

Equality Impact Assessment [version 2.12]

Title: Home to School Travel Support Policies	
☑ Policy □ Strategy □ Function □ Service	□ New
Other [please state]	⊠ Already exists / review ⊠ Changing
Directorate: Children & Education	Lead Officer name: Gail Rogers
Service Area: Home to School Travel	Lead Officer role: Head of Children's
	Commissioning

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here Equality Impact Assessments (EqIA) (sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the <u>Equality and Inclusion Team</u> early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use <u>plain English</u>, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Bristol City Council has reviewed our existing policies for home to school travel support. We are doing this to make our existing offer clearer for Parents and Carers. As part of the review, we have identified some things we think need to change. We are asking for feedback on these proposals as part of a consultation.

The policies are:

1. Bristol City Council Home to School (5-16) Travel Support Policy

Department for Education (DfE) updated their statutory guidance in June 2023 in relation to 5-16 travel, so we are making sure our policy is still in line with current guidelines.

No changes have been made to eligibility for travel support. We are consulting on some new additions for pupils that we would like feedback on, such as introducing a passenger code of conduct and how we deliver parts of our service in the future. For example, by proposing the introduction of meeting points for travel as part of our Independent Travel Training (ITT) programme that we are in the process of shaping.

2. Bristol City Council Home to School (16-25) Travel Support Policy

Most young people who use Home to School Travel can access their education or training by walking or public transport. Where communities are not well served by public transport, several providers offer arrangements such as the Bursary Fund and concessionary schemes listed on the Local Offer and our travel support policy.

We have included this list of travel support options for pupils in the new policy, so it is clearer to parent/carers what is available.

Currently young people aged 16 to 18 who do not have an Education, Health and Care Plan (EHCP) or a disability are responsible for all of their own travel costs and arrangements.

We have reviewed travel support options for pupils aged 16 to 18 and propose to remove council- arranged vehicles. This is different from our current policy but still is in line with DfE guidance.

The changes in the new policy would start for any pupils transitioning into post-16 education as of September 2025, or any pupils in years 12 or 13 starting a new course in September 2025. Taking this approach means we can engage with parents and carers over a longer period and facilitate strategies that ensure we're not disadvantaging those who do not have access to transport networks or resources. This proposal is being taken to Cabinet for decision, taking into account the consultation responses in March 2024.

1.2 Who will the proposal have the potential to affect?

Bristol City Council workforce	Service users	□ The wider community
Commissioned services	□ City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

Yes No [please select]

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <u>How we measure equality and diversity (bristol.gov.uk)</u>

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here <u>Data, statistics</u> <u>and intelligence (sharepoint.com)</u>. See also: <u>Bristol Open Data (Quality of Life, Census etc.)</u>; <u>Joint Strategic Needs</u> <u>Assessment (JSNA)</u>; <u>Ward Statistical Profiles.</u>

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as <u>HR Analytics: Power BI Reports (sharepoint.com)</u> which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the <u>Employee</u> <u>Staff Survey Report</u> and <u>Stress Risk Assessment</u>

Data / Evidence Source	Summary of what this tells us
[Include a reference where known]	
Home to School Travel Service provision data. Successful policy and programmes held by other Local Authorities and City of Bristol college. Independent travel training - Liverpool City Council Independent Travel Training - Nottingham City Council Request Independent Travel Training from HBC (halton.gov.uk) Travel Training Service - City of Bristol College	The data shows us the current service users, which includes protected characteristics information on age, gender, ethnicity, religion, disability, and socio- economic status. However, there are some gaps in information so we have plans to try and collect data on characteristics via the pupil information form to improve this. This data can't be shared for confidentiality reasons, but equalities considerations based on data will be made. We are aware that a large proportion of service users are African, Caribbean, Somali and Asian of families. We will continue to draw on evidence and lessons learnt from other LAs delivering similar schemes across the UK. We would seek to pilot something based on the success at city of Bristol college.
Children in Care Data	There are currently 727 children in care 57% are male and 43% female (compared to 51% and 49% of the overall child population). 9% are Disabled children (compared to 6.1% of the total Bristol child population) and the majority (73%) are aged 10-17. Ethnicity: 60% White (compared to 72% across the total Bristol child population) 16% Mixed Race 12% Other Ethnicity 9% Black British 3% Asian/Asian British

