

Appendix 4a

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: 23 rd May 2013	

1. Title: The redevelopment of the Children's Services transport policy and strategy <ul style="list-style-type: none">• Post 16 SEN transport
Is this a: <input checked="" type="checkbox"/> Strategy /Policy <input checked="" type="checkbox"/> Service / Function <input type="checkbox"/> 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
Viv Buckland	Leeds City Council	Head of service
Alice Fox	Leeds City Council	Senior policy & performance officer
Barry Jones	Leeds City Council	Complex needs area lead

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

Arising from the Council's budget proposals, in February 2013 permission was granted by Executive Board to move to a phase of public consultation on the current transport policy. This included consideration of the continuance, amendment or removal of the discretionary elements within the current Leeds Children's Services Transport policy and alternative ways of delivering current statutory provision. Thus the review focused on all school transport expenditure, not just discretionary elements as there is an acknowledgement that efficiencies and savings could be made across the service as a whole.

The consultation period opened on 27th February and closed on 24th April 2013. For further information on projected school transport expenditure, please see Appendix 6 of the Executive Board report (Consultation Briefing paper).

This review does not in itself affect eligibility to statutory transport, although a range of new ways of working are already being implemented and considered as part of the fundamental shift in the way all children's transport is provided.

There are, however, currently only four main discretionary elements within the current policy. These are represented by the availability of non-statutory free home to school travel to faith schools; post 16 mainstream transport to school or college, post 16 (up to age 25) home to school/college transport for young people with special educational needs (SEN) and free travel to a school that is not the nearest (up to 15 miles), if there is no place at the nearest school. These are the only home to school transport services (in significant financial terms) which the council do not have a legal obligation to provide. There are some elements of transport services provided for looked after children (not in the current policy) that are also discretionary and these are also in the process of being reviewed for efficiencies.

The withdrawal or amendment of some or all discretionary elements presents an opportunity for Executive Board to consider using savings to meet its targets and maintain essential services for those greatest in need. Should the Council seek to remove all current discretionary elements there are potential savings of up to **£4.91m**. Discretionary transport provided for post 16 SEN students equates to **£2.6m**. The consultation outlined that the options available included immediate withdrawal of provision in September 2013; elements of phasing out the provision over time and remodelling current statutory provision.

This Equality Impact Assessment considers discretionary transport for post 16 (up to age 25) home to school/college transport for young people with special educational needs. It has been separated from the other discretionary elements of the transport policy due to the specific needs of the students, where additional consideration of individuals need is required.

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

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:	
The review focused on all the school transport policy not just discretionary elements	

4b. Service, function, event please tick the appropriate box below	
The whole service (including service provision and employment)	<input checked="" type="checkbox"/>
A specific part of the service (including service provision or employment or a specific section of the service)	<input 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 to qualifying learners in order to support them with their home to school/college journeys.	

<p>5. Fact finding – what do we already know</p> <p>Make a note here of all information you will be using to carry out this assessment. This could include: previous consultation, involvement, research, results from perception surveys, equality monitoring and customer/ staff feedback.</p> <p>(priority should be given to equality, diversity, cohesion and integration related information)</p> <p>Current transport policy</p> <p>The review of the policy has involved looking at alternative or revised methods of delivery to ensure the efficiency and best value of the services including the Council's statutory obligations.</p> <p>In particular, the review has examined continued affordability to ensure that existing discretionary policies remain fit for purpose, delivering value and equitable services to Leeds residents. The table below provides details of the SEN transport services that have been reviewed.</p>
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Type of provision	Cost per year £	Number of pupils per year
Discretionary transport for young people with Special Educational Needs (SEN) post 16 years	2.6 m	350

