

# Report of the Enterprise and Learning Committee's scrutiny inquiry on the Draft Learner Travel (Wales) Measure

## 1. Introduction

The Assembly Government made a statement on the draft Learner Travel (Wales) Measure in Plenary on 26 June 2007. The draft Measure went out to consultation, which closed on 28 September.

On the 11 July 2007 the Committee agreed to undertake a pre-legislative scrutiny inquiry of the draft Learner Travel (Wales) Measure and take evidence from key stakeholders during the autumn term. Findings will be presented to the Deputy First Minister.

The scope of the National Assembly's powers to pass legislation on a particular matter is set out in Part 3 and Schedule 5 of the Government of Wales Act 2006. In the case of learner travel, the National Assembly is permitted to make Measures for the 'the travel of persons receiving primary, secondary or further education or training to and from the schools or other places where they receive it'.

In general terms, this gives the National Assembly the scope to legislate for travel to school, and for post-16 learners, as currently established by the Education Act 1996 (as amended). The National Assembly gained this power from the National Assembly for Wales (Legislative Competence) (Conversion of Framework Powers) Order 2007 which converted the powers in sections 178 and 179 of the Education and Inspections Act 2006 into amendments to Schedule 5 to the Government of Wales Act 2006. There are restrictions on the National Assembly's scope to make a Measure for learner travel. The National Assembly **cannot legislate** for matters which are the responsibility of the Department of Transport such as, for example, vehicle standards and licensing, vehicle inspection, seating arrangements such as the '3 for 2 concession', seatbelts, and driver licensing.

## **2. Scrutiny**

The Committee held three scrutiny sessions where it took oral evidence from key stakeholders, which also provided written evidence.

### **26 September 2007: Education Bodies**

Fforwm

Association of School and College Leaders (ASCL) Cymru

National Association of Headteachers (NAHT) Cymru

Governors Wales

Welsh Secondary Schools Association (WSSA)

### **3 October 2007: Parents and Users**

Children's Commissioner

Belt up School Kids (BUSK)

Stuart's Campaign

Rhieni dros Addysg Gymraeg (RhAG)

### **10 October 2007: Transport Providers, Local Government and the Welsh Assembly Government**

Association of Transport Co-ordinators (ACTO)

Confederation of Passenger Transport (CPT)

Welsh Local Government Association (WLGA)

Ieuan Wyn Jones AM, Deputy First Minister and officials

The Committee also noted papers submitted by SUSTRANS, the National Autistic Society, Funky Dragon and CYDAG.

### 3. Analysis of the Evidence

#### 3.1. Age/Distance Model

The draft Measure proposes to provide free transport to all children in primary education if they live two miles or more from the nearest suitable school. For secondary school children, the draft Measure maintains the current three mile distance limit.

This proposal received broad support. Governors Wales<sup>1</sup>, the Welsh Secondary Schools Association (WSSA)<sup>2</sup>, the Children's Commissioner<sup>3</sup>, the Association of Transport Coordinating Officers (ATCO)<sup>4</sup>, the Confederation of Passenger Transport Cymru (CPT Cymru)<sup>5</sup> all expressed support and no witnesses expressed opposition to the proposals in the Measure. However, in their oral evidence to the Committee RhAG recommended a review of the three-mile travel distance boundary to secondary school arguing that its reduction to two would address misbehaviour on service buses.<sup>6</sup>

The National Autistic Society (NAS) expressed concerns about the lack of provision for free transport for pupils with mobility difficulties living within the statutory walking distance to their school.<sup>7</sup>

#### 3.2. Discretion of Local Authorities to make travel arrangements

The Measure permits local authorities to continue to use their discretion to provide free or subsidised transport, for example, to Welsh medium and denominational schools. (Section 5) RhAG argued that this places Welsh schools at a disadvantage to English medium.<sup>8</sup> It suggested that the designation of a "suitable school" (section 3(6)) should apply to both English and Welsh medium schools where there are a network of designated Welsh medium schools.<sup>9</sup> The Committee received further written evidence to this effect from CYDAG.<sup>10</sup>

Governors Wales, the Children's Commissioner and ATCO all expressed support in their submissions for retaining the status quo. CPT Cymru is of the view that discretions proposed by local authorities should be subject to approval by Welsh Ministers.

The WLGA agreed with retaining discretion and told the Committee that this issue needed to be considered in the same context as planning school places. Councillor John Davies clarified:

it is about parental preference and not parental choice, and there is a subtle difference in that respect. There will be opportunities, quite rightly, to provide Welsh-medium or

<sup>1</sup> EL (3) 04-07 (p.2), Governors Wales, Evidence on the Draft Learner Travel (Wales) Measure

<sup>2</sup> EL (3) 04-07 (p.1), WSSA, Evidence on the Draft Learner Travel (Wales) Measure

<sup>3</sup> EL (3) 05-07 (p.1), Children's Commissioner for Wales, Evidence on the Draft Learner Travel (Wales) Measure

<sup>4</sup> EL (3) 06-07 (p.1), ACTO, Evidence on the Draft Learner Travel (Wales) Measure

<sup>5</sup> EL (3) 06-07 (p.2), CPT, Evidence on the Draft Learner Travel (Wales) Measure

<sup>6</sup> Enterprise and Learning Committee, Committee Transcript, 3 October 2007, para.85 <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agens/ei20071003qv.pdf?langoption=3&ttl=EL%283%29-05-07%20%3A%20Transcript%20%28PDF%2C%20215kb%29>

<sup>7</sup> EL(3) 06-07(p.5) *Proposal for a Learner Travel (Wales) Assembly Measure: A Response from the National Autistic Society Cymru.*

<sup>8</sup> EL (3) 05-07 (p.2), RhAG, Evidence on the Draft Learner Travel (Wales) Measure.

<sup>9</sup> Op.Cit., Transcript, 3/10/07, para.71

<sup>10</sup> CYDAG Evidence.

denominational provision, but it is scattered; the provision in Powys and Pembrokeshire is a classic example of that. Therefore, the discretion must lie with the authority in terms of transport being available to travel to school A rather than to school B, because you also have to consider the issue of capacity in those schools. Sometimes, if parents choose to send their children to school A, there may not be places there, but there may be places in school B that is providing denominational or Welsh-medium education. Therefore, you have to have that discretion. It is about being able to make a decision locally.<sup>11</sup>

The WLGA argued that what parents might consider to be their first choice is not always reasonable in terms of the other elements of providing education. What is important is that school transport is **available** for providing denominational or Welsh-medium education.

