



West Dunbartonshire Council Education, Learning and Attainment

REPORT ON THE OUTCOME OF THE CONSULTATION RELATING TO THE PROPOSAL

to discontinue arrangements for the provision of transport for pupils attending catchment schools.

Published 16 June 2023

This report has been published by West Dunbartonshire Council in response to the statutory consultation undertaken under the terms of the Schools (Consultation) (Scotland) Act 2010. The report will be published on the Council's website for a period of no less than 3 weeks prior to final consideration by the Educational Services Committee on 7 July 2023.

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1. INTRODUCTION

1.1 This is a consultation response report prepared in compliance with the Schools (Consultation) (Scotland) Act 2010 following consultation on the West Dunbartonshire Council (The Council) proposal to discontinue arrangements for the provision of transport for pupils attending catchment schools.

1.2 The purpose of the response report is to:

- Provide a record of the total number of responses made during the Statutory Consultation period;
- Provide summary of the written responses;
- Provide details of oral representations made at the public meetings held on 18, 19 and 25 April 2023;
- Provide a statement of the Council's response to those written and oral representations;
- Provide the full text of Education Scotland's report and a statement of the Council's response to this report;
- State how the Council reviewed the above proposal following the representations received during the Statutory Consultation period and the report from Education Scotland;
- Provide details of any omission from, or inaccuracy in, the Proposal Paper and state how the Council acted on it; and
- State how the Council has complied with Sections 11A to 13 of the Schools (Consultation) (Scotland) Act 2010 when reviewing the above proposals.

2. BACKGROUND

2.1 On 21 December 2022, Council approved a savings option to reduce School Transport towards statutory limits taking account of safe routes to school and increasing free bus pass update and work with bus companies to increase provision at busy times.

2.2 Because this saving option, if enacted, would involve discontinuing the existing arrangements for the provision of transport to pupils attending denominational schools, the Council was required to carry out a consultation process as detailed in the Schools (Consultation) (Scotland) Act 2010, Schedule 1, Paragraph 8 which states:

“Transport to denominational school proposal to discontinue arrangements for the provision of transport by the education authority for pupils attending a denominational school.”

2.3 On 8 March 2023 the Educational Services Committee agreed to commence formal consultation on the proposal, and that a report outlining the results of the consultation and making appropriate recommendations be presented to a meeting of the Educational Services Committee that was provisionally scheduled to be held on Wednesday 5 July 2023 (subsequently confirmed for Friday 7 July 2023).

2.4 THE PROPOSAL

2.4.1 West Dunbartonshire Council proposed, subject to approval from Education Services Committee and the outcome of the consultation process:

- from August 2023, the discontinuation of the existing school transport arrangements whereby any primary aged pupil who resides more than 1 mile from their catchment school, and any secondary aged pupil who resides more than 2 miles from their catchment school will be provided with transportation;
- replacing the existing school transport arrangements with a revised home to school distance, whereby any primary aged pupil who resides more than 2 miles from their catchment school, and any secondary aged pupil who resides more than 3 miles from their catchment school will be provided with transportation.

3. THE CONSULTATION PROCESS

3.1 The statutory consultation process, which requires the Council to adopt a robust and transparent framework for school consultations was undertaken in respect of the proposal. The consultation document developed for consideration included information on the:

- Proposal;
- Consultation process;
- Arrangements for public meetings;
- On how to participate in the consultation;
- Educational benefits of the proposal; and
- Consultation timeline

3.2 An electronic link to the Proposal Paper was issued by email to the stakeholders detailed within that document. The Proposal Paper and details of the consultation were made available on the consultation section of the Council's website: [School Transport Consultation](#)

3.3 The Act requires a consultation period of at least 6 weeks which must include at least 30 school days. The consultation period for this project was from Thursday 9th March 2023 until Tuesday 9th May 2023 inclusive (the period covered a total of 44 days to allow for the "clear days" rule and accommodate 13 days where schools were closed due to an in-service day, a long weekend and the spring break).

