

**Kent County Council
Equality Analysis/ Impact Assessment (EqIA)**

Directorate/ Service:

Education and Young Peoples Services

Name of decision, policy, procedure, project or service:

Post 16 Transport Policy Statement

Responsible Owner/ Senior Officer:

Craig Chapman – Interim Head of Fair Access

Version	Author	Date	Comment
1	Scott Bagshaw	14/2/13	1 st draft before consultation
2	Scott Bagshaw	04/03/15	This considers existing transport policy unchanged from the provision and policy agreed and implemented for 2014.
3	Scott Bagshaw	February 2016	This considers the existing transport policy implemented for 2015 with further clarification around Independent Travel Training
4	J Hill	February 2016	E & D Comments
5	A Hayward	February 2016	Updated
6	J Hill	February 2016	E & D Comments
7	A Hayward	March 2016	Updated
8	J Hill	March 2016	E & D Comments
9	A Hayward	14 March 2016	Updated
10	J Hill		E & D Comments
11	A Hayward		Updated
12	C Chapman	February 2017	Updated
13	C Chapman	February 2018	Updated
14	C Chapman	January 2019	Updated
15	C Chapman	January 2020	Updated and identification of additional analysis for current pass users
16	C Chapman	April 2020	Updated to include analysis of current pass users

Author:

Craig Chapman – Interim Head of Fair Access

Pathway of Equality Analysis:

CYPE DMT/ Education Cabinet Committee/ Final sign off by Cabinet Member

Updated 20/05/2020

Summary and recommendations of equality analysis/impact assessment.

- **Context**

KCC currently operates a discretionary post-16 transport policy for learners on low incomes and learners with Education, Health and Care Plans and others who live less than 3 miles away from their nearest appropriate learning institution. KCC provides a subsidy for each eligible post-16 learner.

- **Aims and Objectives**

To develop a post 16 transport policy for Kent County Council that enables access to education for Kent Learners. To assist Kent's young adults in accessing their education in schools, colleges and through apprenticeships or work-based training provision.

Kent County Council has provided students with the opportunity to apply for a KCC 16+ Travel Saver pass which is subsidised by the Authority and can be purchased via an online application process. The KCC 16+ Travel Card gives unlimited access to the public bus network and learning providers can choose to further subsidise this charge to their students or trainees if they wish in cases of financial hardship.

With the participation age raised to 18 years, the KCC 16+ Travel Saver pass will widen the opportunity for Kent's young adults to access the education provision of their choice at a subsidised cost. This may be at schools, academies, colleges or in the workplace though an apprenticeship or other work-based training provision. Suitable support for accessing Post 16 education is not prescribed by central government and Kent use the KCC 16+ Travel Saver pass to meet its duty to enable users access to education.

Where learners can demonstrate that the KCC 16+ Travel Saver pass does not enable access to education, learners can appeal to the Local Authority with a view to accessing alternative assistance.

Kent County Council will also aim to improve the independence of learners with a Learning Difficulty Assessment, by providing travel training to students who will then be able to access public transport with the use of the KCC 16+ Travel Saver pass.

- **Summary of equality impact**

Post 16 Transport Policy has an overall positive impact for learners with protected characteristics, with little to no negative effects identified.

Adverse Equality Impact Rating Low

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment concerning the Post 16 Transport Policy statement. I agree with risk rating and the actions to mitigate any adverse impact(s) that has /have been identified.

Head of Service

Signed:

Name: Craig Chapman

Job Title: Interim Head of Fair Access

Date:

DMT Member

Signed:

Name: David Adams

Job Title: Interim Director of Education

Date:

Part 1 Screening

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

Protected Group	Please provide a <u>brief</u> commentary on your findings. Fuller analysis should be undertaken in Part 2.			
	High negative impact EqIA	Medium negative impact Screen	Low negative impact Evidence	High/Medium/Low Positive Impact Evidence
Age	N/A	N/A	N/A	Policy can widen access to young adults who are legally required to remain in an education/ apprenticeship who currently cannot access a discounted travel option
Disability	N/A	N/A	N/A	Can also help to promote independence with Independent Travel Training for CYP who have disabilities/ SEN
Sex	N/A	N/A	N/A	N/A
Gender identity/ Transgender	N/A	N/A	N/A	N/A
Race	N/A	N/A	N/A	N/A
Religion and Belief	N/A	N/A	N/A	Those who travel further to attend a school/ college that fits in with religion belief or none are able to do so using the Post 16 pass.

