



Equality Impact Assessment

Full assessment form v5 / 2013

www.portsmouth.gov.uk

Directorate:

Director of Children, Families and Education

Function e.g. HR,
IS, carers:

Inclusion Service

Title of policy, service, function, project or strategy (new or old):

Amendments to the policy for the provision of home to school/college transport.

Type of policy, service, function, project or strategy:

New / proposed

Changed

Existing

Lead officer

Dr Julia Katherine

People involved with completing the EIA:

Dr Julia Katherine
Julie Sabiston
Jane James
Kelly Du Brock
Michael Henning-Pugh

Introductory information (Optional)

A Local Authority's statutory duty relating to the arrangement of suitable and free travel for children of compulsory school age is currently limited to the provisions in Schedule 35(b) of the Education Act 1996. The Education Act 1996 requires that such transport is provided to 'eligible children' in the following circumstances:

- Children in Year R to 8 years old who live at least 2 miles from the school and attend their catchment school;
 - Children aged over 8 years old to Year 11 who live at least 3 miles from the school, and attend their catchment school;
 - Children aged 8 years old to Year 6 who live at least 2 miles from the school, attend their catchment school and meet means testing criteria;
 - Children in Year 7 to Year 11 who live at least 2 miles and under 6 miles from the school and attend one of their three nearest schools and who meet means testing criteria;
 - Children with a Statement of Special Educational Needs/EHCP in Year R to 8 years old who live at least 2 miles from the school and attend their nearest qualifying special school;
 - Children with a Statement of SEN aged over 8 years old to Year 11 who live over 3 miles from the school and attend their nearest qualifying special school;
 - Children with a Statement of SEN who attend their nearest qualifying special school or designated school which is within walking distance, but who are unable to walk to that establishment accompanied or otherwise by reason of their SEN and/or disability.
 - Children who live under the statutory walking distance but whose route to school is considered unsafe.
- Currently, there is no legal requirement to provide school transport for nursery aged children or post 16 children

Councils can provide discretionary transport assistance, over and above the statutory requirements set out above and in Portsmouth we offer free transport assistance to children and young people who meet the exceptional circumstances criteria. There is no policy on what constitutes an exceptional circumstance and applications are assessed using the student eligibility grid and considered by the Inclusion Transport Appeal Panel on a case by case basis depending on the need of the child and their parent/carer.

Since May 2014, local authorities have to adhere to the statutory guidance on Post 16 Transport. It states that in assessing what transport arrangements or financial assistance may be required, the LA must have regard to:

- The needs of those who could not access education or training provision if no arrangements were made" - local authorities need to satisfy themselves that they have made the transport arrangements or arrangements for financial assistance necessary to facilitate young people's participation in education or training. Local authorities should also consider the needs of those who are vulnerable to becoming NEET or who are already NEET.
- The need to ensure that young people have reasonable opportunities to choose between different establishments at which education and training is provided" - Young people should have a reasonable opportunity to choose between the courses available to them at 16 and be supported to access their choices, to include courses outside their home local authority boundaries.
- The journey time to access different establishments needs to be taken into account - young people should be able to reach their establishment of education or training without incurring such stress, strain or difficulty that they would be prevented from benefiting from the education provided (i.e. young people should not have to make several changes of public service bus to get to their establishment of education).
- The cost of transport to the establishments in question - local authorities are expected to target any support on those young people and their families who need it most, particularly those with a low income. Local Authorities may ask learners and their parents for a contribution to transport costs.

• Specific consideration of learners with learning difficulties and /or disabilities - local authorities also have a duty under the Education and Skills Act 2008 to encourage enable and assist the participation of young people with learning difficulties and/or disabilities up to the age of 25 in education and training.

Updated March 2018

In October 2017, further statutory guidance regarding Post-16 transport to education and training was published for local authorities.

The Guidance sets out the duties of local authorities for learners aged up to 25 with SEND:

'Local authorities also have a duty under the Education and Skills Act 2008 to encourage, enable and assist the participation of young people with special educational needs and disabilities up to the age of 25 in education and training. It therefore follows that it is good practice for local authorities to include information about what transport arrangements are available and whether they are adequate to enable these young people to participate.'