Some Members raised the retention of discretion with the Deputy First Minister when he appeared before the Committee. It was explained that if a right to transport to the nearest Welsh-medium school were extended, it would have to be done for English-medium schools all over Wales. Some schools are not clearly designated as Welsh medium or English medium, so it would affect school organisation in various parts of Wales.<sup>12</sup> A fuller explanation of the legal position was provided by the Deputy First Minister and can be seen in **Annex 1**.

### **3.3. Safe Routes and Travel Arrangements**

During the scrutiny process concerns were raised about how a “safe route” is defined and the lack of consistency in how it is defined between different local authorities. Written evidence from the office of the Children’s Commissioner made reference to this<sup>13</sup> and they told Members that improved guidance could help to clarify a “safe route”.<sup>14</sup> BUSK argued that it was necessary “to establish what a safe journey is”, arguing that vehicles that do meet a certain standard do not provide safe learner travel arrangements.<sup>15</sup> WSSA said that the location of schools can vary considerably, and it would be useful if LEAs were able to give guidance on what might constitute a potentially dangerous journey to school. SUSTRANS Cymru would like every child in Wales to have a right to a safe route to school.<sup>16</sup>

### **3.4. Codes of Conduct**

The draft Measure states that Local Authorities must make a Code of Conduct (“the Code”) for behaviour on buses after consultation with schools, further education institutions, parents and learners. (Section 10). The Code will be therefore be enforced by giving a head teacher the power to impose sanctions for incidents by virtue of them coming within the scope of a school’s behaviour policy (Sections 11 & 12). Under the Education and Inspections Act 2006,

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<sup>11</sup> Enterprise and Learning Committee, Committee Transcript, 10 October 2007, para.135 <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=61711&ds=10/2007>

<sup>12</sup> Ibid., para.227

<sup>13</sup> Op.cit., Children’s Commissioner, para. 4

<sup>14</sup> Op.Cit., Committee Transcript, 3/10/07, paras.50-52

<sup>15</sup> EL(3) 05-07 (p4) Busk, Evidence to the Education and Learning Committee on the Draft Learner Travel Measure.

<sup>16</sup> EL (3) 05-07 (p.6), SUSTRANS, Evidence on the Draft Learner Travel (Wales) Measure

the behaviour policy can include pupil conduct outside the school premises. The draft Measure proposes to amend this Act so that incidents on buses are included.

#### 3.4.1. The Principle

All witnesses were broadly supportive of the principle of a Code of Conduct.

#### 3.4.2. Enforcement

However, there were diverging views on the enforcement of the Code. The teaching bodies tended to oppose the Head having the responsibility for enforcement. Evidence submitted jointly from NAHT and ASCL stated:

At the moment, headteachers work to support the LEA, and any information that school staff gain is available to the LEA. However, as the LEA is the contractor and has the responsibility, it takes that final action. The final sanction is to refuse permission for the child to travel on the bus. That already happens. Our concern is that the Measure, as it is worded at the moment, would pass a lot of extra responsibility to the headteacher without any additional powers to fulfil it. It is totally out of the control of the school staff.

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They suggest that section 10 (7) of the Measure is amended to make reference to “designated member of staff with delegated responsibility for transport matters”.<sup>18</sup> WSSA said that schools feel that full responsibility for enforcement should not lie with the head, partly for legal reasons because the contract is between the local education authority and the transport providers, and because this behaviour takes place out of school.

Other bodies saw the logic of the heads taking responsibility for enforcement. Stuart’s Campaign agreed that headteachers are best placed to enforce discipline but felt that there was a lack of clarity in the draft Measure as it stood as between the schools which are responsible for discipline and the local authorities which remain responsible for the operation of the contract.<sup>19</sup> The office of the Children’s Commissioner told the Committee that Codes should be drawn up in schools in consultation with pupils. This would confer a sense of ownership and it would be appropriate for heads to enforce them. CPT Cymru agreed that headteachers should enforce the Code in the first instance.

The WLGA argued that the current relationship between LEAs and governing bodies allows the delegation of certain responsibilities in respect of the contract. Enforcement of the Code would need clear delegation to headteachers.

Some witnesses noted that giving powers of enforcement to headteachers would have a knock on effect on other areas of their work. Dr Chris Howard from Stuart’s Campaign, who is also a headteacher, explained that as the Measure states that the head may take action through excluding a pupil from school and from transport to school:

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<sup>17</sup>EL(3) 04-07(p.4), Evidence from NAHT/ASCL para.3.

<sup>18</sup> Ibid., para.2

<sup>19</sup> Op.cit, Stuart’s Campaign, para.10

That means that there would be an appeal under the exclusion procedures, and, if you do not know, I can tell you that appeals under exclusions procedures have multiplied tenfold or maybe twenty-fold in the last 10 years. You can hardly exclude for any period of time these days without having a formal hearing. That is not only an administrative burden, but an emotional one on headteachers. Due to the way that it is drafted, it is the headteacher who would have to prosecute the case before the complaining parent and maybe their legal representative. It is the school governing body that would have to referee and adjudicate the case and I think that that is a step beyond for lay people on school governing bodies. It would be far better if you just retained the power and the sanction with the local authority as the contracting party working with headteachers.<sup>20</sup>

NAHT and ASCL saw difficulties where sanctions are imposed on pupils as a result of the LEA giving guidance to the head to the effect that it thinks that sanctions should be imposed, then, when an appeal comes in, the head and the governing body are in a difficult position. They would have no evidence; they would have simply been directed by the LEA.<sup>21</sup>

What emerged overwhelmingly in the evidence from a range of witnesses was the lack of clarity in where responsibility lies in law as it stands **currently**, as well as in the draft Measure. BUSK and CPT in particular stressed that often LEAS, operators, drivers and schools did not seem to know where responsibilities lie and that often there was insufficient capacity and expertise within local authorities.

