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## **KENT COUNTY COUNCIL EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)**

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public.transport@kent.gov.uk@Kent.gov.uk**

### **Directorate:**

Public Transport Department, Highways, Transportation and Waste (HT&W), Growth, Environment and Transport (GET)

### **Name of policy, procedure, project or service**

Kent County Council Bus Funding Review

### **What is being assessed?**

Kent County Council needs to reduce the level of funding that it commits to the provision of non-commercially viable but Socially Necessary Public Bus Services. This Equality Impact Assessment (EQIA) assesses the impact of the Council's approach to making this saving and considers the implications for current passengers, particularly those who are part of a protected group within the Equality Act. Separate EQIA's will be completed for all of the individual bus services that could change because of the subsidy reduction and the conclusions of these will be used to inform final outcomes.

### **Wider context**

Over the past five years Council budgets have come under increasing pressure as Central Government has reduced its funding year on year. KCC has already had to reduce its revenue expenditure by £433m since the start of 2011-12 and the budget for 2016-17 requires a further £80.8m of savings.

To contribute to the wider savings demand of the Council, the budget that pays for non-commercially viable but socially necessary bus services is being reduced by £2m. To date, over £1m in savings have been achieved through efficiencies and other intelligent measures and this has been achieved without noticeable impact upon the travelling public.

In order to achieve a £500k saving in 2016 / 17, the existing subsidised network is going to have to be rationalised and in some instances services will need to change or be reduced and some journeys will be withdrawn completely.

The approach adopted by the Council will seek to protect the most critical journeys being made, particularly where they impact on more vulnerable groups of society, most notably those identified in the Equality Act such as older, disabled and persons with mobility impairments and those that for other reasons are more reliant on the bus.

To do so, the focus of the review is to consider reducing services or withdrawing journeys where alternative services and journeys continue to operate at different times or on other days of the week. This has placed the focus on journeys operating in the morning, in the evening or on Sundays and on areas that would continue to have bus services operating at other times of the day or on other days of the week. The Council has also taken the decision to protect Kent Karrier (dial-a-ride) services from this review as it is acknowledged that by definition these represent the only transport links for rural areas or the only form of available transport for disabled members. The Council also recognises that it will need to monitor Kent Karrier services in light of the subsidy reductions owing for the potential for additional demand to be placed upon them. Routes that currently provide journeys to school have also been protected.

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### **Responsible Owner/ Senior Officer**

Steve Pay, KCC Public Transport Planning and Operations Manager

Steve Benjamin, KCC Public Transport Planner

### **Date of Initial Screening**

1<sup>st</sup> June – 3<sup>rd</sup> July 2015

### **Date of Full EqIA:**

22<sup>nd</sup> June 2015 – end May 2016

Informed by;

Full Public Consultation: 21<sup>st</sup> March to 15<sup>th</sup> May 2016

On bus inspections: ongoing

Operator and Community Engagement: ongoing

Acquired contractual information and officer knowledge: ongoing

<b>Version</b>	<b>Author</b>	<b>Date</b>	<b>Comment</b>
1	Steve Pay	01.06.2015	Initial screening.
2	Steve Pay	17.11.2015	To take account of comments provided by the Equality and Diversity Team
3.	Steve Pay	20.11.15	To take account of further comments from CL
4.	Steve Pay	07.01.16	To take account of refinement of service changes proposed.

**Screening Grid**

Characteristic	Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative	Internal action must be included in Action Plan	If yes you must provide detail
<b>Age</b>	Yes	None	Medium	<p>It has been identified that older persons are potentially more reliant on the public transport network than other protected groups or members of the wider public.</p> <p>The process adopted by the Council will seek to identify services used by older persons and use this information to inform an impact score attributable to each service. The impact score will be used to identify services / changes where the saving proposed will have the most detrimental impact.</p> <p>The Council will work with operators to replace services at lesser or no cost and may need to look to develop other transport solutions for this group, namely its Kent Karrier (dial-a-ride) network and other community transport schemes. Where particular requirements are identified that cannot be provided for through these means, then we will seek to identify alternative transport options for users such as voluntary car schemes.</p>	Yes. The approach being adopted by the Council to rationalise the network, will seek to protect those services from reduction or withdrawal.
<b>Disability</b>	Yes	None	High	<p>It has been identified that disabled people such as those with a mobility or visual impairment are potentially more reliant on the public transport network than other protected groups or members of the wider public because their disability may mean they cannot drive.</p>	Yes. The approach being adopted by the Council to rationalise the network, will seek to protect those services from reduction or withdrawal.

