



Equality Impact Analysis: (EIA)

Section 1: Introduction

Name of Proposal Travel Assistance Policy 2020

For the purpose of this document, 'proposal' refers to a policy, function, strategy or project)

Service area & Directorate responsible Integrated Commissioning, Children and Culture

Name of completing officer Elizabeth Freer

Approved by Director/Head of Service Anthony Harris

Date of approval 28/08/2020

Conclusion - To be completed at the end of the Equality Impact Assessment process

This summary will provide an update on the findings of the EIA and what the outcome is. *For example, based on the findings of the EIA, the proposal was rejected as the impact on a particular group was disproportionate and the appropriate mitigations in place. Or, based on the EIA, the proposal was amended and alternative steps taken)*

Based on the EIA, the proposal complies with the council's statutory duties regarding providing Travel Assistance. However, as this will involve a change for some children, parents and families, there is a risk that it may negatively impact some parents, especially those who are working and reliant on their child being taken to school or those with more than one child.

However, this risk may be removed or reduced by implementing the actions detailed within the *Action Planning* section of this document.

See
Appendix A
Current
decision rating

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them

Where a proposal is being taken to a Committee, please append the completed equality analysis to the cover report.



This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Section 2 – General information about the proposal

Provide a description of the proposal including the relevance of proposal to the general equality duties and protected characteristic pursuant to Equality Act 2010.

Historically, Tower Hamlets has had a range of policies and statements across Children and Adult services in relation to access and delivery of Travel Assistance. As a consequence of a project undertaken with the support of Grant Thornton in 2019, council officers from four Directorates (Place, Children and Culture (C&C), Resources and Health, Adults and Communities (HAC)) have been working on improving the council's performance with regard to promoting independence and securing improved value for money.

As existing policies were broadly fit for purpose, the task became one of collating current policies, ensuring there was an overarching narrative for Travel Assistance in Tower Hamlets, and for a single policy to be signed off via Cabinet. It was presumed large scale changes to existing policies would be required to facilitate proposed changes to the way Travel Assistance is delivered; primarily in relation to SEND Home to School travel. Having collected and reviewed the range Travel Assistance policies/statements from across C&C & HAC it became clear current localised policies already had accurate, up to date and appropriate content; and therefore, sweeping changes have not been required.

The primary outcomes expected by the successful implementation of a new policy are twofold:

1. Promote greater independence, choice and freedom for children, families and adults requiring Travel Assistance
2. To formally introduce a broader range of Travel Assistance options which are more cost effective than the traditional offer which has focused on utilising the inhouse fleet and external taxis.

In addition, a key driver for revisiting the Travel Assistance policy in relation to SEND home to school transport is the increased demand and expenditure year on year which, if left unattended, would become an unmanageable financial pressure.

Councils have a legal duty to provide transport assistance to eligible children and young people. For adults, local authorities have a legal duty to ensure any eligible social care needs identified through a Care Act assessment are met, which for some individuals might relate to transport.

They must provide such free home to school travel arrangements for compulsory school-age children that it considers necessary to facilitate the attendance at school of eligible children resident in their area. There are four categories under which children can be eligible:

- statutory walking distances;
- special educational needs, disability or mobility problems;
- Unsafe walking route; and
- extended rights

A council has a discretionary power to provide home to school travel for children resident in the area who are



not eligible children. It may, for example, use this discretionary power to:

- provide free home to school travel to children who are not eligible children
- provide home to school travel for children who are not eligible children for which parents are charged a reduced rate.

There is no legal requirement for local authorities to provide travel assistance beyond the completion of Year 11. However, they have a duty to prepare and publish an annual transport policy statement specifying the arrangements for the provision of transport, or otherwise that the authority considers necessary, to facilitate the attendance of all persons of sixth form age receiving education or training.

Without exception, parents and carers have a (legal) responsibility to ensure that their child/ children attend school regularly, regardless of the child's special educational needs or disabilities.

