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 Subsidy Reduction : : implications for service 541/542/544

What is being assessed?

This EqIA relates to the proposed rationalisation and reduction in service of KCC subsidised bus services 541/542/544. The service currently provides journeys to Dover, Deal, Sandwich and Canterbury from various villages outside Dover operating on Mondays to Saturdays. The change is one of a range of measures proposed by the Council in order to materialise a budget saving of £500k. This EqIA should be read in conjunction with that completed with respect to the wider approach to making the savings.

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 of May 2016

Informed by;
Full Public Consultation: 21st March to 15th May
On bus inspections: ongoing
Operator, passenger and wider 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 Benjamin</td>
<td>22/06/2015</td>
<td>Initial screening.</td>
</tr>
<tr>
<td>2</td>
<td>Clive Lever</td>
<td>04/08/2015</td>
<td>E&amp;D team comments</td>
</tr>
<tr>
<td>3</td>
<td>Steve Pay</td>
<td>21/10/2015</td>
<td>Amended to reflect E&amp;D comments</td>
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<td>4</td>
<td>Steve Pay</td>
<td>04/11/2015</td>
<td>Amended to reflect further E&amp;D comments</td>
</tr>
<tr>
<td>5</td>
<td>Steve Pay</td>
<td>17/11/2015</td>
<td>Amended to reflect further E&amp;D comments</td>
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<tr>
<td>6</td>
<td>Steve Pay</td>
<td>07/01/2016</td>
<td>Amendments following further review.</td>
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</table>

Updated 17/03/2016
### Screening Grid

| Characteristic | 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? | Assessment of potential impact | Provide details:  
a) Is internal action required? If yes what?  
b) Is further assessment required? If yes, why? | Internal action must be included in Action Plan | Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities |
|----------------|-------------------------------------------------------------------------------------------------|-------------------------------|------------------------------------------------|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| **Age**        | Yes                                                                                             | None                          | High                                          | 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.  
Initially, it has been identified that service 541/542/544 is used by older persons travelling with an English National Concessionary Travel Scheme Pass and this will contribute to the impact score which is to be used to assess services for change or protection.  
The on-going process towards final assessment will specifically seek to identify if there are particular users within this group who are more acutely affected by changes to this service.  
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 it is appropriate and possible, the Council will also look to identify alternative transport provision from within the voluntary sector such as local car schemes. | Yes. The approach being adopted by the Council to rationalise the network, will give priority weighting to services identified as carrying passengers of this characteristic. |

**Disability**

| 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? | Assessment of potential impact | Provide details:  
a) Is internal action required? If yes what?  
b) Is further assessment required? If yes, why? | Internal action must be included in Action Plan | Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities |
|-------------------------------------------------|-------------------------------|------------------------------------------------|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Yes                                             | None                          | High                                          | It has been identified that this group is potentially more reliant on the public transport network than other protected groups of members of the wider public.  
Yes. The approach being adopted by the Council to rationalise the network, will give priority weighting to services identified as carrying passengers of this characteristic. | Yes. The approach being adopted by the Council to rationalise the network, will give priority weighting to services identified as carrying passengers of this characteristic. |
Initially, it has been identified that service 541/542/544 is used by persons with a disability and this will contribute to the impact score which is to be used to assess services for change or protection.

The on-going process towards final assessment will specifically seek to identify this user group and where identified will give a weighting to the assessment process that might in turn protect particular services and this user group.

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.

carrying passengers of this characteristic.