3.4 The requirements for consulting on a relevant proposal relating to schools are set out in the Schools (Consultation) (Scotland) Act 2010 and the following steps were taken to ensure compliance with the Act:

- Proposal Paper published on Friday 24 March 2023.
- Statutory consultees were sent an email providing a link to the Proposal Paper and details of where, and how to obtain a paper copy free of charge and how to participate in the consultation.

- Schools distributed details of the consultation to staff and parents/carers.
- Proposal Paper published on the West Dunbartonshire Council website and available in paper copy upon request, and information on the consultation published on social media.
- Public notice in the 'Dumbarton Reporter' and 'Clydebank Post' newspapers advising of the consultation.
- Public consultation meetings were held on 18, 19 and 25 April 2023 to facilitate participation, sharing of information and gathering views.
- Education Scotland's involvement consisted of: Proposal Paper being sent to them, attendance at public consultation meetings, follow up consultation meetings with Head Teachers, Pupils, Parent Council representatives, and Church representatives. Education Scotland were also provided with copies of online survey results/comments, written representations and minutes of the public meetings held which contained oral representations.

3.5 In accordance with statutory requirements and good practice, the following relevant stakeholders were consulted:

- Education Scotland;
- The Archdiocese of Glasgow of the Roman Catholic Church;
- the Parent Councils of West Dunbartonshire Primary and Secondary Schools;
- the parents/carers of pupils attending all West Dunbartonshire Primary and Secondary Schools;
- the parents/carers of any children expected by West Dunbartonshire Council to attend the primary schools listed in section 4.1 above within two years of the date of publication of this Proposal Document (with that date of publication being defined in the table included in section 7.2 above), including those pupils attending all private and voluntary pre-school nurseries in the West Dunbartonshire area;
- the pupils attending all West Dunbartonshire Primary and Secondary Schools (insofar as this is possible and taking cognisance of the age and maturity of the pupils);
- the teaching and support staff of all West Dunbartonshire Primary and Secondary Schools;
- the trade union representatives of the above staff;
- the constituency MSPs;
- the constituency MP; and
- Neighbouring local authorities.

4. PUBLIC CONSULTATION MEETINGS

4.1 Three public consultation meetings were held, one in each of the main population centres of Dumbarton, Clydebank and the Vale of Leven.

4.2 The first meeting was held on 18 April 2023 in Our Lady & St. Patrick's High School (7.00 p.m. – 8.30 p.m.) with 30 members of the public, 5 staff

members and an HM Inspector attending the meeting. It was also possible to attend the meeting online, with 3 participants joining remotely. Notes from this meeting are included as Appendix A.

- 4.3 The second consultation meeting was held on 19 April 2023 in St Peter the Apostle High School (7.00 p.m. – 8.30 p.m.) with 8 members of the public and 4 staff members attending the meeting. It was also possible to attend the meeting online, with 2 participants joining remotely. Notes from this meeting are included as Appendix B.
- 4.4 The third consultation meeting was held on 25 April 2023 in Vale of Leven Academy (7.00 p.m. – 8.30 p.m.) with 10 members of the public and 4 staff members attending the meeting. It was also possible to attend the meeting online, with 3 participants joining remotely. Notes from this meeting are included as Appendix C.

5. RESPONSES TO THE CONSULTATION EXERCISE

- 5.1 Members of the public were encouraged to respond to the consultation through the online survey, by phone or in writing.
- 5.2 A total of 542 respondents responded through the online survey as detailed below.

Are you a resident of West Dunbartonshire?	Number of responses	% of responses
Yes	527	97.8%
No	12	2.2%
TOTAL	539	

- 5.3 A breakdown of category of interest from respondents is detailed below.