'Local authorities will want to be aware of the adult transport duty in carrying out their responsibilities for this group. Under section 508F, the local authority is required to make such arrangements for the provision of transport as they consider necessary in respect of:

- (a) Adults (ie those who are aged 19 or over) for the purpose of facilitating their attendance at local authority maintained or assisted further or higher education institutions or institutions within the further education sector; and
- (b) Adults aged under 25 with an EHC plan for the purpose of facilitating their attendance at institutions where they are receiving education or training outside the further and higher education sectors. For those young adults, the local authority's duty only applies where the local authority has secured the provision of boarding accommodation in connection with that education or training.'

Step 1 - Make sure you have clear aims and objectives

What is the aim of your policy, service, function, project or strategy?

The legal responsibility for ensuring a child attends school rests with the child's parent/carer. It is estimated that 98% of transport is arranged by parent or carers in Portsmouth. However, 619 children and young people in the City receive transport assistance from the council; 437 students receive statutory transport assistance, and 182 students receive discretionary transport assistance.

In 2014, Portsmouth City Council undertook a consultation about changes to the home to school transport policy which sought to reduce the significant overspend on the allocated budget. Whilst these amendments reduced the number of discretionary awards by 65%, the overall spend continued to exceed the allocated budget; overspending by £160,756 in FY2015-16. Consequently, it is necessary to consider further amendments to the eligibility criteria for discretionary awards in order to ensure that the service is both sustainable and provides support to the most vulnerable children and young people.

In particular the following areas were identified:

- Withdrawal of transport to students over the age of 19 years old
- Removal of transport to specialist nursery provision
- Increase the cost of privilege places from £495 to £750

- Introduce a change to the financial contributions made by post 16 students
- Increase the points threshold from 60 to 70 on the exceptional circumstances criteria student eligibility grid, which entitles students to automatic entitlement to transport.

Who is the policy, service, function, project or strategy going to benefit or have a detrimental effect on and how?

Students who currently receive statutory home to school transport will continue to do so, if they meet the eligible children criteria set out in the Education Act 1996. However, the proposed changes will negatively affect those children and young people who fall into the following categories:

1. The cessation of funding for students aged 19-25 years in Years 15-20 from September 2017, will impact on students over the age of 19 years who are just starting college courses. This may mean that SEND students in this age range may not be able to continue with their college education and the opportunities it offers. In some cases this could lead to social isolation and have a detrimental impact on their emotional well being. It may also result in additional costs for Adult Social Care as these young people may need to access alternative provision or activities if they are unable to attend college.

Updated March 2018

In line with the guidance published in October 2017, it is now proposed that transport assistance to education or training continues to be provided for learners beyond the age of 19 where the young person has significant and exceptional special educational needs and disabilities and where it is considered necessary for transport to be provided to enable the young person to access this education or training (e.g. if they are continuing on a particular course beyond the age of 19).

2. The cessation of funding for nursery age students from September 2017 will impact on students who attend specialist nursery provision. This change could mean that nursery aged students with special educational needs may not be able to attend a specialist nursery.

3. The increased cost of privilege places will impact on any family that elects to purchase an available place on home to school/college transport. These changes could result in parents having to make alternative arrangements to get their child to and from school/college. It could also result in a reduction in the take up of such places which would affect the revenue generated from selling such places thereby increase the unit costs of transporting students who meet either the statutory or discretionary criteria.

4. The introduction of a two tier financial contribution model will impact as follows. Those families who meet the criteria for low income will have to start making an annual contribution of £495 from September 2017. Those families who do not meet the criteria for low income will have to pay an increased contribution of £600. These changes may cause additional financial hardship to families who are already on a low income, and may impact on parents ability to gain/sustain employment if their young person is not able to attend college. Having a lower income may impact on the parent/carer's health and well being, and undermine their ability to care for the young person.

5. Increase the points threshold from 60 to 70 for automatic entitlement to transport:
This proposed change will affect all students who are not entitled to statutory home to school/college transport. The raising of the threshold will result in a reduction in the number of children who automatically qualify for entitlement to transport under the points system. Where children and young people are no longer assessed as being entitled to transport, parents will be expected to make alternative arrangements to get them to and from school. The extent of the impact will vary according to the individual circumstances of each child and family.

What outcomes do you want to achieve?

