

Equality Impact Assessment (EIA) Report Form

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to Equality and Diversity.

Please refer to the 'Equality Impact Assessment Guidance' while completing this form. If you would like further guidance, please contact the Corporate Strategy Team or your directorate Heads of Service Equality Champion.

Where do you work?
Service Area: Operations (Home to School Transport)
Directorate: Education, Leisure and Lifelong Learning

(a) This EIA is being completed for a...

Service/ Function <input type="checkbox"/>	Policy/ Procedure √	Project <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>	Proposal √
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(b) Please name and describe below...

Neath Port Talbot Home to School Travel Policy 2017.

A review of the existing policy has been undertaken, and a new proposed policy has been consulted upon. Under the new policy, those pupils who do not meet the criteria for free school transport, it is proposed that the Local Authority exercises its discretionary power as outlined in Section 6 of the Learner Travel Measure to provide free home to school travel for pupils attending both Voluntary Aided (Faith) education and Welsh medium education as outlined in the revised policy.

(c) It was initially screened for relevance to Equality and Diversity on:

13th September 2016

(d) It was found to be relevant to...

Age √	Race √
Disability √	Religion or belief √
Gender reassignment <input type="checkbox"/>	Sex √
Marriage & civil partnership <input type="checkbox"/>	Sexual orientation <input type="checkbox"/>
Pregnancy and maternity <input type="checkbox"/>	Welsh language √

(e) Lead Officer

Name: Paul Walker

Job title: Operations Coordinator

Date: February 2017

(f) Approved by Head of Service

Name: Chris Millis

Date: February 2017

Section 1 – Aims (See guidance):

What are the aims?

A proposal to introduce a new Home to School Travel Policy which continues to provide free home to school transport for those pupils who are eligible under statutory requirement. For those pupils that do not meet the criteria for free home to school transport, the new policy has the Local Authority exercise its discretionary powers to provide access to free home to school transport for pupils attending both Voluntary Aided (Faith) education and Welsh medium education.

The proposed policy reflects the home to school travel duties and requirements that fall to the Council by virtue of the Education Act 1996, The Learner Travel (Wales) Measure (2008), The Learner Travel Statutory Provision and Operational Guidance 2014, The Learner Travel Information (Wales) Regulations 2009, The Safety on Learner Transport (Wales) Measure 2011 and the All Wales Travel Behaviour Code.

Who has responsibility?

Director of Education, Leisure and Lifelong Learning

Who are the stakeholders?

Pupils, parents/carers, governors, teaching and non-teaching staff

Section 2 - Information about Service Users (See guidance):

Please tick what information you know about your service users and provide details / evidence of how this information is collected.

Age	<input checked="" type="checkbox"/>	Race	<input checked="" type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	Religion or belief.....	<input checked="" type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	Sex	<input checked="" type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	Sexual orientation.....	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	Welsh language.....	<input checked="" type="checkbox"/>

What information do you know about your service users and how is this information collected?

Data relating to pupils currently in receipt of home to school transport as of September 2016 collected by the local authority (note these figures can change on a daily basis) show that:

947 Primary age pupils are currently in receipt of home to school transport of which:

54.9% (520) are male

45.1% (427) are female

39.9% (378) attend Welsh Medium Schools

8.65% (82) attend Faith (Denominational) Schools

24.9% (236) attend Special schools

2663 of Secondary age pupils are currently in receipt of home to school transport of which:

53.7% (1430) are male

46.3% (1233) are female

31.65% (843) attend Welsh Medium Schools

4.2% (112) attend Faith (Denominational) Schools

11.9% (317) attend Special Schools

Any Actions Required?

Currently the local authority is not able to identify how many of its service users access the Home to School Travel provision disaggregated by all protected characteristics under the Equality Act 2010, for example Race. Monitoring information may need to be extended, to capture any gaps in the data as appropriate.

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics. This could be based on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

	Positive	Negative	Neutral	Needs further investigation
Age	➔ ✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	➔ ✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	➔ <input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
Marriage & civil partnership	➔ <input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
Pregnancy and maternity	➔ <input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
Race	➔ ✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Religion or belief	➔ ✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sex	➔ <input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
Sexual orientation	➔ <input type="checkbox"/>	<input type="checkbox"/>	✓	<input type="checkbox"/>
Welsh language	➔ ✓	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case including details of any consultation (and/or other information) which has been undertaken to support your view

See pages 7 - 14

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support your view?

