

## EQUALITY IMPACT ASSESSMENT - TRAFFORD COUNCIL

A. Summary Details		
1	Title of EIA:	Home to School Transport within All Age Travel Assistance Policy 2021
2	Person responsible for the assessment:	Sarah Russ
3	Contact details:	<a href="mailto:sarah.russ@trafford.gov.uk">sarah.russ@trafford.gov.uk</a>
4	Section & Directorate:	Trafford Travel Coordination Unit (TTCU) Service Manager, Children's Services
5	Name and roles of other officers involved in the EIA, if applicable:	Sarah Butters, Head of Service: Early Years, School Places and Access Marilyn Golding, School Admissions Manager

B. Policy or Function		
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?	It is intended to amend the previous All Age Travel Assistance Policy which provides travel assistance to the following groups: - <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>● Young people of sixth form age to aid their attendance at education or</li> </ul>

		<p>training (aged between 16 to 19 or up to 25 with an education, health and care plan and who started their programme of learning before their 19<sup>th</sup> birthday</p> <ul style="list-style-type: none"> <li>• Adult learners;</li> <li>• Adults with care and support needs.</li> </ul> <p>There is one proposed policy change for 2021/22 which is to remove the discretionary criterion for grammar school pupils meaning that those who travel further than the nearest qualifying school will no longer be eligible for travel assistance. This means that families who travel further than the nearest school for a grammar school place will have to pay for any travel costs themselves, unless they are a low income family.</p> <p>The current discretionary allowance does not offer the same financial protection for other families, in similar circumstances, where their children have not qualified to attend a grammar school. Other families who choose to travel further than the nearest school for a place in a particular high school do not qualify for travel assistance unless they are a low income family.</p> <p>This proposal does not change things for low income families who meet the criteria to receive a free school meal and who choose to travel further to access either a grammar school place or a high school place. These low income families will continue to receive travel assistance. The guidance defines a low income family as where the child is eligible for a free school meal or the parent/carer is in receipt of the maximum amount of working tax credit.</p>
4	Is the policy/function associated with any other policies of the Authority?	<ul style="list-style-type: none"> <li>• School Admission arrangements</li> <li>• Health and Safety policy</li> <li>• Safeguarding Children policy</li> <li>• Corporate Complaints policy</li> <li>• Adult Social Care 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.</li> </ul>

		<ul style="list-style-type: none"> <li>• Appeals procedure for managing travel assistance appeals</li> <li>• Complaints procedure for managing complaints in relation to travel assistance.</li> <li>• Process to agree funded support for adults with care and support needs &amp; children / young people with complex needs.</li> <li>• Emergency Care Pathway to be followed by Passenger Assistants in the case of a medical emergency whilst transporting children, young people and adults.</li> <li>• Epilepsy Care Plan to be followed by Passenger Assistant for those children, young people and adults known to have epilepsy travelling on transport.</li> <li>• Epilepsy Care Pathway to be followed by Passenger Assistants in the case of a medical emergency whilst transporting those children, young people and adults known to have epilepsy.</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 on transport</li> <li>• Route planning for ensuring the most cost effective journeys</li> <li>• Council approach for charging for services</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> </ul>

		<ul style="list-style-type: none"> <li>● Bus/taxi contractors;</li> <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>● Clear pathways of support to be followed in the case of a medical emergency;</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?	Following a public consultation, the new policy will be effective from 1 June 2021 for travel arrangements in the academic year starting in September 2021.
9	What factors could contribute or detract from achieving these outcomes for service users?	<ul style="list-style-type: none"> <li>● Political support, or lack of;</li> <li>● Legal challenge;</li> <li>● Ability of families with nursery age children to pay the charges, even those eligible for hardship;</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, particularly larger vehicles and wheelchair accessible vehicles which are in short supply.</li> </ul>

