KENT COUNTY COUNCIL
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)

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Directorate:
Public Transport Department, Highways, Transportation and Waste (HT&W), Growth, Environment and Transport (GET)

Name of policy, procedure, project or service
Kent County Council Bus Funding Review

What is being assessed?
Kent County Council needs to reduce the level of funding that it commits to the provision of non-commercially viable but Socially Necessary Public Bus Services. This Equality Impact Assessment (EqIA) assesses the impact of the Council’s approach to making this saving and considers the implications for current passengers, particularly those who are part of a protected group within the Equality Act. Separate EQIA’s will be completed for all of the individual bus services that could change because of the subsidy reduction and the conclusions of these will be used to inform final outcomes.

Wider context
Over the past five years Council budgets have come under increasing pressure as Central Government has reduced its funding year on year. KCC has already had to reduce its revenue expenditure by £433m since the start of 2011-12 and the budget for 2016-17 requires a further £80.8m of savings.

To contribute to the wider savings demand of the Council, the budget that pays for non-commercially viable but socially necessary bus services is being reduced by £2m. To date, over £1m in savings have been achieved through efficiencies and other intelligent measures and this has been achieved without noticeable impact upon the travelling public.

In order to achieve a £500k saving in 2016 / 17, the existing subsidised network is going to have to be rationalised and in some instances services will need to change or be reduced and some journeys will be withdrawn completely.

The approach adopted by the Council will seek to protect the most critical journeys being made, particularly where they impact on more vulnerable groups of society, most notably those identified in the Equality Act such as older, disabled and persons with mobility impairments and those that for other reasons are more reliant on the bus.

To do so, the focus of the review is to consider reducing services or withdrawing journeys where alternative services and journeys continue to operate at different times or on other days of the week. This has placed the focus on journeys operating in the morning, in the evening or on Sundays and on areas that would continue to have bus services operating at other times of the day or on other days of the week. The Council has also taken the decision to protect Kent Karrier (dial-a-ride) services from this review as it is acknowledged that by definition these represent the only transport links for rural areas or the only form of available transport for disabled members. The Council also recognises that it will need to monitor Kent Karrier services in light of the subsidy reductions owing for the potential for additional demand to be placed upon them. Routes that currently provide journeys to school have also been protected.
Responsible Owner/ Senior Officer

Steve Pay, KCC Public Transport Planning and Operations Manager
Steve Benjamin, KCC Public Transport Planner

Date of Initial Screening

1st June – 3rd July 2015

Date of Full EqIA:

22nd June 2015 – end May 2016

Informed by;

Full Public Consultation: 21st March to 15th May 2016
On bus inspections: ongoing
Operator and Community Engagement: ongoing
Acquired contractual information and officer knowledge: ongoing

<table>
<thead>
<tr>
<th>Version</th>
<th>Author</th>
<th>Date</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Steve Pay</td>
<td>01.06.2015</td>
<td>Initial screening.</td>
</tr>
<tr>
<td>2</td>
<td>Steve Pay</td>
<td>17.11.2015</td>
<td>To take account of comments provided by the Equality and Diversity Team</td>
</tr>
<tr>
<td>3</td>
<td>Steve Pay</td>
<td>20.11.15</td>
<td>To take account of further comments from CL</td>
</tr>
<tr>
<td>4</td>
<td>Steve Pay</td>
<td>07.01.16</td>
<td>To take account of refinement of service changes proposed.</td>
</tr>
<tr>
<td>5</td>
<td>Steve Pay</td>
<td>27.07.16</td>
<td>Final EQIA completed following consultation.</td>
</tr>
</tbody>
</table>
## Screening Grid

<table>
<thead>
<tr>
<th>Characteristic</th>
<th>Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favourably than others in Kent? YES/NO If yes how?</th>
<th>Assessment of potential impact</th>
<th>Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?</th>
<th>Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Positive</td>
<td>Negative</td>
<td>Internal action must be included in Action Plan</td>
</tr>
<tr>
<td>Age</td>
<td>Yes</td>
<td>None</td>
<td>Medium</td>
<td>It has been identified that older persons are potentially more reliant on the public transport network than other protected groups or members of the wider public.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>The process adopted by the Council will seek to identify services used by older persons and use this information to inform an impact score attributable to each service. The impact score will be used to identify services / changes where the saving proposed will have the most detrimental impact.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>The Council will work with operators to replace services at lesser or no cost and may need to look to develop other transport solutions for this group, namely its Kent Karrier (dial-a-ride) network and other community transport schemes. Where particular requirements are identified that cannot be provided for through these means, then we will seek to identify alternative transport options for users such as voluntary car schemes.</td>
</tr>
<tr>
<td>Disability</td>
<td>Yes</td>
<td>None</td>
<td>High</td>
<td>It has been identified that disabled people such as those with a mobility or visual impairment are potentially more reliant on the public transport network than other protected groups or members of the wider public because their disability may mean they cannot drive.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Yes. The approach being adopted by the Council to rationalise the network, will seek to protect those services from reduction or withdrawal.</td>
</tr>
</tbody>
</table>

Updated 10/08/2016
The process adopted by the Council will seek to identify services used by people with disabilities and use this information to inform an impact score attributable to each service. The impact score will be used to identify services / changes where the saving proposed will have the most detrimental impact.