Dr Chris Howard drew Members' attention to a Department for Transport consultation on the use of seat belts and child restraints which spells out quite clearly that the legislation governing the control of children and adults misbehaving on school transport places a duty of care on the three parties to the contract, namely the school, the local authority as the contracting authority, and the contractor, which is the bus company. He told us:

A huge difficulty, which, quite honestly, the Learner Travel Measure tries to resolve, is the fact that, although the law is clear, hardly anyone who is operating under that law seems to know what it is. Five years down the line, despite the high-profile campaigns that we, BUSK and the Assembly Government have been engaged in, in this part of the UK, those things still happen, and you still get bus drivers saying that this is the school's responsibility and school clerks saying, 'It has nothing to do with us'. I can tell you, anecdotally, that in a constituency not far from here, a parent was told three weeks ago by a transport official that misbehaviour on school buses was nothing to do with the local authority.<sup>22</sup>

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<sup>20</sup> Op.cit., Committee Transcript, 3/10/07 para.143

<sup>21</sup> Enterprise and Learning Committee, Committee Transcript, 26 September 2007, para.240 <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas/el070926qv7.pdf?langoption=3&ttl=EL%283%29-04-07%20%3A%20Transcript%20%28PDF%2C%20171kb%29>

<sup>22</sup> Op.Cit., Committee Transcript 3/10/07, para.141

### 3.4.3. Coverage

We heard similarly diverging views on the coverage of the Code of Conduct. Stuart's Campaign, NAHT/ASCL and CPT all believe that the Code of Conduct should be Wales wide but ATCO and the WLGA believe that local authorities should have discretion. Stuart's Campaign, noted that with more diverse arrangements for transport – for example as a result of 14-19 Learning Pathways – strengthened the rationale for having an all-Wales approach.<sup>23</sup>

The WLGA agreed that the Code should be a national requirement but argued that operationally it should be regional and good practice was already in place where it had developed in a bottom up way which ensured local ownership.

Some witnesses expressed concerns about the difficulties of operating different Codes of Conduct on a bus where there were pupils from more than one school or local authority area.

### 3.4.4 Other modes of transport

During the course of taking evidence the issue of extending the Code of Conduct to pupils not on school buses was raised by Members and witnesses. This was both in the context of pupils travelling on service buses and those travelling to schools by other means.

With regard to the former, section 1(2) of the draft Measure explains that the travel arrangements that come within the scope of the Measure include transport provision where the authority pays for the whole or any part of a person's reasonable travel expenses, or pays allowances in respect of the use of particular modes of transport. So, if a person travels on a general service bus and the local authority pays for the ticket, that comes within the scope of the travel arrangements outlined in the Measure, and that would therefore fall within the scope of the supervision and discipline arrangements.

With regard to other modes of travel, the office of the Children's Commissioner told the us that s.175 of the Education Act 2002 deals with a duty on schools in regard of 'welfare of children' which "must surely encompass their behaviour, and their safe travel to and from school. So, that duty already exists for schools, and it is one that is being debated within the teaching profession at the moment. I do not think that there is a clear answer, but it is an important point—the school has a responsibility on that."

The Committee received a letter from the CPT subsequent to the meeting when their evidence was heard which can be seen in **Annex 2**. It **expressed concern about** the legal advice given in the meeting that the Measure will also apply to learners travelling on non-school contract services where their travel is either paid for by the LEA (**Annex 3**). According to that advice, the behavioural code will apply equally to learners on non-school contract services where their travel is paid for by the LEA. The CPT concluded that in that case there would be great confusion and unacceptable burdens on operators and, even more so, on drivers because some pupils on those buses would be subject to the Code of Conduct whilst others, for whom travel arrangements would not be made by the LEA, would not be subject to the same Code.

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<sup>23</sup> Ibid,

### **3.5. Changes to Start & Finish times**

There was broad support for this proposal from most witnesses. The Children's Commissioner argued that it is "logical" that local authorities are given the power to vary school session times as they assess the need for learner travel and told the Committee that here the Measure had been drafted "in a sensible way". However, it was questioned whether the system would work in rural areas and that arrangements would need to be kept under review.<sup>24</sup> WSSA, Stuart's Campaign, ATCO and the WLGA expressed support. CPT Cymru stated that Welsh Ministers should be prepared to direct schools in this matter having expressed doubts about the will of some stakeholders to co-operate.<sup>25</sup> CPT further added that the economies of scale delivered by the policy would offer significant savings and better-quality vehicles, "because the more work that you have out of the vehicle, the better it is for the operator and the more efficient it is for the client."<sup>26</sup>

However, Governors Wales are opposed to giving the power to local authorities and believe that it should be retained by Governing Bodies. They drew the Committee's attention to the recommendation in the former Education and Life Long Learning Committee's Report which stated:

"We feel that LEAs should take the lead in identifying clusters of schools where such collaboration would be effective. It would then be a matter for school governing bodies to agree, in consultation with teachers and parents".

Governors Wales said they would be content with this recommendation.

All bodies were agreed, however, that staggered times would only work if there was full and proper consultation and co-operation between all the relevant stakeholders.

### **3.6. Co-operation**

Section 15 of the draft Measure requires governing bodies to give local authorities "any information or other assistance that is reasonably required by them for the performance of their functions under this Measure" and for local authorities to co-operate with each other. Evidence from the Children's Commissioner expressed a hope that the requirement to collaborate will "improve co-ordination of learner transport."<sup>27</sup>

### **3.7. Transport for post-16 learners and children in nursery education**

The WLGA gave a cautious welcome to the additional powers in post-16 education and nursery education. However, it wants to ensure that there is sufficient consultation with local authorities before addressing issues to do with transport for nurseries and post-16 education. Both the Deputy First Minister and the WLGA stressed to us the need to look at the outcomes

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<sup>24</sup> Op.Cit., Children's Commissioner., para. 6

<sup>25</sup> Op.cit, CPT, para.12

<sup>26</sup> Op.cit., Committee Transcript, 10/10/07, para.14

<sup>27</sup> Op.cit., Committee Transcript 3/10/07, para.7



of the pilot projects that are currently under way in Bridgend and the north, which are looking at half-fare concessions for post-16 learners.<sup>28</sup>

RhAG's evidence to the Committee touches on both of these. It wished any arrangements for nursery education to place Welsh medium provision on a level footing with English medium. With regard to post-16 education, RhAG is concerned that current local authority proposals to cut post-16 transport is placing Welsh medium provision under threat.<sup>29</sup>

Fforwm told us that the definition of 'suitable institution' is something that they would like to see addressed. It is not necessarily the case that suitable provision is found at the institution closest to home. The definition of what is appropriate or suitable must really centre on the learner.<sup>30</sup>

### **3.8. Promotion of Sustainability**

The draft Measure requires that local authorities "must promote" sustainable modes of travel. Some witnesses, including Governors Wales and WSSA argued that environmental issues should not override educational issues.