				<p>The process adopted by the Council will seek to identify services used by people with disabilities and use this information to inform an impact score attributable to each service. The impact score will be used to identify services / changes where the saving proposed will have the most detrimental impact.</p> <p>The Council will work with operators to replace services at lesser or no cost and may need to look to develop other transport solutions for this group, namely its Kent Karrier (dial-a-ride) network. Where particular requirements are identified that cannot be provided through these means, then we will seek to identify alternative transport options for users such as voluntary car schemes.</p> <p>In respect of this group, the Council is also minded of the need to ensure that information regarding the possible impact is accessible to all users. In addition to usual measures which include the provision of on bus notices, the Council will also seek to communicate the consultation through specialist groups such as the Kent Association for the Blind to ensure the accessibility of information. The consultation documentation will also be available in alternative formats.</p>	
<b>Gender</b>	No			It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.	
<b>Gender identity</b>	No			It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.	
<b>Race</b>	No			It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.	
	No			It is not considered that the withdrawal or reduction	

<b>Religion or belief</b>				of a bus service has any greater impact on this group than it does on the general public.	
<b>Sexual orientation</b>	No			It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.	
<b>Pregnancy and maternity</b>	No			It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.	
<b>Marriage and Civil Partnerships</b>	No			It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.	
<b>Carer's responsibilities</b>	Yes	None	Low	<p>The Council is mindful of the relationship between older and disabled persons and any carer who in many instances, can travel free of charge using a companion pass issued as part of the English National Concessionary Travel scheme.</p> <p>The process adopted by the Council will seek to identify services used by people travelling to carryout their caring responsibilities and use this information to inform an impact score attributable to each service. The impact score will be used to identify services / changes where the saving proposed will have the most detrimental impact.</p> <p>The Council will work with operators to replace services at lesser or no cost and may need to look to develop other transport solutions for this group, namely its Kent Karrier (dial-a-ride) network. Where particular requirements are identified that cannot be provided through these means, then we will seek to identify alternative transport options for users such as voluntary car schemes.</p>	Yes. The approach being adopted by the Council to rationalise the network, will seek to protect those services from reduction or withdrawal.

## Part 1: INITIAL SCREENING

### Approach

The Council is committed to ensuring that all decisions made in relation to the saving are done so with a full understanding of the service, its users and the impact of changes upon them. We will also ensure that we have exhausted all other options before we get to the stage of having to reduce or withdraw services and journeys.

The Council will collate various forms of information, including data gathered from ongoing bus inspections and the responses to the consultation and use this to assess the impact of any proposed change against the Council's criteria for supporting bus services and the Equalities Act.

In order to limit the impact on passengers, the Council has focussed its review on services and journeys where alternative public transport will still be available. In doing so, much of the focus of the review is on those services and journeys running in the early mornings, in the evenings or on Saturdays and Sundays. Services which represent the only public transport for the areas served, journeys carrying children to school and the Council's Kent Karrier services are not included as part of this review.

To enable us to respond to consultation, no final decisions have been made in order that we can use the consultation and other information about the services to inform consideration about alternative provision or the need to make the savings in a different way using the final EQIAs as a guide.

To help inform the final outcomes, the Council has developed an 'Impact Scoring' system which will be used to identify changes with most detrimental impact on service users. The Impact Score will take account of the impact upon protected groups within the Equalities Act and also of the Council's own criteria for the support of public bus services. The intention is that we will use the 'Impact Scores' to identify service changes that will have the most negative impact on users and particular user types.

Initially, every service action identified, has been determined to carry a Risk rating of 12 (classified as 'medium') using KCC's corporate risk matrix. This score has been arrived at as it is acknowledged that any change or reduction to a bus service will *likely* have a *significant* and detrimental impact upon its users.

As part of the initial screening exercise, consideration has then also been given to the user profile of particular services using information acquired through the management of the service contract (ticket types) and existing officer and operator knowledge. This has enabled us to identify certain user types who against the Equalities Act and the County Council's own criteria for supporting bus services, are more impacted by changes to bus services. The initial screening will be complimented by further information gathered through on bus surveys completed by the Council, from other information gained from operators and using information received in response to the consultation exercise about the particular services and the users of them.

### Process

It has been determined that of the groups that are identified as 'protected' within the Equalities Act, older people, disabled people and carers are potentially more disadvantaged by the withdrawal or reduction of a bus service compared to the rest of society. As an identified group, if it is established that a service conveys these user types, then additional Impact Points against each user type will be added as identified below.

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Older Persons: 2 Impact Points

Disabled: 2 Impact Points

Carers: 1 Impact Point

KCC's criteria for the support of bus services identifies journeys that provide the only access to; Education, Employment, Healthcare and Essential (food) Shopping as being the priority for funding. To take account of this, the focus of savings is to identify contracts and journeys operating on early mornings, evenings, Saturdays and Sundays and in doing so protect journeys being made for the purposes of employment and education. Journeys being made to access healthcare or food shopping can often be more flexible and therefore not time or day critical and can therefore be made on remaining commercial bus services i.e. those at different times or on different days. As such, no weighting is given to these services or journeys unless there are particular users who cannot travel at different times of the day or on a different day of the week.

