## Diocese of Middlesbrough



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Mrs Lynda Brown Stockton on Tees Borough Council

22<sup>nd</sup> June 2016

Dear Lynda,

Thank you for the meeting up with me to discuss the proposed changes to school transport policy in Stockton on Tees.

As discussed at the meeting whilst the Diocese of Middlesbrough does not have a specific concern regarding the proposed policy changes ,specifically their impact on Diocesan schools, we do have a deep and principled objection to the current arrangements for funding school transport for young people in Ingleby Barwick which it would appear you are seeking to perpetuate in your revised policy.

In simple terms, both the current and proposed school transport policies are not equitable or fair for students who reside in Ingleby Barwick and wish to choose St Patrick's Catholic College Thornaby for their secondary education.

This is because the school transport policy contains in built preferential treatment and bias in relation to the cost and provision of school transport for students living in Ingleby Barwick who choose to attend Conyers School and Eggliscliffe School respectively which is not afforded to St Patricks Catholic College Thornaby.

It is my understanding that young people in Y7 to Y11 living in Ingleby Barwic, where currently the number of students exceeds the number of immediately available local places, can under the 'suitable school' criteria within the school transport policy receive funded transport to Conyers School and Eggliscliffe Schools respectively but not to St Patrick's Catholic College Thornaby.

This is because although St Patrick's Catholic College is nearer, it is does not meet the 'suitable school' criteria which I understand is linked to admissions zones.

To allow parents and students of Catholic faith to access a Catholic school, historically schools like St Patrick's Catholic College have had to draw admissions applications from beyond their local community and so have not included 'zones' in their admissions policy. As a result it appears we are unable to be described as a 'suitable school' within the definition of the current and proposed policy as it relies on admissions zones to determine whether you can be described as a suitable schools.

In reality this means that the Council will fund transport for parents in Ingleby Barwick to access education in the more affluent and socially advantaged area of Yarm and Eaglescliffe but not the more socio economic challenged area of Thornaby on Tees. This is clearly an unintended and unforeseen consequence of the school transport policy and clearly conflicts significantly with the Council's Equality Statement and Single Equality Scheme.

More worryingly for the Diocese and our four schools in Stockton on Tees, the current and proposed policies undermines completely the strategic vision for the Our Lady of Light Catholic Academy Trust in which our four schools operate as to achieve our vision of seamless 3 to 16 Catholic education for our children we seek to encourage parents from St Therese of Liseux Catholic Academy in Ingleby Barwick to choose St Patrick's Catholic College for their secondary education at age 11.

However, for parents of pupils leaving St Therese of Liseux Catholic Academy in Ingleby Barwick at age 11, to be certain their child can receive assistance with transport to school, parents are being forced to choose Conyers School and Egglescliffe School over St Patrick's Catholic College. This is unfair and discriminatory against St Patrick's Catholic College, a schools with a religious character.

In essence, all things being equal in terms of school performance and the quality of the education excellence offered by Conyers, Eggliscliffe and St Patrick's Catholic College respectively, St Patrick's Catholic College will always be at a disadvantage and treated less favourably than Conyers and Egglescliffe as the Council will provide transport for parents who choose Conyers and Egglescliffe but not St Patrick's. This cannot be right?

The Diocese would ask that in introducing a revised school transport policy, Stockton Borough Council correct this anomaly and ensure that St Patrick's Catholic College Thornaby is treated in a no better no worse position than other non-Catholic schools that serve the area of Ingleby Barwick.

It would appear the simplest way to achieve this would be for St Patrick's to be allowed to be described in admissions and transport terms as a 'suitable school'. I am sure the academy would be happy, subject to the retention of our admission priority for baptised Catholics to identify a suitable admissions zone that would include Thornaby and Ingleby Barwick.

I look forward to your response and proposal to revise the current arrangements to ensure equality and fairness to schools of a religious character such as St Patrick's Catholic College in the operation of the school transport policy for Stockton Borough Council.

**Best Wishes** 

**Kevin Duffy** 

**Diocesan Schools Commissioner** 

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Diocese of Middlesbrough

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DEPARTMENT FOR EDUCATION -

School Admissions Team 16 Church Road Stockton on Tees TS18 1XE

30 June 2016

Dear Sir/Madam

## Consultation on the proposal to remove free transport to pupils on the grounds of religion or belief

I am writing on behalf of the Diocese of Hexham and Newcastle to formally object to the proposed changes to the Home to School Transport Policy where it is proposed that free transport to faith schools stops, except where there are legal requirements that must be met.

