

Nick Gibb MP,
Minister for Schools,
House of Commons,
London.
SW1A 0AA



13th September 2011

Dear Minister

Sudden and unilateral DfE decision to remove “Pupil Mode of Travel” from the National School Census and it’s implications for the UK Data Services industry

I am writing as Managing Director of both Knowledge Mappers Ltd. and Travel Health Check Ltd. to protest at the sudden and unilateral decision by DfE to remove the collection of “Pupil Mode of Travel” from the National School Census, announced in the ICES technical, e-bulletin of 29th July 2011. Correspondence received from the DfE Star Chamber Secretariat implies that the decision was entirely yours after “limited” internal consultation, and so I too must bypass the departments published data management procedures and write to you directly.

I am protesting at what is effectively a u-turn in government data collection policy, apparently made “on the hoof”, without much deliberation or thought for the consequences, and rushed through “on the quiet”. Had you entered into any reasonable sort of external consultation before hand I would have had an opportunity to alert you to the serious ramifications that your decision, and the way it has been made and implemented, has for the whole UK Data Services industry as well as the various “public good” national data initiatives your department and the rest of the government claim to be championing.

I am aware that several of our local authority clients as well as Modeshift, the UK Association for local authority professionals involved in the promotion of sustainable and active travel, have already written to you to also lodge their protest. All are telling you about the disastrous impact that the decision will have at both local and national level, and point out the flawed logic of this as a supposed “reduction in bureaucracy” measure. I fully support everything they have told you and so won’t waste time repeating their words from the local authority point of view. Instead I am presenting reaction to the decision from the Data Services industry perspective. As the managing director of a company that has been providing a widely used, widely praised, commercial service based on the spatial analysis of school census mode of travel data for the last 5 years, I am “bloody livid” at this decision. It certainly hasn’t reduced my bureaucracy in having to get to the bottom of this mess with my customers and write letters to you and your ministerial colleagues.

The merits of the actual decision aside (as I said I will leave it to the local authority community to tell you why it is “wrong”), it is the manner in which it has been arrived at that gives me serious misgivings about your governments regard for the Data Services industry, the wider Knowledge Economy, and SMEs like ourselves in particular. Furthermore as DfE announcements say that this “reducing data

bureaucracy” exercise is “ongoing”, who knows at what random point the axe is going to fall next!

Specifically I am concerned with the following aspects of the way this decision has been made:-

- **Lack of transparency or open-ness** – There seems little point in having well advertised, apparently stringently applied, school census data collection policies & procedures, developed by data management professionals over several years, if they are going to be ignored just because the new minister thinks “wouldn’t it be a good idea if “. The Star Chamber Secretariat have been unable to provide the written business case that, according to the official DfE data collection policy guidelines, must always be submitted before a decision on any change to the school census can be made. This lack of open-ness flies in the face of the Prime Ministers assertions that his is one of the most “open, accountable and transparent governments there is” when it comes to data - well according to his recent speech on the Data.gov website (<http://data.gov.uk/about>) anyway!
- **Lack of consultation with data stakeholders, especially end users** – We have developed the STHC service over the last 5 years in partnership with local authority end users and with the full knowledge of the DfE Travel To School Initiative Board. In 2010 we processed over 1.6 million pupil mode of travel records from over 4,800 UK schools - some 22% of the LEA controlled schools in England. I think we can therefore safely claim to be a major stakeholder and end user of school census data. However the first we, or any of our 29 local authority clients, knew about any change to mode of travel data collection was a “fait accompli” announcement that it was going to be dropped from the national school census , and the SIMS software supplier specifications had already been changed.
- **Lack of consultation with, and regard for, the Data Services industry -** SME’s such as ourselves are the backbone of the UK “knowledge economy”, one of the things that is apparently going to pull this country out of recession. Using our specialist skills and resources that are usually not available “in-house” to many organisations, we build targeted information products and services on the back of the bewildering deluge of available data. However no matter how innovative and well received those products are, there is little long term future for SMEs like us investing all our time and financial resources developing them in collaboration with one part of government, if another part of government is going to pull the rug out from underneath us, without any prior warning and apparently acting on a ministerial whim.
We have existing local authority clients who have already commissioned the STHC from us right up to 2012-13, how are we to provide them with the service they have paid for if there isn’t any data to analyse? How is this decision going to save them money?
We are also currently in talks with the Department of Health to develop the STHC to meet the needs of the Directors of Public Health now coming into local authorities. How are we going to grow our business to support the publicly stated government agenda if there is an axe hanging over the core analysis dataset?
- **Lack of publicity** – For what is effectively a major u-turn in government data collection policy, it smacks of trying to sneak things through “on the quiet” to announce it only via a monthly, technical e-bulletin, and then as a “fait accompli”. Note that the previous month’s (June) edition gave no indication that the removal of the Mode of Travel field was even being considered in an article outlining, bullet point by bullet point, the proposed changes to the 2011-12 school census.

