

Equality Impact Assessment (EqIA) Template APPENDIX F

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? (Note: ‘proposal’ includes a policy, service, function, strategy, project, procedure, restructure)	Changes to existing policy for Concessionary Travel
Which Directorate / Service has the responsibility for this?	Collections and Housing Benefits - Finance
Name and job title of lead officer	Fern Silverio
Name & contact details of the other person(s) involved in the EqIA:	Bernie Beckett, Adult Services Consultation Manager Tel: 020 8420 9252 Email: bernie.beckett@harrow.gov.uk All members of the Adult Services Steering Group which includes users, carers, representatives from Voluntary Organisations, NHS, Unions and CNWL
Date of assessment:	4.4.11 – Draft Initial Assessment 14.6.11 – Reviewed with comments from Steering Group 29.7.11 – Reviewed 23.8.11 – Review further to outcome of full consultation 19.9.11 – Reviewed further to Steering Group feedback 7. 10.11 - Reviewed with comments from Steering Group

Stage 1: Overview

1. What are the aims, objectives, and desired outcomes of your proposals? (Also explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)	The policy is being changed to ensure that people are able to access a consistent and fair service within the funding available. Develop and implement a Discretionary Freedom Pass Policy Develop and Implement a policy regarding levels of entitlement to different types of concessionary travel.
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	<p>Charge for lost/damaged Freedom Passes that have not been stolen.</p> <p>These proposals have been designed to reduce the overall costs of the service</p>
<p>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<ul style="list-style-type: none"> • Lack of agreement of steering group • Negative feedback from full consultation process • Identified negative impact on individuals • Proposed changes do not benefit council financially
<p>3. How does this contribute to your Directorates Service Plan?</p>	<p>Protecting vulnerable people</p>
<p>4. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>Users of the Discretionary Freedom Pass, Taxicard and Freedom Pass.</p>
<p>5. Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? 	<p>No but aspects of concessionary travel are shared with the London Councils and Transport for London</p> <p>Councillors will make the final decision on whether the policy is implemented</p>
<p>5A. How are/will they be involved in this assessment?</p>	<p>A Steering Group has been developed, including representatives from Voluntary Organisations, users, carers, NHS, Unions and CNWL which oversees the consultation including the development of the Equality Impact Assessments.</p> <p>London Councils and Transport for London are being advised of general feedback relating to their policies in relation to concessionary travel.</p>
<p>Stage 2: Monitoring / Collecting Evidence / Data</p>	
<p>6. What information is available to assess the impact of your proposals (<i>include the actual data, statistics and evidence</i>)? List the main sources of data, research and other sources of evidence (including full references) reviewed to determine impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research</p>	

interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc

(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)

Age (including carers of young/older people)	<p>Benchmarking from other London Authorities</p> <p>Profile of the users of the service</p> <p>Complaints and compliments</p> <p>Analysis of data from National Disabled pass review</p> <p>Analysis of sample data regarding the issue of the Discretionary Freedom Pass review.</p>
Disability (including carers of disabled people)	<p>MIND and Harrow user group conducted a survey on the impact on those people who could lose the discretionary Freedom Pass and held a consultation event for people with mental health problems.</p>
Gender Reassignment	<p>As above</p>
Marriage / Civil Partnership	<p>Information not collected</p>
Pregnancy and Maternity	<p>Information not collected</p>
Race	<p>Benchmarking from other London Authorities</p> <p>Profile of the users of the service</p> <p>Complaints and compliments</p> <p>Analysis of data from National Disabled pass review</p> <p>Analysis of sample data regarding the issue of the Discretionary Freedom Pass review.</p>
Religion and Belief	<p>As above</p>

Sex / Gender	As above			
Sexual Orientation	As above			
7. Do you need to collect any additional data to be able to monitor the impact on different groups?	No			
8. Are there any other local/regional/national data sources that can inform this assessment if you have insufficient data on any of the groups?	Benchmarking			
9. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)	Yes	x	No	
Who was consulted?	What consultation methods were used?	What did you learn from your consultation?	What do the results show about the impact on different equality groups (protected characteristics)?	
People living and working in Harrow, Users of the Services, Voluntary Organisations, Carers, NHS, Unions, Staff	<p>Pre consultation included IPSOS Mori survey of all users of adult social care and a sample of carers approx 7000 Face to face meetings with over 700 people Pre consultation document sent to over 10000 people with opportunity to feed back through feedback form, email, telephone and freepost address</p> <p>Full consultation included the circulation of a full consultation document and draft Fairer Contributions Policy to over</p>	<p>Some current users of the Discretionary Freedom Pass and Taxicard will not be eligible if the new criteria is introduced</p> <p>People with mental health needs who currently have a Discretionary Freedom Pass may not be eligible if the proposals are agreed</p> <p>People with Autism and Aspergers have concerns that new criteria will limit their transport options</p> <p>People who do not drive or who are unable to use public transport because of disability or illness may be adversely affected by reduction in Taxicard trips</p> <p>Young people using the Taxicard for socialising in the evening and older people for going to lunch clubs or other community activities during the day</p>		

