

Equality impact assessment form

Directorate	People Services
Service area	School Organisation and Provision
Proposal	Instead of the Council arranging taxis and minibuses or paying fuel reimbursements, the Council propose to replace them with Personal Travel Budget payments for all eligible sixth form learners. The proposal will be supported by a new and enriched Independent Travel Training (ITT) service to help and support more young people become independent travellers.
Reason for proposal	To consider proposals within the MTFP and to support and promote young people's independence and transition into adulthood
Sign off (Director/Head of Service)	Gurmail Nizzer
Date of assessment	8/9/22 – 17/1/23

Please read the support notes to help you in Appendix 1 before completing your assessment

The form

You need to attach the completed form to any report to help councillors and colleagues make their decisions by taking equality implications into account.

The assessment team or name of individual completing this form

Team leader's name and job title – Dawn Barlow Post 16-19 Home to School Travel Assistance Project Manager

Other team members if appropriate

Name	Job title	Organisation	Area of expertise
Gurmail Nizzer	Director of Children's Integrated Commissioning	Derby City Council	Integrated Commissioning
Diane Whitehead	Head of School Organisation and Provision	Derby City Council	School, Organisation and Planning
Alix Manning-Jones	Opportunity Area Programme Manager: Derby	Derby City Council	Engagement and participation
Adele Styles	Participation Officer - CYP	Derby City Council	Engagement and participation
Ann Webster	Lead on Equality and Diversity	Derby City Council	Equality and Diversity
Madhuri Gembeli	Solicitor	Derby City Council	Legislation

Name	Job title	Organisation	Area of expertise
Alison Bush	Principal Solicitor	Derby City Council	Legislation
Mark Wyld	Principal Accountant	Derby City Council	Finance
Janet Bowlzer	Group Accountant	Derby City Council	Finance
Tom Hay	Commissioning Manager, Home to School Transport	Derby City Council	Home to School travel assistance
Janine Ashwell	Head of Service Transition 2	Derby City Council	Special Education Needs and Disabilities
Shelley Harrod	Policy and Consultation Manager	Derby City Council	Policy and consultation

Step 1- setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side- tracked.