For adults, councils have a legal duty to ensure that social care needs that meet the 2014 Care Act eligibility threshold are met.

In Tower Hamlets, travel assistance has historically often been offered via the Council-owned fleet of buses managed by the Transport Services Unit (TSU), or through private hire vehicles (e.g. taxi's) organised through the TSU. Overall, demand for travel assistance has grown in the last four years. Since 2015/16, SEND and social care passenger numbers have collectively grown from approximately 1,000 passengers to almost 1,200 in 2019/20, increasing the associated costs by 38%, from £5.7m to £7.6m. These increases have added further strain to service areas that already under significant pressure from cost and demand growth. Passengers for the internal fleet and external private hire vehicle service have grown at different rates. In total, all TSU passengers have grown by 2%, while passengers using the private hire vehicle framework have risen by almost 10%.

In line with an overall increase in demand, TSU service costs have increased by 16% over the last four years from £3.8m to £4.5m, and external transport (i.e. private vehicle hire) costs have increased by 66%, from £1.9m to £3.9m. The Children and Culture directorate has experienced the most significant growth during the period, with total service users growing 11%. Considering these challenges, the council commissioned an external strategic review of SEND and Social Care Transport, resulting in a revised draft Travel Assistance Policy.

This new Travel Assistance Policy brings together and supersedes existing travel assistance policies that exist in the Children and Culture Directorate and in the Health, Adults and Communities Directorate. The new policy will apply to adults with social care needs and all children and young people who are residents in Tower Hamlets, or in the care of the Council and are of statutory school age, or up to age 19 in the case of young people with an Education, Health and Care Plan (EHCP).

This EA is based on the revised Travel Assistance Policy, which aims to promote the independence of children and young people with special educational needs, and adults with eligible social care needs. A summary of the changes for children and young people with SEND are set out below. The service will be unchanged for those with Adult Social Care (ASC) needs.

The council wants to ensure that the new Policy has an overall beneficial impact on life chances and promoting independent living for all children and young people with SEND and people with disabilities in the borough by enabling access to opportunities and strengthening community cohesion.

Summary of changes for travel assistance - children and young people with SEND

There will be no change in the service provided for those with the most complex needs. This will comprise pupils at Stephen Hawking School, Beatrice Tate School, most pupils at Phoenix School and at independent special schools.

As of January 2020, 838 children and young people up to age 19 who have an EHCP received travel



assistance in Tower Hamlets. Over 80% of these lie within the 5 to 16 years age band (see: table 1), and the council has a statutory duty to offer travel assistance to all who are eligible.

Table 1. Children Receiving Travel Assistance (by age group)

Age group (years)	Number
Under 5	46
5 to 16	673
16 to 19	119
Total	838

Nearly three quarters of the children and young people who receive travel assistance attend a special school or college unit

Table 2. Children Receiving Travel Assistance (by type of school)

School phase	Number
Early years - mainstream	14
Early years - special	32
Primary mainstream	137
Secondary mainstream	70
Special school (5 to 16)	466
Aged 16 – 19: mainstream school / college	21
Aged 16 – 19: special	98
Total	838

The changes below will apply to those who do not fall into the categories above:

- 1) Promote independence – the new policy will be based on the overall principle that travel assistance should aim to help children and young people with SEND to be as independent as possible. It is proposed that this will be achieved by:
 - Offering more travel assistance options such as Personal Travel Budgets (PTBs) and travel cards for child and carer
 - Increase in Independent Travel Training (ITT)
 - Provision of information about how to build a child’s confidence on using public transport and getting around
- 2) Invest in updating council vehicles and other improvements to them
- 3) Publication of information about new personalised assessments – how to apply, how children are assessed and reviewed and how to appeal
 - Information will be made available on the council website and on the Tower Hamlets Local Offer
- 4) Only a child’s needs for assistance will be assessed – in most cases if it is assessed that a child needs to be accompanied on their journey to school this should be by a parent or carer, unless there are exceptional circumstances. Exceptional circumstances can include because a child is taken into care or continuing at the named school is strongly in doubt without assistance
- 5) Offer of Personal Travel Budgets (PTBs) - a payment to a parent or carer so they can arrange their own child’s home to school travel
 - PTBs are worked out by the council using information such as - the cost of a local taxi firm, the



