

## APPENDIX 2:

### Equality Impact Assessment

Name of Project	Travel Policy	Cabinet meeting date <i>If applicable</i>	14/03/2017
Service area responsible	Commissioning		
Name of completing officer	Sebastian Dacre	Date EqIA created	October 2016
Approved by Director / Assistant Director	Charlotte Pomery	Date of approval	28/02/2017

The Equality Act 2010 places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to:

- **Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act**
- **Advancing equality of opportunity between those with relevant ‘protected characteristics’ and those without them**
- **Fostering good relations between those with relevant ‘protected characteristics’ and those without them.**

In addition the Council complies with the Marriage (Same Sex Couples) Act 2013.

Haringey Council also has a ‘**Specific Duty**’ to publish information about people affected by our policies and practices.

**All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.**

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Council’s commitment to equality please visit the Council’s website.

Stage 1 – Names of those involved in preparing the EqIA	
1. Project Lead - Sebastian Dacre	5.
2. Equalities / HR - Ben Ritchie	6.
3. Legal Adviser (where necessary) Ed Jankowski	7.
4. Trade union – N/A	8.

**Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening** (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

The Council currently funds supported travel arrangements for over 500 children and young people needing assistance to travel to their educational establishment. The Council also currently provides supported travel to around 150 adults who need assistance in travelling to adult care services.

Supported travel arrangements can include (i) Haringey's in-house transport service, (ii) commissioned transport services from external providers, (iii) provision of an escort, and (iv) support with travel arrangements on public transport.

The Council has a statutory requirement to have a Sustainable Modes of Travel Strategy and a Transport Policy Statement in place. The Travel Policy is intended to provide clarity for service users and their parents and carers as to the circumstances when access to supported travel will be considered, and to ensure that those with particular and significant needs are appropriately supported.

The Travel Policy outlines how the Council will move towards a more consistent and equitable way of supporting people in the provision of Council funded travel. It is set out in two main sections: Children and Young people (0 to 18 years) (including continuing learners who started their programme of learning before their 19<sup>th</sup> birthday) and Adults with Learning Disabilities and Disabilities (with the exception of adults aged 18 to 24 with a special educational need and/or disability who are in education or training (18 and older +).

References in this document to “parents” is to parents, carers or legal guardians

#### Key Stakeholders

- Those who have a special educational need and/or disability (SEND) and require travel assistance to access school or other educational services
- Users of adult social care that require supported transport to access care settings
- Parents of those children and young people with SEND or carers of those eligible for adult social care
- Residential homes/supported living

The Travel Policy intends to advance equality of opportunity by promoting independence and ensuring that all those who have a need for travel assistance are able to access the educational establishment or care service that meets their needs.

#### Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

**This section to be completed where there is a change to the service provided**

Data Source	What does this data include?
List of those currently using supported travel services in Haringey	<p>Age break down of children and young people accessing supported travel:</p> <ul style="list-style-type: none"><li>• 5- 9 year olds 19%</li><li>• 10- 14 year olds 36%</li><li>• 15 – 18 year olds 30%</li><li>• 19 -25 year olds 15%</li></ul> <p>List of those using SEND transport</p> <ul style="list-style-type: none"><li>• Learning disabilities /Autistic 31%</li><li>• Wheel chair user 13%</li><li>• Cerebral palsy 7%</li></ul>

	<ul style="list-style-type: none"> <li>• Down Syndrome 4%</li> <li>• Blind/visually impaired 4%</li> <li>• Various other disabilities 41%</li> </ul> <p>List of those using Transport accessing adult social Care</p> <ul style="list-style-type: none"> <li>• Learning disabilities 71.5%</li> <li>• Dementia 28.5%</li> </ul>
Haringey Joint Strategic Needs Assessment	<a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/health-mothers-children-and-young-people/disabled-children-and-young-people">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/health-mothers-children-and-young-people/disabled-children-and-young-people</a> <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/dementia">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/dementia</a> <a href="http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/jsna-learning-disabilities">http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/adults-and-older-people/jsna-learning-disabilities</a>

**Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:**

**Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
<b>Sex</b>			The Travel Policy is deemed to have no adverse impact on gender, as the policy is needs based and applies equally irrespective of sex.	X
<b>Gender Reassignment</b>			The Travel Policy is deemed to have no adverse impact for residents who have undertaken gender reassignment, as the policy is based on needs and applies equally irrespective of gender characteristics. There is no indication that residents who have undertaken gender reassignment are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Age</b>	X		The Travel Policy applies differently to children and young people who are in education from adults aged 18 or above eligible for Adult Social Care. This is because of the statutory duty on the Council to ensure that all children and young people can access education locally, and to ensure that complex disabilities or other factors do not present a barrier to this. For adults, the Council's Travel Policy is there to assist those adults who cannot independently travel to adult care services.	