Discretionary SEN transport for young people post 16 years

- Children and young people with a statement of SEN often qualify for funded transport
- The current policy in Leeds also provides funded transport for young people over 16 up to the age of 25.
- Sometimes this will be in a taxi or minibus, other times a parent will want to take their child to school/college themselves and we pay them a mileage allowance
- Due sometimes to a child's more complex needs a child may have to attend specialist provision to meet their particular needs, and this involves a much longer journey to school than other children This can often include the need to provide an escort, which increases the cost.
- The transport may also be provided in the form of a bus pass but more often involves individual taxis, which means the costs are much higher for those requiring greater support.
- Often a parent has their own transport but will still be provided with a taxi for their child. This may be important so that they can take their other children to school.
- The cost of providing taxi based transport on a daily basis per student ranges from £15 to £150 per day depending on the child's needs.
- Most local authorities continue to make some free transport available for young people with SEN who attend learning. Some make charges and the amount of support available varies.

Geographical Information

The educational provisions these students attend are often not within their local area and involve making long journeys to opposite sides of the city. The setting a student attends will depend on their individual needs and will be the most suitable care and learning environment for them.

If any changes were made to the current transport policy it would involve young people aged 16-25 years with Special Educational Needs (SEN) and their families from across the whole city.

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, however, suitable for all young people with SEN.

An outline business case approval has now been given for the doubling of the Independent Travel Training Team (ITT).

Consultation Process– (See appendix 3; Consultation Briefing paper; Background document Transport Consultation Paper v1.3 and appendix 5 Transport Consultation - Executive Summary)

A communications plan was drawn up identifying key stakeholders and the ways in which we planned to communicate in order seek their views. 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 such as 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 cascade information to their networks, service users and people who would be directly affected by any changes to the policy including current recipients of discretionary services.

The survey was also promoted to all LCC employees and the citizen's panel to attract responses from people who may not be directly affected in order to gather a balanced viewpoint.

A dedicated webpage was set up which included a copy of the current transport policy and a briefing paper which was written to accompany the survey. The briefing and survey clarified that a review of the full service was necessary in order both to make service improvements and make savings and efficiencies.

The main element of the consultation was in the form of a survey, also adapted into a children and young people version. Both were available electronically or as a hard copy.

Other methods of consultation included public meetings, attendance at meetings for specific groups, an Outcomes Based Accountability (OBA) workshop and an email inbox for direct communication.

The consultation invited the submission of suggested options ranging from a blanket withdrawal of discretionary services to the remodelling of existing provisions. These options were clearly laid out within the Consultation Briefing paper (appendix 3) so it was clear from the outset that all options would be open for consideration by the Executive Board.

After consultation closedown the data was analysed and all responses and comments have been incorporated into a consultation report and used as a strategy for mitigating any adverse impacts arising.

Equality Monitoring

The adult consultation survey included an equality monitoring section. These were collated for the consultation report. The full demography analysis can be found in section 7 of the consultation appendix.

The respondents equality profiling has been compared to the population of Leeds. This data was taken from the Leeds Observatory. The Leeds Observatory is a website that provides data and information about communities and geographies in Leeds.

From the analysis of the adult survey it can be seen that the respondent's ethnicity profile reflected that of the city as a whole.

The religious profiling of the respondents was also comparable to the makeup of the city's population.

There were 184 respondents that said they had a child or young person in their family that had a disability. This is considered to be a good representation of service users.

Are there any gaps in equality and diversity information

Please provide detail:

No

Action required: None

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

Yes

No

Please provide detail:

A full city wide consultation exercise has taken place; this included current recipients of free discretionary provision. Appendix 5 provides an executive summary of the analysis of the consultation exercise. In this document further detailed information is provided on the potential negative impact of implementing the recommended changes to the current policy and the proposed mitigation. Responses were received from a wide range of participants; some affected by the changes and others not.

In total over 2,200 adults, children and young people participated directly in the consultation. 1,601 respondents answered the adult survey. The children and young people's survey was completed by 271 respondents, 24 of these were group responses. A further 400 plus people attended consultation sessions which were in the form of focus groups, parents meetings and information sessions. These included specific faith, post 16 mainstream and SEN meetings. These were held in schools and colleges with head teachers, principals and governors.

