing so.</p>
<p>Special schools are often further away / are few & far between / little choice where to send young people</p>	<p>The proposed PTB scheme provides increased levels of funding to pupils that need to travel further to their place of learning.</p> <p>While the pre-consultation EqlA identified that this impact was more likely to occur if proposals were implemented, as a result of the feedback received during the consultation, KCC have undertaken a more detailed analysis of existing pupil travel patterns, allowing a more granular analysis of the likely impact on those who have to travel further, as they are more likely to be negatively affected.</p> <p>This analysis suggests that the majority of learners travel fewer than 15 miles to their place of learning, but that more adult learners travel further than learners of sixth form age.</p> <p>However, balancing these impacts with the aims and objectives of the proposals, it is not considered that any further changes should be made to the proposed policy.</p>
<p>Concerns with assessment / monitoring criteria / what are exceptional circumstances?</p>	<p>Exceptional circumstances, by their nature, are not subject to categorisation or pre-defined criteria. KCC will consider requests for exceptional consideration on a case-by-case basis. The proposed policy makes clear that it is expected that the vast majority of pupils will be provided a</p>

	<p>Personal Transport Budget where they are identified as qualifying for increased levels of support.</p> <p>All policy related decisions are subject to independent Member appeal and Local Government and Social Care oversight.</p>
Young person suffers with anxiety / mental health / changes could exacerbate issues / need a routine	<p>The Equality Impact Assessment associated with this consultation acknowledges that affected learners are more likely to present challenges related to anxiety, mental health and/or difficulties in managing change.</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families a longer period to prepare.</p>
Unfair / discriminatory for families / those with SEND	<p>The proposals would continue to provide learners with SEND with a significantly higher level of support than those without. Most learners of sixth form age are provided no direct support by KCC to engage in ongoing education or training. In exceptional cases KCC will also consider making alternative arrangements. KCC is required to balance a number of considerations in deciding what support it is necessary to provide. As explained in the Equality Impact Assessment, KCC does not consider that the proposals are discriminatory.</p>
Young people are entitled to an education	<p>While national legislation requires learners of sixth form age to remain in education or training, statutory entitlement to free school transport is not extended to these same learners. Councils are not provided dedicated funds to support transport for these learners.</p> <p>The proposals continue to provide elevated levels of support to learners with higher levels of need, ensuring all are supported to remain in education.</p>
Safety issues / safeguarding / vulnerable at risk when travelling	<p>Proposals include access to independent travel training for learners, to help them navigate public based transport options. However, KCC's Personal Transport Budget offer does not limit use of provided funds to specific types of transport. Funds can be used to engage other third parties to support an individual learner's travel needs. Registered Transport Employers are required by law to ensure that employees</p>

	<p>complete an Enhanced DBS check, ensuring safe engagement with the public. The policy does allow for exceptional circumstances to be considered, alongside Member based appeals, which could allow for individual mitigations to help overcome these difficulties.</p> <p>The pre-consultation EqIA identified that pupils may have more limited transport arrangements as a result of increased complexity, but has been updated following this feedback to reflect that additional factors such as this may also limit education opportunities.</p> <p>However, balancing these potential impacts with the aims and objectives of the proposals, it is not suggests that any further changes should be made to the proposed policy.</p>
Difficulty in arranging alternative transport	<p>Personal Transport Budget guidance provides support to help learners and their families to consider alternative ways to organise transport.</p> <p>KCC also provides online tools that support learners and their families when considering school travel planning.</p>
KCC has more resources / better at co-ordinating / optimising vehicle capacity / routes	<p>While KCC has developed strong working practices that support the delivery of transport at a large scale, it is not provided direct funding to provide school transport to learners of sixth form age and there is no statutory entitlement to free transport support. While KCC has provided a higher level of support to this point, the consultation outlines why it has been necessary to reconsider what future level of support may be appropriate.</p> <p>Following consultation feedback, the proposed policy now includes the option for schools to work in conjunction with KCC to provide transport to their own learners. KCC will share experience and expertise to ensure these arrangements are robust.</p>
Public transport is poor / poor availability / timings / long journey times / expensive	<p>KCC does not run the public bus network, but many learners of sixth form age elect to use it to support their transport needs. However, KCC's Personal Transport Budget offer does not limit use of provided funds to specific types of transport. In nearly all cases, learners would receive higher than the usual mileage rate of 45 pence per mile and appeals and exceptional circumstances processes remain available to allow individual</p>

