

Appendix 5 - RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

<p>Under the Equality Act 2010 Protected characteristics are age, disability, gender, gender identity, race, religion or belief, sexuality, civil partnerships and marriage, pregnancy and maternity. Page 6 of guidance. Other areas to note see guidance appendix 1</p>	
<p>Name of policy, service or function. If a policy, list any associated policies:</p>	<p>Home to School Transport Policy 2018</p>
<p>Name of service and Directorate</p>	<p>Community Safety & Streetscene Regeneration & Environment</p>
<p>Lead manager</p>	<p>Martin Raper – Head of Service Streetscene</p>
<p>Date of Equality Analysis (EA)</p>	<p>Initial EA 21st September 2017 Reviewed 6th February 2018.</p>
<p>Names of those involved in the EA (Should include at least two other people)</p>	<p>Andrew Barker – Fleet Transport Manager Julia Russell – Passenger Services Manager</p>
<p>Aim/Scope</p> <p>This Equality Impact Assessment refers to the outcomes of the home to school transport consultation and recommendations for the Home to School Transport Policy for 2018. The proposals impact upon children, young people and vulnerable adults who currently are, or in future may be eligible for home to school/college transport assistance organised by the Council because they meet eligibility criteria</p>	
<p>What equality information is available? Include any engagement undertaken and identify any information gaps you are aware of. What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?</p> <p>This Equality Assessment refers to the outcomes of the home to school transport consultation and recommendations for the Home to School Transport Policy for 2018. Information has been analysed from the consultation undertaken, this information has been used to develop recommendations for Home to School Transport policy</p>	

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Engagement undertaken with customers. (date and group(s) consulted and key findings) See page 7 of guidance step 3

Officers have undertaken a full public consultation on the proposed changes to the Home to School Policy in line with the statutory guidance, which commenced on 25 September 2017 and closed on 10 November 2017. The areas for consultation included the following:

- General eligibility for children and young people;
- the provision of independent travel training;
- the provision of personal travel budgets;
- changes to post 16 transport policies;
- Welfare benefits related to mobility.

The consultation was publicised using various mechanisms including online, social media and traditional media. Rother FM, the Rotherham Advertiser and the Rotherham Record were amongst those who featured the consultation. Feedback was invited primarily through the Council’s website as well as inviting feedback in the form of a questionnaire, written comment forms from meetings and drop-in sessions.

The Home to School Transport Team also undertook a range of additional activities in order to capture as many views as possible. These activities included;

- A member’s seminar held in September;
- Report to the Council’s Overview and Scrutiny Management Board;
- Letters to parent/carers using the services and stakeholders;
- Six informal drop in sessions at the customer service centres in Maltby, Aston, Swinton, and three sessions at Riverside House. There were a total of forty six attendees at these sessions;
- Attendance at the Rotherham Parents/Carer Forum Centre;
- Four meetings at Special Schools, Willows, Kelford, Hilltop, and Abbey School attended by 58 parents and carers.