The adult survey asked the question 'Which service directly affects you?' Below is a breakdown of how people responded.

	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%
Free travel 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

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

In order to cater for anyone with communication difficulties the information was sent to head teachers, college principals and service leads and asked that they cascade the information relating to the consultation. It was envisaged that they would communicate this by the same methods in which they regularly communicate messages to their service users.

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

In one SILC the staff set up a morning sessions to support parents on a 1:1 basis in completing the consultation survey in order to meet their individual needs.

Planned workshops with pupils and students with additional needs took place in the South SILC provisions and at the Leeds City College, Thomas Danby site. These were planned carefully to ensure full engagement in the consultation process. Group activities and a further version of the survey where developed to capture their views. This feedback was analysed and included in the consultation report.

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

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

Action required: None

7. Who may be affected by this activity?

please tick all relevant and significant equality characteristics, stakeholders and barriers that apply to your strategy, policy, service or function

Equality characteristics

- | | | |
|---|---|--|
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Carers | <input checked="" type="checkbox"/> Disability |
| <input type="checkbox"/> Gender reassignment | <input type="checkbox"/> Race | <input type="checkbox"/> Religion or Belief |
| <input type="checkbox"/> Sex (male or female) | <input type="checkbox"/> Sexual orientation | |
| <input type="checkbox"/> Other - Income | | |

(for example – marriage and civil partnership, pregnancy and maternity, social class, income, unemployment, residential location or family background, education or skills level)

Please specify:

Stakeholders

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Services users | <input checked="" type="checkbox"/> Employees | <input type="checkbox"/> Trade Unions |
| <input checked="" type="checkbox"/> Partners | <input checked="" type="checkbox"/> Members | <input checked="" type="checkbox"/> Suppliers |
| <input type="checkbox"/> Other please specify | | |

Potential barriers.

- | | |
|--|---|
| <input type="checkbox"/> Built environment | <input checked="" type="checkbox"/> Location of premises and services |
| <input checked="" type="checkbox"/> Information and communication | <input checked="" type="checkbox"/> Customer care |
| <input checked="" type="checkbox"/> Timing | <input checked="" type="checkbox"/> Stereotypes and assumptions |
| <input checked="" type="checkbox"/> Cost | <input checked="" type="checkbox"/> Consultation and involvement |
| <input type="checkbox"/> specific barriers to the strategy, policy, services or function | |

Please specify

With impending legislative changes in the forthcoming Children and Families Bill, children and young people with additional needs may receive a personal budget, or transport may later become a mandatory service to be provided by the council. In order to take full account of the bill a transition period has been recommended for the current SEN provision in Leeds. Subject to Executive Board approval this will be developed in more detail with a formal proposal, including detail, returned to Executive Board for approval within 3 months. The consultation findings will still be current and so will inform the final recommendations.

8. Positive and negative impact

Think about what you are assessing (scope), the fact finding information, the potential positive and negative impact on equality characteristics, stakeholders and the effect of the barriers

8a. Positive impact:

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

- An increase in Independent Travel Training (ITT) will encourage independence, promote self-advocacy and build confidence and self-esteem. An increase in students travelling independently could generate some savings. However it is acknowledged that ITT is not a possibility for some students with SEN.
- If the recommendation to phase in personalised budgets/charges is approved, the transition period will enable parents to adjust to the terms of the new policy and enable them to budget accordingly.
- There would be long term savings for the Council allowing for funding to meet targets and the ability to maintain essential services. This would create an opportunity to retarget resources to those most in need by replacing blanket provision with an assessed consideration of individual needs.
- The consultation process has raised awareness of the costs of transport to the wider public.
- The process has also stimulated new and innovative ideas for a broader range of services which could be provided to meet individual needs.
- There has been an increase in partnership working and an appreciation of the full costs of providing this support.

