

Equality Impact Assessment / Equality Analysis

Item name	Details
Title of service or policy	SEND Home to School Travel policy for compulsory school age children
Name of directorate and service	SEND/ Passenger Transport
Name and role of officers completing the EIA	Laura Donnelly , Head of SEND
Date of assessment	

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1. Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes	
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>The SEND Travel Policy for children/young people of compulsory school age has been reviewed and rewritten in line with new DfE guidance. The new policy clarifies the eligibility criteria and clearly outlines all options for travel support for SEND children/young people.</p> <p>There are several aims of this policy review:</p> <ul style="list-style-type: none"> - make the information easier for parent/carers to understand - make it easier for consistent decisions to be made - ensure we are aligned with the DfE requirements - value for money <p>The new policy may make it less likely, in some cases, for parent/carers to get home to school travel support for their SEND child/young person due to the adjustments in the DfE criteria. This will affect new applications and people currently receiving travel support.</p>	

Key questions	Answers / notes	
<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>This is a review of the existing policy, taking into consideration new guidance published by DfE and political steer around budget savings. We currently spend over £4m a year on SEND home to school transport.</p> <p>This policy covers children and young people aged between 5-16 years of age.</p> <p>The changes between the current and new policy are clearly defined below:</p>	

Policy Area	Current SEND Travel Policy	New SEND Travel Policy
<p>Special educational needs, a disability or mobility problems eligibility</p>	<p>In Summary: It is stated that the Council will assess eligibility and make transport arrangements for children who cannot reasonably be expected to walk because of their mobility problems or associated health and safety issues related to their SEN or disability and parents are unable to get them to school.</p>	<p>Key Changes:</p> <ol style="list-style-type: none"> 1. Each child will be assessed on an individual basis to identify the most appropriate travel option. 2. Clarity and more information provided regarding circumstances whereby a child may be eligible: a] attending nearest school b] cannot walk even accompanied, c] medical condition affects travel. 3. Information and clarification provided

		regarding medical professional evidence (which will be considered).
Personal Travel Budgets (PTB)	Referenced as part of promoting and presenting alternative travel options to parents/carers . Also briefly mentioned in the context of options available for lone travellers	Parents/carers are encouraged to take up Personal Travel Budgets with clear information provided, outlining the advantages, indicative examples of how much you could get based on number of miles. Including the ways in which a PTB can be used Personal Travel Budgets can be used, including: <ul style="list-style-type: none"> • Shared travel arrangements with other parent/carers • Overcoming barriers that may prevent parent/carers accompanying their child to school • Covering the cost of parent/carers driving or cycling with their child to school • Paying for a Guide Escort for the child to walk to school or travel by public transport.
Independent Travel Training	No information provided	Encouraging uptake of Travel training as this could increase a young person's independence by developing these transferable skills, improving their self-esteem and confidence. Being less reliant on parent/carers to take them to places can lead to more opportunities to take part in social and community activities.

Applying for SEND HTST	No guidance provided	Clear instructions including expected timescales, deadlines etc.
Explanation of term 'Home Address'	Not defined in policy	Clearly defined. In summary: The home address is where the child resides and spends the majority of their time and is the address registered with a GP surgery.
Explanation of term 'Guide Escorts'	Not defined in policy	Clearly defined. In summary: A Guide Escort may be allocated in exceptional circumstances through an assessment of the child's Special Educational Needs and/or medical requirements, tailored to the student's travel needs.
Explanation of term 'Exceptional Circumstances'	Not defined in policy	Clearly defined. In summary: Exceptional circumstances will be recognised for the most vulnerable children when there is a strong need and the required transportation criteria are not met.
Explanation of term 'Nearest School'	Not defined in policy	Clearly defined. In summary: Where parents/carers apply for the nearest suitable school and the school is unable to offer a place, support with Travel Support may be offered to the next nearest school with a place, providing the eligibility criteria are met.
Review of eligibility	Referenced in the Guiding principles for SEND travel provision: We will regularly assess transport throughout a child's school life to ensure the right travel provision is in place.	Clarity and more information provided on the review process and the milestones at which these reviews typically take place. The Council may also consider amending the named school on an EHCP if there is a nearer suitable school or a school that would make more efficient use of the

		Council's resources regarding school travel support. (which ties in with Parental preference).
Behaviour on school transport	Referenced in the Guiding principles for SEND travel provision: We will regularly assess transport throughout a child's school life to ensure the right travel provision is in place.	Clarity on Expected behaviour in line with separate policy. Advice provided on what may happen in the event of an incident occurring during a journey.
Exclusions (listing situations where the Council typically does not provide Travel Support)	Exclusions are referenced throughout the policy document but not set out in separate section.	Exclusion information is clearly listed in a separate section.
Parental preference	No guidance provided	Clearly states that: If a parent/carer has requested a school to be named in the EHCP but there is a place at a nearer suitable school, the parent/carer will generally be responsible for transport to this school.
Car seats (required until child reaches a height of at least 135cm (4'5") or turns 12 yrs)	No guidance provided	Guidance for parents/carers on what they are responsible for providing until child reaches a height of at least 135cm (4'5") or turns 12 yrs, whichever happens first.