1. What are the main aims, objectives and purpose of the decision you want to make?	<p>The Equalities Impact Assessment (EIA) was completed in response to a proposal that sits within the Councils Medium Term Financial Plan. The plan from 2022/23 to 2024/25 details how the Council needs to make £16.5m of savings over the next three years and also identifies that there are additional budget pressures of £26.7m forecast for the same period. This means making difficult decisions about services in all areas of the Council's work.</p> <p>Other local authorities' home to school travel assistance policy statements and arrangements were researched. This research helped to inform the development of the proposal on Personal Travel Budget's (PTB). The proposed changes align with approaches taken by other local authorities.</p> <p>The proposal could have an impact on individuals with protected characteristics. As a result, this EIA was necessary to understand any potential differential impact prior to any formal decision to approve the proposal and change in policy. In the case where any potential negative differential impact has been identified and may possibly arise from implementation of the proposed proposal suggested necessary mitigations the Council may need to consider have been included as part of the EIA. Applying an approach that is based on eligibility and ability brings with it the opportunity to advance equality of opportunity in a way that does not impose a 'one size fits all' approach to a protected characteristic group, but which focuses on ensuring that young people are treated in accordance with their individual circumstances (which are such that assistance is required and of a high value and not solely by virtue of a particular protected characteristic).</p> <p>The proposal which went out to an 11 week public consultation was:</p> <ul style="list-style-type: none"> • Instead of the Council arranging taxis and minibuses or paying fuel reimbursements, the Council propose to replace them with a PTB
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	<p>payments for all eligible sixth form learners. The proposal will be supported by a new and enriched Independent Travel Training (ITT) service to help and support more young people become independent travellers.</p> <p>It should be noted that travel assistance provided by taxi or minibus would only be considered in exceptional circumstances. For example, an eligible sixth former who has complex medical needs that require trained staff to accompany them to school or college, where there is a need for medical intervention during the journeys to and from school or college e.g.,</p> <ul style="list-style-type: none">○ A young person requiring oxygen○ A young person requiring suction <p>PTBs would be based on distance from home to school. PTBs would be paid termly directly into a bank account chosen by the student/parent.</p> <p>Benefits of PTBs include:</p> <ul style="list-style-type: none">• freedom and flexibility to make travel arrangements that best meet a family's needs and circumstances• using the money to help the young person become more independent• giving family's choice and control over how funding to support their child's travel assistance needs is spent• opportunities to share with other parents and potentially increase buying power for arranging travel assistance <p>If proposals are accepted by Council Cabinet, the new policy would come into effect in September 2023 and apply to all new and existing eligible sixth form students.</p> <p>The Council's ambition is for everyone to use sustainable active forms of travel from home to school or college such as walking or cycling. This supports the environment, promotes health, well-being and develops essential preparation for adulthood skills. We're walking or cycling are not appropriate options, the Council believes that most eligible young people with SEND will be able to travel for free on public transport. The Post 16-19 Home to School Project Manager has completed the Climate Impact Assessment. Please see appendix 1 of the Cabinet report.</p> <p>The proposed change and the offer of an enriched ITT programme supports many key aspects of Council Delivery Plan 2022-23 (derby.gov.uk)</p> <ul style="list-style-type: none">• A city of growth• Learning city with access to skills and knowledge for all ages
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	<ul style="list-style-type: none"> • A vibrant city • A resilient city • Empowered, strong and independent communities <p>The impact of the Covid-19 pandemic on young people and their experience has led to concerns around the development of independence and functional skills to support their journey into adulthood. Evidence reflects the need to support young people to develop the necessary skills to support their health and well-being https://www.oecd.org/coronavirus/policy-responses/youth-and-covid-19-response-recovery-and-resilience-c40e61c6/</p>
<p>2. Why do you need to make this decision?</p>	<p>Over the past few years, national policies have re-focused, aimed at supporting and enabling individuals, families and communities to be independent and resilient. The proposal aligns itself with other services and initiatives that will be offered to young people to support the development of independence skills and the ability to travel without fear. For some young people and their families, the personal gains of being able to access a high-quality independent travel training service will potentially be enormous. For example, supporting young people into adulthood, so that they can take part in work and social opportunities more easily.</p> <p>Derby City Council does not have a statutory duty to provide home to school/college transport for eligible sixth formers in the same way as it does for compulsory school aged children. Sixth formers are those defined as all 16-19 years old learners including 19-25 learners with an Education Health and Care Plan (EHCP) who started the course before their 19th birthday (sixth form learners). Our aspiration is to undertake this duty in the most enabling way possible for children and families to ensure they are safely supported to independence.</p> <p>Local Authorities do not have to provide free (or subsidised) Post-16 travel assistance. They do have a duty to prepare and publish an annual transport policy statement specifying the support that the Council considers necessary to facilitate the attendance of Post-16 learners receiving education or training. This policy statement is written in accordance with section 509 of the Education Act 1996. The policy statement also includes relevant young adult learners (19+) with an Education, Health and Care Plan (EHCP).</p> <p>It should be noted that it remains the parents' responsibility to ensure that their child attends school or college regularly.</p>

Other Local Authorities are increasingly encouraging young people and their families to utilise a range of resources to aid travel to and from school and or college. This will vary dependent on circumstances. For example, a learner/learner's family may already be in receipt of some or of the following:

- Any level of Universal Credit
- The 16 – 19 bursary which can support travel
- Enhance Mobility Component of the Disability Living Allowance
- Maximum level of working tax credit

Over recent years there has been a 27% increase in the number of pupils eligible for travel assistance. The Council's overall home to school travel assistance expenditure for 2021-22 financial year was £5.5m and is forecast to increase by another £2.5m to £8.0m by the end of March 2023 due to rapidly rising demand in eligible travel assistance applications, together with increasing costs from transport operators.

It is important to note when assessing the equality Impact, that not all young people with SEND will require travel assistance. However, when assessing potential equality Impact, it is useful for Members to review the Derby SEND population, to better understand the likely size of the local population that could be particularly affected by any proposed changes to Post 16-19 Travel Assistance offer.

The overall numbers of children and young people aged 5-25 eligible for home to school travel assistance is forecast to increase over the next two years. This means that home to school travel assistance costs could also continue to increase.

The Council (December 2022) provides home to school travel assistance for 193 eligible sixth formers. This mainly consists of providing single occupancy, or shared taxis. This is at a cost to the Council of £1.474.60m. The Council provides a mileage allowance for 27 families at a cost of £59,961 and 22 bus passes have been issued for this academic year with a cost to the Council of £10,870. Please note the Council continues to receive applications for home to school travel assistance. It is believed that travel assistance in single occupancy or shared taxis could be a barrier for some young people who may otherwise be able to access a wide range of opportunities available to support them on their journey into adulthood, employment and beyond.

