

Equality impact assessment

Name of policy, service or decision: Transport Policy

Lead directorate: Children's Services

1. Description – what is being assessed?

The impact of explicit application of statutory transport provision for Dudley students.

This will result in the Council adopting a position where it only provides a service for those children who comply with the School admissions policy (5 – 16 years)

2. Lead officer on assessment: Michael Robinson

3. Head of service: Inderjit Lahel

4. Members of assessment team:

Inderjit Lahel
Michael Robinson
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5. Date assessment began: July 2021

Background

6. What are the aims and objectives or purposes of the policy or service?

The policy outlines the Council's position and eligibility criteria in providing home to school transport provision within the Borough.

7. Who is it intended to affect or benefit (the target population)?

The changes to the policy to make the Council's position clearer in approach will affect parents of children of pre-school and those wishing to attend post 16 provision (further education) up until the age of 18 **and** those children attending nursey / pre-school provision.

Those young people accessing education post 19 will be subject to a Care Act Assessment under Adult Social Care and where transport is required as part of their support package this will be assessed and provided under a personal budget.

8. What are the main potential equality issues to be looked at?

- Impact on pupils from disadvantaged communities
- Impact on pupils with disabilities

Evidence gathering

9. Provide details of all information about the policy, service or decision which will help with the assessment.

Equality monitoring data:

**What monitoring data is collected for each of the protected characteristics?
Set out relevant details of this data.**

Data on gender / ethnicity / primary need / address (township and ward) is collated for pupils pre-school and post 16 from within the SEND systems.

The data is based on students / pupils / children with SEND and accessing placements. It is a measure of the demographics of the cohort of pupils who the changes in policy will affect in subsequent years.

Engagement and customer feedback:

What engagement has been carried out with users, customers, potential customers, employees as appropriate? What was the feedback?

A substantial consultation process has been outlined within the Cabinet paper which will seek to engage a wide range of stakeholders including but not limited to: -

- Children and young people across all schools, including those at Special Schools
- The parents and carers of children and young people currently receiving transport provision and those who may wish to claim it in the future Parent / Carer Forum (PCF)
- All schools with pupils and students who are likely to be affected, including those in adjacent local authorities' areas and Special Schools
- All colleges and educational institutions, including those in adjacent local authorities' areas and Independent Providers
- Local authorities in areas adjacent to the Council

- Local professionals across the Education / Health and Social Care system and those working in public services adjacent to the Council

What other relevant information do you hold e.g. are you aware of any barriers to any groups in accessing the service?

The policy and associated services are Borough wide with no apparent barriers for access.

The policy is published on the Council’s internet pages and is available through schools and support services such as SENDIASS.

What evidence is missing? What will be done to collect it?

Information on children’s ethnicity within nursey / pre-school outside of white or white British are not currently captured but will form part of the new case management system for SEND and associated transport systems.

Data analysis

10. What does the information tell you? What patterns or trends are there? What comparative data is there - how does your data compare with background data e.g. from the Census, national data or research, or other authorities?

Currently the Council funds 106 students with post 16 and post 19 transport arrangements which amounts to **£0.851m** (information correct as at September 2021 routes).

The Council also funds 25 children for children under the age of 5 within nursery settings which amounts to **£0.153m** (information correct as at September 2021 routes).

To align with DMBC School admissions policy of 4+ travel support would still be eligible for this cohort

Area	Number of Children (current)	Number of new starters (baseline number this year)	Cost per year
Pre-school age	30	29	£0.14m

Post 16	66	54	£0.58m
Post 19	24	17	£0.11m

A number of local authorities only provide statutory services for Transport. Whilst Dudley's policy is aligned to this approach, the proposed changes aim to make it clear on the Council's statutory obligations.

Current data / key statistics for post 16 students within the SEND area are detailed below.

- Compared to Dudley Census data there is an over-representation of students with SEND from both Black / Black British (6.5%) and Asian / Asian (14%) backgrounds
- The largest concentration of students are from Dudley Central (30%) and the lowest from Brierley Hill (10%). All other areas (Dudley North / Halesowen / Stourbridge range between 16% and 20%.