<b>Disability</b>	X		The Travel Policy is deemed to have a positive impact upon residents with disabilities as it ensures that they are able to access schools/services which meet their needs and are not discriminated against by being unable to access them due to not being able to get there.	
<b>Race &amp; Ethnicity</b>			The Travel Policy is deemed to have no impact on residents of different races and ethnicity as the policy is based on needs and applies equally irrespective of ethnicity. There is no indication that residents of different races and ethnicity are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Sexual Orientation</b>			The Travel Policy is deemed to have no impact on residents of different sexual orientations, as the policy is based on needs and applies equally irrespective of sexual orientation. There is no indication that residents of different sexual orientation are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Religion or Belief (or No Belief)</b>	X		The Travel Policy takes into consideration children, young people and parent's choice to apply for admission to a particular faith school, even if this is not the closest school to	

			them by travel distance. This will ensure that those children and young people who want to attend a faith school because of their religion/beliefs are not indirectly prevented from doing so because of proximity restrictions on travel support.	
<b>Pregnancy &amp; Maternity</b>			The Travel Policy is deemed to have no impact on residents who are pregnant or on maternity, as the policy is based on needs and applies equally irrespective of pregnancy/maternity. There is no indication that residents who are pregnant are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X
<b>Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))</b>			The Travel Policy is deemed to have no impact on residents who are married or in civil partnerships, as the policy is based on needs and applies equally irrespective of marital status. There is no indication that residents who are married or in civil partnerships are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.	X

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
<p>The policy will not result in any direct or indirect discrimination to any of the protected groups.</p> <p>In particular, the policy will help to advance equality of opportunity between those with disabilities and those without by continuing to ensure that those with disabilities are able to access services that they would otherwise be unable to access without travel assistance.</p> <p>There were however a number of concerns raised during the consultation around potential changes to the delivery of supported travel arrangements in the future (see Stage 7 below). Identified to the right is how we intend to address some of these concerns and mitigate risks.</p>	<p><b>1) Managing any future transition to alternative travel options</b>  There may be a risk of disruption if alternative travel options are not fully established before potential future changes to in-house travel services. We will therefore ensure alternative travel options are identified and fully phased in <b>before</b> changing any of the current in-house supported travel services. We are actively engaging with the market around identifying broader range of transport options</p> <p><b>2) Factoring in the individual circumstances of carers and families</b>  Some concerns were raised during the consultation that changes to travel support may create undue burden on carers and families. Therefore we will ensure that carers and families' situations will be an active part of the assessment around travel assistance</p> <p>We will also take into account families' financial situation when making future travel decisions. We will look at introducing a discounts policy should charging for some services be considered in the future. We will ensure that we do not charge groups who can't afford but require travel assistance</p> <p><b>3) Appeals process</b>  The new Travel Policy also introduces an objective <b>appeals process</b> for both children and young people and adults so that a travel decision can be challenged if service users or their carers believe it has been wrongly made.</p> <p><b>4) Information, advice and guidance (IAG) around travel options.</b>  The IAG service will be able to signpost to travel options. This will be through:</p> <ul style="list-style-type: none"> <li>• IAG Drop in</li> <li>• IAG Pop ups</li> <li>• IAG Outreach</li> </ul> <p>Travel options will be listed on the Council's service directory: Haricare</p>



