

**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
17	C Chapman	January 2021	Updated to include analysis of user provision with Post 16 education sector

Author:

Craig Chapman – Interim Head of Fair Access

Updated 25/01/2021

Pathway of Equality Analysis:

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

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 instalments through 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. Providers are also encouraged to offer alternative support through bursaries where they feel this is appropriate.

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 through 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

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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: 21.01.21

DMT Member

Signed:

Name: David Adams

Job Title: Interim Director of Education

Date: 21.01.21

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. 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 2021/22 academic year and so there is no expectation that any associated risks will change.

Information and Data used to carry out 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.

- Current and future potential passholders
- Parents and Carers
- Schools, colleges and other learning providers
- Public Transport

These groups were 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.

It was promoted in the following ways:

- Emails to schools, FE providers and other stakeholders for circulation amongst school roll
- Emails to existing KCC 16+ Travel Saver pass users
- 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

A similar consultation will be held to discuss proposals for Post 16 Transport for 2021 intake. The EqIA will be reviewed in light of feedback from the consultation. This feedback will also be used to inform the following year's EqIA.

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The key demographics of current Kent 16+ Travel Saver users were examined, and further work was completed during the 2020/21 academic year to explore findings with Post 16 learning providers. This work is detailed below.

Feedback from 2020-21 Consultation

There was a total of 117 responses to the consultation questionnaire, a small increase on the 114 responses to the previous 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 selected more than one theme which explains discrepancy in numbers:

- Eligibility criteria for applying for support (selected 15 times)
- The 16+ Travel Card (98 times)
- Types of Travel Available (28 times)
- Another aspect of the policy (14 times)

Of these responses:

81.2% of responses were received from parents/carers

16.2% of responses were received from a pupil/student in Yr12 -14

0.9% of responses was received from a pupil/student in Yr7 – 11

0.9% of responses were received from a learning provider

0.9% of 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 most frequent response (28.6%) were from people that supported the 16+ Travel Saver pass, especially with the extended use at weekends and school holidays.

The second most frequent comment about the policy related to the cost of the card as too expensive (25%). 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.

The next most frequent comment related to the requirement for children to remain in education by law (23.8% 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. Direct 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.

16.7% 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.

3.5% 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.

A further 5.9% of responses requested that the scheme be adjusted to account for other forms of travel (eg, train) or remove off-peak travel.

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	56.4%
White Other	1.8%
Asian or Asian British: Indian	1.8%
Asian or Asian British: Other	1.8%
Black or Black British: Caribbean	0.9%
Black or Black British: Other	0.9%
Mixed: White and Asian	0.9%
Prefer not to say	0.9%

Following further development of the equality impact assessment (EqIA) through the consultation, it became clear that BAME families are under-represented in the uptake of the KCC 16+ Travel Saver pass, and this is mirrored in the response rate to last year's consultation. The EqIA action plan includes contingencies to address this in future consultations.

The following responses identified their gender as follows:

Male	8.6%
Female	55.6%
Prefer not to say	0.9%

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

Yes	3.6%
No	59.8%
Prefer not to say	1.8%

Analysis of 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.

This analysis identified that pupils eligible for free school meals and those from BAME backgrounds were not proportionally represented in the Kent 16+ Travel Saver cohort, so additional investigations took place through the 2020-21 academic year to identify what support these students were accessing.

A combined summary of these findings can be found below.

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 matched to the 2018/19 dataset and 5,148 matched to the 2017/18 dataset.

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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.

