

Addressing Inequalities

**Draft Equalities Impact Assessment for the English
National Concessionary Travel Scheme
(as a result of a change to legislation)**

Surrey County Council Bus Review Equality Impact Assessment

Stage one – initial screening

What is being assessed?	Possible impacts in changing the method of administering the English National Concessionary Travel Scheme (ENCTS)
Service	Travel & Transport
Name of assessor/s	Jackie McIntyre (Concessionary Fares Officer) with input from Keith McKain (Project Officer) Liz Daughters (Equality & Diversity Manager)
Head of service	Iain Reeve
Date	March 2011
Is this a new or existing function or policy?	This is a new responsibility for the County Council as a result of changes to legislation making upper tier authorities responsible for the administration of the English National Concessionary Travel Scheme (ENCTS) taking over from District and Borough Councils

Write a brief description of your service, policy or function. If this screening is part of a project it is important to focus on the service or policy the project aims to review or improve.

By taking over the concessionary fares scheme from boroughs and districts it is the ideal opportunity to review and scope the county's ability to meet the residents needs for the application process.

Indicate for each equality strand whether there may be a positive impact, negative impact, or no impact.

Equality Strand	Positive	Negative	No impact	Reason
Age		X	X	There may be an issue regarding access to sites to apply/renew passes. This will most likely affect older and/or disabled people with mobility issues. There may also be an issue changing the start time from 09.00 to 09.30 in areas of the county that have a

				limited bus service.
Race		X	X	There may be an issue in publicising the change in policy and access to passes if English is a second language
Disability		X	X	There may be an issue regarding access to sites to apply/renew passes but no change to the level of concession across the County
Gender		X	X	Due to the change in the application process there may be an issue for transgender people around privacy. There may also be an issue around age of eligibility
Belief / Faith			X	Any change to the ENCTS will have no equalities impact on this group
Sexual Orientation			X	Any change to the ENCTS will have no equalities impact on this group
Other equality issues – please state		X	X	Rural communities and carers may have difficulty in accessing sites to apply for passes with a change in application process
HR issues				N/A

If you find a negative impact on any equality group you will need to complete stage one and move on to stage two and carry out a full EIA.

A full EIA will also need to be carried out if this is a high profile or major policy that will either effect many people or have a severe effect on some people.

Is a full EIA required?	Yes ✓	No
If no briefly summarise reasons why you have reached this conclusion, the evidence for this and the nature of any stakeholder verification of your conclusion.		
Briefly describe any positive impacts identified that have resulted in improved access or services		

For screenings only:

Review date	
--------------------	--

Person responsible for review	
Head of Service signed off	
Date completed	

- Signed off electronic version to be kept in your team for review
- Electronic copy to be forwarded to Equality and Diversity Manager for publishing

Stage 2 – Full Equality Impact Assessment

Introduction and background

Using the information from your screening please describe your service or function. This should include:

- **The aims and scope**
- **The main beneficiaries or users**
- **The main equality, accessibility, social exclusion issues and barriers, and the equality strands they relate to (not all assessments will encounter issues relating to every strand)**

If this EIA is part of a project it is important to focus on the service or policy the project aims to review.

The Concessionary Bus Travel Act 2007 enabled the introduction of the English National Concessionary Travel Scheme (ENCTS) from April 2008. This provided free off peak travel in England for the people aged over 60 and disabled people. Administration was vested at unitary and borough level, each becoming a Travel Concession Authority (TCA).

Further legislation has now reduced the number of TCAs from 296 to 65. Surrey County Council will take over responsibility of the ENCTS from the districts and boroughs as the TCA from 1 April 2011.

There has also been a change to the age of eligibility for the over 60s pass. This will bring the age of eligibility in line with the state pension age by 2020. The coalition government is considering whether to speed up this process. Along with this there was a tightening of the criteria for disabled applications. As a result there could be a very small percentage of disabled pass holders who would not be eligible when they come to renew their pass. This is most likely to be isolated to people who had previously obtained a pass because of being denied a driving licence on the grounds of drug or alcohol misuse.

