

Equalities Impact Assessment

Title of the Assessment:	Local Bus Services and Community Transport Interim Support Strategy	Date of Assessment	22nd Nov 2010
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Stage One – Aims and Objectives

1.1) What are the objectives of the strategy, policy or service being assessed?

The objective is to adopt a strategy for supporting local bus and community transport services in the face of corporate budget pressures.

1.2) What needs is it designed to meet?

The strategy will enable to Council to deliver a balanced budget in 2011-2012, whilst meeting the cost-effectiveness criteria contained in the Bus Strategy.

1.3) What outcomes will be delivered?

Direct financial savings (circa £540,000 annually) will be gained with the following proposed actions:

- Restrictions to the use of concessionary bus pass to the statutory minimum of 09.30am Mondays to Fridays, apart from disabled pass holders (saving £60,000 annually);
- Concessionary pass holders using dial-a-ride services be asked to make a £1.50 contribution per trip (saving £80,000 annually);
- Withdrawal of support for specific contracted bus services (saving £400,000 annually).

Further savings and efficiencies will be gained following:

- Delegated authority being assigned to the Director of Sustainable Communities (in consultation with the Portfolio holder for Safer and Stronger Communities and Healthier Lifestyles) to authorise exceptions to the criteria for use of the national concessionary pass, and to apply pre-agreed principles and evaluation criteria to future decisions regarding suitability of local bus services for public funding;
- Further development of the community transport sector in Central Bedfordshire, with a recommended annual investment of £100,000;
- Investigation of the business case for introducing a taxi-based service for designated rural communities;
- Dial-a-ride services be safeguarded with grant funding being maintained at its current level.

1.4) Which other strategies or policies support this?

Bedfordshire Local Transport Plan 2006/7 – 2010/11 (LTP2) and LTP3 (currently being completed).

Central Bedfordshire Community Transport Strategy (currently in preparation)

1.5) In which ways does this support Central Bedfordshire's intention to tackle inequalities and deliver services to vulnerable people?

The strategy being proposed is specifically designed to safeguard and enhance services provided by the community transport sector for marginalised individuals,

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which directly impacts on social inclusion. The dial-a-ride services are available only to people of reduced mobility who cannot access the conventional transport network, and so this initiative directly supports Central Bedfordshire's intention to tackle inequalities. The planned support for the community transport sector will enhance the capacity to provide for individuals and groups who are disadvantaged.

1.6) Is it possible that this could damage relations amongst different communities or contribute to inequality by treating some members of the community less favourably such as people from black and minority ethnic communities, disabled people, women, or lesbian, gay, bisexual and transgender communities?

There is no indication that this strategy would damage relations amongst different communities or individuals.

Local bus services are available to all members of the general public and, in principle, therefore, a reduction in service affects everyone equally. However, in practice, services are used primarily by people without access to cars. This includes young people, older people and families from lower income households. It is also the case that, despite potential mobility difficulties, disabled people do make more use of public transport than average. Finally, buses are used more by women than by men. Consequently, a reduction in bus service provision is likely to have a disproportionate effect on these groups, and therefore mitigating action is required. The impacts are likely to range from financial (more expensive alternatives), social (fewer social journeys, so greater isolation), economic (reduced access to employment opportunities), through to inconvenience (need to reorganise family support arrangements / walk further / longer to match the changes in bus availability). It is not thought that health will be significantly affected because of alternative services.

Community transport services are available to all qualifying individuals based on personal mobility and as such are a proactive initiative to enhance accessibility and freedom of movement for those who would otherwise be restricted. The nature of dial-a-ride (enshrined in transport legislation) is that it is closed to the general public and is exclusively focused on mobility disadvantaged persons as a means of redressing an inequality. The developing community transport strategy intends to widen the eligibility criteria and remit for the different community transport organisations so that they cover geographical and social disadvantage, in addition to mobility disadvantage relating to age or disability.