From the options below, please select the most appropriate one to indicate your interest in this consultation	Number of responses	% of responses
Child / Young Person in receipt of school transport	97	18%
Child / Young Person not in receipt of school transport	119	22%
Parent / Carer of child / young person in receipt of school transport	111	20.6%
Parent / Carer of child / young person not in receipt of school transport	180	33.3%
Member of teaching / non teaching staff	10	1.9%
Trade Union Representative	0	0%
Representative of School Parent Council	4	0.7%
Other	13	2.4%

TOTAL	540	
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Note – ‘Other’ includes (‘Child who will eventually need transport’ (1), ‘Concerned Citizen’ (1), ‘Concerned Member of the public’ (1), ‘Concerned Uncle’ (1), ‘Grandparent’ (1), ‘Grandparent of child travelling from Old Kilpatrick’ (1), ‘Interested individual’ (1), ‘Milton resident’ (1), ‘My daughter has used the school bus before to Milton’ (1), ‘Parent’ (1), ‘Parent of child not yet at school but will benefit from the transport currently offered when he does go’ (1), ‘Parent of future pupil’ (1), and ‘Relative of pupil’ (1))

- 5.4 A summary of the completed online responses to the consultation question ***‘Do you agree that West Dunbartonshire Council should bring transport provision for schools more in line with the safe walking distance to school?’*** is detailed below. Although the majority of the respondents stated they were in favour of the proposal, this does not correspond with the comments received, which is further explored in 5.5 below.

Do you agree that West Dunbartonshire Council should bring transport provision for schools more in line with the safe walking distance to school?	Number of responses	% of responses
Yes	347	64%
No	195	36%
TOTAL	542	

- 5.5 A total of 230 respondents chose to provide a reason for their answer. On closer inspection, responses stating ‘yes’ did not reconcile with the comments offered. When viewing only the 230 responses who also commented, 26 were in favour (11.4%), with 203 (88.6%) being against the proposal. (one comment was excluded, as the response was not a word).

If you wish, please provide a reason for your answer:	Number of responses	% of responses
In favour of the proposal	26	11.4%
Against the proposal	203	88.6%
TOTAL	230	

It is clear from this that many respondents had misunderstood the question. This was raised directly as a question at the Vale of Leven public consultation meeting, but not at the Dumbarton or Clydebank meetings.

- 5.6 With 230 responses, it was not possible to respond to each individually. Instead, points raised across all the responses have been grouped into themes below, with a response provided to the theme.
- 5.7 There were 15 responses by email and 1 response by phone. No written responses were received by post. The points raised in the responses have been grouped with the responses to the online survey and the public meetings, as the same themes were raised. We received a submission from

the Archdiocese of Glasgow of the Roman Catholic Church and First Bus during the consultation period, and a response from SPT received out with the consultation period (which has been included).

6. SUMMARY OF ISSUES RAISED BY STAKEHOLDERS AND EDUCATION AUTHORITY RESPONSE

- 6.1 From the 230 online response forms that included a comment, the points raised at the public meetings and the submissions received by email, a number of key themes emerged. The theme and response from Education Services is detailed below.

Theme 1: Safety

The largest volume of concerns raised related safety. This took many forms, whether it was safety of children and young people walking to school, the routes that they would follow, the availability of suitable crossing points, the speed of traffic on the roads, the suitability of footpaths, the impact of weather, the seasonal variability of daylight, the provision of street lighting, safety of children and young people from other pedestrians (including other children), behavior of children and young people walking to school, gritting of pavements during winter, assessments of safe routes, and independent verification of safety assessments.

Response: Where transport is not provided, it is the parents' responsibility to ensure their children and young people get to school. Only children and young people who have the required road safety sense should walk to school unaccompanied by an adult. A number of routes were regarded as unsafe to walk by the roads team, and will therefore still be eligible for transport. Where a route was regarded as safe to walk, this was due to the suitability of footpaths, crossing points, lighting and gritting of pavements in winter. Where routes were walked by the roads team, it is accepted that this was done at a certain time of day, and did not experience the variety of seasonal conditions, or the volume and behavior of young people also walking the same route. This also did not account for carrying equipment/musical instruments to and from school. It was suggested that independent verification of safety assessments should be provided, but this was not the view of corporate health and safety.

Theme 2: Impact on Attendance

Many respondents raised the issue of the impact the increased walking distance would have on attendance. With a greater distance to walk to school, many pupils will simply not attend school on the days where weather is wet or clothing was wet from the day before, or days that they cannot take another form of transportation.

