

PART B – Equality Analysis Form

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 and diversity.

This form:

- Can be used to prompt discussions, ensure that due regard has been given and remove or minimise disadvantage for an individual or group with a protected characteristic
- Involves looking at what steps can be taken to advance and maximise equality as well as eliminate discrimination and negative consequences
- Should be completed before decisions are made, this will remove the need for remedial actions.

Note – An Initial Equality Screening Assessment (Part A) should be completed prior to this form.

When completing this form consider the Equality Act 2010 protected characteristics Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity and other socio-economic groups e.g. parents, single parents and guardians, carers, looked after children, unemployed and people on low incomes, ex-offenders, victims of domestic violence, homeless people etc. – see page 11 of Equality Screening and Analysis Guidance.

| 1. Title | |
|---|--|
| Equality Analysis title: Home to School Policy Review | |
| Date of Equality Analysis (EA): 22/04/2025 | |
| Directorate: Regeneration and Environment | Service area: Community Safety and Street Scene |
| Lead Manager: Karen Mudford | Contact number: 07554436548 |
| Is this a: | |
| <input checked="" type="checkbox"/> Strategy / Policy | <input type="checkbox"/> Service / Function <input type="checkbox"/> Other |

If other, please specify

2. Names of those involved in the Equality Analysis (Should include minimum of three people) - see page 7 of Equality Screening and Analysis Guidance

| Name | Organisation | Role (eg service user, managers, service specialist) |
|---------------|--|---|
| Karen Mudford | Rotherham Metropolitan Borough Council | Head of Fleet & Transport Services |
| Paul Topham | Rotherham Metropolitan Borough Council | Interim Transport Services Manager |
| Elise Saxton | Rotherham Metropolitan Borough Council | Transport Business & Projects Manager |

3. What is already known? - see page 10 of Equality Screening and Analysis Guidance

Aim/Scope (who the Policy/Service affects and intended outcomes if known)

This may include a group/s identified by a protected characteristic, others groups or stakeholder/s e.g. service users, employees, partners, members, suppliers etc.)

The Council have a statutory responsibility to make suitable travel arrangements to and from school for eligible children of compulsory school age. Statutory guidance is published by the DfE and sets out what local authorities must do to comply with the law.

The RMBC Home to School Policy had a full review and rewrite for the 2024/2025 Academic year and published in March 2024.

Policy has now been updated with minor changes to ensure it reflects the academic dates and complies with statutory duties for 'Post 16 Transport Policy Statement Obligations'.

The revised policy was approved by Cabinet in March 2024, and the equalities screening assessment and equality analysis was undertaken.

What equality information is available? (Include any engagement undertaken)

Overview

All of the quality information extracted follows the focus of the equalities screening. In particular, data regarding age of resident and disability were compared against the national average for context.

The overall focus of the Home to School Policy is ensuring that children can get to and from school. As a result, it is important to focus on statistics relating to children/young

people specifically; for example, 18.6% of Rotherham residents are schoolchildren students in full-time education.

Disclaimer

The following data is extracted from the following sources:

- 2011 UK Census (England and Wales only) – Office for National Statistics
- 2021 UK Census (England and Wales only) – Office for National Statistics
- Fingertips, Public Health Data – Office for Health Improvements & Disparities
- Local area Special Educational Needs and Disabilities report for unknown – SEND research from Department for Education

Religion and belief

39.8% of Rotherham residents declare having no religion, representing a +17.44 percentage point increase since 2011. Despite this sharp increase, individual religious affiliation has fluctuated; of the religions stated on the Census 2021, the following are listed below with the associated percentage point increase/decrease since 2011:

- Christian (-17.5pp)
- Buddhist (0.0pp)
- Hindu (+0.1pp)
- Jewish (0.0pp)
- Muslim (+1.3pp)
- Sikh (+0.1pp)
- Other religion (+0.1pp)
- Not answered (-2.7pp)

Age

The main consideration for age surrounds the percentage of school age children in the Borough and the potential impact that this has on the provision of the Home to School Policy.

18.9% of Rotherham residents are aged 15 and under, which is higher than the average in England and Wales. Between 2011 to 2021, the ratio of people aged 15 years and under in Rotherham fell by -0.2pp.

There is considerable variation between wards regarding the percentage of people aged 16 years or under resident.

