

KENT COUNTY COUNCIL
EQUALITY IMPACT ASSESSMENT

Please read the EIA GUIDANCE and the EIA flow chart available on KNet.
This form dated 17/12/2010 supersedes all previous EIA/ CIA forms

Directorate:

Education Learning and Skills

Name of policy, procedure, project or service

Introduction of a "Kent 16+ Travel Pass".

Type

Policy

Responsible Owner/ Senior Officer

Sue Dunn – 14 – 24 Innovation Unit Manager

Date of Initial Screening

5 September 2011

Revised 1 March 2012

Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group differently from others in Kent? YES/NO	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO	Assessment of potential impact HIGH/MEDIUM/LOW/ NONE/UNKNOWN		Provide details: a) Is internal action required? If yes, why? b) Is further assessment required? If yes, why? c) Explain how good practice can promote equal opportunities
			Positive	Negative	
Age	YES	YES	Low		<p>This proposed policy is for Kent resident learners in Years 12 and 13 (and Year 14 students who are completing their 14 – 19 studies).</p> <p>The impact of the policy will depend upon the existing levels of transport subsidy that young people receive.</p> <p>Limited trials and client consultations have taken place on to obtain client feedback.</p>
Disability	No	No			<p>It should be noted that 16-24 year-old learners with Statements of Educational Need or a Learning Difficulty Assessment (139a), will continue to receive assistance from KCC in line with the 16-19 Statutory Duty and existing KCC discretionary transport policy and so no change is being made as a result of this policy.</p>
Gender	NO	NO			
Gender identity	NO	NO			
Race	NO	NO			
	NO	NO			

Religion or belief					
Sexual orientation	NO	NO			
Pregnancy and maternity	NO	NO			

Part 1: INITIAL SCREENING

Context

KCC currently operates a discretionary post-16 transport policy for learners on low incomes and others who live more than 3 miles away from their nearest appropriate learning institution. KCC provides a subsidy for each eligible post-16 learner. Providers currently do not contribute to this subsidy. Existing travel passes are limited to two journeys a day, at certain times of day and in term time only.

In order to achieve Full Participation by 2015 it is essential that KCC offers consistent transport arrangements for post-16 learners with low incomes or are disadvantaged. In partnership with the new 16 – 19 Bursary Fund, learner support funds available from providers, and employer contributions, a proposed new Post-16 Travel Pass will offer cost effective universal bus travel for eligible 16 – 19 learners.

By involving providers in the subsidy of travel, the proposed new Pass will be more cost effective for KCC.

The proposed Post-16 Travel Pass forms a part of the wider Post-16 Discretionary Transport Policy. This EIA covers only the implications of the proposed new Pass, which will be subject to Cabinet decision before inclusion in the wider policy. The wider policy includes statutory and discretionary travel support for LLDD/SEN learners, and the vacant placement scheme. The full Post-16 Transport Policy will be subject to a separate EIA.

Aims and Objectives

It is proposed that the pass will be available to all Kent resident learners in Years 12 and 13 (and Year 14 students who are completing their 14 – 19 studies).

It will be available to school, academy or college learners through their institutions or through work based learning providers;

It will be available to 16-19 year-old Apprentices;

It will give universal bus travel, free at the point of travel;

It will cost the holder, or their parent, no more than £ £520 per year, which can be reduced for eligible learners by contributions from their provider, through their learner support funds or the new Bursary scheme, or their employer; and

It will be issued by KCC, to benefit from bulk purchase discounts from bus companies, and be administered by individual providers.

Learners on low incomes or disadvantaged will pay less than others. The process for this subsidy will be determined by KCC.

Beneficiaries

The pass will be available to all Kent resident learners in Years 12 and 13 (and Year 14 students who are completing their 14 – 19 studies).

16-24 year-old learners with Statements of Educational Need or a Learning Difficulty Assessment (139a), will continue to receive assistance from KCC in line with the 16-19 Statutory Duty and existing KCC discretionary transport policy and so no change is being made to this group as a result of this policy.

Consultation and data

The Pass is due to be launched in September 2012 and must be contained within the KCC Post-16 Transport Policy, which is a statutory publication by 31 May 2012. Five options for the delivery of the Pass have been evaluated. All options, plus a recommendation, will be presented to Cabinet on 19 March 2012. the timetable for the development of the options has been:

July 2011	Paper presented to KCC Cabinet members
	Paper presented to full Council for approval of recommendations.
September 2011	Paper presented to ELS POSC
	Limited trial of universal passes in 3 areas
March 2012	Option for the Pass and eligibility considered by POSC and fully agreed by Cabinet
April 2012	Full public statutory consultation on Post-16 Transport Policy
May 2012	Final consideration of Post-16 Discretionary Transport Policy options based on statutory consultation.
31 May 2012	Post-16 Discretionary transport Policy Published
September 2012	Implement, if agreed by Cabinet, a new post-16 transport policy for Kent, in collaboration with FE sector, schools, training providers and employers.

