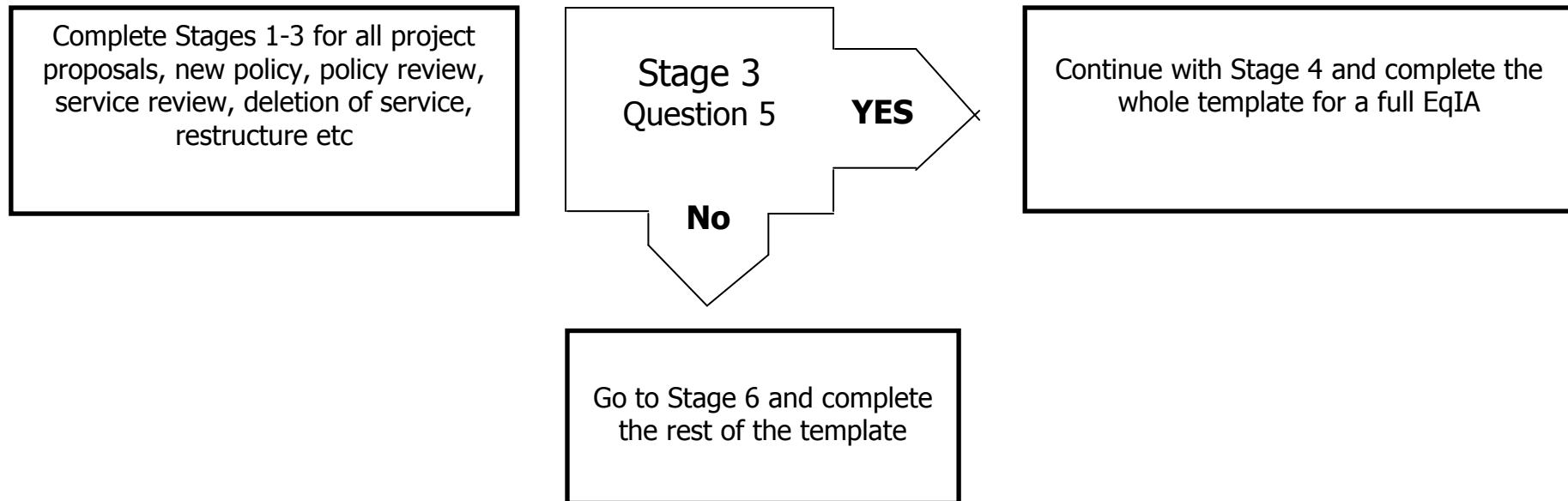


Appendix 1

Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process (EqIA). There is now just one Template. Lead Officers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- SIGN OFF: All EqIAs need to be signed off by your Directorate Equality Task Groups.
- Legal will NOT accept any report without a fully completed, Quality Assured and signed off EqIA.
- The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

Equality Impact Assessment (EqIA) Template

Type of Decision: Tick ✓	✓	Cabinet		Portfolio Holder		Other (explain)	
Date decision to be taken:	15 th September 2016						
Value of savings to be made (if applicable):	MTF saving £257k 2016-17						
Title of Project:	Travel Assistance Policy for Children and Young People (0-25) living in Harrow (for Education Purposes)						
Directorate / Service responsible:	People Directorate/Special Educational Needs						
Name and job title of Lead Officer:	Chris Spencer, Director People Services						
Name & contact details of the other persons involved in the assessment:	<p>Patrick O'Dwyer, Divisional Director Education Services: 020 8736 6514 – Patrick.odwyer@harrow.gov.uk</p> <p>Pauline Nixon, People Service Consultant – Pauline.nixon@harrow.gov.uk</p> <p>Carole Wells, Service Manager, SEN Assessment & Review: 020 8966 6337 – carole.wells@harrow.gov.uk</p> <p>Kim Chilvers, Commissioner: 020 8736 6292 – kim.chilvers@harrow.gov.uk</p>						
Date of assessment (including review dates):							