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Sexual Orientation	N/A	N/A	N/A	N/A
Pregnancy and Maternity	N/A	N/A	N/A	Those who are pregnant or within six months of delivery are able to still attend school college or undertake/ complete an apprenticeship which will result in better employment and further education options
Marriage and Civil Partnerships	N/A	N/A	N/A	N/A
Carer's Responsibilities	N/A	N/A	N/A	Young Carers (as well as Children in Care and Care leavers) remain eligible for a free Young Person's Travel Pass, although are eligible for a 16+ Travel card should they wish to apply for one in addition.

Part 2

Equality Analysis /Impact Assessment

Protected groups

Low to Medium Positive Impact: Age/Disability/Religion or Belief/Pregnancy and Maternity /Carer

No expected Negative Impact

Information and Data used to carry out your assessment

Each year Kent County Council has a legal duty to consult on its policy for Post 16 Transport. The consultation for 2020 intake took place between 10 February 2020 and 29 March 2020 with the following groups invited to comment on the Post 16 Transport Policy.

- Learning Providers
- Bus/train companies
- Children and Young People affected by proposals
- Parents / carers
- Schools and colleges

These groups will be asked to provide comments on the Post 16 Transport Policy regarding

- The eligibility criteria for applying for support
- The 16+ Travel Card
- Types of travel available with the 16+ Travel Card
- Any other aspect of the policy.

Who have you involved consulted and engaged?

Consultation will be held as outlined above

Analysis

No expected negative impact. Post 16 Transport Policy remains broadly unchanged since 2011 and has been internally reviewed and opened to public consultation on an annual basis since.

There are no proposed changes for 2020/21 academic year and so there is no expectation that any associated risks will change.

Feedback from 2019-20 Consultation

KCC held a public consultation on the proposed post 16 transport policy statement which ran from 19 February to 7 April 2019.

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Schools, colleges and learning providers have been consulted, as have their students. Neighbouring local authorities and Public Transport have also been included in the consultation, as have parents.

It was promoted in the following ways:

- KELSI bulletin
- Emails to schools, FE providers and other stakeholders
- Emails to existing 16+ Travel Card users (now known as the KCC 16+ Travel Saver pass)
- Posters to be used by learning providers to promote the consultation to students
- Electronic invites sent to registered users of KCC's consultation directory, based on their preferences

There was a total of 114 responses to the consultation a modest increase on the 91 responses to last year's consultation. Responders were asked to categorise the aspects of the Transport Policy Statement on which they wished to comment into 4 themed areas. Some respondents commented on more than one theme which explains discrepancy in total comments.

- Eligibility criteria for applying for support (18 comments)
- The 16+ Travel Card (92 comments)
- Types of Travel Available (21 comments)
- Another aspect of the policy (19 comments)

Of these responses

87.72% of responses were received from parents/carers

6.15% of responses were received from a pupil/student in Yr12 -14

1.75% of response was received from a pupil/student in Yr7 – 11

2.63% of responses were received from a learning provider

1.75% responses were received from other parties

The majority of parent/carers and pupils/students who took part in the consultation currently use the travel card or purchase the card for their dependents.

Comments about the Policy

Responses to the consultation were consistent across the different groups.

The majority of the respondents that left comments about the policy felt the cost of the card was too expensive (26.3%). Comparisons between the KCC Travel Saver Pass and the KCC 16+ Travel Saver pass were made especially by parents who have students in school using both passes.

The KCC Travel Saver pass is limited to journeys related to a student's access to schools only and the additional cost of the KCC 16+ Travel saver pass is a reflection of its wider availability during evenings and weekends. The scheme ensures that financial barriers do not limit access to the KCC 16+ Travel Saver pass, as colleges are equipped to assist eligible students with a bursary supported or free pass based on their level of need.

An equal number of respondents (26.3%) supported The KCC 16+ Travel Saver pass, especially with the extended use at weekends and holidays.

The next most frequent comment related to the requirement for children to remain in education by law (14.6% of comment comments) and the differences between pre and post 16 transport options in spite of the fact that learners often continue to attend the same school. Free school transport is provided to a child's nearest appropriate school where it is over the statutory distance from their home up to the end of Year 11. This provision is funded centrally by government and is a legal right to all children who qualify. While a learner continues to be required to take part in education or employment-based training until they reach the age of 18, there is no similar provision or right to free school transport for the majority of Post 16 pupils. Funding is no longer provided by central government to allow this free transport to continue. As a result, most Post 16 learners are not legally entitled to free school transport and different transport arrangements must be made for a pupil transitioning to Year 12, even if this is to the same establishment they have previously been entitled to free school transport to. KCC has provided a discretionary scheme for Post 16 learners in the same way that support is provided to non-eligible pre-16 learners via the subsidised Kent Travel Saver pass.