Stuart's Campaign thought that the promotion of sustainability would lead to an improvement in bus stock.

SUSTRANS Cymru said that the Measure would benefit from a more positive approach to the contribution walking and cycling could make to tackling the school run, and a pro-active strategy to increase levels of active travel.

### **3.9. 14-19 Education: Learning Pathways**

In the course of scrutiny of the draft Measure Members and witnesses raised concerns that the Measure did not fully address the emerging context of 14 to 19 education which can involve pupils moving between sites during the day.

The acting Children's Commissioner told the Committee that more consideration needed to be given to "places of learning" as agenda is much wider than just schools, encompassing work-based and vocational learning that might take place at an employer's premises. There was a need for the Measure to be "future-proofed" to take 14-19 Learning Pathways in to account.

Dr Chris Howard of Stuart's Campaign suggested that the Measure should be drafted to cover the fact that there will be contractors other than the local authority, and they may use buses, coaches, minibuses, or taxis. However, there would still need to be a minimum standard on all that provision within the law.

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<sup>28</sup> Ibid., para.308 and para.175

<sup>29</sup> Op.Cit., RhAG Evidence, paras. 2&3

<sup>30</sup> Op.cit., Committee Transcript 26/09/07

Fforwm told us that the the Measure should be re-drafted to state that the 14-19 pathways partnerships are to be included in the planning process or are perhaps in control of the planning process for that age group.<sup>31</sup>

The Deputy First Minister told us that travel during the school day is not proposed to be included in the Measure.<sup>32</sup>

### 3.9. Criminal Record Bureau Checks

The law does not currently require employers to make CRB checks on school bus drivers and escorts. Employers have the discretion to commission checks and some LEAs require transport operators to make CRB checks as a condition of the home to school transport contract. However, the Welsh Assembly Government encourages LEAs to ensure that CRB checks are carried out on all staff employed on contracted school transport services as a matter of good practice. The checks required, and how they are arranged, should be set out when LEAs enter contracts with transport operators.

The Welsh Assembly Government has issued guidance to employers on preventing unsuitable people from undertaking any role with children and young persons in the education service.<sup>33</sup> It outlines the details of the pre-appointment checks that should be made on all staff who will have contact with children.

The Safeguarding Vulnerable Groups Act 2006<sup>34</sup> includes arrangements that will effect CRB checks for home to school transport. The Act makes enhanced level CRB checks mandatory for persons who drive a vehicle for the purpose of conveying children or any person supervising or caring for them. Thus, drivers of dedicated school buses, taxi drivers, and escorts will have to be CRB checked. This will come into force next year. We were told by the Assembly Government that this is why CRB checks were not included in the draft Measure.<sup>35</sup>

Both CPT and ACTO drew the Committee's attention to inconsistency in carrying out CRB checks throughout Wales. ACTO noted that the DVLA had announced a consultation, in which one proposal involves CRB checks on all licence applications when they are processed. This would centralise the process at a stroke and provide consistency.<sup>36</sup>

### 3.10. Procurement

We heard compelling evidence about the importance of procurement in ensuring the provision of good quality and safe school transport. Moreover, witnesses made an explicit link between the quality of the transport and behavioural issues. Gney Mehta's evidence to the Committee, in particular, highlighted this experience.<sup>37</sup>

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<sup>31</sup> Ibid., para.155-56

<sup>32</sup> Op.Cit., Committee Transcript, 10/10/07, para. 309

<sup>33</sup> Welsh Assembly Government, Circular 34/02, 'Child Protection: Preventing Unsuitable People from Working with Children and Young Persons in the Education Service, October 2002.'

<sup>34</sup> Safeguarding Vulnerable Groups Act 2006 (Chapter 47) <http://www.opsi.gov.uk/ACTS/acts2006/60047--h.htm>

<sup>35</sup> Op.cit., Committee Transcript, 10/10/07, para.271

<sup>36</sup> DVLA, *Improving Bus Passenger Safety through the Vehicle Licensing System*, Consultation Paper, September 2007.

[http://www.dvla.gov.uk/media/pdf/consultations/cons\\_190907.pdf](http://www.dvla.gov.uk/media/pdf/consultations/cons_190907.pdf)

<sup>37</sup> Op.cit., Committee Transcript, 3/10/07 para. 120-123

ACTO told the Committee “**the procurement regime which local authorities must comply with acts against some of the Measure’s objectives**”.<sup>38</sup> For example, local authorities are obliged to obtain the best value for money and, by giving children season tickets and putting them on service buses—buses that are already operating as opposed to putting out a new contract—they are achieving value for money. They are helping to support some services which otherwise would not operate by putting season ticket revenue into that particular operator.

BUSK told the us that risk assessments are not always carried out on modes of transport and that short term contracts discourage operators from investing in modern, quality vehicles.<sup>39</sup> The CPT also explained that that using a bus that receives fuel duty rebate is far more cost efficient for the operator and the local authority. If a service is “a closed-door service” there is no fuel duty rebate, because the parameters for that are that the service must be available to the general public.<sup>40</sup>

Stuart’s Campaign said that a standard tender document should be implemented by the 22 local authorities to ensure a common standard throughout Wales.<sup>41</sup>

The Welsh Assembly Government is currently considering responses to its consultation on its non-statutory Guidance on Home to School Transport.<sup>42</sup> The draft Guidance, an extract of which is set out in Box 1 below, shows that the Assembly Government is aware of the case for raising procurement standards. However, as non statutory Guidance it is not binding on local authorities.

### Box 1

In many parts of Wales the core of home to school transport arrangements are dedicated contracts between LEAs and transport operators. LEAs may enter secure value for money and should adhere to procurement best practice.