Children accessing nursery provision within the SEND arena are predominantly from either Dudley Central (35%) / Dudley North (21%) and Halesowen (28%).

Broken further down into ward level, the highest representations are from: -

- Castle and Priory
- Upper Gornal and Woodsetten
- Halesowen South

The cohort of young people affected by the change in policy will be across the Borough

11. From your data analysis, what are the main issues relating to each protected characteristic (if any)? Consider all three parts of the public sector equality duty.

All protected characteristics	
Age	<p>This change relates to: -</p> <ul style="list-style-type: none"> - Children aged 4 and under (pre-school) and - Pupils aged 16 and over

Disability	<p>Whilst the change in policy will not target any specific disability or illness the data highlights that those with the below needs will be mostly affected : -</p> <ul style="list-style-type: none"> - Moderate learning difficulties (19%) - Speech and Language needs (22%) and; - Autism Spectrum Disorder (18%)
Gender reassignment	- N/A
Marriage or civil partnership	- N/A
Pregnancy or maternity	- N/A
Race	As detailed within the EIA, the changes could have a negative impact on Asian / Asian British and Black / Black British students who are over represented in post 16 SEND placements compared to both Census and West Midlands neighbouring local authority figures.
Religion or belief	Data not available
Sex	<p>Current students within SEND post 16 are split as: -</p> <ul style="list-style-type: none"> - Male – 69% - Female – 31%
Sexual Orientation	- N/A
Are there any significant issues relating to other groups of people e.g. through social class or in particular parts of the borough?	
<p>The EIA details the splits across the 5 townships with Dudley Central being the highest. However, further dissection of the data into specific areas within townships indicates specific wards where there are a higher number of students accessing post 16 SEND provision: -</p>	

- Cradley and Wollescote
- Castle and Priory
- Netherton, Woodside and St Andrews

Identifying adverse impacts

12. What are the main potential adverse impacts on particular protected characteristics that need to be taken into account in changing the service or policy/making a decision? Indicate any positive impacts.

The EIA demonstrates that there will be adverse impacts on people as a result of the change of policy and this is highlighted within the key SEND data.

However, the premise of the SEND strategy and associated Joint Commissioning Strategy and Preparing for Adulthood strategy are fundamentally geared around inclusion and independence into adulthood with less reliance on traditionally commissioned / available services.

The approach is consistent with working with children so that as they do enter adulthood and, where needed, access Adult Social Care there need for funded support across health and social care is less demanding and their support packages can be more inclusive of community based activities.

The current reliance on Council funded transport means that we are and have been creating a dependence on services which impact their ongoing aspirations

Alternatives/mitigating actions

13. How will any adverse impacts identified be reduced or removed? Explain if it is decided that an adverse impact is unavoidable.

A refreshed and comprehensive independent travel training programme (ITT) for the cohort of pupils that could travel independently with appropriate training beforehand is being developed. Also the road safety team as part of the broader PHSE curriculum are developing a generic train the trainer package for schools to use to promote the development of independent travel.

However, there will be a number of students where this is not possible and the impact of the non-provision will have an impact on them and their families.

Monitoring arrangements	
14. How will the equality impact of the policy/service be monitored in future?	
<ul style="list-style-type: none"> - Number of requests resulting in appeals at stage 1 / 2 and 3 	
Action planning	
15. Provide details of actions or improvements identified during the EIA.	
<p>Details regarding religion requires collating. This will be part of the new case management and transport systems changes.</p>	
Decision making	
16. Who will be making a decision relating to the policy or service (e.g. the Cabinet, a Cabinet member through a decision sheet, a director or chief officer through delegated authority) and when will a decision be made?	
Cabinet	
<p><i>Note. The decision maker(s) need(s) to be briefed on the contents of the EIA. Include a summary of the main impacts in the 'Equality Impact' paragraph of any committee report or decision sheet (attach a copy of the EIA where appropriate).</i></p>	
Signed assessment lead officer: Michael Robinson	Date:
Chief officer/head of service: Inderjit Lahel	Date: