Appendix 2b

Equality, Diversity, Cohesion and Integration Impact Assessment

Directorate: Children's Services



Service area: Contracting and Strategic

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

	Investment
Lead person: Gerry Hudson	Contact number: 224 3635
Date of the equality, diversity, cohesion 24 th September 2013	and integration impact assessment:
24 September 2013	_
1. Title: The redevelopment of the Children's Service	ces transport policy and strategy
Is this a:	
x Strategy /Policy x Service	/ Function Other
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 (EIA) focuses on the whole of the proposed Children's Services Transport Policy. It builds upon the EIAs that were submitted in July 2013 when changes were made to discretionary transport. This impact assessment considers the whole policy, including discretionary and statutory transport and the impact it may have on all transport beneficiaries and stakeholders.

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 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	x		
The vision and themes, objectives or outcomes and the supporting guidance			
A specific section within the strategy, policy or plan			
Please provide detail:			
This EIA focuses on the whole transport policy			
4b. Service, function, event please tick the appropriate box below			
The whole service (including service provision and employment)	х		
A specific part of the service (including service provision or employment or a specific section of the service)			
Procuring of a service (by contract or grant) (please see equality assurance in procurement)			
Please provide detail:			
Assistance is provided for eligible children in accordance with the transport policy.			
5. Fact finding – what do we already know			
Current provisions included in the transport policy Statutory provision This is the transport which the Council has to provide by law (Education Act 1996 as amended in 1998, 2000 and 2006) and will continue to be provided to those who are eligible, as described in the draft policy. There has been on-going work to look at efficiencies and savings across all aspects of children's transport and therefore it is not only those who receive discretionary transport who are likely to see changes to provision. For example reassessing transport on an individual basis for children who are looked after may reduce the current dependency on taxis. Any changes to transport for any person eligible under the policy will involve a thorough assessment of individual's needs, circumstances and vulnerabilities on a case by case basis. All involved parties will need to be happy with the new arrangements prior to changes being made.			

Discretionary provision

This is the transport which the Council does not have to provide by law. Current provisions include transport for:

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

Recent changes to the transport policy

The 1st October 2013 policy saw the removal of discretionary provisions for:

- discretionary faith school transport
- home to school/college transport at age 16 plus
- transport to non-nearest schools in circumstances where the Council is unable to provide a school place within 3 miles of home

On the 17th July 2013, Executive Board also agreed to delay a decision on the future of transport for post 16 SEN students. During the academic year 2013 to 2014 the Council intends to publish a new section to this policy for students with a statement of SEN. This will describe the support provisions and relevant protections (and limitations) which will be available from September 2014 for all SEN students. This will also take into account the provisions of the new Children and Families Act due to be enacted in 2013 and implemented in 2014. The policy changes will be supported by a further EIA regarding SEN transport.

Proposed further changes to the transport policy

Following the conclusion of the supplementary consultation the Executive Board has been asked to accept recommendations for the removal of the remaining discretionary provisions, 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:

- transport for children on the basis of a parent's non-faith,
- transport for children attending single sex schools on the basis of a parent's religion or belief.

Transitional arrangements

The proposal includes the phasing out of discretionary elements over a two year period, rather than an immediate withdrawal. This will give sufficient time for parents to adjust to the new policy and budget accordingly. This approach is consistent with previous policy changes which gave protection to families currently benefitting from these provisions over a two year period.

Transport arrangements will still be available to families on a parent to pay basis.

Other arrangements

Transport is also provided to approximately 750 children who are looked after and costs £2.5 million per annum. This provision is not discretionary in terms of the actual support provided but potential efficiencies are nevertheless being identified in how these services are currently provided.

In addition, Leeds City Council is currently party to a West Yorkshire wide agreement with Metro at a cost of £3.1million per annum. This contributes to off-setting the cost of providing concessionary fares for all citizens in Leeds from which approximately 40,000

young people benefit. The Council will continue to work with Metro to improve this offer.

Statistical information for the 2012/13 academic year.

Type of discretionary provision	Cost per year £	Number of pupils per year
Children who choose to attend a school on the basis of faith	800k	2,600
Post 16 transport to mainstream schools and colleges	1.36m	4,245
Travel to a school that is not the nearest appropriate school	150k	181
The following information relates to th	e 2013/14 academ	nic year
*Children attending a single sex school on the basis of a parent's belief	6.357k	23
*Children attending a school on the basis of a parent's non-faith or belief	No Cost	No pupils

^{*}these two elements are included in the recommendations in the Executive Board paper to be presented on 6th November 2013.