Where it is identified that a service represents that only means of accessing education, employment, healthcare or essential food shopping then a further 1 Impact Point in each instance will be added to the Impact Score.

A worked example is below.

### Service X

In this instance, as part of the initial impact assessment, service X has been identified as being used by older persons (travelling on an English National Concessionary Travel Pass) and so an additional 2 points has been added to base rating of 12. Therefore the risk rating identified through the Initial Impact Assessment is 14 which is classed a 'Medium' impact.

<b>Service X</b>	
Impact Rating (12 unless unique circumstances are identified)	<b>12</b>
Evidence of Older Persons? (2 points if identified)	<b>2</b>
Evidence of Disabled Passengers? (2 points if identified)	<b>0</b>
Evidence of Passenger travelling as a 'Carer' (1 point if identified)	<b>0</b>
Does the service provide the only means of accessing employment for any passenger? (1 point if identified)	<b>0</b>
Does the service provide the only means of accessing education? (1 point if identified)	<b>0</b>
Does the service provide the only means of accessing healthcare? (1 point if identified)	<b>0</b>
Does the service provide the only means of accessing essential shopping? (1 point if identified)	<b>0</b>
<b>TOTAL</b>	<b>14</b>

Following the consultation process and having completed further surveys of the service, the Impact scores will be updated to take account of instances where we identify particular passenger types or journey purposes. For example, in the event that we identify a disabled passenger on service X then a further 2 impact points would be added. If we then identified that the service was used by passengers to get to or from work, then an additional 1 point would be added. In this example therefore, the Impact score identified would be 17 which is classed as 'High' impact.

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The final Impact Scores for each service will be used to identify services with the most detrimental impact upon service users, particularly where they are from a protected group and will then consider how we protect these services or provide reasonable alternatives for the affected users.

The project as a whole has initially been identified as carrying a 'medium' risk owing to there inevitably being negative implications for current passengers. However, the final risk weighting will be informed by the consultation and the completion of EQIAs for each service potentially affected.

## **Aims and Objectives**

Ultimately a saving of around £500k needs to be realised and this will result in some service reductions and loss of journeys.

It is acknowledged that this cannot be achieved without any detrimental impact on communities and the objective of the Council is therefore to achieve the saving but with the most limited impact on bus users, having exhausted all opportunities for other savings measures and having taken account of the Equalities Act.

To achieve this, the Council will ensure that the process is robust and properly governed, taking account of all information. Most critically, the consultation process will genuinely be used to identify the services / contracts where the impact is greatest upon service users.

## **Beneficiaries**

Ultimately there are no beneficiaries from an overall reduction in subsidy which will result in some reduction to overall service. The process identified seeks to minimise the extent of the negative impact.

## **Information and Data**

Individual EqIA's will be informed by a range of intelligence including;

- Passenger and ticketing information provided to the Council by operators throughout the life of the contract. This will inform the initial screening and enables the Council to identify some passenger groups through ticket types.
- On bus inspections that will complement the passenger data and will seek to identify particular user groups (such as the older persons and persons with mobility impairments) and particular travel habits and journey purpose (i.e. day / time critical journeys not achievable on other, remaining public transport).
- Public consultation that will run from 21<sup>st</sup> March until 15<sup>th</sup> May and will invite information from users about their journey purpose and the impact of the proposed changes.
- Bus operator, passenger and wider resident engagement

## **Involvement and Engagement**

The following parties will be engaged;

- Bus operators
- Bus Users
- User and Specialist Groups (Aged UK, Kent Association for the Blind, Mobility and Access Groups etc.)
- Wider Public (through full public consultation)
- KCC elected members

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## Potential Impact

### Initial screening (22/06/2015):

Unknown: we know that any change, reduction or withdrawal to a bus service will have a negative impact upon users of the service who have become reliant upon it. However, until we complete further, more exhaustive work such as surveys and public consultation, the total impact on users generally and from an EQIA perspective cannot be identified.

**Final findings:** (to be informed by inspections, public engagement and consultation)

## Adverse Impact:

### Initial screening (22/06/2015):

Level Unknown: there will be adverse impact but the precise extent of this is unknown until we have we know that any change, reduction or withdrawal to a bus service will have completed a full Impact Assessment.

**Final findings:** (to be informed by inspections, public engagement and consultation)

## Positive Impact:

Ultimately there will be no positive impact for users of services / journeys subject to reduction or withdrawal.

