Impact Assessment

Step 1: Screening for relevance

Name of a policy / procedure / function / project / decision: **Date: April -July 2011**	**Home to School Transport**
Lead Officer:	**Head of Strategic Support**
External Challenger:	**Equality & Diversity Manager**
Other members of team undertaking Impact Assessment:	Policy Manager, Strategic Planning Manager, Group Solicitor for People's, Public Transport Manager, SEN & Support Development Officer, Specialist Transport Manager, Senior Manager Commissioning, Senior Accountancy Officer, Change & Partnership Coordinator

Main aims, purpose and outcomes and how does it fit in with the wider aims of the organisation:

A review of the current children and young people's transport policies to determine if services can be provided in a more efficient and cost efective way as part of the Challenge Session process. Possible option proposals include the withdrawal of discretionary transport services such as denominational and post 16 transport . Consideration has been taken of the Department for Education's announcement that, from September 2011, the Goverment will introduce a new £180m,16-19 Bursary Fund, which will enable schools and colleges to target support to those young people facing greatest financial barriers to participation. The new scheme, unlike the existing discretionary learner support funding, will have the flexibility to allow for transport costs where schools and colleges identify this as a barrier to individual students' participation.

The proposal is as follows;

- to withdraw subsidised denominational transport for pupils with effect from September 2012
- to withdraw subsidised post 16 transport for pupils with effect from September 2012

Further information related to the proposal can be found on the Cheshire West and Chester website.

Is the above relevant to equality and diversity? **Yes** √

Exit the process if you answered No to all of the above questions, otherwise please continue.

Step 2: Scoping

What do you already know about the policy (decision etc)**, what are the main issues you need to consider:**

Target group / area	Main issues	Evidence and data currently available	Consultation / involvement carried out	Further information needed to undertake the assessment

| Race and Ethnicity | English as a second language presents barriers to accessing and understanding services and the proposed changes.

Changing residence more frequently may lead to more changes in schools which may lead to more transport implications.

A lack of established support network for newly arrived families in particular. | 3.4% of children attending maintained schools in Cheshire West and Chester (spring 2011 school census) were from ethnic minorities; of the 95.9 % who are white, 0.13 % and 0.10 % were of traveller of Irish heritage and Gypsy Roma respectively.

Outcomes of a consultation exercise May – July 2011. | The Ethnic Minority & Traveller Achievement Service specifically included in the consultation.

Accessible consultation including translation services where requested.

A range of methods utilised (a survey, drop-in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation documentation to the wider communities)

38 of the 555 | - |

			respondents who stated their ethnicity were not White-British. Therefore no statistically robust analysis could be done at a Black & Minority Ethnic (BME) level.	
Disability	The policy with regard to SEN (Special Educational Needs) pupils in both mainstream and post 16 remains unchanged. Ensure consultation is accessible for parents with disabilities and the impact on disabled pupils affected by the change of policy is known and addressed.	Pupil level annual school census SEN data available upon request. Outcomes of a consultation exercise May – July 2011.	Accessible consultation including provision of alternative formats upon request. A range of methods utilised (a survey, drop-in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation	

			documentation to the wider communities) There were no differences in the views of respondents who said they had a disability compared with those who didn't.	
Gender / Gender reassignment	Potential safety issues for children having to make their own way to school independently. For children in the care of the local authority (Looked After Children) the school at which a child is placed by the Council will be deemed the 'nearest suitable school' For school transport purposes irrespective of the Council's normal zoning arrangements in order to provide continuity of	Pupil level annual school census gender data available upon request. Outcomes of a consultation exercise May – July 2011.	A range of methods utilised (a survey, drop-in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation documentation to the wider communities) There were no differences in the views of	

	educational provision for such children. The allocation of school will be reviewed as part of the child's regular Care Plan review.		respondents relating to the gender of their children.
Religion and belief	Families of Church of England or Catholic faith who wish to educate their children at a voluntary aided school may be affected by this proposal if implemented. If implemented, the proposal relating to the subsidy on denominational grounds may impact on the families of the 700+ students currently in receipt of this subsidy. Church of England schools are established to provide an education to those of all faiths and none whilst Roman Catholic schools also have a specific mission to promote the faith. The impacts may be economic and/or social and may	There are currently 151 primary school pupils in receipt of free or subsidised transport on faith grounds and 716 secondary school pupils. Particular areas within the Borough where a significant impact will be are; Ellesmere Port, Winsford, Northwich, Frodsham, Upton, Kingsway, Blacon and Saughall. Outcomes of a consultation exercise May – July 2011	A range of methods utilised (a survey, drop in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation documentation to the wider communities). Roman Catholic respondents were more likely to strongly disagree with Proposal 1 than Church of England

| | limit the ability of parents/carers to access their preferred educational setting.