193 eligible sixth formers currently in receipt of home to school transport of which:
106 attend Further Education colleges
86 attend Special Schools

1 attends mainstream provision

Overall, 1229 children with Special Educational Needs and Disabilities (SEND) are currently eligible for and receive home to school travel assistance.

1049 currently receive a seat in a taxi or minibus.

180 receive a mileage allowance

In addition to the figures above, the Council provides 149 bus passes to eligible pre-16-year-old learners

52 Arriva

97 Trent Barton

It is important to note that this does not mean 149 children currently receive a bus pass as some children receive both a Trent Barton and Arriva pass due to the bus route between home and school.

SEND Assessment requests have risen.

It is relevant to note that in terms of any forecast demand pressures, the potential for increased demand relating to SEND Travel Assistance is by far the most significant driver.

The most recently available SEND data shows that there are over 3282 children and young people with Education Health and Care Plans, 2757 are pre 16 and 515 post 16.

Evidence based research was undertaken to ensure that the proposal, consultation, and recommendation to Council Cabinet are robust, have considered and reflect current thinking.

This link helps to explain some of the things we've noticed in the young people's engagement sessions of the consultation, where young people are demonstrating much greater capacity to 'lean into risk', which is important to listen to if we are to support them in line with their own developing brains

<https://developingadolescent.semel.ucla.edu/topics/item/science-of-risk-taking#:~:text=Rational%20Risks,that%20help%20support%20decision%20making>

The work of Dan Siegel on interpersonal neurobiology and the 'essence' of adolescence (**e**motional **s**park, **s**ocial **e**ngagement, **n**ovelty, **c**reative **e**xploration) is

	<p>the most significantly influential work on neuroplasticity and brain development between childhood and adulthood to date. He has written many papers, academically and across the general market, supporting society to better understand the power and purpose of the adolescent brain, so that we can work with brain development rather than against it at this crucial stage of development. The importance of allowing young people to take risks and make mistakes is an essential part of this process. 'Brainstorm' https://drdansiegel.com/book/brainstorm/ and 'The Power of Showing Up' https://drdansiegel.com/book/the-power-of-showing-up/ are key evidence promoting effective adolescent wellbeing, mental health and parenting.</p> <p>Ofsted's report revealed that there had been significant and cumulative effects of the disruption caused by the pandemic on the health, learning and development of children with SEND. The report states that all educational settings should be ambitious for every child and young person with SEND, making recommendations that include: more accessible universal services for children and their families, delivered by practitioners with a strong understanding of how to meet the needs of the children and young with people with SEND; more accurate identification when children need targeted or specialist support; higher aspirations for children and young people with SEND; a greater sense of joint responsibility between partners in a local area [...] and greater coordination of local services so children get the right support at the right time. https://www.gov.uk/government/news/children-and-young-people-with-send-disproportionately-affected-by-pandemic</p>
<p>3. Who delivers/will deliver the changed service/policy including any consultation on it and any outside organisations who deliver under procurement arrangements?</p>	<p>The proposed change to the service provision was subject to a robust 11 week consultation with stakeholders. The stakeholder representation was engaged with during the design process and as part of the consultation itself.</p> <p>A project and communication plan with timescales for activities was developed. Teams responsible for delivery of the consultation and change of delivery service:</p> <ul style="list-style-type: none"> • Integrated Commissioning Department, People Directorate, Home to School Travel Section • Performance and commissioning service • Policy, Insight and Communications Service • Legal, Procurement and Democratic Services • Corporate Resources • EHCP team <p>Service areas will need to incorporate additional processes into their 'business as usual' activities to accommodate the necessary functions required to administer Post 16 travel assistance for eligible sixth form learners. A dedicated project plan</p>

regarding the implementation of PTB's has been developed so that a robust process incorporating all key operational functions will be in place by the end of April 2023. These functions include the administration and payment of PTB's.

Any changes to the travel assistance offered to eligible sixth formers will not be implemented until September 2023. This was to allow sufficient time to engage with key stakeholders and to give those directly affected time to consider and plan their travel arrangements for the academic year 2023/24.

Public Consultation with key stakeholders, young people, parents and carers was undertaken between September and December 2022 to consider the potential impacts of the new proposed Post 16-19 Travel Assistance offer, prior to submission to elected Members for approval in order to mitigate negative differential impacts.

Public consultation events were widely published on social media and within local media and community groups. The public events were held at 10 -11:30am, 12:30-2pm and 6:30pm-8pm to allow those with childcare and working arrangements to opportunity to attend and engage at times which are more convenient Consultation and specific questions relating to proposals, were made available through the Let's Talk Derby the Council's consultation website. Notification of the consultation, with links to the consultation draft and consultation questions, were sent to current service users, promoted through Schools and Education networks, the Parent Carers Together, Youth Alliance, SEND Ambassadors, CYP Scrutiny, SEND Co-production and Delivery Group and SALS network.