		In relation specifically to the removal of the discretionary criterion for grammar school pupils, it is proposed the 124 families that currently benefit from travel assistance will be invited to provide evidence of particular hardship for further consideration.
10	Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, please state?	<ul style="list-style-type: none"> <li>• Trafford Travel Co-ordination Unit (TTCU) – 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 places for children and young people with special educational needs and disabilities;</li> <li>• Early Years SEND Panel – responsible for allocating nursery assessment places for young children with special educational needs and disabilities;</li> <li>• Children with Complex Needs Service – responsible for undertaking child in need assessments;</li> <li>• Epilepsy Care Plan – agreed between Epilepsy Nurse Specialist, parents and school and provided to the TTCU.</li> <li>• Assistants who support children with complex needs;</li> <li>• Adults Social Care – responsible for undertaking assessments under the Care Act 2014 to determine if an adult has eligible needs;</li> <li>• Social Care funding panel members and others managers with delegated funding decision making as described in the process to agree funded support for adults with care and support needs; children and young people with complex needs.</li> <li>• Trafford Carers Centre who undertake carers assessments on behalf of Trafford Council.</li> </ul>

### C. Data Collection

1	What monitoring data do you have on the number of people (from different equality	<u>Annual School Census Data</u>
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groups) who are using or are potentially impacted upon by your policy/ function?

- the total pupil headcount
- headcount by gender
- headcount by ethnicity
- headcount by school of pupils in receipt of FSM

**Trafford Travel Co-ordination Unit Data**

597 children and young people currently accessing travel assistance – all of who have SEND. 429 (72%) are male and 168 (28%) are female.

63 adult learners/social care service users being transported door to door. 32 (52%) are male and 30 (48%) are female.

**School Admissions Bus Pass Data**

Travel assistance analysis details that in the autumn term 2020, 249 children and young people received bus passes to travel to school, of these:

- 115 passes were issued to pupils from low income families. These children would not be affected by the proposed change.
- 10 passes were issued to pupils based upon the distance from home to school. These children would not be affected by the proposed change.
- 124 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. It is likely these children will lose their travel assistance under the proposed change.

An analysis of the home post codes of the 124 children who will be impacted was carried out against the Income Deprivation Affecting Children Index (IDACI) which indicates the proportion of children in an area age under 16 living in income deprived families.

		IDACI Decile	No. Pupils	%
		100% (10% least disadvantaged in England)	56	45%
		90%	15	12%
		80%	20	16%
		70%	6	5%
		60%	6	5%
		50%	5	4%
		40%	3	2%
		30% most disadvantaged in England	0	0%
		20% most disadvantaged in England	7	6%
		10% most disadvantaged in England	6	5%
		<b>Total</b>	<b>124</b>	<b>100%</b>
		It is recognised that this index is only an indicator and so it is proposed the 124 children who will be impacted by this policy change will be invited to provide evidence of particular hardship for further consideration.		
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		
3	If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data?	Adult social care - When assessments / reassessments are undertaken we will consider if an adult with care and support needs requires council funded travel assistance to meet their assessed needs and outcomes (in accordance with the policy). We will include this information on all funding tracking sheets and look to develop a field in Liquid Logic to generate automated reporting.		

*\*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*

## D. Consultation & Involvement

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?	Yes - Review of previous Council consultations
2	Please list any consultations planned, methods used and groups you plan to target. (If applicable)	<p>Future consultations will be via:-</p> <ul style="list-style-type: none"> <li>• Trafford Council website and Trafford Directory website.</li> <li>• Social media including Twitter and Facebook for Trafford Council; Family Information Service; SEND Information, Advice and Support Service (SENDIASS); Trafford Parents Forum.</li> <li>• Schools e-bulletin and the early years e-bulletin.</li> <li>• Materials will be made available in different formats if requested.</li> <li>• Parents forum and SENDIASS requested to provide formal feedback.</li> <li>• Letters to be sent to parent/carers who receive travel assistance.</li> <li>• Contractors and local colleges to be notified and feedback requested.</li> <li>• Internal services such as Adult Social Care and Children's Complex Needs within the council to be notified.</li> </ul>
3	**What barriers, if any, exist to effective consultation with these groups and how will you overcome them?	Parents who are disabled may struggle to access information/attend consultation events. Ensure accessible information available online via the Council's website and SEND Local Offer on Trafford Directory, in addition to a range of other formats.

