

Merthyr Tydfil County Borough County Efficiencies Consultation: Phase 1

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UCAC | yr undeb sy'n diogelu athrawon a darlithwyr Cymru

Merthyr Tydfil County Borough Council Efficiencies Consultation: Phase 1

UCAC welcomes the opportunity to respond formally to Phase 1 of Merthyr Tydfil County Borough Council's consultation on efficiencies. UCAC is a trade union that represents 250 educators within the County Borough.

We urge the Council to ensure that any further steps in this consultative process are undertaken on the basis of clear communication and thorough, meaningful consultation.

This response concentrates on Proposal 12 (Appendix 12) relating to 'School Transport Post 16 Provision.' The consultation document recommends discontinuing post-16 home to school or college transport. Although UCAC understands the urgent need for Local Authorities to make savings, we firmly oppose this particular proposal.

1. Statutory duty to assess learner travel needs

The Learner Travel (Wales) Measure 2008, clause 2(2) places a statutory duty on Local Authorities to:

"...assess the learner travel needs of their area for the following academic year."

This duty applies to learners:

- up to 19 years old, and learners aged 19 and above if they have already begun a course of education or training before reaching that age (clause 2(1))
- who are ordinarily resident in the authority's area (clause 2(3))

1.1. Learners in the Welsh-medium sector

The consultation document states that "As of September 2013, there were no longer any sixth form admissions to secondary schools within the County Borough."

The document makes no reference whatsoever to the fact that learners from the County Borough who wish to receive their secondary education through the medium of Welsh, including post-16 education, have to travel out-of-county to receive that education – specifically to Ysgol Gyfun Rhydywaun, in Rhondda Cynon Taff County Borough Council.

The travel needs of these learners are clearly within the parameters of the Local Authority's statutory duty. In failing to acknowledge the existence of this group of learners in its appraisal of the possible advantages or disadvantages of the proposal, UCAC is of the opinion that the Local Authority has neglected its statutory duty under clause 2(2) of the Learner Travel (Wales) Measure 2008.

1.2. Learners at risk of becoming NEETs

On page 91 of the consultation document, there is an appraisal of the initial long list of options for Proposal 12.

UCAC feels very strongly that the simplistic phrase "Possible impact on NEETS" falls very far short of the kind of impact assessment that we would expect in terms of the effects of the proposal on the lives of this group of vulnerable learners.

There is a lengthy list of questions that we believe would be essential to any kind of impact assessment or background research to such a proposal to discontinue free transport. For example:

- How many young people would drop out of education if there were a charge for transport?
- What would be the implications – both for the young people, and for the public purse – were they to drop out of education or training? Would they join the already all too numerous ranks of the NEETs in the Authority?
- What would be the threshold that would impede young people from making the journey? Is there any possibility of requiring a contribution without charging the full price?
- Has any consideration been given to providing free transport to those learners who receive the EMA on the basis of limited family income?

The lack of consideration of such matters reinforces the opinion expressed in 1.1 . above that the Local Authority has neglected its statutory duty under clause 2(2) of the Learner Travel (Wales) Measure 2008, and that the factual and analytical basis of the consultative process is therefore flawed.

2. Statutory duty to promote access to education and training through the medium of Welsh

Clause 10 of the Learner Travel Measure states that:

"Each local authority and the Welsh Ministers must promote access to education and training through the medium of the Welsh language when exercising functions under this Measure. "

This duty is reinforced in Strategic Objective 1.9 of the Welsh Government's Welsh Medium Education Strategy:

*"To promote access to Welsh-medium statutory primary and secondary provision, **and to institutions providing further education** and nursery education, when exercising functions under the Learner Travel (Wales) Measure 2008"*

We see no evidence in the consultation document that consideration has been given to this statutory duty.

In fact, cutting free transport could have a severely negative effect on learners who chose to receive their post-16 education through the medium of Welsh – and on the Welsh-medium sector more generally in the area.

UCAC is convinced that discontinuing free post-16 transport would result in a significant number of learners choosing no longer to undertake the journey, and turning instead to a local Further Education College. A quick survey of the prospectuses and websites of The College Merthyr Tydful, Coleg y Cymoedd and Bridgend College revealed no Welsh-medium courses at two of the colleges, and limited or partial opportunities at the other (apart from a GCSE and an A Level course in Welsh as a subject). Learners would therefore be compelled to abandon Welsh-medium education and receive their education through the medium of English – against their own wishes, and disrupting the linguistic continuity of their education.

There is no way in which this kind of decision could be interpreted as 'promoting access to education and training through the medium of Welsh.'

As part of any consultation which considers such a damaging proposal, UCAC firmly believes that the Local Authority should conduct an impact assessment of the effects of the proposal on the Welsh-medium sector, within the Authority, and across the broader region. We are confident that any such assessment would show that cutting free post-16 transport would raise the following serious questions:

- a) the sustainability of the sixth form of the Welsh-medium secondary school: would the school be able to continue its post-16 provision if numbers were dramatically reduced as a result of the proposal?
- b) the sustainability of the Welsh-medium secondary school itself: would the whole school be sustainable if it were to lose its sixth form?
- c) the effect on the sector as a whole: will parents continue to be willing to send their children to Welsh-medium schools (primary or secondary) if they know that there is no continuation of the provision post-16?
- d) the effect on the flow of students into Welsh-medium Higher Education, under the auspices of the Coleg Cymraeg Cenedlaethol

3. Equality

In addition to the Learner Travel (Wales) Measure 2008, the Welsh Government document 'Home to School Transport' (April 2008) refers in paragraphs 1.28-9 to the need to be aware of equality legislation, including the Welsh Language Act 1993 in making school transport arrangements.

UCAC would make the argument that this proposal undermines the equal opportunity of every family to gain access to post-16 education for their children, and to gain access to Welsh-medium post-16 education. The proposal gives a clear advantage to families who can afford to make their own travel arrangements, or pay for transport – or those who live closest to the provision.

We would like to draw your attention to the fact that the proposal disproportionately affects learners who choose to receive their post -16 education through the medium of Welsh. The reason for that is that the distances that learners have to travel are on average considerably greater because of the necessity to travel out-of-county. There are two damaging, and discriminatory, side-effects to this:

- i. greater transport costs
- ii. awkward, time-consuming journeys by public transport which may not be compatible with school timetables e.g. is it possible for learners to arrive at school on time by means of public transport? How many different buses or trains would be involved in the journey?

The consultation document makes no reference to an assessment of these factors. Consequently, the appraisal exercise appears deficient, and possibly invalid.

4. Effect on jobs

UCAC is committed to safeguarding jobs and protecting the conditions of teachers and lecturers. In that context, we believe that the cut to post-16 transport would be damaging. Without a doubt, discontinuing transport for learners from Merthyr Tydfil to Ysgol Gyfun Rhydywaun would have a detrimental effect on jobs at that school.