**Learner travel operational guidance 2025**

**Consultation response form**

Your name:

Organisation (if applicable):

Email/Telephone Number:

Your address:

Responses should be returned by 3 September 2025 to: Posts (Atom)

Learner Travel Consultation

Public and Integrated Transport Division

Transport and Digital Connectivity

Welsh Government

Cathays Park

Cardiff

CF10 3NQ

or completed electronically and sent to:

email: bus@gov.wales (subject: Learner Travel Consultation)

**Question 1** – 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?

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| Agree | [x]  | Disagree | [ ]   | Neither agree nor disagree | [ ]   |

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| Comments:We very much welcome that the guidance is being updated. The guidance on Section 10 (promoting access to Welsh-medium education) is much stronger in the revised version and reflects important legislative developments such as the Welsh Language (Wales) Measure 2011. The Welsh Language and Education (Wales) Act 2025 has very recently received royal assent, and where relevant the guidance should reflect the duties which arise from this act. |

**Question 2** – Do you agree that the guidance provides clarity on transport provision for learners with additional learning needs?

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| Agree | [x]  | Disagree | [ ]   | Neither agree nor disagree | [ ]   |

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| Comments:  |

**Question 3** – 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?

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| Agree | [x]  | Disagree | [ ]   | Neither agree nor disagree | [ ]   |

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| Comments:The revised guidance is much stronger in relation to the duty on Welsh ministers and local authorities to promote access to education and training through the medium of Welsh. We have a few comments below in terms of how some aspects could be further strengthened:**Nearest suitable school (paragraphs 71-75)**Paragraph 73 (nearest suitable school) of the guidance states that the Measure does not impose a duty on local authorities to provide free transport to a particular type of language provision preferred by parents or learners. While we accept that this is factually correct from one point of view, the guidance also refers in many places to the legal duty on local authorities to promote access to Welsh-medium education. It is difficult to see how not providing transport to a Welsh-medium school would be consistent with the duty to promote access to Welsh-medium education. We believe that it would therefore be beneficial for this paragraph (or the previous paragraph, paragraph 72) to state that local authorities should consider **their statutory duty** to promote access to Welsh-medium education when considering the nearest suitable school. Paragraph 88 of the guidance is clearer in this context.We welcome that the 'best practice' box under paragraph 75 suggests that local authorities should consider the aspirations of parents and learners to choose a Welsh-medium school. Referring to this as 'best practice' is somewhat misleading given that promoting access to Welsh-medium education is a statutory requirement under the Measure. We believe that it would be more appropriate for the guidance to note that this is the Welsh Government's **expectation.****Transport for learners of non-compulsory school age (paragraphs 112-115)**We accept that other sections of the guidance refer to the importance of considering Welsh-medium provision when providing transport on a discretionary basis. However, we believe that the guidance would be stronger if this section specifically referred to the need for local authorities to consider the accessibility of post-16 education through the medium of Welsh. The lack of transport provision to post-16 education often means that Welsh-medium education is much less accessible than English-medium provision.**Promoting access to education and training through the medium of Welsh (paragraphs 121-129)**We very much welcome that this section refers specifically to the requirements of the Welsh Language (Wales) Measure 2011 and that local authorities need to consider the duties imposed on them under the Welsh language standards regime alongside the duties they have under section 10 of the Learner Travel (Wales) Measure 2008. We believe that it would be useful to refer to the Commissioner's advice and resource documents which provide guidance to public bodies on the policy-making standards, including how conscientious consideration should be given to the impact of decisions on the Welsh language. The Commissioner has [a dedicated webpage](https://www.welshlanguagecommissioner.wales/support-resources/public-organisations/policy-decisions) which includes a range of resources, including a Code of Practice, guidance and seminars on consultations and impact assessment procedures. The Commissioner is currently preparing specific guidance and a templates for local authorities when assessing the impact of policy decisions relating to education. This guidance will be published within the next few weeks. While paragraphs 121 and 122 are clear and robust, it would be useful to list some examples of how local authorities should promote access to Welsh-medium education when carrying out functions under the Measure. For example:* In determining the meaning of the nearest suitable school
* In deciding whether to provide transportation to post-16 education on a discretionary basis
* In deciding whether to provide transportation to nursery education on a discretionary basis
* When deciding on distance thresholds for free transport provision
* When making transport arrangements for Welsh-medium ALN provision
* When making other transport arrangements, for example when making transport arrangements for Welsh-medium provision where parents will pay

