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Consultation – summary of response

Learner Travel Operational Guidance (Revised)

19 February 2026

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
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Overview

This document provides a summary of responses to the Welsh Government's consultation on a revision of the Learner Travel Operational Guidance. This report was published on 19 February 2026

Action required

This document is for information only.

Further information and related documents

Large print, Braille and alternative language versions of this document are available on request.

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Additional copies

This summary of response and copies of all the consultation documentation are published in electronic form only and can be accessed on the Welsh Government's website.

Link to the consultation documentation: [Learner travel operational guidance 2025: consultation | GOV.WALES](#)

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Background

The Learner Travel Operational Guidance is made under section 15 of the Learner Travel (Wales) Measure 2008 (“the Measure”) which enables the Welsh Ministers to issue directions and statutory guidance. Local authorities, governing bodies of maintained schools and governing bodies of Further Education Institutions must have regard to the guidance when exercising their functions under the Measure.

The previous version of the guidance was issued in 2014. Since then, there have been two reviews into learner travel in Wales which identified a number of areas where amendments to the guidance needed to be made.

The most recent review culminated in the publication of the Learner Travel Recommendations Report 2023. It was recommended that work should start immediately on updating the guidance documents that support the legislative framework underpinning the provision of learner travel in Wales.

This consultation sought views on the draft second edition of the Learner Travel Operational Guidance. The draft guidance 2025 makes changes to the first edition of the guidance which was published in 2014.

The majority of these amendments reflected changes to legislation and policy that have taken place since the guidance came into force or clarify requirements relating to legislation that was in place at that time.

Our main aims in revising this guidance are to ensure the guidance:

- aligns with and amplifies legislative developments that have taken place since the guidance was originally published in 2014
- provides clarity on transport provision for learners with additional learning needs (ALN)
- strengthens guidance on Section 10 (promoting access to Welsh medium education) and Section 11 (promoting sustainable travel) of the Measure
- reflects some of the good practice that has been identified across Wales to encourage collaboration and partnership working between delivery partners.

A consultation process on the revised guidance started on 11 June for a 12 week period. The consultation period was scheduled to close on 3 September 2025. In August, a translation error in the Welsh version of the guidance document was identified. The translation was corrected, a short note was issued on the consultation webpage explaining the error and confirming the error had been corrected, and the deadline to the consultation process was extended by a week (until 10 September 2025) to ensure wider communication was possible.

The extension week coincided with the beginning of the school term and increased media coverage and awareness of the consultation exercise. The Cabinet Secretary for Transport and North Wales therefore took this opportunity to enable more people to engage with the consultation exercise and issued a written statement communicating his decision to extend the consultation deadline until 28 November 2025.

Context and structure of report

A total of 311 responses were received to the consultation. 283 responses were received online and 28 further responses were sent in via email. 303 responses were in English and 7 in Welsh, and 2 were provided bilingually. The 22 local authorities responded via the Association of Transport Coordinating officers (ATCO) response. Six authorities submitted an additional individual response.

A list of all organisations who consented to their names being published is available at Annex A.

The consultation coincided with the implementation of changes to Rhondda Cynon Taff County Borough Council's school transport policy. A post-code analysis showed that 230 responses - 74% of all responses - came from the Rhondda Cynon Taf (RCT) local authority area. Analysis shows that this geographic clustering has influenced the overall sentiment and highlighted local issues - especially regarding changes to mileage thresholds, "available route" assessments, safety concerns, and transport provision in rural and valley areas. As such, this report presents an analysis of the findings for the agree/ disagree questions as a whole (311 respondents) and as a 'focussed' group (81 respondents) which excludes the RCT responses; the summary of the 'key issues' raised as well as the open-ended questions takes into account all comments.

It should be noted that some totals may not align precisely due to rounding or incomplete answers.

Summary of responses

Q1. Do you agree that the updated guidance aligns with and amplifies legislative developments that have taken place since the guidance was originally published in 2014?

Response Analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	9.7	65.3	19.6	159
Focussed	81	22	29	20	33

The overall responses (311) show that only 9.7% agreed that the guidance provides clarity, while a substantial majority, 65.3% disagreed and 19.6% were neutral, indicating a strong perception that the revised guidance does not achieve this aim.

The focussed group (81 respondents) presents a more balanced view, with 22% agreeing, 29% disagreeing, and 20% neutral. This suggests that, compared to the overall sample, the focussed group is less polarised, and views are more evenly distributed.

159 of overall respondents commented on Q1 versus 33 in the focussed group.

While the overall trend points to dissatisfaction, the focussed group demonstrates greater variability and a slightly more positive outlook.

Key themes

The key themes raised from all responses have been set out below. The perceived impact of the changes made by RCT local authority are demonstrated in the wording of many of the responses.

Child safety & distance thresholds

Many respondents acknowledge the importance of clear entitlement criteria and journey time thresholds and welcome efforts to clarify guidance on these points. However, there is a strong consensus that the current 3-mile distance threshold and the proposed up to 75 minutes journey time may not always reflect the realities faced by children and young people, especially where traffic hazards, limited crossings, narrow or absent pavements, steep terrain, challenging weather conditions, or shorter daylight hours are present. Many suggest that greater emphasis on individual route risk assessments would ensure decisions are tailored to local circumstances, improving safety and providing flexibility where needed.

Equity & guaranteed access—Welsh-medium education

There is clear support for measures that guarantee and protect access to Welsh-medium education. Respondents encourage further consideration of how the guidance can better reflect the aims of Cymraeg 2050 and Welsh in Education Strategic Plans (WESPs); as well as the recently enacted Welsh Language and Education Act 2025.

Impact on disadvantaged families & learners with ALN

Respondents highlight the challenges faced by low-income households, rural and valley communities, and learners with ALN. There is recognition that some families, especially

those without access to a car, may experience financial and logistical pressures. Respondents suggested clarifying and strengthening support for ALN transport up to age 25, and ensuring guidance reflects professional evidence and individual needs, offering flexibility and appropriate funding to reduce inequalities.

Attendance, well-being & educational outcomes

There is broad agreement that well-being, attendance, and attainment should be at the heart of policy decisions. Respondents encourage the guidance to be as child-centred as possible, taking into account developmental readiness for independent travel and the impact of long journeys on fatigue, anxiety, and engagement. Ensuring travel arrangements support regular attendance and positive educational outcomes is seen as a priority.

