

Appendix 2a

Equality, Diversity, Cohesion and Integration Impact Assessment



As a public authority we need to ensure that all our strategies, policies, service and functions, both current and proposed have given proper consideration to equality, diversity, cohesion and integration. In all appropriate instances we will need to carry out an equality, diversity, cohesion and integration impact assessment.

This form:

- can be used to prompt discussion when carrying out your impact assessment
- should be completed either during the assessment process or following completion of the assessment
- should include a brief explanation where a section is not applicable

Directorate: Children's Services	Service area: Contracting and Strategic Investment
Lead person: Gerry Hudson	Contact number: 224 3635
Date of the equality, diversity, cohesion and integration impact assessment: 24 th September 2013	

1. Title: The review of two aspects of the Children's Services transport policy and strategy: <ul style="list-style-type: none">• discretionary transport available to children on the basis of a parent's non-faith or belief• discretionary transport available to children attending single sex schools on the basis of a parent's religion or belief
Is this a: <div><input checked="checked" type="checkbox"/> Strategy /Policy <input checked="checked" type="checkbox"/> Service / Function <input type="checkbox"/> Other</div> If other, please specify

2. Members of the assessment team:

Name	Organisation	Role on assessment team e.g. service user, manager of service, specialist
Gerry Hudson	Leeds City Council	Service Lead
Allan Hudson	Leeds City Council	Manager of Service
Rachael Davison	Leeds City Council	Project Manager
Alice Fox	Leeds City Council	Policy & Performance Officer
Paul McGrath	Leeds City Council	Project Officer
Anne Oldroyd	Leeds City Council	Legal Services

3. Summary of strategy, policy, service or function that was assessed:

This Equality Impact Assessment focuses on the remaining discretionary elements of the Children's Services Transport Policy and the potential impacts on some equality groups receiving this transport if they are removed.

The policy review included an initial phase of public consultation which took place between 27th February and 24th April 2013 and sought views on the continuance, amendment or removal of discretionary transport. The review itself focused on all the school transport expenditure not just discretionary elements as there is an acknowledgement that efficiencies and savings can be made across the service as a whole.

The Executive Board's decision made on 17th July 2013 was to phase out four of the discretionary elements within the previous policy. The four discretionary elements were non-statutory home to school travel to faith schools; post 16 mainstream transport, post 16 (up to age 25) home to school/college transport for young people with special educational needs (SEN) and travel to a school that is not the nearest school (up to 15 miles), if the authority is unable to provide a place at a nearer school. Separate equality assessments have been previously completed and are available on request.

In the case of post 16 SEN transport a final decision on the detailed proposal was deferred pending the outcome of the publication of the guidance in respect of the new Children and Families Act. The Executive Board agreed in principle, however, to an approach which would include the introduction of a means-tested personalised budget.

The decision by the Board was subsequently called-in and considered by the Council's Scrutiny Board on the 7th August 2013. Whilst the decision was that the new transport policy should be implemented, the Scrutiny Board registered concern at a potential discrepancy in the revised policy which continued to make provision of discretionary transport available, where particular criteria are met (see Home to School Transport Guidance 2006) This was on the basis of to:

- children with no faith, and
- children attending a single sex school on the basis of a parent's religion or belief

In order to appropriately address the concerns raised, a supplementary consultation was carried out specifically on whether or not discretionary free transport should continue to be available on the basis of non-faith or a parental preference for a single sex education for their child based on their belief. This supplementary consultation took place between 2nd September 2013 and 9th October 2013.

Additional information

Any changes to the Children's Services Transport Policy will not affect eligibility to statutory transport. A range of new ways of providing statutory provision are being implemented and considered as part of a fundamental shift in the way all children's transport is provided.

4. Scope of the equality, diversity, cohesion and integration impact assessment (complete - 4a. if you are assessing a strategy, policy or plan and 4b. if you are assessing a service, function or event)

4a. Strategy, policy or plan (please tick the appropriate box below)	
The vision and themes, objectives or outcomes	<input type="checkbox"/>
The vision and themes, objectives or outcomes and the supporting guidance	<input type="checkbox"/>
A specific section within the strategy, policy or plan	<input checked="" type="checkbox"/>
Please provide detail: This assessment focused on funding for transport provided on a discretionary basis to single sex and non-faith schools.	