## JUDGEMENT

Option 1 – Screening Sufficient	NO
<b>Option 2 – Internal Action Required</b>	<b>YES completion of Action Plan as part of the EQIA identified at the end of this document</b>
<b>Option 3 – Full Impact Assessment</b>	<b>YES</b>

Required as;

- the potential impact of the savings measures proposed may affect a large number of Kent residents
- some of these will be from listed groups with particular characteristics
- the full impact is not yet known and will be informed by further intelligence
- the project will be subject to a full public consultation

## Action Plan

Savings need to be materialised from financial year 2016 / 17 and the contracts governing these transport arrangements demand that 90 days' notice is given to bus operators if wishing to cease or fundamentally alter the provision.

The Council has therefore formed a program that allows sufficient time (following the initial screening exercise) to complete a range of activities enabling it to understand the services concerned in more detail and critically the impact of particular user and journey types. The range of activities includes but is not restricted to; on bus inspections, full public consultation, operator engagement and engagement with bus passengers and the wider community.

We will work closely with operators to explore means of reducing subsidy and materialising the saving without the need for service reduction. We shall also understand the need to

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develop the Kent Karrier Dial-a-Ride network to offer reasonable alternatives to areas and users affected by changes to bus services.

Only once alternative options have been exhausted will the Council look to materialise the outstanding savings target through the direct reduction in subsidy and withdrawal of contracts. The initial screening and the updating of EqIA's to amend its approach and tailor the range of measures primarily by protecting services where further understanding intelligence identifies that the reduction or removal of a service will result in a particularly adverse impact to the bus user particularly where they are from an identified group.

The scoring identified as part of the initial screening exercise, will be updated to take account of the actions identified above and final 'impact scores' will be used to inform the final range of measures required to accommodate the reduced budget available.

The process will have robust governance from start to finish, will seek approval of senior and executive officers, the Cabinet Member for Highways Transportation & Waste, the Environment & Transport Cabinet Committee.

### **Monitoring and Review**

The project will be led by KCC's Public Transport, Planning and Operations Manager who will report into an informal Governance Board consisting of the following senior officers and political representatives; Head of Public Transport, Director of Highways Transportation & Waste, Corporate Director for Growth Environment & Transport and the Cabinet Member for Highways Transportation & Waste. Final sign off of proposed and final measures will be subject to the approval of KCC's Cabinet having been promoted through the Governance Board.

Initial screening and a full EQIA will be completed against the wider approach and against all of the individual service measures proposed. EqIAs will be updated on an ongoing basis throughout the process, most notably to take account of intelligence gleaned through; operator engagement, service inspections and public consultation.

Updated EqIA's (updated and informed by further intelligence) will inform the final range of measures. A full audit trail for all activities will be retained and the initial approach and the final range of measures will be considered by KCC's Cabinet Committee.

### **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: SP Name: Steve Pay  
Job Title: Public Transport Planning and Operations Manager  
Date: 19/02/16

#### **DMT Member**

Signed: PL Name: Phil Lightowler  
Job Title: Head of Public Transport  
Date: 19/02/16

**Equality Impact Assessment Action Plan**

<b>Protected Characteristic</b>	<b>Issues identified</b>	<b>Action to be taken</b>	<b>Expected outcomes</b>	<b>Owner</b>	<b>Timescale</b>	<b>Cost implications</b>
Age – older persons	Greater reliance on bus services heightens the impact of any service withdrawal or reduction on this user group.	Approach identified will seek to give greater priority and protection to services identified as carrying this user group. The Council will seek alternative solutions with bus operators and where necessary look to develop the Kent Karrier network to provide alternative transport.	To, where possible, protect services carrying this user group.	Steve Pay, Public Transport Planning and Operations Manager	Decisions to be made for implementation in the Summer 2016	£500k per annum if not materialising the measures required.
Disabled	Greater reliance on bus services heightens the impact of any service withdrawal or reduction on this user group.  Access to information about the consultation and any subsequent service changes which could be compromised by disability, most notably visual impairment.	Approach identified will seek to give greater priority and protection to services identified as carrying this user group. The Council will seek alternative solutions with bus operators and where necessary look to develop the Kent Karrier network to provide alternative transport.  The Council will ensure that disability does not prohibit	To, where possible, protect services carrying this user group.	Steve Pay, Public Transport Planning and Operations Manager	Decisions to be made for implementation in the Summer 2016	£500k per annum if not materialising the measures required.

		access to information through the engagement of appropriate representative groups and use of alternative formats.				
Carer	Greater reliance on bus services heightens the impact of any service withdrawal or reduction on this user group.	Approach identified will seek to give greater priority and protection to services identified as carrying this user group. The Council will seek alternative solutions with bus operators and where necessary look to develop the Kent Karrier network to provide alternative transport.	To, where possible, protect services carrying this user group.	Steve Pay, Public Transport Planning and Operations Manager	Decisions to be made for implementation in the Summer 2016	£500k per annum if not materialising the measures required.