Legislative alignment, rights & safeguarding

Respondents value close alignment with key legislation, such as the Additional Learning Needs and Education Tribunal (Wales) Act 2018 (“ALN Act 2018”), Well-being of Future Generations (Wales) Act 2015, United Nations Convention on the Rights of the Child (“UNCRC”), Welsh Language Standards and Welsh Language and Education (Wales) Act 2025 (several comments recommended that reference to the Welsh Language and Education (Wales) Act 2025 should be strengthened). There is a constructive call for the guidance to further strengthen safeguarding, non-discrimination, and human rights considerations, including clear approaches for faith-based provision.

Clarity, consistency & “postcode lottery”

The desire for clear and consistent guidance is widely shared. Respondents highlight the benefits of a more national approach to learner travel, particularly for post-16 provision, to reduce regional variation and ensure fairness. There are positive suggestions to enhance the evidentiary basis for best-practice examples and to address any perceived contradictions in the guidance.

Funding pressures & legal risk

Stakeholders appreciate the need to manage rising transport costs and recognise the complexity of funding arrangements. Some advocate for adequate national funding to ensure that travel is not a barrier to learning, and to minimise the risk of legal challenges, particularly around faith-school and Welsh-medium transport. Collaboration and dialogue are seen as key to addressing these challenges constructively.

Sustainable/active travel - infrastructure & unintended consequences

There is strong support for net-zero and active travel objectives, with respondents encouraging investment in safe infrastructure, reliable public transport, and practical supports such as cycle storage and dry rooms. Many believe that with the right infrastructure, a shift towards sustainable travel can be achieved, helping to reduce car use and congestion in line with sustainability goals.

Eligibility scope

Respondents offer constructive perspectives on eligibility, with some proposing that free transport should prioritise those with no alternatives or with ALN, while others advocate for continued support for choice-based preferences such as Welsh-medium and faith (and non-faith) schools. There is recognition of the need for an equitable approach that supports cultural and faith diversity without creating inconsistency across Wales.

Practical implementation & best-practice evidence

There is a positive appetite for clearer implementation mechanisms, including robust transport assessments in Individual Development Plans (IDPs), transparent evidence for

best practice, and the development of risk-assessment templates and co-produced standards. Respondents see these steps as key to improving oversight and delivering consistent, high-quality provision.

Operational issues & market realities

Respondents offer practical suggestions to address operational barriers, such as aligning public bus timetables with school hours, supporting multi-bus journeys, and ensuring public service vehicle accessibility requirement compliance does not adversely affect access. There is enthusiasm for expanding initiatives such as the £1 fare pilots and extending them to rail, provided there is broad provider participation. Colleges and other stakeholders call for increased coordination across local authorities and operators to enhance the overall resilience and frequency of the transport network.

Q2 — Do you agree that the guidance provides clarity on transport provision for learners with additional learning needs?

Response Analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	15.5	59.2	20.6	68
Focussed	81	25.9	33.3	25.9	26

When asked whether the guidance provides clarity, the overall responses (311) show that 15.5% agreed, while a clear majority, 59.2%, disagreed and 20.6% neither agreed nor disagreed, indicating that most respondents do not believe the guidance provides the anticipated clarity.

The focussed group (81 respondents) presents a more balanced view, with 25.9% agreeing, 33.3% disagreeing, and 25.9% remaining neutral, suggesting less polarisation and a comparatively more positive outlook within this subgroup.

The number of comments received differed with 68 comments overall compared to 26 from the focussed group, reflecting moderate engagement with this question by the focussed group.

While the majority of respondents feel the guidance lacks the clarity hoped, the focussed group demonstrates greater variability and a higher proportion of agreement.

Key themes

Although progress is acknowledged, respondents want continuous improvement of the guidance to further support learners with ALN. Recommendations for clearer guidance, bespoke assessments, enhanced funding and resources, and more robust integration with ALN plans and appeals procedures reflect a collective commitment to delivering dependable, equitable, and effective transport solutions. Continuing collaboration will be essential to ensure fair and appropriate transport provision for all learners with ALN.

Potential to strengthen clarity and consistency

Respondents emphasise the necessity of clear and consistent guidance relating to transport provision for learners with ALN. While clarity is recognised as an ongoing priority, a number

of respondents want to ensure information is both accessible and uniformly applied across local authorities. Such clarity enables families and professionals to navigate processes more confidently and affirms that learners are appropriately supported.

Prioritising individual needs

Respondents consistently advocate for guidance that acknowledges and responds to the distinct requirements of each learner and family, particularly those situated in rural or economically disadvantaged contexts. The development of individual transport assessments and plans, co-produced with families and professionals, is widely regarded as preferable to standardised approaches.

Enhancing IDP integration and appeals procedures

There is considerable support for further clarification regarding the integration of transport within a learner’s Individual Development Plan (IDP) and the accessibility of support for families seeking additional assessment. More targeted guidance in these areas is considered essential for empowering families and improving learner outcomes.

Ensuring adequate funding and resources

Feedback highlights the vital role of sufficient funding and resources in delivering effective ALN transport, especially for individuals aged 19–25 (to align with the ALN Act 2018). Improved focus in this area will help local authorities and educational institutions uphold high standards of provision, reducing pressure on families and partner organisations.

Acknowledging progress and legislative alignment

Several respondents express appreciation for the improvements evident in the updated guidance, noting its enhanced clarity and alignment with pertinent legislation, such as the ALN Act 2018. The prioritisation of inclusive, accessible transport and recognition of IDPs and named schools is valued, with ongoing refinement encouraged.

Additional Considerations:

Respondents bring attention to further issues, including the safety of walking routes, the harmonisation of ALN legislation and transport guidance (particularly for post-16 learners), and the imperative for clear communication regarding borderline or undiagnosed needs. There exists a common aspiration for increased transparency and collaboration among local authorities, schools, and families.

Q3 - Do you agree that the guidance on Section 10 (promoting access to education and training through the medium of the Welsh language) of the Learner Travel (Wales) Measure 2008 has been strengthened?

Response Analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	11.3	62.1	22.5	91
Focussed	81	27.2	34.6	28.4	44

The overall responses (311) show that only 11.3% agreed that the guidance on Section 10 of the Measure has been strengthened, while a significant majority, 62.1%, disagreed and 22.5% neither agreed nor disagreed, indicating that most respondents perceive the guidance as having not been strengthened.

The focussed group (81 respondents) presents a more balanced view, with 27.2% agreeing, 34.6% disagreeing, and 28.4% remaining neutral, suggesting less polarisation and a comparatively more positive outlook within this subgroup.

The number of comments also differs notably, with 91 comments overall compared to 44 from the focussed group, reflecting much stronger engagement from the focussed group.