child's travel assistance needs and the cost of a contracted taxi firm

- Ways to use a PTB include
 - Paying for a taxi / Uber
 - Paying another person to travel with your child
 - Purchasing travel pass(es) for a parent or another adult to accompany your child on bus or DLR
 - Paying for childcare for another child whilst a parent collects their child with SEND
- 6) Changes for some under 5 year olds – more families having Oyster travel pass (zones 2 and 3) or a PTB
- For new applications and on review – options of a PTB for families whose children attend other nurseries or schools or an Oyster travel pass (zones 2 and 3) to travel with a child to and from school
- 7) Changes for some 16 to 19 year olds – more young people having Freedom and Oyster travel passes or
- Young people attending FE college or a mainstream school to apply for a Freedom Pass, plus a bursary (which are provided for 16 to 19 year olds) and/or make use of their Personal Independence Payments (PIP) mobility component.
 - For new applications and on review - options (whenever possible) of:
 - ITT and a PTB
 - Freedom Pass plus Oyster Pass for a carer to accompany a young person to and from school or college
 - Taxi place or Council bus place will be offered where the above are not suitable
- 8) Travel assistance only for core school day – for those who want additional flexibility for attendance at out of school clubs and transition arrangements there will be the option of applying for a PTB.

Section 3 – Evidence (Consideration of Data and Information)

What evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

Equality has been a key principle throughout the development of a Travel Assistance Policy for Tower Hamlets. The policy exists to ensure children and young people with SEND and people with disabilities in Tower Hamlets have access to education and services on an equal basis to others and that an inability to travel independently does not act as a barrier to access opportunities.

In developing the policy, we have ensured that proposals fully comply with the requirements of the Equality Act 2010, including the Public Sector Equality duty (PSED), as travel assistance service is accessible to all eligible users based on need and ability to travel independently, as opposed to any of the protected characteristics specified in the 2010 Act. In addition, an exemption in Part 2 of Schedule 3 of the Act, allows for local authorities to arrange transport on the basis of age and religion and belief which means it is lawful for LBTH to arrange a bus to a faith school but not to another school in the area, if they wish to.

The proposed policy demonstrates due regard to the PSED by ensuring it will have an overall beneficial impact on life chances and enabling access to opportunities and strengthening community cohesion, regardless of protected characteristic.



The draft travel assistance policy is consistent with the council's duties in respect of the provision of transport services for children and adults in need of care and support. The key duties which must be taken into consideration are outlined below.

The council has taken into consideration its general duty under section 508A of the Education Act 1996 ('the Act') to promote the use of sustainable travel and transport to and from schools.

The council has also taken into consideration Section 508B of the Act which places a duty on the council to make such travel arrangements as it considers necessary to facilitate attendance at school for eligible children. Section 508C of the Act provides the council with discretionary powers to go beyond its statutory duties and provide transport for children who are not entitled to free transport. This includes consideration of paying the reasonable travel costs for a person to escort the child to and from school.

In respect of compulsory school aged children, the council has complied with the statutory guidance "Home to school transport and travel support to education and training" published in July 2014 ("the guidance").

Additionally, the council has a duty under sections 508F and 508G of the Act to publish a transport policy statement for young people of sixth form age and adults aged 19 and over (including those with an Education, Health and Care (EHC) plan) in education and training. The Council also has due regard to the statutory guidance "Post-16 transport and travel support to education and training" published in January 2019.

