

Transport Home to School Transport Assistance On line application - Consultation Questionnaire

Consultation Questionnaire

**1. Name / Name of school or other organisation (optional):**

Fermanagh and Omagh District Council

**2. Please select the category that best describes you as a respondent:**

**(Please select one box only)**

- Parent/Guardian
- Pupil
- Member of School Staff (Teaching)
- Member of School Staff (Non-Teaching)
- Governor (Individual)
- Board of Governors
- Education/Sectoral Support
- Political Representative
- Local Government Representative
- General Public
- Other (please specify)

Local Government Authority – District Council

## Transport Home to School Transport Assistance On line application - Consultation Questionnaire

### Transport Policy

\* 3. Having read the documentation on Home to School Transport Assistance - Online application I consider that:

**The process meets the stated objectives and aims:**

- Agree
- Disagree
- Uncertain

\* 4. Having read the documentation on Home to School Transport Assistance - Online application I consider that:

**The reason for this change has been clearly outlined:**

- Agree
- Disagree
- Uncertain

\* 5. Having read the documentation on Home to School Transport Assistance - Online application I consider that:

**The proposed communication arrangements outlined are suitable:**

- Agree
- Disagree
- Uncertain

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### Transport Policy

**\* 6. Having read the documentation on Home to School Transport Assistance - Online application I consider that:**

**This procedure will be beneficial to those applying for Home to School Transport assistance and will lead to faster decision making by the Authority in terms of transport eligibility:**

- Agree
- Disagree
- Uncertain

**\* 7. Having read the documentation on Home to School Transport Assistance - Online application I support the direction of change being proposed in terms of the online application process:**

- Agree
- Disagree
- Uncertain

**8. Please use the space below if you wish to make any further comments:**

Please see overleaf

## **Draft response to Question 8: Further Comments**

Fermanagh and Omagh District Council (Council) welcomes the opportunity to respond to the Education Authority's public consultation on the Online Application process for Home to School Transport Assistance.

The Council recognises that the Education Authority has a key role to play within the District, particularly in relation to delivering the long-term Community Planning Strategy for the District and looks forward to working together as key Statutory Partners.

### **Timeframes**

Fermanagh and Omagh District Council believes that the timeframe for response to the Consultation Documentation is very short, and may present barriers to some individuals and groups who wish to respond. The fact that the online application service for Primary School applications will be available from Tuesday, 2 May 2017 – means that the online application process will have commenced before this consultation process has been completed.

Although, the Education Authority states that most applications are associated with post-primary school pupils, there should be an adequate amount of time for responses from the parents/guardians of all children and not just those of post-primary school age.

Council would recommend that it would be beneficial for all involved (Education Authority, parents, guardians, transport providers), if the updated Application Procedures were introduced for the school-year beginning September 2018 – this would allow for adequate consideration of the response to the current consultation process, as well as allowing for the adequate promotion of any new procedures being introduced.

### **Online Applications vs Traditional Applications**

The Council, overall, agrees with the aim of the Education Authority in terms of increasing the availability of online resources. This will not only allow individuals to access as many services as possible online, but it also allows individuals to access services and information more quickly, easily, and at a time/place which is more convenient to them.

However, Fermanagh and Omagh District Council believes that the retention of 'paper applications', or 'traditional applications', is vital for rural areas and should continue to be made available going forward. There are many reasons why this acceptance of 'traditional applications' should be accepted and these will be explored within this Consultation Response.

## **Potential Compromise Approach**

The Council believes that it may be beneficial for the Education Authority to adopt an approach similar to that of the Department for Agriculture, Environment and Rural Affairs.

The Department (then DARD) consulted in January 2016 for the 'use of online as the primary channel of communication and transaction between DARD and its customers.'

As part of this consultation, the Department made provisions that 'Hardcopy' CAP Single Application Forms would be issued to customers who had **not** previously submitted their application online.

The Education Authority could take a similar approach – allowing those who cannot access the Online Application to complete paper copies, whilst encouraging those who can apply online, or have applied online in the past, to do so again.

## **Rural Communities and Access to Broadband**

Over the last number of years, the Council believes that there have been several decisions which have proved detrimental to rural communities.

Some of these decisions revolve around the availability of broadband and the absence of proper consideration of the consequences for rural dwellers.

The Fermanagh and Omagh District, as well as Northern Ireland as a whole, requires major investment in relation to Digital Infrastructure. In February 2017, OFCOM announced that the average speed for Broadband in the UK was 28.9Mbps.

Over the last number of years, OFCOM reports have demonstrated that the average Broadband speeds across the UK have been increasing (e.g. February 2015 - 22.8 Mbps and May 2014 - 18.7Mbps).

Currently within the Fermanagh and Omagh District there are very few areas where broadband speeds are greater than the UK average as per ThinkBroadband speed tests ([www.thinkbroadband.com](http://www.thinkbroadband.com)) last updated in April 2017.

Indeed the two major urban centres of the District, both Enniskillen (26.51Mbps [approx.]) and Omagh (18.18 Mbps [approx.]) also receive substantially slower Broadband speeds than the UK average.

Other example areas within the Council District, include:

- Maguiresbridge - 1.82Mbps [approx.]
- Wattlebridge – 1.69Mbps [approx.]
- Altamuskin – 1.62Mbps [approx.]

Therefore, the evidence base clearly demonstrates that rural areas within the Fermanagh and Omagh District are extremely disadvantaged when it comes to Broadband availability, provision and speed – some areas within the District (as outlined above) have almost no Broadband coverage whatsoever.

