

## EQUALITY IMPACT ASSESSMENT - TRAFFORD COUNCIL

<b>A. Summary Details</b>		
1	Title of EIA:	All Age Travel Assistance This EIA has been updated since the public consultation November 2015 to February 2016 and the supplementary early years' consultation in April 2016. This resulted in a number of changes to the new policy.
2	Person responsible for the assessment:	Sarah Russ – Trafford Travel Co-ordination Unit
3	Contact details:	<a href="mailto:Sarah.russ@trafford.gov.uk">Sarah.russ@trafford.gov.uk</a>
4	Section & Directorate:	Trafford Travel Co-ordination Unit, CFW
5	Name and roles of other officers involved in the EIA, if applicable:	Alison Milne, Head of Service Access and Inclusion Marilyn Golding, Admissions Manager Chris Warner, Head of Service, Provider Services

<b>B. Policy or Function</b>		
1	Is this EIA for a policy or function?	Policy <input checked="" type="checkbox"/> Function <input type="checkbox"/>
2	Is this EIA for a new or existing policy or function?	New <input type="checkbox"/> Existing <input type="checkbox"/> Change to an existing policy or function <input checked="" type="checkbox"/>
3	What is the main purpose of the policy/function?	The All Age Travel Assistance Policy replaces the previous Home to School Transport Policy. The new policy covers:-

		<ul style="list-style-type: none"> <li>● Children and young people of pre-school age (2-4 years);</li> <li>● Children under compulsory school age starting reception;</li> <li>● Children of compulsory school age (aged between 5 and 16 years) with their travel from home to school or place of learning;</li> <li>● Disabled children 0 -18 accessing social care or similar;</li> <li>● Persons of sixth form age (aged between 16 to 18 and those continuing learners who started their programme of learning before their 19<sup>th</sup> birthday) to aid their attendance at school, college or place of learning;</li> <li>● Adult learners;</li> <li>● Adults with care and support needs..</li> </ul>
4	Is the policy/function associated with any other policies of the Authority?	<ul style="list-style-type: none"> <li>● School admissions policy</li> <li>● Health and Safety policy</li> <li>● Safeguarding children policy</li> <li>● Corporate Complaints policy</li> <li>● Moving &amp; Handling policy</li> <li>● Adults Safeguarding policy</li> </ul>
5	Do any written procedures exist to enable delivery of this policy/function?	<ul style="list-style-type: none"> <li>● Attendance management procedures for the management of passenger assistant staff;</li> <li>● Code of conduct procedures for all staff;</li> <li>● Contract procedure rules which govern the Council's procurement of goods and services;</li> <li>● Appeals procedure for managing travel assistance appeals;</li> <li>● Assessment process regarding child in need assessments;</li> </ul>

		<ul style="list-style-type: none"> <li>● Assessment process regarding adult's needs assessments;</li> <li>● Complaints procedure for managing complaints in relation to travel assistance.</li> </ul>
6	Are there elements of common practice not clearly defined within the written procedures? If yes, please state.	<ul style="list-style-type: none"> <li>● Behaviour management for assisting with the management of difficult behaviours whilst children and adults are on commissioned transport;</li> <li>● Route planning for ensuring the most cost effective journeys;</li> <li>● Council approach for charging for services;</li> <li>● Adult services currently operate an adult resource panel for sign off of all adult transport applications.</li> </ul>
7	Who are the main stakeholders of the policy? How are they expected to benefit?	<p><b>Stakeholders</b></p> <ul style="list-style-type: none"> <li>● Children and young people of pre-school age 2 to 4 years;</li> <li>● Children under compulsory school age starting reception;</li> <li>● Children of compulsory school age</li> <li>● Young people with Special Educational Needs and Disability (SEND) aged 16 to 19 years</li> <li>● Young people aged 16 to 19 years without and Education, Health and Care Plan in mainstream provision and in financial hardship;</li> <li>● Adult learners;</li> <li>● Adults accessing social care;</li> <li>● Parents/Carers;</li> <li>● Heads and Governing Bodies;</li> <li>● School staff;</li> <li>● Adult social care providers;</li> <li>● Educational placement providers for adults;</li> <li>● Passenger Assistants;</li> <li>● Bus/taxi contractors;</li> </ul>