18.4% of comments were made about the poor levels of service in the public bus network. This related to overcrowding, lateness, unhelpful drivers and a general lack of usable information. KCC is dependent on the local private bus network and while routes are regularly monitored to ensure there is sufficient capacity to support all Travel Pass users, it is not possible to provide the same level of service as transport directly procured by KCC. Use of the public bus network is the most efficient way to support public travel, and KCC continues to work with parents and providers where issues arise.

9.6% of comments requested that the scheme considered reduced costs where multiple children within a family require passes and for this consideration to be applied across both the Kent Travel Saver pass and the Kent 16+ Travel Saver pass. Where this would cause a financial barrier to a learner accessing their educational establishment, the scheme allows for parents to appeal directly to members of the Transport Regulation Committee Appeals Panel for additional support.

7% of comments suggested that respondents would prefer to be able to pay for the card on a monthly or instalment basis. Following additional

development of the application process, it is now possible to purchase via an instalment programme.

Equality and Diversity

Where these numbers do not aggregate to the total number of submissions, it is as a result of the respondent choosing not to answer the question.

The assessment from the consultation shows that of those responses received, the following ethnic groups took part:

White English	59.65%
White Other	3.51%
Black or Black British: African	2.63%
Black or Black British: Other	0.88%
Mixed: White and Asian	0.88%
Mixed: White and Black Caribbean	0.88%
White Northern Irish	0.88%
Prefer not to say	3.51%

The following responses identified their gender as follows:

Male	17.5%
Female	56.14%
Prefer not to say	0.00%

When asked if the responded considered themselves disabled as set out in the Equality Act 2010:

Yes	2.63%
No	68.42%
Prefer not to say	2.63%

There were no clear patterns of response from respondents with protected characteristics and no specific equality issues were raised during this consultation. Future consultations will continue to be made available to all current and forthcoming Post 16 learners, giving everyone an equal opportunity to respond.

Analysis of current Kent 16+ Travel Saver cohort

Work was completed during the 2020-21 consultation window to analyse demographic information of the current cohort of Kent 16+ Travel Saver users to allow for findings to be considered before the determination of the policy.

Data

The dataset for 16+ Travel Saver pass holders contained 6,138 pupils. In order to gain more information on these pupils the first name, surname and date of births were matched to the Integrated Model 2017/18 or 2018/19. 95

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matched to 2018/19 dataset and 5,148 matched to the 2017/18 dataset. Where information matched both datasets the more recent information was used. All information was gained by using the Integrated Datasets.

Of the 6,138 individual pupils in the Post 16 travel data 5,157 pupils were matched. This is a match rate of 84%.

For comparison purposes the 2017/18 dataset was used. Information from the Year 10 and Year 11 pupils in this dataset was compared to that with those who were matched in the Post 16 dataset. This group is known as the whole cohort and contains 31,766 pupils.

Significance testing was carried out to compare the two groups, using the Wilson method. 95% confidence intervals were added to each of the charts. A confidence interval tells us that at a given value of certainty, the true value in the population will likely be in the range identified.