Following Cabinet approval on 1st December 2016 a six-week public consultation exercise was launched on 5th December 2016 and closed on 16th January 2017. Stakeholders were able to respond in a number of different ways:

- NPTCBC Portal 769 responses received (equality monitoring data collected)
- 6 consultation meetings with pupils
 - 11 pupils from Year 5 & 6 (St Joseph's Primary Neath)
 - 9 pupils from Year 4, 5 & 6 (Cwmafan Primary)
 - 10 pupils Year 9 & 10 (The Community Committee Llangatwg Comprehensive)
 - 45 pupils from Year 7-13 (St Joseph's Comprehensive and 6th Form)
 - Pupils from Year 7-12 Ysgol Ystalyfera
 - Pupils from Rhosafan Primary

At each consultation meeting, pupils were provided with a detailed description of the proposed Home to School Travel Policy and provided with an explanation of the consultation process. Also words such as discretionary, equality, religious preference and fairness were discussed and defined.

- Meeting with Stakeholders on the 15th & 16th December 2016, 0 stakeholders attended on the 15th and 2 stakeholders attended on the 16th.
- Direct email or in writing

Any Actions required (to mitigate adverse impact or to address identified gaps in knowledge)

Section 4 - Other Impacts:

Please consider how the initiative might address the following issues.

You could base this on service user information, data, consultation and research or professional experience (e.g. comments and complaints).

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

As a result of the findings from the consultation exercise, the revised policy is likely to have a positive impact on each of the above.

There is no evidence from the full EIA to indicate that:

- the policy may result in less favourable treatment for particular groups
- the policy may give rise to indirect discrimination

- the policy is more likely to assist or impede in making reasonable adjustments.

The proposed policy will help to:

- remove or minimise any disadvantage
- to meet the needs of different groups, and
- encourage increased participation of particular groups.

The policy also promotes the understanding of the needs of different groups.

**What work have you already done to improve any of the above?
Is the initiative likely to impact on Community Cohesion?**

All learners will be treated with equal parity in respect of the distance to school, and there is no evidence to suggest that the revised policy will have an adverse impact on any of the three parts of the Public Sector Equality Duty 2010 or an adverse impact on the need to reduce social exclusion and poverty.

The policy aims to provide fair and equal access in relation to Home to School Travel provision. The policy, if adopted may also contribute in some way to working towards the Well-Being Goals as set out in the Well-Being of Future Generations (Wales) Act 2015, for example, 'a Wales of Vibrant Culture and Thriving Welsh Language and @A prosperous Wales and a More Equal Wales.

How will the initiative treat the Welsh language in the same way as the English language?

Neath Port Talbot County Borough Council has a duty to 'promote access to education and training through the medium of Welsh' and discharges this duty by treating preference for either language equally. The local authority in its new policy has proposed to continue to provide discretionary transport so pupils would continue to receive free home to school transport if they live further than the statutory distance of 2 miles (for a primary school pupil) and 3 miles (for secondary school pupils) from a Welsh medium school.

Section 5 – Post Consultation

Please explain the impact of the consultation process on the issues stated above.

See pages 7-14

Section 6 - Monitoring arrangements:

Please explain the arrangements in place (or those which will be put in place) to monitor this function, service, policy, procedure, strategy, plan or project:

Monitoring arrangements:

The policy will need to be monitored, following implementation, to ensure that it is complying with the Public Sector Equality Duty 2011 under the Equality Act 2010 and that the content of the EIA is still relevant and accurate.

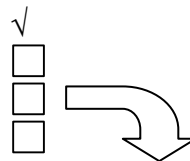
Actions:

To monitor the take up of home to school travel provision by protected characteristics
To monitor the applications for assistance with home to school travel by protected characteristics
To monitor appeals against a home to school travel decision by protected characteristics

Section 7 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to guidance for further information on this section).

- Outcome 1: Continue the initiative...
- Outcome 2: Adjust the initiative...
- Outcome 3: Justify the initiative...
- Outcome 4: Stop and remove the initiative...



EIA Consultation Evidence

1.0 Introduction

1.1 As part of its statutory duty to undertake Equality Impact Assessments Neath Port Talbot CBC have developed a 'screening' mechanism, to determine whether a 'policy' should be subject to a Full Equality Impact Assessment. Screening is a short, sharp exercise that helps to determine relevance; it is not a proxy for proper assessment. Once it is concluded that a full Equality Impact Assessment is appropriate, screening ends and the assessment begins.

1.2 The initial Equality Impact Assessment Screening was carried in September 2016 in relation to the proposals to review the current provision of Home to School Travel. The Screening exercise provided an opportunity to consider any *potential or likely* impact of policies and practices on protected groups as laid out in the Equality Act 2010 using available existing and relevant national and local data.

1.3 The Screening identified a mostly high and/or medium impact in relation to age, race, religion or belief and Welsh language. The consultation exercise and responses in the context of a full Equality Impact Assessment are analysed to identify any *actual* impact the proposed policy may have either positively or negatively on any protected characteristic as listed in the Equality Act 2010 and Neath Port Talbot County Borough Council also give consideration to the Welsh Language.

1.4 The specific duties in Wales require the local authority to meet the engagement provisions as part of assessing the impact on protected groups. This will help the organisation to understand better the actual impact of their proposals on different groups.

1.5 Neath Port Talbot CBC is required to consult and involve relevant stakeholders (those from protected groups) before making important decisions. By effectively consulting and involving stakeholders, as an integral part of their decision-making processes, the organisation will be able to make better decisions by getting a clearer picture of the main equality issues in their work, gathering evidence to use in carrying out impact assessments, and increasing transparency and openness in decision-making.

2.0 Equality Monitoring Data

Equality monitoring data was collected during the online consultation portal exercise which received a total of 769 responses.

When asked why respondents were interested in the Council's Home to School Travel Policy 2017 the majority of people who responded were those affected by the proposal

- 27% (209) responses received were from pupils who currently use school transport
- 21% (164) from pupils who are considering using school transport
- 12% (92) were from the parent of a child who was currently using school transport
- 9% (72) were from the parent of a child who was considering using school transport
- 1% (6) chose not to respond to the question
- 32% (246) responses defined themselves as 'other' – when this was further explored as part of the consultation exercise, all were deemed to be relevant stakeholders.

2.1 Age

765 of the 769 respondents identified with specific age groups. The largest percentage of responses was just over 50% (383) who were under the age of 16. The second largest age category was those aged 40 – 49 years with 14.38% (110) responses, and 12.16% (93) who identified as being between 17-24 years of age.

2.2 Disability

The majority of respondents at 88.89% (672) did not consider themselves to have a disability as defined under the Equality Act 2010, with 6.08% (46) preferring not to disclose and 5.03% (38) respondents that did consider themselves to have a disability.

2.3 Ethnic Origin

The majority of respondents identified their ethnic origin as British with a total count of 632 or 82.83%, 7.08% (54) described themselves as having a 'White Other' ethnic origin, 3.41% (26) identified as being Irish and 1.57% (12) as Asian Indian.

2.4 Gender

The majority of respondents to the consultation were female. 659 respondents identified their gender as below:

	% Total	% Answer	Count
Male	33.81	39.45	260
Female	49.54	57.81	381
Transgender	1.04	1.21	8
Prefer not to say	1.3	1.52	10
No response	14.30	-	110
	100%	100%	769

2.5 Religion/Belief

When asked to identify the respondent's religion/belief the majority defined themselves as Christian 68.69% (520). 17.83% (135) of respondents identified as having no religion and 7.66% (58) preferred not to say.

2.6 Sexual Orientation

640 (87.43%) of respondents identified as heterosexual and 73 (9.97%) preferred not to disclose their sexual orientation. 7 (0.96%) responses were received from lesbian women, 6 (0.82%) were gay and 6 (0.82%) identified as bisexual.

2.7 Nationality

The majority of respondents identified their nationality as Welsh at 76.78% (582), 8.31% (63) as British, 4.49% (34) as English and 2.64% (20) as Irish.

3.0 Impact on Age

3.1 The Equality Duty covers the protected characteristic of age, which refers to a person having a particular age or being within an age group. This includes all ages, including children and young people. Due to the nature of this proposal/review it could impact on children and young people attending compulsory education in Neath Port Talbot.

3.2 Using current data, out of approximately 20751 primary and secondary school pupils the Local Authority provides Home to School Transport for approximately 3610 children and young people.

3.3 The proposed policy could also have an impact on the parents and carers of the

children affected. Any change concerning children and young people has the potential to affect the wider family and those with parental responsibility. Under the Equality Act 2010 parents and carers of average age may be affected.

Consultation responses

3.4 Through public consultation with stakeholders a number of positive impacts have been identified on how the proposed policy could impact on the children and young people affected.

3.5 The responses received through consultation were **very supportive of the proposed policy** in particular the proposal to introduce free non-statutory travel to pupils attending Voluntary Aided (Faith) schools which are not their nearest suitable school and pupils attending Welsh medium schools which are not their nearest suitable school.

3.6 Consultation responses suggested that Faith schools are suitable schools for the faith school children who choose to attend them and felt the need to provide free transport on a discretionary basis is unnecessary and argued that free transport should be afforded to both Faith and Welsh medium schools under Section 3 of the Measure. They went further to suggest that Neath Port Talbot County Borough Council should state that Faith, English medium and Welsh medium schools are all suitable schools (within a catchment area).

3.7 Section 3 of the Learner Travel (Wales) Measure 2008 imposes a duty on local authorities to provide free home to school transport for learners of compulsory school age to their nearest suitable school provided the distance criteria are met.

3.8 Section 3 (6) of the Measure says that a school... 'is suitable for a child if the education or training provided there is suitable, having regard to the age, ability and aptitudes of the child and any learning difficulties he or she may have'. The Operational Guidance issued by the Welsh Government makes it clear that whilst parents and learners may express a preference for a particular type or language provision or faith school, the Measure does not confer on those parents and learners any rights to free transport to their preferred school unless that school is determined by the local authority to be their nearest suitable school and the distance criteria is met.

3.9 The local authority proposes to provide free transport to Voluntary Aided schools based on the statutory distance criteria regardless of whether the school is the nearest available school for that child. The Voluntary Aided (Faith) school (based on the parental choice made) is effectively deemed to be the nearest suitable school for the child, and the statutory distance criteria is then applied.

The proposed policy will have a positive impact on pupil choice with particular reference to parents/carers of pupils attending schools because of denominational preference (Faith Schools) or because of preference for the Welsh language.

4.0 Impact on Religion or Belief

4.1 Using the Service User data from September 2016 194 pupils are currently using Home to School Transport provision to a Faith Primary or Secondary School within Neath Port Talbot. This represents approximately 15.59% of the total primary and secondary Faith school pupils. This can be broken down into Primary 12.09% and Secondary at 19.79%.

4.2 The National Assembly for Wales in their Research Briefing 'Home to School Transport – A Guide for Constituents' (June 2016) Section 4 states that Schedule 3, Part 2, section 11 of the Equality Act 2010 includes exceptions in relation to religious or belief-related discrimination, the provisions of the Equality Act 2010 do not apply with regard to

transport to or from school. It goes on to state that it is legal to provide more favourable treatment to pupils of one particular religion or belief over another type of religion or belief. However, local authorities still need to ensure that their transport policies do not unlawfully discriminate in relation to other protected characteristics or contravene the Human Rights Act and also that they comply with the statutory Learner Travel Guidance. The public sector equality duty also applies.

4.3 The School Standards and Framework Act 1998 allows parents and learners to express a preference for a particular school. If preference is exercised and the chosen school is not the nearest suitable school agreed by the local authority, the learner is not entitled to free transport provision. However, the Measure provides local authorities with powers to provide discretionary home to school transport for learners who are not attending their nearest suitable school in a range of circumstances.

4.4 Neither the child's or parent's language preference or mother tongue, nor religious faith or conviction of the child or his or her parent have any bearing on whether a school is considered suitable for these purposes. However, it is noteworthy that in light of recent judicial review challenges, some Local Authorities have reviewed their Home to Transport policies and now go beyond their statutory duty to give consideration to language and faith preferences when determining the 'nearest' school.

4.5 There is a potential impact due to Faith Schools being dispersed geographically across the Local Authority area i.e. pupils are more likely to live further away from a Faith School.

Consultation Responses

4.6 The current position is that children attending a faith school that is not their nearest suitable school are not entitled to travel arrangements. Consultation responses welcomed the proposed changes to provide free transport to Voluntary Aided schools based on the statutory distance criteria regardless of whether the school is the nearest available school for that child. The Voluntary Aided (Faith) school (based on the parental choice made) is effectively deemed to be the nearest suitable school for the child, and the statutory distance criteria is then applied.

4.7 68.69% (520) of respondents identified as Christian in their religion/belief. The overall response to how respondents felt about the proposals in general for home to school travel is very positive with 94.2% (715) agreeing, 3.56% (27) disagreeing and 2.24% who didn't know. Further to this 100% of those that responded to the proposals in general i.e. 704 responses 100% agreed with all of them.

4.8 In particular responses in relation to those pupils who do not meet the criteria for free school transport, and where it is proposed that the local authority exercises its discretionary powers as outlined in Section 6 of the Learner Travel Measure to provide free home to school travel for pupils attending both Voluntary Aided (Faith) education and Welsh medium education has been very positively received and supported this proposal by the local authority emphatically. Respondents felt that the local authority would be acting in an inclusive and non-discriminatory way treating the Voluntary Aided schools in the same way as other schools in the County Borough.

4.9 Therefore children attending a faith school would benefit from the proposed change to the policy.

5.0 Impact on Race

5.1 The all Wales Schools Census Results July 2016 of the total number of pupils aged 5 or over at primary, middle, secondary and special schools in Wales, 89.4 per cent were classed as White British, with the percentage of pupils whose ethnic background was classified as minority ethnic origin was 10.1% and 0.5% were unknown or not stated.

5.2 In comparison of the all schools total of 20751 pupils in Neath Port Talbot 5.99% i.e. 1243 are Non White British 5.7% i.e. 1183 are English as an Additional Language (EAL) with 88.31% i.e. 18325 of the population identifying as White (Welsh/British).

5.3 In considering the local data there are schools in Neath Port Talbot where the statistics show percentages above the national average in relation to the number of Non White British percentages. Data shows, the highest percentage of Non White British pupils attending a Secondary school at 10.78% (61) are those that attend a Faith school. The highest percentage of Non White British pupils attending a primary school is 31.25% i.e. 30 pupils at Llansawel Primary school, with St Joseph's Catholic Junior School who have 20.77% i.e. 27 pupils who identify as Non White British. Currently the local authority is not able to identify how many of pupils access the Home to Transport provision disaggregated by all protected characteristics under the Equality Act 2010.

5.4 There are less Faith Schools in Neath Port Talbot than non-Faith schools; therefore they are more dispersed geographically across the Local Authority area. This means that there is a potential impact for learners with the protected characteristic of Race attending a Faith School as they are more likely to live outside the catchment area than an English or Welsh medium school.

What did the consultation tell us?

5.5 Consultation responses identified that the highest percentage of Non White British pupils attending a Secondary school are those that attend a Faith school when compared with other schools in Neath Port Talbot and welcomed the review of the current policy.

5.6 The current position is that children attending a faith school (who are more likely to have the protected characteristic of being non-white British) that is not their nearest suitable school are not entitled to travel arrangements under the policy. Under the proposed changes children would be entitled to transport and respondents to the consultation welcomed this change. Therefore, children attending a faith school, who are more likely to have the protected characteristic of being non-white British would also benefit from the proposed change to the policy.

6.0 Impact on Welsh Language

6.1 There is an identified potential impact on Welsh language when considering the data collected from both PLASC and the Welsh Government School Census Results 2016 in relation to the review/proposal of the Home to School Transport policy.

6.2 378 primary age pupils currently use the Home to School Transport provision which makes up 39.9% of the current service users. Out of the 2176 primary age pupils throughout the County Borough that equates to 17.37% of the population of Welsh Medium Primary learners.

6.3 843 secondary age pupils currently use the Home to School Transport provision which makes up 31.65% of the current service users. Out of the 863 (PLASC) secondary age pupils throughout the County Borough that equates to 97.68% of the population of Welsh Medium Secondary learners. Out of the 1046 (Welsh Government School Census Results 2016)

secondary age pupils throughout the County Borough that equates to 80.59% of the population of Welsh Medium Secondary learners.

6.4 Welsh Medium schools are geographically dispersed and more pupils attending Welsh medium schools could be affected i.e. pupils are more likely to live further away from a Welsh Medium School, particularly in the case of secondary age pupils.

What did the consultation tell us?

6.5 The proposed policy would provide free transport for children attending their catchment area English medium school (subject to meeting the distance criteria) even if it is not their nearest suitable school. The proposed policy would provide free transport for children attending their catchment area Welsh medium school (subject to meeting the distance criteria) even if it is not their nearest suitable school.