As of February 2010 there were 176,584 pass holders in Surrey. This is made up of 7,641 disabled pass holders, 2,684 companion pass holders and 166,259 over 60 pass holders. In Surrey this represents around 65% of people over 60 being pass holders. Where a person is eligible for a companion pass they are no longer issued with a separate pass. Instead there

is a C+ symbol on their card signifying that they and their companion can travel for free within Surrey only.

Times of travel will only change from 1 April 2011:

- People holding or becoming eligible for an over 60 (changing to over 65 with time) pass will change to 09.30 to 23.00 (currently travel commences from 09.00 except in Surrey Heath where free travel starts at 09.30 through to 23.00). The national scheme starts at 09.30.
- People holding or eligible for a disabled person's pass, and companion where applicable, will continue to have free travel at any time.

The change to a later time and the method of applying for a new or replacement passes may have an effect on the equalities groups identified in the screening section of this EIA.

Taking over the administration of the scheme will be new to Surrey County Council and there will obviously be a cost involved in running the ENCTS. However, DfT is expecting a reduction in administration costs from all TCAs as a result of the change in responsibility. The DfT predicted cost for running a large scheme, such as Surrey's, is between £200,000-£250,000. Current administration costs reported by the Districts and Boroughs is around £400,000. Therefore Surrey County Council is under pressure to deliver the scheme at a reduced cost to DfT with little disruption to pass holders and new applicants. The continuation of the Scheme is dependent on ongoing funding from DfT.

Now describe how this fits into 'the bigger picture' including other council or local plans and priorities.

Whilst the scheme is not a Surrey County Council scheme it does have a bearing on services and strategies that are run by the County Council.

The use of concessionary passes is high in Surrey with 6.9 million of the 28.2 million journeys made last year using concessionary passes. Uptake is also high with nearly 65% of all people over 60 having a pass.

To sustain this level of demand and usage Surrey must therefore have a well managed, well designed and sustainable bus network. The Bus Review is achieving this with a very favourable outcome in Phase 1. Phase 2 and 3 will potentially be more difficult to achieve due to the impact of more rural routes in these phases.

This feeds into the Bus Strategy that will be part of the Local Transport Plan (LTP3).

As the proposed method of application will be through the usage of a number of libraries across the county it will also have an impact on the future policy for libraries.

Evidence gathering and fact-finding

What evidence is available to support your views above? Please

include:

- **A summary of the available evidence**
- **Identification of where there are gaps in the evidence (this may identify a need for more evidence in the action plan)**
- **Information on contributing factors to inequality.**
- **What information is currently captured with respect to usage and take up of services.**
- **What the current situation is in relation to equality and diversity monitoring (where relevant)**

Sources of evidence may include:

- Service monitoring reports including equality monitoring data
- User feedback
- Population data – census, state of the county, Mosaic
- Complaints data
- Published research, local or national.
- Feedback from consultations and focus groups
- Feedback from individuals or organisations representing the interests of key target groups
- Evidence from partner organisations, other council departments, district or borough councils and other local authorities

How have stakeholders been involved in this assessment? Who are they, and what is their view?

Surrey Coalition of Disabled People

Surrey County Council has worked closely with the Surrey Coalition on this issue. They have made a positive contribution to the content of the guidance notes for disabled people as well as raising awareness of issues that people with an impairment or disability may face in trying to access the scheme. The Coalition offered to test out the on-line application and renewal process. It was suggested that renewals from disabled pass holders could be completed by post as long as proof of eligibility was enclosed. This would be posted back to them once processed. They have also offered to do some 'mystery shopping' when the Surrey scheme goes live to test the processes we have put in place. This will provide valuable feedback on how the administration process is working and identify any training or procedural issues that need to be addressed.