Potential Impact

The options explored for the Pass are:

- a) Completely withdraw all Post-16 discretionary transport support except for support for LLDD and SEN learners
- b) Status quo: No change to the discretionary transport policy
- c) Capped model: KCC limits the amount it will spend on discretionary post-16 transport. This may mean some eligible students may miss out on a Pass.
- d) Unlimited model: KCC will provide a subsidy for all students who are eligible for a Pass.
- e) Pre-paid card: KCC will issue pre-paid travel cards that learners and providers can top-up if they have excessive travel (a sub-set of the capped model)

Adverse Impact:

Since the new travel pass will offer unlimited travel throughout the year, some learners may be charged more for a Pass than they would do if eligible for the existing scheme (£520 vs £490)

Learners using a Pass excessively could have a surcharge

Rail travel is excluded.

Positive Impact:

Under the capped and unlimited models, it is estimated that approximately 1,000 more post-16 students will be eligible for a travel Pass than under the current scheme.

JUDGEMENT

Option 1 – Screening Sufficient

NO

Following this initial screening our judgement is that no further action is required.

Justification:

Option 2 – Internal Action Required

YES

There is potential for adverse impact depending on the model chosen, and so careful consideration of options has been undertaken, along with a limited trial of passes and obtaining learner, parent and provider views. (See action plan)

The unlimited pass option has been recommended to Cabinet as it removes the possibility that some eligible students could miss out if the KCC contribution was capped.

In addition, excessive use of a Pass could incur additional charges for learners, parents and providers, if the KCC contribution was capped. By recommending the unlimited model, KCC would take the risk of meeting any unexpected costs of the scheme.

Learners who are currently in Year 12 have a reasonable expectation that their existing travel arrangements will continue into Year 13. Therefore, for one year, the existing discretionary Post-16 travel policy will still be available for existing learners who request it, alongside the new scheme. During this time the operation of the new scheme will be reviewed.

Option 3 – Full Impact Assessment NO

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Date:

Name:

Job Title:

Directorate Equality Lead

Signed:

Date:

Name:

Part 2: FULL ASSESSMENT

Name

Of the policy, procedure, project or service

Responsible Owner/ Senior Officer:

Date of Full Equality Impact Assessment:

Scope of the Assessment

Set out what the assessment is going to focus on, as directed by the findings from your initial screening

Information and Data

State what information/data/research you have used to help you carry out your assessment

Involvement and Engagement

Provide details of all the involvement and engagement activity you have undertaken in carrying out this assessment and summarise the main findings

Judgement

Set out below the implications you have found from your assessment for the relevant diversity groups. If any negative impacts can be justified please clearly explain why.

Action Plan

Provide details of how you are going to deal with the issues raised in judgement above and complete the Action plan at the end of this document

Monitoring and Review

Provide details of how you intend to monitor and review progress against the above actions

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Date:

Name:

Job Title:

Directorate Equality Lead

Signed:

Date:

Name:

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
Age	<p>Potential for eligible Post-16 students to miss out on a KCC subsidy</p> <p>Potential for eligible Post-16 students to be surcharged for excessive usage</p>	<p>Unlimited model to be recommended to ensure KCC can offer a subsidised pass to all eligible learners and meet unexpected costs.</p> <p>Transitional year recommended to be put in place to monitor take-up.</p>	1,000 extra learners take-up a pass than under the current scheme (Approx 3,000 vs 2,000)	Mike Whiting	March 2011 – September 2013	<p>Current cost of discretionary Post-16 Transport Policy to KCC - £1.55 million.</p> <p>Projected cost of transitional year to KCC - £1.1 million.</p>
Age	Rail travel has been excluded from the policy	Specific survey question to be asked about rail travel vs bus travel	Of a limited survey of issued universal Passes 75% of young people never or hardly ever used rail to travel	Mark Styles	November 2011 to February 2012	None
Age	Impact of potential extra	Full Kent wide consultation	Full Kent wide views on	Scott Bagshaw	March 2012 to May 2012	None

	cost of Passes on take-up	(providers, parents and learners) on revised Post-16 transport Policy to be completed (subject to separate EIA)				
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Key messages obtained from these actions:

- 1) **Unlimited model will ensure that potentially eligible learners will not miss out on a subsidy from KCC and reassure providers about unlimited liabilities.**
- 2) **Providers are able to identify learners who would benefit from a Pass on a discretionary basis. That is providers can assess the travel needs of their students on an individual basis.**
- 3) **Income threshold for discretionary travel support should be around the lowest EMA level, approximately £20,800.**
- 4) **The highest level of support should go to the lowest income levels, around the £16,100 mark similar to existing free school meal eligibility or lower, matched to the SFA benefit definition.**
- 5) **Schools would prefer the highest level of subsidy, £ 380, if possible.**
- 6) **Apprenticeship providers are concerned if household income alone is taken as the strict criteria because learners are employed and often seen as independent from the family and should be looked at as on a hardship basis. (This reinforces the message made in the YPLA Transport Guidance.)**
- 7) **Bursary Funding allocation will not be known until end of March causing concern about the total support available from providers. Keep the criteria flexible.**
- 8) **A transitional year is needed for existing Year 12 pupils.**
- 9) **The current Freedom Pass costs £100. Be aware of expectations that the new Kent Pass will also cost £100. Emphasise the likely costs for a universal pass(£520) vs the current cost of a restricted KCC Post-16 Pass (£490)**