However, it should be noted that the strategy will seek to impose a differential regarding how the concessionary pass is applied to journeys using conventional services (restricting use on journeys before 9.30) and dial-a-ride (where a £1.50 fare is proposed). Consultation has established that 95% of dial-a-ride users are prepared to pay for what is in fact a premium service (door-to-door with a care element), and so largely neutralising the inequality.

Research has identified considerable unmet demand for accessible transport services by people unable under the current arrangements to access conventional bus services. This may reflect a combination of lack of service, excessive walking distances and vehicles with poor access. The maintenance of the dial-a-ride capacity and the planned additional support for the community transport sector will go some way to alleviating this disadvantage.

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Stage 2: Consideration of Relevant Data & Research	Refer to Equality Checklist (Pages 8-12)	
	Awareness	Accessibility
	Take Up levels	Staff Training Needs
	Appropriateness	Partnership - working
	Adverse Outcomes	Contracts & monitoring

2) What sources of evidence and key facts will be used to inform the assessment?

Service Monitoring / Performance Information Census & ONS	<input checked="" type="checkbox"/>	Demographic Profiles –	<input checked="" type="checkbox"/>
Place survey / Customer satisfaction data Analysis	<input checked="" type="checkbox"/>	Local Needs	<input checked="" type="checkbox"/>
National / Regional Research Research	<input type="checkbox"/>	Local	<input checked="" type="checkbox"/>
Best Practice / Guidance organisations	<input checked="" type="checkbox"/>	Benchmarking with other	<input checked="" type="checkbox"/>
Analysis of service outcomes for different groups Reports	<input type="checkbox"/>	Inspection	<input type="checkbox"/>
Data about the physical environment e.g. housing market, employment, education and training provision, transport, spatial planning and public spaces			<input checked="" type="checkbox"/>
*Consultation with Service Users Sector		*Consultation with Community / Voluntary	
*Consultation with Staff Complaints	<input checked="" type="checkbox"/>	Customer Feedback /	<input checked="" type="checkbox"/>
Expert views of stakeholders representing diverse groups Members	<input checked="" type="checkbox"/>	Elected	<input type="checkbox"/>
Specialist staff / service expertise	<input checked="" type="checkbox"/>		
The Transforming Transport in Central Bedfordshire review has recommended the strategy following extensive and comprehensive analysis of transport supply and demand, including specific work streams on public transport and community transport, incorporating concessionary fares issues. The above consultation areas were incorporated in the Transforming Transport project.			

2.1) Existing Data and Consultation Findings: Please give details below of data and consultation findings relating to:

- **Age:** The age of users is not a qualifying criteria for dial-a-ride, though the large majority of dial-a-ride users are aged over 65 because of the strong correlation between age and disability. [95% of the 429 respondents to the survey of dial-a-ride users undertaken as part of the development of this report, were aged 60 or over]. The strategy seeks to enhance community transport services which

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promote travel options for older people if their mobility is restricted. See also reference above to impact on concessionary pass holders, the majority of whom are older people. The withdrawal or modification of some subsidised bus services will affect older people in those rural locations affected. However, services that will be affected are those that are least well used, and new service developments proposed by the strategy will seek to offer alternatives.

Table 1 shows how bus use varies nationally by age and gender, emphasising the greater use made by women, and the surge in use that occurs from age 60. This has seen a marked increase since 2003. At that point, some 30% of those aged 60 or over used a bus once a week; by 2009 this had risen to 39%. Equivalent statistics are not available for Central Bedfordshire, although the overall volume of bus use will be significantly lower.

Table 1: Average Number of Bus Stages by Age & Gender (2009, GB) – National Travel Survey

	All ages	<17	17-20	21-29	30-39	40-49	50-59	60-69	70+
All	75	69	135	96	60	58	53	80	97
Males	64	64	116	89	48	49	42	64	77
Females	86	74	154	103	73	68	64	96	112

- Disability: Disabled people do make use of conventional bus services, even though this may cause inconvenience and pain. This reflects the correlations between disability and age, low disposable household income, and low driving licence holding. A major issue is the need to improve the accessibility of the vehicle fleet, as well as information and communication arrangements. The current proposals are neutral in this respect, although it is likely that the vehicles used on services to be withdrawn will have lower levels of accessibility than average. National legislation on local bus construction standards now requires new buses to be low floor and wheelchair accessible, with the result that high-floor inaccessible vehicles are slowly disappearing from the fleet. The major influence on the speed and location of this change is commercial decision-making by the major bus operator groups who favour urban and suburban networks.

