

Appendix 4b

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	

<p>1. Title: The redevelopment of the Children's Services transport policy and strategy</p> <ul style="list-style-type: none"> • Children who choose to attend a school on the basis of faith • Post 16 transport to mainstream schools and colleges • Free travel to a school that is not the nearest appropriate school
<p>Is this a:</p> <p> <input checked="" type="checkbox"/> Strategy /Policy <input checked="" type="checkbox"/> Service / Function <input type="checkbox"/> Other </p> <p>If other, please specify</p>

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	Specialist

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 affect eligibility to statutory transport, although a range of new ways of working are 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 of these 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 of these current discretionary elements there are potential savings of up to **£4.91m**. Of this amount faith school transport amounts to **£0.8m**, Post 16 mainstream transport **£1.36m** and travel to not the nearest school **£0.15m**. The remainder is transport provided for post 16 SEN travel which 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.

It has been decided to complete a separate equality, diversity, cohesion and integration (EDCI) impact assessment for discretionary transport for post 16 (up to age 25) home to school/college transport for young people with special educational needs (SEN). 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 needs 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	<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: 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.	

5. Fact finding – what do we already know 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. (priority should be given to equality, diversity, cohesion and integration related information)
Current Home to School/College Transport Policy 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 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 that follows provides details of the discretionary transport services that have been reviewed.

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
Free travel to a school that is not the nearest appropriate school	150k	181

Children who choose to attend a school on the basis of faith

- The law only requires Leeds City Council to have regard to parents' preferences for a faith-based education but only to fund transport to faith schools for families on qualifying low income
- 55 children are currently in receipt of free travel to Catholic Primary schools; the remainder attend the four Catholic High schools and one Church of England school in Leeds
- Some of these attend six different church schools outside the Leeds boundary as it is their nearest faith school
- Most of our neighbouring local authorities no longer fund transport to faith schools on a discretionary basis

Post 16 transport to mainstream schools and colleges

- The law does not require Leeds City Council to meet the cost of home to school/college transport for young people over the age of 16
- We currently provide this for those who attend the nearest school or college that offers the course combination they have chosen to follow (where that is more than three miles away)
- Most of our neighbouring local authorities do not make free transport available to their families for this group of young people

Free travel to a school that is not the nearest appropriate school

- Sometimes we are unable to provide a place at a school within 3 miles of the child's home address
- In these circumstances the present policy allows free travel to a school of the parent's choice rather than the nearest appropriate school with an available place, provided it is within a reasonable distance
- If the policy was changed the children would still qualify for free transport, but only if they were attending their nearest school and it was more than 3 miles away
- The majority of children currently affected live in Bramhope, who choose Otley Prince Henry's, and children living in North East Leeds, who choose to go to Tadcaster
- If this was ended a child would not qualify for free transport unless they were attending their nearest school and it was more than 3 miles away.

Geographical information

If any changes were made to the current transport policy it would involve children and young people and their families from across the whole city. Some discretionary elements of the policy do however have geographical implications.

With regards to faith education, those children attending faith schools come from wider and more distant geographical areas. There are fewer faith schools in the city therefore an

element of travel is often necessary in order to receive a faith-based education.

Financial impact

If the discretionary funding is removed or amended then those children from low income families will still continue to get free transport through the statutory element within the Transport Policy. For 2012 to 2013, ten zero fare passes were funded for primary-aged children and approximately 420 for secondary aged children solely on the basis of extended rights for low income families.

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 except the option of 'no change'.

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:

None

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? The following table shows 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 consultations meetings gave an opportunity for people to voice their comments or concerns as an alternative to completing the survey. Submissions of the survey were also encouraged as a group so that people did not have to respond just as an individual. Some groups (a faith based group) took the opportunity to run their own petition and submitted it as part of their contribution to the consultation. The findings were taken into account as part of the overall analysis.

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

Age

Carers

Disability

Gender reassignment

Race

Religion or Belief

Sex (male or female)

Sexual orientation

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:

Any changes to the policy may affect families that don't fall into the statutory element which provides transport for those families on low income. This offer will remain unchanged.