The three wards with the highest respective populations are:

- East Herringthorpe (24.5%)
- Eastwood & East Dene (23.8%)
- Rotherham Central (22.9%).

Meanwhile, the three wards with the lowest respective populations are:

- Thorpe Hesley (13.4%)

- Greasbrough (14.0%)
- Maltby West & Hellaby (15.5%).

It may be worth noting that these areas tend to be more highly densely populated compared to wards with both sparse and older populations on average. Current Home to School Policy should evaluate equality with respect to differences between children accessing Home to School transport in concentrated vs. remote areas within Rotherham.

Disability and Health

Overall, the number of children with learning difficulties known to schools in Rotherham (26.1 per 1,000) is lower than the national average in England (34.4 per 1,000). This trend is consistent, when subdivided into moderate and severe learning difficulties. However, with respect to profound and multiple learning difficulties known to schools, the number of children is higher than the national average in England (1.55 per 1,000 vs. 1.29 per 1,000).

Rotherham is within the 75th percentile for children with autism known to schools (26.2 per 1,000); this is considerably higher than the average in England (18.0 per 1,000).

21.3% of Rotherham residents declare themselves disabled under the Equality Act 2010; 11.4% of residents state that their day-to-day activities are limited a little, whilst 9.9% of residents that their day-to-day activities are limited a lot.

7% of Rotherham residents either have bad or very bad health, representing a -1.00pp fall since 2011.

Marriage/civil partnership

9.2% of Rotherham residents represent couples who are either married, separated or divorced, but no longer live together. There has been a -0.2pp fall in the number of married couples who do not live together, but there has been no percentage point change for the latter two categories.

Other considerations

(i) EAL

According to the 2021 Census, 1% of Rotherham residents aged 3 years and over do not have English as their main language and/or cannot speak English well. Wards within Rotherham with the rates above the Borough average include:

- Rotherham Central (7.5%)
- Masbrough & Bradgate (5.8%)
- Eastwood & East Dene (5.0%)
- Rotherham South (3.8%)

Compared to the 2011 Census, the 2021 Census reveals that there has been a -0.70pp fall in people who describe English as their main language.

During the consultation preparation, we ensured that changes to Home to Policy assessed, not only the individual child's/young person's circumstance, but also that of the parent(s)/carer(s). Currently, 57.8% of Rotherham residents aged 16 and over are economically active, whilst 11.5% of Rotherham residents aged 5 and over provide some form of unpaid care.

(ii) EHCP and SEND

The Home to School Policy contains specific provisions and requirements for children/young people with an EHCP and/or SEND. Section 6.1 details the process for naming a school in a child/young person's EHCP and Section 6.6. details alternative provision improvement plan related to SEND.

In the academic year 2022/23, 4.6% of pupils in Rotherham had an EHCP, higher than the average across all schools in England of 4.2%. Meanwhile, 15.8% of pupils in Rotherham had an EHCP, higher than the average across all schools in England of 12.9%.

(iii) Socioeconomic factors

Socioeconomic factors, including deprivation, also play a key role in eligibility for Home to School Transport. As a result, it is important to highlight that Rotherham generally exceeds the average across England with respect to child deprivation. For example, the percentage of children (under 16s) in absolute low-income families in Rotherham is 17.9%, which is higher than the average in England (15.3%). Equally, the percentage of children (under 16s) in absolute low-income families in Rotherham is 22.9%, compared to 19.9% across England.

(iv) Multiple protected characteristics

Sometimes, it is acknowledged that protected characteristics overlap and that protected characteristics are transient. For instance, the percentage of teenage mother in Rotherham is 1.3%, whilst the average across England is 0.6%. In recognising the role of both age and maternity in this given example, the Home to School Policy ought to recognise the extent to which diversity operates across protected characteristics.

Are there any gaps in the information that you are aware of?

No gaps in the information have been identified.

What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?

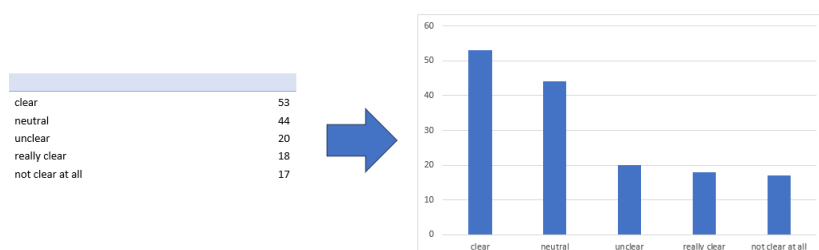
The most pertinent questions relating to equalities during the formal consultation which took place during the previous academic year were as follows:

1. Within the current policy, is it easy to understand if a child is eligible for assisted 'Home to School Transport' for those with special educational needs and disabilities?