Action required: None

8b. Negative impact:

The consultation executive summary (appendix 5) provides additional detail of the potential negative impacts and any mitigation. Some of these are highlighted in the summary below. Any changes to the current transport policy for post 16 SEN transport could potentially result in the following negative consequences, which need to be considered:

Negative impact on families

- Transport for SEN students can be very high in cost depending on the complexity in needs of the young person.
- There could be potential logistical pressures for families having to balance drop off and

pick up times with home life, work patterns, childcare, children at different schools and other practical issues.

- Dependant on their additional need, some young people need routine and familiarity. This may be uncertain if the policy changes.
- Some families may be influenced in their choice of school/provision for financial reasons.
- Families may feel they need to choose provision nearer to home rather than provision which is most appropriate for their child's specialised needs.
- The young person may not be able to further their education if they cannot afford transport.

Negative impact on schools/colleges

- If this discretionary element is withdrawn, fewer students with SEN may choose to attend further education. This could affect the viability of the provision and courses.
- Attendance and Children Not in Education, Employment or Training (NEET) – may be impacted upon if young people with SEN no longer have access to free transport.
- The demography could change if schools/provisions are only attended by those who can afford transport costs.
- Safety concerns at specific sites may be raised due to increased traffic at drop off and pick up times.

Negative impact on the council

- There could be a reputational impact if changes to the transport policy were 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 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 transport appeals.

Action required:

If the review results in changes to the current transport policy for post 16 SEN, as recommended, the actions below may help to mitigate the negative impacts. They are also reflected on in more detail in appendix 5:

Negative impact on families

- A well thought out and planned communication strategy will be needed so any changes to the policy are clearly explained in a timely and accessible way.
- Families will need to be given prior notice before transport provision is amended to help mitigate the impact.
- Information explaining the eligibility criteria for free transport will need to be available and families will have to be given plenty of time to apply.
- The service lead officers will continue to establish whether schools and colleges could fund transport through bursaries for individual cases.
- Transport contracted to provide a service will continue to be available for families; therefore parents will not have to transport their own children and this will mitigate any logistical home-life pressures.
- An appeal process, compliant with DfE guidelines will be retained, which includes the option to award discretionary provision based on the grounds of exceptional

hardship.

Negative impact on schools/colleges

- Monitor the impact any policy changes have on NEET and attendance.
- Transport contracted to provide a service 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.

Negative impact on the council

- Some press coverage has already taken place during the consultation. A planned strategy is in place to effectively communicate the decisions made by Executive Board.
- On-going work with Metro to improve the offer of child friendly transport including driver training and concessionary fares.
- Transport contracted to provide a service will continue to be available therefore parents will not have to transport their own children so an increase in traffic and congestion will be minimised.

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

Yes

No

Please provide detail: Not applicable

Action required: None

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

Yes

No

Please provide detail:

An increase of young people with SEN using public transport through ITT will result in this group being more visible in the community.

Action required: None

11. Could this activity be perceived as benefiting one group at the expense of another?

Yes

No

Please provide detail:

Action required: None

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>City wide consultation (Full consultation plan available) Online survey (adult and CYP version) Promotion of consultation through ebulletins etc Consultation meetings by request Workshops with CYP OBA Workshop</p>	<p>27th February -27th March EXTENDED to 24th April</p>	<p>Full Analysis on feedback to assess potential impact.</p>	<p>Gerry Hudson</p>
<p>The communication strategy includes a round of communication to notify people of the decisions made by exec board.</p>	<p>After July exec board. Likely to take place through August 2013</p>	<p>All young people with SEN and their families would be aware of any approved changes.</p>	<p>Gerry Hudson</p>
<p>Continue to invest and develop Independent Travel Training where appropriate</p>	<p>Ongoing work. Full strategy planned for roll out. Team to be doubled in the future.</p>	<p>An increase in the numbers of students travelling independently.</p>	<p>Allan Hudson</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	8 th July 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

If relates to a Key Decision – **date sent to Corporate Governance**

8th July 2013

Any other decision – **date sent to Equality Team (equalityteam@leeds.gov.uk)**