These findings suggest that while the strengthening that was aimed for is generally considered insufficient, the focussed group demonstrates greater variability and a higher proportion of agreement.

Key themes

The consultation generated a wide range of thoughtful and constructive feedback from those that commented. Overall, the consultation responses reflect a shared commitment to strengthening access to Welsh-medium education and a recognition of the progress made in the revised guidance. Respondents identified practical opportunities to further clarify, reinforce, and support the implementation of Section 10.

Recognition of progress and strengthened guidance

Many respondents acknowledged that the revised guidance represents a step forward in clarifying the duties on local authorities and Welsh Ministers to promote access to education and training through the medium of Welsh.

The guidance was seen as an opportunity to reinforce the government's commitment to growing the number of Welsh speakers and supporting the aims of Cymraeg 2050. The explicit references to statutory duties, Welsh Language Standards, and the alignment with national strategies such as Cymraeg 2050 were welcomed as positive developments. Respondents suggested emphasising the more recent legislative developments namely the Welsh Language and Education (Wales) Act 2025.

Clarity and consistency in implementation

Respondents highlighted the need for further clarity in certain areas of the guidance, particularly regarding the definition of the "nearest suitable school" and the criteria for transport entitlement. There was a call for more consistent application across local authorities to ensure equitable access, with suggestions for clearer examples and case studies to support implementation.

Transport provision and parental choice

Respondents noted that, while the guidance encourages promotion of Welsh-medium education, practical barriers remain—especially where there are fewer Welsh-medium schools and longer travel distances compared to English-medium provision. Several responses emphasised that transport policy should not inadvertently disadvantage families choosing Welsh-medium education, and that equitable support is essential to uphold parental choice and the Welsh Government's language ambitions.

Legal robustness and statutory duties

Some contributors expressed concern that, without statutory changes to the Measure itself, the strengthened guidance may still be open to legal challenge or inconsistent interpretation.

There was support for making statutory duties more explicit, particularly in relation to transport for Welsh-medium learners, to provide greater certainty for both families and local authorities.

Inclusion and Equity

The importance of ensuring that Welsh-medium education is accessible to all learners, including those with ALN and those in rural or disadvantaged areas, was a recurring theme.

Monitoring, Evaluation, and Continuous Improvement

There was support for ongoing monitoring and evaluation of the guidance’s impact, with a view to continuous improvement and sharing of effective practice across Wales.

Q4 — Do you agree that the guidance on Section 11 (promoting the use of sustainable models of travel) of the Learner Travel (Wales) Measure 2008 has been strengthened?

Response analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	7.4	77.5	10.3	100
Focussed	81	22.2	45.7	18.5	42

The overall responses (311) show that only 7.4% agreed that the guidance had been strengthened, while a substantial majority, 77.5%, disagreed and 10.3% neither agreed nor disagreed, indicating a strong perception that further work is required to strengthen the guidance.

The focussed group (81 respondents) presents a more balanced view, with 22.2% agreeing, 45.7% disagreeing, and 18.5% remaining neutral, suggesting less polarisation and a comparatively more positive outlook within this subgroup.

The number of comments received, 100 comments overall compared to 42 from the focussed group, reflects stronger engagement within the focussed group.

While the majority of the respondents consider the guidance has not been strengthened, the focussed group demonstrates greater variability and a higher proportion of agreement. The vast majority of comments to this question, reflected in the key themes, demonstrate the strength of feeling generated by the changes made at a local level by RCT local authority.

Key themes

While there is broad support for the enhanced emphasis on sustainable travel in the revised guidance, respondents emphasise the need for a pragmatic and inclusive approach to implementation.

Recognition of strengthened guidance and policy alignment

In the comments, many respondents acknowledged that the revised guidance on Section 11 has been strengthened, particularly in its alignment with broader Welsh Government policies such as the Well-being of Future Generations (Wales) Act 2015 and the Active Travel (Wales) Act 2013. The guidance was seen to provide a clearer hierarchy of

sustainable travel options and to set out expectations for cooperation between local authorities and schools. The emphasis on environmental sustainability and the promotion of active and public transport were widely welcomed.

Practical barriers to implementation

Despite broad support for the principle of sustainable travel, respondents highlighted significant practical challenges. Many noted that the guidance assumes the availability of sustainable travel options, which may not exist in rural or semi-rural areas due to limited public transport, inadequate walking/cycling infrastructure, and challenging topography. There were concerns that solutions often reflect urban realities and may not be transferable to rural settings.

The climate in Wales was also raised by many respondents; safety of walking/cycling routes, and lack of facilities (e.g., for drying wet clothes) were cited as barriers to active travel, especially for younger or more vulnerable learners.

Respondents reported concerns that public transport is often unreliable, infrequent, or unavailable at suitable times, making it difficult for families to rely on these modes for school travel.

Impact on families and inclusion

Despite the revised guidance not making any changes to statutory entitlement criteria, several responses expressed concern that the withdrawal or reduction of school transport disproportionately affects low-income families, those living just under entitlement thresholds, and learners with ALN. There was a strong call for guidance to be inclusive and to ensure that sustainability goals do not inadvertently increase inequality or exclusion. Some highlighted that changes in transport provision could negatively impact access to Welsh medium and faith schools, potentially undermining policy aims to promote these educational pathways.

Unintended consequences: increased car use and congestion

A recurring theme was that, in practice, the reduction of dedicated school transport has led to a significant increase in private car use, congestion, and pollution around schools. Respondents noted that this outcome is contrary to the intended sustainability goals and may create new safety risks for children.

Need for flexibility, local solutions and further support

There was a consensus that local authorities need flexibility to adapt sustainable travel models to their specific contexts, including budgetary realities and local geography. Some respondents requested more practical advice, case studies, and examples—particularly from both urban and rural Welsh contexts—to support effective implementation whilst others cautioned that case studies can be subjective and misleading and can raise parental expectations.

The importance of partnership working between local authorities, schools, and communities was emphasised, as was the need for clear communication and engagement with parents and carers.

Constructive suggestions for improvement

Suggestions to support the ambitions of Section 11 included allowing children to use spare seats on existing school transport to reduce car journeys.

Respondents advocated for a balanced approach that considers both sustainability and the diverse needs of learners, especially those with additional needs or living in challenging circumstances.

There were also calls for continued investment in safe, accessible active travel routes and reliable public transport, as well as consideration of funding limitations faced by local authorities.

Q5 — Collaboration and partnership working: Do you agree that the guidance reflects some of the good practice that has been identified across Wales to encourage collaboration and partnership-working between delivery partners?