Ahead of the launch, schools and current service users were notified of the consultation, given appropriate links to the consultation page, and notice of the closing dates. Officers also raised awareness of the consultation through the school circular and flagged the consultation in meetings with key stakeholders in the build up to the consultation. Despite extensive communications, the level of interest in the public evets with less than 10 people attending an event.

The consultation was promoted through the Council's social media platforms, professional networks including schools, the Parent Carer Together and the Local Offer website. The Council directly contacted service users and sent reminder communications throughout the consultation period.

Key Stakeholders

- Children and Young People

	<ul style="list-style-type: none"> • Families and carers • Schools and colleges • SEND Ambassadors • Deaf and hearing-impaired community • Voluntary Sector organisations • Youth Alliance • SENCO Network (SALS) • SENDIASS • Equalities Network • Local SEND Co-production and Delivery Group
4. Who are the main customers, users, partners, colleagues or groups affected by this decision?	<p>Main customers</p> <ul style="list-style-type: none"> • Eligible sixth formers and their families • Schools, colleges, and training organisations • Home to school travel assistance service • Transport operators • Corporate resources • Finance • EHCP team • Legal

Step 2 – collecting information and assessing impact

5. Who have you consulted and engaged with so far about this change, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.	<p>The consultation was conducted using a best practice approach and methods. The consultation process was rigorous. The communications plan that supported the consultation was extensive, robust and effective at raising awareness. The consultation was promoted widely, both to universal audiences and through targeting to specific, key audiences' groups and stakeholders. It followed the Gunning principles.</p> <p>Prior to the consultation going live the project team</p> <ul style="list-style-type: none"> • Undertook a significant amount of research, data gathering, benchmarking and modelling of Post 16-19 home to school travel assistance offers within other local authorities. • Sought considerable internal legal advice regarding the proposal and ongoing engagement from legal colleagues who continue to provide advice regarding the Education Act, the Equality Act and or any other legal implications.
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	<ul style="list-style-type: none"> • Shared the proposal with the SEND Delivery Co-production Group to shape the consultation document and consultation activities. • Undertook a sense check with young people attending Transition 2 to ensure the consultation document and questionnaire were accessible to young people. • Spoke with a number of SENDCO's, teaching professionals and voluntary sector organisations to ensure the documents and proposed engagement activities would be suitable. • Planned 3 public events and booked an interpreter where possible for all events to ensure inclusivity. • Ensured the venue for all public events were accessible. • Planned 13 participation events with schools/colleges and voluntary organisations specifically for young people who may be directly affected by the proposals. This enabled us to listen and hear about their experiences of travel to school and college, their aspirations for independence and integration and what they think will help support them to arrive safely, on time and ready to learn. • Developed and provided an Easy Read version (see appendix 4) of the consultation and questionnaire. Which was available to young people, their families and stakeholders from the launch of the consultation on Let's Talk Derby. A Communication Print PowerPoint was developed for the engagement events with young people. Paper copies of the Easy Read version were shared at the young people engagement events. • Provided a contact telephone number for people to call and request a paper copy of the consultation document and or a copy in an alternative language. • Ensured engagement events with young people will be held where possible in the school/college or group they currently attend with their individual support and communications needs will be met by familiar adults from within the host organisation. • Spoke to and considered the views of a small number of Head teachers to gather feedback on the best way forward with the consultation. • Included the consultation on the Lets Talk Derby pages of the Council's website.
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- Ensured an easy read version was made available to all online and a paper copy is available upon request. The easy read version will be available as part of the public open engagement activities planned for October and November 2022.
- Questions were asked in the consultation document around Independent Travel, in order to better understand the opportunities, barriers and support required to enable children and young people to be as independent as possible, and travel independently to their place of learning where it is possible for them to do so.
- Supports sustainable travel
- Supports and promotes independence
- Offers a range of travel solutions to support choice and flexibility for families

The Council acknowledges issues related to the provision of a BSL version of the consultation document. The Council explored a number of ways to provide a BSL version. However, due to production timescales and high costs a decision was made that at the time it was not a viable option. The Council worked with its partners at Allestree Woodlands School to provide a fully subtitled presentation alongside a BSL interpreter. The Council encouraged stakeholders to raise awareness of the additional public event. The Project Manager will ensure that the cost and timescales linked to production of a BSL version are noted as part of the consultation evaluation and escalated as needed.