## Looking first to principle, the Diocese would identify consideration of the following:

- Assistance with travel costs to denominational schools was enshrined within Section 55 of the 1944
   Education Act. It was reinforced in Schedule 19, paragraph 15 of the 1993 Education Act and Section 509 of the 1996 Education Act.
- More recently the 2006 Education and Inspections Bill specifically aimed to reduce the impact of transport as a barrier to parents exercising their education preferences and also improved and extended the offer of free transport originally set out in the 1944 Education Act. As a result the Government is funding Local Authorities to provide secondary age pupils from low-income families with transport to the nearest school preferred on the grounds of religion or belief where this is between 2 and 15 miles from the pupil's home.
- The maintenance of free transport where it currently exists is also reinforced via conventions developed by the United Nations on Human Rights (1948), Civil and Political Rights (1996) and the Rights of the Child (1989). All three have been ratified by the UK Government in 1951, 1976 and 1991 respectively. The European Convention on Human Rights, incorporated into UK Law in 1998, guarantees that the enjoyment of the rights and freedoms to education shall be secured without discrimination on religious grounds.
- Children accessing their nearest zoned Community schools and Foundation schools will continue with
  their present support whilst those looking to the nearest Catholic school may well be penalised. Add to
  this that the parents who will be most heavily hit in Catholic schools are likely to be those just over the
  income thresholds and may well find expression of their preferences a financial impossibility. This
  discriminates against such parents on both religious and socio-economic grounds.
- The ending of transport entitlement will also have lead to the Authority contravening long established practices. The Diocese would suggest that withdrawal from these is not acceptable. This view has been echoed by Secretaries of State for Education who have expressed their hope that Authorities will continue to think it right not to disturb well established practices. They have continued to attach great importance

to the opportunity that many parents have to choose a school in accordance with their religious convictions. Moreover I am certain that all parties concerned would not wish to see changes in school transport which might disrupt the excellent education standards achieved by pupils currently attending Catholic schools in Stockton.

Restrictions on transport provision to Catholic schools runs contrary to the thrust of legal obligations and
long standing practices so the conclusion is that a reasonable Local Authority properly directing itself as to
its legal obligations and the principles of public service should find it necessary to continue the relevant
free transport in order to facilitate the attendance at Catholic schools.

#### **Nationally Agreed Policies**

## The Diocese suggests that the ending of entitlement contradicts:

- The promotion of education diversity to enhance the range of preferences available to parents. For many
  of the latter the lack of transport support to Catholic schools will necessarily diminish that range.
- Currently 20% of morning rush hour traffic is attributable to the school run and Government policy is to
  generate a modal shift from car to bus. For children entering Catholic schools in the future and lacking
  transport support to school the outcome could be an unacceptable increase in car use, presenting risks to
  the environment and subsequently to children's health and well-being.

## **Lack of Clarity**

- In the interests of community cohesion and social inclusion Catholic schools, with places available, welcome applications from parents of other faiths or no faith who want a Catholic education for their children. As these parents are not expressing those preferences as a result of their Roman Catholic faith do they in turn still qualify for free transport?
- Bear in mind too that non Catholic schools within the Authority will not be offering Collective Worship
  and Religious Education in accordance with the teachings, doctrines, disciplines and norms of the Roman
  Catholic Church and so may not be deemed suitable in that context for those seeking a Catholic
  education.

#### **Proposed Financial Savings**

During the course of our meeting with officers of the LA on 27 May 2016 it was accepted that the savings figure provided had not taken into account that a smaller number of eligible pupils may still require a certain number of buses and, obviously, drivers. This puts a question over the savings figure being claimed. A more complex analysis is required to enable an accurate figure to be presented. Until this is completed meaningful consultation upon the proposed change cannot be undertaken.

From any potential saving must be deducted the costs of transport to Catholic schools for children deemed as vulnerable and hard to place:

- Pupils permanently excluded from other schools;
- Looked after children (LAC);
- Children who have been out of education for longer than one school term and where attempts at 'normal' admission have so far failed;
- Children of registered refugees and asylum seekers where previous attempts through 'normal' admissions have failed;

o Children returning from secure units or otherwise having serious offending issues.