The Council will work with operators to replace services at lesser or no cost and may need to look to develop other transport solutions for this group, namely its Kent Karrier (dial-a-ride) network. Where particular requirements are identified that cannot be provided through these means, then we will seek to identify alternative transport options for users such as voluntary car schemes.

In respect of this group, the Council is also minded of the need to ensure that information regarding the possible impact is accessible to all users. In addition to usual measures which include the provision of on bus notices, the Council will also seek to communicate the consultation through specialist groups such as the Kent Association for the Blind to ensure the accessibility of information. The consultation documentation will also be available in alternative formats.

<table>
<thead>
<tr>
<th>Gender</th>
<th>No</th>
<th>It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gender identity</td>
<td>No</td>
<td>It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.</td>
</tr>
<tr>
<td>Race</td>
<td>No</td>
<td>It is not considered that the withdrawal or reduction of a bus service has any greater impact on this group than it does on the general public.</td>
</tr>
<tr>
<td>Category</td>
<td>Consideration</td>
<td>Impact Score</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>---------------</td>
<td>--------------</td>
</tr>
<tr>
<td>Religion or belief</td>
<td>No</td>
<td>Low</td>
</tr>
<tr>
<td>Sexual orientation</td>
<td>No</td>
<td>Low</td>
</tr>
<tr>
<td>Pregnancy and maternity</td>
<td>No</td>
<td>Low</td>
</tr>
<tr>
<td>Marriage and Civil Partnerships</td>
<td>No</td>
<td>Low</td>
</tr>
<tr>
<td>Carer's responsibilities</td>
<td>Yes</td>
<td>None</td>
</tr>
</tbody>
</table>

Yes. The approach being adopted by the Council to rationalise the network, will seek to protect those services from reduction or withdrawal.
Part 1: INITIAL SCREENING

Approach

The Council is committed to ensuring that all decisions made in relation to the saving are done so with a full understanding of the service, its users and the impact of changes upon them. We will also ensure that we have exhausted all other options before we get to the stage of having to reduce or withdraw services and journeys.

The Council will collate various forms of information, including data gathered from ongoing bus inspections and the responses to the consultation and use this to assess the impact of any proposed change against the Council's criteria for supporting bus services and the Equalities Act.

In order to limit the impact on passengers, the Council has focussed its review on services and journeys where alternative public transport will still be available. In doing so, much of the focus of the review is on those services and journeys running in the early mornings, in the evenings or on Saturdays and Sundays. Services which represent the only public transport for the areas served, journeys carrying children to school and the Council's Kent Karrier services are not included as part of this review.

To enable us to respond to consultation, no final decisions have been made in order that we can use the consultation and other information about the services to inform consideration about alternative provision or the need to make the savings in a different way using the final EQIAs as a guide.

To help inform the final outcomes, the Council has developed an ‘Impact Scoring’ system which will be used to identify changes with most detrimental impact on service users. The Impact Score will take account of the impact upon protected groups within the Equalities Act and also of the Council’s own criteria for the support of public bus services. The intention is that we will use the ‘Impact Scores’ to identify service changes that will have the most negative impact on users and particular user types.

Initially, every service action identified, has been determined to carry a Risk rating of 12 (classified as ‘medium’) using KCC’s corporate risk matrix. This score has been arrived at as it is acknowledged that any change or reduction to a bus service will likely have a significant and detrimental impact upon its users.

As part of the initial screening exercise, consideration has then also been given to the user profile of particular services using information acquired through the management of the service contract (ticket types) and existing officer and operator knowledge. This has enabled us to identify certain user types who against the Equalities Act and the County Council’s own criteria for supporting bus services, are more impacted by changes to bus services. The initial screening will be complimented by further information gathered through on bus surveys completed by the Council, from other information gained from operators and using information received in response to the consultation exercise about the particular services and the users of them.