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain your proposals here e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>The Travel Assistance Policy sets out how, and under which circumstances, the London Borough of Harrow (the Council) will provide travel assistance to all eligible children and young adults (0-25) for educational purposes. It outlines the responsibilities that parents/carers, children and young people and the Council have in this process.</p> <p>There are two key principles which underpin the Council's approach to providing travel assistance:</p> <ul style="list-style-type: none"> • Promoting independence from an early age through to adult life • Maintaining quality of life <p>Eligible children include those who are placed in a school over the statutory distance which is 2 miles for infant aged children and 3 miles for junior, and secondary aged children plus those with a disability.</p> <p>Although there has been no legislative change to the school transport and associated duties retained by the Local Authority since the 1996 Education Act (updated in 2007),</p>
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the Council needs to review the existing policy in line with the significant changes to the SEN and Disability legislation as well as the significant budget pressures on the service.

Children and young people with SEN and disability are the main users of transport to school.

The proposed new policy provides clarity regarding:

- The Council's statutory responsibilities for providing travel assistance to children and young people aged 0-25
- The type of travel assistance which will increase and include the offer of a mileage allowance to parents/carers
- The Council's discretionary duties affecting under 5 year olds - in all but exceptional circumstances this will no longer be provided
- The responsibility of parents and carers to get their children to school
- The duty to promote sustainable travel whilst promoting independence from an early age through to adult life and maintaining quality of life for those eligible children and young people
- A more rigorous process for parent/carers to apply annually for travel assistance
- A robust appeals process if parents/carers think we have got it wrong.

Savings Proposal:

The 2016-17 revenue budget for SEN Transport is £3.04m. This includes a reduction of £257k of a total saving of £514k. The remainder of the saving of £257k will be deducted from the budget in 2017-18 making the total budget available £2.78m at the end of the current MTFS period.

Any savings resulting from the outcome of this consultation will be factored into future forecasts as and when they materialise. There is the potential to make financial

	savings but it is not possible to predict the exact amount as the population and complexities of those accessing Travel Assistance changes and will impact on this.					
2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Service Users	✓	Partners	✓	Stakeholders	✓
	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	✓
	Sexual Orientation		Other			
3. Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	<p>Adult social care transition team provides funding for young people's travel assistance once they reach 21 years old.</p> <p>Community services are the provider of transport used by Children's services. They currently identify the type of transport to be used once commissioned to provide it.</p> <p>The overall responsibility for funding and agreeing travel assistance rests with Children's services (People) for those aged 0-21 and in partnership with Adults social care (People) from 21 plus.</p>					
Stage 2: Evidence & Data Analysis						
<p>4. What evidence is available to assess the potential impact of your proposals? This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.</p> <p>(Where you have gaps (data is not available/being collated for any Protected Characteristic), you should include this as an action to address in your Improvement Action Plan at Stage 6)</p>						

Protected Characteristic	Evidence	Analysis & Impact
Age (including carers of young/older people)	As of June 2016 the use for children and young people with SEND is broken down as: Age 0-4 (13) age 5-11 (260) age 12-16 (209) age 17-19 (84) age 20-25 (41) Total 607 data from SEN Transport services	All service users are children and young people aged 0-25. All have a special educational need and/or disability As the proposal will review discretionary use of transport and consider alternative options, there is potential for an adverse impact on this group
Disability (including carers of disabled people)	All service users have a special educational need/disability	There is potential for an adverse impact on some children and young people in this group if they have been receiving transport as discretionary users rather than statutory e.g under 5s and some over 19 year olds
Gender Reassignment	At present none of the service users are recorded as having undergone gender reassignment	It is unlikely that this proposal will impact on this group
Marriage / Civil Partnership	At present none of the service users are recorded as being in a marriage or civil partnership	It is unlikely that this proposal will impact on this group
Pregnancy and Maternity	At present none of the service users are recorded as being in a marriage or civil partnership or pregnant	It is unlikely that this proposal will impact on this group
Race	Data from Harrow's four special schools (which have the highest percentage of users of SEN Transport) indicate that 20% of the population is from an Asian other background, 19% are Indian and 16% are white British and 11% are black African.	These groups make up two thirds of the population who use SEN Transport. The consultation respondents were similarly represented
Religion and Belief	Christianity (all) was the highest group responding to the consultation, 11 respondents (35 %), followed by Hinduism 6 respondents (19 %). Data on child's religion is not available.	

