



Equality Impact Assessment

Full assessment form v5 / 2013

www.portsmouth.gov.uk

Directorate:

Regeneration

**Function e.g. HR,
IS, carers:**

Transport

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

Concessionary Fares Scheme Companion Pass Entitlement Criteria

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

☐ New / proposed

☐ Changed

☒ Existing

Lead officer

Chi Sharpe

People involved with completing the EIA:

Simon Bell
Gina Perryman

Introductory information (Optional)

The Companion Pass is a discretionary enhancement to the National Travel Concessions Scheme, qualifying residents are entitled to a Companion Pass, which allows the holder to have a companion travel with them free of charge when boarding the bus within the Portsmouth City Council boundary.

In January 2020 a report paper was taken to Traffic & Transportation Cabinet meeting to trial a revised eligibility criteria which was based on the service users 'needs' and not their current financial circumstances.

The existing criteria was:

- In receipt housing benefit; and
- have a signed declaration from a doctor confirming they are unable to travel alone

The trial criteria was:

- A letter from the Department of Work & Pensions confirming that the applicant is currently in receipt of the Higher rate of the care and mobility component of Disability Living Allowance (DLA).

Or

- Personal independence payment at 8 points or above against either the PIP "moving around" or "communicating verbally" activities or 8 points against the "planning and following a journey" activity and enhanced rate of care

Or

- Evidence you receive Attendance Allowance at the Higher rate

Additionally to one of the above evidence the below letter must be provided.

- A letter from a qualified medical consultant (not a general practitioner) confirming that the applicant is unable to travel alone on a bus for medical reasons.

Step 1 - Make sure you have clear aims and objectives

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

The purpose of this EIA is to provide an update following the trial of the companion pass revision criteria set out in the report which went to September 2019 Traffic and Transportation Cabinet Meeting.

<https://democracy.portsmouth.gov.uk/documents/s24203/TT%2026%20Sep%2019%20companion%20pass%20report.pdf>

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

The proposed change to entitlement criteria will have an effect on 300 existing holders of concessionary Companion Passes. Many of the holders who filled out the survey during the consultation indicated that they have a disability under the Equality Act 2010 and as such have a protected characteristic.

The proposed change to the entitlement criteria aims to make the scheme fairer for all, as outlined in the report. The proposed entitlement criteria focuses on the service users needs and removes the need for their current financial circumstances to impact on if they are eligible to receive the Companion Pass.

As part of the consultation during the trial, all individuals that currently hold a Companion Pass were written to, asking for their views on the proposal. The consultation was via a survey which was provided as a hard copy, and also online.

The survey focused questioning around the first key area outlined in section 3.1 of the T&T report. The first survey omitted questions around the second key area outlined in section 3.1, therefore a second survey was developed to cover this aspect.

The first survey was launched on 14th January 2020 and was open for eight months to enable as many respondents as possible time to complete it. The second survey was launched on 7th October 2020 and was open for six weeks. Both surveys were promoted through a targeted letter drop to pass holders and also promoted on the Portsmouth City Council website.

What outcomes do you want to achieve?

To ensure the consultation is accessible to disabled residents and gain feedback.

That the duties under the Equality Act are met.

What barriers are there to achieving these outcomes?

Reduced numbers of people using public transport due to the outbreak in Covid-19 and essential trips only being made.

Reduced applications due to people not using public transport.

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

12% of residents of Portsmouth have a disability or long term condition that impacts on their day to day activities.

131 people have a National all day-Registered blind travel pass
13 people have a National all day-Registered blind travel pass with a companion
303 people have a National companion pass
3588 people have the National standard-Disabled pass
21812 people have the National standard-Older persons pass

Using your existing data, what does it tell you?

Our existing data informs us that a very small proportion of disabled residents use the Companion Pass, the 326 people that use the transport equates to 1.21% of disabled people in the city.

of the 12% 0.05% 13 residents are registered blind with a Companion Pass.

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

A survey was produced online and in paper format including large print or braille if requested.

Paper formats were distributed around Portsmouth libraries to the Disability Forum and to all that held a Companion Pass.

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

There was an online and paper survey form through survey monkey that people could complete. Feedback was also collected via individual emails and telephone calls during the trial period.

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)

Ethnicity or race

Through the consultation no specific issues were raised relating to ethnicity or race.

Portsmouth is an ethnically diverse city with the black, Asian, Minority and ethnic (BAME) residents comprising of 16% of its total population, according to the 2011 Census.

It is not envisaged that revising the Companion Pass entitlement criteria will have a negative impact due to ethnicity or race. We did not collect this data.

Gender including transgender

According to the 2011 census by the ONS, the gender split in Portsmouth is roughly 50:50.

Through the consultation and no specific issues were raised relating to transgender.

All questions in the demographics section of the survey were voluntary and included a 'prefer not to say' option, therefore, the base sizes vary from question to question.

