



# **Walked Routes to Schools Assessment Guidance**

**June 2026**

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### Version History

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1.0	25.06.2026	Public Transport Unit Manager	Initial document	Head of Operations and Environment

## 1.0 Introduction

1.1 Moray Council has a responsibility to ensure that suitable arrangements are in place for the provision of school transport. The Council's approved policy position as of September 2025 is as follows:

- The council will provide school transport at no cost to pupils attending their zoned school where
  - a) For primary school pupils the journey from home to school is greater than 2 miles
  - b) For high school pupils the journey from home to school is greater than 3 miles
  - c) For all pupils where there is no safe walking route from home to school
- Where transport is provided pupils may still be expected to walk up to 2 miles (primary) or 3 miles (secondary) to access school transport.
- The council is responsible for determining whether there is a safe walking route.
- The council is required to have regard to safety relating to school transport arrangements but there are no specific requirements or processes to be followed.
- Should a pupil have individual support needs or mobility restrictions that preclude walking an otherwise safe walking route (or accessing the routine school transport provision) then transport needs will be met separately through existing processes.
- It is parental responsibility to ensure safety of pupils on their journey to school or to/from the pick up point for school transport.
- Contracted / Council operated home to school transport routes may also be registered as public bus services.

1.2 This document outlines the Council's operational approach on determining available walk routes and the methodology adopted in carrying out assessments.

1.3 The approach applies to mainstream pupils throughout Moray and may apply to pupils with Additional Support Needs where transport has not been raised through the Child Planning Process and authorised through the ASN Resources Group.

## **2.0 References and Source Data**

- 2.1 The Scottish Government provides guidance in its [School Transport Guidance](#)
- 2.2 Road Safety GB & Royal Society for the Prevention of Accidents (RoSPA) jointly produced a guidance document in 2012, (updated in November 2025 ), – *Assessment of Walked Routes to School* – covering the methodology for assessing walking routes to school. The Guidelines can be purchased from Road Safety GB at <http://roadsafetygb.org.uk>.
- 2.3 Moray Council provides general information for parents relating to school transport. This is detailed at [School Transport - Moray Council](#) on the Council's website.

## **3.0 Operational Approach**

- 3.1 Moray Council uses the Road Safety GB guidelines as the benchmark for the assessment of walking routes to school, to ensure fairness in the provision of free transport on the grounds of road safety.
- 3.2 This document, along with the supporting procedures for assessing a route, ensures a transparent decision-making process to allow an objective outcome to be determined.
- 3.3 On a more general basis, to support and encourage active travel (walking, cycling and scooting) to school, the Council's Sustainable Transport Officer will support schools in preparing, managing and updating their School Travel Plans and in encouraging and promoting active travel behaviours. This work is captured in the Council's Active Travel Strategy.

## 4.0 Expectations

4.1 In support of the Council's aim to safeguard pupils who walk to school, there are a number of actions that are expected:

- All Moray schools are encouraged to work in partnership with stakeholders to produce a *School Travel Plan*. Travel Plans are reviewed from time to time and will be made available on school websites to promote a positive safety culture.
- Pupils who walk to school act responsibly themselves and are accompanied by a responsible adult, where appropriate.
- In the absence of intervening circumstances (such as substantial or significant changes in legislation, guidance or temporary/permanent infrastructure changes which may affect the availability of the route), existing assessments for routes that are not deemed to be available will be reviewed 5 yearly. New assessments are carried out as the need arises or upon notification or awareness of a material change to road or access layout.
- If there is any reasonable doubt on the part of the Council as to the availability of a route, the Council will provide transport.
- Road users are expected to behave reasonably and responsibly.
- Parents/carers may want to consider additional appropriate measures, for example, the use of fluorescent or light-coloured clothing etc.

## **5.0 Assessment of Walked Routes**

### **5.1 Assessing Officers**

- 5.1.1 Walking routes are assessed by a core team of Assessing Officers from within the Public Transport Unit (PTU) who will walk the route on a school day, in the hour before morning bell time and the hour after afternoon bell time, to observe and note the features of the route and to gather additional information as required. They use a walked route assessment form (Appendix B) to record their findings.
- 5.1.2 All walk route assessments are carried out by a minimum of 2 assessing officers, comprising professionals who have experience in reviewing and assessing walking routes to school. A collective decision on the availability of the route, based on the criteria, will be made by the assessing officers.
- 5.1.3 Where there are concerns noted by the assessing team, further input and guidance will be sought from a traffic engineer or other relevant professional before a final decision is taken.