This section should refer to the Welsh Language and Education (Wales) Act 2025 as well. |

**Question 4** – 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?

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| Agree | [ ]  | Disagree | [ ]   | Neither agree nor disagree | [ ]   |

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| Comments: |

**Question 5** – 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?

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| Agree | [ ]  | Disagree | [ ]   | Neither agree nor disagree | [x]   |

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| Comments:In terms of the Welsh language, we believe that there is an opportunity to include some examples of how local authorities have actively promoted access to education through the medium of Welsh through transport arrangements. For example, it may refer to:* Examples of where local authorities provide discretionary transport to Welsh-medium post-16 provision
* Examples of local authorities reducing free transport distance thresholds for Welsh-medium education, to reflect the fact that attending Welsh-medium provision is often more difficult and costly than attending English-medium provision
* Examples where local authorities work together to ensure pupils receive free transport to schools in neighbouring local authorities
* Examples where local authorities make transport arrangements to Welsh-medium schools and charge a concessionary fee for that
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**Question 6** – Do you agree that the inclusion of a general guide on maximum journey times will help increase consistency across local authorities?

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| Agree | [ ]  | Disagree | [ ]   | Neither agree nor disagree | [ ]   |

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| Comments: |

**Question 7** – 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?

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| Agree | [ ]  | Disagree | [ ]   | Neither agree nor disagree | [x]   |

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| Comments:The revised guidance better incorporates the general principles of the United Nations Convention on the Rights of the Child. However, neither the Learner Travel (Wales) Measure 2008 or the guidance ensures full fairness for those children and families who wish to attend Welsh-medium education. For the majority of the population of Wales, attending Welsh-medium education remains a more difficult and costly choice compared to English-medium education. As we outline in our response to question 13, although the revised guidance is a significant improvement they do not make up for the fact that transport arrangements still often means that Welsh-medium education remains a more difficult and less accessible choice for many parents and families across Wales. |

**Question 8** – Do you have any further comments you wish to make about part 1 of the guidance (Operational guidance)?

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| Comments:Paragraph 35 of the guidance refers to some factors that local authorities should consider when assessing learners' travel needs. We welcome the fact that the provision of Welsh-medium schools in the area is one of these factors. We believe, however, that specific reference should be made to the geography of Welsh-medium provision, particularly in relation to Welsh-medium post-16 provision. That is, it is possible that in many areas of Wales there is much less Welsh-medium provision, and therefore, on average, attending Welsh-medium provision is much more difficult. Local authorities should be encouraged to ensure transport arrangements that offer equal opportunities for learners to choose and attend Welsh-medium provision. |

**Question 9** – Do you have any further comments you wish to make about part 2 (Assessment of 'available route' to school)?

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| Comments: |

**Question 10** – Do you have any further comments you wish to make about part 3 (Learner Travel Information (Wales) Regulations 2009)?

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| Comments: |

**Question 11** – Do you have any further comments you wish to make about part 4 (Safety on learner transport)?

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| Comments: |

**Question 12** – Do you agree that the update to the guidance is clear and easy to understand?

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| Agree | [ ]  | Disagree | [ ]   | Neither agree nor disagree | [ ]   |

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| Comments: |

**Question 13** – 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?

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| Comments:We believe that the revised guidance is a significant improvement on the existing guidance and is likely to have a positive impact on people's chances of receiving Welsh-medium education.However, it is important to note that the influence of the guidance is limited given the more fundamental shortcomings of the Travel by Learners (Wales) Measure 2008 and the impact of budgetary constraints on the ability of local authorities to provide suitable and equitable transport for Welsh-medium education. Despite the revised guidance we are concerned that local authority transport arrangements will continue to mean that choosing Welsh-medium education is a harder and more costly choice for many families. We are also concerned that the Welsh Government's and local authorities' transport policy does not fully reflect and support the vision of the Welsh Language and Education (Wales) Act 2025. Amending the guidelines is not the real solution to solving these broader and more fundamental problems. Rather, the Welsh Government needs to develop and implement a new vision for transport to education, including ensuring an adequate budget to enable local authorities to act appropriately to facilitate access to Welsh-medium education.  |

**Question 14** – 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; eller
* mitigate any negative effects on using the Welsh language and on not treating the Welsh language less favourably than English?

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| Comments: |

**Question 15** – 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:

Comments:

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| Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: | [ ]  |