Added to these are children with Statements of Special Needs. Taken together the cost of exemptions and their administration will eat into any proposed savings.

However, of much greater concern is the fact that both the Draft Policy and the Consultation Document make no reference whatsoever to the projected savings that the authority shared with us in our meeting of 27 May 2016. As indicated above the figure itself must be treated with great caution. Yet this saving was advanced as THE reason for moving school transport to the statutory minimum. This reason is not provided to the parents and public of Stockton. Why has the information been withheld? This significant omission fatally flaws the whole consultation process and renders it invalid. It would not be appropriate for the council members of Stockton to be asked to make such a far-reaching decision based upon such a flawed consultation exercise.

## **Disadvantaging the Poor**

Whilst children on free school meals will still be entitled to free school transport there are many from families just above the threshold for free school meals who will suffer. As a consequence Catholic schools could well become an establishment for the better-off who can afford to send their children to them. Such a change flies in the face of our mission as Catholic schools.

## **Damage to Community schools**

Some Catholic schools are regularly oversubscribed. If places are freed-up by Catholic children unable to afford the travel costs they will, in many instances, be filled by children who would otherwise have attended another local school. This factor is one which I feel may cause concern to headteachers of local schools.

It is worth emphasising too that provision of schools by the Diocese has saved the Authority many millions of pounds and that parents at Catholic schools are still heavily subsidising the public purse by a 10% contribution to building and repair costs in those schools. These same parents, as tax and rate payers, are also contributing to Stockton's school education budget and if charges were introduced they will continue to do this whilst being denied any transport support to their nearest Catholic school; an outcome which is contrary to natural justice and clearly undermines the concept of 'free' Catholic education.

#### **Nearest Qualifying School**

The policy states that the council will continue to fund transport to the nearest suitable and available school if the child qualifies on distance. However, there would appear to be an arrangement that the council intends to continue with that raises the question of fairness. We understand that free transport will continue to be provided to children who live in Ingleby Barwick to enable them to attend Egglescliffe and Conyers. Yet the nearest secondary schools are All Saints Academy, Ingleby Manor Free School and Thornaby Academy (for some children). If this is the case then it would appear to be not simply anomolous but discriminatory to withdraw free transport for Catholic pupils but leave the above arrangement in place.

## **Feeder Primary Schools**

The Diocese of Hexham and Newcastle operates a "feeder primary school" system right across the diocese. This system has been in place for many decades and has always included our schools in Stockton Authority. In the meeting of 27 May 2016 we were surprised that the LA stated that they were unaware of this. I raise the issue because it would appear that the feeder-primary/secondary link that could be significantly damaged by the transport proposal is St Joseph's Norton and St Michael's Billingham. St Joseph's children have traditionally moved onto St Michael's and there is a real fear that the partnership could be under threat if the proposal goes through.

#### **On-line Consultation Form**

In the course of the Scrutiny Committee meeting of 29 June 2016 it was stated that the On-line Consultation Form had been changed that very day. It is only fair that this change is communicated to parents and to the general public. This change must also mean that the consultation period has to be re-run; the clock must be re-set and the 28 working day window re-commenced. If this were done immediately the consultation period would go into the summer holiday. In the world of education it is accepted as good practice that school-related consultations are not run across school holidays. The consequence of this is that there is now a further reason why the current consultation is flawed and must be brought to a halt. If it is decided to re-run it this can hardly be done before the new academic year in September 2016.

#### Conclusion

Your consultation document states that "every effort will be made, in the interests of the child, to maintain stability in education." Your proposal could seriously de-stabilise Catholic education in the authority, especially with regard to St Michael's and their long-standing relationship with St Joseph's Norton. We strongly disagree with your proposal. In addition, as stated above, the consultation is seriously flawed with significant information being withheld. Therefore we ask that the Authority withdraws any proposal to penalise parents for seeking places at schools for their children on the grounds of religion or belief. As per its remit the Diocese has advanced its arguments on behalf of those schools which fall to the responsibilities of the Bishop of Hexham and Newcastle but equally feels that the case presented applies with the same force to all parents seeking places in denominational schools for their children.

With every good wish.