Under section 8 and 18 of the Care Act 2014, the council has a duty to meet the eligible needs of an adult in need of care and support, which may include services such as transport. The council also has regard to the care and support statutory guidance, updated in October 2018. The draft policy also adopts Article 2 of Protocol 1 of the European Convention on Human Rights (ECHR) which gives parents the right to have their children educated in accordance with their religious and other views, including section 509AD of the Education Act 1996 which requires local authorities to have regard to any wish of a parent to have their child educated at a school based on their religion or belief when exercising their home to school transport duties.

A range of evidence informs the Travel Assistance Policy, including:

- Census 2011
- GLA Housing Led Population Projections, 2016
- Ordinance Survey 2017: Tower Hamlets
- SEND/ASC Segmentation Evidence, Grant Thornton 2019
- Tower Hamlets Borough Profile 2018
- Travel Assistance for Children and Young People with SEND: consultation findings and recommendations 2020
- User data by type, age & disability

A programme of pre-engagement activities and consultation on the suggested proposals with affected groups and residents was carried out before the formal consultation. Pre-consultation consisted of six engagement meetings with groups of parents and carers and young people with SEND around eight broad themes:

- Overall views on travel assistance
- Independence and independent travel training
- Possible changes to discretionary arrangements for: under 5s or post-16
- Personal travel budgets
- Service improvements and developments
- More information about and changes to assessments
- Transport provided for the core school day
- Other issues.



Groups who took part included: Our Time young people with SEND group, members of the Tower Hamlets Deaf Children's Society and the School Travel Advisory Group (STAG). The discussions and comments helped to shape the detailed proposals for changes to travel assistance that would then be consulted upon.

Plans for the consultation considered information about current service users and groups most likely to be affected, as well as ensuring that residents and all those with an interest in the proposals could share their views.

The formal consultation took place between 26th February and 11th May 2020, following several weeks of pre-consultation and evidence review. The eight proposals that the London Borough of Tower Hamlets sought views on were as follows:

1. Promoting independence, as a guiding principle
2. Making improvements to adapted buses
3. Implementing new personalised assessments
4. Assessments for travel assistance to be focused on the child's needs
5. Personal travel budgets for more families of children / young people with SEND aged five to 16
6. Personal travel budgets for more families of children with SEND aged under five
7. Personal travel budgets for more families of young people with SEND aged 16 to 19
8. Adapted bus or taxi for the official school day only.

The original plans and activities for the consultation had to be adapted due to the national response to the covid-19 pandemic, which prevented most face-to-face consultation meetings. Instead an extensive, targeted, phone campaign for families of children in receipt of travel assistance was carried out. Over 400 calls were placed, which contributed to a total of 124 responses to the online survey. The recommendations that then informed the revised Travel Assistance Policy were formulated as a result of what was a broadly positive response to the online survey, together with insights from discussions with parents of children with SEND and young people with SEND, mostly during pre-consultation.

Name of officer completing the EIA: Elizabeth Freer

Service area: C&C SPP

EIA signed off by:

Date signed off:



Section 4 – Assessing the impacts on residents and service delivery

	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Age (All age groups)	X			<p>The new Travel Assistance Policy complies with its statutory duties, outlined above, to provide free home to school travel arrangements for compulsory school-age children and to promote the use of sustainable travel and transport to and from schools</p> <p>Tower Hamlets also has a strong offer of help with their journey to and from school for children and families who are residents:</p> <ul style="list-style-type: none"> • under 5s travel free on all public transport • all children aged 5 to 16 can have Zip Oyster card for no cost or low-cost public transport • there is access to the subsidised London Taxi Card scheme • the Freedom Pass scheme for which many young people aged over 16 with an EHC plan use • independent travel training at no charge children and young people who are eligible • for 16 to 19 year olds with SEND at school or college, there is access to a bursary scheme that can include some assistance towards the cost of daily travel • administration of the national ‘Blue Badge’ scheme for cars, which includes parents and carers of children who have great difficulties walking or are at risk of serious harm to themselves or others when walking (DfT 2019). <p>Many families of children with an EHCP also access additional support from Government as part of Disability Living Allowance or their Personal Independence Payment (PIP).</p>