4b. Service, function, event please tick the appropriate box below	
The whole service (including service provision and employment)	<input type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input checked="" type="checkbox"/>
Procuring of a service (by contract or grant) (please see equality assurance in procurement)	<input type="checkbox"/>
Please provide detail: Assistance is provided for children who attend single sex and non-faith schools in order to support them with their home to school/college journeys.	

5. Fact finding – what do we already know
Supplementary Consultation facts and figures The supplementary consultation took place between 2 nd September and 9 th October 2013 and focussed on the two remaining discretionary elements within the approved transport policy. <u>Children attending single sex school on the basis of a parent's religion or belief</u> <ul style="list-style-type: none"> • The law only requires Leeds City Council to fund transport for children of secondary age from families on qualifying low income. This includes a parental preference for their child to attend a single sex school in order for their child to receive an education on the basis of their religion or belief. • The total cost of single sex based education in 2013/14 is approximately £6,375

affecting 23 children in years 7 to 11.

- A free bus pass is provided to the pupil, which is used on a commercial bus route.
- Fifteen of these children, who now attend the E-Act Academy, have a legacy entitlement from the former Parklands Girls High School. None of the 'legacy' children at the E-Act Academy would be affected by the changes as the proposed phasing in period would enable them to complete their compulsory education on the current basis.
- There are eight children from four families in receipt of support on a discretionary basis who attend Batley Girls High School in years 7 to 11.
- Four of the children will complete their compulsory education at Batley Girls High School during the phasing period. All applicants are reassessed for eligibility on an annual basis.

Children whose parents want them to attend a school on the basis of non-faith or beliefs

- The law only requires Leeds City Council to fund transport for children of secondary age from families on qualifying low income, whose parents want them to attend a school, on the basis of religion or belief, which can include no belief in a religion, but could also include a Humanist or Atheist belief.
- The effect of a parent's preference can mean their nearest school is not preferred and that their decision will require the council to provide discretionary travel to a more distant non-faith school.
- There have been no requests for this provision in the current academic year. There has consistently been no demand for this provision in the last five years.

Supplementary Consultation Process

The consultation was conducted via an online survey which focussed on these two types on transport. The dedicated consultation webpage was updated to promote the consultation which included a downloadable hard copy of the survey and the latest transport policy.

The communication plan identified key stakeholders and the ways in which they would receive information and have their views heard. The plan was supported by the Voice and Influence Team who took a lead in communicating with their networks to ensure maximum engagement of parents and carers and children and young people.

The plan involved contacting all key stakeholders e.g. head teachers, Elected Members, heads of service, the Leeds Humanists and other voluntary sector groups. They were directed to the consultation webpage and asked to comment themselves but also encouraged to share information with their networks, service users and anyone who would be directly affected by any changes to the policy.

All those who are directly affected by the changes were contacted by letter. This was also extended to those who have previously benefited from transport to single sex schools. The letter informed them of the consultation and directed them to the webpage. A hard copy of the survey was included as an alternative method of responding. The letter was followed up with a telephone call to ensure they fully understood the background to the consultation and the potential changes to the policy. They were encouraged to complete the survey and

any comments they made were noted. A second reminder letter was also sent out.

The consultation featured on INSITE and was included in the 'essentials' communication email which is viewed by LCC employees. The Citizen's Panel were also contacted to attract responses from people who may not be directly affected in order to gather a balanced viewpoint.

After the consultation closed the data was coded and the analysis was used to inform the equality impact assessment and for inclusion in the executive board papers.

Geographical information

If the new draft transport policy is approved it could potentially impact upon children and young people and their families from across all districts of Leeds. The Council will continue to monitor any impact the withdrawal of this discretionary transport has on any particular areas.

However, due to the low numbers who take up this provision, it could be supposed that there would be no dramatic increase in admissions demand for local schools if parents withdrew them from Batley Girls school. The age of the pupils is also spread across year groups therefore any impact would be negligible.

Financial impact

Low income families will still continue to receive statutory assistance subject to other qualifying criteria in accordance with the Transport Policy. During 2012/13, zero fare passes were funded for approximately 430 children solely on the basis of extended rights for low income families.

There is also an established appeals process which will review the entitlement to free transport on a case by case basis.