	<p>circumstances to be considered. Similarly, funds can be used to engage other third parties to support an individual learner's travel needs.</p>
<p>Cannot apply a one-size fits all approach / all young people are different / have different needs</p>	<p>The proposed policy statement provides a range of transport support options that are targeted to ensure support for learners with a full spectrum of need. This includes:</p> <ul style="list-style-type: none"> • Direction to provider led 16 to 19 Bursary Fund • Subsidised travel cards for Young people who are not in education, employment or training (NEET) • Active Travel Strategy • Vacant Seat Payment Scheme • Care to Learn • Alternative Support for those learners requiring additional assistance <p>In addition, KCC's Personal Transport Budget offer does not limit use of provided funds to specific types of transport. Funds can be used to engage other third parties to support an individual learner's travel needs.</p> <p>Where exceptional need is identified, the proposed policy allows for consideration of a KCC provided vehicle. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>
<p>Receiving a Personal Transport Budget should be a choice rather than a mandate</p>	<p>KCC's previous transport policy statement allowed learners to elect to receive a PTB where it was preferable and financially viable to the council. Nearly 1 in 6 SEN learners make use of a PTB as a result. Unfortunately, the consultation outlines why it has been necessary to consider changing this to a mandatory scheme.</p>
<p>No access to own transport / cannot drive</p>	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age.</p> <p>There is no legal entitlement to attend a specific school without first considering how one might attend. It is already common practice in Kent for mainstream pupils and their families to have to manage the legal requirement to remain in education or</p>

	<p>training, without direct support from KCC to attend any learning establishment of their preference.</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
Agree with Personal Transport Budget / good idea	KCC is very proud of its PTB scheme, which currently supports around 1500 learners to successfully gain access to their place of learning, The proposals would ensure that learners with higher need continue to receive an enhanced level of support from KCC.
Legally obligated to be in education until 19	While national legislation requires learners of sixth form age to remain in education or training, statutory entitlement to free school transport is not extended to these same learners. Councils are not provided dedicated funds to support transport for these learners. This means that national legislation and funding does not support an expectation that all learners should be provided fully funded transport support. KCC has to assess what it is necessary to provide and must balance a range of factors and considerations in doing so.
PTB is not appropriate / would not work / would be insufficient	<p>The proposed policy statement provides a range of transport support options that are targeted to ensure support for learners with a full spectrum of need. This includes:</p> <ul style="list-style-type: none"> • Direction to provider led 16 to 19 Bursary Fund • Subsidised travel cards for Young people who are not in education, employment or training (NEET) • Active Travel Strategy • Vacant Seat Payment Scheme • Care to Learn • Alternative Support for those learners requiring additional assistance <p>Where exceptional need is identified, the proposed policy allows for consideration of a KCC provided vehicle. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>
Lead to an increase in traffic on the roads	It is acknowledged that proposed changes could lead to an increase in the volume of traffic at key times. KCC estimates that the