				<p>It should be noted that changes will be limited for service users with the most complex needs. This will comprise primarily of pupils at Stephen Hawking School, Beatrice Tate School, most pupils at Phoenix School and at independent special schools. However it should be noted that no one is fully exempt from due process of reassessing individual needs.</p> <p>Children under 5</p> <p>There may be some under 5s (therefore not of compulsory school-age), currently receiving a form of travel assistance such as private taxis who will be given an Oyster travel pass (zones 2 and 3) or a PTB instead. These children are likely to be accompanied to school by a parent/carer (more information on the impact on parents/carers can be found below). This will not only begin to empower and create an awareness of independence in the children with SEND, it will empower and promote the independence of the adults who accompany them, if said adults are not used to travelling independently either. It will also comply with the council's duty to promote the use of sustainable travel and transport to and from schools.</p> <p>In addition, the SEND service for children has a 2-year savings target to achieve. If the proposals are not implemented, the achievement of this savings target would be at risk, thereby placing a pressure on the service and its statutory duties which, in the long term, could adversely impact more children than those who currently receive travel assistance. Indeed, during the consultations, some parents of children with SEND acknowledged that travel assistance is a valuable support for them and, if under pressure, should concentrate on continuing to help their children get to and from school.</p> <p>Young people aged 16 to 19 years old who attend Further Education or a mainstream school</p> <p>Young people aged 16 to 19 years old who attend Further Education or a mainstream school will have a range of options available. They will be attending college/school with other young people and this age group are likely to be socialising in more independent ways and exploring ways to be more</p>
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				<p>independent in day to day life. The proposals will have a positive impact by providing increased opportunities to travel with peers and develop life skills to help support independence. As set out in the proposals above, this will include a range of travel assistance options and ITT to support transition. A taxi place or council bus place will still be offered if the alternatives are not suitable for an individual.</p> <p>During consultation activities these proposals were explored with parents and carers and children and young people from all the age groups above to identify the there are any other issues that need to be considered and to ensure that the proposals can work effectively for people accessing the service. Young people with SEND were very vocal about the importance of supporting them to be independent in getting out and about in Tower Hamlets and beyond.</p> <p>They strongly expressed the view that independence should lie at the core of any travel assistance policy and all who had accessed independent travel training talked positively about their experiences. They made suggestions for ways that young people with SEND could continue to be supported and grow in confidence as they use public transport as well. For the older young people, this has enabled them to access work-related training and work experience and have more say about their social lives.</p>
<p>Disability (Physical, learning difficulties, mental health and medical conditions)</p>			<p>X</p>	<p>All Travel Assistance service users will have SEN and/or a disability and therefore all are potentially affected by these proposals. As there will be no change in the service provided for those with the most complex needs the impact for this group is minimal.</p> <p>For the remaining service users, a new option to provide travel assistance may be agreed with the parent/carer, but travel assistance will not be withdrawn from anyone.</p> <p>As set out above, the overall principle of the new policy is to have a positive impact by helping children and young people to be as independent as possible. Regular annual reviews and quality assurance checks for all successful</p>