- *Ensure the children and young people who are most in need receive assistance;
- *Ensure a reasonable, realistic and sustainable approach;
- *Achieve better control of the budget by applying a fair and consistent application and assessment process;

What barriers are there to achieving these outcomes?

- *If there is an increase in the number of children requiring transport assistance caused by an increase in the number of eligible children. Potential challenges from parents / carers.

Step 2 - Collecting your information

What existing information / data do you have? (Local or national data) If you don't have any data contact the Equalities and diversity team for some ideas

- * Numbers of children currently benefiting from statutory and discretionary/exceptional home to school transport assistance with the breakdown into different types of schools;
- * Financial figures indicating overspend on the transport assistance;
- * Data concerning the distances children and young people travel who are in receipt of assisted travel to school/college.
- * Numbers of children and young people benefiting from each of the statutory and discretionary criteria & the associated cost.

In addition a recent focus report by the Local Government Ombudsman (LGO) entitled 'Learning Lessons from Complaints' dated March 2017, outlines an increase in complaints about school transport issues. Most of these relate to failures in process including failure to consult or inform parents of proposed changes to policy; lack of clear information to enable parents to make properly informed decisions; inadequate or poorly communicated decision making for children with special educational needs; failing to consider health and safety problems associated with their educational needs and disability when considering eligibility for transport. These recommendations will be considered in any changes to the Home to School Transport Policy and Post 16 Learners Statement.

Using your existing data, what does it tell you?

The current Home to School/College Transport policy and Post 16 Learners Statement, and existing levels of parental financial contributions towards discretionary transport are comparable to other local authorities. It is also compatible with the findings set out in the recent LGO focus report: Learning lessons from complaints published in March 2017.

Currently 619 children and young people receive home to school and home to college travel assistance. 437 students benefit from such support under the statutory eligibility criteria, whilst 182 students receive discretionary as they meet the criteria for significant and exceptional circumstances.

Out of the 182 children and young people who receive non-statutory transport assistance, 27 attend a specialist nursery placement, 28 attend a mainstream school, 67 attend a special school or specialist unit attached to a mainstream school and 60 are post 16 students and attend a college or a specialist

unit attached to a special school.

There are 19 students who currently receive transport to college who are over the age of 19 years.

The figures below show the numbers of children and young people receiving discretionary transport assistance under the current criteria:

- A very small number (under 3) receive such support due to being excluded from a school and allocated a different school through the Fair Access Panel
- 10 children receive such support as they have not reached the end of the Key Stage after the consultation in 2014
- A very small number (under 3) receive such support as they were awarded transport by a Members panel before the consultation in 2014
- 4 students receive such support as currently there is no space in the designated catchment school and the next nearest school with a space available is over the statutory walking distance
- 32 students have purchased a privilege place on a minibus or taxi.

Step 3 - Now you need to consult!

Who have you consulted with?

If you haven't consulted yet please list who you are going to consult with

The consultation ran from 10 January 2017 to 20 March 2017. In total the consultation lasted 59 days, of which 54 days were during term-time. This exceeds the statutory requirement of 28 days consultation during term-time set out by the Department for Education.

As part of the consultation, the following groups were consulted:

- * Parents/ carers of children who currently receive transport assistance prior to the consultation start date;
- * Pre-school settings; primary, secondary and special school Headteachers/Chairs of Governors;
- * Post-16 colleges in the local area;
- * Portsmouth Parents' Co-production group
- * The consultation details were available on-line and therefore public in general were also able to have their say.

Please give examples of how you have or are going to consult with specific groups or communities e.g. meetings, surveys

We have consulted on the proposed amendments using a variety of channels in order to capture the views of a wide range of stakeholders.

We have informally consulted some stakeholders through attendance at a range of meetings. Parent carers were consulted through the local Parents' Co-production Group and the Empowering Children and Families Group (eCAF), and young people were consulted through the Dynamite group.

We also consulted via an on-line survey between 10th January 2017 and 20th March 2017. The survey sought the views about the proposed changes including:

- Withdrawal of transport to students over the age of 19 years old
- Removal of transport to specialist nursery provision
- Increase the cost of privilege places from £495 to £750
- Introduce a change to the financial contributions made by post 16 students
- Increase the points threshold from 60 to 70 for automatic entitlement to transport.