	<p>proposals could result in a range of somewhere between 328 and 1310 additional vehicles across the county. KCC, however, considers that this is tolerable in light of the aims and objectives of the changes.</p> <p>The re-introduction of school led transport opportunities allows an opportunity for some of this impact to be mitigated.</p>
Young people qualifying for Personal Independence Payments/ have an EHCP should continue to receive funded transport	<p>While national legislation requires learners of sixth form age to remain in education or training, statutory entitlement to free school transport is not extended to these same learners. Councils are not provided dedicated funds to support transport for these learners. This means that national legislation and funding does not support an expectation that learners should be provided fully funded transport support, even if they have an EHCP or receive Personal Independence Payments. KCC has to assess what it is necessary to provide and must balance a range of factors and considerations in doing so.</p>
Those with physical disabilities face further challenges / add complications	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age, and that learners with physical requirements that are currently supported by vehicles may have difficulty in securing similar alternatives. The Equality Impact Assessment also noted that public transport options may be less suitable in such cases.</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
Potential difficulty in budgeting if in receipt of Personal Transport Budget	<p>PTB funding is provided on a monthly instalment basis, limiting the need for long term budgeting for recipients. Attendance will also be monitored and payments withheld where transport is not being provided.</p>
Parents / families should contribute to cost of transport	<p>Since 2024/25 academic year, all learners of sixth form age have been expected to provide some contribution to the transport support they receive. However, the</p>

	proposed policy statement still acknowledges that some learners, particularly those with SEND and or EHCPs require a higher level of support.
Establishments are not on public transport routes / not accessible by public transport	Following consultation responses from the education sector, the policy proposals have been adjusted to allow the development of bespoke, school-led transport alternatives to a PTB. This will allow establishments, including those that are less-accessible, to work in conjunction with KCC to maintain accessible links for students.
Concerned that money will not be used for its intended use	PTB funding is provided on a monthly instalment basis, limiting the need for long term budgeting for recipients. Attendance will also be monitored and payments withheld where transport is not being provided.
Live rurally so journeys are even more complicated	Proposed PTB scheme provides increased levels of funding to pupils that need to travel further to their place of learning. This will help mitigate the longer journeys that some rural families may experience.
Agree with Personal Transport Budget if it covers costs / can be used by family members / carers	KCC's Personal Transport Budget offer does not limit use of provided funds to specific types of transport. In nearly all cases, learners would receive higher than the usual mileage rate of 45 pence per mile and appeals processes remain available to allow individual circumstances to be considered. Similarly, funds can be used to engage other third parties to support an individual learners travel needs.
KCC should not be funding transport	While KCC is not directly funded to provide transport, it does have a duty to prepare and publish an annual transport policy statement specifying the arrangements for the provision of transport or other support that the authority considers it necessary to make to facilitate the attendance of all learners of sixth form age receiving education or training.
Complicated process / time consuming / concerns about application process	Learners of sixth form age are already required to apply for transport on an annual basis. The proposed changes will not have any negative impact on the application process or the time it takes to process them.
Travel training would not work	Proposed policy statement provides a range of transport support options that are targeted to ensure support for learners with a full spectrum of need. This includes: <ul style="list-style-type: none"> • Direction to provider led 16 to 19 Bursary Fund

	<ul style="list-style-type: none"> • Subsidised travel cards for Young people who are not in education, employment or training (NEET) • Active Travel Strategy • Vacant Seat Payment Scheme • Care to Learn • Alternative Support for those learners requiring additional assistance <p>Where exceptional need is identified, the proposed policy allows for consideration of a KCC provided vehicle. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p> <p>While travel training may not be appropriate to all learners, the proposed changes would allow travel training to be provided to suitable learners at an earlier stage in their education, providing them important life skills more quickly.</p>
Understand it's expensive for KCC / there are budget restrictions	N/A
Would welcome a train pass	<p>In the event a learner of sixth form age qualifies for additional support, they are not limited in how PTB funds are used, including type of vehicle and accompanying support.</p> <p>Learners may also apply for the National Rail 16-17 Saver which offers similar levels of savings to KCC's 16+Travel Saver bus pass.</p> <p>KCC has engaged with different transport providers a number of times previously, but train companies have been unwilling to provide lower cost passes.</p>

Section 2: Expectation students aged 19+ would initially apply for a discretionary bursary from their learning provider to facilitate travel before seeking support from Kent County Council (KCC). Where KCC decides to provide support beyond that provided by the learning provider, in most instances this would be in the form of a mileage payment.

