

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage and treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	School Travel Assistance Policies
Service Area:	SEND
Officer Completing Assessment:	Mary Jarrett
Equalities Advisor:	Rufus Pope
Cabinet meeting date (if applicable):	18 October 2022
Assistant Director	Jackie Difolco

2. Executive summary

We are proposing to update and revise our home-school transport policy. We are introducing a more detailed account of how decisions are made in the interests of transparency and to ensure our stakeholders are as informed as possible. This will also ensure that there is less confusion and misinformation in the community.

The majority of children and young people who require transport assistance to school will continue to benefit from the existing provision from Transport for London. Specialist assistance will continue to be provided for children and young people with SEND or those whose family circumstances mean that additional support to access education will be required.

The changes to provision included:

- Consideration of sustainability, focusing on the environment, emissions reduction, and promotion of independent travel options.
- Move from title of 'Travel' Policy to 'Travel Assistance' policy.
- Creating a specific policy for young people aged 16 - 25, including information about external travel support.
- Introduction of Behavioural Standards for children and young people using Transport commissioned by the Local Authority.
- Detailed explanation of the transport decision making process.
- Standardisation of disputes and appeals process in accordance with Statutory Guidance.
- Development of 'Personal travel budgets' and how they are calculated.
- Comprehensive 'Application' procedure and guidance.
- Clarity around breakfast/ after school clubs and times when Haringey will provide transport.
- Introduction of cut-off timescales. Introduction of cut-off timescales.
- COVID-19 information in relation to home-school transport.

We published our revised and updated home to school transport policy for public consultation to further 9 May 2022 to 31 July 2022.

We had 98 responses to the consultation and the feedback has been incorporated into the home to school transport policy.

3. Consultation and engagement

3a. How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

Initial Consultation and engagement has taken place via a Stakeholder delivery group prior to the proposed policies being drafted. Key stakeholders include parents and carers, Special schools, transport providers and passenger assistant services, including travel buddies.

Prior to going to Cabinet there will be a 12-week public consultation via the Local Offer web-site, supported by a communications campaign which ensures that young people and their families are aware of the new policies.

3b. Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

A number of the responses mention clarity of eligibility and information provided by the council. This has been considered in the development of a new engagement and application strategy.

Several respondents also mentioned that aiming for independence in travelling isn't always applicable for people depending on their level of need.

4. Data and Impact Analysis

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data Borough Profile¹

56,718: 0-17 (21%)
 72,807: 18-34 (27%)
 68,257: 35-49 (25%)
 44,807: 50-64 (17%)
 28,632: 65+ (11%)

Target Population Profile

The new policies will impact all young people aged 0-16 who attend full time school and live in Haringey or who are Looked After and required home-school transport in their new authority.

The policy will affect young people aged between 16-19 in full-time education.

The policy will affect young people aged 16-25 in education who have SEND.

Current profile of home-school transport users by age:

0-17	80.2%
18-34	19.4%

Potential Impacts

The data demonstrates that there is an overrepresentation of young people below the age of 17 who currently qualify for travel assistance, to whom the new travel assistance policy will apply. The policy will therefore disproportionately affect young people under the age of 18 with SEND .

The proposed policies will impact on the environment in Haringey by promoting sustainable transport.

The proposed policies, including the specific development of a policy for older young people (aged 16+) promote, where appropriate, independent travel, maximising the use of public transport to enable children and young people to exercise and to continue Haringey's Clean air policies.

4b. Disability²

Data

Borough Profile ³

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability. This equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

¹ Source: State of the Borough

² In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

³ Source: 2011 Census

Target Population Profile

Breakdown of disability within the school age population is as follows:

SEN type	Jan 2021 school census
ASD	15.6%
HI	1.9%
MLD	12.5%
MSI	0.0%
NSA	3%
OTH	3%
PD	1.9%
PMLD	0.6%
SEMH	16.8%
SLCN	28.7%
SLD	0.6%
SPLD	13.7%
VI	0.6%

The Current service users of the home school transport team have the following profile:

Wheelchair users:

Manual	7.12%
None	92.88%

Impact

The data demonstrates that a higher than Haringey average number of children who use wheelchairs access this service, demonstrating the importance of the service in supporting children and young people with mobility issues to access education thereby facilitating the improvement of their long-term opportunities.