For those currently in receipt of the subsidy, and particularly where there is more than one child in the family, the economic impact could result in the need to change schools, thereby potentially interrupting learning and impacting on outcomes.

If the proposals were implemented and families decide to move their children to schools close to home, there could be an impact on school places in the aided and non-aided sectors, potentially changing the faith character of schools.

Ensure consultation is as accessible as possible (i.e. Sufficiently long period of time to avoid religious festivals, venue sensitive for the drop-in sessions) | | respondents.

There was no difference in views regarding Proposal 2. | |

Sexual orientation	N/A		

Age
  Children and young people
  Adults
  Younger older people
  Older older people
	For children and young people aged 16-19, if the proposal is implemented, it may present additional financial and practical barriers to accessing education and training and limit future options.
	
	Potential impact on flexibility of parents working hours.
		In February 2011 there were 378 young people who were NEET and a further 423 whose destination was not known to Connexions.
		
		Outcomes of a consultation exercise May – July 2011.
		
		Pupil level annual school census age data available upon request.
			A range of methods utilised (a survey, drop in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation documentation to the wider communities).
			
			Respondents with younger children were more likely to strongly disagree with Proposal 1.
			
			There was no difference in views regarding Proposal 2.

Rural communities	Pupils/students living in rural communities are more likely to be reliant	Some rural schools arrange transport of their own pupils to	A range of methods utilised (a

	on transport assistance provided by the local authority as commercial transport services are not generally available in these areas.	manage the impact of car use around the school gates	survey, drop- in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation documentation to the wider)
Areas of deprivation	Removal of transport assistance may result in increased travel costs for some families of pupils and students, which may disproportionately affect those who are just above the income threshold to receive assistance.	Free transport would continue to be provided to an appropriate qualifying secondary school if it is between 2-6 miles of the home address. This also applies to pupils who are registered at a qualifying school which is between 2 and 15 miles away; and whose parent has expressed a wish, based upon their religious belief, for the child to be provided with education at that school.	A range of methods utilised (a survey, drop in sessions, press releases, consultation documents posted directly to affected families, schools used to distribute consultation documentation to the wider). About 5% of respondents had children eligible for free

		Outcomes of consultation May – July 2011. The percentage of children who would have been able to claim subsidised transport under denominational grounds but currently receive free transport due to low family income is 21%. The percentage of children who would have been able to claim subsidised transport under Post-16 grounds but currently receive free transport due to low family income is 26%.	school meals and about 10% of respondents were in receipt of maximum level of working family tax credit. Almost all these respondents 'strongly disagreed' with both proposals.	

Step 3: Assessing impact and strengthening the policy

Target group / area	Is the policy (function etc.) likely to have an adverse impact on any of the groups? If yes please comment *Please start by considering the aspects bellow* • *Promoting good community relations* • *Safety* • *Environment and access to services* • *Economic well-being*	Are there any particularly positive impacts of the policy (function etc.) on any of the groups you would like to highlight?	Please rate the impact taking into account any measures already in place to reduce the potential impact highlighted in the previous column. **High**-significant potential impact, risk of exposure, history of complaints, no mitigating measures in place or no evidence available, urgent need for consultation with service users, general public, employees **Medium**-some potential impact, some mitigating measures in place but no evidence available how effective they are, would be beneficial to consult with service users, general public etc. but not urgent **Low**-almost bordering with non relevance to the EIA process (heavily legislation led - very little discretion exercised, limited public facing aspect			Future actions that may need to take place to further reduce the impact.
			High	Medium	Low	
Race and Ethnicity *(including Gypsy and Travellers; migrant workers, asylum seekers etc.)*	People who have English as an additional language may have less awareness and understanding of both transport and admission to school policies and therefore increased potential for school placement to have unforeseen transport implications for parents. Changing residence more frequently may lead to more changes in schools which may lead to more	Parents/carers who have not been able to access subsidies relating to their particular choice of school may perceive the proposed alignment of criteria more positively.		√		A range of consultees involved (incl. specific minority groups) Consultation document and associated documentation translated upon request. Accessibility statement within consultation document and a range of consultation methods (written / face to face) utilised If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes

	transcript implications. A lack of established support network for newly arrived families in particular.					a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them. CWaC will support schools and parents looking to develop alternative solutions For example: - Increase collaboration between schools - Setting up walking buses - Car sharing Please refer to the Plan of Engagement table below The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents.
Disability *(defined as: …"someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities)*	For those who have SEN but do not qualify for transport under the SEN policy, the consultation will inform the understanding of any potential impact which will be addressed in the revision of this Impact Assessment prior to the	The policy with regard to SEN pupils in both mainstream and post 16 remains unchanged.		√		A range of consultees involved. Consultation documentation included accessibility statement offering alternative formats and a range of methods (written / face to face) was applied