Letters were sent to families of post-16 students who were likely to be affected by the proposed changes, and special schools were asked to notify all families via text message.

Information about the proposed changes and on-line survey were also available on Portsmouth City Council's website.

Step 4 - What's the impact?

Is there an impact on some groups in the community? (think about race, gender, disability, age, transgender, religion or belief, sexual orientation, pregnancy and maternity and other socially excluded communities or groups)

Generic information that covers all equality strands (Optional)

The Equality Act 2010 requires the council to properly consider the aims of the Equality Duty under S.149 of the Equality Act 2010 and particularly the need to:

- avoid any unlawful discrimination against persons protected under the Act because of their age, gender, disability, race, religion or belief, sexual orientation, transgender, pregnancy of maternity and marriage and civil partnership.
- advance equality of opportunity between persons who share any of the above 'protected characteristics' and those who do not share it. This includes:
 - the need to remove or minimise disadvantages suffered by people due to their 'protected characteristics';
 - the need to meet the needs of people with 'protected characteristics', and
 - the need to encourage people with 'protected characteristics' to participate in public life (this means being able to carry out usual activities such as shopping or, in this case, school attendance) or in other activities where their participation is low.

Background to consultation:

In the last financial year the allocated budget for Home to School/College Transport overspent by £165k. In order to bring the levels of spend back in line with the allocated budgeted, it has become

necessary to make changes to the provision and delivery of these services.

A number of possible options to help reduce expenditure were proposed as follows:

- Withdrawal of the provision of transport to students over the age of 19 years old.
- The removal of transport to specialist nursery provision.
- Increase the cost of privilege places from £495 to £750.
- The introduction of contributions to home to school transport for those in post-16 education.
- Increase the points threshold from 60 to 70 for automatic entitlement to transport.

In order to understand how these options may affect the current service users a consultation was launched. Although mainly targeted at families using these services, the consultation was open to all Portsmouth residents should they wish to participate.

Prior to the consultation launching, the Co-production Group engaged into preliminary conversations around the topic. A detailed consultation questionnaire was developed and the consultation ran from 10th January to 20th March 2017. The education team ensured that all interested parties were invited to comment (i.e. parents currently accessing the service, interested parties/suppliers), as well as being available on the Portsmouth City Council website. There was also some promotion via the citizens' panel.

In total 210 individuals participated in the survey. The majority were completed via the electronic link, while 6 paper copies were submitted by the deadline. The confidence level of this sample is 90% based on a response rate of 210. This is the probability that the sample accurately reflects the attitudes of the wider population.

Key Findings:

- Fifty percent of those who responded agreed or strongly agreed with the proposal to reduce the age from 25 to 19 where exceptional and significant circumstances are considered to access home to school/college transport.
- Fifty-one percent of those who responded disagreed or strongly disagreed with the proposal to stop nursery transport.
- More respondents agreed (44%) than disagreed (34%) with the proposal to increase the cost of privilege places to £750.
- Fifty-seven percent of respondents indicated that their preference would be the introduction of a two tier system - where those currently on low income would contribute £495 and those that did not meet the criteria would pay £600, over the other two options suggested.
- Responses to the change in points remains inconclusive, in that 40% of respondents indicated that they did not know.
- Comments made generally show the lack of understanding people have about council budgets and the allocation of funding.
- For the most part the consultation supports the adoption of all proposals but the cessation of nursery transport. However, although the removal of nursery transport is not fully supported - alternative proposals have not been forthcoming. Therefore without viable alternatives, adoption of this proposal is possible with proper supporting and transparent communication. Consideration should also be considered for how it might be introduced, i.e. staggered introduction to lessen the impact. It is worth noting that of the 210 individuals who responded, 61.4% have indicated that they are not currently accessing home to school/college transport.

Ethnicity or race

Monitoring information about ethnicity of children and young people receiving transport assistance is not collected. No equality issues relating to ethnicity or race have been identified through the consultation process.

Survey findings: Of the 210 responses, 87% of respondents indicated that they were of White British origin. Although this breakdown is representative of the city as a whole, it does not identify any significant equality issues concerning the proposed changes.

Gender including transgender

Monitoring information about gender of children and young people receiving transport assistance is not collected.