There were more females (58% of respondents) in the consultation sample than males (42% of respondents) Base: First survey (67)

There were no specific issues raised by any gender throughout the survey, the issues tended to impact on the age and disability protected characteristics due to the nature of the review.

Age

The number of people aged 65 years has declined by 1,260 between 2001 and 2011 (from 15.4% to 13.4% in terms of proportion of population), but the number of very old people aged 85 years and over has grown by 440 between 2001 and 2011. The proportion of population aged 85 years and over has also increased and currently stands at 2.2% (4,510) of the population.

In the survey-out of the 90 respondents, 65 answered the question and 5 did not answer this question.

15% were aged 16-25

11% were aged 26-35

22% were aged 36-45

26% were aged 46-55

12% were aged 56-65

14% were over 65

The majority of residents who filled out the survey were aged between 36-55 with even numbers between the other ages.

There were no specific issues raised by age throughout the survey

Disability

There are 12% (25,978 approx.) of people that have a disability or long term health condition that limits their day to day activities.

75 answered the question and 15 did not answer this question.

74.67% (56) declared they had a disability

18.67% (14) declared they had no disability

6.67% (5) Preferred not to say

There were no specific issues raised by age throughout the survey

Religion or belief

No specific issues have been raised with regard to religion or belief in the consultation results. It is not envisaged that revising the Companion Pass Entitlement scheme criteria will have a negative impact due to religion or belief.

We do not collect this equality data.

Sexual orientation

No specific issues have been raised with regard to sexual orientation in the consultation results. It is not envisaged that changing the criteria this scheme will have a negative impact due to sexual orientation .

We do not collect this equality data.

Pregnancy and maternity

No specific issues have been raised with regard to pregnancy and maternity in the consultation results. It is not envisaged that ceasing this scheme will have a negative impact due to pregnancy and maternity.

We do not collect this equality data.

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

No specific information has been raised through this consultation.

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?

N/A

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?

N/A

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 main groups that are affected by this proposal are disabled people, however they are not treated differently.

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?

Of the 303 people that use the service the review indicated it affects disabled and people of all ages. As outlined in the report and as one of the recommendations. Following consultation and feedback from residents mitigation measures has been put in place to reduce any impacts of the changes to the entitlement criteria. This is by allowing all existing holders to maintain their pass until it formally expires, allowing them time to gather the information to re-apply under the new criteria.

Further to this, Portsmouth City Council will actively engage with any pass holders who are directly affected by this change and are no longer eligible for a companion pass to identify if there are other services which can be used within the council to help them.

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

Though the engagement and consultation that has been undertaken as part of this revised Companion Pass Entitlement Criteria, it is recommended that the criteria is changed with some tweaks following feedback from the trial. The revised criteria focuses on peoples needs rather than their current financial circumstances.

All existing pass-holders will be contacted before the expiry of their current pass to ensure that any disadvantages are mitigated where possible due to the introduction of the revised eligibility criteria.

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

From the feedback provided by the surveys and engaged stakeholders the following changes are recommended to the Portsmouth City Council Concessionary Fares Scheme Companion Pass entitlement criteria.

1.1 Existing criteria wording:

- Personal independence payment at 8 points or above against either the PIP "moving around" or "communicating verbally" activities or 8 points against the "planning and following a journey" activity and enhanced rate of care

Recommended that this is changed to:

- Personal independence payment at 8 points or above against either the PIP "moving around" or "communicating verbally" activities or 8 points or above against the "planning and following a journey" activity and enhanced rate of care

1.2 Existing criteria wording:

- A letter from a qualified medical consultant (not a general practitioner) confirming that the applicant is unable to travel alone on a bus for medical reasons.

Recommended that this is changed to:

- You will need to provide a healthcare professional's report e.g. physiotherapist, podiatrist, nurse etc. containing their contact details confirming your disabilities and inability to travel alone.

During the trial it was established that many people who are currently entitled to a companion pass under the Concessionary Fares Scheme, are not under or have not been under a medical consultant for some time or never have been. This prompted the city council to seek alternatives by engaging with other local authorities including Southampton City Council and Hampshire County Council.

Portsmouth City Council has engaged with other local authorities (Southampton City Council and Hampshire County Council) to understand their own criteria what proof they requested for this specific addition. After this engagement the above recommendation was included.

During the trial it was found that the wording in section 1.1 did not allow for applicants who had more than 8 points planning and following a journey" activity and enhanced rate of care to be eligible. This was given as verbal feedback by two separate applicants. As it did not specifically state "above" within Portsmouth City Council's criteria wording only 8 points. Many potential applicants could have a point scoring of 12 and as such this is the reasoning behind the change this in wording.

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
N/A		

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

The various actions that are raised from this review will be monitored and implemented by various services of the council. A report will be brought back to this Committee in January 2022.

Step 7 - Now just publish your results

This EIA has been approved by: Felicity Tidbury

Contact number: 023 92 688261

Date: 19/01/2021

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