Sex / Gender	Boys are over represented in special education provision (66%) to girls 34%	This is the case nationally and not unique to Harrow, therefore the impact will be greater for boys because they are over represented in this characteristic
Sexual Orientation	No data available	It is unlikely that this proposal will impact on this group

Stage 3: Assessing Potential Disproportionate Impact

5. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes	✓	✓						✓	
No			X	X	X	X	X		X

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, complete a FULL EqIA.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.
- **NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**
- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 6

Stage 4: Further Consultation / Additional Evidence

6. What further consultation have you undertaken on your proposals as a result of your analysis at **Stage 3**?

Who was consulted?	What do the results show about the impact on	What actions have you taken to address the
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What consultation methods were used?	different groups / Protected Characteristics?	findings of the consultation? E.g. revising your proposals
<p>Parents and carers were invited to 1 of 4 meetings, 2 during the day and 2 after 5pm. Owing to the high number of users, information was provided to the groups below to forward to the families using their normal communication channels. E.g schools used newsletters, websites, text messages.</p> <p>The stakeholders consulted were:</p> <ul style="list-style-type: none"> • All maintained and academy schools • 4 Harrow special schools • All out borough special schools currently used by Harrow children and young people • Children’s centres, and nurseries • All chairs of governors • Parent Forum • SENDIAS (Parent Partnership) • Alternative education providers • Harrow colleges and other post 16 providers • All school’s Special Needs Co-ordinators (SENCOs) • Local voluntary organisations working with families of disabled children • Paediatric services <p>Parent Forum invited all families on their database.</p> <p>Information was also offered as a hard copy and responses were invited by email, post or in person to their school.</p>	<p>Verbal feedback from the earlier groups indicated that not all parent/carers were aware of the consultation and they queried the communication used to consult. They requested further information to be sent to the 4 special schools (this was carried out the same day).</p> <p>The issues arising from the consultation were:</p> <ol style="list-style-type: none"> 1. concern that transport to school would be taken away. 2. they did not want to apply for travel assistance on an annual basis. 	<p>Parent/carers were assured that legislation has not changed and all eligible children and young people would continue to receive travel assistance.</p> <p>The process for developing the annual application will be shared with Parent Forum before being finalised. The annual review process will be used for monitoring the outcomes of the policy</p> <p>A new post of Travel Assistance officer has been created to work with parents to implement the policy.</p>

<p>The consultation was put on the Council website and also on the Council's Local Offer</p> <p>In developing the consultation processes, legal service provided advice and guidance</p>		

Stage 5: Assessing Impact

7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?

Protected Characteristic	Positive Impact ✓	Adverse Impact		Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 6)
		Minor ✓	Major ✓		
Age (including carers of young/older people)	✓		✓	<p>The positive impact will be to support young people to develop their independent skills by accessing Independent Travel Training and encouraging schools to expand the living skills curriculum to include use of public transport and walking.</p> <p>The adverse impact will be on children under 5 who will no longer be offered transport to attend a pre school provision. (currently 13 users)</p>	<p>To explore opportunities to increase the amount of Travel Training on offer in Harrow. To engage with Harrow college re opportunities locally to support young people to be independent</p> <p>Parents will be made aware during the Education, Health and Care plan process (EHC plan) at an early stage of discussion that under 5 travel assistance is discretionary and is unlikely to be agreed except in very rare circumstances</p>
	✓			More options will be made available to eligible parent/carers to get their child to school,	If a child is eligible for travel assistance, the type of assistance will be discussed with the