If a decision is made to end discretionary transport to non-faith and single sex schools then a phased withdrawal would help parents of the four children who are affected to budget for the impending change. There would also be an opportunity to be assessed on the basis of qualifying low income.

Equality monitoring

If the decision is made to phase out transport to single sex schools over a two year period, there would only be four girls who would be affected after August 2015. The table below shows the equality breakdown of these four children.

Personal information and Indicators of recipients of discretionary funding	Total number of individuals
Total male	0
Total female	4
with English as second language	2
with a disability	0
Religion	
Muslim	3
Christian	0
None	0
Unknown	1

Ethnicity	
Pakistani	1
Kashmiri Pakistani	1
Unknown	0
Other	2
Postcodes of recipients of discretionary funding	
LS11	3
LS27	1

There are currently no children who receive transport to non-faith schools. However 14 survey respondents believed that they would be affected by this service. We cannot explain how or why they perceive themselves to be affected given that no children receive this transport currently on the basis of no religion or belief.

Are there any gaps in equality and diversity information

Please provide detail:

None

Action required:

6. Wider involvement – have you involved groups of people who are most likely to be affected or interested

☒

Yes

☐

No

Please provide detail:

The supplementary consultation was promoted in a similar way to the first consultation with the stakeholders and interested parties previously identified contacted again.

Due to the lower numbers of those affected by these discretionary services it was possible to contact them directly to make them aware of the potential changes in provision. They were contacted by letter which also included a hard copy of the survey. This was later followed up by a telephone call to ensure that the families had a full understanding of the consultation and to encourage them further to share their views.

Group submissions of the surveys were encouraged so that people did not have to respond as an individual.

The timescales for the consultations were extended to maximise the number of respondents and took into account school holidays.

Action required:

7. Who may be affected by this activity?														
<p>Equality characteristics</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 33%; vertical-align: top;"> <input checked="" type="checkbox"/> Age </td> <td style="width: 33%; vertical-align: top;"> <input checked="" type="checkbox"/> Carers </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Disability </td> </tr> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Gender reassignment </td> <td style="vertical-align: top;"> <input type="checkbox"/> Race </td> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> Religion or Belief </td> </tr> <tr> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> Sex (male or female) </td> <td colspan="2" style="vertical-align: top;"> <input type="checkbox"/> Sexual orientation </td> </tr> <tr> <td colspan="3" style="vertical-align: top;"> <input checked="" type="checkbox"/> Other - Income </td> </tr> </table> <p>(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)</p> <p>Please specify:</p> <p>There will be a financial impact on the four families who are not eligible for transport on the basis of qualifying low income.</p>			<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Carers	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Race	<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex (male or female)	<input type="checkbox"/> Sexual orientation		<input checked="" type="checkbox"/> Other - Income		
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<p>Please specify</p> <p>This proposal could be politically sensitive.</p>

8. Positive and negative impact
8a. Positive impact:
<p>The review of the council's current transport policy has raised the following positive issues;</p> <ul style="list-style-type: none"> • The Executive Board has already agreed to a phased approach, rather than an immediate withdrawal of discretionary transport, on the basis of attending a faith school. If this transitional arrangement is extended to travel to a non-faith or a single sex school, on the basis of no faith and religion or belief, it will enable those parents who currently benefit to prepare for the extra cost in two years. • The overall consultation process has raised awareness of the costs of transport to the wider public. • The continued process has further stimulated new and innovative ideas for a broader range of services which could be provided to meet individual needs. • The policy changes and continuing efficiencies provide long term savings for the Council allowing for funding to meet targets and the ability to maintain essential services.
Action required:
<ul style="list-style-type: none"> • Seek to implement in partnership, new ways of providing better services to all children and young people

8b. Negative impact:
<p>A decision to remove the two elements of discretionary transport from the current transport policy could potentially result in the following negative impacts which need to be considered:</p> <p>Negative Impact on Families</p> <ul style="list-style-type: none"> • If discretionary transport is no longer provided it is possible that some families would be more likely to be impacted upon financially than others. Based on current recipients this is more likely to affect BME families in the case of single sex transport. • If discretionary transport was no longer provided then some young people and families may not select their first choice preference due to the cost of transport. <p>Negative Impact on the Council</p> <ul style="list-style-type: none"> • There could be a reputational impact if any changes to the transport policy are not carefully explained both to those affected as well as to the wider community • Any changes could be seen to contradict the Council's aim to be a child friendly city. • Children and young people have said that affordable transport and feeling safe on public transport are important to them.
Action required:

If the review results in changes to the current transport policy, as recommended, the actions below may help to mitigate the negative impacts:

Mitigating the negative impact on families

- A planned communication strategy will be developed so any changes to the policy are clearly explained in a timely and accessible way. This will be done through close working with schools, colleges, families and other key agencies.
- The provision could be phased out in line with the withdrawal of other discretionary elements from the policy. Families will then be given plenty of notice before transport provision is amended to help mitigate the impact.
- Information explaining the low income eligibility criteria will need to be available and families will have to be given plenty of time to apply. Consideration will need to be given to the format and will take into account individual's requirements e.g. language barriers.
- On-going work with Metro to improve the offer of child friendly transport including driver training and concessionary fares.
- An appeal process will be retained that provides for discretionary provision on the grounds of exceptional hardship and this will be communicated to families.

Mitigating the negative impact on the Council

- A planned communication strategy will be developed so any changes to the policy are clearly explained in a timely and accessible way. This will be done through close working with schools, colleges, families and other key agencies.
- On-going work with Metro to improve the offer of child friendly transport including driver training and concessionary fares.

9. Will this activity promote strong and positive relationships between the groups/communities identified?

☐

Yes

☐

No

Please provide detail: Not applicable, in view of the low numbers who are affected.

Action required:

10. Does this activity bring groups/communities into increased contact with each other (e.g. in schools, neighbourhood, workplace)?

☐

Yes

☐

No

Please provide detail: Not applicable, in view of the low numbers who are affected.

Action required:

11. Could this activity be perceived as benefitting one group at the expense of

another?	
<input checked="checked" type="checkbox"/> Yes	<input type="checkbox"/> No
Please provide detail: Continuing discretionary transport to single sex and non-faith schools could be seen to benefit these groups over others.	
Action required:	

12. Equality, diversity, cohesion and integration action plan

(insert all your actions from your assessment here, set timescales, measures and identify a lead person for each action)

Action	Timescale	Measure	Lead person
<p>The development of a communication schedule which will notify people of key messages.</p> <p>The schedule will identify how messages will be communicated and in what format and will carefully consider any potential communication barriers.</p> <p>Termly updates using a variety of existing methods.</p>	<p>Each academic term.</p>	<p>All children, young people and their families will be made aware of any agreed changes and any key messages during the year.</p> <p>Any information which is shared with families will be accessible to all and will invite individuals to contact the transport team if they require it in another format e.g. community language or braille.</p>	<p>Paul McGrath</p>
<p>Establish an implementation steering group.</p>	<p>Meetings to take place very two months.</p> <p>First meeting 13th November</p>	<p>Meetings arranged every two months for a strategically led challenge group with task and finish groups delegated to undertake any developments.</p>	<p>Sarah Sinclair</p>

13. Governance, ownership and approval

State here who has approved the actions and outcomes from the equality, diversity, cohesion and integration impact assessment

Name	Job Title	Date
Sarah Sinclair	Chief Officer, Strategy, Performance and Commissioning	24 th October 2013

14. Monitoring progress for equality, diversity, cohesion and integration actions (please tick)

- ☒ As part of Service Planning performance monitoring
- ☐ As part of Project monitoring
- ☐ Update report will be agreed and provided to the appropriate board
Please specify which board
- ☐ Other (please specify)

15. Publishing

This Equality, Diversity, Cohesion and Integration impact assessment will act as evidence that due regard to equality and diversity has been given.

If this impact assessment relates to a **Key Delegated Decision, Executive Board, full Council** or a **Significant Operational Decision** a copy should be emailed to Corporate Governance and will be published along with the relevant report.

A copy of **all other** Equality and Diversity, Cohesion and Integration impact assessment's should be sent to equalityteam@leeds.gov.uk. For record keeping purposes it will be kept on file (but not published).

Date screening completed	N/A
If relates to a Key Decision – date sent to Corporate Governance	N/A
Any other decision – date sent to Equality Team (equalityteam@leeds.gov.uk)	N/A