The survey data has been analysed by the Council's Policy, Insight and Communications Service alongside the Post 16-19 Project Manager. The communication activities achieved a good reach into the intended audience groups, for example over 700 clicks through to the consultation page were generated as a result of the communication campaign. However, this public awareness was not converted into a high number of consultation responses.

96 responses and 1 organisational response were received via the online public consultation on the Council's website and or to the Let's Talk Derby email between 30 September and 12 December 2022.

3 responses were received via the Youth Alliance. These were not submitted through the Let's Talk Derby website. However, the responses will be considered alongside all other respondents.

All responses received were examined carefully and used to help identify the key mitigations identified within the EIA, to shape the revised Post 16-19 travel assistance policy statement and the development of the enriched ITT offer.

The 96 responses, 1 organisational and 3 responses from the Youth Alliance should be viewed in the context of the size of the key audience affected by the main changes proposed – parents/carers of Post 16 SEND learners eligible for travel assistance. Therefore, as a percentage of key audience size, a lower response level is to be expected and becomes a more sizeable proportion of the overall key audience group. A full respondent profile can be found at appendix 2

In the open comments section of the online consultation document several respondents provided a narrative about their own personal circumstances related to home to school travel assistance.

Common themes identified from the public consultation are documented in section 6. However, there are two key point to draw out from the public consultation:

1. Although, it is clearly documented in the consultation document, there is a lack of understanding as to what defines a sixth former learner.
2. What would the Council determine as exceptional circumstances for travel assistance by taxi or minibus

To clarify this issue the Council, in line with the DfE's Statutory Guidance for Home to School Transport the Council does not consider the following to be exceptional circumstances:-

- The parent of an eligible child is employed and needs to get to work (this includes parents who work from home).
- The parent of an eligible child has another child(ren) who need(s) to get to a different school(s).
- The decision to provide free travel assistance cannot be

made to fit in with parents' other social, family, or caring commitments.

- The home to school travel assistance offer will be ITT, a bus pass, or a mileage allowance for all eligible children, for whom there are no exceptional circumstances.

Any decision regarding exceptional circumstances would be based through discussions with the young person, their families and the professionals who know the learner best. The Council will consider travel assistance applications on a case-by-case basis based on each young person's specific individual needs and circumstances.

We held engagement sessions with young people regarding the Post 16-19 home to school travel proposal, and our gratitude to the following schools, colleges and voluntary groups for this engagement.

- Allestree Woodlands
- Transition 2
- Horizons
- Lees Brook
- St Andrews
- St Martins
- St Clares
- Derby College Broomfield Campus
- Umbrella
- Kingsmead
- Bemrose

In total the expert facilitator team engaged with 72 young people aged 14 years to 20-year-olds. The views expressed by young people during the sessions were mixed, spanning the full spectrum of opinion.

Young people with SEND were very vocal about the importance of supporting them to be independent in getting out and about in Derby and beyond. They strongly expressed the view that independence should lie at the core of any travel assistance policy and all who had accessed independent travel

training talked openly about their experiences which included both positive and negative views.

They made suggestions for ways that young people with SEND could continue to be supported and grow in confidence as they use public transport as well. For the older young people, this has enabled them to access work-related training and work experience and have more say about their social lives.

When the young people were discussing how they might travel to their educational setting in the future, if one of the Post 16 SEND travel assistance options of using a PTB was introduced, most learners welcomed that choice. However, some young people felt that a PTB could be difficult for some families to manage or to organise travel such as a taxi.

At all engagement events an overview of the proposal was provided. 3 core questions were shared and discussed. Young people were able to write and add their own post it notes to flipcharts. Or a facilitator recorded what was said so that discussions were not interrupted.

At all events copies of the consultation document, questionnaire and easy read version were left with pre-paid envelopes for return and or the Project Manager offered to collect completed copies if needed.

The Council received 31 responses to the easy read version. 29 of the respondents said in the profile data collected that they had a disability.

The open comments submitted from these respondents echoed the views and opinions shared within the young people engagement events.

'I want to travel on my own because It helps with our future so In the future we could live on our own without someone's help.'

'My Ideas was to: have the someone to make sure safe and to not to speak to strangers in the bus. it is to dangerous to do that'

'I like the idea of independent travel'

It should be noted that the Council has received and welcomed feedback about the consultation from stakeholders.

One organisational response stated, 'The Alliance requests the local authority cease the current consultation as held above due to the complexities and ambiguity of the situation, resolving to move forward working more closely using a collaborative approach, as in the Children and Families Act 2014.