Process

It has been determined that of the groups that are identified as ‘protected’ within the Equalities Act, older people, disabled people and carers are potentially more disadvantaged by the withdrawal or reduction of a bus service compared to the rest of society. As an identified group, if it is established that a service conveys these user types, then additional Impact Points against each user type will be added as identified below.
Older Persons: 2 Impact Points

Disabled: 2 Impact Points

Carers: 1 Impact Point

KCC’s criteria for the support of bus services identifies journeys that provide the only access to; Education, Employment, Healthcare and Essential (food) Shopping as being the priority for funding. To take account of this, the focus of savings is to identify contracts and journeys operating on early mornings, evenings, Saturdays and Sundays and in doing so protect journeys being made for the purposes of employment and education. Journeys being made to access healthcare or food shopping can often be more flexible and therefore not time or day critical and can therefore be made on remaining commercial bus services i.e. those at different times or on different days. As such, no weighting is given to these services or journeys unless there are particular users who cannot travel at different times of the day or on a different day of the week.

Where it is identified that a service represents that only means of accessing education, employment, healthcare or essential food shopping then a further 1 Impact Point in each instance will be added to the Impact Score.

A worked example is below.

**Service X**

In this instance, as part of the initial impact assessment, service X has been identified as being used by older persons (travelling on an English National Concessionary Travel Pass) and so an additional 2 points has been added to base rating of 12. Therefore the risk rating identified through the Initial Impact Assessment is 14 which is classed a ‘Medium’ impact.

<table>
<thead>
<tr>
<th>Service X</th>
<th>Impact Rating (12 unless unique circumstances are identified)</th>
<th>12</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Evidence of Older Persons? (2 points if identified)</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Evidence of Disabled Passengers? (2 points if identified)</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Evidence of Passenger travelling as a ‘Carer’ (1 point if identified)</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Does the service provide the only means of accessing employment for any passenger? (1 point if identified)</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Does the service provide the only means of accessing education? (1 point if identified)</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Does the service provide the only means of accessing healthcare? (1 point if identified)</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>Does the service provide the only means of accessing essential shopping? (1 point if identified)</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td>14</td>
</tr>
</tbody>
</table>

Following the consultation process and having completed further surveys of the service, the Impact scores will be updated to take account of instances where we identify particular passenger types or journey purposes. For example, in the event that we identify a disabled passenger on service X then a further 2 impact points would be added. If we then identified that the service was used by passengers to get to or from work, then an additional 1 point would be added. In this example therefore, the Impact score identified would be 17 which is classed as ‘High’ impact.
The final Impact Scores for each service will be used to identify services with the most detrimental impact upon service users, particularly where they are from a protected group and will then consider how we protect these services or provide reasonable alternatives for the affected users.

The project as a whole has initially been identified as carrying a ‘medium’ risk owing to there inevitably being negative implications for current passengers. However, the final risk weighting will be informed by the consultation and the completion of EQIAs for each service potentially affected.

**Aims and Objectives**

Ultimately a saving of around £500k needs to be realised and this will result in some service reductions and loss of journeys.

It is acknowledged that this cannot be achieved without any detrimental impact on communities and the objective of the Council is therefore to achieve the saving but with the most limited impact on bus users, having exhausted all opportunities for other savings measures and having taken account of the Equalities Act.

To achieve this, the Council will ensure that the process is robust and properly governed, taking account of all information. Most critically, the consultation process will genuinely be used to identify the services / contracts where the impact is greatest upon service users.

**Beneficiaries**

Ultimately there are no beneficiaries from an overall reduction in subsidy which will result in some reduction to overall service. The process identified seeks to minimise the extent of the negative impact.

**Information and Data**

Individual EqIA’s will be informed by a range of intelligence including;

- Passenger and ticketing information provided to the Council by operators throughout the life of the contract. This will inform the initial screening and enables the Council to identify some passenger groups through ticket types.
- On bus inspections that will complement the passenger data and will seek to identify particular user groups (such as the older persons and persons with mobility impairments) and particular travel habits and journey purpose (i.e. day / time critical journeys not achievable on other, remaining public transport).
- Public consultation that will run from 21st March until 15th May and will invite information from users about their journey purpose and the impact of the proposed changes.
- Bus operator, passenger and wider resident engagement

**Involvement and Engagement**

The following parties will be engaged;

- Bus operators
- Bus Users
- User and Specialist Groups (Aged UK, Kent Association for the Blind, Mobility and Access Groups etc.)
- Wider Public (through full public consultation)
- KCC elected members
Potential Impact

Initial screening (22/06/2015):

Unknown: we know that any change, reduction or withdrawal to a bus service will have a negative impact upon users of the service who have become reliant upon it. However, until will complete further, more exhaustive work such as surveys and public consultation, the total impact on users generally and from an EQIA perspective cannot be identified.