2.2 Do you currently monitor relevant activity by the following protected characteristics?

🖾 Age	🛛 Disability	🗌 Gender Reassignment
Marriage and Civil Partnership	Pregnancy/Maternity	🖾 Race
🛛 Religion or Belief	🖾 Sex	Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We know there are gaps in local diversity data, especially where this is has not historically been included in statutory reporting. For this cohort, data such as marriage and civil partnership, pregnancy/maternity and sexual orientation would not be relevant and therefore not historically captured. Gaps in data will exist as it becomes out of date or is limited through self-reporting.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to <u>Managing a change process or</u> <u>restructure (sharepoint.com)</u> for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

A 6-week consultation with service users opened on 4th December to 17 January 2024 where proposals were outlined via a survey for feedback. This was available in easy read format and other languages as requested. The consultations responses have informed the proposals being taken to Cabinet for a decision in March 2024. Responses were received from parents and carers, as well as from other stakeholders. The consultation highlighted a range of views which have been considered as part of the decision-making process and proposed changes to policies. Many responses were in support of proposed changes. Responses in disagreement with proposals have been taken into consideration and informed our approach.

Based on the public consultation survey, the following points have informed changes to proposals:

- clarification of support available for children and young people this will be clear within the policy.
- ensuring parents and carers have enough information and time to plan for change we will phase the introduction of our post 16 policy so that school choices have been made with full knowledge of travel support options.
- working with parents and carers to pilot proposals such as pick up points, and piloting these before making wholesale changes.
- amending and clarifying wording in the passenger code of conduct.
- outlining the process taken to make exceptions to the 6-week cut-off for applications.
- Future service delivery transformation will be developed and progressed in collaboration with parents and carers.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

The Service will take the lead on engagement with stakeholders based on current engagement approaches. We have a communications <u>plan</u> that was used to notify stakeholders that the consultation was happening and which will be used to follow up on the outcomes and evaluation of the consultation.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. Equality Impact Assessments (EqIA) (sharepoint.com)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS	(highlight any potential issues that might impact all or many groups)
The policy proposals rel	ate to a service specifically for children of school age.
PROTECTED CHARACTE	RISTICS
Age: Young People	Does your analysis indicate a disproportionate impact? Yes \boxtimes No \square
Potential impacts:	Discontinuing the current policy for travel support for 16+, could make it more difficult for 16- to 18-year-olds to access further education. There may be a high impact for a minority of students either with no access to either public bus services or private transport, or on low income and unable to afford daily fares.
Mitigations:	Many 16- to 18-year-olds will be able to travel by alternative means, generally public bus services or private transport. The service is also introducing an Independent Travel Training Programme, which is widely used in other local authorities, to improve independence in children and young people and provide them with key life skills. The service would recommend where appropriate for young people to undertake the training. We acknowledge that in some cases this would not be possible and alternative support may be considered. Those students under age 16 from low-income families are protected by special statutory arrangements.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes \Box No $igtimes$
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes 🗵 No 🗌
Potential impacts:	Discontinuing the current policy for travel support for 16+, could make it more difficult for 16- to 18-year-olds to access further education. There may be a high impact for a minority of students either with SEND, no access to either public bus services or private transport, or on low income and unable to afford daily fares.
Mitigations:	It is acknowledged that some young people will not be able to use alternative transport. As part of EHCP assessment, those pupils where it is not appropriate based on their needs other arrangements would be put in place. There are also plans for the service to implement an independent travel training programme. The programme focuses on enabling individuals to travel independently to and from school, college, or other social activities. It is open to young people with any kind of additional need and typically covers a variety of topics depending on the needs of the student, such as personal safety, road safety, following directions, buying tickets, recognising, and avoiding dangerous situations and boarding the correct bus in the right direction.
Sex	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
Potential impacts:	Statistically women are more likely to be the primary care givers to children; therefore, the scheme may have a greater overall impact on the lives of women than on the lives of men.
Mitigations:	 This inequality is a result of ingrained societal trends and would be very difficult to avoid in any scheme relating to schools. The situation should be monitored closely alongside any service delivery changes; due consideration will be given to any formal or informal comments regarding imbalances in the effects of the scheme based on sex.