		<ul style="list-style-type: none"> <li>• Elected members</li> </ul> <p><b>Benefits</b></p> <ul style="list-style-type: none"> <li>• Easy to read policy with clear and transparent eligibility and suitability criteria and appeals process;</li> <li>• Enables accessibility to educational establishments so that children, young people and adults can participate in education and learning;</li> <li>• Supports sustainable travel;</li> <li>• Supports and promotes independence;</li> <li>• Offers a range of travel assistance solutions to support choice and flexibility for families;</li> <li>• Supports local economy by employing local people as Passenger Assistants and by commissioning local taxi/bus companies;</li> <li>• Affordable for those in hardship (a hardship scheme is available for those receiving a chargeable service).</li> </ul>
8	How will the policy/function (or change/improvement), be implemented?	<p>The All Age Travel Assistance Policy will be implemented from the 1<sup>st</sup> June 2016. The arrangements for home to educational establishment transport provision and assistance as set out in the Policy will apply from 1<sup>st</sup> September 2016.</p> <p>Eligibility of current pupils to be reviewed in May 2016. People not eligible under new policy will be informed that they will no longer receive travel assistance and given a minimum of 2 months' notice to allow them to make alternative arrangements and/or re-apply including go through the appeals process.</p>
9	What factors could contribute or detract	<ul style="list-style-type: none"> <li>• Political support, or lack of;</li> </ul>

	<p>from achieving these outcomes for service users?</p>	<ul style="list-style-type: none"> <li>• Legal challenge;</li> <li>• Ability of families to pay the proposed charges, even those eligible for hardship;</li> <li>• Capacity and resources to implement a charging system;</li> <li>• Capacity and resources to manage income recovery for non payers;</li> <li>• Capacity and resources to manage an increase in applications if the demand rises;</li> <li>• Capacity and resources to provide passenger assistants if the demand increases;</li> <li>• Capacity to provide enough vehicles if demand increases;</li> <li>• Capacity and resources to manage the appeals process.</li> </ul>
10	<p>Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, please state?</p>	<p>Children, Families and Wellbeing Service:-</p> <ul style="list-style-type: none"> <li>• Trafford Travel Co-ordination Unit – responsible for administering the All Age Travel Assistance Policy with the exception of those responsibilities detailed below;</li> <li>• School Admissions – responsible for administering bus passes for children of compulsory school age;</li> <li>• Education, Health and Care Panel – responsible for recommending school and nursery assessment places for children with special educational needs and disabilities;</li> <li>• Children with Complex and Additional Needs Service – responsible for undertaking child in need assessments;</li> <li>• Community Nursing Team – responsible for medical training of Passenger Assistants who support children with complex needs;</li> <li>• Adults Social Care – responsible for undertaking adult’s needs</li> </ul>

assessments including the need for travel assistance.

### C. Data Collection

1	What monitoring data do you have on the number of people (from different equality groups) who are using or are potentially impacted upon by your policy/ function?	<p>School census data (Appendix A) compiled May 2015 and October which contains</p> <ul style="list-style-type: none"><li>● the total pupil headcount</li><li>● headcount by gender</li><li>● headcount by ethnicity</li><li>● headcount by school of pupils in receipt of Free School Meals (FSM)</li></ul> <p>413 children and young people currently accessing travel assistance – all of whom have SEND. 130 (31.47%) are female and 283 (68.52%) are male.</p> <p>43 adult learners/social care service users being transported door to door.</p> <p>Appendix B – Travel Assistance Analysis details that in the autumn term 2015 288 children and young people received bus passes to travel to school, of these:-</p> <p>138 passes were issued to pupils from low income families</p> <p>99 passes were issued to pupils based upon the distance from home to school</p> <p>51 passes were issued to pupils attending a grammar school that is not their nearest grammar school as they are not eligible to attend their nearest grammar school (i.e did not pass that school’s entrance exam).</p>
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Appendix C- Travel Assistance Analysis for adult services complied for 2015/16 contains the following:

- Number of adult using the transport provision
- Number by gender
- Number by age
- Number by ethnicity
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On -going data will continue to be collated. In addition the adult resource panel will from the 1<sup>st</sup> April 2016 start to collate the following:

- Number of applications put forward
- Number of application accepted
- Number of applications rejected
- Reasons for rejections

The table below gives a snapshot of transport provision by gender as at 6th May 2016

<b>Where</b>	<b>Male % on transport</b>	<b>Female % on transport</b>
OVERALL	69	31
Egerton	93	7
LPS	86	14

		Delamere	64	36
		Pictor	71	29
		Manor	70	30
		Brentwood	62	38
2	Please specify monitoring information you have available and attach relevant information*	School census data which includes headcount by age, gender, ethnicity, free school meals.  Adult transport analysis data which includes headcount by age, gender, ethnicity.		
3	If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data?	It is intended to collect equality data for travel assistance applications and eligible people		

*\*Your monitoring information should be compared to the current available census data to see whether a proportionate number of people are taking up your service*

<b>D. Consultation &amp; Involvement</b>		
1	Are you using information from any previous consultations and/or local/national consultations, research or practical guidance that will assist you in completing this EIA?	Reviewed consultation documentation for the policy review that took place in 2011.  Review of recent Council budget consultations carried out by an independent organisation at every stage of the process.  Review of the All Age Policy feedback given as part of the public consultation that ran from 30 <sup>th</sup> November to 2 <sup>nd</sup> February 2016.