Disability (including carers of disabled people)				including the cost of mileage. This will enable parents to have a better relationship with their child's school and to encourage more independence.	parent/carer. Legislation requires the parent to agree to most alternative forms of support on offer, i.e it cannot be imposed on them
Gender Reassignment					
Marriage and Civil Partnership					
Pregnancy and Maternity					
Race					
Religion or Belief					
Sex		√		Boys are over represented in all areas of special educational needs. This is particularly the case regarding behavior associated with learning difficulties. This can have a negative impact on provision of transport if behavior is so extreme that transport	Transport services, parents and schools work together to identify strategies to manage challenging behaviours and avoid its occurrence.

				is withdrawn temporarily	
Sexual orientation					
8. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes	√	No		
	The focus on independence in children and young people will have a positive effect on adult's services if the young adults become independent travellers. There is the potential for cumulative impact with national policy as well as within Harrow's service reviews because of savings proposals. This is particularly relevant to non statutory provision both in children's and adults which may impact on people with disabilities.				
9. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion? If yes, what is the potential impact and how likely is it to happen?	Yes	√	No		
	As above				
Stage 6 – Improvement Action Plan					
List below any actions you plan to take as a result of this Impact Assessment. These should include:					
<ul style="list-style-type: none"> Proposals to mitigate any adverse impact identified Positive action to advance equality of opportunity Monitoring the impact of the proposals/changes once they have been implemented Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this? 					

Area of potential adverse impact e.g. Race, Disability	Proposal to mitigate adverse impact	How will you know this has been achieved? E.g. Performance Measure / Target	Lead Officer/Team	Target Date
Develop an annual application process	Work with Parent Forum to look at application content and process	Process will be in place and used to monitor the impact of the policy	Carole Wells	January 2017
Disability data within SEN services should capture child's religion and ethnicity	Capture data on the proposed application forms for parents to request travel assistance	Data will be available and used for equality monitoring purposes	Carole Wells Caroline Piddington	July 2017
Explore further opportunities for funding to expand Independent Travel training.	Increase the opportunities for independent travel by children and young people with SEND by working with school travel planning officers	Funding and support for independent travel training will be secured	Carole Wells	July 2017
Ensure parent/carer is fully aware of SEN Travel Assistance policy very early in the negotiation for an education placement,	Front line SEN team raise awareness with parents at earliest opportunity of their responsibilities to get their child to school and the promotion of independent travel	Parents will be fully aware of the policy and the Council's statutory duties	Carole Wells	July 2017

particularly for children under 5				
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Stage 7: Public Sector Equality Duty

<p>10. How do your proposals meet the Public Sector Equality Duty (PSED) to:</p> <ol style="list-style-type: none"> 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 2. Advance equality of opportunity between people from different groups 3. Foster good relations between people from different groups 	<p>This proposal meets the Public sector duty by encouraging greater independence for service users, improving quality of life and reducing reliance on council services in adulthood.</p>
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Stage 8: Recommendation

11. Which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed.	
Outcome 2 – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are included in the Action Plan to be addressed.	✓
Outcome 3 – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality of opportunity. 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 adverse impact and/or plans to monitor the impact. (Explain this in Q12 below)	

12. If your EqIA is assessed as outcome 3 explain your justification with full reasoning to continue with your proposals.	
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Stage 9 - Organisational sign Off

13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	<p>People Services DETG -- circulation for comment prior to meeting on 9th August attended by Pauline Nixon.</p>
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Signed: (Lead officer completing EqIA)	Pauline Nixon	Signed: (Chair of DETG)	Johanna Morgan
Date:	9 th August 2016	Date:	9 th August 2016
Date EqIA presented at Cabinet Briefing (if required)		Signature of DETG Chair (following Cabinet Briefing if relevant)	