Key questions	Answers / notes
1.3 Do the aims of this policy link to or conflict with any other policies of the Council?	Mainstream Travel information can be found on the webpage: https://beta.bathnes.gov.uk/school-transport

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to																																													
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>Applications for SEND travel support is dealt within the SEN Team, where staff have a good understanding of SEN and Disabilities. However, no specific equalities training has been identified within the teams assessing and planning SEN Travel Support.</p>																																													
<p>2.2 What is the equalities profile of service users?</p>	<p>There are currently 433 children and young people with an Education, Health and Care plan receiving Home to School Transport:</p> <p>Age</p> <table data-bbox="712 651 1003 1129"> <tbody> <tr><td>4y</td><td>9</td><td>2.1%</td></tr> <tr><td>5y</td><td>18</td><td>4.2%</td></tr> <tr><td>6y</td><td>25</td><td>5.8%</td></tr> <tr><td>7y</td><td>29</td><td>6.7%</td></tr> <tr><td>8y</td><td>37</td><td>8.5%</td></tr> <tr><td>9y</td><td>31</td><td>7.2%</td></tr> <tr><td>10y</td><td>32</td><td>7.4%</td></tr> <tr><td>11y</td><td>56</td><td>12.9%</td></tr> <tr><td>12y</td><td>52</td><td>12%</td></tr> <tr><td>13y</td><td>38</td><td>8.8%</td></tr> <tr><td>14y</td><td>49</td><td>11.3%</td></tr> <tr><td>15y</td><td>45</td><td>10.4%</td></tr> <tr><td>16y</td><td>12</td><td>2.8%</td></tr> </tbody> </table> <p>Sex</p> <table data-bbox="712 1203 1070 1273"> <tbody> <tr><td>Male</td><td>307</td><td>71%</td></tr> <tr><td>Female</td><td>126</td><td>29%</td></tr> </tbody> </table>	4y	9	2.1%	5y	18	4.2%	6y	25	5.8%	7y	29	6.7%	8y	37	8.5%	9y	31	7.2%	10y	32	7.4%	11y	56	12.9%	12y	52	12%	13y	38	8.8%	14y	49	11.3%	15y	45	10.4%	16y	12	2.8%	Male	307	71%	Female	126	29%
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Ethnicity (some data not available due to information not given)

White	359	(incl. British, Irish or Eastern European)
Mixed Heritage	45	(incl. Black Caribbean, Black African, Asian, Chinese or White)
Black or Black British	9	(incl. Caribbean or African)
Asian or Asian British	6	(incl. Indian, Pakistani, Bangladeshi or Chinese)
Other ethnic group	6	(incl. Arab)

Primary Need (some data not included due to possible identification of individuals)

Autism	162	37%
Social, Emotional & Mental Health	91	21%
Speech, Language & Communication Needs	75	17%
Moderate Learning Difficulty	46	11%
Physical Disability	13	3%
Severe Learning Difficulties	10	2%
Specific Learning Difficulties	9	2%
Hearing Impaired	7	2%
Profound & Multiple Learning Difficulties	7	2%

Deprivation (some data not available)

(Most deprived quintile)	1	161	37%
	2	75	17%
	3	77	18%
	4	81	19%
(Least deprived quintile)	5	38	9%

Rural/Urban (some data not available)

Urban city & town	334	77%
Rural village & dispersed	58	13%
Rural town & fringe	40	9%

This number only includes children with an EHCP, this doesn't include all children receiving SEND travel support as accurate data is not available.

<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>In a recent survey sent to parent/carers asking for their feedback on the SEN Team, a few questions asked about Home to School Travel. Out the 139 respondents, 32 said they receive Home to School Transport.</p> <p>65% of respondents said they were either very satisfied or satisfied with the transport their child/young person receives.</p> <p>The feedback given was centred around several themes:</p> <ul style="list-style-type: none"> - Lack of communication with the Local Authority - Changes of driver without notice, which negatively impacts child - Finding out about transport at short notice for start school
<p>2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>none</p>
<p>2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>The new SEND policy and consultation documents can be requested in other languages and formats. People will be able to speak to someone within the Council Connect Team to give their feedback verbally if they would prefer to give feedback that way.</p> <p>An in-person event has been planned which will offer people the opportunity to give their feedback in different formats, such as verbally, using images, recording a video or soundbite. A BSL interpreter will be available at this event. There will also be an easy-read version of the new Policy available on the website and at the event. The event will take part in a warm space where we will be offering food.</p>

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

Intersectionality statement: At this point it is not possible to state or determine whether people with more than one protected characteristic will be disproportionately impacted. However this will be continually assessed during analysis of the consultation process.