The members of this protected group will receive better support through provision of a range of transport procured to meet their needs.

The intention of these policies is to promote equality of opportunity for SEND children and young people by providing a range of transport assistance to meet their individual needs.

The proposed policy is anticipated therefore to have a positive impact on the lives of children and young people with SEND across the range of potential needs by ensuring that they are supported to continue accessing education in a way that accommodates their individual needs.

4c. Gender Reassignment⁴

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2,000 Haringey residents are Trans.⁵

Target Population Profile

There are a small number of transgender young people attending Haringey Schools and some of these young people have SEND. We do not have reliable data regarding this.

Impacts

The individual needs of transgender young people will be addressed via a home-school transport request and assessment if required. This policy will not disproportionately affect transgender young people, and support proposed to any transgender young people following assessment will recognise and accommodate their individual needs by virtue of belonging to this protected group.

4d. Marriage and Civil Partnership

Data

Borough Profile ⁶

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

This policy will not affect or impact the parents of children or young people based on their marital status and we do not collect data regarding relationship status for home-school transport.

Impacts

⁴ Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing one's physiological or other gender attributes is a personal process rather than a medical one.

⁵ Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

⁶ Source: 2011 Census

Where individual families are disproportionately affected by, for example the impact of disability and family composition this will be considered within an individual transport request.

4e. Pregnancy and Maternity

Data

Borough Profile ⁷

Live Births in Haringey 2019: 3,646

Target Population Profile

Impacts

This policy will not significantly affect women who are pregnant. Where a family or household require this to be considered within an individual transport application this will be assessed according to the impact on the household. The policy will have a neutral impact on pregnant women.

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.⁸

Data

Borough Profile ⁹

Arab: **0.9%**

Any other ethnic group: 3.9%

Asian: **9.5%**

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: **18.7%**

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: **6.5%**

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

⁷ Births by Borough (ONS)

⁸ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/anti-discrimination-law/race-discrimination)

⁹ Source: 2011 Census

Other Mixed: 2.1%

White: 60.5% in total

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

Other White: 23%

Target Population Profile

The current population analysis of home school transport users compared to school population is as follows:

		School passenger matched (258 pupils)	All pupils – Jan 2021
ABAN	Bangladesh	5%	2.7%
AIND	Indian	1%	1.0%
AOTH	Asian Other	1%	1.5%
APKN	Pakistani	1%	0.9%
BAFR	Black African	26%	13.5%
BCRB	Black Caribbean	10%	5.9%
BOTH	Black Other	5%	2.1%
CHNE	Chinese	2%	0.9%
MOTH	Mixed Other	7%	5.7%
MWAS	Mixed White and Asian	1%	2.2%
MWBA	Mixed White and Black African	2%	1.6%
MWBC	Mixed White and Black Caribbean	1%	2.8%
NOBT	Not obtained	2%	2.3%
OOTH	Other	6%	7.4%
REFU	Refused	0%	1.2%
WBRI	White British	11%	20.0%

WIRI	White Irish	1%	0.7%
WIRT	White Irish Traveller	1%	0.1%
WOTH	White Other	17%	27.2%
WROM	White Gypsy Roma	0%	0.3%

The data demonstrates that the data in relation to users of home school transport in comparison with school population is similar. There appears to be over-representation of children from Black African, Black Caribbean and White Other backgrounds; however, the data also demonstrates high numbers of children who don't have their ethnicity recorded so it is not possible to draw conclusions from this data.