The online survey attracted 244 respondents, of which

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	<p>201 were parent/carers of transported pupils and 43 were non parent/carers.</p> <p>For each of the consultation areas, responders were asked to consider whether young people with lower levels of special educational needs should be provided with the appropriate level of support for their individual needs, this may include independent travel training (ITT), bus passes and personal transport budgets (PTB) and whether continuation of transport assistance should be reviewed and regularly re-assessed jointly between CYPS and the Corporate Transport Team.</p> <p>Responders were asked to consider whether they felt their child's transport needs should be reviewed annually in conjunction with their Education, Health and Care Plan (EHCP). The response was:</p> <ul style="list-style-type: none">• 55% of parent / carers either strongly agreed / agree, and 18% neither agree nor disagree with the proposal;• 74% of responders who are non-parents or carers either strongly agree or agree with the proposal. <p>Overall, the majority of respondents support the proposal to review individual's transport needs particularly at transition stages which would be positive change as transport has previously only been discussed when an issue arises.</p> <p>The proposal is to develop and promote Independent Travel Training as a central service in Rotherham and apply it particularly at transitional stages. Consideration was also needed on whether the Council should offer and promote alternative options to complement transport arrangements, such as bicycle loans or grants, walking buses and bus passes is an important consideration. Respondents were asked to consider whether:</p> <p>Supporting their child to develop the necessary skills to travel independently would be something they might consider, if the child was given the right support and training?</p> <ul style="list-style-type: none">• 73% of parent / carers either strongly disagree, or disagree with the proposal;
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	<ul style="list-style-type: none"> • 71% of responders who are non-parents or carers either strongly agree or agree with the proposal. <p>Respondents were also asked what age or stage they felt independent travel training should be accessible to their child.</p> <ul style="list-style-type: none"> • 86 % of parent / carers felt age 14+ was appropriate for independent travel training to be provided to a young person; • 62% of responders who are non-parents or carers felt Age 14+ was an appropriate age for independent travel training to be accessible for parents. <p>Parent / carers have responded very strongly about the travel-training proposal with the vast majority being opposed to the proposals, whilst respondents who are non-parents or carers have expressed support for the proposal. It is clear from the responses and feedback received, that concern remains about how this proposal would be administrated.</p> <p>Families would be seeking assurances from the Council that a child’s participation would be appropriately assessed and that those children with severe and complex needs, both physical and medical, would not be expected to take part. Whilst this appears to be a positive outcome, the implementation of the proposal would need to structured and communicated appropriately to families.</p> <p>The PTB scheme is another option that can be offered to provide transport support for families of children with special educational needs and disabilities in Rotherham.</p> <p>Responders were asked to consider:</p> <p>Whether parents and carers with children travelling on high cost single occupancy taxis should be offered a personal travel budget for their child or children to travel from school to college?</p> <ul style="list-style-type: none"> • 63% of parent / carers either strongly
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	<p>disagree, or disagree with the proposal;</p> <ul style="list-style-type: none"> • 54% of responders who are non-parents or carers either strongly agree, or agree with the proposal. <p>In response to the following question:</p> <p>If you opted for a personal travel budget, if approved, how would you like the cost to be determined?</p> <ul style="list-style-type: none"> • 44 % of parent / carers felt a distance calculation was appropriate for calculating a personal travel budget; • 44% of responders who are non-parents or carers felt a distance calculation was appropriate for calculating a personal travel budget. <p>With regard to making a calculation of the budget, respondents were asked to suggest what other options/barriers should be considered and factored into formulating a budget?</p> <p>Responses received included:</p> <ul style="list-style-type: none"> • Families to be given the actual cost of a taxi; • Being able to choose transport provider but want the actual cost being reimbursed rather than a part sum of money; • The Council should monitor and audit the spending on PTB's to prevent any abuse these resources; • Children were being educated out of area because schools in Rotherham are full they have to travel further and this would mean a higher cost for the family; • Increased traffic around schools if more families opted for PTB's; • Lack of parking facilities at schools; • Families should not be out of pocket. <p>Overall parent / carers expressed disagreement with this proposal, however, the majority of responders who</p>
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	<p>are non-parents or carers supported it. Parent / carers also expressed concern that the proposal would have a financial impact on them and that if they accepted a personal budget they would be unable to change back to the traditional service if it was not working for them.</p> <p>The Council, therefore needs to consider the above when reviewing the transport policy and ensure they can be mitigated. This would ensure families who wished to participate had the flexibility in how transport would be delivered and provide continuity of arrangements.</p> <p>An alternative approach to existing post 16 transport arrangements is to replace direct transport arrangements (e.g. single person taxi journeys) for those students over the age of 16 with special educational needs and disabilities, with personal transport budgets as a first option, and to promote Independent Travel Training and use of bus passes to complement the use of Personal Transport Budgets.</p> <p style="text-align: center;">Responders were asked:</p> <p style="text-align: center;">Whether young people in further education (college, sixth form) should only have access to personal transport budgets? This could include bus passes or cycle / moped grant scheme.</p> <ul style="list-style-type: none">• 51% of parent / carers either strongly disagree, or disagree with the proposal;• 55% of responders who are non-parents or carers either strongly agree, or agree with the proposal. <p>The responses received for this area of the consultation is fairly balanced with similar views from parents / carers and non-parent carers. Parent / carers expressed concern that there would be a financial impact on them should these proposals be implemented.</p> <p>For those learners in post 16 education, the new Department for Education statutory guidance (October 2017 edition) states that local authorities have to provide financial assistance to facilitate attendance and give specific consideration of learners with special educational needs and disabilities. The financial</p>
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	<p>assistance can be awarded as a personal transport budget or a reasonable financial contribution towards transport for families. To aid transparency, the guidance indicates it is helpful for local authorities to set out the average cost per young person of post 16 transport in their area before any subsidies are deducted. The guidance also includes suitable and appropriate alternatives such as cycle schemes, moped schemes and travel training schemes to enable young people to travel on public transport independently.</p> <p>For families who are in receipt of Disability Living Allowance, Personal Independence Payment or a 16-19 Student Bursary, a contribution from this should be made towards any travel assistance.</p> <p>Responders were asked to consider the following:</p> <p>When calculating travel assistance contribution costs, do you think the Council should consider whether families receive the following benefits?</p> <ul style="list-style-type: none">• Disability Living Allowance• Personal Independence Payment• 16-19 Student Bursary <p>The following responses were received to the question on whether the Council should take these payments into consideration?</p> <ul style="list-style-type: none">• 65% of parent / carers either strongly disagree, or disagree with the proposal;• 53% of responders who are non-parents or carers either strongly disagree agree, or disagree with the proposal. <p>The Council cannot legally take Disability Living Allowance into account within current statutory guidance for those aged 5-16 years old. However, for those learners in post-16 education, the new Department for Education statutory guidance clarifies that local authorities may ask learners and their parents for a contribution to transport costs. In exercising this discretion, the Council must ensure that any</p>
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	<p>contribution is affordable for learners and their parents and ensure that there are arrangements in place to support those families on low income. Local authorities may take receipt of 16-19 student bursary funding into account in assessing an individual’s need for financial help with transport.</p>
<p>Engagement undertaken with staff about the implications on service users (date and group(s)consulted and key findings)</p>	<p>During the consultation period the engagement was with customers and stakeholders. Senior Managers and Directors within service areas affected by proposed changes have been in dialogue through a Corporate Transport Board.</p>