Response analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	4.8	68.2	20.6	67
Focussed	81	13.6	40.7	33.3	33

The overall responses (311) indicate that only 4.8% agreed that the guidance provides clarity, while a significant majority (68.2% disagreed) and 20.6% neither agreed nor disagreed, suggesting that most respondents perceive the guidance as not achieving its aims.

The focussed group (81 respondents) shows a more balanced distribution, with 13.6% agreeing, 40.7% disagreeing, and 33.3% remaining neutral, indicating less polarisation, though still indicating a broad perception within this subgroup that the guidance will not achieve its aims.

The number of comments also differs notably, with 67 comments overall compared to 33 from the focussed group, reflecting more engagement across the focussed group.

Key themes

While the revised guidance is recognised as a positive step towards fostering collaboration and partnership-working, respondents are keen to see greater detail, more practical examples, and stronger mechanisms to ensure consistency and inclusivity. By addressing these areas, the respondents believe that the guidance can better support delivery partners in embedding good practice and achieving equitable, high-quality learner transport services across Wales.

Recognition of collaborative intent and good practice

Many respondents acknowledged that the guidance makes a clear effort to promote collaboration and partnership-working between delivery partners. There is appreciation for the inclusion of positive examples and references to best practice, particularly where these are aimed at improving consistency and fairness in learner transport services across Wales. The emphasis on co-production, partnership with the third sector, and engagement with learners and their families is seen as a step in the right direction.

Call for greater detail and practical examples

A recurring theme is the desire for more detailed sharing of good practice. Respondents suggest that the guidance would benefit from the inclusion of specific case studies or practical examples as appendices. This would help delivery partners understand how to embed collaborative approaches in day-to-day practice and ensure that good practice is not just aspirational but actionable and replicable across different local authorities.

Addressing gaps and inconsistencies

Several comments highlight ongoing gaps in provision, particularly for certain groups such as 16–18 year olds, learners in Welsh-medium education, and those with additional learning needs. There is concern that collaboration is not always consistent across regions, and that some local authorities may not be fully engaging with all relevant partners, including schools, parents, and transport providers. Respondents call for clearer frameworks, shared accountability, and mechanisms for monitoring collaboration to ensure that good practice is standardised rather than variable.

Importance of inclusive and balanced partnership

Respondents stress the importance of ensuring that all stakeholders—including faith schools, Welsh-medium schools, and families from diverse backgrounds—are proactively included in partnership arrangements. There are concerns that an unbalanced approach could lead to marginalisation or unintended consequences, such as local authorities being pressured by specific interest groups. The guidance is encouraged to set out how inclusive, balanced, and transparent collaboration can be achieved.

Opportunities for improvement and solution-focused suggestions

While the guidance is generally welcomed, several respondents offer constructive suggestions for improvement:

- Publish best practice case studies alongside the guidance to support learning and replication
- Strengthen mechanisms for cross-sector collaboration, particularly between local authorities, schools, transport providers, and the third sector
- Ensure that the learner voice, especially those with additional learning needs, is central to consultation and feedback processes
- Address inconsistencies in policy application, such as transport distance thresholds and discretionary arrangements, to reduce postcode lotteries and promote equity.

Constructive critique of current practice

Some respondents noted that collaboration is often inconsistent or under-resourced, with instances of siloed working and limited engagement with families and communities. They recommend that the guidance move beyond aspirational statements by providing practical, actionable measures to support genuine partnership-working. The need for ongoing monitoring and evaluation is also highlighted to ensure collaborative approaches deliver positive outcomes for all learners.

Q6 — Maximum journey time guidance: Do you agree that the inclusion of a general guide on maximum journey times will help increase consistency across local authorities?

Response Analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	11.6	62.7	8.4	104
Focussed	81	23.5	43.2	17.3	39

When asked whether the inclusion of a general guide on maximum journey times will help increase consistency across local authorities, the overall responses (311) show that only 11.6% agreed, while a clear majority (62.7% disagreed) and 8.4% neither agreed nor disagreed, indicating that most respondents do not believe this addition will achieve greater consistency.

The focussed group (81 respondents) presents a more balanced view, with 23.5% agreeing, 43.2% disagreeing, and 17.3% remaining neutral, suggesting less polarisation and a comparatively more positive outlook within this subgroup.

104 comments from respondents in the overall group compared to 39 from the focussed group, reflects strong engagement and sentiment for this question.

While most respondents are sceptical about the effectiveness of including a general guide on maximum journey times, the focussed group demonstrates greater variability and a higher proportion of agreement.

Key themes

Broad support for consistency with important caveats

Many respondents recognise the value of a general guide on maximum journey times as a step towards greater consistency across local authorities. There is a general sense that clear guidance can help standardise expectations and practices, reducing disparities in provision between areas. However, this support is often conditional on the guidance being applied flexibly and with sensitivity to local circumstances.

Need for flexibility and local context

A recurring theme is the need for the guidance to account for the diverse geography and demographics of Wales. Respondents highlight that rural, urban, and valley areas face very different challenges regarding transport infrastructure, journey times, and access to schools. Many caution that a “one-size-fits-all” approach could inadvertently disadvantage certain groups, particularly those in rural areas, learners attending Welsh-medium or faith schools, and those with ALN or medical conditions.

Concerns about maximum journey times

There is significant concern that the proposed maximum journey times - particularly 75 minutes each way for secondary school learners - are too long for many children. Respondents question the evidence base for these figures and raise issues around the impact on wellbeing, learning, and participation in extra-curricular activities. Several suggest

that journey times should be shorter, especially for younger children, and that the guidance should explicitly consider factors such as terrain, weather, and the need to carry equipment.

Importance of individual needs and wellbeing

Many responses stress that consistency should not come at the expense of individual learners’ needs. There is strong support for guidance that allows for exceptions based on professional assessments, particularly for children with ALN, disabilities, or health conditions. Respondents urge that wellbeing, safety, and inclusion must remain central considerations.

Implementation, monitoring, and enforceability

Some respondents express concern that, as a “guide” rather than a statutory requirement, the policy may be interpreted inconsistently by different authorities. There are calls for clearer, enforceable standards, regular monitoring, and transparent processes for making exceptions. Without these, there is a risk that the guidance could become a “tick-box” exercise rather than a meaningful tool for equity.

Additional practical considerations

Respondents raise a range of practical issues, including:

- The need for safe, reliable, and affordable transport options, especially in areas with limited public transport
- The importance of considering walking times separately from overall journey times
- The impact of transport policy on attendance, family logistics, and environmental outcomes
- The need for clear communication and consultation with families and communities.