There is a balance to be struck between the length of contract, the quality of vehicles that a contractor offers and the training opportunities for a contractor’s drivers. Contractors are more willing to invest in better quality vehicles if they have a longer contract, such as five or more years, during which they can make a better return on their investment. Contractors are also more prepared to invest in staff training if there is certainty that those skills are useful for longer. It is for LEAs to determine where the balance lies, though obtaining a high quality service ought to be a high priority.

Successful tendering and management of LEA contracts should cover:

- objective criteria for the selection of contractors using best value for money practices;
- the types of vehicles to be used, including specifications about required standards;
- specification of the roles and responsibilities of contractors, drivers and any escorts;

<sup>38</sup> Op.cit., Committee Transcript, 10/10/07, para. 106

<sup>39</sup> Op.cit., Committee Transcript 3/10/07, para.113

<sup>40</sup> Op.cit. Committee Transcript, 10/10/07, para.12

<sup>41</sup> Op.cit, Committee Transcript, 3/10/07,para.149

<sup>42</sup> When finalised, the guidance will replace Welsh Office Circular 19/95 (‘Home to School Transport’).

- procedures for the collection, evaluation, keeping and accessibility of information (such as CRB checks, operators’ licences, drivers’ licences, MOT certificates);
- training for drivers and other contractor staff;
- procedures for contractors to bring matters to the attention of LEAs and /or schools;
- stipulation of the frequency and types of monitoring activities that LEAs, or their agents, may undertake (such as programmed visits, spot checks, complaint investigations, and liaison with schools, parents and pupils);
- information exchange with external agencies (such as the Vehicle and Operator Service Agency (VOSA) and the Traffic Commissioner); and
- arrangements to monitor and evaluate the delivery of the service, and to take action if the LEA deems that necessary.<sup>43</sup>

The Welsh Assembly Government Director of Transport Policy and Administration, Simon Shouler, also told us that regional transport planning across Wales under the Transport (Wales) Act 2006 was underway. Regional transport consortia are putting their regional transport plans together and the Assembly Government is looking at those to form a framework to consider bigger bus contracts that could provide far more integrated services.<sup>44</sup>

The Deputy First Minister also told us that in setting contracts, the local authorities would have to have regard to the contents of the Measure, and contracts that conflict with it would be unenforceable.<sup>45</sup>

### 3.11. Transport for Learners with Special Educational Needs

The draft Measure as it stands does not propose making changes to arrangements for learners with Special Educational Needs (SEN). The acting Children’s Commissioner, Maria Battle, had earlier given evidence to the Committee considering the Additional Learning Needs LCO.<sup>46</sup> In her evidence to us she said she thought it “more appropriate that travel is included in this Measure than in the LCO. However, there needs to be similarity in the definitions of the additional or special need between the Measure and the LCO”. She concluded:

In our view, if we are to have just one measure applicable to the travel needs of children with special educational needs, it is more appropriate for that to be in this Measure. I would submit, however, that it should be broader than currently drafted.<sup>47</sup>

In his letter on legal issues to the Chair (**Annex 1**), the Deputy First Minister stated:

I understand that it was confirmed to the ALN-LCO Scrutiny Committee last week that any Measure (using Matter 5.17 as its enabling power) which makes provision about persons with additional learning needs can also make provision (using Matter 5.10 as

<sup>43</sup> Welsh Assembly Government, *Home to School Transport, Consultation Document*, November 2006. Paras. 2.6- 2.8 <http://new.wales.gov.uk/docrepos/40382/4038232/403829/Consultations/2006/hometoschooltransport-con-e?lang=en>

<sup>44</sup> Op.cit. Committee Transcript, 10/10/07, para.240

<sup>45</sup> Ibid., para.275

<sup>46</sup> ALN(3)-03-07(p.1) Children’s Commissioner for Wales: *Response to the National Assembly for Wales consultation on the proposed additional learning needs draft legislative competence order 2007*. <http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-aln-home/bus-committees-third-aln-agendas.htm?act=dis&id=59517&ds=10/2007>

<sup>47</sup> Op.cit., Committee Transcript, 3/10/07, para. 17

an additional enabling power) for travel arrangements for such persons receiving primary, secondary or further education or training. I also understand that the Minister for Children, Education, Lifelong Learning and Skills has submitted advice to that Scrutiny Committee on the issue of legislative competence to make provision for travel arrangements for persons with SEN or ALN.

Clearly, I and my officials will want to consider comments about the proposed Measure and the issues raised regarding those with learning difficulties and we will do so in conjunction with colleagues dealing with the ALN-LCO.

Fforwm also argued that the Measure should give further consideration to disabled learners need to be looked. There is different practice among local authorities about entitlement—some apply it to the age of 19, and others to the age of 25, for providing financial support for transport. Clarification on age criteria for disabled learners would be useful.<sup>48</sup>

### **3.12. Looked after Children**

The Acting Children’s Commissioner also thought that the Measure could be tightened up in respect of “looked after children”:

There is a definition within the Measure of ‘ordinarily resident’, which it would be beneficial to look at again. When a child is looked after, particularly if the child is placed out of the local authority area in which his or her parents live—and a number of children are in out-of-county placements, particularly in rural areas—our experience is that we have to intervene when there are disputes in other fields, such as health, about who will pay for the child. Is it the authority that placed the child or the authority that is housing the child? The definition of ‘ordinarily resident’ is about a child living with a parent and so on, and I counsel that that should be looked at again with looked-after children in mind.<sup>49</sup>

### **3.13. Legal Scope**

Due to the restrictions on the Assembly’s legal scope noted above, a range of concerns about safety, highlighted in earlier reports, have not been addressed in the proposed Measure, for example, seatbelts, 3 for 2 and escorts on all school buses. Witnesses such as BUSK and Stuart’s Campaign expressed their disappointment at the scope of the Measure and most witnesses were of the view that that further powers should be sought from Westminster.

When the Deputy First Minister appeared before the Committee he outlined three options to us:

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<sup>48</sup> Op.Cit., Committee Transcript, 26/09/07, para.188

<sup>49</sup> Op.cit., Committee Transcript, 3/10/07, para.66

The first option is to simply say, 'Well, we think that this Measure goes far enough and there is nothing more that we should do'. The second option is to say, 'We will legislate where we can under this Measure, but we will seek further powers to enable us to deal with some of the other issues that have been raised, which go outside the competence of this Measure'. The third option is to say, 'Well, we could put everything on hold and wait for further powers and then have a comprehensive Measure'.<sup>50</sup>

He told us that he is minded to go with the second option.