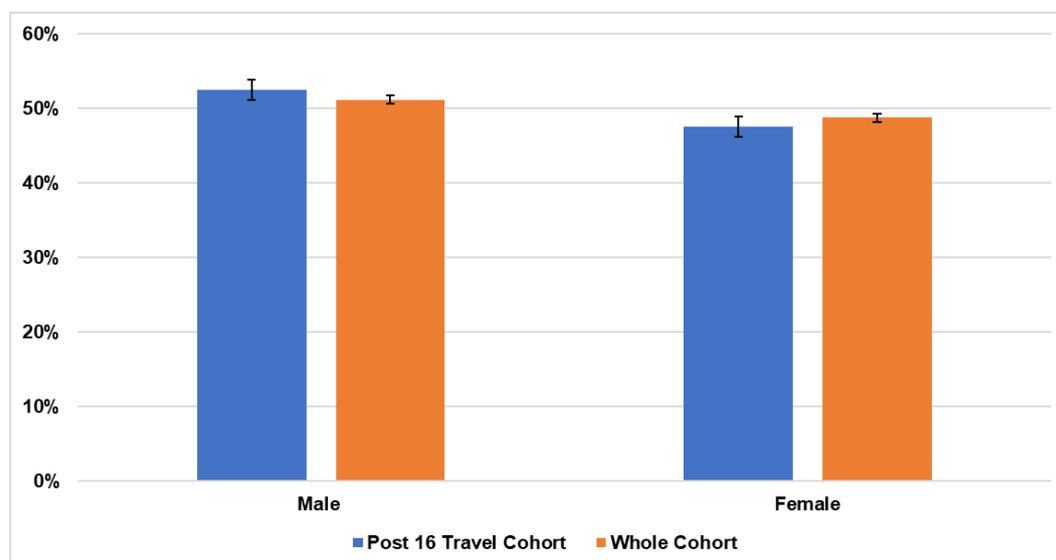
Demographics

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%	31,766	100%

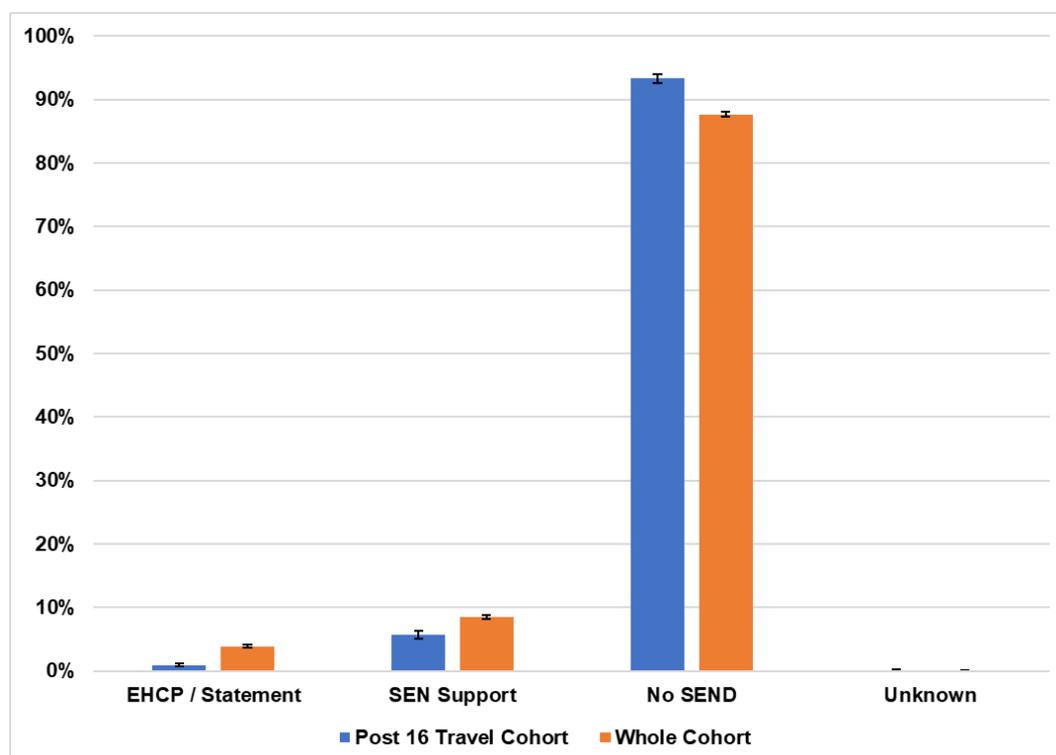


SEND

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 have received some or full support from KCC in relation to Post 16 transport compared to 17% of learners with no SEND.