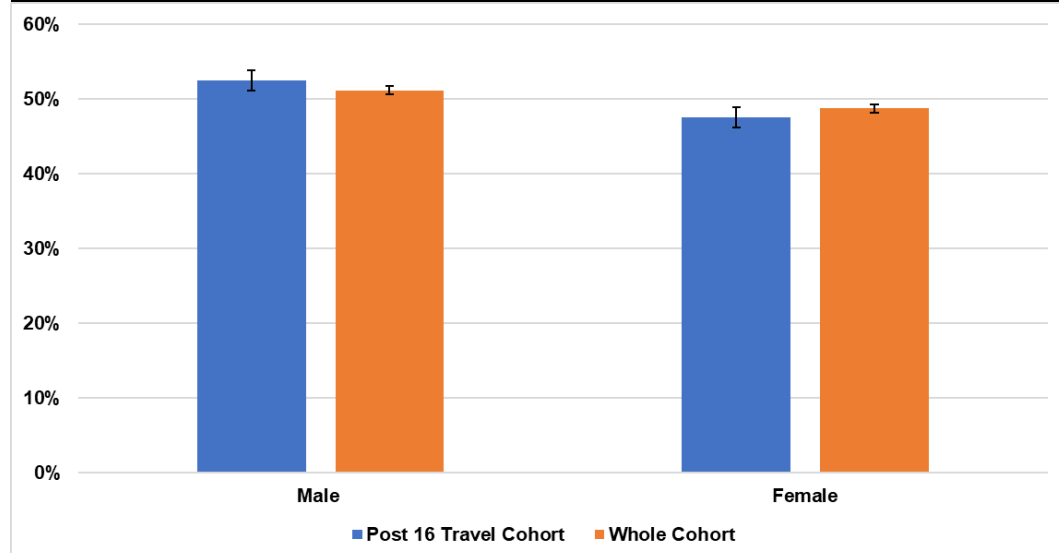
Demographics

Gender

There is no significant difference between the two cohorts for gender.

Table 1 showing gender comparisons

Gender	Post 16 Travel Matched Cohort		Whole Cohort	
	Number	Percentage	Number	Percentage
Male	2,705	52.5%	16,267	51.2%
Female	2,452	47.5%	15,499	48.8%
Total	5,157	100.0%	31,766	100.0%

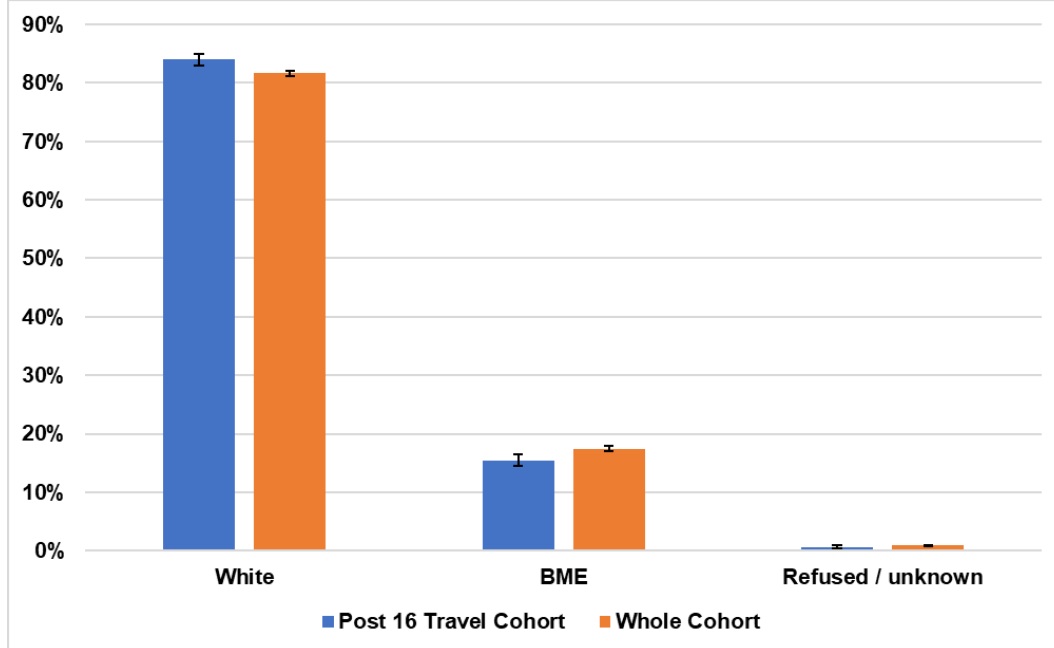


Ethnicity

There is a slightly higher proportion of white pupils in the Post 16 travel cohort than in the whole cohort, this difference is significant. There are significantly fewer BAME pupils in the Post 16 travel cohort, than in the whole cohort.

Table 2 Ethnicity breakdown of the matched cohort

Ethnicity	Post 16 Travel Matched Cohort		Whole Cohort	
	Number	Percentage	Number	Percentage
White	4,331	84.0%	25,934	81.6%
BME	794	15.4%	5,545	17.5%
Refused / unknown	32	0.6%	287	0.9%
Total	5,157	100.0%	31,766	100.0%