Final findings: (to be informed by inspections, public engagement and consultation)

Adverse Impact:

Initial screening (22/06/2015):

Level Unknown: there will be adverse impact but the precise extent of this is unknown until we have we know that any change, reduction or withdrawal to a bus service will have completed a full Impact Assessment.

Final findings: (to be informed by inspections, public engagement and consultation)

Positive Impact:

Ultimately there will be no positive impact for users of services / journeys subject to reduction or withdrawal.

JUDGEMENT

Option 1 – Screening Sufficient                   NO

Option 2 – Internal Action Required         YES completion of Action Plan as part of the EQIA identified at the end of this document

Option 3 – Full Impact Assessment          YES

Required as;

• the potential impact of the savings measures proposed may affect a large number of Kent residents
• some of these will be from listed groups with particular characteristics
• the full impact is not yet known and will be informed by further intelligence
• the project will be subject to a full public consultation

Action Plan

Savings need to be materialised from financial year 2016 / 17 and the contracts governing these transport arrangements demand that 90 days’ notice is given to bus operators if wishing to cease or fundamentally alter the provision.

The Council has therefore formed a program that allows sufficient time (following the initial screening exercise) to complete a range of activities enabling it to understand the services concerned in more detail and critically the impact of particular user and journey types. The range of activities includes but is not restricted to; on bus inspections, full public consultation, operator engagement and engagement with bus passengers and the wider community.

We will work closely with operators to explore means of reducing subsidy and materialising the saving without the need for service reduction. We shall also understand the need to
March 2016

develop the Kent Karrier Dial-a-Ride network to offer reasonable alternatives to areas and users affected by changes to bus services.

Only once alternative options have been exhausted will the Council look to materialise the outstanding savings target through the direct reduction in subsidy and withdrawal of contracts. The initial screening and the updating of EqIA’s to amend its approach and tailor the range of measures primarily by protecting services where further understanding intelligence identifies that the reduction or removal of a service will result in a particularly adverse impact to the bus user particularly where they are from an identified group.

The scoring identified as part of the initial screening exercise, will be updated to take account of the actions identified above and final ‘impact scores’ will be used to inform the final range of measures required to accommodate the reduced budget available.

The process will have robust governance from start to finish, will seek approval of senior and executive officers, the Cabinet Member for Highways Transportation & Waste, the Environment & Transport Cabinet Committee.

Monitoring and Review

The project will be led by KCC’s Public Transport, Planning and Operations Manager who will report into an informal Governance Board consisting of the following senior officers and political representatives; Head of Public Transport, Director of Highways Transportation & Waste, Corporate Director for Growth Environment & Transport and the Cabinet Member for Highways Transportation & Waste. Final sign off of proposed and final measures will be subject to the approval of KCC’s Cabinet having been promoted through the Governance Board.

Initial screening and a full EqIA will be completed against the wider approach and against all of the individual service measures proposed. EqIA’s will updated on an ongoing basis throughout the process, most notably to take account of intelligence gleaned through; operator engagement, service inspections and public consultation.

Updated EqIA’s (updated and informed by further intelligence) will inform the final range of measures. A full audit trail for all activities will be retained and the initial approach and the final range of measures will be considered by KCC’s Cabinet Committee.

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed: SP Name: Steve Pay
Job Title: Public Transport Planning and Operations Manager
Date: 19/02/16

DMT Member

Signed: PL Name: Phil Lightowler
Job Title: Head of Public Transport
Date: 19/02/16

Updated 10/08/2016  10  KCC/EqIA2013/October
### Equality Impact Assessment Action Plan