The qualifying criteria for use of dial-a-ride is based on some restriction of mobility, and so the initiative largely seeks to enhance services for those with some form of disability. [82% of respondents to the dial-a-ride user survey reported that they considered themselves to be disabled.] The dial-a-ride services currently serve approx 1,000 individuals who undertake ca. 60,000 trips per year. However, detailed analysis undertaken during the Transforming Transport project (see Community Transport Improvement report, which contains figures at ward level) estimates that some 3,500 people in Central Bedfordshire have a locomotor disability that would mean that they would be eligible for dial-a-ride service. Thus the current level of capacity significantly fails to meet the potential need, and the proposed enhancement to community transport provision will improve the position.

As regards taxi alternatives, Central Bedfordshire is comparatively well off as regards accessible taxi availability. A recent national survey (Private Hire & Taxi Monthly – September 2010) reported that the Council is in the top 15% for accessibility, with 214 out of 244 (88%) licensed taxis being wheelchair accessible.

- Carers: The major impact as far as carers are concerned will be the enhancement to community transport services which seek to promote independent living, so there is a likely beneficial impact on carer support – less carer time is needed by users who are enabled by dial-a-ride to undertake more activities independently. There is no local statistical evidence, however, to support this statement, although dial-a-rides elsewhere in the country have collected data to back this view up. On the down side, some carers will be dependent upon bus services for their own purposes and potentially to do additional shopping and personal business tasks for the person being cared for. Reduction in bus service levels will make this more difficult.

- Gender: The two services affected (local bus services / community transport) are both used more frequently by women than by men. Table 1 above shows the differences as regards local bus service use. Additionally, it should be noted that males undertake longer journeys on average. However, the increased frequency of bus use by women does mean that women travel further overall by bus in a year – 403 miles as compared to 324 miles for men. There is no doubt that withdrawal of bus

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services in Central Bedfordshire will impact disproportionately on women.

To counter this, the proposals to maintain dial-a-ride and enhance community transport will disproportionately benefit women (76% of the respondents to the dial-a-ride user survey were women).

One of the issues to be considered is the extent to which community transport service availability can counter the difficulties faced by women who face personal security concerns when travelling. These services provide the added security of travelling with a known driver and potentially being assisted from door-to-door.

- Trans Gender / Gender Reassignment: The strategy refers to services which have no direct or specific impact on this equality area other than as a proportion of the whole community. There is no data to suggest that this is a local issue. Where individuals might feel unable to use public transport because of significant fears, then this would be likely to entitle them to access community transport services.

- Race: There is no data held regarding trends in bus use locally for different ethnic communities. Nationally, minority ethnic communities do make greater proportional use of public transport – the most recent Nation Travel Survey links this to a combination of where people live (public transport use is more common in urban areas) and car availability. The proportion of the population that is not 'white British' is lower in Central Bedfordshire (11% in 2007) than in England as a whole; excluding 'white other' brings that down to around 6%. An analysis using the published 2010 profiles of the wards likely to be affected by bus service withdrawal suggests that wards with less diversity are equally likely to be affected as those with more diversity.

As regards dial-a-ride use, the national figures show that people from ethnic minorities make far less use of dial-a-ride services than might be expected. This partly reflects the younger age profile of this group, with less need for accessible door to door transport, partly some stronger family support arrangements, but it also suggests that there are some hidden barriers to take up. Thus is it unsurprising that 97% of the dial-a-ride user survey respondents in Central Bedfordshire identified themselves as 'white British'. Ensuring improved take up within minority ethnic communities of the enhanced community transport services proposed will be included in the strategy proposals.

- Religion or Belief: The strategy refers to services which have no direct or specific impact on this equality area other than as a proportion of the whole community. Relatively little use is made of services to enable religious attendance or participation.