Consultation feedback theme	Draft KCC response
Appears a complicated process / time consuming / concerns about application process	Learners of sixth form age and post 19 learners are already required to apply for transport on an annual basis. The proposed changes will not have any negative impact

	<p>on the application process or the time it takes to process them.</p> <p>However, it is acknowledged that it will require additional organisation to engage with learning providers before submitting an application to Kent County Council.</p> <p>Most learners in this category will have an EHCP, which means that they should have their following year's educational arrangements finalised at least 5 months before the start of the new academic year, which will provide a greater opportunity to complete these process. This will assist learners in initially applying for support via the 16 to 19 Bursary Fund.</p>
All education transport should be provided / funded by KCC / it's their responsibility	<p>KCC is not legally obliged to provide the level of support which it currently provides to post-19 learners. KCC has to assess what arrangements it is necessary to provide, and must balance a range of factors in making that assessment.</p> <p>National legislation and funding does not support an expectation that all learners should be provided fully funded transport support.</p>
Unfair / discriminatory for families / those with SEND	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age, and that they are likely to adversely impact some individuals with SEND. However, the proposals would in general (and subject to any support provided via a 16-19 bursary) continue to provide adult learners with SEND with a higher level of support than those without. In exceptional cases KCC will also consider making alternative arrangements. KCC is required to balance a number of considerations in deciding what support it is necessary to provide. As explained in the Equality Impact Assessment, KCC does not consider that the proposals are discriminatory.</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>

Making education inaccessible / young people will miss out / changes will affect attendance	<p>Local authorities have a duty to encourage, enable and assist young people with Special Educational Needs and/or Disabilities (SEND) to participate in education and training, up to the age of 25 but are not required to provide the level of support that KCC currently provides. Councils are also not provided dedicated funds to support transport for these learners.</p> <p>The proposals continue to provide elevated levels of support to learners with higher levels of need, ensuring all are supported to remain in education.</p> <p>However, as a result of the feedback received during the consultation, KCC have undertaken a more detailed analysis of existing pupil travel patterns. The Cabinet report and EqlA have been updated to provide a more granular analysis of the likely impact on those who have to travel further, as they are more likely to be negatively affected. This analysis identified that adult learners are more likely to be negatively impacted by these changes than learners of sixth form age, as they are more likely to have more complex transport arrangements to begin with. This analysis does also suggest that in most instances, learners who received a smaller level of support after historic policy changes continued to remain in education, although a small minority did cease to engage.</p> <p>The Equality Impact Assessment acknowledges that attendance may be impacted for some individuals, and sets out a number of ways in which the impacts of the policy would be mitigated.</p>
Establishments do not have the funds for this / already have a tight budget	<p>The 16 to 19 Bursary Fund is made available to learning providers by central government with the express intention of allowing them to provide financial support to help students overcome the specific financial barriers they face remaining in education, including but not limited to travel to and from school or college.</p> <p>This scheme's central funding indicates that government considers this sufficient to provide an appropriate level of support to</p>

	<p>adult learners across a range of financial needs.</p> <p>By contrast KCC is provided no direct funding for school transport for learners of sixth form age or adult learners. There is also no statutory entitlement to free transport support for these learners. While KCC has provided a higher level of support to this point, the consultation outlines why it has been necessary to reconsider what future level of support may be appropriate.</p> <p>KCC will take the outcome of an application for support via the 16-19 Bursary Fund into account in determining whether to provide additional support. This includes taking into account the fact that an application has been unsuccessful and that the individual has therefore not been able to secure support via alternative means.</p>
Young people cannot access public transport / travel independently	<p>KCC's proposed scheme includes the opportunity for bespoke travel training, to support those learners who are able to develop the necessary skills to make use of public transport.</p> <p>Where independent travel is not possible, the Bursary fund does not limit use of provided funds to specific types of transport. Where KCC assesses that any support provided to students via the 16 to 19 Bursary Fund is insufficient, learners would receive the mileage rate of 45 pence per mile. Exceptional circumstances will also be considered, and appeals processes remain available. Similarly, funds can be used to engage other third parties to support an individual learner's travel needs.</p>
Young people are entitled to an education	<p>KCC is not legally obliged to provide the level of support which it currently provides to post-19 learners. KCC has to assess what arrangements it is necessary to provide, and must balance a range of factors in making that assessment.</p> <p>National legislation and funding does not support an expectation that all learners should be provided fully funded transport support.</p>
Concerns with assessment / monitoring criteria / what are exceptional circumstances?	<p>Exceptional circumstances, by their nature, are not subject to categorisation or pre-defined criteria. KCC will consider requests for exceptional consideration on a case-by-case basis. The proposed policy makes clear that applicants should apply for</p>