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<sup>50</sup> Op.cit., Committee Transcript, 10/10/07. para.220

## Recommendations

### Recommendation 1:

A clear consensus exists across the board that the scope of the draft Measure is too limited (because the Assembly's legislative competence is too limited) and further powers should be sought from Westminster. The Committee welcomes the Deputy First Minister's undertaking to seek those powers.

However, we await to see what proposals the Assembly Government brings forward and an indication of a likely timescale for bringing forward an LCO.

**1. We may therefore consider bringing forward an LCO of our own if we remain unsatisfied in respect of these.**

### Recommendation 2:

We heard compelling evidence that procurement was an issue of vital importance in ensuring safe and good quality school transport which has a knock on effect on behaviour. The Deputy First Minister assured us that Guidance issued under the Measure would be relevant to local authority contracts.

**2. We recommend that the current non statutory Guidance on contracts be placed on a statutory basis and that it should include a standard draft tender document.**

### Recommendation 3:

A number of witnesses felt strongly that the draft Measure fails to take account of the 14-19 Learning Pathways agenda which involved learners moving between sites of learning during the school/college day. The Deputy First Minister said that this was not being considered in the draft Measure.

**3. The Committee recommends that the Deputy First Minister reconsiders his position and explores the ways in which the draft Measure may be re-drafted to take into account the 14 to 19 Agenda.**

### Recommendation 4:

While most witnesses were in favour of the principle of a Code of Conduct the committee heard widely diverging views on how they could be enforced and what their coverage should be.

**4. The Committee recommends that the Deputy First Minister reflects on evidence heard by this Committee and gives further consideration to the enforcement and coverage of the Code of Conduct.**

### Recommendation 5:

We also heard some evidence relating to the issue of whether the Code of Conduct should apply to pupils travelling to school by other modes of transport than dedicated school buses.

The Committee received legal advice that the Measure did cover all forms of transport if arrangements were made by the local authority. Concern was expressed by the CPT about the implications of this advice as seen in **Annex 2**.

**5. The Committee recommends that the Deputy First Minister gives further consideration to the issue of which learner travellers are covered by the Code of Conduct and takes particular note of the concerns raised by the CPT.**

**Recommendation 6:**

Most witnesses support the decision on staggering opening hours resting with local authorities but Governors Wales remain strongly opposed. Everyone agreed that there would need to be very good co-operation between key stakeholders.

**6. The Committee recommends that the Deputy First Minister reflects on evidence heard by this Committee and gives further consideration to the provisions in the draft Measure regarding staggered hours.**

**Recommendation 7:**

The committee received some evidence that the part of the Measure that retains the discretion of the local authorities to make arrangements for Welsh medium and denominational should be changed so that Welsh medium schools were placed on the same basis as English schools. The Assembly Government told us that this would have a knock on effect on school organisation in different parts of Wales and provided the Committee with a further note which may be seen in **Annex 1**.

**7. The Committee notes the Deputy First Minister's explanation of the legal position in regard of defining Welsh medium schools.**

**Recommendation 8:**

We heard from the acting Children's Commissioner that issues relating to SEN learners' travel should be dealt with in this Measure rather than a future Measure emerging from the Additional Learning Needs LCO. She also said that the definitions of what constituted disability needed to be aligned in the draft Measure and the LCO. The Deputy First Minister said that he would consider her comments and has further indicated to the Committee that "I and my officials will want to consider comments about the proposed Measure and the issues raised regarding those with learning difficulties and we will do so in conjunction with colleagues dealing with the ALN-LCO".

**8. We welcome the intention of the Deputy First Minister to take account of ALN issues in the Measure and the to co-operate with colleagues dealing with the Additional Learning Needs LCO and recommend that he amends the Measure if necessary.**



**Recommendation 9:**

The acting Children's Commissioner also suggested amending the wording in the draft Measure in respect of "ordinarily resident" and its implications for looked after children.

**9. We recommend that the Deputy First Minister and his officials consider the implications for looked after children and amend the draft Measure if necessary.**



## **Annex 1: Letter from the Deputy First Minister, Ieuan Wyn Jones AM, to the Committee Chair on Legal Issues Arising and attached Note**

Gareth Jones AM  
Chair - Enterprise and Learning Committee  
National Assembly for Wales  
Cardiff Bay  
Cardiff  
CF99 1NA

5<sup>th</sup> November 2007

Dear Gareth,

Further to the meeting at which I gave oral evidence, I now append a note which sets out the legal issues to be considered in the light of any proposed changes to take account of entitlement to Welsh Medium Schools. The Committee no doubt will wish to reflect on these issues and let me have your further thoughts.

Another issue to be considered is the fact that the pattern of linguistic provision in schools varies throughout Wales. In some areas the distinction between English Medium and Welsh Medium is clear. But in others varying degrees of Welsh Medium is provided. Some schools will be bilingual, some will be mainly Welsh Medium or English Medium or dual stream. These issues raise complex matters if we were to seek to define Welsh Medium education for the purpose of the Measure. I have asked the Legal Team to consider further.

Committee members also raised issues about the Additional Learning Needs LCO and I agreed to reflect on those. The draft Learner Travel (Wales) Measure seeks to clarify the existing legal position on learner travel. There is a specific requirement (section 2(4)) on local authorities, when fulfilling their duty to assess the travel needs of learners in their area, to have regard to the needs of learners who are disabled persons and the needs of learners with learning difficulties. Section 3 places a duty on local authorities to make transport arrangements which are suitable and available, and also requires arrangements to be reasonably stress free and safe, as well as not taking an unreasonable amount of time. Local authorities must have regard to any learning difficulties a child may have when determining whether education or training is suitable. Section 4 places a duty on local authorities to make other travel arrangements if they judge it is necessary to enable a child to receive education or training. The explanatory notes highlight that this could be used, for example, to arrange for an escort or for equipment for a disabled child.

Guidance issued by the Welsh Ministers under the Measure could also provide further clarification on these issues (and others) if necessary.

