

The removal of Usual Mode of Travel from the School Census

Briefing Note for Local Authorities in England

This paper contains background information and points of contact to enable all stakeholders who currently benefit from the collection of mode of travel data through school census to successfully engage with officials within DfE, and the relevant Minister For Schools (Nick Gibb, MP for Bognor Regis in West Sussex) to appeal this decision.

Modeshift is urging all our members and other stakeholders to pursue the repeal of the DfE's decision to remove Mode of Travel from the school census as a matter of urgency.

Modeshift Contact:

Emma Sheridan
National Chair
Modeshift
Email: Chair@modeshift.org.uk
Tel: 07714 753 671
www.modeshift.org.uk

Paper prepared by: Emma Sheridan
Contributions from Andrew Combes and Angus Mc Donald

What is the Mode of Travel (MOT) school dataset?

It is an annual record of how children usually travel to school recorded by the majority of Local Education Authority (LEA) schools in England. The collection of this data has been possible through the Schools Information Management System (SIMS) software for a number of years but was made mandatory for schools with an approved School Travel Plan in January 2007. The data is reported by schools once a year as part of their January School Census return.

When was the decision made to remove MOT from the School Census?

Sometime between the publications of *Information about Children, Education and Schools* (ICES) bulletins 49 and 50 - between 23rd May and 15th July 2011. The official announcement is contained within Section 5 of *E-Bulletin no. 50*, dated 29th July 2011 and was notified to software suppliers on 15th July 2011.¹ It was not listed as a change to the Census as part of version 1.1 of the technical specification that was published in June 2011.

How was the decision made?

1. Announcement of Root and Branch Review

On 23rd May 2011 the DfE announced that they were “conducting a root-and-branch review of all data collection requirements on schools (including the School Census)... .. to identify measures to streamline the data returns completed by schools for central government, freeing up time for schools to focus on their core purpose of teaching and learning.” The review is intended to help the DfE achieve a 30 percent reduction in front line data collection burdens by 2011/12.

2. The Bureaucracy Reference Group

The DfE have a newly formed “Bureaucracy Reference Group” (set up by the new coalition Government). This group has 19 school representatives and is intended to advise on reducing unnecessary bureaucracy in schools. This group was consulted on the decision to remove MOT but it is believed that MOT was not specifically considered or debated, rather that it was presented amongst a number of other questions about which the views of the group were invited. It is not clear as to whether the group were presented with the original business case for the inclusion of MOT in the Census nor whether the group was provided with any positive information as to the extensive use that is made of the data at school as well as local and national government level.

3. Other “Consultation”

DfE officers have confirmed that a “limited” consultation was also carried out with the following groups:

- Table discussions at the summer 2010 ICES meetings

¹<http://www.education.gov.uk/schools/adminandfinance/schooladmin/ims/a0063993/information-about-children-education-and-schools-ices-bulletin-formerly-the-dsp-bulletin>

- LA volunteers from the DfE ICES forum
- Primary and Secondary Head Teachers Reference Groups
- Star Chamber Scrutiny Group
- Key Stakeholder Group - 50 members from a range of LAs, ADCS, children's charities and other bodies

From this consultation, DfE have confirmed that only 16 responses identified MOT as a “burden” and that throughout the “consultation” no end users of the data were consulted.

4. Ministerial Decision

DfE officers have confirmed that despite representations from officers within DfT and DH and from schools who participated in the “limited” consultation, that the decision to remove MOT from the Census was made at ministerial level.

Problems with how the decision was made?

1. The review was not, by definition, “root and branch.”

By referring to this review as “root and branch” DfE implied that it would be by definition be large scale and without discrimination. The review has however been discriminatory in that end users of MOT data have not been included in the discussions surrounding its removal – DfE have commented that the restricted consultation deliberate “consultation was on a restricted basis,... on the instruction of Ministers”².

DfE have confirmed that there were only 16 specific responses about the burdens of 'mode of travel'. This is in contrast to the much larger number of 800+ schools who responded to the June 2011 Modeshift survey stating that they wanted to use the MOT data they collected to enhance learning and compare their progress with other schools both locally and nationally. Despite this announcement being made quietly during the school holidays, Modeshift has received a growing number of responses from schools stating that the collection of MOT data is not a burden and something that they value and believe should be retained.