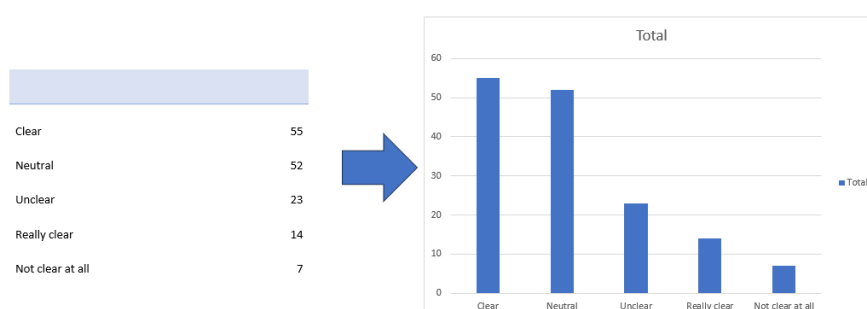
2. How clear do you think the current policy explains transport eligibility, for young people over the age of 16?

Analysis of response to this question were as follows:

Within the current policy, is it easy to understand if a child is eligible for a 'Zoom Zero Travel Pass'?



How clear do you think the current policy explains transport eligibility, for young people over the age of 16?



Engagement undertaken with customers. (date and group(s) consulted and key findings)

All appropriate consultation was undertaken during the academic year 2024/2025 when the whole Home to school transport policy was refreshed. As per below: Digital/postal consultation activity is not listed. Some consultation events occurred over days and weeks; the dates given below are the **completion** dates:

19/01/2024 – North Regional LA Forum
 08/02/2024 – Parent/Carer Forum
 09/02/2024 – SENDCO Network
 22/02/2024 – School Event – Elements Academy
 22/02/2024 – Special School Headteachers
 22/02/2024 – Introductory Meeting – SYMCA
 22/02/2024 – External transport operators

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|--|--|
| | As the Home to school Transport Policy only has slight amendments this time around, there is no requirement to engage in a full formal consultation. |
| Engagement undertaken with staff (date and group(s) consulted and key findings) | Relevant documentation circulated to all appropriate staff 24.4.2025. |

4. The Analysis - of the actual or likely effect of the Policy or Service (Identify by protected characteristics)

How does the Policy/Service meet the needs of different communities and groups? (Protected characteristics of Age, Disability, Sex, Gender Reassignment, Race, Religion or Belief, Sexual Orientation, Civil Partnerships and Marriage, Pregnancy and Maternity) - see glossary on page 14 of the Equality Screening and Analysis Guidance)

Age

The Home to School draft Policy considers the eligibility for children/young people between the age of 5-16, with one exception:

Children below to ages of 5 years are not eligible for Home to School transport if they start compulsory education before the age of 5; RMBC is able to exercise discretionary powers under these circumstances in order to grant specialist transport.

In addition, the Home to School draft Policy also provides information on eligibility of transport provision for:

1. learners aged 16-19 years in further education and training.
2. continuing learners with a learning difficulty an/or disability aged 19 or over.

Disability, EHCP and SEND

Current policy states the following with respect to EHCP:

“Section 39 of the Children and Families Act 2014 governs the naming of a school in a child/young person’s EHCP. Parents/carers have the right to ask for a particular school to be named in their child/young person’s EHCP and the LA must name that school in the plan unless it would be unsuitable for the child/young person’s age, ability, aptitude, special educational needs, or incompatible with efficient education of others, or the efficient use of resources.

Where a parent would prefer their child/young people to attend a school that is further away from their home address than the nearest school that would be able to meet their needs, the LA will consider whether arranging home to school transport to the preferred school would be incompatible with the efficient use of resources.

If the LA determines that providing transport to the parent/carer's preferred school would be incompatible with the efficient use of resources, the Local Authority may name the parents/carer's preferred school on the condition that the parent/carer arranges the travel or provides some or all of the cost of the travel."