The Alliance would like to bring to the attention of the local authority that they are aware of some providers having shared their voice in this consultation, but regrettably, the local authority has failed to communicate with a cohort of families that perhaps better represent the current peer group about to embark on their journey through Post 16 placements.'

A representative from a voluntary sector group, in a public meeting stated, 'I wanted to share how comprehensive I feel the consultation has been. I feel it should be celebrated as a way of moving forward with future consultations. The consultation has not been done as a blanket offer and has tried to gather the feedback from parents and young people. We have promoted the public events and offered to support parents to attend. One of the key things that stands out in the feedback from young people is their wish to extend their social lives outside of school. Well done so far in what you have done.'

Another voluntary sector representative said, 'Parents were happy to give their own honest feedback. DB has done a great job and parents recognised how supportive she was.'

On an email from a teaching professional, 'Thank you for your response, its very positive and pleasing. I enjoyed the session and you both made the session brilliant for the students. They were able to express themselves really well because of how you both came across to them. I have some more surveys

and will drop them off tomorrow. I hope our students can be involved in other future consultations. Many thanks for coming so appreciated.'

6. Using the skills and knowledge in your assessment team or what you know yourself, and from any consultation you have done, what do you already know about the equality impact of the proposed change on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. Only fill in the mitigation box if you think the decision will have a negative impact and then you'll need to explain how you are going to lessen the impact.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Age – older and younger people	<p>Eligible sixth formers 16 – 19 young people – yes</p> <p>The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of age.</p> <p>The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance.</p>	<p>This proposal has the potential to expand opportunities for young people 16-19 to travel independently, to engage in employment, social activities and access supportive services to lead to greater inclusivity across the City.</p> <p>Provision of an effective enriched Independent Travel Training Service for</p>	<p>During the discussions about the negative impacts these proposed policy changes may have, mitigations have been considered and will be put in place to ensure that appropriate transport is provided to the most vulnerable young people with specific medical or SEND needs. It is also acknowledged that some families of</p>	<p>The key themes raised during the public consultation were:</p> <ul style="list-style-type: none"> • Definition of exceptional circumstances • Attendance at education maybe put at risk • Young people's awareness of personal safety • ITT will provide great opportunities for some young people • The amount proposed will not cover the cost. • Increased stress to families and young people. • Other commitments would prevent 'parents' from transporting young people. • Provide greater flexibility to make our own arrangements

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
		<p>young people who are ready to use public transport and cease reliance on taxis, which brings longer term benefits relating to independence in their adult lives.</p> <p>Young people aged 16 to 19 years old who attend Further Education or a mainstream school will have a range of options available. They will be attending college/school with other young people and this age group are likely to be socialising in more independent ways and exploring ways to be more</p>	<p>children with SEND will be expected to take greater responsibility for the cost and provision of transport for their child, and this may have a negative impact in some cases.</p>	<p>The key themes raised during the young people engagement events were:</p> <ul style="list-style-type: none"> • Travel training • Safety when travelling on public transport, walking or cycling to school or college – knowing how to stay safe and how to deal with certain situations that may occur. Young people provided examples of what they could do • Accessible information – this included information about how to use a timetable to know what times buses are, how to get around the City, knowing what was in the local area • Gold card issues – a high number of the young people had a Gold card but this did not meet the need to get to school or college before 9:30am • Support to and from parents – A high number of young people shared their hopes that their parents and families would support them to travel more independently. This was a very emotive area for young people who said they wanted their parents to have more confidence