- Sexual Orientation: The strategy refers to services which have no direct or specific impact on this equality area other than as a proportion of the whole community.

- Other issues: e.g. *Poverty / Social Class / Deprivation, Looked After Children, Offenders, Cohesion*

Poverty: Bus services are, in general, used by people with lower disposable family income, although this is more pronounced outside urban areas. Moreover, the recent growth in concessionary travel has diluted this significantly. However, a number of recent studies (e.g. Passenger Transport Executive Group: The effect of bus fare increases on low income families) underline how the absence of affordable alternatives can amplify the impact of service withdrawals or above-inflation fare increases for these families. There are no local data on the income levels of bus service users; however, examination of the 2010 profiles of the wards likely to be affected by bus service withdrawal suggests that they have lower than average deprivation levels within Central Bedfordshire, which is itself significantly less deprived than the national average.

Dial-a-ride services are heavily subsidised by Central Bedfordshire (via core support for operators and individual passenger concessions) and so offer a premium service at a low cost to the user. There is a strong correlation between disability and low disposable income, so dial-a-ride users are potentially a vulnerable group. This means that the introduction of a £1.50 fare could deter some

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users of reduced means. The dial-a-ride users survey, however, suggests that this may only be an issue for around 5% of users.

Community cohesion: the community transport sector has a direct impact on cohesion by providing subsidised vehicles for VCF groups, and also providing volunteering opportunities.

2.2) To what extent are vulnerable groups experiencing poorer outcomes compared to the population or workforce as a whole?

Everyone in the population is disadvantaged when bus services are withdrawn. In this case, the groups most disproportionately affected will be women, children, older people and disabled people. The disadvantages will be mitigated to an extent by the extension of community transport services which will certainly benefit older and disabled people and which will provide a service for critical journeys (mostly health) and particularly isolated individuals. There are already some community transport services that specifically benefit children and young people in Central Bedfordshire, but there is a requirement that more should be done in future for this group, particularly to enable independent access to evening and weekend activities – bus service links are already poor in this respect. The group that will experience the most relative disadvantage from the proposed changes is likely to be women. Whilst some mitigating actions can be taken, this group is too heterogenous to provide for with general solutions.

2.3) Are there areas where more information may be needed?

It is not thought that additional specific information would assist in the immediate decision-making on these issues, beyond that gathered in the recent consultation. There is considerable national information on travel behaviour available, which can be interpolated effectively for local circumstances. Moreover, a number of more general surveys, such as Central Bedfordshire Place Survey, do set out local people's experiences with and aspirations for public and community transport.

The need for improved passenger usage data in respect of passengers who are travelling on those bus services that are financially supported by the Council has been highlighted in a report by the Transforming Transport team. Similar improvements in data gathering and analysis are identified from the review of the Council's relationship with community transport operators. The strategy will therefore see the necessary improvements in both these areas.

2.4) Are there any gaps in data or consultation findings?

See above as regards data gaps. Although there have been open workshops, much of the consultation has focused on existing and known users of both bus and dial-a-ride services. There is therefore a gap as regards knowledge of the needs of non-users. For bus services this can only partly be met by discussion with intermediate agencies such as bus user groups and parish councils. As regards dial-a-ride, the scale of the gap has been assessed by other means – the most critical action to close this gap would certainly be to expand and extend dial-a-ride capacity, as the experience of / perception of trip refusal (due to lack of capacity) acts as the biggest barrier elsewhere.

2.5) What action will be taken to obtain this information?

It is the intention of the Transforming Transport Team to draw up an engagement strategy for the medium and longer term that will provide for continuing consultation and engagement with the community (and operators) in respect of both local bus and community transport services. This engagement strategy will include specific content relating to the equalities issues considered here.

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2.6) To what extent do current procedures and working practices address the above issues and help to promote equality of opportunity?

As regards local bus services, the Council is working within a deregulated environment and therefore has a limited ability to influence the majority of service provision which is undertaken on a commercial basis. As regards the services it supports, the Council's procedures have been less than effective in a number of areas: a) the analytic framework for prioritising services was out of date (the Transforming Transport project has tackled this already); b) there was less data than needed to support analysis (ditto); c) engagement with the community was low (see above); d) performance management in respect of community transport was very limited (see above). Nevertheless, the general direction of travel as regards improving accessibility has been positive.