<table>
<thead>
<tr>
<th>Protected Characteristic</th>
<th>Issues identified</th>
<th>Action to be taken</th>
<th>Expected outcomes</th>
<th>Owner</th>
<th>Timescale</th>
<th>Cost implications</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age – older persons</td>
<td>Greater reliance on bus services heightens the impact of any service withdrawal or reduction on this user group.</td>
<td>Approach identified will seek to give greater priority and protection to services identified as carrying this user group. The Council will seek alternative solutions with bus operators and where necessary look to develop the Kent Karrier network to provide alternative transport.</td>
<td>To, where possible, protect services carrying this user group.</td>
<td>Steve Pay, Public Transport Planning and Operations Manager</td>
<td>Decisions to be made for implementation in the Summer 2016</td>
<td>£500k per annum if not materialising the measures required.</td>
</tr>
<tr>
<td>Disabled</td>
<td>Greater reliance on bus services heightens the impact of any service withdrawal or reduction on this user group. Access to information about the consultation and any subsequent service changes which could be compromised by disability, most notably visual impairment.</td>
<td>Approach identified will seek to give greater priority and protection to services identified as carrying this user group. The Council will seek alternative solutions with bus operators and where necessary look to develop the Kent Karrier network to provide alternative transport. The Council will ensure that disability does not prohibit</td>
<td>To, where possible, protect services carrying this user group.</td>
<td>Steve Pay, Public Transport Planning and Operations Manager</td>
<td>Decisions to be made for implementation in the Summer 2016</td>
<td>£500k per annum if not materialising the measures required.</td>
</tr>
<tr>
<td>Carer</td>
<td>Greater reliance on bus services heightens the impact of any service withdrawal or reduction on this user group.</td>
<td>Access to information through the engagement of appropriate representative groups and use of alternative formats.</td>
<td>Approach identified will seek to give greater priority and protection to services identified as carrying this user group. The Council will seek alternative solutions with bus operators and where necessary look to develop the Kent Karrier network to provide alternative transport.</td>
<td>To, where possible, protect services carrying this user group.</td>
<td>Steve Pay, Public Transport Planning and Operations Manager</td>
<td>Decisions to be made for implementation in the Summer 2016</td>
</tr>
</tbody>
</table>
March 2016

Final Assessment and Conclusions 28/07/16 (completed following closure of public consultation).

This document should be read in conjunction with the individual service EqIAs which have been similarly updated following closure of the consultation and analysis of the results.

Our approach sought to use a public consultation responses and other available information (data, on bus surveys etc.) to attribute an impact score for each of the service changes being proposed. The public consultation ran from 21st March to 15th May 2016 following which responses have been analysed and used to update Impact Scores, Equality Impact Assessments and to consider the more precise implications of the changes proposed.

The consultation was supported by a communications plan to ensure that stakeholders knew about the consultation. A range of promotional activities were undertaken including, posters and distribution of literature on buses, direct emails to stakeholder organisations, posters and hard copies in Libraries and Gateways, media coverage (newspapers, online, radio and television news) and social media. Emails were sent to organisations that represent certain service user groups (with protected characteristics), such as, Carers First, Age UK, and Kent Association for the Blind, notifying them of the launch of the consultation and asking them to disseminate this information to their service users. Bus inspectors travelled on affected routes during the consultation process and raised awareness amongst passengers and all information was available in alternative formats and different languages on request (contact details were included on all consultation material).

The consultation document was also produced in an Easy Read format for people with learning difficulties or may have had difficulty in understanding the standard consultation document (this was downloaded 76 times from our website) and a Word version (223 downloads) was available to ensure the consultation was accessible to people using audio transcription software. We received 47 requests for hard copies and three requests for Large Print versions, which were provided. Most consultees completed the questionnaire online but we received 46 hard copies, including 4 Easy Read versions.

The Council are confident that all affected service users have had an awareness of the consultation and changes being proposed, and have had the opportunity to provide feedback.

Strong governance has been a feature that was committed to and has been ensured throughout the process. The analysis of the consultation responses was carried out by an independent market research consultancy and presented to the Public Transport team and Cabinet Member for Environment and Transport on 3rd June. Public Transport Officers have been involved in the detailed analysis of consultation responses and of service impacts and these have informed the recommendations made. These recommendations have been considered by KCC’s Head of Public Transport, Director of Highways, Transportation and Waste, the Corporate Director for Growth, Environment and Transport and the Cabinet Member. A report was considered by KCC’s Environment and Transport Cabinet Committee on 8th July. It is felt that governance of the project is strong and has afforded the opportunity for a variety of different concerns and ideas to be considered.

The Impact Score mechanism takes account of both Equality elements (namely use of the service by protected groups within equalities legislation) and the Council’s own criteria for the support of socially necessary bus services. Final Impact Scores are tightly grouped, ranging from 16 – 18 points across all of the 17 services proposed for change. This confirms the held view of the Council that there is of course a negative impact on service users bought about by any reduction in service or the removal of journeys and confirms the held belief of the Council
as to the sensitivity of the issue and the need to carefully consider the implications for all such changes.

The close proximity of service scores owes to the fact that there is evidence of use of nearly all services by elderly and disabled passengers and some more limited use by users with caring responsibilities. These groups are protected by equality legislation and had been identified by the Council as being potentially more greatly impacted by the withdrawal of a bus service over other groups of society. There was evidence that other protected groups were represented within the consultation responses but these have not been given greater weighting over other service users as the Council had already identified that the impact on other groups was not heightened beyond that of other, general service users. The close proximity of the Impact Scores means that it is hard to separate services and identify changes that perhaps should not be progressed over those that should. The more individual implications of the changes proposed have therefore been considered and used to develop a range of measures that seek to mitigate impacts from both an Equalities and more general service user impact perspective.