	<p>support via the 16 to 19 Bursary Fund before approaching KCC for any additional support and that, in the vast majority of cases, additional support will be by way of a mileage payment.</p> <p>Policy wording has been clarified to make clear that progression for adult learners will not be directly linked to a certain qualification or career outcome.</p> <p>All policy related decisions are subject to independent Member appeal and Local Government and Social Care oversight.</p>
<p>Parents / carers affected / change working hours / give up work / can't be in two places at once</p>	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age. Additionally the Equality Impact Assessment acknowledges that families may need to change their routines to incorporate additional or longer journeys, and that this may negatively impact work or other commitments. The Equality Impact Assessment explained a number of ways in which the impacts of the policy would be mitigated.</p> <p>There is no legal entitlement to attend a specific learning provider without first considering how one might attend. It is already common practice in Kent for mainstream pupils and their families to have to manage the legal requirement to remain in education or training, without direct support from KCC to attend any learning establishment of their preference, although we acknowledge that this may be more complex or difficult in the case of individuals with additional needs. KCC will continue to provide additional support to these individuals, subject to appropriate support being provided by way of the 16 to 19 Bursary Fund.</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
<p>A bursary is discretionary / not guaranteed / establishments choose to fund or not</p>	<p>As there is no statutory entitlement to transport support for adult learners, funding</p>

	<p>is only ever provided if there is demonstrable need.</p> <p>The government funded 16 to 19 Bursary is intended to support adult learners with SEND including EHCPs to continue to engage with education. There is therefore an expectation funding will be provided where a clear need can be evidenced. In the event providers do not provide support via the 16 to 19 Bursary, adult learners can then apply to Kent County Council for consideration.</p>
<p>Special schools are often further away / are few & far between / little choice where to send young people</p>	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age.</p> <p>There is no legal entitlement to attend a specific learning provider without first considering how one might attend.</p> <p>As mileage payments are made on the basis of specific journeys, those with longer journeys will receive a higher level of support.</p> <p>As a result of the feedback received during the consultation, KCC have undertaken a more detailed analysis of existing pupil travel patterns, allowing a more granular analysis of the likely impact on those who have to travel further, as they are more likely to be negatively affected. This analysis suggests that the majority of learners travel fewer than 15 miles to their place of learning, but that more adult learners travel further than learners of sixth form age.</p> <p>However, balancing these impacts with the aims and objectives of the proposals, it is not considered that any further changes should be made to the proposed policy. KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
<p>Difficulty in arranging alternative transport</p>	<p>KCC provides online tools that support learners and their families when considering school travel planning</p>