Yours sincerely

Joe Hughes

Director of the Education Service

CC:

Cllr Ann McCoy, Lead Cabinet Member – Children and Young People Jane Humphreys, Director of Children, Education and Social Care Lynda Brown, Assistant Director of Education Mary Tate, Headteacher, St Joseph's RC Primary, Norton Maura Regan, CEO, Carmel MAT Andrew Ramsey, Headteacher, St Michael's Catholic Academy, Billingham

# St Joseph's RC Primary School

Ragworth Road, Norton, Stockton-on-Tees, TS20 1HR Tel: 01642 360401 Fax: 01642 557369

Email: office@sjnorton.org.uk Website: www.sjnorton.org.uk

Executive Head Teacher: Miss M. Tate Head of School: Miss G. Dowson



4th July 2016

School Admissions Team 16 Church Road Stockton on Tees TS18 1XE

Dear Sir/Madam

## Consultation on the proposal to remove free transport to pupils on the grounds of religion or belief

I am writing on behalf of St Joseph's RC Primary School, Norton, to formally object to the proposed changes to the Home to School Transport Policy where it is proposed that free transport to faith schools is removed from September 2017.

The families of St Joseph's, Norton are the largest single group affected by these proposed cuts as typically, 200 pupils from Norton are currently transported to their secondary school, St Michael's Academy in Billingham.

As an established feeder school for St Michael's, St Joseph's, Norton send approximately 35-40 children on to St Michael's each year. This has been the situation for decades, with many children now the second and third generation of their family to follow this path.

We understand cost saving exercises have to be made, but these proposed cuts are disproportionate and discriminatory to one large faith community in Norton. At a meeting with local authority officers on 27<sup>th</sup> May, these proposals were referred to as the 'Norton, St Joseph's effect', acknowledging the huge and inflammatory impact these cuts will have on one single community.

#### **Nearest Suitable School**

We acknowledge that the LA has a statutory responsibility to transport children to their nearest suitable school when it is further than 3 miles away for secondary age pupils. The LA have made their point clearly that they consider a 'suitable school' to be any school. In the case of St Joseph's, Norton, the LA consider the nearest suitable school to be North Shore Academy. Parents are free to choose any other school, as is their right, and this includes making a preference to a faith school.

We argue strongly on behalf of our parents, that for a well- established, Catholic community, the nearest suitable school should always be a Catholic school, and for the families of St Joseph's, Norton, the nearest suitable Catholic school continues to be St Michael's Academy, Billingham, where strong links have existed for 40+ years. This school is over 3 miles away from the children's homes in Norton.













The LA proposals do not acknowledge the long established relationship between St Joseph's, Norton and St Michael's, Billingham nor the fact that St Joseph's is the primary feeder school for St Michael's, Billingham and has been for almost 40 years. St Michael's Academy is the only secondary school which names St Joseph's, Norton as a feeder or partner school in its admissions policy for September 2017.

At a meeting with LA officers on 27<sup>th</sup> May, they stated that they were unaware of the existence of a feeder system between faith schools, explaining that school admissions are organised into a 'zone' system within Stockton. At a subsequent meeting on June 22<sup>nd</sup> with parents of St Joseph's, Norton, this comment was retracted and the long established feeder system between faith schools was acknowledged.

In its published Admissions Policy for September 2017, North Shore Academy states that when admitting pupils, it will give priority to those pupils within its own admission zone:

The Primary Schools and Academies in the North Shore Academy admission zone including the villages of Stillington, Old Stillington and Thorpe Thewles are:

Crooksbarn Primary School

Frederick Nattress Primary Academy

Harrow Gate Primary School

Mill Lane Primary School

Norton Primary Academy

Rosebrook Primary School

The Glebe Primary School

St John the Baptist Primary School

Tilery Primary School

The Oak Tree Primary Academy

William Cassidi CE Aided Primary School

Since St Joseph's, Norton is not named as being within the admission zone for North Shore Academy in 2017, it is somewhat confusing for parents in understanding where we fit in to these existing admissions arrangements.

#### Safe Walking Route

The LA has a statutory responsibility to transport pupils to school when there is not a safe walking route to follow. For a large faith community like St Joseph's, Norton, walking to our nearest suitable Catholic school of St Michael's is a journey of 3-4 miles. There is not a safe walking route available for children, other than to cross the A19 Norton/Billingham roundabout. As yet, there has been no discussion as to what plans and costs would be made to improving the infrastructure in order to ensure a safe journey for children on foot.