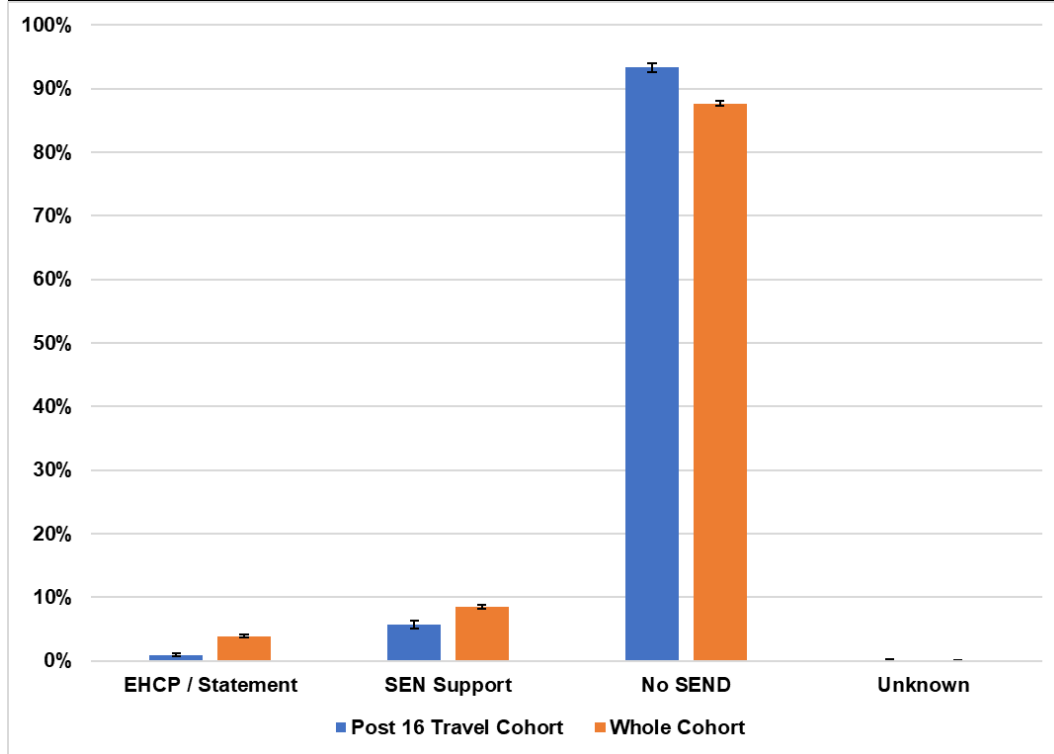


SEND

The 16+ Travel Saver cohort has significantly lower proportions for those with SEN support and those with an EHCP or statement when compared to the whole cohort. This is to be expected, however, as the Post 16 Transport Policy statement offers additional support for learners with an EHCP and so between 900 and 1000 pupils will be making use of free school transport options or undertaking travel training. This number varies through the school year. As a result, between 76 and 85% of SEND learners will receive some or full support from KCC in relation to Post 16 transport compared to 17% of learners with no SEND.

Table 3 Showing the SEND status of matched pupils. (Please note this will be a snapshot in time based on January 2017 or January 2018 – depending on which Integrated Dataset the pupil has been matched to)

SEND Status	Post 16 Travel Matched Cohort		Whole Cohort	
	Number	Percentage	Number	Percentage
EHCP / Statement	46	0.9%	1,234	3.9%
SEN Support	293	5.7%	2,688	8.5%
No SEND	4,812	93.3%	27,838	87.6%
Unknown	6	0.1%	6	0.0%
Total	5,157	100.0%	31,766	100.0%

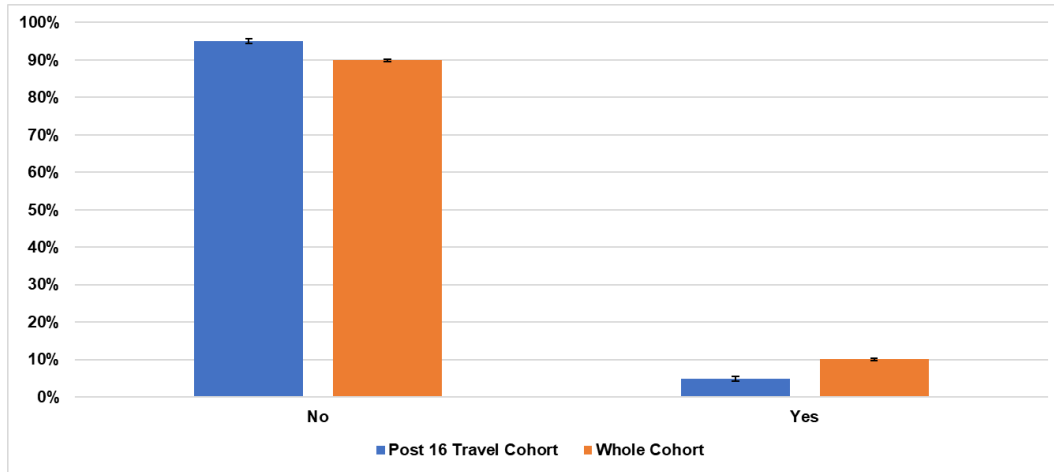


Free School Meals

The 16+ Travel Saver cohort has a significantly lower proportion of pupils who have free school meals compared to the whole cohort.