Q7 — Embedding UNCRC general principles: Do you agree that the guidance has been strengthened to embed the 4 general principles of the UN Convention on the Rights of the Child?

Response Analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	9	62.7	11.6	96
Focussed	81	23.5	43.2	19.8	39

When asked whether the guidance has been strengthened to embed the four general principles of the UNCRC, the overall responses (311) show that only 9% agreed, while a clear majority (62.7% disagreed) and 11.6% neither agreed nor disagreed, indicating that most respondents do not believe the guidance sufficiently embeds these principles.

The focussed group (81 respondents) presents a more positive outlook, with 23.5% agreeing, 43.2% disagreeing, and 19.8% remaining neutral, suggesting less polarisation and a comparatively higher level of confidence in the guidance among this subgroup. The number of comments received, 96 comments from the overall group and 39 from the focussed group, reflect strong engagement and provide valuable insights.

Key themes

The guidance is recognised as a positive step towards embedding the UNCRC principles, respondents believe further work is needed to ensure these principles are fully realised in practice. Respondents believed the guidance could be developed further by addressing the highlighted gaps—particularly around equity, safety, and meaningful participation.

Commitment to children’s rights recognised, but implementation gaps remain

Many respondents acknowledged that the guidance references the UNCRC and encourages a rights-based approach. There is appreciation for the intention to embed the four general principles within policy and practice. However, a recurring theme is that these principles are not yet consistently or meaningfully applied in the specific context of learner travel, particularly regarding the expectation that children may travel unaccompanied for up to three miles.

Concerns about non-discrimination and equity

Although the revised guidance is not making any changes to entitlement, respondents highlighted that the removal or reduction of school transport provision may disproportionately affect children from lower-income families, rural areas, those with ALN or disabilities, and those attending Welsh-medium or faith schools. This raises concerns about equality of access to education and the risk of indirect discrimination. Several comments called for more robust mechanisms to assess and address the needs of vulnerable groups, ensuring that no child is disadvantaged due to geography, socio-economic status, or other factors.

Best interests of the child and safety

A significant number of responses questioned whether the best interests of the child are being prioritised, particularly where decisions appear to be driven by cost-efficiency rather than individual needs. Concerns were raised about the safety and wellbeing of children expected to walk long distances, especially in adverse weather or along perceived unsafe routes. Respondents emphasised the importance of thorough, individual risk assessments and the need for local authorities to consider the developmental appropriateness and safety of travel arrangements.

There is a strong view that the removal of transport provision could threaten children’s physical safety, health, and educational development, particularly for those with complex needs or unsafe walking routes. Respondents stressed the government’s obligation to ensure that all children can develop to their full potential in a safe and supportive environment.

Respect for the views of the child

While the guidance encourages learner participation in the consultation process for any policy changes, many respondents felt that children’s voices are not sufficiently heard or acted upon in individual cases. There is a call for clearer processes to ensure that children and young people can express their views and have them considered, especially when they or their families believe a travel arrangement is unsafe or unreasonable.

Faith and Welsh-medium education

Some responses noted that the guidance does not fully address the needs of children attending faith or Welsh-medium schools, with concerns about equitable access to transport and the potential for indirect discrimination. There were suggestions for clearer guidance and consistent application of discretionary powers to support attendance at these schools.

Q8 — Do you have any further comments you wish to make about part 1 of the guidance (Operational Guidance)?

Response analysis

Out of 311 individuals who participated in the consultation, 109 provided comments in response to this specific question. The substantial number of responses suggests that many participants felt motivated to share their perspectives, experiences, and constructive feedback, contributing valuable insights to inform future policy development.

Key themes

The consultation responses reflect a deep commitment to ensuring safe, equitable, and sustainable access to education for all learners in Wales. While the operational guidance provides a valuable framework, there is clear appetite for further refinement—particularly around safety, flexibility, consistency, and support for vulnerable groups.

Safety and accessibility

A predominant concern is the safety of children expected to walk long distances—often up to three miles—to school. Respondents highlight risks associated with poor weather, inadequate pedestrian infrastructure, and increased traffic congestion near schools. Many feel that current guidance does not sufficiently address the realities of Welsh terrain, urban and rural differences, or the vulnerability of younger and ALN learners. There is a strong call for transport provision to prioritise safety, especially for those living in areas with challenging routes or limited public transport options.

There were consistent calls to revisit the statutory distance thresholds and incorporating more flexible, child-centred assessments of route safety and suitability.

Respondents believed that enhanced collaboration with local authorities to regularly review and improve walking routes and transport options could further support safe access to education.

Impact on families and communities

Many respondents express concern about the practical impact of the guidance on working families, particularly those with limited access to private vehicles or reliable public transport.

The removal or reduction of school transport is seen as disruptive to employment, family routines, and overall wellbeing. There is also apprehension about increased financial strain, especially for low-income households and single parents. (Please note the revised guidance does not change the statutory entitlement criteria for learner travel)

Environmental and social consequences

Several comments note that the guidance's intent to promote net zero and sustainable travel may be undermined by increased car journeys resulting from reduced school transport. This shift is perceived to contribute to higher emissions, congestion, and safety risks around schools, counteracting broader environmental goals.

Consistency, clarity, and accountability

Respondents frequently mention inconsistencies in how the guidance is interpreted and applied across Wales, leading to a “postcode lottery” in learner transport provision. There is a desire for clearer minimum standards, robust accountability mechanisms, and enforceable processes for appeal and redress.

Support for Welsh-medium and faith-based education

The guidance's impact on access to Welsh-medium and faith schools is a recurring theme. Respondents note that the three-mile rule may disproportionately affect learners seeking Welsh-medium education, especially in areas with limited provision. There are also concerns about equitable transport support for faith and non-faith schools.

Learner wellbeing and inclusion

There is widespread agreement that operational guidance should be more responsive to the needs of vulnerable learners, including those with ALN, disabilities, or complex family circumstances. Respondents advocate for a genuinely child-centred approach, with professional input and safeguarding considerations given due weight in decision-making.

Q9 — Do you have any further comments you wish to make about part 2 (Assessment of 'available route' to school)?

Response rate

Out of 311 people, 152 provided comments, resulting in a response rate of approximately 49%. This is a notably strong level of engagement, indicating that the topic of assessing 'available routes' to school resonates with stakeholders and elicits considerable interest and concern.