#### **Charging and Costs of Travel**

The predicted saving to the Home/School Transport Policy will be £20,000 in the first year, through to £80-100,000 in years 4-5. This will be through a gradual phasing out of free transport for faith schools from September 2017.

We feel these savings are minimal. The cuts are being disproportionately applied and target one single faith community in Norton.

Low income families who eligible for free school meals, will continue to be transported free of charge to a faith school of their choice, however, many families lie above this free school meal threshold but their financial position does not permit them to attend St Michael's Academy, given the distance and the transport costs involved. Their right to continue in Catholic education is therefore being taken away from them. At a meeting held in St Joseph's School on 22<sup>nd</sup> June, one parent asked the LA officers if there was any provision in North Shore Academy for her child to be supported in developing their Catholic faith. Officers were unable to reassure her.

#### **The Norton Community**

The proposed cuts, if approved, will create a three tier system for the Catholic community of Norton:

- low income families eligible for free school meals, who will continue to be transported to St Michael's free of charge
- affluent parents who can afford to pay the transport costs to continue attending St Michael's Academy
- families above the free school meal threshold, the so called 'working poor,' who will not be able to
  pay for school transport and therefore will be unable take up their places at St Michael's Academy.

This will then marginalise groups of parents and we feel this strongly represents a dismantling of the faith in Norton based on the financial status of a family.

#### **Consultation with Parents**

The process of consultation over these proposals has been incredibly flawed. Parents at St Joseph's, Norton were alerted to the proposed cuts through a joint letter sent out from St Joseph's and St Michael's, Academy after the May half term break. Over 100+ parents attended a series of three meetings with LA officers on June 21st,  $22^{nd}$  and  $23^{rd}$ , to hear the rationale behind the proposals, which was very welcome. The removal of free transport for faith schools was described to parents as a necessary cost cutting exercise. Officers explained that by law, it is the one element of the current home school transport policy that the LA do not have to deliver, and therefore, it will be phased out from September 2017.

Parents were then instructed on how to respond and give their feedback through the council's online survey. It soon became apparent that the questions on the survey invited parents to comment on a proposal that had in fact already been approved. This wording to the question was changed late on 29<sup>th</sup> June, after many parents had already completed the survey and were unaware that questions had changed.

This action deems the consultation process invalid and it should be stopped. At the very least, a new period of consultation should be arranged. Parents and members of the public must be made aware of this.

## **Children and Young People's Scrutiny Committee**

On 29<sup>th</sup> June, I attended a meeting of the CYP Scrutiny Committee together with Brian Janes from Ian Ramsey School, Andrew Ramsey from St Michael's Academy and Joe Hughes, Diocesan Director for Hexham and Newcastle. We welcomed this opportunity to voice our objections, and explain our concerns, to elected members about the effect of the proposed cuts to the home school transport policy for faith schools. The LA officers present were Lynda Brown and Jane Wright.

The meeting started at 5pm and at 5.14pm, following my presentation, which was second, both officers left the meeting. This meant they did not hear the presentations from Andrew Ramsey and Joe Hughes, nor were available to answer questions from the elected members, a number of whom expressed their concerns on hearing our presentations.

#### **Discretionary Powers for Local Authorities**

The Secretary of State is clear in his 2014 guidance, on the discretionary powers of local authorities when making changes to home/school transport policies:

The Secretary of State expects local authorities to consider all possible options before they disturb well established arrangements, some of which have been associated with local agreements or understandings about the siting of schools.

Some parents choose to send their children to a school with a particular ethos because they adhere to a particular faith, or belief. Local authorities need to respect parents' religious and philosophical convictions as to the education to be provided for their children <sup>1</sup>

The Secretary of State continues to attach importance to the opportunity that many parents have to choose a school or college in accordance with their religious or philosophical beliefs, and believes that wherever possible, local authorities should ensure that transport arrangements support the religious or philosophical preference parents express. In many cases these schools may be more distant and therefore the provision of transport and/or training, and the avoidance of unreasonable expenditure on travel are encouraged.