It is imperative that in considering the introduction of an 'Online Only' Application the Education Authority need to consider and explore the specific impacts upon rural dwellers within the District.

The Council believes that with the Digital Infrastructure within the District being very inconsistent, the Education Authority should **not** move to an 'Online Applications Only' approach.

### **Education Authority Objectives**

The Council believes that the new 'online' process, as outlined within the Consultation Documentation, does meet the stated objectives. However, there are several other issues which need to be explored in relation to the provision of 'Online Applications' rather than simply 'meeting the stated aims and objectives'.

The Council notes the key reasons as to why this Online Application process is being introduced:

1. To comply with the Programme for Government commitments, particularly the new Digital Transformation Service (DTS).
2. To provide an innovative and cost effective approach to applying for 'Home to School Transport'.

However, there is no mention of providing customers (or applicants) with a better/improved service. The Council believes that any changes to service delivery, or the application process, should be undertaken with the customer (and other key individuals) in mind. Customers, and applicants, should be central to this process – ensuring that any new procedure does not place groups of people at a significant disadvantage.

It is also clear that individuals who will be applying for 'Home to School Transport' are from varying age groups, socio-economic backgrounds, marital status and educational backgrounds. The Council believes that not all applicants would be from a background that necessitates a knowledge of computers and/or online communication – therefore other methods of application should be made available.

The Council acknowledges that the Education Authority does provide some assistance (in terms of a telephone helpline, being able to access a computer at a local resource centre) however, it also worth bearing in mind that both public transport and mobile phone coverage in rural areas may not be as reliable as more urban areas.

The Council would also highlight the implications of the various court cases, involving HMRC and their 'Mandatory Online Filing'. HMRC did not provide any exemptions for older people, people with disabilities or those living in parts of the country which are too remote for broadband access – and as such this was deemed unlawful as a breach of an individual's Human Rights.

### **Assistance / Guidance Available**

The Council recognises that the Education Authority is providing a level of assistance and guidance for its customers, including: the telephone helpline and access to a computer terminal in local Resource Centres.

Although the Council feels strongly that paper-based applications must be retained, it is vital that the Education Authority continues to provide the service assistance outlined within the consultation documentation going forward.

### **Communication Arrangements**

The Council does not agree that the 'Communication Arrangements' outlined within the Consultation Documentation are completely satisfactory.

The Council agrees that that the relevant sections of the Education Authority's webpages should be updated accordingly, as well as information being inserted to School Transport Information Leaflets and Schools Admissions Booklets.

However, the Education Authority should take a more proactive approach to promoting this new process. This proactive approach could entail:

- Advertisements/press releases in local newspapers.
- Targeted social media posts.
- Sharing information with all schools allowing local schools to distribute the information, in a way which suits their locality, to the parents and guardians of new starts.

This proactive approach to advertising is particularly relevant due to the short timescales outlined within this consultation. Potential applicants do not have much time before they are expected to apply.

If the revised timeframes for rollout is accepted, i.e. to begin with the enrolments for September 2018, it would be beneficial for the Education Authority to develop a full Communications Strategy with key targets groups, and timeframes

## **Special Transport Need**

The Council notes that within the Education Authority's consultation documentation, it is stated that this application process does not apply to 'Special Transport Need'.

Although the Council feels that the 'Online Only' application process is not suitable, and that a paper based application process should be retained, it is important that parents/guardians who may be applying for a Special Transport Need receive support – and benefit from new technological developments as well.

## **Eligibility for 'Home to School' Transport**

The Council also recommends that the Education Authority should review the policy in relation to pupil eligibility for 'Home to School' transport.

For those families who live at a distance which is less than the Statutory Qualifying Distance from their school, it would be worthwhile to make available concessionary seats for their children. This could assist families logistically and financially, by offering a cost-effective method of school transportation.

## **Conclusion**

Fermanagh and Omagh District Council recognises that the introduction of 'Online Applications' is a significantly positive step in terms of customer service and cost efficient savings.

However, the Council strongly recommends that the Education Authority permits 'paper applications' to be made, as well as the online method of application. Not only will this improve the customer service offering of the organisation, but it will also allow the Education Authority to accommodate all parents/guardians, regardless of their backgrounds or whether they live in an urban or rural area.

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### Freedom of Information

The Education Authority will publish a summary of responses following completion of the consultation process.

The closing date for responses to this consultation will be:

Monday 8th May 2017 at 4.00pm

Unless individual respondents specifically indicate that they wish their response to be treated in confidence, their name and the nature of their response may be included in any published summary of responses. Respondents should also be aware that the Authority's obligations under the Freedom of Information Act may require that any responses not subject to specific exemptions under the Act, be disclosed to other parties on request.

Further information about the consultation process is available at <http://www.eani.org.uk/consultations/> or by e-mail to [equality@eani.org.uk](mailto:equality@eani.org.uk)

During any consultation exercise, identifying the target audience is important and will affect the methods used to consult and the information produced for stakeholder groups. Consultation also means effectively consulting with those who are representative of the local community and those who use the services provided by the Education Authority. This includes hard-to-reach groups in line with the EA Equality Scheme. Specific efforts will be needed to ensure the consultation reaches groups in the format that best meets their needs, for example, the consultation documentation will be made available upon request, in other languages for those not fluent in English, and/or in braille or larger print.

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