### **5.2 New Assessments**

- 5.2.1 When a new request for a route assessment is received (this may come from a school, external body or individual in writing), this will be carried out, as soon as possible, subject to the availability of the assessing officers and arranging the timing of the assessment to be carried out within term time. Where a route has been assessed, there will be a 12-month time limit for any subsequent request for a reassessment, unless there is a significant change to the route or any other information of relevance is raised.
- 5.2.2 The walk route assessment form will be completed, with the findings shared with the person making the request within 28 days of the date of the assessment. Any appropriate actions will be taken forward by the Council.

### **5.3 Review of Assessments (for routes deemed not to be available)**

- 5.3.1 Only where there are significant interim changes will re-assessments be undertaken to maintain consistency and fairness. Where a review results in a change to the availability of a route, any suitable mitigations will be considered by the Council.

## 5.4 Criteria

5.4.1 The main criteria for determining the availability of a walked route are detailed in Appendix A.

5.4.2 In summary, for a route along or adjacent to a public road to be considered available, there normally needs to be:

- a continuous, adequate footway or roadside strip on roads which carry normal to heavy\* traffic, or
- step-offs, on roads which are lightly\* trafficked and which have adequate visibility to provide sufficient, advance warning or
- on roads with light\* traffic flow and no step-offs, adequate road width, visibility, observed traffic speed, volume and composition to provide sufficient, advance warning,

Attention is drawn to the Road Safety GB criteria which is noted below in italics.

and, if there is a need to cross roads, there must be (in order of hierarchy):

- Sufficient gaps in the traffic flow and adequate visibility to allow enough opportunities to cross safely, or
- Traffic calming (sufficient to enable safe road crossing), or
- Pedestrian refuges, or
- Crossing facilities (Zebra or Signalised pedestrian crossings), or
- Pedestrian phases at traffic signals (including pedestrian refuges).

The type of pedestrian crossing facility will correspond to the volume of traffic carried on the road as referenced below. For lighter traffic flows, gaps in traffic may be sufficient without formal facilities. As flows increase physical measures such as pedestrian refuges and formal crossings may be appropriate.

*\* traffic flow definitions are based on the RoSPA/Road Safety GB guidance mentioned in 2.3.*

- *Light flow is <240 vehicles per hour (if flow was evenly spaced across the whole hour, this would mean gaps between vehicles of at least 15 seconds)*
- *Low flow is 240-400 vehicles per hour (if flow was evenly spaced across the whole hour, this would mean gaps between vehicles of 9-15 seconds)*
- *Medium flow is 400-840 vehicles per hour (if flow was evenly spaced across the whole hour, this would mean gaps between vehicles of 4½-9 seconds)*
- *Heavy flow is >840 vehicles per hour (if flow was evenly spaced across the whole hour, this would mean gaps between vehicles of less than 4½ seconds)*

## **6.0 Reviewing an Assessment Decision**

6.1 There may be instances where the findings of an assessment are disputed by a parent/carer. The parent/carer may request a copy of the assessment which will then be issued to them. The issue of the assessment will be undertaken in the timescales appropriate to a front-line complaint, currently 5 days. The parent/carer should respond within 20 working days, setting out their concerns and objections to decision reached in the assessment.

6.2 Any representation received from the parent/carer will be reviewed by the Service Manager Transportation in conjunction with the members of the Public Transport Unit. The decision of Service Manager Transportation will be the final outcome of the process unless they have a material concern on the original decision, in which case the Head of Service will be consulted to agree an outcome. A final decision involving all parties referred to should be issued within 20 working days.

## APPENDIX A

### Criteria for Use During a Walked Route Assessment

The following criteria will be taken into account, recorded or measured by assessors to ensure consistency in all assessments. It is, however, recognised that, in reaching a decision about a walk route, assessors should not necessarily consider each criterion in isolation but should consider its interaction with all others to determine walk route availability at particular locations.

#### 1 Accompanied Children

The assessment assumes that a child walking a route will be accompanied by a responsible adult, where appropriate. This is on the basis that the Council's statutory duty to ensure pupils get to school covers:

- those who live over the entitlement distance from their catchment school
- those who have an unavailable walk route.