Independent Travel Training

Independent Travel Training (ITT) has recently been introduced in Leeds. This is a service that currently works primarily with young people with SEN. It is designed to help individual children to learn how to travel as independently as they can. This quality service has proved very popular and efficient both in improving children's confidence and saving money. It can help some young people move away from using a taxi every day to school or college and become able to use public transport sometimes with the help of a 'travel buddy'. ITT is not suitable for all young people with SEN.

There is currently a recruitment process underway in order to double the capacity in Independent Travel Training Team. The expansion of the team will allow for support to be extended to children who are looked after to enable them to travel more independently.

Consultation Process

Two periods of consultation took place during the transport policy review. The first took place between 27th February and 24th April 2013 and sought views on the continuance, amendment or removal of some elements of discretionary transport. The initial consultation was principally in the form of a survey, which was also adapted into a children and young people version. The supplementary consultation took place between 2nd September 2013 and 9th October 2013 and focused 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.

A communication plan was used which identified key stakeholders and the ways in which the Council planned to communicate the consultation process and seek as wide a range of views as possible. 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.

For the duration of the review a dedicated webpage was established which had a link to the electronic surveys and provided accompanying information for the respondents, including a copy of the current transport policy. The creation of a mailbox also enabled people to contact the team directly and raise any queries or views.

The plan involved contacting all key stakeholders e.g. head teachers; Specialist Inclusive Learning Centre (SILC) Principals; Elected Members; diocesan leads, heads of service, and 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.

A number of consultation meetings took place during the initial consultation period, at the request of different schools. Over 400 people attended these public forums to get more information on the review process and to share their views. An Outcomes Based Accountability (OBA) workshop also took place and was attended by key agencies.

The supplementary consultation was carried out primarily through an online survey. Due to the lower numbers, 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 about 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 consultations both featured on INSITE and were 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 consultations closed the data was coded and the analysis was used to inform the impact equality assessments 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 geographical impact in terms of an increased demand on local schools cannot be predicted. The impact on the admissions at local schools will not be known until the discretionary transport has been fully phased out and will be determined by parental preference.

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 non-statutory transport on a case by case basis.

A phased withdrawal will help parents to budget for the impending change.

Equality monitoring

The actual equality data relating to recipients of discretionary transport is not available. This information is not collected when parents apply for transport assistance as this is not required when making an assessment for eligibility.

However, both adult consultation surveys included an equality monitoring section. The respondents equality profiling has been compared to the population of Leeds and is considered to be representative of the city as a whole. This data was taken from the Leeds Observatory.

Further equality data for the survey respondents is available on request.

Are there any gaps in equality and diversity information Please provide detail:

Yes

Action required:

Future application forms for assistance with home to school travel costs will include an equality monitoring section. This will provide on-going information about the take up of the service from a range of equality groups. This will enable better targeting of the service if required.

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

х	Yes	No

Please provide detail:

In total over 2,600 adults, children and young people participated directly in both consultations. This included current recipients of discretionary provision. The initial adult survey asked the question 'Which service directly affects you? The table below shows a breakdown of how people responded:

Table 1

Type of service	Count of responses	% of respondents*
Transport for children who choose to attend a school on the basis of faith or beliefs	780	49.06%
Post 16 transport to mainstream schools and colleges	310	19.50%
Post 16 transport for young people with Special Educational Needs (SEN)	180	11.32%
Transport to a school which is not the nearest appropriate school	220	13.84%
I am not affected by any service	411	25.85%

^{*}Respondents could provide more than one response so % will not total 100%

Source: Adult Transport Survey

The supplementary consultation survey asked the question 'which service directly affects you'. The table below shows a breakdown of how people responded:

Type of service	Count of Responses	% of respondents
Children attending single sex school on the basis of parents' belief or philosophical beliefs	4	1.06%
Children whose parents want them to attend a school on the basis of non-faith or beliefs	14*	3.69%
I am not affected by any service	361	95.25%

^{*14} respondents believed that they were affected despite the fact that no assistance is currently provided.