Key themes

The consultation responses reflect a strong commitment to ensuring safe, equitable, and accessible routes to school for all children. While there are concerns raised about current practices, there is also a wealth of constructive feedback and practical suggestions for improvement. By strengthening risk assessment procedures, enhancing transparency, and prioritising the needs of vulnerable learners, respondents suggest that government policy can better support families and uphold the right to safe education.

Safety and suitability of routes

A predominant concern is the safety of walking routes, especially for younger children and those with ALN. Respondents highlight issues such as:

- Dangerous roads, lack of pavements, poor lighting, and exposure to fast-moving traffic
- Increased risks during winter months due to darkness, adverse weather, and flooding
- Routes deemed "available" on paper may be unsuitable in practice, lacking safe crossings and adequate infrastructure.

Impact on children and families

Numerous respondents voiced concerns regarding the physical and emotional toll on children obliged to walk what are perceived to be considerable distances to school, with some journeys exceeding an hour each way. Responses suggested that these extended walks can lead to heightened anxiety, fatigue, and a diminished capacity to focus during lessons. Such demands also place considerable strain on families, particularly those juggling work or caring responsibilities. Concern was raised that the combination of these challenges, especially during adverse weather, increases the risk of absenteeism and lateness, further compounding the difficulties faced by both children and their families.

Accessibility and inclusion

Concerns were raised about the inclusivity of the assessment process, particularly for disabled learners and those with ALN. Respondents note:

- The need for individual travel assessments and reasonable adjustments for disabled children, regardless of distance
- Risks of discriminatory outcomes if standard eligibility rules are applied rigidly.

Transparency, consultation, and appeals

Respondents advocated for enhanced transparency and engagement throughout the assessment process, emphasising the importance of clear communication regarding evaluated routes and risk assessments to both parents and schools. Some respondents requested mechanisms for families to review and contest decisions; however, others advised caution in adopting policies that could inadvertently result in an increase of unwarranted parental challenges.

Some advocated for regular consultation with stakeholders, such as independent assessors and learner representatives, while others expressed concern that such engagement could lead to increased conflict and potentially compromise the objectivity of the assessment process.

Community and environmental impact

There were a number of comments noting that the withdrawal of school transport in specific areas has increased traffic congestion and pollution around schools; caused disruption to local communities and residential areas and undermined efforts to promote sustainable travel and reduce emissions.

Clarity and consistency

Numerous respondents have raised concerns regarding the ambiguity and inconsistency in the guidance. In particular, they note the absence of clear definitions for terms such as “available route” and “suitability” which has resulted in variations in how local authorities assess routes and, consequently, perceptions of inequality among stakeholders.

Q10 — Do you have any further comments you wish to make about part 3 (Learner Travel Information (Wales) Regulations 2009)?

Response analysis

Of the 311 respondents to the consultation, 63 provided substantive comments, representing a response rate of approximately 20%. While this level of engagement is relatively low compared to other questions, it nonetheless offers a valuable cross-section of perspectives.

Key themes

The responses reflect a strong commitment to ensuring that learner travel arrangements are safe, equitable, and support access to education. While there are clear concerns about current challenges, the feedback provides some practical, solution-oriented suggestions.

Safety and accessibility

A significant number of respondents expressed concerns about the safety and practicality of current transport arrangements, particularly for children required to walk long distances (up to three miles) to school. Many highlighted risks associated with unsafe walking routes, adverse weather, heavy traffic, and the physical burden on children carrying school equipment. There were calls for more robust risk assessments, clearer definitions of “safe” and “suitable” routes, and greater consideration of seasonal and developmental factors.

Respondents emphasised that ensuring safe, accessible transport is fundamental to supporting attendance and wellbeing.

Communication, information, and transparency

Many responses pointed to inconsistencies and shortcomings in how local authorities and the Welsh Government communicate learner travel information. Issues included complex or inaccessible language, lack of timely updates, and insufficient provision of information in accessible formats (including Welsh and formats suitable for children and young people, especially those with ALN). Respondents advocated for enforceable standards on content, regularity, and accessibility of information, as well as clearer processes for appeals and complaints. There was a strong desire for transparent, plain-language communication that empowers families to make informed decisions.

Equity and inclusion

Concerns were raised about the impact of current policies on disadvantaged families, especially those with lower incomes, learners with ALN, and families for whom English or Welsh is not a first language. Respondents noted that lack of accessible transport and information can disproportionately affect these groups, potentially undermining equal access to education. There were calls for discretionary transport support for families just outside entitlement thresholds and for clearer guidance on supporting vulnerable learners.

Policy implementation and local authority practice

Several comments highlighted variability in how local authorities interpret and implement the guidance, leading to perceived unfairness and confusion. Respondents suggested that clearer frameworks and accountability mechanisms are needed to ensure consistent application of discretionary powers, timely consultation on policy changes, and effective route assessments. Some recommended that, where appeals are unresolved before the start of term, previous transport arrangements should remain in place to avoid disruption.

Impact on families and communities

Respondents described the broader effects of transport policy changes, including increased traffic congestion, disruption to family routines, and heightened stress for parents and carers. There were concerns that removing or reducing school transport could lead to lower attendance, reduced access to Welsh-medium education, and negative impacts on community cohesion. Some respondents also noted the contradiction between these changes and wider goals such as reducing emissions and supporting active travel.

Q11 —Do you have any further comments you wish to make about part 4 (Safety on learner transport)?

Response analysis

102 comments were received out of 311 total responses to the consultation question on Part 4 - safety on learner transport, indicating a high level of engagement and concern among stakeholders regarding learner transport safety. Many respondents felt strongly enough about the issue to articulate specific experiences, suggestions, and criticisms, reflecting both the complexity and the personal impact of the perceived changes.

Key themes

The consultation responses reflect a strong commitment among respondents to ensuring the highest possible safety standards for learner transport.

Walking distances and route safety

Many respondents voiced serious concerns regarding the expectation for children to walk considerable distances to school, frequently referencing the 3-mile threshold. They highlighted a range of safety issues, such as walking routes that are unlit, lacking pavements, or necessitating the crossing of busy roads. These risks are exacerbated during winter, with darkness, adverse weather, and poor visibility further compromising safety. Respondents also emphasised the physical and emotional toll on children, including fatigue, anxiety, and a diminished capacity to participate fully in learning after undertaking lengthy and challenging journeys. Particular apprehension was expressed for vulnerable groups, including girls, learners with ALN, and those living in rural or isolated locations.