Empowerment Boards

Also raised concerns about the application process as to what documentation will be required to be seen, and ensuring that applications and guidance notes are available in suitable formats. Many people indicated they would welcome the opportunity to apply on-line. Accessibility to libraries for people with a disability, very old and frail people, carers and those who feel unable to travel to their library due to the journey involved was a major concern.

Recommendations included offering access to on-line system via Mobile Libraries (this option would depend on the outcome of the Libraries PVR), from social care teams and application by proxy.

There was also concern about the capability of the libraries to cope with the number of applications; the need to provide a private area for anyone wishing to discuss their application with the library staff and assurance that all staff are trained in disability awareness.

Many were also concerned that applicants should not be subjected to undue pressure to complete the process within a set time.

Analysis and assessment

Given the available information, what is the actual or likely impact on minority, disadvantaged, vulnerable and socially excluded groups? Is this impact positive or negative or a mixture of both?

(Refer to page 17 of the EIA guidance for full list of issues to consider when making your analysis)

What can be done to reduce the effects of any negative impacts? Where negative impact cannot be completely diminished, can this be justified, and is it lawful?

Possible impacts on Older People

The start time of 09.30 may affect older people in rural areas as the next bus after 09.30 may be too late in the day to be of practical use e.g. to get to hospital/medical appointments.

People with mobility impairments may find it more difficult to apply for their pass by travelling to a library, compared with to the previous system which allowed postal applications. There will be more access points than currently available from the districts and boroughs.

Mitigation for Older People

In instances where a person's mobility would impinge on their being able to get to a library to apply it is also likely that they would have difficulty using the main bus network for the same reason. In these instances they could be entitled to a 'companion pass.' This would entitle the pass holder to have any person they wished accompany them on their journeys, for free within Surrey, so that they can assist them.

Having a companion pass does not mean that the pass holder must always travel with a companion, however. They can travel independently if they are able and have assistance when they feel it would be necessary.

People have the option of using community transport to get to one of the designated libraries involved in the ENCTS application process. However, this would be at their own expense.

There will be arrangements in place for people to apply by proxy for someone who might have great difficulty in getting to a library to apply in person. Proof of identity, age, residency and impairment (for someone applying on behalf of a disabled person) would still be required to be seen by library staff. The initial application could be completed at home or with assistance from a family member, carer etc on-line. Applications by proxy would require a person to provide a passport size photograph at their own expense.

Possible impacts on people with English as a second language

They may have difficulty with the application process. However, this would be through not being able to understand and interpret the new method of application and they would have met similar problems with the previous application process.

Mitigation for people with English as a second language

Surrey County Council will need to publicise the change in responsibility and the application process prior to the change over 1 April 2011. Surrey County Council has a process in place for creating information in other languages upon request. This process will also apply for the change to the ENCTS.

By making the process free from form filling the process should be easier for people without good English. This is because they will be receiving assistance from the library staff in making their application. They can be talked through the process, what information is required and have the information input for them.

Possible impacts on disabled people

As it currently stands applications for people with physical, sensory, learning or mental disability could be completed by themselves, or by a carer or other professional worker on their behalf.

Some disabled people may have difficulty in getting to a library to apply in person.

Also, once at the library there may be difficulties in communicating with people with certain types of disability. Examples would be

- communicating with someone who is hearing impaired. They would need someone who could sign or have all the information in writing
- communicating with someone who has a learning or mental disability and requires a greater amount of time to be talked and helped through the process

There is a requirement to ensure a person's privacy is protected in a public library.

Mitigation for disabled people

If a disabled person has difficulty in attending a library they can also apply for a companion pass. Disabled people will not be asked to disclose nature of disability at the library; but paper evidence will be forwarded to County Hall for assessment. All library staff have received disability awareness training and hearing loops will be available at the libraries involved in the ENCTS application process.