I understand that it was confirmed to the ALN-LCO Scrutiny Committee last week that any Measure (using Matter 5.17 as its enabling power) which makes provision about persons with additional learning needs can also make provision (using Matter 5.10 as an additional enabling power) for travel arrangements for such persons receiving primary, secondary or further education or training. I also understand that the Minister for Children, Education, Lifelong Learning and Skills has submitted advice to that Scrutiny Committee on the issue of legislative competence to make provision for travel arrangements for persons with SEN or ALN.

Clearly, I and my officials will want to consider comments about the proposed Measure and the issues raised regarding those with learning difficulties and we will do so in conjunction with colleagues dealing with the ALN-LCO.

I look forward to receiving the Committee's report in the coming weeks and reiterate my desire to consider the views expressed so that we can take forward the agenda here in a way that best benefits pupils across Wales.

A handwritten signature in black ink, appearing to read 'Ieuan Wyn Jones', written in a cursive style.

**Ieuan Wyn Jones**

**Gweinidog dros yr Economi a Thrafnidiaeth  
Minister for the Economy and Transport**

## Proposed Learner Travel (Wales) Measure

### Transport to Welsh Medium Schools

#### Note prepared by the Assembly Government's Legal Services Department

1. The note outlines current legal issues in relation to the provision of transport to Welsh medium schools.

#### European Convention on Human Rights

2. Article 2 of the First Protocol to the European Convention on Human Rights ("ECHR") provides that -

*"No person shall be denied the right to education. In the exercise of any functions which it assumes in relation to education and to teaching, the State shall respect the right of parents to ensure such education and training in conformity with their own religious and philosophical convictions"*

3. Article 14 of the ECHR provides that -

*"The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth or other status"*

4. ECHR case law has established the following principles:-
  - a) There is no right of access to a particular school of choice;
  - b) There is no guarantee to a particular system of education;
  - c) There is no right to be taught in a language of the pupil's or parent's choice;
  - d) There is no right to be educated through a particular language medium provided the education is given through one of the languages of the state.

5. Although there is no right to be educated in the language of a parent or pupil's choice, the *Belgian Linguistic case* (*Belgian Linguistic case* (No. 2) judgment of 23 July 1968, 1 EHRR 252) makes it clear that there must be no unjustified discrimination on the grounds of language where the state provides education in more than one state language. Any difference in treatment must be objectively and reasonably justified, pursue a legitimate aim and be proportionate.
6. There is an argument that transport to schools is too far removed from access to education to be within the ambit of Article 2 of Protocol 1, and that therefore Article 14 is not engaged. Although there has been no decision on this issue, it is considered that a court is more likely than not to find that Article 2 of Protocol 1 would be engaged so that any difference in the treatment of pupils in similar circumstances in relation to the provision of free transport to Welsh medium and to English medium schools would amount to unlawful discrimination unless it could be objectively justified.
7. There is therefore a risk of unlawful discrimination if legislation were to prescribe that free school transport is to be provided to schools of a particular language medium but did not make the same provision in relation to schools of another language medium constituting a state language. It is considered unlikely that providing for more favourable transport arrangements throughout Wales for parents wanting a Welsh medium education for their children but not doing the same for parents wanting an English medium education for their children can be objectively justified. Such differential treatment may, depending on the facts, be capable of objective justification in certain circumstances or in certain areas (if, for example, there is a clear administrative or financial justification for encouraging attendance at a particular school).

## **Legal Services**

**29 October 2007**

## Annex 2: Letter from CPT



Cyd-ffederasiwn Cludwyr Teithwyr Cymru  
Confederation of Passenger Transport Wales

Gareth Jones Ysw AC  
Cadeirydd  
Pwyllgor Craffu Menter a Dysgu  
Cynulliad Cenedlaethol Cymru  
CAERDYDD  
CF99 1NA

19 Hydref 2007

Annwyl Gareth

### **LEARNER TRAVEL MEASURE**

Thank you for the opportunity to submit written evidence and to appear before the committee as part of your pre-legislative enquiry into the Learner Travel Measure. We appreciated this very much and hope that we contributed to your work.

We have some concerns over the legal interpretation of one aspect of the measure which emerged during the hearing, and which has not been resolved, we feel, following a discussion with the Assembly Chief Legal Adviser. This centres on paragraph 1.2 of the measure, (provision of transport) and Section 10 (behavioural code).

Our understanding has been that the measure would apply only to school contract (closed door) services, and not to learners travelling on regular services (services which carry ordinary fare paying passengers) which, as we outlined, is roughly half of all learners travelling to school/college by bus.

During the hearing, however, advice was given by the committee legal adviser that the measure will also apply to learners travelling on non-school contract services where their travel is either paid for by the LEA.

According to that advice, the behavioural code will apply equally to learners on non-school contract services where their travel is paid for by the LEA. This has been confirmed in a subsequent discussion with the new Chief Legal Adviser to the Assembly.

If this is, in fact, the case, we believe that it would lead to great confusion and place unacceptable burdens on operators and, even moreso, on drivers. We outlined to the committee that there are three types of bus services on which learners travel:

1. school contract services that are paid for by the LEA and where the LEA has control. The behaviour code would apply here which is common sense;
2. commercial services – where no financial support is received and where learners travelling on them pay the normal applicable fare. Gwyn Griffiths advised that the code of

conduct would apply to any learners travelling on these services whose travel is paid for by the LEA. This is iniquitous as these services carry both learners travelling free (in effect holders of LEA school bus passes) and also others who pay the normal applicable fare and to whom the code of conduct would NOT apply. This second category would include those living under the two or three mile limit but who choose to travel by bus;

3. tendered services, normally receiving support from the local authority as socially necessary services which cannot be operated commercially. The same will apply here as in 2 above.

The scenario could well arise daily across Wales, therefore, where learners travelling on the same bus will be divided into those who are subject to the behavioural code and those who are not. As well as being unsatisfactory, this would also be unworkable and could lead to a chaotic behavioural situation where the actual aim is to try to improve behaviour.

Additionally, it would put extra responsibility on the driver who, as we emphasised during our appearance before the committee, is there to drive the bus. CPTCymru believes very strongly that, if this legal interpretation is correct, the measure needs to be amended and the suggestion made in our written submissions – that the behavioural code be enforceable for all modes of travelling to school, including cyclists and walkers – is a possible means of dealing with this.

We would be happy to be recalled before the committee on this if you feel that would be helpful.