When announcing its review, the Government stated that it was *“committed to engaging with front-line professionals to ensure our proposals have a real and meaningful impact on reducing bureaucracy for schools.”* By limiting its consultation on this issue and deliberately excluding the end users of this data, including a large number of schools up and down the country, the DfE have failed their commitment.

2. A business case for removal has not been considered by Star Chamber

Formed in 1999 and relaunched in October 2006, the role of the Star Chamber is to review existing and proposed data collection and ensure that data collection exercises do not create unnecessary burdens, do not duplicate existing collections, keep data requests to the absolute minimum and streamline exercises wherever possible. In November 2008, the Star Chamber Scrutiny Board was established and given the power to make the decisions on whether the collection proposals should receive approval.

² Email correspondence from Simon Grigor, DfE , 10th August 2011

The removal of MOT from the School Census will be in contradiction to all of the aims of the Star Chamber, which in 2007 approved the Business Case to include MOT in the first place, in that if implemented this decision will:

- Place a larger burden on Local Authorities and schools as they will have to try to fill the gap the loss of this data creates
- Lead to the creation of duplicated but incompatible local data collection systems
- Lead to a greater burden on schools as authorities try to source data locally
- Take us from 'single collection multiple use' to 'multiple collection single use'

DfE have confirmed that "Although there was a business case when this item was introduced, there wasn't a specific business case for removing the field"³

Why is the collection of this data important for Local Authorities?

The information provided by schools from responses to this simple question, provides the richest transport related spatial dataset available to Local Authorities (LAs) in England. It provides actual (rather than modelled) origin and destination data together with usual mode of travel for millions of short-distance local journeys which are made on a daily basis.

The targeting of short-distance local trips has been identified by the Department for Transport as "*the biggest opportunity for people to make sustainable travel choices which will "not just help create economic growth and cut carbon but [will] also contribute to improvements in road safety and in public health"*"⁴

With increasing pressures on LA resources, both human and financial, MOT data from the School Census provides the best value foundation for an evidence-based, targeted, approach to achieving greater levels of active and sustainable travel to school. In addition it is being used as a crucial tool in informing the planning of local services including new school places, housing and local transport initiatives and infrastructure.

Why is the collection of this data important for Schools?

Unlike the majority of other data collected by the School Census, MOT is actively used as a teaching resource by schools. It provides a useful learning tool that schools have told us they want.

A June 2011 national survey of over 1250 schools, undertaken by Modeshift, asked school whether they to use this data in the classroom to enhance learning experiences. Over 90 percent of responses were positive with only 65 schools not wishing to make use of the data. When asked if they were interested in the impact that travel to their school had on both carbon reduction and the health of their communities over 90 percent of respondents said that they did. The removal of MOT from the School Census will hinder the ability of LAs to support schools in monitoring these impacts and comparing their results with other schools a local level and further afield (something which over 70 per cent of schools said they were keen to do.)

³ Email correspondence from Simon Grigor, DfE, 10th August 2011

⁴ *Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen*; DfT, January 2011; page 5

Can the data be collected another way?

DfE have indicated that LAs can continue to collect this data if they wish however:

- Wording of the ICES bulletin implied that MOT “should not be collected” so schools may fear that collecting it would be in breach of DfE guidance.
- LAs stopped local data collection systems in 2007 on the instruction of the DfE who advised against it and insisted that MOT in School Census be used. Reinstatement of local collections will be costly and time consuming both in terms of human and financial resourcing at a time when local budgets are increasingly limited.
- Academy schools report their data directly to DfE and not via their LAs. Access to their data could therefore be lost.

Equally use of the data over the last 3 years, particularly in the South West of the country has proven that once the data is given back to schools in an accessible, classroom friendly, format annual update and accuracy rates see a dramatic increase. The Mode Shift survey also clearly shows that schools want to use this information for the purpose of “teaching and learning” and so its collection and reporting supports this core function rather than detracting resource away from it.

Why the collection should remain at the national level?

1. Removal of MOT from School Census will increase rather than decrease bureaucracy, information requests and costs at all levels.