Hearing loops will be available at Addlestone, Banstead, Camberley, Caterham Hill, Caterham Valley, Cranleigh, Dorking, Egham, Epsom, Esher, Ewell, Farnham, Godalming, Guildford, Haslemere, Horley, Leatherhead, Oxted, Redhill, Staines, Sunbury, Walton and Woking Libraries.

As stated previously, having a companion pass does not mean that the pass holder must always travel with a companion. They can travel independently if they are able and have assistance when they feel it would be necessary. Disabled people under 25 with learning difficulties, and in further education, can access independent travel training.

People have the option of using community transport to get to one of the designated libraries. However, this would be at their own expense.

There will be arrangements in place for people to apply by proxy for someone who might have great difficulty in getting to a library to apply in person. Proof of identity, age, residency and impairment (for someone applying on behalf of a disabled person) would still be required to be seen by library staff. The initial application could be completed at home or with assistance from a family member, carer etc on-line. Applications by proxy would require a person to provide a passport size photograph at their own expense.

The option of renewing a bus pass will be available online via the Surrey County Council website. Any pass holder will be able to use this service and would mean that people would not need to attend in person to renew their pass. A pass holder will be able to check and confirm their details such as address and their photograph. However, if any details require updating they would need to provide proof of change. For example, if a person had changed address they would need to provide proof of where they now lived and that it is still in Surrey.

This online service would not apply to people with a temporary disability. This is because they are required to provide new proof that their disability persists and therefore that they are still eligible for a pass.

We will record whether disabilities are temporary or permanent. This will mean that people with a permanent disability could be issued with a pass lasting 5 years. At present passes are issued for a period up to 3 years. They would also not be required to re-provide proof of their disability when the pass is due for renewal.

People with a temporary disability would be required to provide new proof of eligibility and their passes would be for 1-3 years as currently practised.

Possible impact on Transgender people

Transgender applicants may be unwilling to apply for a pass in person at a library. They may feel that this process is forcing them to expose the fact that they are a transgender person.

As seen from the recent legal case, brought against the Department for Work and Pensions, there also may be an issue around the age of eligibility for transgender people. This is because the age of eligibility for women is being brought in line with the state pension age, 65, over the next 10 years. Therefore someone who has undergone gender reassignment to become a woman may make them eligible for a pass sooner.

Mitigation for Transgender people

Unfortunately there may be little that the County Council can do in this regard. This is because we are obliged, under legislation, to record details that the Audit Commission requires us to. We are not required to record the person's gender but must record their name (with legal proof such as passport, drivers license etc) and National Insurance Number (newly required by the Audit Commission as extra protection against fraud). These details would need to be legally changed by the applicant before they could apply for a card under whichever gender they are undergoing reassignment to. As well as these details an up to date digital photograph is required. These requirements would still apply if the application was made by post or submitted directly on-line by the applicant.

With the issue of eligible age, this is not seen as a particular problem. This is because as long as the person applying for the pass has legal documentation stating their new name (including their National Insurance card) and proof of age and address with their new name the eligibility criteria will be the same for them as it would for any other applicant.

Possible impact on carers

A carer may feel that they cannot leave the person in their care for the time it would take to get to and from the closest designated library in order to apply for the bus pass.

Mitigation for carers

Part of the application process could be completed on-line. This would save time at the library but library staff need to verify proof of identity, residency etc.

The opportunity to apply by proxy will be available to people who might have great difficulty in getting to a library to apply in person. Proof of identity, age, residency and impairment (for someone applying on behalf of a disabled person) would be required to be seen by library staff. The initial application could be completed at home or with the assistance from a family member, carer etc on-line. Applications by proxy would require a person to provide a passport size photograph at their own expense.

Possible impact on people in rural communities

As with many other groups the issue for people in rural or isolated communities would be access to the application process.

Mitigation for people in rural and isolated communities

This would only be a problem for new applicants and people with temporary disabilities who need to attend in person to apply for a pass. However, there is community transport available. Also, there will be 23 libraries where people can apply. People are not required to go to a library in the District or Borough where they live.