Sexual orientation	Does your analysis indicate a disproportionate impact? Yes No
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🖂
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes 🗆 No 🖂
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes 🛛 No 🗆
Potential impacts:	A large proportion of service users are African, Caribbean, Somali and Asian
Mitigations:	As part of the consultation and policy changes other languages will be made available of
White Battons.	key documentation and verbal engagement groups are being considered to engage with
	some groups.
Religion or	Does your analysis indicate a disproportionate impact? Yes \boxtimes No \square
Belief	
Potential impacts:	Based on the data held by the service there is a greater number of service users within
•	this cohort who are Muslim.
Mitigations:	We will identify opportunities to engage around religious festivals.
Marriage &	Does your analysis indicate a disproportionate impact? Yes No
civil partnership	
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHAR	ACTERISTICS
Socio-Economic	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No \Box
(deprivation)	
Potential impacts:	A proportion of the young people are from the most deprived areas of Bristol.
	Discontinuing the current policy for travel support for 16+, could make it more difficult
	for 16- to 18-year-olds to access further education. There may be a high impact for a
	minority of students either with no access to either public bus services or private
	transport, or on low income and unable to afford daily fares.
Mitigations:	Those students under age 16 from low-income families are protected by special
	statutory arrangements. For those over 16, there are several bursary and concessionary
	schemes outlined in the policy. In exceptional cases personal travel budgets to arrange
•	their own travel will be provided.
Carers	Does your analysis indicate a disproportionate impact? Yes 🛛 No 🗌
Potential impacts:	This could make it more difficult for young carers to access further education. There
	may be a high impact for a minority of students either with no access to either public
	bus services or private transport, or on low income and unable to afford daily fares.
Mitigations:	Those students under age 16 from low-income families are protected by special
	statutory arrangements and support for young carers. For those over 16, there are
	several bursary and concessionary schemes outlined in the policy. In exceptional cases
Other every fol	personal travel budgets to arrange their own travel will be provided.
	additional rows below to detail the impact for any other relevant groups as appropriate e.g.
	es; care experienced; homelessness; armed forces personnel and veterans]
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our <u>Public Sector Equality Duty</u> to:

✓ Eliminate unlawful discrimination for a protected group

- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Independent Travel Training is a new scheme we will introduce as part of the policy review to support Disabled children and young people, and we are specifically putting this in to improve their independence.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

Based on service data and knowledge of the cohort there are potentially negative impacts for young people, Disabled young people, from Black, Asian and Minoritised Ethnic group and those from the most deprived areas of Bristol.

The main negative impact for individuals is the proposed removal of travel support for council supported vehicles for pupils aged 16-18.

We are taking reasonable steps to ensure those who will have impact from this proposal are aware of the bursary and concessionary schemes available for them and can feedback in ways that work best within the community and target engagement accordingly by providing alternative formats in other languages.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

We are reviewing the current policies for home to school travel support to ensure that council policies are still in line with national guidance, fair for children and families and represent effective use of available resources. There are potential financial savings for the Council, which is important at a time when the service budgets are under significant pressure in an area where demand is increasing.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Improvement of service delivery – there is an opportunity to improve the way the service is delivered in a more efficient way and introduce new schemes such as independent travel training to improve independence in children and young people and provide them with key life skills.	Gail Rogers	Sep 24
Regularly reviewing ongoing feedback from /parents/carers/young people/school.	Terri Knowlton / Gail Rogers	On-going
Giving people a clear and easy way to share views / comment on the scheme.	Gail Rogers	Dec 23
Seeking advice from Equalities and Inclusion Team.	Terri Knowlton	On-going
Capturing data in our travel/pupil application form to inform gaps in our knowledge	Terri Knowlton /Alex Watkins	May 24

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Via feedback on the consultation and engagement with parents and carers on how we make plans to implement the policy and pilot an independent travel training programme. We will continually review the EqIA as we go during the implementation of any changes to policy.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off:
	Vanessa Wilson, Director of Children and Education
	Transformation
Date: 22/2/2024	Date: 22/2/2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.