Potential Impacts

The delivery of home-school transport supports the accessibility of education for a range of children, including those from a range of ethnic backgrounds. The service needs to keep more accurate data to monitor the impact of this service in supporting access to education for children from different ethnic backgrounds.

4g. Religion or belief

Data

Borough Profile ¹⁰

Christian: 45%
 Buddhist: 1.1%
 Hindu: 1.9%
 Jewish: 3%
 Muslim: 14.2%
 No religion: 25.2%
 Other religion: 0.5%
 Religion not stated: 8.9%
 Sikh: 0.3%

Target Population Profile

The Transport Team do not keep data in regard to children's religion, however home school transport is provided to children attending a variety of education settings including faith schools.

Impacts

Provision of home-school transport to children and young people with SEND facilitates parental choice and control regarding their child being enabled to attend a faith school which can meet their learning needs and outcomes while accounting for their individual beliefs.

4h. Sex

¹⁰ Source: 2011 Census

Data

Borough profile ¹¹

Females: (50.5%)

Males: (49.5%)

Target Population Profile

The profile of home school transport users demonstrates that boys are over-represented in home-school transport.

Female	13.4%
Male	86.6%

Further analysis of data in relation to SEND demonstrates that this over-representation of boys in SEND systems is wide-spread and requires further analysis and attention.

Impacts

The provision of home school transport assistance increases the accessibility of school for all children and young people with identified SEND. In doing so, it will meet the needs of male service users who are more frequently identified as having SEND needs.

4i. Sexual Orientation

Data

Borough profile ¹²

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

The sexual orientation of passengers on home-school transport is not currently recorded.

Impacts

The provision made within the policies will ensure that all young people are supported to attend and access education. A neutral impact is anticipated.

4j. Socioeconomic Status (local)

Data

Income

8.3% of the population in Haringey were claiming unemployment benefit on 9 December 2021.¹³

20.8% of the population in Haringey were claiming Universal Credit on 9 December 2021.¹⁴

29% of employee jobs in the borough are paid less than the London Living Wage.¹⁵

¹¹ Source: 2011 Census

¹² Source: ONS Integrated Household Survey

¹³ [ONS Claimant Count](#)

¹⁴ [LG Inform](#)

¹⁵ ONS

Educational Attainment

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.¹⁶

4.4% of Haringey's working age populations had no qualifications in 2020.¹⁷ 4.8% were qualified to level one only.¹⁸

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.¹⁹

Target Population Profile

These revised policies apply to all school-aged children in Haringey and are designed to promote access to education for all children, taking into account accessibility and access issues which may be due to transport issues.

Impacts

Provision of home-school transport allows children and young people equal access to sites of education and learning which will promote education outcomes for children and young people in the Borough.

%. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The data regarding the users of the current-home school transport system indicates that they are representative of the population of children and young people with SEND in Haringey for whom the service is provided.

b. Intersectionality

Consideration of intersectionality demonstrates the disproportionate number of boys with SEND, and the data regarding home school transport indicates over-representation from Black Caribbean and Black African children within the home-school transport service. It is therefore possible to argue that the service continues to support this cohort of young people and that improved data collection will support the evidence of impact.

5c. Data Gaps

There are significant data gaps regarding users of home-school transport which will be addressed via better monitoring and management via the new Mission software

6. Overall impact of the policy for the Public Sector Equality Duty

¹⁶ Source: Annual Population Survey 2019 (via nomis)

¹⁷ [LG Inform - qualifications](#)

¹⁸ [LG Inform – level one](#)

¹⁹ [State of the Borough](#) (p.21)

The proposal will increase equality of accessibility to education via provision of specialist transport for children and young people with SEND needs and those who require transport to school because of specific family circumstances, including parental disability.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.

7. Ongoing monitoring

Service to create improved data monitoring systems to record access to service by children from different backgrounds and range of disabilities.

8. Authorisation

EQIA approved by: Assistant Director: Early Help, Prevention and SEND

Jackie Difolco

Date: Friday 19 August 2022

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EQIA process.