The ethos and approach of the dial-a-ride providers that the Council supports is already very inclusive, with equality training in place. However, dial-a-ride is in effect a rationed resource as capacity is often met before demand is fulfilled. Therefore the resulting inequalities primarily reflect demand outstripping supply rather than lack of inclusive practices.

Stage 3 – Assessing Positive & Negative Impacts			Refer to Equality Checklist (Pages 8-12)	
			Awareness	Accessibility
			Take Up levels	Staff Training Needs
			Appropriateness	Partnership - working
			Adverse Outcomes	Contracts & monitoring
Analysis of Impacts	Impact Yes	Impact No	Summary of impacts and reasons for this	
3.1) Age	✓		Positive: Services targeted at older people with mobility impairment will be safeguarded and enhanced. Negative: use of concessionary passes will be restricted before 9.30am. Dial-a-ride users will pay £1.50 fare per trip. Some older bus users will lose services.	
3.2) Disability	✓		Positive: Services targeted at disabled people will be safeguarded and enhanced. Unrestricted use of concessionary passes by disabled people will be safeguarded. Negative: Dial-a-ride users will pay £1.50 fare per trip. Some disabled bus users will lose services.	
3.3) Carers	✓		Positive: carer dependency is reduced and independent living to enhanced by dial-a-ride.	

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3.4) Gender	✓		Positive: women make up the majority of dial-a-ride users who will benefit from safeguarded and enhanced services. Negative: Women make up the majority of bus users, and some will lose services.
3.5) Transgender		✓	No specific positive or negative impact
3.6) Race		✓	No specific positive or negative impact
3.7) Religion / Belief		✓	No specific positive or negative impact
3.8) Sexual Orientation		✓	No specific positive or negative impact
3.9) Other e.g. . <i>Poverty / Social Class/Deprivation, Looked After Children, Offenders, Cohesion</i>	✓		Positive: Community transport enhances community cohesion by providing subsidised transport resource to VCF groups, and providing volunteering opportunities.

Stage 4 – Conclusions, Recommendations and Action Planning

4.1) What are the main conclusions from the assessment?

Withdrawal of local bus services is not a pain-free option and will disadvantage bus service users disproportionately. Although these services are 'public', the service user profile is weighted towards women, children, older people and disabled people, all of whom will, depending upon where they live, be disadvantaged. The withdrawal/reduction is being targeted at services that are the least used, so numerically the impact will be small. However, for the individuals affected, the impact may be significant. Consequently, a mitigation strategy is required.

The local bus service concessionary travel pass users consist of two groups – older people and disabled people. No changes are proposed that affect the latter. The former will experience some disadvantage by not being able to travel before 09.30 without payment; less than a quarter of those responding to the concessionary pass holders survey suggested that this would cause major or significant inconvenience and/or expense. Some mitigation is proposed that will exempt critical services (e.g. single service from a village) that start just before the 09.30 threshold from being included in the list. Moreover, people will still be able to use the services by paying a standard bus fare, so in most cases this will create a financial rather than an access disadvantage.

The proposal to introduce charges for pass holders on dial-a-ride services is supported by 95% of those users who responded to the surveys. The charge is set at the median level suggested by service users. It will still represent a significant saving on the actual cost of provision and be cheaper (in most cases) than adult bus fares and much cheaper than equivalent taxi or private hire fares.

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The proposal to extend and expand community-based services will go some way to mitigate against the effects of bus service withdrawal, particularly as regards the impact on older and disabled people and, to an extent, children. It is understood that these proposals will include improved marketing which should improve take-up amongst hard-to-reach groups.

4.2) What are the priority recommendations and actions?

The proposed strategy seeks to contribute to the Council delivering a balanced budget. It has considered the impact of withdrawal on different groups and established some mitigation actions that will minimise the impact.