Response: This is an existing risk for children and young people who already walk to school, but it is accepted that the proposed change may increase the

number of children and young people affected. Schools and central staff will monitor attendance of affected children and young people to ascertain if this presents as a pattern or has an impact.

Theme 3: Time taken to walk to school

Increasing the distance from 2 miles to 3 miles for secondary age pupils will see some young people having to walk for two hours each day on their journeys to and from school. This has an impact on the length of their day, but also on their preparedness – tiredness, providing suitable clothing and footwear increases costs for households, and some young people have to carry work/materials/sports equipment/musical instruments to and from school.

Response: The 2 miles distance from primary and 3 miles distance from secondary is suggested by the Scottish Government as being a safe walking distance. For those not used to walking such distances each day, it will initially have an impact on energy levels, but regular exercise has been proven to impact positively on mental and physical health. It is accepted that carrying some items to and from school without transportation will be challenging. Providing suitable clothing for walking to and from school will place a burden on households. Some schools already offer a second hand clothing bank where items that no longer fit can be exchanged for others, and all schools would be encouraged to offer similar.

Theme 4: Weather

With the weather frequently being wet, children and young people will now be at greater risk of arriving at school wet, and having to sit through school with wet shoes/clothes, only to then have to make the return journey home at the end of the day in wet clothes. Providing suitable wet weather clothing and footwear will negatively impact households financially, as will drying clothes and footwear that has got wet in time for the next day.

Response: This is presently a risk for anyone walking to school irrespective of the proposed change, but a rise in the number of children and young people walking to school would increase this, and increase the financial pressure on households. Some schools already offer a second hand clothing bank where items that no longer fit can be exchanged for others, and all schools would be encouraged to offer similar.

Theme 5: Households with children attending different establishments

A number of households have children attending different establishments. It will be impossible for some households to take a child to nursery whilst also walking a child to primary school.

Response: For some households who have children attending multiple establishments this is an existing challenge, irrespective of the change in home to school distance, however the proposed change could see an increase in the number of households affected. Some households choose to ask family or friends to assist, or group together to share the journeys. Nurseries, schools or Parent Council's may be able to offer advice to households looking to group together to share journeys.

Theme 6: Contracts for school transport

There are existing contracts in place for school transport, and some presently being procured for replacement. Many respondents asked about the timescale for changes, and the capacity of existing contracts to carry more children and young people.

Response: The proposal would see changes introduced in two phases – in August 2023 ceasing the provision of WDC purchased travel passes for those children and young people presently making use of public transport to get to and from school, requiring them to make use of the Under 22 Travel Pass to access the same service instead. The second phase in August 2024 would see the removal of dedicated contracts for those children and young people who would no longer be eligible. In effect, there would therefore be no discernable difference for children, young people and families the school session 2023-24, allowing a greater time to prepare for the change.

Contracts would continue to operate for those children and young people that would still be eligible for transport. Due to the size of vehicle used by operators, some of these contracts run with spare capacity – where this occurs, WDC offer a 'privilege seats', where children and young people can make use of these spare seats at a cost. More information about privilege seats can be found on our website at <https://www.west-dunbarton.gov.uk/schools-and-learning/schools/school-travel-and-trips/school-transport/>

Theme 7: Accessibility of consultation

A number of responses questioned how accessible the consultation was, referring to publicity of the consultation, the accessibility of the materials published and shared, and the locations of the public meetings.

Response: The method of sharing consultation materials was agreed at committee in March 23. Materials were publicized and shared on the website and social media, and the public consultation were made available online. The locations of the public meetings were chosen to ensure that there was a public meeting in each of the main population centres of Dumbarton, Clydebank and the Vale of Leven. Feedback gathered on the methods of publicity will be used to inform future consultations.

Theme 8: Identification and realization of benefits

A number of responses questioned the process to identify benefits, and several responses questioned whether benefits would ever be realized.

Response: Benefits were identified by Council Officers, and did not involve a benefits workshop or scoring mechanism with stakeholders. It is conceded that many of the benefits would only be realized if children and young people swapped the existing bus journeys for a more active method of travel to and from school. Without this, it is anticipated that vehicular traffic to and from affected schools may increase.