				√		
	decision making. Accessibility of the consultation process for disabled parents.					Fully accessible venues were used for the drop in sessions If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them. CWaC will support schools and parents looking to develop alternative solutions For example: - Increase collaboration between schools - Setting up walking buses - Car sharing Please refer to the Plan of Engagement table below The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents.
Gender / Gender reassignment	Potential impact on the safety of children having to make their own journeys independently.			√		If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes

						a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them. CWaC will support schools and parents looking to develop alternative solutions For example: - Increase collaboration between schools - Setting up walking buses - Car sharing Please refer to the Plan of Engagement table below The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents.
Religion and belief *(also including a lack of religion or belief)*	Removal of discretionary subsidised transport on denominational grounds will bring eligibility more in line with other transport eligibility criteria. The effect of this is likely to be perceived as adverse or negative by those most directly impacted,	Parents/carers who have not been able to access subsidies relating to their particular choice of school may perceive the proposed alignment of criteria more positively. There will continue to be assistance to those who	√			Integrated Transport Service (ITS) looking to work with bus companies/parents/schools/ local community to broker alternative transport solutions where practicable. Some schools have indicated that they would consider offering assistance with

	particularly if the proposed changes impact on more than one child. The negative or adverse view could be strengthened where parents/carers perceive that the proposal will limit their ability to access a faith-based education for their children, consistent with their personal and family beliefs. Denominational assisted transport policy was introduced in 2008. Those pupils attending school prior to this change receive free transport. The current proposal is to remove all free and subsidised transport from September 2012. Where a pupil attends a school on the grounds of parental religion or belief that is not his or her nearest suitable school, the LA must take the wishes of the parents into account, but is not obliged to provide free home to	qualify under the current hardship criteria in relation to these two policy options. This will enable continued equality and opportunity to access educational provision for those families.				transport for pupils affected by withdrawal of denominational subsidised transport. Transport Unit will assist with brokerage of transport if required. Or help schools/parents set up car sharing schemes Opportunity to develop the travelcard scheme so more young people use public transport services. If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them. CWaC will support schools and parents looking to develop alternative solutions For example: - Increase collaboration between schools - Setting up walking buses - Car sharing Please refer to the Plan of Engagement table below

				√		
	school transport: Section 509AD Education Act 1996. If the proposals are implemented and families decide to move their children to schools close to home, there could be an impact on school places in the aided and non-aided sectors, potentially changing the faith character of schools.					The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents
Sexual orientation	N/A					
Age Children and young people	Withdrawal of Post 16 transport could result in more young people becoming NEET (Not in Employment. Education and Training)	There will continue to be assistance to those who qualify under the current hardship criteria in relation to these two policy options. This will enable continued equality and opportunity to access educational provision for those families.		√		Schools/colleges facilitated by Integrated Transport Service (ITS) may set up their own schemes such as parent bus clubs or car sharing schemes or fund transport from own budgets e.g. Bishop Heber High School and Mid Cheshire, West Cheshire and Reaseheath colleges already contribute, to retain pupil numbers and reduce traffic congestion around the school/college gate. The Borough may be able to offer spare seats on statutory

| | | | | | | school bus services to post 16 pupils attending sixth form at school.

Opportunity to develop the travelcard scheme so more young people use public transport services generally and for travel at weekends.

Materials and 'Train the Trainer' programme developed for schools and colleges to deliver Independent Travel Training for children and young people. If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them.