				<p>applications for home to school transport will improve the current service and support.</p> <p>Support will be provided for children, young people and their families making a transition to a new travel assistance option including information for each step, independent travel training and information on how families and schools can build children's/young people's confidence on public transport and getting around.</p> <p>SEND Users</p> <p>The number of SEND transport users fluctuates week to week (it ranges from approx. 800-900 users). At any one time, around 13% are wheelchair users.</p> <p>For SEND transport users, a wide range of users may be impacted by the draft policy, with users having Autism Spectrum Disorder, Speech, Language and Communication needs and Social, Emotional and Mental needs the most likely to be affected.</p> <p>Councils are advised that "when making transport arrangements for children with special educational needs, a disability or mobility problems, they will need to identify and take account of their particular needs and ensure that the transport they provide meets those needs. For example, children with a high level of need might require the support of a passenger assistant on their journey, or if a child uses a wheelchair, walking frame or other mobility aid, it may need to be transported with them." The revised Travel Assistance Policy take this into account.</p> <p>In addition, the Taxi Card scheme subsidises the cost of taxis for people with serious mobility problems who cannot use public transport, and the Dial-a-ride service is wheelchair accessible, both of which are included in the Travel Assistance Policy and are suitable for ad-hoc journeys.</p>
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				<p>ASC Users</p> <p>As there is no change proposed for ASC users, there is no impact on adults with a disability.</p>
Sex			X	<p>We expect the revised Travel Assistance Policy will have no disproportionate impact on gender, as the primary eligibility criteria for travel assistance is based on need and ability to travel, which is not linked to gender.</p> <p>However, as almost 70% of service users are boys, this group is more likely to be affected by any changes than girls. As aforementioned, all users should benefit from the proposed changes, by gaining more autonomy and independence, learning about personal safety and road safety, as well as managing money, recognising landmarks and learning what action to take if things go wrong – all skills which help a person mature and allow them to explore the wider world. It raises aspirations and allows young people to have a social life and meet friends or attend clubs without needing an adult in the future.</p> <p>There could be a potentially disproportionate impact on women as it is anticipated that they are more likely to be the main carers for children and are often responsible for managing the journey of their children to and from school. The draft policy is likely to result in more families taking up a new travel assistance option where someone is required to accompany a child to school. We intend to mitigate this possible impact by increased engagement and consultation with service users to ensure we identify any potential issues and work with them to find ways to ensure the offer works for them. It may also create more part-time job opportunities for women.</p> <p>When implementing, the council should monitor the impacts closely, reporting changes in the number of appeals to travel assistance assessment decisions and involving parent representatives more actively.</p>
Gender reassignment			X	<p>We do not have any data on gender reassignment for service users or their parent / carers and families but do not expect the proposal to have any adverse impact in relation to this protected characteristic as the proposal intend to</p>



				<p>benefit all eligible users.</p> <p>Systems for collecting data on protected characteristics will need to be reviewed and this is addressed in the associated action plan.</p>
Marriage and civil partnership			X	<p>We do not have any data on the marriage or civil partnership status of older service users or their parent/carers and families but do not expect the policy to have any adverse impact on those with this protected characteristic. This protected characteristic does not form any part of the eligibility criteria and therefore does not impact on decision making.</p> <p>Systems for collecting data on protected characteristics will need to be reviewed and this is addressed in the associated action plan.</p>
Religion or philosophical belief			X	<p>We do not have any data on religion or belief for service users or their parents/carers and families but do not expect the proposal to have any adverse impact in relation to this protected characteristic as the primary eligibility criteria for travel assistance is based on an ability to travel more independently, rather than religion.</p> <p>Indeed, the policy continues to enable children to be transported to a faith school if requested and the Council considers the request to be feasible.</p> <p>Systems for collecting data on protected characteristics will need to be reviewed and this is addressed in the associated action plan.</p>
Race			X	<p>User data available by race has an element of variability, owing to parents being given free text to input their ethnicity, rather than being provided with a list of options that corresponds to Census headlines. For example, many children are recorded as “Asian” rather than Indian/Pakistani/Bangladeshi.</p> <p>This aligns with the fact that 230 individual ethnicities were recorded amongst residents during the 2011 Census, meaning the borough is highly diverse. This is the 19th highest number recorded in England and Wales and 7th highest in Inner London.</p> <p>Bangladeshi residents are the largest single ethnic group in Tower Hamlets,</p>