The opportunity to apply by proxy will be available to people who might have great difficulty in getting to get to a library to apply in person. Proof of identity, age, residency and impairment (for someone applying on behalf of a disabled person) would still be required to be seen by library staff. The initial application could be completed at home or with the assistance from a family member, carer etc on-line. Application by proxy would require a person to provide a passport size photograph at their own expense.

General form of mitigation & benefit

In terms of advertising the change in responsibility and the application process this will not be done solely by Surrey County Council. The Districts and

Boroughs will be able to signpost people to which libraries they can apply. They will also be able to advise on the eligibility criteria and information that the applicants should take with them. There will be a larger number of venues from which people can access information about the scheme.

The fact that applications will be made in person will help people because they can be talked through the application whilst they are there. This is unlike a system of paper application where if a person had a question they would need to contact a call centre or help desk to get advice.

Also due to the process being paperless it means that applicants do not have to spend money on getting passport photographs and paying for postage back to the council.

Where there are positive impacts, what changes have been or will be made, who are the beneficiaries and how have they benefited?

For new applicants there is a much wider choice of venues to visit than at present and there is no restriction on choice of venue.

For applicants requiring renewal of their pass they are able to renew on-line.

Passes for persons with a permanent disability will be issued for five years and will automatically be renewed thereafter. For this to be in place from 1 April it would depend on the quality of the data received from the District and Boroughs. We would need to have the nature of the disability recorded or have it recorded that the person's disability was due for review. If this information was not recorded the ongoing automatic renewals would start after the first application under the SCC process for new applicants or after the first renewal for existing pass holders.

Persons over 60 years with passes due for renewal will be contacted by post for confirmation that renewal is required and, if there are no changes required, the pass will be processed automatically thus removing the need to apply in person.

Recommendations

Please summarise the main recommendations arising from the assessment. If it is impossible to diminish negative impacts to an acceptable or even lawful level the recommendation should be that the proposal or the relevant part of it should not proceed.

To provide sufficient library venues throughout the County for people over 60 years and disabled people to apply for a concessionary travel pass.

To enable renewals of travel passes for people over 60 years to be processed automatically following agreement by pass holder.

To provide assistance to disabled people either at the library by staff fully trained in disability awareness training or by third party worker who can assist with the application process (by proxy).

To ensure adequate level of privacy is available within a public library for all people involved in the application process.

To provide assistance to carers, people with mobility issues and people living in isolated communities so they can apply by proxy if necessary.

Action Plan – actions needed to implement the EIA recommendations

Issue	Action	Expected outcome	Who	Deadline for action
Application process	Adequate provision of convenient library outlets for new applicants	Application completed successfully with/without assistance	Trained Library staff/ Call centre staff/on-line guidance notes	1 April 2011
Pass holder renewals	On-line application process	Seamless and quick renewal process	By pass holder but help available from call centre and on-line help notes	1 April 2011
Persons with language difficulties or persons requiring to use sign language	To ensure client can understand and communicate with staff or that they can	Application completed with trained library staff assistance/interpreter	Advice via call centre and assistance from library staff	1 April 2011

	apply by another method			
Applications from persons with hearing/sight impairment	To complete application process with appropriate assistance or that they can apply by another method	Application completed with assistance at the library	Trained library staff	1 April 2011
Applications from carers or persons in isolated/rural areas	To complete application process with appropriate assistance or that they can apply by another method	Application completed with assistance or by proxy	Social Care Team/ trained library staff	1 April 2011

- Actions should have SMART Targets
- Actions should be reported to the Directorate Equality Group (DEG) and incorporated into the Equality and Diversity Action Plan, Service Plans and/or personal objectives of key staff.

Review date	
Person responsible for review	
Head of Service signed off	
Date completed	
Date forwarded to EIA coordinator for publishing	

- **Signed off electronic version to be kept in your team for review**
- **Electronic copy to be forwarded to your service EIA coordinator**