A public consultation enabling the public to give feedback on the proposed new policy ran from 30<sup>th</sup> November 2015 until 2<sup>nd</sup> February 2016.

The feedback was captured, analysed and reported on by an external company. The consultation consisted of the following methods:-

- Electronically via the web whereby the public could complete an online survey
- Hard copies of a survey were made available for completion
- Face to face consultation sessions took place in schools and other venues
- Written feedback submitted from the public in letters and emails were also included in the consultation.
- In some cases minutes taken at face to face consultation meetings were also included in the consultation.

As a result of feedback from the public consultation a supplementary consultation on travel assistance for pre-school children age 2 to 4 years was undertaken from 11<sup>th</sup> – 29<sup>th</sup> April 2016. Fifty-five responses were received. All feedback has been captured electronically via the Council's website and has been incorporated into this EIA.

It was recognised that there was a potential language barrier for those parents where English is not the first language. Parents/Carers Forum commissioned to undertake consultation with specific groups of parents as part of the public consultation.

		Parents who are disabled may struggle to access information/attend consultation events and so accessible venues were used and information available was available on-line. Sign language interpreters were used at the public consultation events.
2	Please list any consultations planned, methods used and groups you plan to target. (If applicable)	
3	**What barriers, if any, exist to effective consultation with these groups and how will you overcome them?	

*\*\*It is important to consider all available information that could help determine whether the policy/ function could have any potential adverse impact. Please attach examples of available research and consultation reports*

**E: The Impact – Identify the potential impact of the policy/function on different equality target groups**

*The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any of the target groups you will also need to assess whether that negative potential impact is high, medium or low*

	<b>Positive</b>	<b>Negative (please specify if High, Medium or Low)</b>	<b>Neutral</b>	<b>Reason</b>
<b>Gender – both men and women, and transgender;</b>	√			Over representation of boys with SEND. School pupil population gender split is 51.13% boys and 48.87% girls.

		L		<p>Current transport data reveals that 69% of passengers are male and 31% of passengers are female @ 6<sup>th</sup> May 2016.</p> <p>Adults' data confirms an over representation of males 53% male and 47% female</p> <p>TTCU provides transport to whoever is eligible whether they are male or female bears no relation to eligibility.</p> <p>The introduction of charging may have a low negative affect on males as more males are deemed eligible and receive travel assistance than females. This may only affect those male pre-school aged children, students aged 16-18 and adults with an assessed social care need.</p>
Pregnant women & women on maternity leave			√	
Gender Reassignment			√	

Marriage & Civil Partnership			√	
<b>Race-</b> include race, nationality & ethnicity (NB: the experiences may be different for different groups)		L		English as a second language presents barriers to accessing and understanding services in children's & adult services. Families may not realise that their child, young person or adult family member could be eligible for travel assistance.
<b>Disability</b> – physical, sensory & mental impairments	√			<p>The majority of children, young people and adults accessing door to door commissioned transport assistance have SEND. This Policy supports this group of people to access education, learning and social care activities to meet their assessed needs.</p> <p>The Policy sets out a range of travel assistance solutions and is aimed at promoting independence and providing life skills, these include Independent Travel Training and Passenger</p>

		L	<p>Assistants accompanying people on public transport.</p> <p>Pre-school age children age 2 to 4 years who have an EHCP or are undergoing an Assessment and are at a Trafford special school will be able to apply for travel assistance.</p> <p>As a result of the feedback received from the consultation exercise a decision has been made not to introduce pick up points.</p> <p>The proposed charges have been significantly reduced and account has been taken of the impact of charges on low income families and adults.</p>
<b>Age Group</b> - specify eg; older, younger etc)		L	<p>The new policy has a charging element for pre-school children age 2 to 4 years, young people in sixth form aged between 16 to 19 years and adults requiring travel assistance as a result of</p>