- **Unseemly haste** – Piecing together the trail of various DfE communications over the last few weeks would indicate that the entire process - from first “why don’t we ...?” thought out of nowhere by somebody within DfE, to the “limited” internal consultation, to the final decision, to the uncharacteristic, last minute re-issuing of official technical guidance to SIMS software suppliers - happened in less than 4 weeks. Now that’s fast for any organisation let alone the leviathan that is the Department for Education! Anyone might think that the Minister for Schools or one of his close advisors almost had a personal vendetta against mode of travel data!
- **Going against the tide of national “public good” data initiatives** - There are many “public good” national data initiatives going on right now that we and the rest of the spatial data community are doing our best to help facilitate – Open Data, Data.gov, the European INSPIRE directive on environmental data, the UK Location Program to name but a few. Your department is even actively participating in some of these – I note that school level census data is available to be downloaded from the Data.gov website.
You will know then that at their heart, these initiatives are all about “joining up” data (government collected or otherwise) and using it in new and innovative ways to help tackle the complex issues of the world. “Collect once, use many times for as many different purposes as possible” is just plain, common sense. It is widely recognised that not only will this enable better, evidence-based formulation and execution of government policy, but it will actually make government as a whole more efficient and save us all money in the longer term. Thus this decision to no longer collect at a national level a core dataset that is key to tackling issues of national interest like child obesity and climate change, is ill-founded and a serious step backwards for the UK.

In summary, I urge you to reconsider this decision as the precedent that you have set with the way it has been made and implemented has very severe implications for the UK Data Services industry and the national data initiatives your government claims to be championing. I have sent a copy of this letter to my industry body, the UK Association for Geographic Information, and asked them to also raise this issue with the National Location Council, the body responsible for the spatial aspect of the UK data infrastructure. In addition I have also written to your colleague Mark Prisk, the Minister for Business and Enterprise.

If this is the blueprint for the way in which your “transparent and open” government is approaching the development of the national data infrastructure then we, and all the other SMEs that are the backbone of the knowledge economy, might as well shut up shop now.

Yours sincerely,

Angus McDonald
*Managing Director,
 Travel Health Check Ltd.
 Knowledge Mappers Ltd.*

PS – With their permission I enclose a sample pack of some of the STHC output produced for Dorset County Council last year by way of illustration. Further digital resources are available on the STHC website www.sthc.co.uk.

Supporting Information

Note About The STHC And Knowledge Mappers / Travel Health Check Ltd.

From its origins in 2004, the School Travel Health Check (STHC) Service has been continually developed in conjunction with UK local authorities to provide key spatial intelligence information - such as the number of pupils within a realistic walking distance travelling to a school by car - to help achieve more active and sustainable travel to school. It is technically developed and delivered by Knowledge Mappers Ltd. on behalf of Travel Health Check Ltd., a consultancy made up of ex-local authority officers with over 60 collective man-years of experience in the fields of spatial analysis, local authority data and delivering sustainable travel solutions. All are committed to delivering lasting change in the field of active & sustainable travel.

STHC products and services are all about:-

- Tackling the big issues that affect the whole of society – childhood health, daily travel choices and implications for climate change, efficient provision of education and public transport services.
- Facilitating change at the local, grass-roots level, where change has to take place first in order to have any impact at the global level - “Think global, act local”.
- Providing spatial intelligence resources that enable the issues to be quantified, visualised and compared in useful and meaningful ways, on a “like – for – like” basis at multiple geographic levels – from individual school, to LEA, to wider regions and even nationally. Thus the same STHC analysis information can be used:-
 - At strategic level to provide the evidence base for better policy formulation.
 - At operational level to enable meaningful, initial engagement with all LEA schools around the issues, as well as enabling clients to target their limited, human resources on follow-up activities with those schools with the biggest potential for change.
 - At all levels to monitor the progress of change.
- Delivering professionally crafted, appropriately formatted, information resources within the challenging personal data environment.

Both Travel Health Check and Knowledge Mappers are registered with the UK Information Commissioner and successfully delivered the STHC to nearly 30 local authorities in 2009-10. In 2010 they processed over 1.6 million school census pupil mode of travel records from over 4,800 UK schools - some 22% of the LEA controlled schools in England. Furthermore as part of the Governments £560m Local Sustainable Transport Fund (LSTF) bidding process in early 2011, another 15 authorities, covering 1m pupils from 3143 schools, identified themselves as wanting to commission the STHC but were unable to do so due to lack of funds.