The recommendations therefore are:

- a) to proceed as rapidly as possible with the community transport development strategy so that it can start to have an effect at the time that financial support for bus services is proposed for withdrawal
- b) to continue implementing the recommendations contained in the Transforming Transport team report on arrangements in respect of bus service procurement (primarily to ensure better data is gathered, but also to create a better prioritisation tool)
- c) to implement the recommendations contained in the Transforming Transport team report on support for community transport services (primarily to ensure incentives to improve outputs and outcomes)
- d) to undertake an equality impact assessment as part of assessment of the business case for introducing a taxi-based 'safety-net' service
- e) to develop a medium and longer term community engagement strategy in respect of bus and community transport services that will include consideration of equality issues.

4.3) What changes will be made to address any adverse impacts that have been identified?

The recommended actions are designed to enhance the proposed mitigation against adverse impacts.

4.4) Are there any budgetary implications?

None

4.5) Actions to be Taken:

Action	Date	Priority (high / medium low)
Engagement with operators and community agencies on community transport strategy	Now	High
Introduce improved administrative arrangements in respect of bus service support,	To match the development of LTP3	Medium
Introduce output-based support for community transport services	During 2011/12	Low
Develop a community engagement strategy	Now	Medium

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**Stage 5 Quality Assurance & Scrutiny:
Checking that all the relevant issues have been identified**

5.1) What methods have been used to gain feedback on the main issues raised in the assessment?

Checks have been made with:

Step 1:

- The Corporate Policy Advisor (Equality & Diversity) for comment & decision re further scrutiny

Step 2:

- The Equalities Working Group - The Equalities Forum

- Other *Please give details e.g. LGBT Network:*

5.2) Were any additional actions / amendments identified?

Surveys were carried out with concessionary pass holders and with dial-a-ride users to ascertain the response to the changes being proposed. Consultation has been made with community transport operators, and with intermediate agencies. Four general consultation workshops were delivered. National and comparative data on bus service use, concessionary travel and dial-a-ride use has been examined.

The Equalities Forum highlighted the following issues:

- 1) The difficulties disabled people experience using public transport and the competition for space with mothers and push chairs.
- 2) The important contribution that services such as dial a ride and voluntary parish Council schemes make in rural areas to increasing accessibility and inclusion. The quantity of existing informal village arrangements is often not included when demand for transport services is considered
- 3) The need to improve the integration of existing services and widen the scope of services to improve viability. The travel needs of young people and CBC staff could be considered as part of this approach.
- 4) The important role that transport services play in supporting statutory agencies to meet the Disability Equality Duty by promoting improved access to opportunities and services.
- 5) The role that transport services play in supporting the achievement of a variety of Council strategies such as Healthier Communities, Prevention Strategy, Children and Young People's Plan, Customer Service Strategy Local Economic Assessment etc
- 6) The need to identify the full extent of community transport services operating locally e.g. health services transport provision
- 7) The need to invite a broad cross section of people / groups to the consultation workshop
- 8) A restriction in the times that concessionary passes could be used might have a negative impact on access to employment opportunities and hospital appointments.

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The Forum:

- supported the approach being taken towards consultation with a variety of groups
- welcomed the opportunity to consider the Equality Impact Assessment at it's meeting in December
- supported the need to build the capacity of local Community Transport operators.

Stage 6 – Monitoring Future Impact

6.1) How will implementation of the actions be monitored?

The Head of Integrated Transport will be responsible for ensuring that the agreed actions are implemented.

6.2) What sort of data will be collected and how often will it be analysed?

Output data from dial-a-ride operators is collected and monitored on a monthly basis. Electronic ticket machine data will be gathered and analysed in respect of local bus service use. Concessionary pass use will continue to be subject to a sampling regime (required to calculate reimbursement).

6.3) How often will the policy be reviewed?

Annually

6.4) Who will be responsible for this?

The Head of Integrated Transport

6.5) Have the actions been incorporated in the service / business plan or team targets?

The Integrated Transport Unit is being established at the moment, and the linked plans and targets are in development. The recommended actions have already been discussed with the Head of Integrated Transport.