CWaC will support schools and parents looking to develop alternative solutions For example:
- Increase collaboration between schools
- Setting up walking buses
- Car sharing |

						Please refer to the Plan of Engagement table below The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents.
Adults	Impact on parents / carers access to employment.					
Younger older people						
Older older people						
Rural communities Service availability (access)	Removal of some home to school transport provision could lead to pupils/students living in rural communities having difficulties in accessing, particularly post 16 education as commercial bus services are limited and they may therefore be at higher risk of becoming NEET.	Parents/carers who have not been able to access subsidies relating to their particular choice of school may perceive the proposed alignment of criteria more positively.		√		Buying of spare seats on statutory school bus services. If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them. CWaC will support schools and parents looking to develop alternative solutions For example:

						- Increase collaboration between schools - Setting up walking buses - Car sharing Please refer to the Plan of Engagement table below The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents.
Cost of service delivery and costs to community to access the service	There is likely to be an impact on travel costs potentially for some service users, the extent of which will be informed by the consultation.			√		
Impact on quality and character of the natural rural landscape and residents	-					
Impact on people wishing to visit the countryside	-					
Areas of deprivation	Removal of transport assistance may result in increased travel costs for some families of pupils	There will continue to be assistance to those who qualify under the current hardship criteria in relation		√		If implemented, the proposals would not come into effect until September 2012 allowing those affected by the changes

	and students, which may disproportionately affect those who are just above the income threshold to receive assistance.	to these two policy options. This will enable continued equality and opportunity to access educational provision for those families.			a 12 month period to take stock of the options available to them and to understand alternatives that may be available to them. CWaC will support schools and parents looking to develop alternative solutions For example: - Increase collaboration between schools - Setting up walking buses - Car sharing Please refer to the Plan of Engagement table below The Council's Spare seat policy as well as the Cycling allowance currently offered by the School transport policy, can be taken full advantage of by the affected parents.
Human rights	Where the LA is determining its policy on discretionary provision it should do so rationally and having taken account of all relevant factors including, but not limited to, faith, social, economic, safety, environmental, school/college	Denominational transport charges are lower than non denomination transport charges therefore subsidy is higher (despite often much longer journeys).	**No Rating Needed**		

	admissions, freedom of choice and moral factors. Where the LA decides to tighten or remove a discretionary provision, it should allow scope for individual circumstances to be examined and provision made if warranted. This is currently afforded by the policy maintaining discretionary provision for prescribed exceptional circumstances e.g. for looked after children and those with medical problems etc, and a right of appeal against a decision to provide discretionary transport, currently referred to the Appeals Committee. It is important the same or similar safeguards are maintained. Adopting the proposal would not of itself be a violation of the protections contained in the Human Rights Act so long as the processes outlined in this paragraph enable individual rational evaluation.		

Step 4: Health and wellbeing

	Race and Ethnicity	Disability	Gender / Gender reassignment	Religion and belief	Sexual orientation	Rural communities	Areas of deprivation	Age
Is the policy (function etc.) likely to have the potential to impact on human health (pls. comment). If yes please specify.	*There is a potential that for some pupils/young people the proposed policy changes could have a positive impact with increased physical activity i.e. walking all or part of the way to school/college. It is recognised that this will not be appropriate/possible for all of those pupils/young people and will need to be appropriate to each individual's situation.*							
Will there be a significant impact on any of the following lifestyle related variables? Pls. comment	**Physical activity –** changes to eligibility for free or assisted school transport may result in more pupils walking all or part of the way to school/college							
	Smoking, Drugs or alcohol use - none							
	Sexual behaviour - none							
	Accidents and stress at home or work potential financial and logistical stress (parents) *Stress and increased anxiety caused by disruptions to pupils (change of a school) particularly in key exam years.*							
	Diet none							
Is there likely to be a significant demand on any of the following health and social care services?	**Social services Primary care -** none							
	Community services - none							
	Primary / hospital care/ A&E / Need for medicines etc. -none							

Step 5: Procurement and partnership

Is this project due to be carried out wholly or partly by contractors?	N
If yes, what steps did you take to ensure that any partner organisation you work with complies with equality and human rights legislation, specifically in relation to:	
• tendering and specifications	
• awards process	
• contract clauses	
• monitoring and performance measures	

Step 6: Making a decision and actions

What practical actions do you recommend to reduce, justify or remove any adverse/negative impact?
Reflect these actions in the E&D part of the Directorate Business plans.

Action	Lead Officer	Deadline
Full Consultation process with children, young people, parents, schools, colleges, etc	Carly Brown	3 July 2011
Finalising the Equality Impact Assessment following the end of the consultation period.	Carly Brown	3 July 2011
Please refer to the Plan of Engagement table below For schools and parents to explore alternative options, the contact details for the Integrated Transport Service (ITS) is: School Transport, Integrated Transport Service, Rivacre Business Centre, Ellesmere Port, Cheshire, CH66 3TL or email schooltransportenquiries@cheshirewestandchester.gov.uk or telephone 0300 1237039.	ITS (Integrated Transport Service)	July 2011

