

Everyone different,
everyone matters



Equality & Community Cohesion Impact Assessment (EIA)

Directorate: Public Services Service Area: Transport Services	Lead Officer: Phil Taylor Date completed: 31 January 2024
Service / Policy / Function or Procedure to be assessed: Home to School Transport Policy	
Is this: New / Proposed Existing/Review Changing <input checked="" type="checkbox"/> (Please tick appropriate box)	Review date: December 2024

Part A - Initial Assessment to determine if a full Impact Assessment is required

What are the aims and objectives/purpose of this service, policy, function or procedure?

Home to school transport is a statutory function for local authorities to provide transport assistance to eligible students. The aim of the proposed policy, is to improve clarity and understanding of transport assistance that is available, to eligible students, following the updated guidance issued by the DfE in June 2023

Please indicate its relevance to equality by selecting yes or no

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	YES	
Advancing equality of opportunity	YES	
Fostering good community relations	YES	

If not relevant and this is agreed by your Head of Service, the Impact Assessment is now complete - please send a copy to your Directorate Equality Champion & to the Cohesion and Equality Team. **If relevant**, a full Impact Assessment needs to be undertaken (PART B below).

PART B: Full Impact Assessment

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	To ensure that the policy is equitable and that all applicants are treated and assessed in the same way, in line with the policy criteria
Are there any associated policies, functions, services or procedures?	no
How will this service be delivered? (e.g. direct service delivery, commissioned/outourced etc)	A mix of direct service, commissioned and outsourced delivery
If partners (including external partners) are involved in delivering the service, who are they?	West Yorkshire Combined Authority, Taxi providers and Passenger Transport Operators

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

The existing service users are a range of ages (from 4-19 for school/college transport and over 19 for day care passengers)
Most protected characteristics are not relevant to the eligibility of a student/passenger when assessment for transport is carried out.

Religion or belief

- Section 509D of the Education Act 1996 requires local authorities to have regard to any wish of a **parent** to have their child educated at a school based on their religion or belief, when exercising their school travel duties. This does not mean local authorities must arrange travel to a school with a designated religious character for a child who **parents** have chosen it on the grounds of their religion or belief.
- Any requests for free transport assistance on the grounds of religion or belief (other than those considered under **extended rights**), will be considered on a case-by-case basis as part of the appeals process.
- Beliefs which are not included in the duty are:
 - a. A wish for a child to attend a particular type of school (i.e., grammar or same sex school)
 - b. **Preference** for a particular type of governance or management
 - c. A belief that a child should be educated privately
 - d. A wish for a child to attend a school where they would be taught in a specific language
 - e. Objection to rules relating to school uniforms
 - f. Content of school curriculum (i.e., sex education)
- Evidence will be required to demonstrate belief, for example a baptismal certificate.

Transport Service provides assistance for 2000+ passengers without reference/impact on any 'equality strands'.

Has there been any consultation with, or input from, service users, staff or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

Full consultation has been carried out (from 4 December 23 to 26 January 2024). A list of those consulted can be found by contacting Transport Services (transport@calderdale.gov.uk). These are also referenced in the cabinet report.

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

No – there is no record of any complaint/compliment etc that is in relation to a protected characteristic/equality strand.

Step 3 – Identifying the impact

a. Is there any impact on individuals or groups in the community?

(think about age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups)

Barriers:

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g. the facilities/premises;
- **Who** provides it, e.g. are staff trained and representative of the local population/users?
- **How** it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g. opening hours?
- **What** is provided, e.g. does the service meet everyone's needs? How do you know?

* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.

Solutions:

What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:

- Other arrangements that can be made to ensure people's diverse needs are met;
- How your actions might help to promote good relations between communities;
- How you might prevent any unintentional future discrimination.

Protected Characteristic	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Age (including children, young people, Children Leaving Care and older people)	The Home to School Transport Policy follows statutory guidance to provide free home to school transport for eligible pupils aged 5 – 16. Children can attend school from the age of 4 (in the term they reach their fifth birthday)	The Home to School Transport Policy allows free Home to School Transport for 4 year olds that meet the eligibility criteria.

Disability (including carers)	Specialist vehicles for the transportation of passengers with disabilities is provided. In some extreme cases, transport may not be provided due to passenger safety reasons.	Identify alternative ways in which transport assistance can be provided (eg offer personal transport budget)
Race (including Gypsies & Travellers and Asylum Seekers)	None – groups such as Asylum Seekers are considered under the low income criteria and where they qualify, assistance would be provided	
Religion or Belief (including people of no religion or belief)	Free Home to School Transport is only considered under religion or belief grounds for families who meet low income criteria. This follows statutory guidance.	Applications for free transport under religion or belief from families outside the low income criteria are given the right to appeal and discretionary transport can be awarded on a case by case merit.
Gender Reassignment (those that are going through transition: male to female or female to male)	Not relevant to service	
Pregnancy and Maternity	Accessing a vehicle by steps	Consider alternative transport provision that does not have steps (ie taxi instead of minibus)
Sex (either male or female and including impact on men and women)	Not relevant to service	
Sexual Orientation (including gay, lesbian, bisexual and heterosexual)	Not relevant to service	
Additional Characteristic	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Socio-economic (low wage/low income)	Low income criteria is included within the policy to assist with travel arrangements.	

b. Is there/will there be any impact on staff or potential recruitment of staff?

(think about the diversity of the workforce delivering the service, relevant training and development needs and opportunities for Children Leaving Care alongside initiatives to encourage applications from other equality strands to help build a workforce reflective of the communities we serve).

Employee Protected Characteristic	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
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Age	Drivers can only be recruited currently, if they hold a category D1 (minibus) licence. This means they will have passed their driving test (car) before January 1997, or since passed a specific D1 driving test. The youngest a driver can therefore be without taking a separate D1 driving test is 43.	Seek to recruit younger drivers (B licence holders) and train them to become a D1 licence holder. This has a financial impact (approx. £1200 per person)
Disability	Disability dependent.	Identify disability and put in place reasonable adjustments to allow the individual to perform their duties.
Gender Reassignment	Gender neutral toilet facilities are not available at Battinson Road Depot	Provide gender neutral facilities at the depot (consider cost implication)
Pregnancy & Maternity	Heavy duties (eg wheelchair clamping)	Carry out risk assessment and identify light duties
Marriage and Civil Partnership	None	
Race	None	
Religion or Belief	None	
Sex	None	
Sexual Orientation	None	
Additional Characteristic	Barriers/Impacts identified	Solutions (ways in which you could mitigate the impact)
Socio-economic (low wage/low income)	Roles with Transport Services (drivers and PA's are low end pay grades)	Consider higher rates of pay. Consider contractual hours to enable Universal Credits to be less impacted

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

None identified.

Step 5 – Monitoring

How are you going to monitor the existing service, policy, function or procedure?

Through compliments, complaints, audit and ad-hoc spot checking.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale

EIA approved by:

Relevant Head of Service:
Ian Day

Date:
February 2024

Please send an electronic copy of the EIA to the Cohesion and Equality Team and unless the EIA contains sensitive or confidential information ensure the document is uploaded to the EIA Register on the Intranet.

A brief summary of the EIA will be placed on the Council's website.

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Updated July 2023