6.6 Respondents to the consultation were very supportive of the proposed changes to the current policy and welcomed the provision of transport to both Voluntary Aided (Faith) Schools and Welsh Medium schools suggesting that it would be inclusive and non-discriminatory. Therefore, the proposed policy will treat those who wish to attend Welsh Medium or English medium schools on a fair and equal basis.

6.7 The proposed policy will have a positive impact on pupil choice with particular reference to parents/carers of pupils attending schools because of denominational preference (Faith Schools) or because of preference for the Welsh language.

7.0 Additional factors for consideration

7.1 The Welsh Government School Census Results 2016 provides details that the number of compulsory aged school pupils eligible for free meals has decreased from 68,388 pupils in January 2015 to 67,040 pupils in January 2016. The percentage of compulsory aged school pupils known to be eligible for free meals has decreased from 18.8 in January 2015 to 18.4 in January 2016. The percentage of compulsory aged school pupils known to be eligible for free meals was highest in special schools at 43.1%. The number of compulsory aged school aged pupils eligible for free meals was highest in Cardiff at 9,007 and lowest in Ceredigion. Powys had the lowest percentage of compulsory aged school pupils eligible for free meals at 10.7%, and Blaenau Gwent had the highest at 27.7%

7.2 The Welsh Government School Census Results 2016 provide local data for Neath Port Talbot where the number of Primary aged pupils eligible for free meals is 2,198 or 23.8%. The number of Neath Port Talbot secondary aged pupils is 1622 or 22%. The number of compulsory aged school pupils attending special schools is 114 or 56.2%.

7.3 Local data for Primary, Secondary and Special Schools for pupils aged 5-15 years is above average in all three areas.

	National data	Local data
Primary	19% (38,943)	23.8% (2,198)
Secondary	17.1% (26,069)	22% (1,622)
Special Schools	43.1% (1,423)	56.2% (114)
All Schools	18.4%(67,040)	23.4% (3,934)

7.4 The Denominational secondary school in Neath Port Talbot has 26% i.e. 148 pupils that are eligible for free school meals and two Primary Denominational schools that are above the national average with 25% of their pupils also eligible for free school meals. Given the data relating to Race and Religion/Belief, it is worthy of noting that there could be a potential

cumulative impact in relation to FSM/Race/Religion/Faith. However, there was no evidence of any potential impact from the consultation exercise.

What did the consultation tell us?

7.5 Consultation responses recognised that the proposed changes will have a positive impact on those parents/carers on lower incomes as the policy will extend its provision of home to school transport therefore providing pupil/parent choice and ensuring that parents have the opportunity to choose the school they wish to send their child to without having financial reasons being part of the decision which could mainly effect the more deprived and financially less fortunate.

7.6 Other responses suggested that parents had been considering reducing their working hours to allow them to transport their children to and from school and welcomed the proposed review of the policy suggesting that the change will allow them to continue working full time.

7.7 Respondents were asked if they had anything else they would like to say about the Home to School Travel Policy 2017 – 387 responses were received. Consultation responses to this question were positive regarding the revised policy and the vast majority of respondents suggested and a number urged that the new policy should be adopted with immediate effect and not wait until September 2017.

7.8 The Learner Travel Information (Wales) Regulations 2009 requires that any change to the Council's current Home to School Travel Policy must be published before the 1st October of the year preceding the academic year to which the information relates. The implementation in September 2017 is technically in breach of Regulations however as the proposed policy is either as generous or more generous than the current policy for every pupil it is considered that it would be reasonable to introduce the policy changes in September 2017 notwithstanding the breach of the Regulations.

7.9 Consultation responses did not identify any disproportionate adverse or positive impact in relation to Gender Reassignment, Marriage & Civil Partnership, Pregnancy and Maternity, Sex or Sexual Orientation.

Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Extend the collection of equality monitoring data to include the protected characteristics under the Equality Act 2010 as appropriate to reduce the gap in current data collection and to provide us with additional relevant local data for future reference	Transport?	September 2017?	Increased collection of data that extends across protected characteristics of service users	
To monitor the take up of home to school travel provision by protected characteristics	Transport?	September 2018	Equality monitoring data will be collected to identify if there is any disproportionate impact	
To monitor the applications for assistance with home to school travel by protected characteristics	Chris Millis Head of Participation	September 2018	Equality monitoring data will be collected to identify if there is any disproportionate impact	
To monitor appeals against a home to school travel decision by protected characteristics	Chris Millis Head of Participation	September 2018	Equality monitoring data will be collected to identify if there is any disproportionate impact	