RMBC are satisfied that this measure mitigates any potential negative equalities impacts, balances the need for efficiency in resources and helps parents/carers make informed decisions.

Section 6.2 provides detail on disabled person's passes, which may be available to some Rotherham residents, including severely disabled children who cannot travel alone; this offer may also extend to the care giver, subject to eligibility requirements. The Home to School draft Policy directs people to the relevant links.

Civil partnership/marriage

The Home to School Policy considers circumstances where a child is resident at two separate addresses:

"The home address is considered to be the one where the child/young person resides with their primary parent/carer, and where the child benefit monies are paid to, or where the young person is registered on the electoral register. Where parents do not live together, and the child spends part of the week with each parent, the LA will not provide transport assistance to and from two separate addresses."

Does your Policy/Service present any problems or barriers to communities or Groups?

The primary barrier identified is regarding accessibility for those with EAL. However, the strap line at the beginning of Policy signposts readers to request for a copy of the policy to be made available in a specific language. The use of CoPilot AI has been identified as a source which would be able to assist if such a request for this service is received.

Otherwise, with respect to the protected characteristics outlined in the Equality Act 2010, there are no discernible problem or barriers to particular individuals, communities or groups.

Does the Service/Policy provide any positive impact/s including improvements or remove barriers?

As detailed previously, the Home to School Policy makes specific provision for age and disability, the respective protected characteristics most impacted by this Policy.

What affect will the Policy/Service have on community relations? (may also need to consider activity which may be perceived as benefiting one group at the expense of another)

No effects on community relations with respect to the Home to School Policy have been identified; it is not anticipated that one group will benefit at the expense of another.

Please list any **actions and targets** that need to be taken as a consequence of this assessment on the action plan below and ensure that they are added into your service plan for monitoring purposes – see page 12 of the Equality Screening and Analysis Guidance.

5. Summary of findings and Equality Analysis Action Plan

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 - See page 11 of the Equality Screening and Analysis guidance

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| Title of analysis: Home to School Policy Review |
| Directorate and service area: Regeneration and Environment – Community Safety and Street Scene |
| Lead Manager: Karen Mudford |
| Summary of findings: |
| <p>Overall, the findings have revealed that the Home to School Policy Review and all of its associated stages are compliant with the Equality Act 2010. The main protected characteristics considered in this Equality Analysis have been age and disability, with the Policy containing specific provisions to address each group.</p> <p>With respect to age, it is noted that the concentration of young people varies significantly by council ward whilst, with respect to disability, the number of children/young people with profound and multiple learning difficulties is relatively high. This raises questions regarding ensuring that support provided by current transport providers and RMBC is adequate and tailored to specific needs.</p> <p>The main area for improvement is ensuring provision for those who have EAL, including children/young people and parents/guardians. Whilst there is a reference to EAL support within the body of the Policy, RMBC need to ensure informed consent between each relevant stakeholder regarding the specifics of the Policy, and the intention is to have translated versions of policy available on-line in the near future.</p> |

| Action/Target | State Protected Characteristics as listed below | Target date (MM/YY) |
|--|---|---------------------|
| Liaise with Comms/with AI Copilot to ensure adequate EAL provision | RE/O | 05/2025 |

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

| 6. Governance, ownership and approval | | |
|--|---|------------|
| Please state those that have approved the Equality Analysis. Approval should be obtained by the Director and approval sought from DLT and the relevant Cabinet Member. | | |
| Name | Job title | Date |
| Elise Saxton | Transport Business and Projects Manager | 24/04/2025 |

| 7. Publishing | |
|---|------------------------------|
| The Equality Analysis will act as evidence that due regard to equality and diversity has been given. | |
| If this Equality Analysis relates to a Cabinet, key delegated officer decision, Council, other committee or a significant operational decision a copy of the completed document should be attached as an appendix and published alongside the relevant report. | |
| A copy should also be sent to equality@rotherham.gov.uk For record keeping purposes it will be kept on file and also published on the Council's Equality and Diversity Internet page. | |
| Date Equality Analysis completed | 24/04/2025 |
| Report title and date | Home to School Policy Review |
| Date report sent for publication | May 2025 |
| Date Equality Analysis sent to Performance, Intelligence and Improvement equality@rotherham.gov.uk | 25/04/2025 |