	<p>10,000 people with opportunity to feed back through feedback forms, emails, telephone and freepost address.</p> <p>Easy read documents and a DVD were developed</p> <p>Documents were circulated in translated formats as required</p> <p>Face to face meetings with 700+ people</p> <p>Meals on Wheels Survey</p> <p>Face to Face meetings with some meals on wheels users</p>	<p>Charging for lost/damaged Freedom Passes could impact users of the service who have low incomes</p>
<p>Specific feedback from MIND in Harrow</p>	<p>MIND and Harrow user group conducted a survey on the impact on those people who could lose the discretionary Freedom Pass and held a consultation event for people with mental health problems.</p>	<p>Discretionary Freedom Pass is as essential to mental health service users as any other day support, which has been the overwhelming feedback during the pre-consultation and 12 week consultation periods. Withdrawal of the Discretionary Freedom Pass will have a devastating impact for those who use it as a lifeline to prevent acute isolation.</p> <p>Mind in Harrow and Harrow User Group (HUG) have also conducted a survey on the impact on mental health service users of loss of the Discretionary Freedom Pass on each aspect of their lives stated in the draft eligibility criteria. We have received 137 completed surveys. In summary, the results are:</p> <ul style="list-style-type: none"> • An average of 90% reported that loss of the Discretionary Pass would 'Make it more difficult' or 'Make it impossible' for them to pursue therapeutic activities (eg "To pursue volunteering or employment opportunities, To take up training and/or educational opportunities, To maintain contacts with friends and family or other social network") • Of those that did not report a negative impact, 4% did not have a Discretionary Pass and 3 other respondents appear to have misunderstood this question as their other feedback indicate an

		<p>negative impact, for example <i>“It is important to have a freedom pass to get out of the house and not feel isolated.”</i></p> <p>Demographics of completed surveys</p> <ul style="list-style-type: none"> • 99% self reported ‘current mental health service users’ • 56% female, 44% male • 61% White British, 29% Asian or Asian British, 8% Black or Black British, 2% Mixed parentage • 9% 21-35, 42% 35-50, 37% 51-65, 10% 66+
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NOTE: If you have not undertaken any consultation as yet, you need to consider if you need to carry out any consultation. For example, if you have insufficient data/information for any equality group and you are **unable** to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be **completed before** progressing with the rest of the EqlA.

Guidance on consultation/community involvement toolkit can be accessed via the link below

http://harrowhub/info/200195/consultation/169/community_involvement_toolkit

10. If you have not undertaken any consultation, explain why?

N/A

Stage 3: Assessing Impact and Analysis

11. What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact? How likely is this to happen? How will you mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)		x	Users of Discretionary Freedom Passes below Pensionable age may be impacted if they are assessed as no longer eligible	The proposed Eligibility Criteria has been developed in partnership with MIND and the Social Care Action Group within the consultation period. The proposed criteria was developed as a result of feedback to the pre consultation to ensure those in most need are eligible for the Discretionary Freedom Pass

			Young people using the Taxicard for socialising in the evening and older people for going to lunch clubs or other community activities during the day	The proposals relating to taxicard usage have been changed to give more trips
Disability (including carers of disabled people)		x	<p>Users of the Discretionary Freedom Passes who do not fall within the criteria to access a National Disabled Pass may be impacted if they are assessed as no longer eligible.</p> <p>People with disabilities that currently have Blue Badges and full Taxicard trips however are reliant on carers driving may be impacted by having a reduction in Taxicard trips</p>	<p>The proposed Eligibility Criteria has been developed in partnership with MIND and the Social Care Action Group within the consultation period. The proposed criteria was developed as a result of feedback to the pre consultation to ensure those in most need are eligible for the Discretionary Freedom Pass</p> <p>The proposed recommendations now include additional Taxicard trips for users who also have a Blue Badge or Freedom Pass</p>
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual Orientation				

Other (please state)	x	People with mental health needs who currently have a Discretionary Pass and do not fall within the proposed criteria may not have access to a Discretionary Pass in the future.	The proposed Eligibility Criteria has been developed in partnership with MIND and the Social Care Action Group within the consultation period. The proposed criteria was developed as a result of feedback to the pre consultation to ensure those in most need are eligible for the Discretionary Freedom Pass
	x	People with Autism and Aspergers have concerns that new criteria will limit their transport option	Research will be carried out to identify whether people with Autism and Aspergers meet the criteria for a National Disabled Freedom Pass
	x	Charging for lost/damaged freedom passes could impact users of the service who have low incomes	Monitoring will be put in place.

12. Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.

Example:

A local authority is making changes to four different policies. These are funding and delivering social care, day care, respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people's participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.

Adult Services is carrying out a consultation which include proposed changes to the Contributions Policy, Adult Social Care Transport, Concessionary travel and the costs of Meals on Wheels.

For users of more than one service there may well be a cumulative impact i.e. if somebody attends a day centre, uses a Discretionary Freedom Pass and has a support package, following a financial assessment they may be asked to contribute to the total cost of that care package and undergo an assessment for the Discretionary Freedom Pass.

The cumulative impact could affect users and carers from all Client Groups using Adult Care Services:
People with mental health needs
People with learning disabilities
People with physical disabilities
Elderly people

The impact of the changes to Concessionary Travel could also affect non users of Adult Care Services particularly people with mental health needs and people who are disabled who have a Taxicard.

13. How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and promote good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Equality Group	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	What actions can you take to meet these requirements? (Also include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	<p>The council will ensure that people who meet the eligibility criteria are able to access concessionary travel</p> <p>Taxi card proposals have changed to address the impact on young people and older people</p>	<p>We will monitor feedback from users of concessionary travel on a continued basis</p> <p>As above</p>	<p>The consultation process has allowed us to ensure that all groups are given the opportunity to give their views</p>	<p>Continued monitoring of the service</p> <p>Communications campaign to ensure the community are aware of changes, how to access concessionary travel and the eligibility criteria for all passes</p>
Disability (including carers of disabled people)	<p>The council will ensure that people who meet the eligibility criteria are able to access concessionary travel</p>	<p>We will monitor feedback from users of concessionary travel on a continued basis</p>	<p>The consultation process has allowed us to ensure that all groups are given the opportunity to give their views</p>	<p>Continued monitoring of the service</p> <p>Communications campaign to ensure the community are aware of changes, how to access concessionary travel and the eligibility criteria for all passes. Information will be</p>

				<p>made available in required formats.</p> <p>Introduce new assessment form for concessionary travel developed in partnership with MIND and social care action group.</p> <p>Ensure that staff are trained in how to use new assessment form and apply eligibility criteria. This would apply to both council staff and any contractors.</p>
Gender Reassignment	Monitoring information not available however monitoring information will be kept for all future service users			
Marriage and Civil Partnership	Monitoring information not available however monitoring information will be kept for all future service users			
Pregnancy and Maternity	Monitoring information not available however monitoring information will be kept for all future service users			
Race	The council will ensure that people who meet the eligibility criteria are able to access concessionary travel			<p>Continued monitoring of the service</p> <p>Communications campaign to ensure the community are</p>

					aware of changes, how to access concessionary travel and the eligibility criteria for all passes. Information will be made available in required formats
Religion or Belief	Monitoring information not available for eligibility to Discretionary Freedom Pass however monitoring information will be kept for all future service users				
Sex	Monitoring information not available for eligibility to Discretionary Freedom Pass however monitoring information will be kept for all future service users				
Sexual Orientation	Monitoring information not available however monitoring information will be kept for all future service users				

14. Is there any evidence or concern that **direct or indirect discrimination** may occur with reference to anti discrimination legislation?

Direct discrimination - occurs when a person is treated less favourably than others on the grounds of their age, disability, gender, race, religion or belief, or sexual orientation. Refer to main guidelines and toolkit for examples of direct discrimination.

Indirect discrimination - occurs when a rule, condition or requirement, which applies equally to everyone, has a disproportionately adverse effect on people from a particular equalities group when there is no objective justification for the rule. Refer to main guidelines and toolkit for examples of indirect discrimination.

	Age (including	Disability (including	Gender Reassignme	Marriage and Civil	Pregnancy and	Race	Religion and Belief	Sex	Sexual Orientation
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		carers)	carers)	nt	Partnership	Maternity					
Direct	Yes										
	No	x	x	x	x	x	x	x	x	x	x
Indirect	Yes	x	x								
	No			x	x	x	x	x	x	x	x

If you have answered 'yes' to any of the above you need to stop and rethink and should not proceed with your proposals. (You are also encouraged to seek Legal Advice)

Stage 4: Decision

15. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: when the EqIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality are being addressed.	
Outcome 2 – Adjustments to remove adverse identified by the EqIA or to better promote equality. List the actions you propose to take to address this in the Improvement Action Plan at Stage 5	x
Outcome 3 – Continue with proposals despite having identified some potential for adverse impact or missed opportunities to promote equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the impact. (explain this in 15A below)	
Outcome 4 – Stop and rethink: when your EqIA shows actual or potential unlawful discrimination. (You are also encouraged to seek Legal Advice)	

15A. If your EqIA is assessed as outcome 3 , explain your justification with full reasoning to continue with your proposals?	Impacts will be presented to Cabinet to support the decision making process
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Stage 5: Making Adjustments (Improvement Action Plan)