				<p>accounting for around one in three residents (32%) at the time of the 2011 Census. This was the largest Bangladeshi population in the country, by far. The second largest ethnic group was White British, making up 31% of the population. 'White Other' was the third largest ethnic group, at 12%.</p> <p>The proportion of non-white British ethnicities is now 69%, compared to 58% across Inner London and just 20% in England. This is the 5th highest proportion in England and Wales, and 3rd highest in Inner London.</p> <p>The ethnicities of the children and young people who may be affected by the proposal generally relate to the demographic of Tower Hamlets. Bangladeshi children are by far the most affected group, with approximately 68% of users from this ethnicity. Black African and White British are the next two affected groups, at 12% and 11% respectively.</p> <p>However, we do not expect the draft policy to have a disproportionate impact on race, as the primary eligibility criteria for travel assistance is based on need and ability to travel, not ethnicity. Indeed, all races should benefit from the proposed changes, by empowering service users and promoting independence, as well as offering a broader range of travel assistance with greater flexibility, such as personal travel budgets and travelcards. The aim is to ensure that the proposal will have an overall beneficial impact on life chances and enabling access to opportunities and strengthening community cohesion, regardless of race.</p>
Sexual orientation			X	<p>We do not have any data on sexual orientation for service users or their parents/carers but do not expect the policy to have any adverse impact in relation to this protected characteristic.</p> <p>Systems for collecting data on protected characteristics will need to be reviewed and this is addressed in the associated action plan.</p>
Pregnancy and maternity			X	<p>We do not have any data on pregnancy or maternity for service users or their parents/carers. However, a parent /carer who is pregnant could find that the new proposal means they are required to accompany their child who is eligible for travel assistance. To avoid any potential adverse impact in this circumstance, the offer of a PTB can be used to provide flexibility around other family</p>



				<p>commitments. These include paying another person (other than the parent/carer) to travel with a child, purchasing travel pass(es) for another adult to accompany a child on bus or DLR and paying for childcare for another child whilst a parent collects their child with SEND, or vice versa.</p> <p>Systems for collecting data on protected characteristics will need to be reviewed and this is addressed in the associated action plan.</p>
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Other

Socio-economic			X	<p>We do not have any data available on the socio-economic position for service users or parents/carers and families.</p> <p>However, data for the borough shows that Tower Hamlets has high levels of deprivation. It is the 50th most deprived local authority area overall (of 317) on the rank of score measure. 31% of children in Tower Hamlets live in families below the poverty line compared to 17% nationally.</p> <p>The proposals will change the way travel assistance is provided for some families. In terms of financial implications for families with a lower income the option of a PTB provides flexibility on how it can be used. The council will use information such as the cost of local taxi firms and travel assistance needs to make an appropriate payment so that travel can be arranged by the parent/carer to avoid the potential for any adverse impacts.</p>
Parents/Carers		X		<p>As parents/carers may be impacted socio-economically, the information above is also pertinent to this section.</p> <p>Parents/carers could find that the new proposals mean they are required to accompany their child who is eligible for travel assistance. There is an increased likelihood that the parents/carers of a service users who are under 5 years old may have caring responsibilities for other young children. This could mean that they need to assist more than one child to go to and from childcare or nursery. The new policy may mean that a parent/carer is required to accompany their child who is eligible for travel assistance.</p>

				<p>To avoid any potential adverse impact in these circumstances the ways in which a PTB can be used provides flexibility around other family or work commitments. These include paying another person (other than the parent/carer) to travel with a child, purchasing travel pass(es) for another adult to accompany a child on bus or DLR and paying for childcare for another child whilst a parent collects their child with SEND.</p> <p>What will need to be monitored is whether the PTB would cover the cost of childcare, if required, especially in families with multiple children. If childcare is required for three children whilst the parent/carer accompanies the child with SEND to school, the PTB may not cover the cost. Parents/carers in these situations may have to find a person to accompany the child with SEND instead. This may, in turn, create part-time job opportunities and serve to fill any empty places existing childminders and nannies in the borough may have.</p> <p>Parents/carers will need to have confidence that the adult chosen to take their child to and from school is appropriately trained and competent to deal with children with additional needs. An Ofsted registration would be a preferred route for these adults as it would allow closer monitoring and increased regulation.</p> <p>As previously stated, the policy should not only empower and promote the independence of children with SEND, it could empower and promote the independence of the adults who accompany them, if said adults are not used to travelling independently either. This could lead to increased awareness of their community, thereby promoting social cohesion, and could raise aspirations: a mother who starts using public transport with her child/ren, for example, may then feel able to take their child/ren around the borough, visit new attractions, or even look into the world of work.</p>
<p>People with different Gender Identities e.g. Gender fluid, Non-Binary etc</p>			X	<p>We do not have any data on gender identities for service users or their parents/carers but do not expect the policy to have any adverse impact.</p>
<p>AOB</p>				