	<p><b>5) Safeguarding duties and ensuring risk assessment process is adequate</b> We will ensure there are high standards governing travel risk assessments. We will ensure that those carrying out the assessments have the rights skills and experience. We will also monitor the consistency of the assessment approach taken</p> <p><b>6) Monitoring and evaluation</b> Travel assistance will be monitored to ensure that there is enough capacity in the market to meet the demand. This will be done by the service as a matter of course and will also be monitored annually to ensure that all protected group where eligible are receiving travel assistance and that there is no inconsistency in who receives this support.</p>
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Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?
<p>A full round of pre-consultation engagement was carried out with a wide range of stakeholders prior to carrying out statutory consultation on the draft Travel Policy over the summer. This pre-consultation period resulted in significant changes to the draft Policy so that the draft which was consulted on already reflected a range of stakeholder views.</p> <p>The consultation ran for a period of 90 days from 7<sup>th</sup> of July 2016 to 4<sup>th</sup> of October 2016. As well as organising specific consultation workshops for parents, carers and users which were attended by only 6 people, officers brought the Policy for discussion to a range of established forums, reaching about 150 people and gaining valuable feedback. The consultation pack was sent out to all users of SEND Transport and all in-house Day Centre Users. There was also an electronic questionnaire and hard copies available at Wood Green Library. This was shared</p>	<p>From reading all the responses to the consultation (a low return rate of 6%), the perception was that most people who responded are service users/carers/ parents who have /care for high complex need cases, and are had concerns that travel assistance would be taken away from them.</p> <p>Most people stated in various forms that that <b>travel arrangements should take individual circumstances into account.</b></p> <p>Also, most respondents felt that the drive of the draft policy was to make further budget savings, rather than offer a wide range of alternative travel arrangements, which would be tailored to each individual's needs and outcomes to be met.</p> <p>Key issues raised during the consultation were as follows:</p> <ul style="list-style-type: none"> <li>• Parking – concerns were raised about the sufficiency of disabled parking bays and whether there would be a greater reliance on use of personal cars, which could contribute to further congestion.</li> <li>• Travel assistance – whilst there was support for greater reliance on travel assistance, it was also questioned whether there would be sufficient assistance available for everyone requiring this.</li> <li>• Carers – carers expressed a risk that they would be required to provide travel for the people they care for, where currently they may not</li> </ul>

<p>with as a wide a group as possible through established forums. There were 39 written responses in total, which equates to a response rate of 6%.</p>	<ul style="list-style-type: none"> <li>• Charging for travel – people were concerned that disability related and other benefits would be used to pay for travel charges</li> <li>• Reduced provision – some respondents were anxious that existing supported travel would be taken away from them or the people they care for</li> <li>• Scope and eligibility – feedback highlighted that the draft policy did not offer sufficient clarity on who was eligible for travel support</li> </ul> <p>Care Act compliance – further feedback suggested that there were areas where the Policy did not meet Care Act requirements particularly with regard to maximising independence</p> <p><b>Following this feedback and other points raised during consultation, the draft Policy has been amended.</b></p>
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## Stage 8 - Final impact analysis

The Council currently funds supported travel arrangements for over 500 children and young people needing assistance to travel to their educational establishment. The Council also currently provides supported travel to around 150 adults who need assistance in travelling to adult care services.

This equality impact assessment (EqIA) finds that the new Travel Policy does not discriminate against protected groups. It aims to adopt a more consistent approach to supported travel based on an assessment of service user needs. The Travel policy intends to advance equality of opportunity by promoting independence and ensuring that all those who have a need for travel assistance are able to access the educational establishment or care service that meets their needs.

The EqIA also identifies a number of mitigating actions to help address some of the concerns raised during the consultation over the fairness and future structure of supported travel arrangements:

- We will monitor the consistency of the assessment approach taken under the new Travel Policy, including across different protected characteristics .We will also ensure there are high standards governing supported travel risk assessments and that those carrying out the assessments have the rights skills and experience.
- The new Travel Policy introduces an objective appeals process for both children and young people and adults so that a travel decision can be challenged if service users or their carers believe it has been wrongly made

- Carers and families' situations, including where appropriate their financial position, will be an active part of the assessment around supported travel assistance
- Haringey's Information, advice and guidance services will be updated to incorporate the new Travel Policy, ensuring that children, young people and adults know about the criteria and options available
- Should we change any of the current in-house supported travel services, we will ensure alternative travel options are identified and fully phased in to avoid risks of disruption.

### Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director	Charlotte Pomery	Date of review	28/02/2017
Review approved by Director / Assistant Director		Date of review	

### Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.