Beyond this, it is a parent/carer's responsibility to ensure attendance at school, by virtue of Section 30(1) of the Education (Scotland) Act 1980:

*"It shall be the duty of the parent of every child of school age to provide efficient education for him suitable to his age, ability and aptitude either by causing him to attend a public school regularly or by other means."*

The above is consistent with local authority procedures across the UK and is backed by case law – most notably two House of Lords decisions (Rogers & another v Essex County Council 1986 and Regina v Devon County Council 1988), in which the former states,

*"A route to be 'available'...must be a route along which a child accompanied as necessary can walk and walk with reasonable safety to school. It does not fail to qualify as 'available' because of dangers which would arise if the child is unaccompanied."*

#### 2 Footways and roadside strips

For all sections of road where there is a footway or roadside strip of 1 metre in width, capable of being walked along, the route is considered to be available for that part of the journey. Verges and other unsurfaced strips at the side of a road will only be considered available if they can be walked without hindrance from vegetation, watercourses or other obstacles and are free from undulations.

Where a footway or roadside strip exists, but is less than 1 metre in width, assessing officers will consider the interaction of site-specific factors, including the following, to determine availability:

- length of footway less than 1m width
- ability to step off onto an adjacent verge
- any necessity to step off onto the road itself
- traffic flow and speed limit
- sightlines/visibility
- surface makeup and condition
- additional footway obstructions
- accident data.

Where there is no suitable footway or roadside strip on roads where the two-way traffic flow (one way of a dual carriageway) is less than 240 vehicles per hour, the route may still be considered available if:

- there are verges which provide a “step off” for pedestrians walking towards traffic when vehicles are passing, or,
- the width of the carriageway, observed speed, volume, composition of traffic and visibility deem the route as available.

### **3 Crossing Points**

In all cases, it is assumed that pupils and, when present, the accompanying adult will, at some point, have to cross a road to make use of footways, roadside strips or verges and that they will observe the Highway Code at all times.

Where it is necessary to cross a road, the following circumstances will be considered:

- Assessing officers will make a note of where there is a need to cross a road, where it is appropriate to cross and the visibility at that point.
- All marked pedestrian crossings, zebra crossings, pedestrian refuges, signal controlled junctions (with a pedestrian phase) will be considered available.
- A crossing point will also be considered available where the two-way (or one way of a dual carriageway) traffic flow is fewer than 240 vehicles per hour and there is sufficient visibility.
- At locations with no crossing facilities and where the two-way traffic flow (or one way of a dual carriageway) is greater than 240 vehicles per hour, the crossing point will be assessed to ensure there is sufficient visibility. This assessment may include the application of traffic counters at the crossing point and a subsequent gap analysis for the hour before morning school bell and after afternoon school bell time (though, if the crossing point is distant from the school, the hour will be adjusted to reflect realistic walking times). In general, if there are sufficient gaps in every 5 minute period then the road is assessed as available to cross.

- Where a crossing point is required on an exit road from a roundabout, assessors will observe and record any potential uncertainties, caused by vehicle movements on the roundabout itself, which could cloud the decision to cross at the crossing point.

#### **4 Other routes**

An available route may include roads, public paths, rights of way, footpaths and other active travel routes, which provide a suitable walking surface, passable without hindrance from surrounding vegetation or other obstacles.

For off-road routes, which include parks, wooded areas, grassland and public spaces, assessing officers will consider the interaction of site-specific factors including:

- surface
- lighting
- visibility/sightlines
- surrounding walls, vegetation or other barriers
- advice from traffic engineers

Routes through cemeteries, graveyards, crematoria and places of worship will not be considered available for the purposes of route assessment.

Assessments may include information on an alternative walking route to the available one or other means of transport. Parents/carers/pupils may also identify alternative routes of their own or alternative means of accessing school. Such alternative routes may not be the most direct or the fastest route. Where an alternative route is longer than the distance entitlement criteria this would not lead to free transport entitlement given the existence of the originally assessed available route.

#### **5 Gradient**

The presence or absence of a gradient is part of the overall assessment of the availability of a route.

#### **6 Street lighting**

The presence or absence of street lighting is part of the overall assessment of the availability of a route. However the absence of street lighting does not in itself, render a route unavailable.

## **7 Assessment of accident data**

The assessors will note accidents over the previous three to five years – using data provided by Police Scotland – as part of the assessment. The existence of collisions does not necessarily indicate that the route is unsafe for the journey to school, the type of collisions recorded and the factors that led to them will help to establish if there are trends in the collisions or any known factors that might recur such that mitigations can be considered to reduce the likelihood of collisions taking place. It should be noted that collision trends on the road network are investigated so that improvements to the road network can be identified to reduce collisions, and that this process takes place independently of a walked routes to schools assessment.