Table 2 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%	31,766	100%

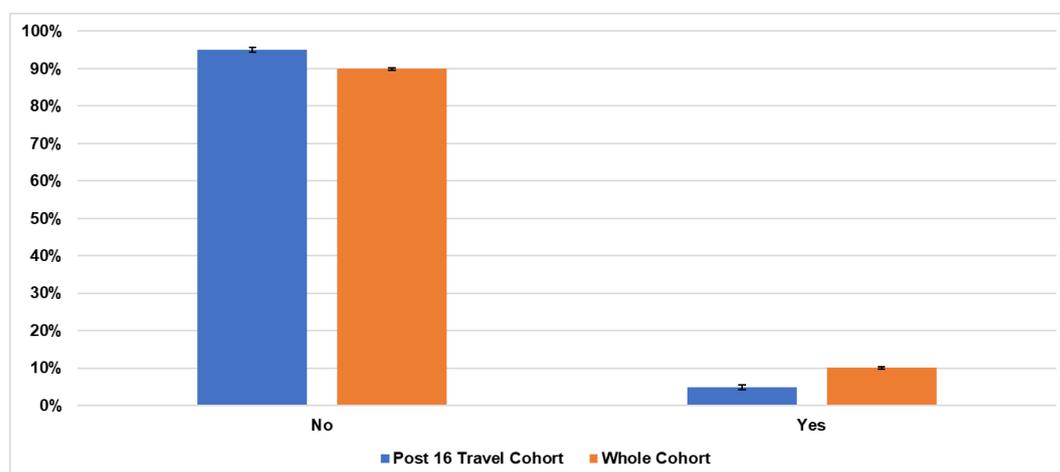


Free School Meals

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

Table 3 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%	31,766	100%



Post 16 learning providers are encouraged to make use of 16-19 bursaries to support learners from disadvantaged backgrounds to attend school or college, so work was undertaken to analyse what additional support may be available to those learners, which may account for this discrepancy.

Support varies between Colleges, but all provide bursary schemes which support pupils from low-income backgrounds. The qualifying criteria for these schemes are detailed below:

North Kent College

North Kent College Gravesend confirmed that due to its location, many students walk to college. Dartford campus also offers a free shuttle bus service from the train station to the college which runs regularly throughout the day.

- The bursary is available for students from households with an income £25000 and below
- Support is accessible to students travelling more than 1.5 miles from home to college (in case of Dartford campus – home to Dartford station)
- Bursary awards are tailored to the individual student and the award allocated will depend upon the course, where they live and how many days timetable to attend college. Colleges advise students to purchase Kent 16+ Travel Saver as it is the cheapest option.
- Arriva offer weekly, 4 weekly, termly and annual tickets to all students. Discounted price can be obtained by entering college's promotional code.
- Students over 18 receive a contribution to travel.

West Kent College

- The bursary is available for students from households with an income £25000 and below
- Travel support for those learners that live more than 2 miles from college
- If not eligible for KCC 16+ Travel Saver will receive funding based on cost of a 4 weekly/monthly ticket. Maximum funding for travel is £1500 per academic year

East Kent Colleges

- The bursary is available for students from households with an income £24000 and below
- Travel Support
- Arriva – Student Saver tickets – anyone in Post 16 full time education with a valid student ID
 1. Discounted fares
 2. Unlimited travel on all Arriva services in the specified zones all day, every day
 3. Choice of tickets – day, weekly, specific term, academic year
 4. Flexi day tickets – bundle of days that can be used at any time within 3 – 6 months
 5. Weekly tickets – valid from day of purchase and the following consecutive 6 days – not activated until first use
 6. 4 weekly tickets – valid from day of purchase and the following consecutive days – not activated until first use – top up is completed online
 - Stagecoach – Student Rider – academic year
 1. There are different prices for local areas and covering the whole South East Kent
 2. Day rider – unlimited travel for 24 hour period

3. Megarider – unlimited travel – choose zone and length of time of use and depends upon age. Cheaper options made available for under 19s

Mid Kent College

- Financial support for 16 – 18year olds
- The bursary is available for students from households with an income £28000 and below
- 19+ can apply to the Discretionary Learner Support Fund
- College provide Arriva bus tickets or train warrants which are renewed termly and subject to 90% attendance.