Survey findings: Of the 210 responses, 77.56% of respondents identified themselves as female, 19.87% as male and 2.56% preferred not to say. Although this breakdown reflects the typical patterns of participation in consultation events, it does not identify any significant equality issues concerning the proposed changes.

Age

The proposed changes relate to certain aspects of discretionary entitlement and do not affect the council's delivery of statutory responsibilities for home to school/college transport. However the degree to which the changes impact on certain age groups will be addressed below:

1. Withdrawal of transport to students over the age of 19 years old:

This proposed change will affect students in Years 15-20; aged between 19-25 years, and just starting college courses. Based on the current cohort the proposed changes will impact on approximately 19 young people. The withdrawal of transport could mean that these students with special educational needs and/disabilities may not be able to continue with their college education and the wider opportunities it affords. This could impact on their social integration, a loss of contact with their peers and an increased sense of isolation which could have a detrimental impact on their emotional and psychological well being. It could also result in an increased demand for social care services such as access to day centres and other such activities, resulting in additional costs for Adult Social Care.

Updated March 2018

Following the publication of further statutory guidance for local authorities in October 2017, this proposal is now no longer being considered.

2. Removal of transport to specialist nursery provision:

This proposed change will specifically impact on nursery aged students with special educational needs and/or disabilities whose parents want them to attend a specialist nursery setting. Based on the current cohort the proposed change will impact on approximately 27 nursery aged students. Although it is proposed that students already in receipt of transport assistance will continue to be assessed each year under the exceptional circumstances criteria until they leave the nursery setting, parents of new students will have to take responsibility for getting their children to and from specialist nursery settings from September 2017. Although there is no statutory requirement to provide such transport and parents would ordinarily be expected to transport the child, these changes might impact on some parents' ability to get their children to and from specialist nursery settings. In some cases it may prevent the child from accessing specialist provision altogether. For example it might be difficult for the parent to transport the child to a specialist setting if they have other children who need to be taken to a school in a different area. That said, it may not always be necessary for a nursery aged child to access a specialist nursery setting and they might be able to access mainstream settings in the area where they live with additional support.

3. Increase the cost of privilege places from £495 to £750:

This change applies to all students whose parents want to purchase a vacant seat on school transport. Based on the current data the proposed change will impact on approximately 32 students. However, it

is difficult to determine how many students would be affected by this change, or their respective ages, as we have no way of predicting future demand.

4. Introduce a change to the financial contributions made by post-16 students:

This change is likely to have the greatest impact on post-16 students and their families. However, the extent of the impact will vary according to whether, or not, they meet the low income criteria.

For post-16 students from families who meet the low income criteria, the proposed change will result in parents having to make a financial contribution for the first time. Based on current data, this is likely to affect approximately 38 students. Although the contribution of £495 per annum; approximately £2.60 per day, seems reasonable, it could present a significant challenge to some families on a low income. As such the change could negatively influence the decisions that students and families make about their continuing engagement in education and learning, and lead to an increase in the number of post 16 students not in education, employment or training.

For post-16 students from families who do not meet the low income criteria, the proposed change will result in an increase of £105 per annum to £600. Based on current data, this will impact on approximately 24 students. If considered over the course of an academic year, the proposed change equates to a daily increase of approximately £0.55 which seems more affordable. That said, the change could still influence the decisions that students and families make about their future engagement in education and learning, and lead to an increase in the number of post 16 students not in education, employment or training, albeit, may be to a lesser extent than those families facing a financial contribution for the first time.

5. Increase the points threshold from 60 to 70 for automatic entitlement to transport:

This proposed change will affect all students who are not entitled to statutory home to school/college transport. For children of statutory school age, parents would be expected to make alternative arrangements to get their child to and from school. However, for young people over the statutory school age, changes to the threshold for automatic entitlement to home to school/college transport. might negatively influence parental decisions about their child's future education and learning career, and could lead to an increase in post 16 students who are not in education, employment or training.

Disability

The proposed changes relate to certain aspects of discretionary entitlement, and do not affect the council's delivery of statutory responsibilities for home to school/college transport.