16. List below any actions you plan to take as a result of this impact assessment. This will include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Lead Officer	Timescale	Resource implication	Progress
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<p>If the eligibility criteria is implemented the number of users of the service will reduce.</p>	<p>Monitoring arrangements will be put in place that include service users with Autism and Aspergers who are subsequently denied a Discretionary Freedom Pass.</p> <p>The Steering Group, with the existing composition, will continue to operate, in collaboration with partners to assess impacts on people who have had the Discretionary Freedom Pass withdrawn.</p> <p>Introduce new assessment form for concessionary travel developed in partnership with MIND and social care action group.</p> <p>Ensure that staff are trained in how to use new assessment form and apply eligibility criteria. This would apply to both council staff and any contractors.</p>	<p>Fern Silverio</p>	<p>This will be up to members but a timescale of 1/11/11 is being proposed for new applications and a date of 1/4/12 for cancelling any existing cases that do not qualify under new policy criteria. This will provide a long lead in period and allow for a communication plan to be implemented to inform all affected</p>	<p>Review to be done by contractors at a cost of approx £30k</p>	<p>Would need to commence asap post Members decision in October</p>
<p>The taxicard proposals have been changed to address the impact on</p>	<p>Monitoring arrangements will be put in place.</p>	<p>Fern Silverio</p>	<p>To effect new trip bands by 1/4/2011 which would allow</p>	<p>Access Harrow staff and contractor</p>	<p>Would need to commence asap post Members decision in</p>

young and older people however the numbers proposed are less than the present number of taxicard trips received by users.	The Steering Group will continue to operate to monitor implementation of any changes and ongoing impacts of changes.		time to inform all affected Would also need to cross reference all holders of taxi cards with holders of DFP so customer can decide which one they need to keep from 1/4/2012		October
Communicating changes to users	Action plan to be put together with comms	Fern Silverio	November 2011 – March 2012	Key officers, comms and London Councils re taxi card scheme	Would need to commence asap post Members decision in October

Stage 6 - Monitoring

The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

17. How will you monitor the impact of the proposals once they have been implemented? How often will you do this?	Monitoring and implementation arrangements are being agreed with the Steering Group who will continue to meet on an ongoing basis to monitor implementation and impacts. Also Service area, AH, would actively monitor customer feedback and complaints. Press articles and general feedback from residents would also be monitored on an on-going basis
18. What monitoring measures need to be introduced to ensure effective monitoring of the policy? (Also Include in Improvement Action Plan at Stage 5)	This is already covered by complaints process. However, we would also monitor residents views via caseload statistics, complaints to voluntary groups and third sector so a more wholistic view is captured
19. How will the results of any monitoring be analysed, reported and publicised?	To be decided but likely to involve interim report to steering group and ultimately to refer matter back to CSB & cabinet

20. Have you received any complaints or compliments about the policy, service, function, project or decision being assessed? If so, provide details.

As part of the consultation and already fed into this document

Stage 7 – Reporting outcomes

The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqlA's will also be published on the Council's website and made available to members of the public on request.

21. Summary of the assessment

NOTE: This section can also be used in your Cabinet reports etc but you must ALSO attach the full EqIA to the report

- What are the key impacts – both adverse and positive?
- What course of action are you advising as a result of this EqIA?
- Are there any particular groups affected more than others?
- Do you suggest to proceeding with your proposals although an adverse impact has been identified?

The key impacts that have been identified are:

- Some current users will not be eligible if the new criteria is introduced
- People with mental health needs who currently have a Discretionary Freedom Pass may not be eligible if the proposals are agreed
- People with Autism and Aspergers have concerns that new criteria will limit their transport options
- People who do not drive or who are unable to drive or who are unable to use public transport because of disability or illness may be adversely affected by reduction in Taxicard trips
- Young people who use the Taxicard to attend clubs in the evening and older people who use the Taxicard to go to lunch clubs etc during the day may be adversely affected by reduction in Taxicard trips
- Charging for lost/damaged freedom passes could impact users of the service who have low incomes

As a result of the consultation activity changes have been made to the recommendations which include:

- Increase in Taxicard trips for people who have a Freedom Pass and Blue Badge

Implementation and Monitoring arrangements have been developed in partnership with the Steering Group. The Steering Group will continue to operate to monitor the implementation of changes and will carry out an ongoing monitoring role.

22. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc

The Equality Impact Assessment will be publicised on the Council Website and has been developed in partnership with the Steering Group.

Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

23. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	The Adults Consultation Steering Group were responsible for developing the EqIA in partnership with the Council.		
Signed: (Lead officer completing EqIA)	Carol Yarde	Signed: (Chair of DETG)	14 October 2011
Date:	Carol Yarde	Date:	14 October 2011