*\*\*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*

	Positive	Negative (please	Neutral	Reason
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		specify if High, Medium or Low)		
<b>Gender</b> – both men and women, and transgender;		L		Over representation of boys with SEND. School pupil population gender split is 51% boys and 49% girls whilst 72% of boys receive travel assistance as CYP with SEND. No known gender impact for adults with care and support needs.
Pregnant women & women on maternity leave			√	For an adult with care and supports needs access to council funded travel assistance will be determined by the assessing officer in consideration of all their individual circumstances, assessed needs and outcomes
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. For an adult with care and supports needs access to council funded travel assistance will be determined by the assessing officer in consideration of all their individual circumstances, assessed needs and outcomes
<b>Disability</b> – physical, sensory & mental impairments	√			Majority of children and young people accessing door to door travel assistance have SEND.  This Policy supports this group of people to

				<p>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 Assistants accompanying people on public transport.</p> <p>Pre-school age children age 2 to 4 years who have an Education, Health and Care plan or are undergoing an assessment and are at a Trafford special school will be able to apply for travel assistance.</p> <p>Pupils of 6<sup>th</sup> form age are able to apply for travel assistance.</p> <p>For an adult with care and supports needs access to council funded travel assistance will be determined by the assessing officer in consideration of all their individual circumstances, assessed needs and outcomes.</p> <p>The policy has a specific care pathway for the management of epilepsy.</p>
<b>Age Group</b> - specify eg; older, younger etc)			√	<p>It is not proposed to increase the level of charges for pre-school children age 2 to 4 years.</p> <p>The number affected by the charge is low compared to the total number of people receiving travel assistance.</p>

				<p>There are no charges for young people of sixth form age between 16 to 19 years or up to 25 with an EHC plan.</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>For an adult with care and supports needs access to council funded travel assistance will be determined by the assessing officer in consideration of all their individual circumstances, assessed needs and outcomes</p>
<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</p>

			<p>may be disadvantaged by the lack of in Borough provision. 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.</p> <p>For an adult with care and supports needs access to council funded travel assistance will be determined by the assessing officer in consideration of all their individual circumstances, assessed needs and outcomes.</p>
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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.**

Race:	<p>Information about services for children, young people and adults is held on the Trafford Directory with specific information for children and young people with SEND on the local offer pages. Translation services are available online and in other formats 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>TTCU and other services are also available for telephone or face to face 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>
Gender:	No - over representation of boys with SEND in Trafford reflects national trends.

Disability:	No - as one eligibility criterion for travel assistance is “Special educational needs, disability or mobility problems”
Age:	For nursery age children 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.
Economic disadvantage:	It is proposed the 124 children who will be impacted by this policy change will be invited to provide evidence of particular hardship for further consideration.
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?
2	Could the policy have an adverse impact on relations between different groups?
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?
	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.
	No
	The Policy does promote equality of opportunity.

### G. EIA Action Plan

Recommendation	Key activity	When	Officer Responsible	Links to other Plans eg; Sustainable Community Strategy, Corporate Plan, Business Plan,	Progress milestones	Progress

Ensure accessible consultation	Public consultation	November 2020	Sarah Butters/ Marilyn Golding	Corporate Plan		Complete
Create a consultation response document	Collate and review feedback	March 2020	Marilyn Golding	Corporate Plan Included in Executive Report		Complete

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

Signed: *Sarah Russ*

Lead Officer

Date: 1 February 2021

Signed: *Sarah Butters*

Head of Early Years, School Places & Access

Date: 1 February 2021