Yn gywir iawn

JOHN POCKETT

Cyfarwyddwr

Director



### Annex 3 – Extract from Committee Transcript 10 October 2007

[227] **Gareth Jones:** Mae hwnnw'n fater o bwys. Derbyniaf yr hyn y cyfeiriodd Kirsty ato, a derbyniaf hefyd, o ateb Catrin, fod cymhlethdodau cyfreithiol. Er hynny, pwynt arall Kirsty yw bod y Mesur hwn efallai'n gyfyngedig i'r gwasanaethau contract yn hytrach na gwasanaethau bws cyffredin. Yr wyf yn hynod falch fod Gwyn Griffiths gyda ni, gan ei fod wedi edrych ar y pwynt hwnnw, a gofynnaf iddo roi ei sylwadau am ein dehongliad ni, a rhoi'i ddehongliad ef, o'r rhan honno yn y Mesur. Bydd gwerth gwranddo ar hyn sydd ganddo i'w ddweud.

[228] **Mr Griffiths:** Yr wyf am gyfeirio aelodau'r pwyllgor at adran 1(2) y Mesur arfaethedig, sy'n esbonio bod trefniadau teithio sy'n dod o fewn cwmpas y Mesur yn cynnwys cludiant yn y modd yr ydym wedi clywed amdano y bore yma, ynghyd â cludiant lle mae'r awdurdod yn talu naill ai'r cyfan neu unrhyw ran o dreuliau teithio rhesymol person, neu'n talu lwfansau mewn cysylltiad â defnyddio dulliau teithio penodol. Felly, os bydd person yn defnyddio gwasanaeth bws cyffredin a bod yr awdurdod lleol yn talu am y tocyn, daw hynny o fewn cwmpas y trefniadau teithio a drafodir yn y Mesur, ac felly fe fyddai'n dod o fewn cwmpas y trefniadau goruchwyllo a disgyblu y clywsom amdanynt y bore yma.

[229] **Gareth Jones:** Teimlaf fod hwnnw'n bwynt pwysig i bawb ohonom ei ddeall, ac yr wyf yn ddiolchgar i Gwyn am ein cyfarwyddo.

[230] **Ms Huws:** Byddwn yn cytuno â hynny.

[231] **Y Dirprwy Brif Weinidog:** Yr wyf yn falch fod y cyfreithwyr yn cytuno.

**Gareth Jones:** That is an important matter. I accept Kirsty's point, and I also accept that there are legal complications, as Catrin pointed out in her response. However, Kirsty's other point is that this Measure is perhaps limited to contracted services rather than regular bus services. I am particularly pleased that Gwyn Griffiths is with us, as he has looked at this point, and I now ask him to give his observations of our interpretation and to share his own interpretation of that part of the Measure. It will be worth hearing what he has to say.

**Mr Griffiths:** I wish to direct committee members to section 1(2) of the proposed Measure, which explains that the travel arrangements that come within the scope of the Measure include transport provision as detailed this morning, along with transport provision where the authority pays for the whole or any part of a person's reasonable travel expenses, or pays allowances in respect of the use of particular modes of transport. So, if a person travels on a general service bus and the local authority pays for the ticket, that comes within the scope of the travel arrangements outlined in the Measure, and that would therefore fall within the scope of the supervision and discipline arrangements we have heard about this morning.

**Gareth Jones:** I feel that that is an important point for us all to understand, and I am grateful to Gwyn for his advice.

**Ms Huws:** I would agree with that.

**The Deputy First Minister:** I am pleased that the lawyers agree on this point.



## **Annex 4 – Links to Record of Proceedings’ Transcripts.**

**Please see below the links to the Committee meeting transcripts in which oral evidence was taken on the draft Learner Travel (Wales) Measure**

**EL(3)-04-07: 26 September 2007**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60129&ds=9/2007>

**EL(3)-05-07: 3 October 2007**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60910&ds=10/2007>

**EL(3)-07-07: 10 October 2007**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=61711&ds=11/2007>



## **Annex 5 – Links to Written Evidence**

**Please see below the links to the written evidence taken on the draft Learner Travel (Wales) Measure**

**26 September 2007**

**EL(3)-04-07 (p1): Welsh Secondary Schools Association**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=58999&ds=9/2007>

**EL(3)-04-07 (p2): Governors Wales Submission**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=58955&ds=9/2007>

**EL(3)-04-07 (p3): Fforwm**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=58973&ds=9/2007>

**EL(3)-04-07 (p4): ASCL Cymru and National Association of Head Teachers**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=58956&ds=9/2007>

**3 October 2007**

**EL(3)-05-07 (p1): Children's Commissioner for Wales**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59673&ds=10/2007>

**EL(3)-05-07 (p2): RhAG**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59957&ds=10/2007>

**EL(3)-05-07 (p2) Annex 1: RhAG**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59862&ds=10/2007>

**EL(3)-05-07 (p3): Stuart's Campaign**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59695&ds=10/2007>

**EL(3)-05-07 (p4): BUSK**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59698&ds=10/2007>

**EL(3)-05-07 (p5): Funky Dragon response to the Welsh Assembly Government consultation on the Learner Travel (Wales) Measure**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59702&ds=10/2007>

**EL(3)-05-07 (p6): Sustrans Cymru response to the Welsh Assembly Government consultation on the Learner Travel (Wales) Measure**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=59701&ds=10/2007>

**10 October 2007**

**EL(3)-06-07 (p1): Association of Transport Co-ordination Officers**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60527&ds=10/2007>

**EL(3)-06-07 (p2): Confederation of Passenger Transport**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60115&ds=10/2007>

**EL(3)-06-07 (p3): Welsh Local Government Association**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60224&ds=10/2007>

**EL(3)-06-07 (p4): Welsh Assembly Government**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60537&ds=10/2007>

**EL(3)-06-07 (p5): National Autistic Society Cymru response to the Welsh Assembly Government consultation on the Learner Travel (Wales) Measure**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=60536&ds=10/2007>

24 October 2007

**EL(3)-08-07: (p4): CYDAG response to the Welsh Assembly Government consultation on the Learner Travel (Wales) Measure**

<http://www.assemblywales.org/bus-home/bus-committees/bus-committees-third-assem/bus-committees-third-els-home/bus-committees-third-els-agendas.htm?act=dis&id=62088&ds=11/2007>