The consultation questionnaire included a question asking for feedback on the consultation stage EqIAs. 140 respondents gave a view on the EqIAs. Some mentioned that they were happy with it but others felt insufficient weighting was given to certain groups, reflecting feedback on the scoring criteria:

- Pregnancy & maternity (pregnant women less able to walk as an alternative)
- Religion (impact on accessing church services)
- Gender/ Sexual orientation (importance of feeling safe while travelling)
- Children/ young people (unable to drive themselves)

The views presented with respect to the EqIA’s have been carefully considered by the Council but it was not felt appropriate to adjust the scoring method for a number of reasons. Some consultees raised the need for greater consideration to be given to groups which are not ‘protected’ under the Equalities Act, such as, people/families on low incomes and people who

### Views on EqIAs

A total of 140 respondents gave a view on the EqIAs (~33%)

Some mentioned that they were happy with the EqIA approach (and this included both users and a smaller proportion of non-users) – but others felt insufficient weighting was given to certain groups, reflecting feedback on the scoring criteria:

- Pregnancy & maternity (pregnant women less able to walk as an alternative)
- Religion (impact on accessing church services)
- Gender/ Sexual orientation (importance of feeling safe while travelling)
- Children/ young people (unable to drive themselves)
March 2016

suffer from social isolation. Concerns over the impact on people because of their gender or sexuality, whilst entirely understood, would be very difficult to provide weighting to as it would be the case that every service identified would have evidence of usage by people in these groups. Maternity and Pregnancy related implications are similarly valid but difficult to mitigate in this instance owing to the temporary nature of this state i.e. a service conveying a pregnant passenger at the point of the consultation would not necessarily still be carrying a pregnant passenger following any decision whereas another route / journey might by that stage be doing so. As opposed to creating a new scoring methodology it was instead considered that these implications be identified and considered individually.

Individual implications and any actions to mitigate them are identified on the individual service EqIA’s and also on the summary table included as an appendix to this report. Analysis of the responses identified that three service changes (relating to service 123, 12RL and 541/2/4) attracted over 1/3 of the total number of responses. Response rates for all other service changes were far more limited and it could be considered that this further supports the view that the majority of responders agreed with the principles of the approach proposed.

In respect of service 541/2/4, the service represents the only public transport to a number of rural communities and concern was raised about the implications for rural isolation for its users who in many instances are elderly and / or disabled. Taking account of all of the factors, the Council has decided to defer the decision to implement changes to this service whilst it develops some further mitigation, possibly through the greater use of community transport and the development of voluntary car schemes. In the absence of these, it is felt that the impact on users both from an equalities perspective and more generally is too great as to progress the measures proposed.

Although services 123 and 12RL have attracted high response rates, analysis of the individual concerns raised suggests that much of the stated impact will be negated by the alternative measures that are proposed as mitigation. In respect of both services new or additional bus services are proposed that will recreate the majority of the current journey options albeit in a slightly different way. The detail of the replacement services was not able to be provided as part of the consultation process and although they were referred to, the absence of being able to share new timetables and associated information is considered to be contributory to the concern raised and the rates of responses received. Particular issues and concerns over the reliability of replacement services have been noted and will be reflected in the final detail of replacement services and in the accepted need to ensure that detailed information is available with respect to the replacement services.

All other services attracted a far more limited number of responses. Whilst this is arguably indicative of general support or understanding of the need to make these changes and the approach adopted, the Council has been meticulous in wanting to understand any individual impacts on service users and where possible seek to mitigate them through variations to the measures proposed. In some instances, the Council has identified that it may be possible to work with the operator of the service concerned to make changes to the alternative services proposed and further reduce the impact of the subsidy withdrawal. These are indicated on the summary table.

Ultimately it is unfortunately the case that any service reduction will have impacts on service users. The discretionary nature of this service area does permit the Council to make such changes albeit it should be completely satisfied that Equality factors and wider implications have been properly considered and all efforts have been taken to mitigate them where possible. It is the firm belief of the Council that the approach adopted means that this is the case and KCC’s Cabinet for Environment and Transport therefore supported the
March 2016

recommendation to progress with all service changes proposed with the exception of that relating to service 541/2/4.

Publicity and communication will be key as the process moves towards implantation of the changes proposed and it is acknowledged that there is an equalities element to ensuring that all service users are aware of these changes. Service changes are expected to be implemented from October subject to negotiations with bus operators.