Agree with bursary / good idea	N/A
Bursary is not appropriate / would not work / would be insufficient	<p>The 16 to 19 Bursary Fund is made available to learning providers by central government with the express intention of allowing them to provide financial support to help students overcome the specific financial barriers they face remaining in education, including but not limited to travel to and from school or college.</p> <p>In the event that any support provided to learners via the 16 to 19 Bursary Fund is insufficient to facilitate a person's attendance at their place or education or training, they can apply to KCC which will consider whether additional support is necessary.</p> <p>Additionally, where exceptional need is identified, the proposed policy allows for consideration of a KCC provided vehicle. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>
Establishments are not on public transport routes / not accessible by public transport	<p>As outlined in the main Cabinet paper, Post 16 learning providers engaged via the consultation process to suggest adjustments that would allow schools to offer an alternative to KCC provided support. The policy proposals have therefore been adjusted to allow the development of bespoke, school-led transport alternatives . This will allow less-accessible establishments to work in conjunction with KCC to maintain accessible links for students.</p> <p>Support provided by KCC is not limited to use on public transport, so any available funds could be allocated to other transport solutions.</p>
Families cannot afford to pay for transport / bursary will not cover costs	<p>The 16 to 19 Bursary Fund is made available to learning providers by central government with the express intention of allowing them to provide financial support to help students overcome the specific financial barriers they face remaining in education, including but not limited to travel to and from school or college.</p> <p>In the event that any support provided to learners via the 16 to 19 Bursary Fund is insufficient to facilitate a person's attendance at their place or education or</p>

	<p>training, they can apply to KCC which will consider whether additional support is necessary.</p> <p>However, balancing the likely impacts on those affected with the aims and objectives of the proposal, it is not considered that any further changes should be made to the proposed policy. Learners will receive mileage payments, so longer journeys will result in a higher level of support from KCC. In addition, those learners travelling further are more likely to receive support from the 16 to 19 Bursary.</p> <p>Where exceptional need is identified, the proposed policy allows for consideration of a KCC provided vehicle. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>
If claiming retrospectively, cannot afford to fund it in the first place	<p>Mileage payments will be made termly following the provision of fuel receipts. We acknowledge that learners may face additional financial challenge while awaiting repayment.</p> <p>Learners facing this level of financial challenge are more likely to qualify for the 16 to 19 Bursary, which means that funds will be made available, which may help mitigate this issue.</p> <p>Where exceptional need is identified, the proposed policy allows for consideration of alternative forms of support. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>
Affect young people in the long term / future / detrimental in the long term	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age. The Equality Impact Assessment also acknowledges the different ways in which individuals may be affected by the proposals. However, KCC must assess what support it is necessary to provide and balance a range of factors and considerations in doing so.</p> <p>KCC is consulting a full academic year before proposed changes may be</p>

	<p>implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p> <p>Adult learners with SEND including those with EHCPs will in general continue to receive a higher level of support than those without</p>
KCC should not be funding transport	<p>While KCC is not directly funded to provide transport, it does have a duty to prepare and publish an annual transport policy statement specifying the arrangements for the provision of transport or other support that the authority considers it necessary to make to facilitate the attendance of individuals within this cohort. KCC also has general duties to encourage, enable and assist young people with Special Educational Needs and/or Disabilities (SEND) to participate in education and training, up to the age of 25.</p>
Cannot apply a one-size fits all approach / all young people are different / have different needs	<p>The proposed policy statement provides a range of transport support options that are targeted to ensure support for learners with a full spectrum of need. This includes:</p> <ul style="list-style-type: none"> • Direction to provider led 16 to 19 Bursary Fund • Active Travel Strategy • Care to Learn, for young parents under 20. • Alternative Support for those learners requiring additional assistance <p>Similarly, as mileage payments are made on the basis of specific journeys, those with longer journeys will receive a higher level of support.</p> <p>Where exceptional need is identified, the proposed policy allows for consideration of a KCC provided vehicle. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>
Safety issues / safeguarding / vulnerable at risk when travelling	<p>Proposals include access to independent travel training for learners, to help them navigate public based transport options. However, the 16-19 Bursary Fund does not limit use of provided funds to specific types of transport. Funds can be used to engage other third parties to support an individual learners travel needs.</p>