Integrated Transport Service will facilitate the sharing of best practice for parent/school clubs and support schools to manage their own bus contracts	ITS (Integrated Transport Service)	July 2011 - September 2012
Integrated Transport Service will provide a brokerage service to procure and manage transport provision on behalf of schools/colleges	ITS (Integrated Transport Service)	July 2011 - September 2012
Integrated Transport Service will provide an Independent Travel Training Programme in collaboration with other internal providers, including "Train the Trainer" trainers, journey plans, training manual and standardisation of procedures	ITS (Integrated Transport Service)	July 2011 - September 2012

Step 7: Monitoring and review

How will you monitor the impact and effectiveness of this policy (function etc.)?	Review any changes to admissions and/or increase in the number of appeals
Next review of the policy (function etc.)	1 year after implementation September 2013

Step 8 Signing off; Overview and Scrutiny involvement; Publishing

Lead Officer:		
Approved by Head of Service:	Carly Brown	
Overview and Scrutiny involvement		
Date:		
Comments / Actions emerging from challenge session	Lead Officer	Deadline

All Impact Assessments are publicly available from a designated area of the Council's website, please forward the completed EIA to the Equality and Diversity Managers for publishing.

Plan of Engagement				
Work area	**Detail**	**Timeline**	**Action By**	**Notes**
Update existing Service Level Agreements	Set up meetings with colleges who already provide financial support for their students through Service Level Agreements with the Integrated Transport Service (ITS). Establish the level of support they wish to offer students in future and whether they wish to continue with the SLA's in place. Some colleges who already operate their own transport may wish to extend this provision themselves in-house.	September 2011-March 2012	Integrated transport service (ITS) and colleges in scheme	Decision required prior to colleges setting their budgets
Transport Seminars	Provide training through seminars for schools/colleges/operators on sustainable solutions. Seminars will cover the setting up and administering of parent bus clubs, developing car sharing schemes, tendering and procurement, the role of the commercial operator, Independent travel training, travel planning, utilisation of in-house fleet services, collaboration between schools to reduce transport costs by adjusting the times of the school day.	January 2012-March 2012	ITS, Schools, Colleges, Operators,	
Partnership working with local operators	Continue to work in partnership with local operators to find ticketing solutions, identify market awareness and opportunities/solutions	ongoing	ITS, Operators	
Pupil Focus Groups	Facilitate focus groups in school with pupils to establish their travel plans. Continue to explore and encourage other sustainable solutions such as car sharing schemes for schools/colleges.	March 2012-July 2012	Schools, ITS	

Brokering Service	Provide a brokering and support function offering tendering facilities for schools/ colleges or parent groups to ensure best market prices are obtained and safeguarding standards are maintained.	January 2012 - May 2012	Schools, Colleges, Parents, ITS	Procurement arrangements determine timescale
Yellow Bus Scheme	Co-ordinate the yellow minibus community loan schemes for schools to cut congestion around school at peak times - Procurement, initial meetings, award of minibus, ongoing support and monitoring.	September 2011-July 2012	ITS, Schools	Subject to funding being available from the sustainable travel funds
Off-site travel provision	Continue to work with schools and colleges to provide a brokering service for schools/colleges for diploma and other courses requiring travel off-site.	January 2012 - May 2012	ITS, Schools	Procurement arrangements determine timescale
Fleet	Provide schools with support and direction on how to use the in-house fleet services where appropriate.	ongoing	Schools, ITS	

Independent travel training	Provide independent travel training for pupils as required.	ongoing	Schools/ITS	Subject to funding being available from the sustainable travel funds
Journey planner	Provide a self serve on-line school based electronic journey planning to promote green travel to school. This will provide details on bus routes/timetables, but also crossing points etc for pedestrians.	ongoing	ITS	
Information	Provide information to schools and colleges on travel options that are available to them. Facilitate the promotion of these options by offering some design support on publicity in the form of leaflets/maps.	September 2011 -	ITS, Schools	
Car sharing Scheme	Help schools to develop car sharing schemes to provide reduced travel costs, improved access for areas no longer served by bus services and reduce traffic congestion around the school/college gate.			Explore school options with "Liftshare" who currently provide support to the CWAC car sharing scheme.

Walking and Cycling	Provide advice on road safety in schools to promote safe walking and cycling.	available	ITS, Schools	May be subject to funding or in part
Theatre in Education	Continue to co-ordinate Theatre group workshops in schools to help tackle behaviour issues on the journey to and from school.	September 2011 - July 2012	ITS, schools	Subject to funding being available from the sustainable travel funds
	With support also from Children & Young People's Service to assist in the delivery			