The Analysis

How do you think the Policy/Service meets the needs of different communities and groups? Protected characteristics of age, disability, gender, gender identity, race, religion or belief, sexuality, Civil Partnerships and Marriage, Pregnancy and Maternity. Rotherham also includes Carers as a specific group. Other areas to note are Financial Inclusion, Fuel Poverty, and other social economic factors.

As of January 2017, there were over 44,700 children and young people attending state funded schools in Rotherham. From these numbers, 2113 attend Rotherham school sixth forms. In July 2017 here were 1,699 children who had an Education, Health and Care Plan (EHCP) or a Statement of Special Educational Needs (SEN). There are over 5,900 children who need a lower level of support around SEN. There are over 900 children living in Rotherham on the children’s disability register. In January 2017 there were 624 children attending Rotherham special schools and 142 children attending a pupil referral unit within Rotherham.

Access to transport assistance is not determined by gender, race, religion or belief but disability is a protected characteristic that is used to assess entitlement. This includes physical disabilities, mental health issues, learning difficulties, progressive conditions, visual impairment and hearing impairment.

Eligibility for transport is assessed through an individual’s application process. The type of additional need/SEN and disability forms part of this assessment. The Council must meet a statutory requirement to ensure that Home to school transport is provided and free for all children and young people who qualify under the age of 16.

For those young people over the age of 16 and attending further education provision there is a contributory charge towards daily transport. For those families who meet the low income threshold criteria this is currently free of charge.

This entitlement would remain; it is the type of the provision which forms the basis of the

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proposed changes.

Specific elements of these proposals impact upon

- Children under 16
- Children 16-18
- Adults 18+ accessing home to college transport

Analysis of the actual or likely effect of the Policy or Service:

Does your Policy/Service present any problems or barriers to communities or Group? The policy does not present any problems or barriers.

Does the Service/Policy provide any improvements/remove barriers? The policy provides an improved offering for families and young people requiring transport provision with Education Health Care Plans, by promoting independence, offering choice, and promoting a healthy life style.

What affect will the Policy/Service have on community relations? The Home to School transport policy recommendations will not affect community relations

Current and proposed future changes to policy will adhere to the Equality Act 2010 and the Special Educational Needs and Disability Regulations 2014.

Please list any **actions and targets** by Protected Characteristic that need to be taken as a consequence of this assessment and ensure that they are added into your service plan.

Website Key Findings Summary: To meet legislative requirements a summary of the Equality Analysis needs to be completed and published.

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Equality Analysis Action Plan - See page 9 of guidance step 6 and 7

Time PeriodApril 2018.....

Manager: Martin Raper..... Service Area: Streetscene..... Tel:..22223.....

Title of Equality Analysis: Consultation on Home to School Transport Policy 2018

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic.

List all the Actions and Equality Targets identified

Action/Target	State Protected Characteristics (A,D,RE,RoB,G,GI O, SO, PM,CPM, C or All)*	Target date (MM/YY)
An assessment matrix has been developed which will be used to assess individual needs of applicants, ensuring those applying for transport will not be discriminated against.	Disability	April 2018
Any recommended changes to post 16/further education transport will need to take into account the new statutory guidance for local authorities issued by the Department for Education October 2017.	Disability	April 2018
Any recommended changes to home to school transport policy will need to adhere to the Equality Act 2010 and the Special Educational Needs and Disability Regulations 2014.	Disability	April 2018

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Name Of Director who approved Plan		Date	

*A = Age, C= Carers D= Disability, G = Gender, GI Gender Identity, O= other groups, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage.

Website Summary – Please complete for publishing on our website and append to any reports to Elected Members, SLT or Directorate Management Teams

Completed equality analysis	Key findings	Future actions
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Completed equality analysis	Key findings	Future actions
<p>Directorate:</p> <p>Function, policy or proposal name:</p> <p>.....</p> <p>Function or policy status: (new, changing or existing)</p> <p>Name of lead officer completing the assessment:</p> <p>Date of assessment:</p>		