				<p>their assessment.</p> <p>The number affected by the charge is low compared to the total number of people receiving travel assistance.</p> <p>Students aged 16-19 years in mainstream provision without an Education, Health and Care Plan can apply for travel assistance on the basis of financial hardship.</p> <p>Adult learners, children of compulsory school age and children in need aged 0 to 18 years will receive free travel assistance if deemed eligible.</p> <p>Feedback from the Early Years consultation is strongly against charging for the 2-4 year olds. (80% of respondents were against charging for this age group)</p>
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				The proposed charges have been significantly reduced and account has been taken of the impact of charges on low income families and adults as a result of the consultation feedback. Many other local authorities have similar levels of charges for travel assistance.
<b>Sexual Orientation –</b> Heterosexual, Lesbian, Gay Men, Bisexual people			√	
<b>Religious/Faith groups</b> (specify)	√		L	<p>The Council continues to support primary age pupils from low income families to attend a denominational school. Eligibility mirrors that of the Council's statutory duties for secondary age pupils from low income families.</p> <p>Although Trafford is well served by a mixture of Church of England and Catholic schools some other religious/faith groups may be disadvantaged by the lack of in Borough provision.</p>

				Parents who choose a denominational school based on religious beliefs will be ineligible for travel assistance unless the school is their child's nearest qualifying school.
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**As a result of completing the above what is the potential negative impact of your policy?**

High                       Medium                       Low

**F. Could you minimise or remove any negative potential impact? If yes, explain how.**

<p>Race:</p>	<p>Information about services for children, young people and adults is held on Trafford's Service Directory with specific information for children and young people with SEND on the local offer pages.</p> <p>Translation services are available on request.</p> <p>The use of electronic application forms may assist applicants as they may be able to seek the help of other family members or community workers.</p> <p>The TTCU and other services are also available for telephone or 121 support. Sometimes people may not be able to read English but are sufficiently proficient to be able to speak to someone for advice and support.</p>
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Gender:	The removal of all charges for all groups. However this may have a negative impact elsewhere as the Council is committed to allocating resources to people most in need. The proposed charges have been significantly reduced and account has been taken of the impact of charges low income families and adults.
Disability:	As a result of the public consultation feedback the policy has been amended so that where charges are applicable service users will be charged at a lower rate than previously suggested. It has also been agreed that pick up points are no longer going to be implemented.
Age:	For those age groups who will incur a charge there will be a low income or hardship element. Those eligible under low income or hardship will be charged 50%.  Independent travel training can be provided to young people and adults but not to younger children.
Sexual orientation	N/A
Religious/faith groups:	Only a change to the existing and proposed Policy in order to provide travel assistance to persons in this group would minimise or remove this potential impact. However this may have a negative impact elsewhere as the Council is committed to allocating resources to people most in need.
Also consider the following:	
1	If there is an adverse impact, can it be justified on the grounds of promoting equality of opportunity for a particular equality group or for another legitimate reason?
	All Age Travel Assistance Policy will discharge Trafford's statutory duties; it is proposed that the Council uses its discretionary powers to provide travel assistance to groups of children, young people and adults who are not eligible under

		the existing policy or statute.
2	Could the policy have an adverse impact on relations between different groups?	No
3	If there is no evidence that the policy <i>promotes</i> equal opportunity, could it be adapted so that it does? If yes, how?	The Policy does promote equality of opportunity.

### G. EIA Action Plan

<b>Recommendation</b>	<b>Key activity</b>	<b>When</b>	<b>Officer Responsible</b>	<b>Links to other Plans eg; Sustainable Community Strategy, Corporate Plan, Business Plan,</b>	<b>Progress milestones</b>	<b>Progress</b>
Ensure accessible consultation	Public consultation with key stakeholders on proposed changes	Nov 2015 to Jan 2016	Elaina Quesada/ Alison Milne	Re-shaping Trafford		Complete
Creation of a travel assistance working party	Ensure appeals process and grounds for appeal, equitable and transparent	December 2015	Alison Milne	Implementation of SEND Review Re-shaping Trafford Trafford SEND Policy		Complete
Gather equality and diversity monitoring data	Amend SEND TTCU application forms to collect	Sept 2016	Sarah Russ	Trafford Equality Objectives Service Delivery Policy		In progress

	data. Bus pass applications to be recorded on Admissions and Transfers System to cross match data	May 2016	Marilyn Golding	Statement		
Review impact of new AATA Policy	Review Policy	October 2016	Alison Milne			
Review the impact of charging	Policy/process review	October 2016	Sarah Russ			

Please ensure that all actions identified are included in the attached action plan and in your service plan.



Signed  
Lead Officer  
Date

*Sarah Russ*  
Sarah Russ:  
6<sup>th</sup> May 2016

Signed  
Service Head Alison Milne Head of Service: Access and Inclusion  
Date 9<sup>th</sup> May 2016