Theme 9: Provision of public transport

A high number of respondents questioned the provision, availability and suitability of public transport, as many felt that young people would make use of this instead of walking to school, but many respondents felt that the provision was insufficient. It was also suggested that provision of public transport should be guaranteed prior to any change in the policy.

Response: The intention of the change in policy would be to increase the volume of active travel, but it is to be expected that any change would have an impact on both the use of private vehicles and public transport. First Bus responded directly to the consultation stating that 'Any decision should not assume that the required capacity on local service buses will automatically exist or be provided. [We] would strive to accommodate any displaced pupils within [our] existing timetables, however it is unlikely that additional journeys would be provided given the cost to provide this and the variability of school finish times throughout the week.' Whilst the existing services offered would be able to accommodate pupils in the Clydebank area making their way to and from school, the provision in Dumbarton and the Vale of Leven would not.

Theme 10: Promise of provision of transport at the time of OLSP relocation

At the time of the consultation on the proposal to move Our Lady & St. Patrick's High School from the previous site in Castlehill to its existing site in Bellsmyre assurances were made about the provision of transport for children and young people from Dumbarton West – particularly the areas of Brucehill, Castlehill and Westcliff and the surrounding streets that would qualify for transportation to school.

Response: The planning condition on the development of the existing OLSP stipulated that a School Travel Plan and Workplace Travel Plan would be produced and implemented. At the time it was noted that the eight services transporting pupils to school would continue, but this was nine years ago, and not a planning condition.

Theme 11: Equity of provision

Due to the location of OLSP and the proposed 3 mile distance, privately owned houses at the extremities of Dumbarton West will still qualify for school transport, when local authority and housing association tenants in Brucehill, Castlehill and Westcliff and the surrounding streets would not.

Response: The 2 miles distance from primary and 3 miles distance from secondary is suggested by the Scottish Government as being a safe walking distance. The location of the school would always impact households on either side of the 2 or 3 mile distance. Whilst it is true that the areas of Brucehill, Castlehill and Westcliff would no longer qualify for transportation to OLSP, there are many privately owned houses in the area also affected.

Theme 12: Impact on denominational schools

The legislation is there to ensure that any change does not adversely affect denominational schools more than non-denominational schools. It is clear that due to the size of their catchment areas, OLSP, St. Mary's (Alexandria) and St. Eunan's are more affected than others.

Response: Of the schools affected, OLSP shares the same catchment area as both Dumbarton Academy and Vale of Leven Academy combined. The change negatively impacts 130 young people (24.4%) transported to OLSP, whilst 403 young people transported (75.6%) will still receive transportation. Of those being transported to Vale of Leven Academy, 153 are negatively impacted (83.2%), with 31 still receiving transportation (16.8%). Of the young people transported to Dumbarton Academy, 5 will be negatively impacted (22%), with 18 (78%) still receiving transportation. Whilst a small number of children would still be eligible for transport to Linnvale Primary due to the size of the catchment area, no children would still be eligible for transport to St. Eunan's Primary, or St. Mary's (Alexandria). It must be noted however that if you live in West Dumbarton, Dumbarton Academy is physically closer than OLSP, which may indirectly impact people's choice of school.

6.2 A written submission was received from the Archdiocese of Glasgow of the Roman Catholic Church (Appendix D), who, for the following reasons, do not agree with the proposal:

1. *The proposal would further disadvantage pupils who reside in SIMD 1 and 2 datazones by taking a blanket approach to distance – perhaps a clause that allows pupils in these areas more support, considering their personal circumstances, ensuring an equitable approach.*

a. **Response:** The proposal was based on home to school distance, and not a change based on any other criteria.