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
		<p>independent in day to day life.</p> <p>The proposals will have a positive impact by providing increased opportunities to travel with peers and develop life skills to help support independence. As set out in the proposals above, this will include a range of travel assistance options and ITT to support transition.</p> <p>In exceptional circumstances a taxi place or council bus place may still be offered.</p>		<p>in their abilities and to allow them to try even if they made mistakes.</p> <p>Key Mitigations identified Independent Travel training This is not a blanket policy/requirement of the Post 16-19 policy statement. The enriched service is an option featured in the refreshed Post 16-19 Travel Assistance Policy that may benefit children and young people. It is reasonable to ask parents/carers and young people to consider independent travel training. It should be based on individual assessment and tailored to the young person's needs. It is recognised that there may be some young people who may never manage independent or supported travel by public transport.</p> <p>Communications strategy To ensure that accessible information is available to families, young people and stakeholders to inform them of the changes to the Post 16-19 travel assistance offer. The Council will communicate with all young people and their families to outline Post 16-19 travel assistance options which may be available to them. Support will be provided for children, young</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				<p>people and their families making a transition to a new travel assistance option including information for each step, independent travel training and information on how families and schools can build children's/young people's confidence on public transport and getting around.</p> <p>Accessible information will be placed on the Council's website. This information will be co-produced with stakeholders inclusive of young people.</p> <p>Refreshed Post 16-19 Home to school travel assistance policy statement The refreshed policy statement has been co-produced with stakeholders.</p> <p>The policy statement will be shared through a range of communication tools and resources. For example, the Council's website and social media accounts. The refreshed policy statement will support parents/carers and stakeholders to understand better what factors the Home to school travel service consider when assessing applications and the offer of travel assistance.</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				<p>Application process It is envisaged that the Post 16-19 application process will be available online from 1 April 2023. The automated decision software will enable parents/carers and young people to know and understand more about the eligibility criteria and travel assistance offers.</p> <p>The intention to introduce application periods for Post 16-19 home to school travel assistance. Payment of a PTB will be made at the start of each term. This will allow young people and their parents/carers to plan and ensure that travel arrangements are in place. It should be noted that the Council will gather attendance information at the end of each term. If a young person's attendance falls below the expected level the Council could deduct an amount from the next terms payments.</p> <p>Partnership working with stakeholders The Home to School travel service will work in partnership with stakeholders to promote sustainable active travel assistance. Officers within the home to school travel service will continue to work with teams/services across the Council to further improve</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				<p>knowledge and understanding of home to school travel assistance. As a result, there should be an increased awareness and promotion of travel assistance offers to help prepare young people for transition to adulthood and to gain maximum independence.</p> <p>There will be continued close liaison with pre and post-16 education and voluntary sector providers to encourage them to offer or signpost sources of support to families and where appropriate support young people as they move to becoming independent travellers. Education providers know the individual circumstances of their students and will be well placed to target available funding at the most vulnerable. Also encouraging training organisations to improve provision and efficiency of travel arrangements for their own students through working in partnership when it may be possible to share transport provision or routes.</p> <p>In partnership with other Council services, voluntary sector providers and young people look at engaging with transport operators to develop their knowledge and understanding of</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				disabilities, looking at strategies to strengthen accessibility of public transport for children and young people.
Disability – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments	<p>The Post 16-19 travel statement enables all parents/carers/ learners to make an application for discretionary travel assistance</p> <p>Yes Deaf people Hearing impaired Visually impaired Young people with learning difficulties Young people living with autism Young people with physical impairment</p>	<p>The training will support the young person to learn the necessary skills to allow them to effectively deal with and resolve a range of scenarios that they might encounter when travelling independently on public transport.</p> <p>Potential to release a number of hackney taxis back to the general population as they would not be needed for Post 16-19 home to school travel</p>		<p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
		This has the potential to increase the number of wheelchair accessible vehicles back at peak times of use.		
<p>Gender identity- trans and those people who don't identify with a particular gender, for example, non-binary, genderfluid, genderqueer, polygender and those who are questioning their gender or non-gendered identity.</p>	<p>The proposal will not have any impact on one gender identify over another. Home school transport is provided regardless of gender identity; therefore, the implementation of the policy will not have an impact on this area.</p> <p>The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of gender identity.</p>	<p>The proposal may allow individuals the opportunity to access services and peer groups independently from their families. As young people will have more control over their before and after school/college activities being able to go to places to support their identities. Independent travel training will support the development of lifelong</p>		<ul style="list-style-type: none"> • The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
		functional skills to support opportunity of access to LGBT services.		
Marriage and Civil Partnership	The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of marriage and civil partnership.			<ul style="list-style-type: none"> The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>
Pregnancy and maternity - women who are pregnant or who have recently had a baby, including breast feeding mothers	<p>The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of pregnancy and maternity.</p> <p>Pregnancy and maternity are not distinguishing factors in the application process or the offer of home to school travel. In practice, however, it may be more difficult for women in the later stages of pregnancy. In normal circumstances, the parent is expected to determine how their child will get to school and this may include making appropriate arrangements such as with a friend or a childminder to ensure that the child is accompanied, as appropriate.</p>			<ul style="list-style-type: none"> The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
	<p>The Home to School Travel assistance policy statement includes provision where a parents' disability prevents them from accompanying the child along a walking route. We would normally expect other adult(s) with parental responsibility to take the child to school or make appropriate arrangements.</p> <p>However, we can consider a temporary medical condition for a parent under the provision for exceptional circumstances. This could include issues associated with pregnancy where there is medical evidence from the GP and/or Consultant. Travel assistance or alternative support may be provided for a time-limited period based on the medical information available.</p>			
<p>Race - the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community</p>	<p>There is no evidence to suggest that there will be a disproportionate impact upon learners based on race or ethnicity.</p>			<ul style="list-style-type: none"> • The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance • The planned introduction of an online application forms may assist applicants as they may be able to seek the help of other family members or community workers. • The Home to School Travel Service and Council services are available for telephone or face to face support. Sometimes people may not be able to read English but are sufficiently