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	This policy doesn't intentionally discriminate based on any protected characteristics, but some people may be more impacted than others.	It is recommended that when decisions are made using the new policy, the protected characteristics of the child or young person and parents/primary carers are also recorded, to ensure there is no unintended discrimination against a particular group or groups over time.
3.2 Sex – identify the impact/potential impact of the policy on women and men.	This new Policy may impact women more than men. This is largely due to the fact that women are often the main carer for children/young people so may be the hardest hit with the implementation of this policy.	As there are more males using the service, this change in policy may have a bigger impact on them
3.3 Pregnancy and maternity	We do not collect information on pregnancy when deciding if a child/young person is eligible for HTST, so this policy change may unintentionally affect parent/carers who may be pregnant.	No risk assessments are carried out if a child/young person receiving travel support is pregnant

<p>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</p>	<p>It is not anticipated that the policy changes will impact on transgender people.</p>	<p>We do not use gender identity when deciding if a child/young person is eligible for Travel Support so the rules of the group applies to all residents regardless of their gender identity</p>
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)</p>	<p>As this policy is aimed at children/young people with Special Educational Needs and/or Disability, it is acknowledged that this will impact this protected characteristic group.</p> <p>Although we don't collect details of parents/primary carer disabilities, there may be some disabled people that this new policy may impact.</p>	<p>Where parents/carers are disabled, we will assess their requirements for getting their child/young person to school and therefore needing travel support on a case-by-case basis.</p> <p>Training for administering medication or behaviour on transport isn't currently available.</p> <p>No written risk assessments are currently done when assessing child/young person's needs on transport.</p>
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>This new SEND Travel policy relates to children and young people aged between 5-16</p>	<p>The Travel Team takes into consideration a child/young person's age when considering travelling time to and from school, as set out in the DfE Guidance document.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>It is not anticipated that there will be an impact on residents depending on their ethnicity.</p>	<p>We do not use ethnicity data when deciding if a child/young person is eligible for HTST so the rules of the scheme would apply equally to residents of all ethnic groups.</p>

<p>3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people</p>	<p>It is not anticipated that there will be an impact on residents depending on their sexual orientation</p>	<p>We do not use data on sexual orientation when deciding if a child/young person is eligible for Travel Support so the rules of the scheme would apply equally to residents regardless of their sexual orientation.</p>
<p>3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?</p>	<p>Personal circumstances will be considered during the assessment process however it is not anticipated that there will be an impact on residents based on their marital status.</p>	<p>When looking at Travel Support applications, personal circumstances will be considered. However, eligibility will be based on the individual's ability and not their marital status.</p>
<p>3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.</p>	<p>It is not anticipated that there will be an impact on residents based on their Religion or Beliefs.</p>	<p>The SEND Travel policy will base a decision on the SEND needs of the child and not the preferred school chosen on grounds of religion, which is covered by the mainstream travel eligibility criteria.</p>
<p>3.11 Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>The new SEND Travel Policy may impact some families that are socio-economically disadvantaged because eligibility for SEND Travel Support is not means tested. However, the mainstream eligibility around extended rights also applies, which covers this category.</p>	
<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>Children/young people living in rural communities will be assessed for travel support based on the eligibility criteria.</p>	<p>Rural communities tend to experience poorer transport and travel options, so if a child or young person living in a rural community is assessed as not being eligible for Travel Support they may find it more complex / more expensive to arrange themselves.</p>

<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>It is not anticipated that there will be an impact on residents based on whether there are from an Armed Forces community.</p>	
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Collecting equalities data	Make information about equalities available in one place for children/young people receiving Travel Support within the SEND category.	This is being picked up as part of the Safety Valve project and will be included on Liquid Logic as standard within a project being picked up with the Service Design Team project.	Akhila Maddela and Laura Donnelly	April 2024
Training for drivers/ escorts	Offer drivers and escorts training on SEN behaviour and medication administration	All drivers and Guide Escorts will receive a new updated Safeguarding Course (replace existing), understanding your role & behaviours training and information sharing training. Identify Guide Escort who pupils carry EpiPens, school nurse to provide training.	Steve Doel	Ongoing

Risk assessments	Carry out risk assessments for SEND children/young people, and transport including their mediation and behaviour needs	This is currently split between two teams, but will soon become the Integrated Transport Team which will enable to risk assessments to be undertaken by one team. The Integrated Travel team are looking at developing a new post to perform this role, liaising with schools, transport and parent/carers.	Gary Peacock	September 2024
Equalities training	Ensure all relevant officers within B&NES have completed equalities training	Encourage Travel Officers to attend Equalities Training provided by the Council	Claire Sullivan	End of February 2024
Monitoring of decisions to include protected characteristics	It is recommended that when decisions are made using the new policy, the protected characteristics of the child or young person are also recorded, to ensure there is no unintended discrimination against a particular group or groups over time.	Ensure the Power BI dashboard is pulling the correct information from Liquid Logic. Where this information isn't currently on Liquid Logic, it will be gained at Annual Reviews from February 2024	Laura Donnelly and Jon Poole	Ongoing

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Christopher Wilford (Divisional Director)

Date: 8th April 2024