

Equality Analysis Evidence Document					
Title: What are you completing an Equality Analysis on?					
Withdrawal of Early Morning Travel Concession					
Why are you completing the Equality Analysis? (please tick any that apply)					
Proposed New Policy or Service	Change to Policy or Service	MTFS (Medium Term Financial Strategy)		Service Review	
	✓	✓			
Version Control					
Version control number	1.0	Date	06/10/14	Reason for review (if appropriate)	N/A
Risk Rating Score (use Equalities Risk Matrix and guidance)				Inherent risk score on proposal	6
**If the Risk Score is 1 or 2, an Impact Assessment does NOT have to be completed. Please check with equalities@wiltshire.gov.uk for advice				Residual risk score after mitigating actions have been identified	
Section 1 – Description of what is being analysed					
<p>The aim of the policy is to protect the council's ability to meet the statutory requirement of providing a bus pass to older and disabled people for free travel at off-peak times in the face of great demand on finite resources. It is proposed to end free travel using the Wiltshire Bus Pass before either 0900 or 0930 on weekdays. Free travel will continue to be available all day at weekends as it is a statutory requirement.</p> <p>As no changes are proposed to actual bus services, it will still be possible to make journeys in the early morning but, instead of being free to bus pass holders, adult fare will be payable.</p> <p>Exceptions are being considered:</p> <p>(i) For all disabled bus pass users, who make up 6% of all concessionary bus pass users.</p> <p>(ii) For certain services where the bus service would otherwise provide unacceptably limited journey opportunities after free travel starts</p>					
Section 2A – People or communities that are currently targeted or could be affected by any change (please take note of the Protected Characteristics listed in the action table).					
<p>This change will only affect the older and disabled groups and they will retain the hours of availability guaranteed to all users nationally. If implemented the situation in Wiltshire will be similar to that in adjoining counties and generally in many counties of England.</p> <p>The groups of people who could be eligible for a bus pass are set out in legislation. Only older and disabled groups are mandatory and Wiltshire Council follows national guidelines in assessment of eligibility. The most affected people will be distinguished not by community or</p>					

group but by purpose of journey. People who are travelling to work or to medical appointments are likely to have less flexibility to make the journey later. Some rural communities with very infrequent bus services also have restricted choice and there is an option to make exceptions of some bus services which would ameliorate this to some extent.

Section 2B – People who are **delivering** the policy or service that are targeted or could be affected (i.e. staff, commissioned organisations, contractors)

N/A

Section 3 –The underpinning **evidence and data** used for the analysis (Attach documents where appropriate)

Prompts:

- What data do you collect about your customers/staff?
- What local, regional and national research is there that you could use?
- How do your Governance documents (Terms of Reference, operating procedures) reflect the need to consider the Public Sector Equality Duty?
- What are the issues that you or your partners or stakeholders already know about?
- What engagement, involvement and consultation work have you done? How was this carried out, with whom? Whose voices are missing? What does this tell you about potential take-up and satisfaction with existing services?
- Are there any gaps in your knowledge? If so, do you need to identify how you will collect data to fill the gap (feed this into the action table if necessary)

Local statistical data:

There are 87,000 bus pass users in Wiltshire. The number varies from day to day as passes are issued and returned.

Wiltshire’s 2014 population is estimated at 470,000 so 19% have bus passes.

Wiltshire’s 2014 retirement age population is estimated at 108,000 and 82,000 bus passes were issued due to age, so 76% of retirement age people have bus passes.

It is estimated that 12% of all concessionary bus pass journeys are made before 0930 and 6-7% are made before 0900.

9,794,388 bus passenger journeys were made in Wiltshire in 2013-2014 with and without passes.

4,473,885 concessionary bus pass journeys were made in Wiltshire in 2013-2014 So bus pass journeys accounted for about 45% of bus travel in Wiltshire in 2013-2014.

Around 5,000 people have bus passes because of their disability, 6% of all passes issued.

In 2011 census data 75,000 people in Wiltshire were limited in daily activities – 6.7% (5,000) “a lot” and 9.3% (7,000) “a little”

In western Wiltshire, the majority of bus journeys are operated by First group buses. Because of First’s concern about heavy loadings on their buses in the early morning, an exception has been made in the current scheme so that passes cannot be used on their west Wiltshire buses before 0900. This exception has been in place since the introduction of free travel in 2006. We rarely get customer feedback about this, but when we do, the main concern is that it is confusing for passengers who are used to all day travel elsewhere in Wiltshire or with other operators. The question of equality or discrimination has occasionally been mentioned in letters or phone calls, but has never been pursued once the situation has been fully explained.

Consultation data:

The analysis of the public consultation is appended.

National data:

The report “Measuring the cost of pre 0930 concessionary travel in Wiltshire” concluded that 12% of all concessionary journeys took place before 0930 on weekdays and 7% before 0900 on weekdays.

Studies outside Wiltshire (Lancashire and Nottingham) have shown that use made of the statutory concessionary pass varies enormously but also that, as a group, disabled pass holders make more than double the number of concessionary journeys compared with older people.

***Section 4 – Conclusions** drawn about the impact of the proposed change or new service/policy

Prompts:

- What actions do you plan to take as a result of this equality analysis? Please state them and also feed these into the action table
- Be clear and specific about the impacts for each Protected Characteristic group (where relevant)
- Can you also identify positive actions which promote equality of opportunity and foster good relations between groups of people as well as adverse impacts?
- What are the implications for Procurement/Commissioning arrangements that may be happening as a result of your work?
- Do you plan to include equalities aspects into any service agreements and if so, how do you plan to manage these through the life of the service?
- If you have found that the policy or service change might have an adverse impact on a particular group of people and are **not** taking action to mitigate against this, you will need to fully justify your decision and evidence it in this section

This will have an impact on older and disabled groups of people by making early morning bus travel less affordable than at present. The results of the consultation confirm that going to work, and medical appointments requiring early morning journeys are of particular concern. Free travel to hospital and medical appointments are the dominant issue for both the older and the disabled groups. For the disabled group free travel to work is another big concern, and in the younger age groups free travel to education. In the older group shopping is an important use of their free travel, but it is reasonable to assume there is more flexibility to adjust travel times for shopping. Even after adjusting travel times, their position will become no worse than in many other English counties, including all the ones surrounding Wiltshire, where free early morning travel is not available.

The matter of whether people are eligible for a free bus pass will not be changed. Whichever option for start time is chosen, the Wiltshire scheme also includes other discretionary provisions not affected by these proposals, namely the provision of +companion passes for disabled users who cannot use a bus unaided, so it will continue to offer more than the national standard. Although people will find their options for free bus travel limited in the early morning, options are proposed to ameliorate this for groups who are expected to be most disadvantaged through exempting services in sparsely served areas or exempting disabled pass holders altogether. Many other counties in England have changed their schemes to exclude early morning travel or never offered it in the first place, so the proposal will not put Wiltshire out of line with general expectations for a concessionary travel scheme in England.

Certain rural communities have a very infrequent bus service where there are only a handful of journeys to the local town throughout the day. In this sort of situation, a bus pass user might not be able to defer the free journey until later in the morning because the bus service is too infrequent to offer a suitable journey time. In the consultation, this came out strongly as a theme of the comments that were made, although analysis of the results by community area was inconclusive. There is an option to make exceptions for bus services serving such communities so that free travel is available at an earlier time. Examples of counties with exceptions from their normal start time allowing pre 0900/0930 travel to be free on certain services are:

- Dorset: 81 services are exempt because there is no suitable bus for 60 minutes after 0930.
- Gloucestershire: 60 services are exempt because there is no suitable bus for 60 minutes after 0930
- Worcestershire: 23 services are exempt because there is no suitable bus for 90 minutes after 0930
- Devon: 60 services are exempt because there is no suitable bus for 90 minutes after 0930.

There is an option to allow free early morning travel to continue for disabled people. That would be a more favourable treatment of that group that goes beyond the national requirement for bus pass schemes, but is within the council's discretionary powers.