## **8 Weather conditions**

Weather is not considered in the assessment of walk route availability. However, the *impact* of weather on a route's availability may be taken into account e.g. regular flooding making a route impassable.

## **9 Pollution**

Moray consistently sits amongst the counties with the lowest air pollution ratings in Scotland and as such, it's believed that air pollution is unlikely to be factor in assessing available home to school transport routes. Should air quality or pollution become a notable concern in Moray, this aspect of the guidelines will be revisited.

It's accepted that episodes of other forms of pollution, for example an oil spillage, whilst unlikely, could impact on specific home to school transport routes. Individual cases such as these would be assessed case by case and solutions sought, temporary or otherwise.

## **10 Crime**

Police Scotland considers a *Community Impact Assessment (CIA)* for every serious crime, and this takes into account ongoing issues for an area. If a specific threat is identified - as part of a CIA - that concludes that pupils in an area may be at risk, Police Scotland would consider and implement various protective and preventative measures including liaison with Moray Council if this was deemed to be necessary.

Registered sex offenders (RSOs) are managed by Police Scotland's Offender Management Unit and their placement in a community involves a risk assessment of the individual and the neighbourhood in which they live. This includes proximity to schools and other establishments which could be at an increased risk, depending on the individual's history. The Offender Management Unit manages the RSOs, on an ongoing basis in the community.

## **11 Trunk Roads**

Where a walk route is along or crosses (at surface) a trunk road, the assessors will consult as required with Transport Scotland with any concerns or design issues to be resolved.

## APPENDIX B

### WALKED ROUTE ASSESSMENT FORM

To be completed in full by officers undertaking assessment in conjunction with.

#### School/Educational Establishment & Route details

School or alternative educational establishment.	Route – write a brief description only (start/end point and key roads). <i>Attach map at end of document</i>
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#### Assessment Details

Date	Time
Weather Conditions	Key Observations

#### Assessors

Name	Designation	Contact Details

**1. Is there a continuous adequate footway?**

Footpath suitability /  
condition / length

If length of footway is less  
than 1m width (as in a  
pinch point on the route)

Consider the combination of site-specific factors including the following to determine availability:

- length of footway less than 1m width
- ability to step off onto an adjacent verge
- any necessity to step off onto the road itself
- traffic flow and speed limit
- sightlines/visibility
- additional footway obstructions
- accident data.

Requirement/need to  
cross a road

Where it is appropriate to  
cross this road

Visibility at the point of  
crossings

**CONCLUSION: continuous adequate footway?**

Yes  No

*If yes, at this stage the route is deemed to be a non-hazardous walking route, please go to question 4. If no, please go to question 2.*

**2. In the absence of a continuous adequate footway, are there step offs with adequate sight lines?**

Suitability and nature of  
step offs

Visibility

**CONCLUSION: step offs with adequate sight lines?**

Yes  No

*If yes, at this stage the route is deemed to be a non-hazardous walking route, please go to question 4. If no, please go to question 3.*

**3. If there are no step offs, are there adequate sight lines?**

Provide details

**CONCLUSION: are there adequate sight lines?**

Yes  No

*If yes, at this stage the route is deemed to be a non-hazardous walking route, please go to question 4. If no, the route is an unsafe walking route, please go to question 5.*

**4. Are there any other considerations that will impact on the assessment outcome?**

Visibility / sight lines for pedestrians\*

Traffic flow (observed) \*

Is there a need for a formal traffic count/gap analysis too?

List all crossings, islands & speed limits

Paths/ Wooded Areas/ Vegetation/ flooding (frequency over a year)

Consider the combination of site-specific factors including:

- surface
- lighting
- visibility/sightlines
- surrounding walls, vegetation or other barriers
- advice from other teams

Availability of public transport

Exceptional features e.g. type of vehicles on route

Transport Scotland Input (if appropriate) for routes along A95 and A96.

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Collision Data (damage only, slight, serious & fatal covering the last 3 years)

**CONCLUSION: Are there any other considerations that will impact on the assessment outcome?**

Yes  No

*\*Where the traffic flow / sight line is considered, a record of any vehicle count / speed survey should be retained. Only relevant where a road is crossed without available traffic interrupters.*

5. **CONCLUSION: is the route available?**

Yes  No

**WALKED ROUTE ASSESSMENT FORM  
SUPPLEMENTARY INFORMATION**

*Insert map, photographs here as available*