When the MOT was introduced to the School Census in 2007, LAs were strongly advised by DfE, (then DCSF), to end other local collection methodologies for travel to school data. The majority of LAs followed the instruction of the DfE that “local authorities should ensure that their requests for information from schools are co-ordinated and do not place any unnecessary burdens on schools. The preferred source of data is through the School Census.”⁵ As a result local data collection structures no longer exist in many parts of the country. To reinstate alternative local data collection methods and systems would not only increase the burden of information provision on schools but also create additional financial and human resource burdens on LAs.

The Department of Communities and Local Government states in its business plan that it will “[remove]burdens so that local authorities can prioritise and allocate budgets to support public services in ways which meet the needs of local people and communities.”⁶ The decision by DfE to remove MOT from the School Census is in contradiction to that stated aim. The removal of this key dataset will see an increase in costs to society as LAs attempt to gather this information by alternative means or attempt to make plans without the invaluable evidence that it provides.

The Government, through the Department for Transport, has committed to “improve our data sources by opening up more relevant data to authorities” – with this decision the Government rather than opening up more data, is effectively destroying it.⁷

⁵ *Home to School Travel and Transport Guidance*; DfES 2007 page 8

⁶ *Business Plan 2011-2015*; DCLG November 2010; page 1

⁷ *Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen*; DfT, January 2011; page 32

In short, central collection of MOT through the School Census offers value for money. Its removal will increase rather than decrease bureaucracy at school, LA and national government level.

2. Academy schools report data directly to the DfE

Academy Schools fall outside of local LA data collection but do provide data directly to DfE. As we are now in a position where in some LAs increasing number of schools are opting for Academy status, all secondary schools in some areas, local collection of this data through SIMS will leave large gaps in the dataset unless this information has been already been included in local data-share agreements.

3. National collection of MOT data is supported by other Government Departments

The continued collection of MOT travel through the Census has the support of both the Department of Transport and the Department of Health. DfE have confirmed that “We were aware during the discussions about the item that colleagues in Department for Transport, and Department of Health, would have preferred it to remain in the Census.”⁸

4. School Travel often crosses LA boundaries

The ability for LAs to work together effectively on issues relating to school travel hinges on a standard data set which can be compared across LA boundaries. This is currently provided through the School Census but will be lost as individual LAs are forced to attempt local data collection.

In retaining the collection of MOT as part of the 2011 School Census, the DfE have previously stated that “the condition to provide the [MOT] data is based on having an approved Travel Plan rather than on receipt of any grant.”

What can be done?

On a local level:

1. Continue to encourage collection of MOT through SIMS from LEA schools where possible

At present the SIMS software in schools and LAs will still have the capacity for schools to collect and record MOT data. LA officers are therefore advised to work closely with their Management Information Systems (MIS) officers within Children’s Services to ensure that they and your schools are made aware of the vital local need for this data and encourage them to continue to collect and provide it as usual.

2. Request for MOT of travel to be included in any data share agreements with Academy Schools in your LA

Many LAs will have or will be currently engaged in setting up data share agreements with Academy schools. Where possible MOT data should be included within these agreements to avoid data gaps in future years.

⁸ Email correspondence from Simon Grigor of DfE; 3rd August 2011

Does an appeal process exist?

Yes it does, there are several avenues through which LAs and other stakeholders can express their concerns about this decision. **Decisions concerning removal of questions and data collection through the Census have been reversed so appeal is worthwhile.**

Modeshift is urging all Local Authorities to contact Nick Gibb, the Minister responsible for School Census, directly to express their concerns about this decision and to request that it be reversed as a matter of urgency.

Suggested courses of action

There are 2 paths of appeal and we recommend you pursue both paths:

1. Internally through the intra-government official channels,
2. Externally through politicians, both the ministers responsible and local MPs.