***Section 5 – How will the outcomes from this equality analysis be monitored, reviewed and communicated?**

Prompts:

- Do you need to design performance measures that identify the impact (outcomes) of your policy/strategy/change of service on different protected characteristic groups?
- What stakeholder groups and arrangements for monitoring do you have in place? Is equality a standing agenda item at meetings?
- Who will be the lead officer responsible for ensuring actions that have been identified are monitored and reviewed?
- How will you publish and communicate the outcomes from this equality analysis?
- How will you integrate the outcomes from this equality analysis in any relevant Strategies/Policies?

It will be necessary to contact existing bus pass users prior to the introduction of any change to explain how the changes might affect them. This will combat any rumours or misreporting about the changes. A standard fact sheet would suffice for all users explaining how their options for travel at different times are affected. However, if all day free travel is retained for disabled users, an alternative communication can be sent to reassure them. Changes would also be made to the documentation for new users sent out with the bus pass.

Bus operators are notified of the working of the scheme each year prior to the 1 April and changes would be drawn to their attention at that time. Bus operators have well developed internal procedures to notify all bus drivers of relevant information and officers in the Passenger Transport Unit would actively pursue any reports that the scheme was being misapplied, something that they already do as part of the day to day management of the scheme.

The conditions and cost of the concessionary bus pass scheme is reviewed annually in consultation with the bus operators.

The consultants advising Wiltshire Council on the management of the scheme continually monitor usage, cost and relevant technical or legislative changes. They advise the council if any areas of concern or opportunities arise. An annual report on the progress of the scheme is produced by the consultants.

***Copy and paste sections 4 & 5 into any Committee, CLT or Briefing papers as a way of summarising the equality impacts where indicated**

Completed by:	Eric Egar	
Date	6 th October 2014	
Signed off by:	Parvis Khansari	
Date	3 rd December 2014	
To be reviewed by:		
Review date:		
For Corporate Equality Use only	Compliance sign off date:	18/11/14
	Published on internet date:	

Equality Impact Issues and Action Table (for more information on protected characteristics, see page 7)					
Identified issue drawn from your conclusions (only use those characteristics that are relevant)	Actions needed – can you mitigate the impacts? If you can how will you mitigate the impacts?	Who is responsible for the actions?	When will the action be completed?	How will it be monitored?	What is the expected outcome from the action?
Age					
Older people will find their options for free bus travel limited in the early morning, which is a change from the current position in Wiltshire.	It will be necessary to contact existing bus pass users prior to the introduction of any change to explain how the changes might affect them.	Wiltshire Council bus pass team	March 2015	Changes would also be made to the documentation for new users sent out with the bus pass	Will reduce misunderstandings by users about the changes
Disability					
As a group, disabled pass holders make more than double the number of concessionary journeys compared with older people, suggesting it is more important to the daily lives of at least some members of this group.	There is an option to exclude disabled pass holders from the proposed changes.	Incorporated into concessionary travel scheme 2015-2016	Concessionary Travel Scheme 2015-2016 comes into effect 1 April 2015.	Annual report and review of the scheme. Day to day action if misapplication of the scheme is reported.	Will allow disabled pass holder to continue to travel free all day on weekdays. Reduction in savings achievable by 10-12%.
Gender Reassignment					
Marriage and Civil Partnership					
Pregnancy and Maternity					

Race (including ethnicity or national origin, colour, nationality and Gypsies and Travellers)					
Religion and Belief					
Sex					
Sexual Orientation					
Other (including caring responsibilities, rurality, low income, Military Status etc)					
Certain rural communities have a very infrequent bus service where there are only a handful of journeys to the local town throughout the day. In this sort of situation, a bus pass user might not be able to defer the free journey until later in the morning because the bus service is too infrequent to offer a suitable journey time.	There is an option to make exceptions for bus services serving such communities so that free travel is available at an earlier time.	Incorporated into concessionary travel scheme 2015-2016	Concessionary Travel Scheme 2015-2016 comes into effect 1 April 2015.	Annual report and review of the scheme. Day to day action if misapplication of the scheme is reported.	Will improve opportunities for access to main town facilities. Reduction in savings achievable.