2. *While you are encouraging 'safe walking' and list benefits of this, many parents will not want their sons and daughters to undertake this mode of travel for safety reasons. This may mean more car journeys or parents having to accompany younger pupils on buses which may impact on their ability to undertake employment thus causing further hardship.*

a. **Response:** It is conceded that many of the benefits would only be realized if children and young people swapped the existing bus journeys for a more active method of travel to and from school. Without this, it is anticipated that vehicular traffic to and from affected schools may increase. Parents having to accompany younger children on buses may impact on their employment and cause further hardship.

3. *For some, if not travelling by bus, the journey to school will take longer. We consider that this may mean increased absences from school particularly in winter and inclement/cold weather. This may result in a fall in the attainment of those pupils resulting in increased disadvantage for them.*

a. **Response:** This is an existing risk for children and young people who already walk to school, but it is accepted that the proposed change may increase the number of children and young people affected. Schools and central staff will monitor attendance of affected children and young people to ascertain if this presents as a pattern or has an impact.

4. *If children are walking to school, they will require proper clothing for wet and windy weather if they are to remain healthy and fit to learn. This will place even more financial pressure on parents already struggling in our economic climate.*

a. **Response:** This is presently a risk for anyone walking to school irrespective of the proposed change, but a rise in the number of children and young people walking to school would increase this, and increase the financial pressure on households. Some schools already offer a second hand clothing bank where items that no longer fit can be exchanged for others, and all schools would be encouraged to offer similar.

5. *It is recognised and appreciated that all young people between the ages of five and twenty-two years in Scotland have access to free bus travel, which in itself is a huge support to families. However, travelling by public transport at peak school times will be problematic not only for pupils but for the wider population, in terms of ease of access, reliability and safety. This may result in increased late coming to schools at the start of the day and a later time home for pupils thus increasing the length of their journeys and their overall 'school' day.*

a. **Response:** The proposal was based on children and young people taking an active travel route to school, but it is conceded that many will

look to make use of public transport. Whilst the existing services offered would be able to accommodate pupils in the Clydebank area making their way to and from school, we understand from local providers that the provision in Dumbarton and the Vale of Leven would not.

6. *Given that if this proposal is passed it will impact on the provision of buses and bus timetabled, we note that the bus companies are not included in the list of consultees.*

a. **Response:** School transport is procured through SPT, who responded to the consultation. Some local operators responded through the consultation exercise.

7. *That the two denominational secondary schools have a wider catchment area than the non-denominational secondary schools. In fact, half of the population of Our Lady and St Patrick's High School will lose transport if your proposal goes through. It may be that parents rather, than having their children travel the new distance by foot or public transport, may feel forced to decide to send their son or daughter to the nearest non-denominational school. This could be regarded as indirect discrimination by the Council towards Catholic pupils.*

a. **Response:** Due to assessments of safe walking routes, 403 young people presently transported to OLSP (75.6%) will still receive transportation, with 130 young people (24.4%) no longer being eligible. From the 3 mile boundary of OLSP in West Dumbarton, it is only 2.1 miles to Dumbarton Academy, so it is accepted that it would be quicker and easier to travel to the non-denominational school than the denominational school.

8. *At a reasonable pace an adult will walk 3 miles in one hour. This means that some secondary aged pupils will be adding 2 hours onto their school day. This will impact on their capacity to remain in school for clubs, supported study and on their opportunity to do homework.*

a. **Response:** Increasing the distance for eligibility will impact on the length of time taken to get to school. The existing provision of school transport impacts on the potential of after-school clubs, as buses leave the school at a specific time.

9. *While the intention to encourage walking to school is admirable, there is concern that removing organised school transport will only increase private cars, with parents (who have cars) choosing to drive their children to school, thus causing congestion and pollution at peak times.*

Response: It is conceded that many of the benefits would only be realized if children and young people swapped the existing bus journeys for a more active method of travel to and from school. Without this, it is anticipated that vehicular traffic to and from affected schools may increase, resulting in greater congestion and pollution and peak times.