Section 5 – Impact Analysis and Action Plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Ensure the processes for collecting information about protected characteristics in relation to this service are more robust	Cleanse existing data	Ongoing - to be completed by time policy is launched	Evelyn Williams	
Ensure there is clear communication with and involvement of users, parents, carers and young people, when launching the policy	Formal consultation will ensure children, parents, carers, adults and stakeholder will have their input considered prior to policy being launched.	Consultation aimed to be launched November 2020.	Anthony Harris/David Harding	
Publish information about new personalised assessments – how to apply, how children are assessed and reviewed and how to appeal	Consider the revised draft DfE Guidance for Home to School Transport		Evelyn Williams	
Information, guidance and support for parents/carers accessing PTB's for the first time, or who require support in how best to use the PTB in relation to use credited providers of services.	FTC (secondment) in place to focus solely on PTB's and DPS implementation will be the lead for all direct liaison with parents.	Ongoing till max August 2021	Nahid Uddin	
The annual reviews of the eligibility of children and young	Process already in place through the Travel Assistance Team. Formal reassessments			



<p>people for travel assistance should be carried out as soon as possible. Use should be made of new technologies, such as video meetings, to achieve completing all annual reviews as soon as possible.</p> <p>Independent travel training should continue to be offered and, if possible, capacity increased.</p> <p>Personal travel budgets (PTBs) should be actively promoted as an option for travel assistance. Families with children under five or over 16 should be among the first phase of families that PTBs are promoted with.</p>	<p>will be completed for all existing SEND home to school service users prior to the new financial year 21/22</p> <p>Use of video meetings is an avenue being explored by ITT for next September 2020 academic year.</p> <p>A campaign should be planned with stakeholders (parents, young people and schools) to promote travelling as independently as possible.</p> <p>The Children’s Travel Team (CTT) should work with stakeholders, such as the SEND Parent Ambassadors, to develop more materials about PTBs for families, including case examples of families who have taken up PTBs.</p> <p>A plan to promote PTBs and achieve significant uptake should be developed and signed-off.</p> <p>The number of PTBs taken up should be monitored and reported to the Transport Board.</p> <p>Sufficient capacity should be enabled in the CTT so families can discuss their personal PTB with the council.</p>	<p>FTC in place for individual to focus solely on PTB and the migration of route to the Tower Hamlets DPS for external vehicles</p> <p>Transport Demand Board scoping the</p>	<p>Evelyn Williams</p> <p>Holly Barker</p> <p>Holly Barker</p> <p>Nahid Uddin</p> <p>Nahid Uddin</p> <p>Anthony Harris</p> <p>Nahid Uddin</p>	
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Improved 'join up' of the council services that provide travel assistance and support	Identify ways to improve communication and coordination between teams	benefits of a centralised travel assistance function for Tower Hamlets.	Karlijn Tummers	
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Section 6 – Monitoring

Have monitoring processes been put in place to check the delivery of the above action plan and impact on equality groups?

Yes? X




No?

Describe how this will be undertaken:

This will now sit within the Transport Demand Board and monitored on a bi-monthly basis.

Appendix A

Equality Impact Assessment Decision Rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 
<p>As a result of performing the EIA, the proposal does not appear to have any disproportionate impact on people who share a protected characteristic and no further actions are recommended at this stage.</p>	<p>Proceed with implementation</p>	<p>Green:</p> 