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				<p>proficient to be able to speak to someone for advice and support in completing an application and or appeal</p> <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>
<p>Religion or belief or none - the effects on religious and cultural communities, customers and colleagues</p>	<p>The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of religion or belief or none.</p>			<ul style="list-style-type: none"> • The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance. • The planned introduction of an online application forms may assist applicants as they may be able to seek the help of other family members or community workers. • The Home to School Travel Service and Council services are available for telephone or face to face support. Sometimes people may not be able to read English but are sufficiently proficient to be able to speak to someone for advice and support in

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				<p>completing an application and or appeal</p> <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>
Sex - the effects on both men and women and boys and girls	<p>The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of sex.</p> <p>The proposal will not have any impact on one gender over another.</p>			<ul style="list-style-type: none"> The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for discretionary travel assistance <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>
Sexual orientation - the effects on lesbians, gay men, bisexuals, pansexual, asexual and those questioning their sexuality	<p>The proposal and associated policy statement does not currently, nor will it, discriminate on the basis of sexual orientation.</p>			<ul style="list-style-type: none"> This policy has the potential to have a positive impact on advancing equality of opportunity as young people will be able to independently access services and support away from home, school or college. The Post 16-19 travel policy statement enables all parents/carers/ learners to make an application for

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
				<p>discretionary travel assistance.</p> <p>The key themes raised during the public consultation events are detailed in the section for age</p> <p>The key mitigations identified are detailed in the section for age.</p>

Important - For any of the equality groups you don't have any information about, then please contact our Lead on Equality and Diversity for help. You can also get lots of information on reports completed from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

Step 3 – deciding on the outcome

7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

Outcome 1		No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2		Adjust the proposal to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
Outcome 3	Y	<p>Continue the proposal despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:</p> <ul style="list-style-type: none"> • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • plans to monitor the actual impact.
Outcome 4		Stop and rethink the proposal when the EIA shows actual or potential unlawful discrimination

It is crucial that the Council recognises and listens to the voice of young people to support and promote increased independence for young people with SEND as they become young adults, so that they can take part in work and social opportunities more easily.

Although they are not conclusive, financial factors can and need to be taken into account as a relevant consideration when the Council exercises its discretion, along with other relevant considerations such as the public sector equality duty. The extent of the impact will vary according to the individual family

circumstances and the specific nature of the change as set out above. If the proposal is approved and following implementation, there will be a 12-month post implementation review to ensure that any adverse impacts on young people are being considered and mitigation where possible is taking place.

Following the robust consultation period, we have carefully and conscientiously taken the views of respondents into account and considered the impact of the proposal in relation to equality. We have considered whether the proposal could lead to actual or potential discrimination and have considered whether the mitigation we have proposed is sufficient. We believe that the mitigation measures that we have proposed demonstrate that we have met the authorities' responsibilities in relation to equality.

Appendix 1 – Climate Impact Assessment



CIA Post 16 V1.xlsx

Appendix 2 – Data profile Public Consultation



HTST Data
Tables.docx

Appendix 3 – Consultation document



Home to School
Transport.pdf

Appendix 4 – Easy Read version



Easy read HTST for
printing.pdf

Equality impact assessment form– please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact, you need to do an equality impact assessment whenever a decision is needed about our services and functions that affects people and **before** that decision is made. This also includes quick Covid 19 related decisions.

We use the term 'policy' as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures.
- Key decisions such as allocating funding to voluntary organisations, budget setting.
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to complete them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't. The nine protected characteristics are age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race religion and belief, sex and sexual orientation.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

This completed form should be attached to any Corporate Leadership, Senior Leadership, Cabinet or Personnel Committee report to help decision makers take the equality implications into account when they make the decision. Equality impact assessments **must be done before** decisions are made.

You'll find that completing these assessments will help you to:

- understand your customers' and communities needs

- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Unless this is a quick Covid 19 decision, don't do the form by yourself. Get a small team together and make sure you include key people in the team such as representatives from our Equality Hubs and Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

Remember, we need to complete these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010. If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and must be easy to understand.