6.3 Submissions were also received from First Bus during the consultation period, and from Strathclyde Partnership for Transport (SPT) (Appendix E) after the consultation period had ended. The main points raised by First Bus and SPT are outlined below:

1. First Bus responded stating that ‘Any decision should not assume that the required capacity on local service buses will automatically exist or be provided. [We] would strive to accommodate any displaced pupils within [our] existing timetables, however it is unlikely that additional journeys would be provided given the cost to provide this and the variability of school finish times throughout the week.’

a. **Response:** The Council welcomes the responses from First Bus notes that whilst the existing services offered would be able to accommodate pupils in the Clydebank area making their way to and from school, we understand from local providers that the provision in Dumbarton and the Vale of Leven would not.

2. SPT responded suggesting that an Equalities Impact Assessment be undertaken prior to any change in policy to ensure that the travel needs of children and young people were understood, the sustainable transport and transport infrastructure were assessed, and that the strategy develops sustainable travel and transport infrastructure in West Dunbartonshire.

a. **Response:** An EIA has been undertaken in relation to this proposal.

3. SPT welcomed the Council’s reference to safety in the proposal and considered this to be the most critical factor in decision making. An analysis of increase in car journeys should be undertaken if the change is implemented, as well as ensuring that it is not a blanket introduction of the change in eligibility, but that safety of individual routes is taken into consideration. It may be that additional infrastructure to promote active travel is required prior to the implementation of any change.

a. **Response:** It is anticipated that vehicular traffic to and from affected schools may increase, resulting in greater congestion and pollution and peak times. A survey of this would be undertaken, with a view to any change measures being implemented. Individual routes have been assessed by the roads team to determine suitability. Regular reviews of schools Travel Plans would accommodate any change in infrastructure at school level, and would fit with the wider Council objective to promote sustainability.

4. SPT highlighted the potential increase in demand for public transport services. Prior to the implementation of any change, the Council should confirm through dialogue with local operators whether the existing infrastructure would be able to accommodate the increase in demand, or whether they would seek to strengthen provision to meet this need. The Council should engage with

Sustrans and continue to promote the uptake of the Under 22 Travel pass scheme.

- a. **Response:** First bus also responded to the consultation. Whilst the existing services offered would be able to accommodate pupils in the Clydebank area making their way to and from school, we understand from local providers that the provision in Dumbarton and the Vale of Leven would not. The Council continue to engage with Sustrans to develop sustainable infrastructure and to support active travel. The Council has a high uptake of the Under 22 Travel pass scheme, with direct intervention in our schools by partners to target individual young people who are yet to benefit from the scheme.

7. EDUCATION SCOTLAND REPORT AND EDUCATION AUTHORITY RESPONSE

- 7.1 In accordance with the Schools (Consultation) (Scotland) Act 2010, a report was produced by Education Scotland on the educational aspects of the proposal. Education Scotland agree that the proposal is in line with national guidance and statutory walking distances. Education Scotland also agree that there are potential benefits through active travel, but do not agree that the Council have set out sufficiently the potential educational benefits to address concerns raised by stakeholders.
- 7.2 The Education Scotland report can be read in full in Appendix F, and the summary conclusions from the report are presented below.
- 7.3 The Council welcomes the report from Education Scotland and accepts its response to the Council's proposal. The report highlighted that almost all stakeholders raised significant concerns. These include the safety of children and young people while walking to and from school, and the reliability, availability and capacity of public transport to meet increased demand. Most stakeholders also have a concern that the proposal, if implemented, would incur financial costs for families already facing significant financial hardship. Stakeholders are also concerned about the potential for lower attendance which will impact on attainment and achievement. Should this proposal be agreed, it will be important for the Council to work with stakeholders to address their concerns.
 - **Response:** The safety of children and young people walking to and from school; the reliability, availability and capacity of public transport to meet increased demand; the financial impact on families already facing significant financial hardship; and the impact on attendance and attainment were amongst the themes identified by stakeholders during the consultation. A number of walking routes were identified as not being safe, so in these instances transport would still be provided. Whilst the existing public transport services offered in the Clydebank area would be able to accommodate pupils making their way to and

from school, we understand from local providers that the provision in Dumbarton and the Vale of Leven would not. Whilst some schools already have facilities in place for families to exchange items of clothing, it is conceded that there would be a financial impact on households catering for children and young people walking to and from school, many of whom are already facing significant financial hardship. The proposed change may also have an impact on attendance and attainment.