Source: Supplementary Consultation Transport Survey

To ensure the participation of children and young people an alternative version of the first survey was made available and promoted through child friendly websites e.g. Breeze, Generation M. An informal information session was also organised with the Youth Council and information was shared in a quiz style format.

The supplementary consultation was promoted in a similar way to the original stakeholders and interested parties previously identified, who were contacted again. Due to the lower numbers of those directly affected by these discretionary services it was possible to contact them directly to make them aware of the potential changes in provisions. 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.

The consultation meetings gave an opportunity for people to voice their comments or concerns as an alternative to completing the survey. These were offered for both consultations.

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	:
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7.	7. Who may be affected by this activity?	
	. The may be another by the activity.	

Equality characteristics		
X Age	X Carers	x Disability
Gender reassignment	Race	X Religion or Belief
x Sex (male or female)	Sexual orienta	ation
X Other - Income		
(for example – marriage and civil partner income, unemployment, residential local		•
Please specify: Those currently receiving discretionary to affected. Some children and young people changes to their current arrangements be individually assessed. The draft policy deligibility to statutory provision. This will	ple benefitting from sta out this would not be kr does not affect children	tutory transport may see nown until they are
Stakeholders		
Stakeholders X Services users	Employees	Trade Unions
x	Employees X Members	Trade Unions Suppliers
X Services users		
x Services users x Partners		
X Services users X Partners Other please specify	X Members	
X Services users X Partners Other please specify Potential barriers.	X Members	Suppliers of premises and services
X Services users X Partners Other please specify Potential barriers. Built environment Information	X Members X Location X Custome	Suppliers of premises and services

x specific barriers to the strategy, policy, services or function

Please specify

This proposal could be politically sensitive.

The Government is increasing the age to which all young people in England must continue in education or training, requiring them to continue until the end of the academic year in which they turn 17 from 2013 and until their 18th birthday from 2015. This could have a further financial impact on families.

8. Positive and negative impact

8a. Positive impact:

The full review of the council's current transport policy has raised the following positive issues:

- 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 transitionary 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 process has stimulated new and innovative ideas for a broader range of services which could be provided to meet individual needs
- An increase in Independent Travel Training will encourage independence and build confidence and self-esteem for young people with SEN
- Reassessing transport on an individual basis for children who are looked after will reduce dependency on taxis and therefore safely increase independence and confidence
- There has been an increase in partnership working and an appreciation of the full costs of providing this support
- 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:

 Seek to implement in partnership, new ways of providing better services to all children and young people

8b. Negative impact:

The draft transport policy could potentially result in the following negative impacts which need to be considered.

Negative Impact on Families

• If discretionary transport is no longer provided it is possible that some families would be more likely to be impacted on financially.

If transport was no longer provided by LCC then some young people and families may not select their first choice preference due to the cost of transport.

Negative Impact on Schools/Colleges

- School places may not be available if families decide to change schools due to any amendments to the transport policy.
- Attendance and Children Not in Education, Employment or Training (NEET) may be impacted upon if children and young people no longer have access to discretionary transport
- The demography within schools could change if schools are only attended by those who can afford transport costs or have an extended right to discretionary travel.

Negative Impact on the Council

- 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 councils aim to be a child friendly city. Children and young people have said that affordable transport and feeling safe on public transport were important to them.
- More vehicles may be on the road if parents/carers decide to transport their children. This could lead to an increase in congestion and be contrary to the Council's green policies
- There may be an increase in the number of appeals.

Action required:

If the review results in the transport policy being changed, 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 phasing out of discretionary elements over a two year period, rather than an immediate withdrawal, gives sufficient time for parents to adjust to the new policy and budget accordingly.
- Dedicated bus services will continue to be available therefore parents will not have to transport their own children
- An appeal process will be retained that provides for discretionary provision on the grounds of exceptional hardship and this will be communicated to families.
- The service lead officers will continue to establish whether schools and colleges could fund transport through bursaries for individual cases.

Mitigating the negative impact on schools/colleges

- Teams working in relation to school admissions and sufficiency would be informed of any changes to the policy. Any changes in parental preferences would be closely monitored to ensure that any trends that start to emerge during the two year transitional period are acted on.
- Monitor the impact any policy changes have on NEET and attendance by liaising with schools and colleges.
- On-going work with Metro to improve the offer of child friendly transport including driver training and concessionary fares.