KCC abandoning / neglecting young people	<p>KCC is not abandoning or neglecting young people, although it has carefully considered, and acknowledges, the impacts of the changes.</p> <p>KCC is not legally obliged to provide the level of support which it currently provides to post-19 learners. KCC has to assess what arrangements it is necessary to provide, and must balance a range of factors in making that assessment. KCC will continue to provide additional support in the form of a mileage payment to those adult learners who qualify, and subject to the learner applying in the first instance for support via the 16 to 19 Bursary Fund.</p>
No access to own transport / cannot drive	<p>The Equality Impact Assessment associated with this consultation acknowledges that proposals are likely to introduce new factors that learners and their families need to consider when deciding how to progress their education at sixth form age.</p> <p>There is no legal entitlement to attend a specific learning provider without first considering how one might attend.</p> <p>Any funding received from the 16 to 19 Bursary or KCC provided payment could be put towards alternative travel arrangements, including third party providers.</p> <p>KCC is consulting a full academic year before proposed changes may be implemented to allow learners and families to select education options that can be accessed with the proposed level of support.</p>
Happy to contribute to cost of transport	N/A
Personal Transport Budget would be preferable	<p>Where exceptional need is identified, the proposed policy allows for consideration of alternative forms of support. The policy also continues to provide an opportunity for learner to appeal to an independent panel where they feel that the provided support remains insufficient.</p>

Section 3: General feedback

Consultation feedback theme	Draft KCC response
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All education transport should be provided / funded by KCC	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Unfair / discriminatory to those with SEND / all have different needs	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Young people are entitled to an education / right to maximise opportunities in life	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Most vulnerable will be affected by this / removing support from those who need it	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Making education inaccessible	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
KCC just want to save money / stop cutting funding	<p>The consultation outlines the detrimental impact if KCC continues to provide transport support to learners of sixth form age and adult learners.</p> <p>No council wishes to reduce a level of provision that constituents have become accustomed to, especially where it provides beneficial support to increase educational opportunities. However, it is vital that any offer is sustainable.</p> <p>KCC is not provided direct funding for this area of transport support. This means the only alternative to proposals would be to either reduce funding support in other areas of the council or increase council tax.</p> <p>The consultation document also explained the other factors, beyond purely financial considerations, which informed KCC's development of the proposals.</p>
Parents / carers affected / change working hours / give up work / can't be in two places at once	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Cannot access public transport / travel independently / travel training would not work	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
KCC should save money elsewhere / not waste money	<p>The Cabinet paper outlines that KCC has been required to find almost £1 Billion in savings since 2011. These savings are a requirement of the reduced funding councils have received from central Government during that period.</p> <p>KCC has protected investment in Post 16 transport during this period, however, the consultation outlines why this is no longer sustainable, and the negative consequences for all residents if it were to continue.</p>

Detrimental in the long term / affect their future	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Bursary would be insufficient / not cover costs	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Safety issues / safeguarding / vulnerable at risk when travelling	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
KCC's responsibility / should not all be the family/carers / KCC have better resources	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Provide minibuses to establishments to collect young people en route	Following consultation responses from the education sector, policy proposals have been adjusted to allow the development of bespoke, school-led transport alternatives to a PTB/Bursary. This will allow less-accessible establishments to work in conjunction with KCC to maintain accessible links for students and will likely result in them using KCC provided funding to secure their own minibuses, or facilitate the wider use of existing vehicles.
What are exceptional circumstances? Definition required	Exceptional circumstances, by their nature, are not subject to categorisation or pre-defined criteria. Proposed policy makes clear that it is expected that most pupils will be provided a Personal Transport Budget where they are identified as benefiting from increased levels of support. All policy related decisions are subject to independent Member appeal and Local Government and Social Care oversight.
PTB / bursary are insufficient to cover travel costs / £600 contribution is too much	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Young people qualifying for PIP / have an EHCP should continue to receive funded transport	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
Should be on a case by case basis	The proposed policy will consider learners on a case by case basis
Happy to contribute to cost of transport if KCC organise it	While KCC has provided a higher level of support to this point, the consultation outlines why it has been necessary to reconsider what future level of support may be appropriate. The Cabinet paper outlines how increasing the contribution cost was considered, but found to be less suitable overall than the proposed changes.
Special schools are few & far between / little choice where to send young people / lack of public transport to them	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above

Legally obligated to be in education until 19	We have responded to this element of consultation feedback, in respect of both cohorts affected by the changes, above
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