The proposed changes will affect some children and young people with SEND who do not meet the statutory entitlement for home to school/college transport. However the nature and degree to which they are affected will vary, as set out below:

1. Withdrawal of transport to students over the age of 19 years old:

This proposed change will affect students with special educational needs and/or disabilities aged between 19-25 years and who are in Years 15-20, and just starting a college course. Based on the current cohort, the proposed change will impact on approximately 19 young people. The withdrawal of transport could mean that these students with special educational needs and/disabilities may not be able to continue with their college education, and the wider opportunities and benefits it affords. This could impact on their social integration, a loss of contact with their peers and an increased sense of isolation, which could have a detrimental impact on their emotional and psychological well being. It could also result in an increased demand for social care services such as access to day centres and other such activities, resulting in additional costs for Adult Social Care.

Updated March 2018

Following the publication of further statutory guidance for local authorities in October 2017, this proposal is now no longer being considered.

2. Removal of transport to specialist nursery provision:

This proposed change will specifically impact on nursery aged students with special educational needs and/or disabilities whose parents want them to attend a specialist nursery setting. Based on the current cohort the proposed change will impact on approximately 27 nursery aged students. Although it is proposed that students already in receipt of transport assistance will continue to be assessed each year under the exceptional circumstances criteria until they leave the nursery setting, parents of new students will have to take responsibility for getting their children to and from specialist nursery settings from September 2017.

Although there is no statutory requirement to provide such transport and parents would ordinarily be expected to transport the child, these changes might impact on some parents' ability to get their children to and from specialist nursery settings. In some cases it may prevent the child from accessing specialist provision altogether. For example it might be difficult for the parent to transport the child to a specialist setting if they have other children who need to be taken to schools in a different area. That said, it may not always be necessary for a nursery aged child to access a specialist nursery setting, and they might be able to access mainstream settings in the area where they live with additional support.

3. Increase the cost of privilege places from £495 to £750:

This change applies to all students whose parents want to purchase a vacant seat on school transport. Based on the current data the proposed change will impact on approximately 32 students. However, it is difficult to determine how many students would be affected by this change, or their respective ages, as we have no way of predicting future demand.

4. Introduce a change to the financial contributions made by post-16 students:

This proposed change will affect those post-16 students who have special educational needs and/or disabilities. However, the extent to which they will be affected will be dependent on whether or not their family meets the low income criteria.

For post-16 students from families who meet the low income criteria, the proposed change will result in parents having to make a financial contribution for the first time. Based on current data, this is likely to affect approximately 38 students. Although the contribution of £495 per annum; approximately £2.60 per day, seems reasonable, it could present a significant challenge to some families on a low income. As such the proposed change could negatively influence the decisions that students and families make in the future about their continuing engagement in education and learning, and lead to an increase in the number of post 16 students not in education, employment or training.

For post-16 students from families who do not meet the low income criteria, the proposed change will result in an increase of £105 per annum to £600. Based on current data, this will impact on approximately 24 students. If considered over the course of an academic year, the proposed change equates to a daily increase of approximately £0.55 which seems more affordable. That said, the change could still influence the decisions that students and families make about their future engagement in education and learning, and lead to an increase in the number of post 16 students not in education, employment or training, albeit, possibly to a lesser extent than those families facing a financial contribution for the first time.

5. Increase the points threshold from 60 to 70 for automatic entitlement to transport:

This proposed change will affect all SEND students who are not entitled to statutory home to school/ college transport. The raising the of the threshold for automatic entitlement will mean that some children and young people will no longer be guaranteed transport assistance. For SEND children of statutory school age, parents will have to make alternative arrangements to get their child to and from school. The extent of the impact will largely be dependent on the nature and extent of the young person's needs, and any other commitments that parents may have, such as childcare, school runs and employment.

However, the impact on young people over the statutory school age could be more damaging. In addition to the challenges highlighted above, the changes could negatively influence parental choices and decisions about their child's future engagement in education and learning, and could potentially lead to an increase in the number of post-16 students who are not in education, employment or training.

Religion or belief

Monitoring information about religion or belief of children and young people receiving transport assistance is not collected. No equality issues relating to religion or belief have been identified through the consultation process.

Sexual orientation

Monitoring information about sexual orientation of children and young people receiving transport assistance is not collected. No equality issues relating to sexual orientation have been identified through the consultation process..