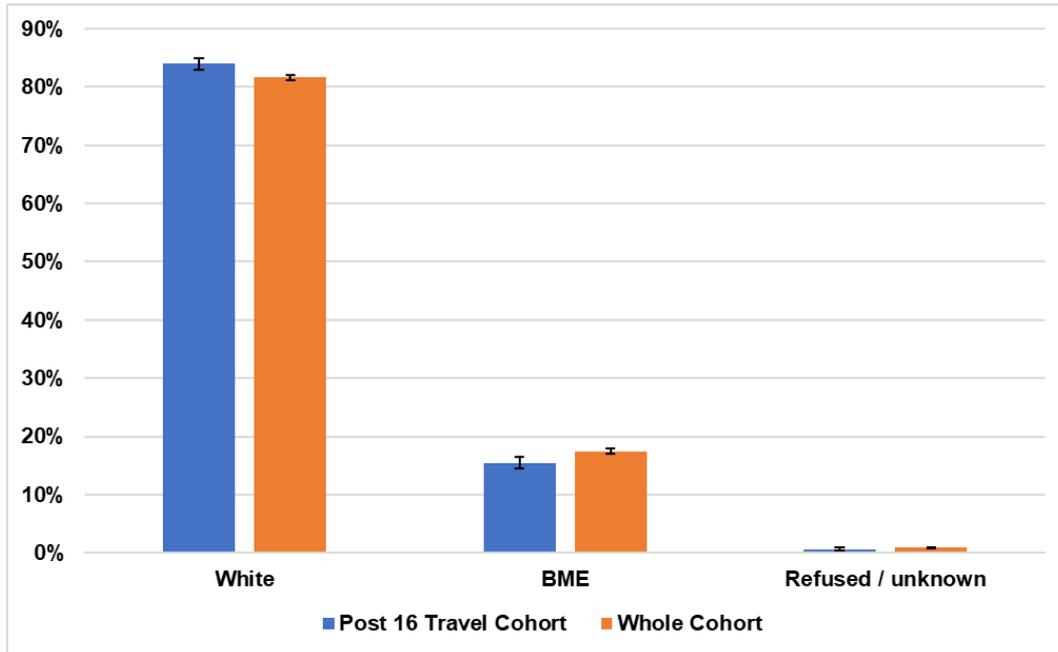
These localised offers likely account for much of the reduced uptake of Kent 16+ Travel Saver use in students from disadvantaged backgrounds. COVID-19 has limited the capacity of colleges to support further analysis of this group, however, work will continue to ensure that the 16+ Transport Policy Statement offers suitable options for all Free School Meals (FSM) eligible pupils, whether that is via Kent 16+ Travel Saver, learning provider bursaries or other discretionary schemes. Adjustments are scheduled for this year's 16+ Transport application process to allow demographic information to be collected more easily.

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 disproportionately fewer BAME pupils in the Post 16 travel cohort, than in the whole cohort.

Table 4 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%	31,766	100%



Requests were made to Post 16 learning providers to better understand whether this disparity is localised to particular areas, and what additional factors may be limiting uptake. The following data highlights local BAME proportions for colleges that provided responses:

Post 16 Provider	% of All Students
Ashford College	23%
Broadstairs College	14%
Canterbury College	12%
Dartford College	19%
Dover Technical College	12%
EKC Digital Learn	6%
Folkestone College	14%
Gravesend College	15%
Hadlow College	7%
EKC Into Work	31%
Sheppey College	5%
EKC Work Higher	6%
West Kent College	11%

Unfortunately, further analysis was disrupted by the impact of COVID-19 on learning provider and KCC Transport Officer workloads. This analysis will continue and will feed into future policy and equality impact assessment development.

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 and there is growing evidence that this is being supplemented appropriately by local college bursary processes.

Analysis of 16+ Travel Saver pass users has improved, however, COVID-19 has delayed planned work to more fully investigate why some groups are not making use of this option as widely as others.

Responses to last year's 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. Planned analysis will need to be completed, with the intention of the Service developing targeted interventions to improve engagement with the scheme and consultation.

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 and colleges have supported this work. Further planned analysis was postponed following the impact of COVID-19 of school/college workloads.

KCC will implement planned 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 if it is the best option for them.

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 demographic data of all service users	Better quality analysis on effect of the policy Focused consultation activity	Phil Lightowler/Craig Chapman	January 2022	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	September 2021	

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		strategies to increase uptake of the 16+ Travel Saver pass and involvement in future consultations				
Free School Meals (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	September 2021	

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