Impact of reduced or removed school transport provision

Respondents highlighted that the reduction or withdrawal of dedicated school transport services in their areas has resulted in a rise in car journeys, which in turn has contributed to increased traffic congestion, higher levels of pollution, and heightened safety risks in the vicinity of schools. This shift has placed additional strain on parents and carers, many of whom have been forced to alter their work commitments or find alternative arrangements, often at considerable personal or financial expense. There is also growing concern that, due to the impracticality or perceived dangers associated with the journey to school, some children may be absent more frequently.

Safety standards and enforcement

There is a strong call for clearer, enforceable safety standards for all forms of learner transport, including:

- Consistent risk assessments of walking and transport routes, especially during peak times and adverse weather
- Regular audits, robust contractor vetting, and clear protocols for safeguarding, incident reporting, and appeals
- The need for seatbelts on all buses used for learner transport, not just dedicated school buses.

Support for vulnerable and learners with ALN

Respondents identified notable shortcomings in the existing guidance when it comes to supporting vulnerable children and those with ALN. They stressed the need for more comprehensive operational details, particularly around collaboration with ALN teams, the provision of travel training, and tailored support for learners facing emotional, sensory, or cognitive challenges. The provision of trained escorts or passenger assistants was seen as crucial, especially for children with complex medical or behavioural requirements. Additionally, concerns were raised about the absence of clearly defined responsibilities and procedures for handling emergencies or administering medication.

Communication, consultation, and learner voice

Numerous respondents highlighted the need for transparent communication with families regarding safety guidelines, route evaluations, and any alterations to transport services. They also stressed the importance of establishing effective channels for parents and learners to provide feedback, along with clear procedures for reporting and resolving safety concerns. Furthermore, there was a strong emphasis on the necessity of conducting meaningful consultations with the communities affected, especially when changes to transport provision are being considered.

Positive feedback and constructive suggestions

While most comments raised concerns, some respondents acknowledged positive aspects of the guidance, such as the inclusion of travel escorts and clarity on certain legal requirements. Some suggestions for improvement included:

- Seasonal reviews of route safety (e.g., considering winter darkness).
- Enhanced training for drivers and escorts in safeguarding, behaviour management, use of tailgates/ clamps
- Greater flexibility and individualisation in transport decisions, especially for ALN learners.

Q12 — Do you agree that the update to the guidance is clear and easy to understand?

Response analysis

Group	Total responses	Agree (%)	Disagree (%)	Neither agree nor disagree (%)	No. of comments
Overall	311	9.3	67.2	17	68
Focussed	81	21	46.9	16	33

The overall responses (311) show that 9.3% respondents agreed, while a clear majority, 67.2%, disagreed and 17% neither agreed nor disagreed, indicating that most respondents do not find the updated guidance clear or easy to understand.

The focussed group (81 respondents) presents a more positive response, with 21% agreeing, 46.9% disagreeing, and 16% remaining neutral, suggesting that although the distribution is slightly less polarised, concerns about clarity still remain within this subgroup.

The number of comments received also differs, with 68 comments from the overall group compared to 33 from the focussed group, reflecting stronger engagement from the focus group providing valuable qualitative insights into the reasons behind these views.

Q13 — What, in your opinion, would be the likely effects of the draft guidance on the Welsh language? We are particularly interested in any likely effects on opportunities to use the Welsh language and on not treating the Welsh language less favourably than English. Do you think that there are opportunities to promote any positive effects? Do you think that there are opportunities to mitigate any adverse effects?

Response analysis

145 out of the 311 respondents provided a response to this question, suggesting a strong sense of engagement.

The volume and diversity of comments for q.13 and q.14 reflect a broad spectrum of views, ranging from strong advocacy for enhanced support for Welsh-medium education, to concerns about equity, practical barriers, and the need for clear, consistent policy.

The number of responses identifies some key themes and constructive recommendations. It demonstrates that the Welsh language remains a central consideration in policy discussions about learner travel, and that any changes to guidance are likely to be closely scrutinised by a substantial segment of the community.

Key themes

Access to Welsh-medium education

A significant proportion of respondents expressed concern that the draft guidance, particularly perceived changes to school transport entitlement (such as increased walking distances and reduced transport provision), could reduce access to Welsh-medium education. Many families rely on school transport to access Welsh-medium schools, which are often further away than English-medium alternatives. Without adequate transport, there is a risk that parents will opt for closer English-medium schools, potentially leading to a decline in Welsh-medium enrolment and, by extension, opportunities to use the Welsh language.

Potential for unequal treatment

Several responses highlighted the risk that the draft guidance could inadvertently treat the Welsh language less favourably than English. This is primarily because the distribution of Welsh-medium schools is less dense, making them less accessible without dedicated transport support. Respondents stressed that policies should ensure parity of access, so that choosing Welsh-medium education does not become a disadvantage due to logistical or financial barriers.

Impact on parental choice and community cohesion

Concerns were raised that the proposed changes could limit genuine parental choice, especially for those wishing to pursue Welsh-medium education for their children. There is a perceived risk that the guidance could unintentionally undermine efforts to promote the Welsh language, particularly in rural or disadvantaged communities where alternative options are limited.

Opportunities for positive change

Despite these concerns, many respondents offered constructive suggestions for how the guidance could be strengthened to support the Welsh language:

- Guaranteeing transport to the nearest Welsh-medium school, regardless of distance, to ensure equitable access.
- Ring-fenced funding or national standards for Welsh-medium transport provision to ensure consistency across local authorities.
- Stronger language impact assessments in transport policy decisions, ensuring that the effects on the Welsh language are actively considered and mitigated.
- Clearer communication and consultation with stakeholders, including families and advocacy groups, to ensure policies reflect community needs and aspirations.

Recognition of existing good practice

Some respondents acknowledged that, in certain areas, local authorities already provide free transport to Welsh-medium schools and that the revised guidance could help clarify and reinforce these positive practices. There is an opportunity to build on these examples to ensure best practice is shared and adopted more widely.

Balancing language promotion with other priorities

A minority of responses suggested that the focus should remain on child safety, educational access, and parental choice, rather than language policy alone. However, even among

these, there was recognition that equitable access to education—regardless of language medium—is a fundamental principle.

Q14 — In your opinion, could the draft guidance be formulated or changed so as to:

- **have positive effects or more positive effects on using the Welsh language and on not treating the Welsh Language less favourably than English; or**
- **mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?**

Response analysis

Out of a total of 311 respondents to the consultation, 92 specifically commented on the question regarding whether the draft guidance could be formulated or changed to have positive effects on the Welsh language, or to mitigate any negative effects. This represents approximately 30% of all participants.