Pregnancy and maternity

Monitoring information about pregnancy and maternity of pupils receiving transport assistance is not collected. No equality issues relating to pregnancy and maternity have been identified through the consultation process.

Other socially excluded groups or communities e.g. carers, areas of deprivation, low literacy skills

Carers: Any of the proposed changes could have an impact on those parents who have additional caring responsibilities for other adults in the wider family.

Health Impact

Have you referred to the Joint Needs Assessment (www.jsna.portsmouth.gov.uk) to identify any associated health and well-being needs?

Yes

No

What are the health impacts, positive and / or negative? For example, is there a positive impact on enabling healthier lifestyles or promoting positive mental health? Could it prevent spread of infection or disease? Will it reduce any inequalities in health and well-being experienced by some localities, groups, ages etc? On the other hand, could it restrict opportunities for health and well-being?

1. Withdrawal of transport to students over the age of 19 years old:

This change could have a potentially positive or negative impact on the young person's health. As already highlighted above, this proposed change could result in some post-19 students no longer being entitled to home to college. This could result in some young people withdrawing from college, and becoming socially isolated, which in turn could have a detrimental impact on their emotional and physical well-being, and mental health. On the hand, it could also be seen as an opportunity for some young people to use alternative forms of transport that promote their physical health and well-being such as walking and cycling. It might also provide opportunities for the young person to become more independent where it is appropriate to do so.

Updated March 2018

Following the publication of further statutory guidance for local authorities in October 2017, this proposal is now no longer being considered.

2. Removal of transport to specialist nursery provision:

Although this proposed change is unlikely to have either a positive or negative impact on the health of child or parent, it does present an opportunity to promote a more inclusive approach to nursery education, and encourage parents to consider using local mainstream settings with the provision of additional support.

3. Increase the cost of privilege places from £495 to £750:

This proposed change is unlikely to have a significant impact on the health of child or parent since it only affects those families who elect to purchase a vacant place on home to school/college transport. That said, it could provide an opportunity for some young people to use alternative forms of transport that promote their physical health and well-being such as walking and cycling. It might also provide opportunities for the young person to become more independent where it is appropriate to do so.

4. Introduce a change to the financial contributions made by post-16 students:

This proposed change could have both a positive or negative impact on the health of some post 16 students and their families. However, the nature and extent of the impact is likely to be dependent on whether or not the family meets the low income criteria. It is possible that the introduction, or increase, in financial contributions for post 16 students could lead to an increase in parental anxiety and stress levels which in turn could have an adverse impact on their mental health, especially where the family already has a limited income. In some cases, it could lead to parents making decisions about the young person's future education and learning needs based on financial considerations, rather than what would be in the young person's best interest; which in turn could have a negative impact on the young person's future life chances. That said, such changes could also promote positive health outcomes for some young people by encouraging them to use alternative forms of transport that promote their physical health and well-being, such as walking and cycling. It might also provide opportunities for the young person to become more independent where it is appropriate to do so.

5. Increase the points threshold from 60 to 70 for automatic entitlement to transport:

This raising of the threshold for automatic entitlement to home to school/college transport could have both a positive and negative impact on the health of children and young people and their parents who do not meet the revised threshold. As highlighted above, those families who are no longer entitled may experience increased financial hardship if they have to make a financial contribution, which could lead to increased levels of anxiety and stress and have an adverse impact on their health and mental well-

being. It could also influence parental decisions about their child's future education and learning where financial considerations are prioritised over the best interests of the young person; which could have an adverse impact on the young person's mental health, well-being and self-esteem. That said, such changes could also promote positive health outcomes for some young people by encouraging them to use alternative forms of transport that promote their physical health and well-being, such as walking and cycling. It might also provide opportunities for some young people to become more independent where it is appropriate to do so.

Health inequalities are strongly associated with deprivation and income inequalities in the city. Have you referred to Portsmouth's Tackling Poverty Needs Assessment and strategy (available on the JSNA website above), which identifies those groups or geographical areas that are vulnerable to poverty? Does this have a disproportionately negative impact, on any of these groups and if so how? Are there any positive impacts?, if so what are they?

The proposed changes aim to create a more affordable and sustainable model for delivering Home to School/College Transport for eligible children.