Stakeholders

Services users

Employees

Trade Unions

Partners

Members

Suppliers

Other please specify

Potential barriers.

Built environment

Location of premises and services

Information and communication

Customer care

Timing

Stereotypes and assumptions

Cost

Consultation and involvement

specific barriers to the strategy, policy, services or function

Please specify

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.

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:

- If a decision is made to make changes to the policy, low income families would still continue to have an extended right to free transport as proscribed in the Education and Inspection Act (2006).
- If the recommendation to phase out the provision of discretionary elements over 2 years is approved, rather than an immediate withdrawal from Sept 2013, it will give sufficient time for parents to adjust to the new policy and 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 need.
- An increase in Independent Travel Training will encourage independence, promote self-advocacy and build confidence and self-esteem for young people with SEN. (SEN transport is addressed in a separate EDCI impact assessment).
- 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:

Promote the eligibility criteria for low income families using a range of methods that will make the information accessible to all families

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 summary below. Any changes to the current transport policy in respect of current discretionary provision could potentially result in the following negative consequences, which need to be considered:

Negative impact on families

- If free transport is no longer provided it is possible that middle income families would be more likely to be impacted on financially.
- 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.
- There could be potential safeguarding issues for children walking or travelling on more than one bus in order to get to school or college.
- If transport was no longer free 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 educational 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 free 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 free travel.
- Safety concerns at specific sites may be raised due to increased traffic at drop-off and pick-up times.
- There is a concern that attainment may be affected if the review results in children having to use normal service public transport only and are therefore making longer journeys at both ends of the day.

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 transport appeals.

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. 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.
- Dedicated bus services will continue to be available for families; therefore parents would 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

- Teams working on the Basic Need strategy will need to be informed of any changes to the policy which may create an additional pressure on places if families opt to use more local schools.
- Monitor the impact any policy changes have on NEET and attendance.
- 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 and

journeys will largely remain the same.

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. Metro to continue route planning and analysis of capacity on school service buses to ensure greater efficiencies and savings.
- 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.

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:

The diversity make up of local schools may change

Action required:

This could be evidenced by monitoring within schools/colleges to assess any changes to demographics over time.

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

Yes

No

Please provide detail:

With the current transport policy as it stands, some families are seen as benefitting over others.

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 children, young people and their families would be made aware of any approved changes.</p>	<p>Gerry Hudson</p>
<p>Continue to build on the Diocesan partnership. Explore whether any financial support can be provided if there is a change to the policy.</p>	<p>On-going partnership work through scheduled meetings etc.</p>	<p>Positive working partnerships with a shared outcome. Establish whether any financial assistance could be provided to students most in need.</p>	<p>Paul Brennan & Gerry Hudson</p>
<p>Continue to build on School</p>	<p>On-going partnership work</p>	<p>Positive working partnerships</p>	<p>Paul Brennan & Gerry Hudson</p>

Action	Timescale	Measure	Lead person
<p>and college partnerships.</p> <p>Explore whether any funding can be made available through school's budgets or College Bursaries if there is a change to the policy</p>	<p>through scheduled meetings etc.</p>	<p>with a shared outcome.</p> <p>Establish whether any financial assistance could be provided to students most in need.</p>	
<p>Continue close working with Metro around any future proposals.</p> <p>Promote child friendly public transport, concessionary fares, Driver training etc</p>	<p>On-going partnership work through scheduled meetings etc.</p>	<p>Positive working partnerships with a shared outcome.</p>	<p>Gerry Hudson & Allan Hudson</p>
<p>If changes are made to the transport policy the impact could be monitored on the following areas:</p> <ul style="list-style-type: none"> • Increase in NEET, attainment and poor attendance • Increase in instances of bullying due to religion or belief • Increase in demand for more local schools creating greater pressure around Basic Need 	<p>On going work over a number of years with relevant partners.</p>	<p>Monitor relevant data looking for any trending which could be attributed to changes to the transport policy.</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)**