7.4 The report also highlighted that the online survey main question may have been misunderstood by respondents and therefore the outcome may not be accurate. The survey responses do not fully reflect the comments or the issues raised by stakeholders who met with HM Inspectors. The Council will need to consider if this data should be used to inform the final decision.

- **Response:** as stated in 5.4 and 5.5 above, the response to the main question in the online survey does not reflect the vast majority of comments made throughout the consultation, as reflected in the 12 themes shown in section 6.1 above. Whilst a small number of comments were in favour of the proposed change, the vast majority were against the proposal.

8. ALLEGED OMISSIONS OR INACCURACIES

8.1 Section (10) (3) of the 2010 Act also places a requirement on the Council to provide details of any inaccuracy or omission within the Proposal Paper which has either been identified by the Council or raised by consultees. This section of the 2010 Act also requires the Council to provide a statement on the action taken in respect of the inaccuracy or omission, or, if no action was taken, to state that fact and why.

8.2 In the course of the consultation exercise, there were no areas identified by respondents as being inaccurate or omitted from the Proposal Paper during the consultation period.

9. COMPLIANCE WITH SECTION 9(1) OF THE SCHOOLS (CONSULTATION) (SCOTLAND) ACT 2010

9.1 Section 9(1) of the Schools (Consultation) (Scotland) Act 2010 states that: After the Education Authority has received Education Scotland's report, the Authority is to review the relevant proposal having regard (in particular) to:

- written representations received by the Authority (from any person) during the consultation period;
- oral representations made to it (by any person) at the public Meeting; and
- Education Scotland's report.

9.2 Following receipt of the Education Scotland report, the Council has reviewed

the proposal, having regard to the written and oral representations made and to Education Scotland's report.

- 9.3 The feedback from the consultation was considered by officers where all the questions and comments raised were considered in detail. This ensured that the Council met the requirements to review the proposal under section 9(1) and 13(5) of the 2010 Act.
- 9.4 Officers of the Education Authority have listened carefully to the points made at the public meeting and have considered equally carefully the Education Scotland report, online representations and written submission.
- 9.5 The proposal was reviewed to consider whether any of the representations led to the Council to reconsider any other reasonable alternatives to the proposal. It is clear from the responses received that the vast majority of stakeholders are against the proposal.
- 9.6 As the grounds for the proposal were based on a saving to the Council, a reasonable alternative would be to maintain the existing home to school distance, but remove the provision of bus passes by the Council for use on public service buses, requiring children and young people who use public service buses to make use of their Under 22 travel pass instead. In the exceptional circumstance where a child or young person is unable to obtain or utilise an Under 22 Travel Pass, the Council would ensure the young person was provided with suitable support. This change would have no direct impact on stakeholders, and save the Council in the region of £185,000 per annum. This would be £15,000 short of the projected saving for 2023/24, and £115,000 short of the projected saving for 2024/25.
- 9.6 The educational benefits were reviewed in respect of the Education Scotland report and representations made. It is clear that the Council did not set out sufficiently the potential educational benefits to address concerns raised by stakeholders. Further work will be done through school travel plans to increase the uptake of active travel options, and Education will continue to support the wider work of the Council to improve sustainability.

10. LEGAL ISSUES/NEXT STEPS

- 10.1 The Council has complied in full with the requirements of the Schools (Consultation) (Scotland) Act 2010 throughout this statutory consultation.
- 10.2 Under the terms of the Schools (Scotland) (Consultation) Act 2010, it is a legal requirement that the Council should not reach any formal decision without waiting until a period of three weeks starting on the day on which this Consultation Report is published in electronic and printed form has expired.
- 10.3 This Consultation Report will be published, both electronically and available in written form, if required, on Friday 16 June 2023, this meets the statutory

requirement to publish this report for three weeks before the report on the consultation is considered by Educational Service Committee on Friday 7 July 2023 for final decision. If approved the Council will ensure continued engagement with all stakeholders throughout the implementation of any change to the policy.