Although the proposed changes will affect the entitlement to discretionary transport for certain groups of children and young people, these changes are not considered to have a disproportionately negative impact on any specific group identified in the Tackling Poverty Needs Assessment. Furthermore we have given careful consideration as to how we could mitigate the impact of any proposed changes by introducing a phased implementation wherever possible.

It is also worth restating that these proposed changes do not affect the statutory entitlement for home to school/college transport of any eligible child.

Step 5 - What are the differences?

Are any groups affected in a different way to others as a result of your policy, service, function, project or strategy?

The proposed recommendations are not envisaged to discriminate against any of the protected groups under the Equality Act 2010, and the proposed changes do not affect those students who have statutory entitlement for home to school/college transport.

However, the proposed changes will affect those children and young people who are receipt of transport under the exceptional circumstances criteria. The extent of this impact will vary according to the individual family circumstances and the specific nature of the change as set out above.

Does your policy, service, function, project or strategy either directly or indirectly discriminate?

Yes No

If you are either directly or indirectly discriminating, how are you going to change this or mitigate the negative impact?

Not applicable.

Step 6 - Make a recommendation based on steps 2 - 5

If you are in a position to make a recommendation to change or introduce the policy, service, project or strategy clearly show how it was decided on

In light of the feedback received during the public consultation exercise and the findings of the Equalities Impact Assessment, the following amendments to the Home to School/College Transport policy have been recommended:

1. That the age range is lowered for eligible post 16 students (those with significant and exceptional needs) from 16 -25 years to 16-19 years, in line with other local authorities from 1st September 2018. For those students in Year 14 who start their college course in September 2017, we will continue to provide transport assistance to July 2019. This recommendation was modified as a result of the consultation process and Equalities Impact Assessment. The effective date has been deferred a year in order to allow families sufficient time to adjust to the changes.

Updated March 2018

Following the publication of further statutory guidance for local authorities in October 2017, this proposal is now no longer being considered.

2. That the council ceases to provide transport for new placements of nursery age students who attend specialist nursery schools from 1st September 2017. All those children who currently receive transport assistance and who continue to meet the criteria will continue to be able to make an application for each year that they attend specialist nursery provision. Applications are made on an annual basis. This recommendation has not been changed as a result of the consultation process or Equalities Impact Assessment.

3. That the cost of privilege places on a minibus or taxi is increased from £495 per annum to £750 per annum from 1st September 2017. This recommendation has not been changed as a result of the consultation process or Equalities Impact Assessment.

4. That a two tier financial contribution of £495.00 per annum for low income families and £600.00 per annum for families who do not meet the criteria for low income is introduced from 1st September 2018. This recommendation has been modified as a result of the consultation process and Equalities Impact Assessment. The effective date has been deferred a year in order to allow families sufficient time to plan for the proposed changes in September 2018.

5. That the points threshold for automatic entitlement to home to school/college transport is raised from 60 points to 70 points from 1st September 2018. This recommendation has been modified as a result of the consultation process and Equalities Impact Assessment. The effective date has been deferred a year in order to allow families sufficient time to plan for the proposed changes in September 2018.

What changes or benefits have been highlighted as a result of your consultation?

The feedback obtained through the consultation exercise and the Equalities Impact Assessment have shaped the proposed changes to the Home to School/College Transport policy and Post 16 Learners'

Statement that are being recommended to the Cabinet Member for Education.

These changes are primarily concerned with a deferring in the implementation timetable in relation to recommendations 1, 4, and 5. See above.

Updated March 2018

Following the publication of further statutory guidance for local authorities in October 2017, recommendation 1 is now no longer being proposed.

If you are not in a position to go ahead what actions are you going to take?

(Please complete the fields below)

Action	Timescale	Responsible officer

How are you going to review the policy, service, project or strategy, how often and who will be responsible?

The Home-School/College Transport policy and Post 16 Learners Statement will be reviewed annually.

The next review will take place in April 2018.

Step 7 - Now just publish your results

This EIA has been approved by: Dr Julia Katherine, Head of Inclusion Service

Contact number: 023 9284 1057

Date: 18.04.2017

Please email a copy of your completed EIA to the Equality and diversity team. We will contact you with any comments or queries about your full EIA.

Telephone: 023 9283 4789

Email: equalities@portsmouthcc.gov.uk