This unique, innovative and ground-breaking service has been cited by the Chief Medical Officer, the Department for Health, the NHS and the Sustainable Development Commission amongst others as an example of best practice. Further information on the STHC, samples of analysis output data, LEA & School level digital resources, details of 3rd party citations, client testimonials and service benefits, are available on www.sthc.co.uk.

Note About the STHC Spatial Intelligence Resources And How They Are Used

The STHC service involves the spatial analysis of school census pupil mode of travel data on behalf of client authorities to produce a comprehensive suite of intelligence output resources on an annual basis. These resources, which are a mixture of paper and digital spreadsheets, reports, maps, and technical data suitable for further analysis, report results at multiple geographic levels as well as by generic school type (primary, secondary etc.) and individual National Curriculum Year.

The STHC resources are used by officers in client authorities to annually monitor how far pupils are travelling to school, from where and by what means, and to communicate those findings and their implications with colleagues in related service areas. They also enable officers to simultaneously engage with all schools in the LEA in a meaningful and constructive way, with suggestions on what schools can do for themselves to improve the situation. At the same time they identify the schools where there is most potential to effect change in the short term - those with the most number of pupils currently travelling by car from within a realistic walking and cycling distance – so enabling more targeted use of client officers limited time.

STHC resources are also used by the schools themselves as tools for creating and maintaining their School Travel Plan, monitoring the progress of their own walking / cycling initiatives and comparing their overall travel sustainability to other schools and the authority average. As they are based on the schools own, current mode of travel data, the STHC resources can't help but facilitate debate within the school community around the important issues of healthy and sustainable travel. Also they are used as teaching resources in many areas of the curriculum.

Where the in-house capability exists, many authorities do undertake analysis of their own school census mode of travel data themselves and use the results for their own, local purposes - hence the outcry from the local authority community about the DfE decision to remove it from national census. However in our experience the in-house technical resource to do this is usually very limited (if available at all), and not always capable of producing the range of information resources required to send out to all the schools in the authority to facilitate change at grass roots level. In contrast the STHC process is the same for each authority, enabling comparison on a "like – for – like" basis at all geographic levels. We are also geared up to produce resources for schools on an authority wide basis with a turn-around time of a few days as a matter of course.

Relevant URLs

The following urls provide further information on the STHC and the proposed removal of mode of travel from national school census:-

1. Further information about the STHC - For further information on the STHC, samples of analysis output data, LEA & School level digital resources, details of 3rd party citations, client testimonials and service benefits, are available on www.sthc.co.uk.

Note: We have compiled responses from the local authority community about this issue on the "School Census" page of the Download section of the website (see www.sthc.co.uk/SchoolCensus.aspx).

2. DfE announcement to remove mode of travel from school census – contained within e-Bulletin no. 50 of the Information about children, education and schools (ICES), dated 29th July 2011 (see <http://www.education.gov.uk/schools/adminandfinance/schooladmin/ims/a0063993/information-about-children-education-and-schools-ices-bulletin-formerly-the-dsp-bulletin> and click on link for bulletin 50 on the right hand panel to view the pdf).

3. General DfE announcement about the "Root & branch review of data collections" and wider "Reducing Bureaucracy In schools" initiative dated 23rd May 2011 - see <http://www.education.gov.uk/b0075738/reducing-bureaucracy>

4. Internal Groups within DfE responsible for front line data collection

- **Star Chamber** – see <http://www.education.gov.uk/schools/toolsandinitiatives/cuttingburdens/starchamber/a0063720/what-is-the-star-chamber>)
- **Star Chamber Scrutiny Board (SCSB)** – see <http://www.education.gov.uk/schools/toolsandinitiatives/cuttingburdens/starchamber/a0063772/star-chamber-scrutiny-board-terms-of-reference>):-
- **Bureaucracy Reference Group** – see <http://www.education.gov.uk/schools/toolsandinitiatives/cuttingburdens/b0066552/bureaucracy-reference-group/>):-

5. Reaction from local government against the data policy u-turn

- **Modeshift** – *The UK Association for local authority professionals involved in the promotion of sustainable and active travel for young people and school communities. They have recently published a briefing paper outlining the facts of the recent DfE decision to drop pupil mode of travel from school census, and what their local authority members can do to lobby for its reversal. A key counter-argument to the DfE assertion that the collection of mode of travel data is a “bureaucratic burden” on schools comes from the results of an extensive consultation carried out by Modeshift earlier this year. Over 1250 schools nationwide responded and the vast majority of these stated that, not only do they not find the collection of this data an undue burden, they are actively using the collection of it as well as data itself as a teaching resource in many different areas of the national curriculum. See www.modeshift.org.uk/news/news.php*