Option 1: Intra-governmental (Internal) Route To Appeal

i) Contact the Star Chamber Secretariat to officially appeal

An appeal process exists whereby policy teams who have good reason to believe that the Star Chamber Scrutiny Board has not acted reasonably in carrying out its functions. The Star Chamber secretariat is the first point of contact and only line of communication to either the Star Chamber or the Star Chamber Scrutiny Board. Their contact details are:

Roger Edwards

Data Services Group

Telephone: 01325 735499

Email: roger.edwards@education.gsi.gov.uk

Simon Grigor

Data Services Group

Department for Education

Sanctuary Buildings

London, SW1P 3BT

Email: simon.grigor@education.gsi.gov.uk

There is also a direct email address to the Star Chamber -

starchamber.mailbox@education.gsi.gov.uk

AND

iii) Officially appeal to the Schools Minister against the decision

Nick Gibb, MP for Bognor Regis in West Sussex is the Schools Minister responsible for the work of the Star Chamber and the Scrutiny Board and the final arbiter in any decisions.

Nick Gibb

Conservative MP for Bognor Regis and Littlehampton

Minister for Schools

Tel: 01243 587016

Address: House of Commons, London, SW1A 0AA.

Email: gibbn@parliament.uk or ministers@education.gsi.gov.uk

What are the Grounds for Official Appeal

Each LA team currently or wishing in the future to use MOT Data collected through the School Census, will have their own specific grounds for appeal, which you should state clearly in any official appeal correspondence to the SCSB. For example:

- **The lack of consultation** with the stakeholders who are end users of the Mode of Travel data, especially as “the Root and Branch Review of Data Collection is ongoing”
- **The swiftness of the process** – from suggestion out of nowhere, to the official (presumably documented) business case to the Star Chamber (or STCB), to the final decision, to the uncharacteristic re-issuing of official technical guidance to suppliers, **in less than 4 weeks**
- Inherent contradiction between the stated aims of this “Reducing Bureaucracy In Schools” initiative - the “freeing up time for schools to focus on their core purpose of teaching and learning” - and the fact that the school census mode of travel data is actively being used as a teaching resource by schools themselves. There is documented evidence showing that analysis of this data has not only been well received by schools but is also being actively used as a teaching resource by them and that in a June 2011 survey of over 1000 schools, over 80% wanted to use the data.
- Inherent contradiction between the acknowledgement of the Star Chamber / SCSB that there are untapped benefits to wider data sharing by DfE with other government departments and the known negative impact that the removal of the mode of travel from school census would have on other central government initiatives (e.g. LSTF funded projects), and local authority initiatives (e.g. school travel plans, safer routes to schools).

Option 2: Political Route To Appeal

As concerned citizens, anyone can appeal to the minister involved directly (Nick Gibbs above) or through their MP. It will also be useful to contact the other Ministers whose areas of responsibility will be impacted by the loss of this data and appeal to them for intervention on this issue:

Department for Education

Interestingly none of the DfE ministers are listed on the DfE website as having a responsibility for Home to School Transport

Michael Gove

Conservative MP for Surrey Heath

Secretary of State for Education

Address: House of Commons, London. SW1A 0AA

Tel: 020 7219 3000

Email: michael.gove.mp@parliament.uk

Email: ministers@education.gsi.gov.uk

Sarah Teather

Liberal Democrat MP for Brent East

Minister of State for Children and Families with responsibility for Health issues (including obesity) as well as Local Authority funding and policy;

Tel: 0208459 0455 (Constituency Office) or 0370 000 2288 (DfE)

Address: DFE, Castle View House, East Lane, Runcorn, Cheshire, WA7 2GL

Email: teathers@parliament.uk

Lord Hill of Oareford

Conservative Parliamentary Under Secretary of State for Schools with responsibility for Sustainability, Freedom of Information and Value for Money

Address: House of Lords, London, SW1A 0PW

Tel: 020 7219 5353

Department for Transport

Philip Hammond

Conservative MP for Runnymede and Weybridge

Secretary of State for Transport

Tel: 01784 453544 (Constituency Office)

Constituency Office: 55 Orchard, Staines, TW18 2DQ

DfT: Department for Transport, Great Minster House, 76 Marsham Street, London, SW1P 4DR

Email: hammondp@parliament.uk or Philip.Hammond@dft.gsi.gov.uk

Norman Baker

Liberal Democrat MP for Lewes

Parliamentary Under Secretary of State for Transport with responsibility for regional and local transport and sustainable travel