We feel strongly that no account has been taken of these available options when entering into consultation or dialogue with faith communities. No other options have been considered by the local authority in the case of cutting free transport to faith schools, including the effect on families at St Joseph's, Norton who can no longer afford to attend Catholic schools.

Again, we feel this does not represent true consultation and consider the process to be flawed and invalid.

## Fair and Consistent Application of Home/School Transport Policy

In objecting to these proposals, I would like to draw your attention to an inconsistent approach in the LA's Home School Transport arrangements.

The proposals for consultation are to cut free transport for pupils to attend their nearest suitable faith school when it is over 3 miles away on the basis that it does not represent a child's 'nearest suitable school'. In Ingleby Barwick, pupils will continue to be transported free of charge to Egglescliffe and Conyers School when these schools are <u>not</u> their nearest suitable schools. All Saints Academy, Ingleby Manor Free School and Thornaby Academy are in fact the nearest suitable schools for many children in Ingleby Barwick. The creation of Admission Zones to organise and place children in their suitable schools means that in Ingleby Barwick, the nearest suitable schools are not in fact the admission zone schools for pupils.

This represents inequality in the rationale being used to justify cutting transport to faith schools of which St Joseph's, Norton is the largest community affected.

The consultation document states that every effort will be made, in the interests of the child, to maintain stability in education. The proposals being considered will uncouple the long standing relationship between St Joseph's, Norton and St Michael's Academy, Billingham and will prevent parents from seeking places in faith schools on the basis of religion or belief.

Therefore, on behalf of the Catholic community of St Joseph's, Norton, I strongly object to these proposals and the deeply flawed consultation process.

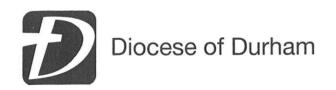
With every good wish.

Mary Tate

Manyfate

**Executive Headteacher** 

CC: Cllr Ann McCoy, Lead Cabinet Member – Children and Young People
Jane Humphreys, Director of Children, Education and Social Care
Linda Brown, Assistant Director of Education
Maura Regan, CEO, Carmel MAT
Andrew Ramsey, Headteacher, St Michael's Catholic Academy, Billingham
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Our Ref: PR/ST

5<sup>th</sup> July 2016

Lynda Brown
Transformation Team
Children's Services
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Church Road
Stockton on Tees
TS18 1LD

Dear Lynda

I set out below my comments as Diocesan Director of Education in response to the consultation on the proposed changes to the Home to School Transport policy which we are wholly in opposition to as it puts financial pressure on all parents who want to make a decision based on their faith and that it will affect the distinctiveness of our schools:-

- As a Diocese we are concerned that this policy will lead to a lack of clear choice for parents who wish for their children to attend a school with a distinctive Christian Character - in our case C of E. This will in turn have an impact on all Church aided secondary schools and will also be likely to affect the choice of parents when considering church primary schools.
- 2. We are also concerned about the dynamic this change in policy may create within a family. A child attending a school before 1 September 2017 could continue to receive free transport whereas younger siblings due to start after this date would not. This could result in parents being unable to pay for siblings' transport, potentially leading to children within the same family attending different schools down to cost. This we believe is fundamentally wrong and can lead to inequality within a family. We would therefore hope that the policy can at the very least be amended to include continuity of free transport for siblings of children already attending a church school and receiving free transport.
- 3. The policy currently states that entitlement to extended rights will be subject to annual assessment. We are concerned about what will happen to children whose parents' financial circumstances change slightly to take them above the Free School Meals threshold. These parents would then need to find the cost of a bus or take children out of a school where they are settled. We would hope that the draft policy can be amended to ensure that once a child is receiving free transport under the extended rights provisions they will continue to receive free

transport even where their parents' circumstances may take them slightly above the FSM line.

4. We recognise that the Council has to make difficult decisions for financial reasons but we are opposed to the amendments to the policy for the reasons outlined above, particularly without any evidence of the actual cost savings likely to be achieved by the revisions to the policy. We would ask that the Council reconsider the proposed amendments in light of the significant likely social and financial impact on families and children.

We also wish to point out that a number of representations have been made to our schools by parents regarding the suggested policy change and we have asked them to respond directly to the local authority.

Please can you confirm safe receipt of this response to the consultation.

Yours sincerely

Paul Rickeard

Director of Education

P. V. Motof

**CE Diocese of Durham**