**Senior Officer**

Signed: SP Name: Steve Pay  
Job Title: Public Transport Planning and Operations Manager  
Date: 5th August 2016

**DMT Member**

Signed: PL Name: Phil Lightowler  
Job Title: Head of Public Transport  
Date: 5th August 2016
## Appendix A - Summary of services for review

<table>
<thead>
<tr>
<th>Service No.</th>
<th>Route</th>
<th>Response Themes</th>
<th>Mitigation and Actions</th>
<th>Initial Impact Score</th>
<th>Updated Impact Score</th>
<th>Estimated Journeys per annum</th>
<th>Responses</th>
<th>Elderly (%)</th>
<th>Disabled (%)</th>
<th>Carer (%)</th>
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</thead>
</table>
| 12RL        | Tenterden to Headcorn Railway Station | • Loss of Commuter Links  
• Adequacy and Reliability of replacement service | • Increased awareness of revised service 12 timetable  
• Review of timetable with Arriva with respect to reliability and ability to adjust | 14 | 17 | 15,435 | 51 | 27% | 6% | 6% |
| 2           | Ashford to Rolvenden (Evening Journeys on Monday to Saturday) | • Loss of service for commuters and shift workers  
• Loss of service for leisure activities  
• Increased travel costs | • There are no mitigating measure other than further discussion with Stagecoach to look at the potential for later commercial journeys | 14 | 18 | 8,075 | 20 | 45% | 15% | 5% |
| 89          | Maidstone to Coxheath | • Loss of service for commuters and shift workers  
• Impact on caring responsibilities  
• Driving/Taxis an option for some but concern about congestion | • Increase awareness of proposed Arriva service 5 route and timetable, which will partially replace journeys on the 89 | 15 | 17 | 14,519 | 13 | 31% | 8% | 23% |
<table>
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<tr>
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<th>Updated Impact Score</th>
<th>Estimated journeys per annum</th>
<th>Responses</th>
<th>Elderly (%)</th>
<th>Disabled (%)</th>
<th>Carer (%)</th>
</tr>
</thead>
</table>
| 5          | Maidstone to Hawkhurst       | • Changes to service 5 may result in passengers deciding to use their car instead due to the increase in journey time to cover Coxheath. This may increase pollution and congestion on local roads.  
• Concern over service 5 connections with trains. | • Increased awareness of revised Arriva 5 route and timetable.  
• Review of revised operation with Arriva to understand the effects of changing the route and timetable will have on train connections at Staplehurst. | 16                   | 17                   | 14,567                         | 5         | 60%         | 0%          | 20%       |
| 89         | Dover to Folkestone         | • Loss of service for commuters and shift workers  
• Impact on caring responsibilities  
• Feeling that the change will have a negative impact on all aspects of life  
• Reference to closure of rail link between Dover and Folkestone. | • Increased awareness of proposed Stagecoach 102 evening timetable  
• Review of revised operation with Stagecoach to understand if particular journey needs can be accommodated. | 14                   | 18                   | 68,109                         | 11        | 27%         | 27%         | 27%       |
<p>| 102        | Dover to Lydd                | See Service 89 above                                                            | See Service 89 above                                                                     | 14                   | 18                   | See service 89 above                 | 10        | 30%         | 20%         | 40%       |</p>
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</table>
| 123        | Kings Hill to West Malling Station | • Concerns that the new service will not be linked to train times  
• Concerns that the new service will not be reliable due to serving Maidstone as well  
• Negative impact on roads and environment if more people forced to use cars | • Increased awareness of the timetable for the new developer funded service  
• Review of intended timetable for new developer funded service to understand if particular train connections can be timetabled | 14                  | 17                  | 89,787          | 44                  | 11%      | 14%        | 5%          |           |
<p>| 203        | Benover to Paddock Wood        | • Loss of service on Mondays may mean some family commitments will need to be rearranged | • Increased awareness of Kent Karrier service provided by Kent County Council, as an alternative | 14                  | 17                  | 2,313           | 1                   | 0%       | 100%       | 100%        |           |
| 204        | Tonbridge to Underriver       | • Getting to another bus stop to access other services would be difficult on the day it will no longer be running | • Increased awareness of Kent Karrier service provided by Kent County Council | 14                  | 16                  | 2,500           | 2                   | 50%      | 50%        | 0%          |           |</p>
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<th>Carer (%)</th>
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</thead>
<tbody>
<tr>
<td>205</td>
<td>Tonbridge to Paddock Wood</td>
<td>• Concerns surrounding work commitments being disrupted.</td>
<td>• Increased awareness of commercial Autocar 205 timetable to be provided</td>
<td>14</td>
<td>16</td>
<td>4,650</td>
<td>6</td>
<td>50%</td>
<td>33%</td>
<td>0%</td>
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<td></td>