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.
- Dedicated bus services will continue to be available therefore parents will not have to transport their own children so an increase in traffic and congestion will be minimal.
- The current appeals system can be reviewed if demand for appeals rises significantly. This could mean a greater use of officer discretions.

9. Will this activity promote strong and positive relationships between the
groups/communities identified?
Yes No
Please provide detail: Not applicable
Action required:
10. Does this activity bring groups/communities into increased contact with each
other (e.g. in schools, neighbourhood, workplace)?
X Yes No
Please provide detail:
The feedback from the consultation suggested it could affect the diversity make up of local
schools and colleges.
Action no voice de
Action required:
This will be evidenced by monitoring within schools/colleges to assess any changes to
demographics over time.
11. Could this activity be perceived as benefitting one group at the expense of
another?
No.
x Yes No
Diagon muscido deteilo
Please provide detail: This draft policy could be seen as benefitting some families over others, i.e. those who are
eligible for statutory transport.
Action required:

F	DCL	impact	assessment	
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12. Equality, diversity, cohesion and integration action plan

Action	Timescale	Measure	Lead person
The development of a communication schedule which will notify people of key messages.	Each academic term.	All children, young people and their families will be made aware of any agreed changes and any key messages during the year.	Paul McGrath
The schedule will identify how messages will be communicated and in what format and will carefully consider any potential communication barriers.		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.	
Termly updates using a variety of existing methods.			
Establish an implementation steering group	Meetings to take place very two months First meeting 13 th November.	Meetings arranged every two months for a strategically led challenge group with task and finish groups delegated to undertake any developments	Sarah Sinclair
Continue to build on the partnership with the two dioceses	On-going partnership work through scheduled meetings etc.	A positive working partnership with shared outcomes.	Gerry Hudson
Explore whether any financial support can be provided if there is a change to the policy.	By Summer 2014, key actions identified and agreed.	Establish by Sept 2014 whether any financial assistance could be provided by the Catholic and Church of England dioceses for students most in need.	

Action	Timescale	Measure	Lead person
Continue to build on School and college partnerships. Explore whether any funding can be made available through school's budgets or college bursaries if there is a change to the policy	On-going partnership work through scheduled meetings etc. By summer 2014, key actions identified and agreed.	A positive working partnership with a shared outcome. Establish by Sept 2014 whether any financial assistance could be provided by schools and colleges to students most in need.	Gerry Hudson
Continue close working with Metro around any future proposals. Promote child friendly public transport, concessionary fares, driver training etc.	On-going partnership work through scheduled meetings etc. By summer 2014, key actions identified and agreed.	A positive working partnership with a shared outcome. Establish by Sept 2014 whether any financial assistance could be provided by schools and colleges to students most in need.	Gerry Hudson
Continue to invest and develop Independent Travel Training for individuals where it is appropriate	On-going work. Full strategy planned for roll out. Team to be doubled in size by Dec 2013.	An increase in the number of students travelling independently Target of 15 SEN students converted to independent travel per month. 50% of children who are currently looked after no longer dependent on taxis.	Allan Hudson
The impact of any changes made to the transport policy will be monitored on the following areas: Increase in NEET, attainment and poor	On-going work over a number of years with relevant partners.	Monitor relevant data looking for any trends which could be attributed to changes to the transport policy. Link with schools and attendance management teams	Allan Hudson

Action	Timescale	Measure	Lead person
attendance Increase in demand for more local schools creating greater pressure on educational places To include an equality monitoring section on the assessment application form.	New form to be introduced ready for use during the next academic year (2014/15)	Future application forms for assistance with home to school travel costs will include an equality monitoring section. This will provide on-going information about the take up of the service from a range of equality groups. This will enable better targeting of the service if required.	Allan Hudson
more local schools creating greater pressure on educational places To include an equality monitoring section on the	ready for use during the next	with home to school travel costs will include an equality monitoring section. This will provide on-going information about the take up of the service from a	Allan Hudson

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	24 th October 2013		
Sarari Siriciali	Commissioning	24 October 2013		

14. Monitoring progress for equality, diversity, c actions (please tick)	ohesion and integration			
As part of Service Planning performance	As part of Service Planning performance monitoring			
As part of Project monitoring	As part of Project monitoring			
Update report will be agreed and provide Please specify which board	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).				
Data covering completed				
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 N/A				
(equalityteam@leeds.gov.uk)				