Table 4 Showing whether the pupil had Free School Meals comparison (Please note this will be a snapshot in time based on January 2017 or January 2018 – depending on which Integrated Dataset the pupil has been matched to)

Free School Meals	Post 16 Travel Matched Cohort		Whole Cohort	
	Number	Percentage	Number	Percentage
No	4,902	95.1%	28,556	89.9%
Yes	249	4.8%	3,204	10.1%
Unknown	6	0.1%	6	0.0%
Total	5,157	100.0%	31,766	100.0%



JUDGEMENT

Positive Impact:

KCC's discretionary Post 16 transport offering provides a wide range of learners with transport options that would otherwise not be available to them. It is offered to all learners, so no protected group is negatively impacted directly by its availability. Protected groups are empowered to attend school college or undertake/complete an apprenticeship which will likely result in better employment and further education options. The policy allows for wider selection of learning establishments and offers a subsidised option to accessing further education opportunities. Provision is included within the policy to support learners from low income backgrounds.

The analysis of current 16+ Travel Saver pass users has shown, however, that there are potentially groups that are not making use of this option as widely as others. There is a statistically significant lower uptake of the pass for BAME families and children who are eligible for free school meals. It is currently unclear what is driving this reduced uptake.

Responses to the consultation from BAME families were predominantly in support of the programme. Negative comments related to local issues with public bus networks, which are predominantly a locality-based issue, although this may provide an avenue for further consideration. No other themes were identified within this group. Further analysis will need to be commissioned, with the intention of the Service developing targeted interventions to improve engagement with the scheme and consultation.

The consultation does not currently request family income or FSM eligibility information as this issue was identified through additional analysis that took place during the consultation window. It is therefore not currently possible to identify why uptake is limited in this area, although changes will be made to future consultations to ensure that this area can be investigated further. While

cost is a potential consideration, the scheme offers subsidised travel on an instalment basis, so should be preferable to making private arrangements for the majority of families. Further analysis in this area is needed to see what unintended barriers may be limiting the use of the Kent 16+ Travel Saver for low income families.

Action Plan

The EqIA has highlighted areas where further data is required.

Historically the quality of data held on school transport has been poor and inconsistent across the county. Measures have been taken to improve the cross matching of data to allow for more detailed analysis, however, more can be done in this area.

KCC will look to develop processes to better identify why transport support is not accessed uniformly across key demographic groups to ensure appropriate targeted advice, support and information is available.

It is important that we get a better understanding of this, to ensure that as many Kent learners as possible are making use of this provision.

Equality Impact Analysis/Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
All	Statutory consultation on policy	Consultation with stakeholders and beneficiaries	Policy is improved Greater efficiency	Craig Chapman	Yearly requirement	Part of core business
All	Poor quality data	Collection of PC data of all service users	Better quality analysis on effect of the policy Focused consultation activity	Phil Lightowler/Craig Chapman	September 2020	Current barrier is availability of third-party software development capacity and inclination from marketplace to improve systems to allow for collection of data
Race	Lower uptake of 16+ Travel Saver pass	Further analysis of dataset to ascertain whether other limitations are responsible for the reduced uptake Development of targeted	More representative uptake of usage of 16+ Travel Saver pass	Craig Chapman	December 2020	

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		strategies to increase uptake of the 16+ Travel Saver pass and involvement in future consultations				
FSM	While not a protected group, there are similar concerns that children with FSM eligibility are potentially not making full use of the transport options available to them	Further analysis of dataset to ascertain whether other limitations are responsible for the reduced uptake Development of targeted strategies to increase uptake of the 16+ Travel Saver pass and involvement in future consultations Analysis of Post	More representative uptake of usage of 16+ Travel Saver pass	Craig Chapman	December 2020	

		<p>16 Transport appeals on the basis of financial difficulty and their outcomes</p> <p>Analysis of the bursary application process of Post 16 providers</p>				
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