This response rate indicates a significant level of engagement with the issue of Welsh language provision.

Key themes

The consultation responses reflect a strong desire for learner travel guidance to actively support the Welsh language, remove barriers to access, and ensure that Welsh-medium education is not treated less favourably than English.

Transport policy as a lever for Welsh language promotion

Many respondents highlighted that learner travel policy can play a pivotal role in supporting the Welsh language. Several suggested that extending free or subsidised transport to Welsh-medium schools—especially for those living within the current 3-mile exclusion zone—would remove barriers and encourage families to choose Welsh-medium education. This is seen as essential for both language acquisition and cultural preservation. It was noted that most local authorities are already offering free transport to the closest Welsh medium school.

Equitable access and avoiding disadvantage

A recurring theme was the need to ensure that Welsh-medium learners are not disadvantaged compared to their English-medium peers. Respondents called for explicit safeguards in the guidance to guarantee transport to the nearest suitable Welsh-medium school, regardless of distance, and to remove restrictive criteria that may prevent access. Consistency across local authorities was emphasised to avoid a “postcode lottery”. Despite perception, it was noted that most local authorities are already offering free transport to the closest Welsh medium school.

Impact of distance and geography

Respondents noted that longer travel distances and challenging terrain can disproportionately affect access to Welsh-medium education. Suggestions included reinstating maximum journey times, introducing a maximum walking time, and ensuring that topography is properly considered in transport decisions.

Financial barriers and social equity

Concerns were raised about the financial implications for families needing to pay for transport to Welsh-medium schools. Respondents argued that cost should not be a barrier to accessing education in the Welsh language, and that national funding or ring-fenced resources may be necessary to support equitable access.

Promotion and visibility of Welsh-medium education

Several responses advocated for a more proactive approach to promoting Welsh-medium education, beyond simply ensuring parity with English. This includes embedding Welsh language promotion in travel policies, providing clear communication to families, and ensuring that guidance aligns with national language strategies such as Cymraeg 2050 and the Welsh Language and Education (Wales) Act 2025.

Consultation and stakeholder engagement

There was a call for meaningful engagement with Welsh language advocacy groups, schools, and families in the development and revision of local authority policies. Respondents suggested that consultation requirements should be strengthened to ensure that diverse perspectives are considered.

Balancing cost and commitment to Welsh language

While recognising budgetary constraints, many respondents urged the government to balance cost considerations with its commitment to the Welsh language. They emphasised that policy changes should not undermine efforts to increase the number of Welsh speakers or the accessibility of Welsh-medium education.

Q15 — We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them:

Response analysis

Of the 311 total consultation respondents, 98 (approximately 32%) chose to provide additional comments on issues not specifically covered by the main consultation questions. This is a significant proportion, indicating a high level of engagement and a strong desire among respondents to ensure their broader concerns and perspectives are heard.

This level of participation in the open-ended section highlights the complexity of the subject matter and the diversity of experiences and viewpoints.

A number of the key themes from this section reflect the key themes that came out of the whole consultation exercise.

Key themes

Safety and suitability of routes

One of the predominant concerns raised relates to the safety of walking routes to school, especially for younger pupils and those with additional learning needs. Respondents pointed out numerous hazards, including dangerous roads, the absence of pavements, inadequate lighting, and fast-moving traffic. They also noted that these risks are heightened during the winter months, when darkness, adverse weather conditions, and flooding are more common. Furthermore, there is a discrepancy between routes that are officially classified as

“available” and their actual suitability in practice, with some lacking safe crossings or sufficient infrastructure to ensure children’s safety.

Equity and accessibility

Concerns were raised about the impact of transport changes on working parents, learners with ALN, and those requiring Welsh-medium education. Key points included:

- The need for interim or parent-paid seats where capacity exists.
- Calls for explicit ALN provisions and alignment with the UNCRC.
- Ensuring that changes do not disproportionately affect families unable to flex work schedules or those in rural areas.

Communication and transparency

Respondents highlighted the crucial need for transparency in the decision-making process. They advocated for the publication of route audits and risk assessments prior to any changes, alongside the provision of clear and accessible information for parents, carers, and schools. Furthermore, they stressed the importance of keeping all stakeholders informed about the reasons behind decisions and the subsequent steps to be taken.

Practical implementation and policy alignment

There was significant interest in implementing practical solutions and establishing clear policies, including reducing distance and journey time thresholds, with consideration for a cap of 60 minutes where relevant. Another area of focus involved resolving cross-border concerns, particularly for looked-after children and learners placed outside their local area. Additionally, it was emphasised that guidance should incorporate legislative changes and reflect best practices throughout Wales.

Local context and stakeholder engagement

Many responses referenced specific local authority changes (notably in RCT) and called for: Greater engagement with local authorities, schools, and transport providers. Ongoing opportunities for feedback and involvement in implementation and evaluation stages.

Next steps

The Welsh Government is committed to continuously improving learner travel provision. The Welsh Government will continue to carefully consider all responses received during the consultation process.

The responses outline the complexities of achieving the aims of revising the guidance. Local authorities, and other key delivery partners, have been waiting for revised guidance to be published. We will therefore make necessary, factually based amendments to the draft guidance based on the feedback received to improve clarity and effectiveness.

We will aim to publish the updated guidance before the end of this Senedd term to give local authorities sufficient time to review their own local policies to ensure they align with the new guidance.

It must be stressed that this revised guidance does not change the statutory entitlement criteria that local authorities are already working to.

The comments from this consultation exercise, along with other engagement activity that has taken place may form part of the evidence base for a new Welsh Government if they want to make further changes in this policy area.

Annex A – List of organisations that responded

The following organisations were happy for their name to be attributed to a consultation response rather than being kept anonymous. We have not published names of individuals, but all comments have been reviewed and analysed.

Organisations

Association of Transport Co-ordinating Officers Cymru
The Catholic Education Service
Cerebra
Ceredigion County Council
The Church in Wales
Children's Commissioner for Wales
Colegau Cymru
Coleg Cymraeg Cenedlaethol
Conwy County Borough Council
Cyngor Gwynedd
Gladestry Governors
Learning Disability Wales
Mathern Community Council
Mary Immaculate High School
National Secular Society
Neath Port Talbot County Council
NEU Cymru
Plaid Cymru
Rhondda Cynon Taff County Borough Council
RCT Save the School Transport Campaign Group
RhAG
Undeb Cenedlaethol Athrawon Cymru
Ysgol Maes Y Coed
Wales Humanists
Welsh Language Commissioner
Wrexham County Borough Council