Constituency Office: 23 East Street, Lewes, East Sussex, BN7 2LJ

DfT: Department for Transport, Great Minster House, 76 Marsham Street, London, SW1P 4DR

Tel: 01273 480281 (Constituency Office)

Email: norman.baker@dft.gsi.gov.uk

Department for Health

Anne Milton

Conservative MP for Guildford

Parliamentary Under Secretary of State for Public Health with responsibility for Children's health

Constituency Office: 17A Home Farm, Loseley Park, Guildford, GU3 1HS

DH: <http://www.info.doh.gov.uk/contactus.nsf/memo?openform>

Tel: 020 7210 4850

Email: anne.milton.mp@parliament.uk or

<http://www.info.doh.gov.uk/contactus.nsf/memo?openform>

Department for Communities and Local Government

Baroness Hanham

Parliamentary Under Secretary at DCLG with responsibility for Value for money, transparency and data, Climate Change and sustainability

Address: House of Lords, London, SW1A 0PW

Tel: 020 7219 5609

Email: hanhamj@parliament.uk

Grant Shapps

Conservative MP for Welwyn Hatfield

Minister for Housing and Local Government with responsibility for Local Government and Climate Change and sustainable development

Tel: 020 7219 8497

Constituency Office: Welwyn Hatfield Conservatives , Maynard House , The Common , Hatfield , AL10 0NF

Email: grant@shapps.com or contactus@communities.goc.uk

Appendix A

Some additional reasons given to date by the DfE to attempt to justify the removal of MOT from the Census with suggested responses.

(The quotations provided below are taken from emails received from Simon Grigor at DfE dated 10th August 2011)

DfE reason: “Mode of Travel was introduced in School Census primarily to back the SchoolTravel Planning initiative which offered resources for schools completing a travel plan, and this enabled an evaluation of the effect that such plans were having on travel, and through matching, on pupil performance. Since the change of government last year, that initiative has been ended so with it has gone the principle reason for the data being collected by DfE.”

Modeshift response: Whilst the Travelling to School initiative may have ended, the principle reasons for collecting the data have not. The new Government remains committed to sustainable travel, with travel to school cited in a number of recent policy documents and both national and local public health agendas continues to have a focus on reducing childhood obesity and encouraging the population to become more physically active. Mode of Travel to school data, collected through the School Census, provides the only way for LAs to accurately monitor work in these fields and is used by professionals across a wide range of disciplines.

DfE reason: “The item has now been removed following our data review that has consulted primarily with those in schools and local authorities who provide the Department with data. We make no apology for prioritising the views of these groups: it is they who experience the burden of supplying the information, and our data review has an aim of streamlining the work involved in returning data to the centre and freeing up the front-line to carry out their core business, at a time when resources are under very heavy pressure. While a couple of people noted local uses for the data, a considerable majority of those responding on this item noted the burden in collecting it”.

Modeshift response: Modeshift do not expect the Government to apologise for prioritising the needs of those collecting the data but believe that it is wrong to offer no consideration at all to the needs of those who actually use it. In consulting the suppliers of the data, namely the schools, we believe that the sample used was not sufficient and we have contrary evidence collected from over 1250 schools across the country that the data is of use and that there is a desire at school level to continue its collection. This is a significantly larger and more representative sample of the nations schools that demonstrated by the DfE “consultation” and as such should be prioritised in line with the Department’s stated desire to prioritise the views of this group.

DfE Reason: “Although software suppliers have been asked to remove the item from their January School Census extract routines, they have not been told to take the item out of schools’ MI systems. There’s no reason why an LA that agrees with its schools that

continuing to collect such data locally would be valuable should not still be able to get the data.”

Academies report directly to the DfE and not via Local Authorities. In addition the growing number of schools adopting Academy status, will make local collection of this data extremely difficult and create addition bureaucracy for both Local Authorities and schools.

The wording of the ICES bulletin which states that this data “should not be collected” make it appear that schools will be acting against government advice something which they are unlikely to want to do and making it extremely difficult for Local Authorities to request this data separately from the Census.

Whilst the DfE has not specifically asked for Mode of Travel to be removed from the SIMs software, there is the possibility (outside of LA control) that it may be removed as part of future upgrades.