<td></td>
<td>• Concerns regarding replacement service not being as frequent.</td>
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<td></td>
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<td>• Train service between Paddock Wood and Tonbridge is more expensive than bus.</td>
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<tr>
<td>402</td>
<td>Tonbridge to Hildenborough</td>
<td>• Loss of journey for those users making personal trips to see family / friends</td>
<td>• Increased awareness of Arriva commercial 402 timetable</td>
<td>14</td>
<td>16</td>
<td>See 205</td>
<td>10</td>
<td>50%</td>
<td>10%</td>
<td>0%</td>
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<td></td>
<td></td>
<td>• Most users state that train is a viable alternative</td>
<td>• Increased awareness of train connections</td>
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<tr>
<td>217</td>
<td>Trench Wood to Ramsgate via</td>
<td>• Changes to timetable may affect some work commitments</td>
<td>• Increased awareness of revised Arriva commercial timetables</td>
<td>16</td>
<td>16</td>
<td>18,630</td>
<td>1</td>
<td>100%</td>
<td>100%</td>
<td>0%</td>
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<tr>
<td></td>
<td>Tonbridge and Tunbridge Wells</td>
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<td>Estimated journeys per annum</td>
<td>Responses</td>
<td>Elderly (%)</td>
<td>Disabled (%)</td>
<td>Carer (%)</td>
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| 477        | Swanley to Dartford  | • Loss of some evening journeys may restrict ability to attend hospital appointments or visit family/friends in hospital, particularly with the loss of the connection between Orpington and Swanley.  
• Difficulty accessing leisure opportunities in Bluewater.  
• Loss of Orpington to Swanley link will restrict the ability to meet with friends and family but also employment opportunities. | • Review of revised operation with Arriva to understand if particular journey needs can be accommodated and review the reliability | 16       | 18                 | 19,305                       | 16       | 19%         | 25%         | 19%       |
| 14A        | Canterbury to Deal   | • Service important to young people travelling home from socialising in Canterbury.  
• Service needs to coincide with performances at Marlowe Theatre.  
• Loss of train connections for commuters | • Increase awareness of revised timetable and replacement 22.35 journey  
• Further discussion with Stagecoach to look at timing of replacement journey | 14       | 17                 | 10,709                       | 26       | 42%         | 19%         | 12%       |
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</thead>
<tbody>
<tr>
<td>15 / 15A</td>
<td>Dover to Sandown</td>
<td>• Loss of service for workers returning home particularly to Sandown</td>
<td>• There are no mitigating measures other than further discussion with Stagecoach around evening provision and journeys to Sandown.</td>
<td>14</td>
<td>18</td>
<td>8,031</td>
<td>9</td>
<td>22%</td>
<td>11%</td>
<td>11%</td>
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<td></td>
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<td>• Concern for passenger without cars who will not be able to travel late afternoon/evening</td>
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<td></td>
<td>• Loss of service for workers and those attending college</td>
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<td>Concern around wider implication for sustainability of the service and the environment.</td>
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<td>3 / 3B</td>
<td>Canterbury to Faversham</td>
<td>• Potential impact on tourism</td>
<td>• Some passenger would be able to use rail services from Canterbury East</td>
<td>14</td>
<td>17</td>
<td>18,539</td>
<td>21</td>
<td>33%</td>
<td>14%</td>
<td>14%</td>
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<td></td>
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<td>• Important for those attending courses at university or evening classes</td>
<td>• Further discussion with Stagecoach to look at potential for later commercial journeys</td>
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<td></td>
<td>• Loss of service will make it difficult to attend social/entertainment events</td>
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<td></td>
<td></td>
<td>• Increase in travel costs</td>
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<td></td>
<td></td>
<td>• Loss of service for workers</td>
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| 541 / 542 / 544 | Elvington to Dover, Walmer to Sandwich, Walmer to Canterbury | • Loss of service would affect independence of users  
• Important social role played by the service itself. Sense of community on the service providing only access to human interaction for some passengers  
• Most passengers unable to drive, therefore lack of alternative travel options providing access to medical appointments, food shopping and social activities. | • Proposed changes deferred pending the development of further mitigation. |

<table>
<thead>
<tr>
<th>Initial Score</th>
<th>Updated Impact Score</th>
<th>Estimated journeys per annum</th>
<th>Responses</th>
<th>Elderly (%)</th>
<th>Disabled (%)</th>
<th>Carer (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>17</td>
<td>17</td>
<td>6,651</td>
<td>30</td>
<td>63%</td>
<td>33%</td>
<td>23%</td>
</tr>
</tbody>
</table>