<table>
<thead>
<tr>
<th></th>
<th>Gender</th>
<th>Race</th>
<th>Religion or belief</th>
<th>Sexual orientation</th>
<th>Pregnancy and maternity</th>
</tr>
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<tbody>
<tr>
<td>Gender identity</td>
<td>No</td>
<td>No</td>
<td>No</td>
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<tr>
<td>Race</td>
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<td></td>
<td>No</td>
<td>No</td>
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<td>Religion or belief</td>
<td>No</td>
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<tr>
<td>Pregnancy and maternity</td>
<td>No</td>
<td></td>
<td>No</td>
<td>No</td>
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<tr>
<td>Marriage and Civil Partnerships</td>
<td>No</td>
<td></td>
<td>It is not considered that the withdrawal of a bus service has any greater impact on this group than it does on more general members of the public.</td>
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<tr>
<td>Carer's responsibilities</td>
<td>Yes</td>
<td>None</td>
<td>Low</td>
<td>The Council is mindful of the relationship between disabled persons and their carers who in many instances, can travel free of charge using a companion pass issued as part of the English National Concessionary Travel scheme.</td>
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<td>It has initially been identified that service 541/542/544 is used by a carer and this will contribute to the impact score which is to be used to assess services for change or protection.</td>
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<td></td>
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<td></td>
<td>Yes. The approach being adopted by the Council to rationalise the network, will give priority weighting to services identified as carrying passengers of this characteristic.</td>
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Part 1: INITIAL SCREENING

Approach

Based on the scoring system identified in the overarching EqIA, every service has initially been identified as carrying a 'medium' rating against the standard EqIA Impact 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.

Process

It has been determined that of groups that are identified as ‘protected’ within EqIA legislation, older persons, the disabled and carers are potentially more disadvantaged by the withdrawal 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 the only means of accessing education, employment, healthcare or essential food shopping then a further 1 Impact point will be added in each instance.

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 a service 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 to the standard score of 12 that has been identified.

The final impact scores for each service will be used to identify the changes that will have the most detrimental impact on service users, particularly those from an identified group. In these instances, we will consider our ability to develop alternative transport services or protect the service from change and materialise the saving in a different way.
Wider context

Over the past five years the pressure on local authority budgets has increased, as central government have reduced their funding to local authorities by over 40%. KCC has not been immune from these budget reductions and over the same period KCC has reduced expenditure by over £350M. Over the course of 2015-2017 the Council has to find further savings of over £100M.

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 £1.75m from April 2014 to April 2016. To date, over £1.25m 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 the further £500k saving, the existing subsidised network is going to have to be rationalised and in some instances services will need to be reduced and some journeys will be withdrawn completely.

Service 541/542/544 provides journeys to Deal, Dover, Sandwich and Canterbury from rural villages outside Dover. The majority of passengers are most likely to be older persons, using the service to access shopping and health care.

Aims and Objectives

To contribute to the overall saving requirement of £500k, the contract for service 541/542/544 has been identified for potential withdrawal of subsidy.

Service 541/542/544 currently provides the only service to a number of rural villages to their nearest town. The intention in this instance is to reduce the number of days that the service operates while maintaining journeys to key towns such as Dover, Deal, Sandwich and Canterbury as per the table in the consultation document. The overall saving identified by this measure is estimated as £20,000 per annum.

However, no final decisions have been made and the intention is to use the consultation process to update this EqIA and apply the scoring matrix identified in the overarching document to inform final outcomes. The reduction or withdrawal of services that have the most detrimental impact on users, particularly when they form part of a protected group or feature as part of the Council’s own criteria for the support of bus services will try to be avoided.

Beneficiaries

Ultimately no existing bus user will be better off as a result of these measures. However, the process adopted will seek to protect users who are most adversely affected by changes or reductions proposed.

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 older persons and the mobility impaired) and
June 2015

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 2016 and will invite information from users about their journey purpose and the impact of the proposed changes.
- Bus operator, passenger and wider community engagement

**Service 541/542/544**

In this instance, service 541/542/544 has been identified as being used by older passengers (travelling on and English National Concessionary Travel Pass) who make up 78% of passenger journeys completed and so an additional 2 points has been added to the risk rating as part of the initial screening.

The table below shows the initial screening score which will be updated throughout the process, informed by; service inspections, public consultation, community and officer engagement.

<table>
<thead>
<tr>
<th>Service 541/542/544</th>
<th>Impact Rating (12 unless unique circumstances are identified)</th>
<th>12</th>
</tr>
</thead>
<tbody>
<tr>
<td>Evidence of Older passengers? (2 points if identified)</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Evidence of Disabled Passengers? (2 points if identified)</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Evidence of Passenger travelling as a ‘Carer’ (1 point if identified)</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Does the service provide the only means of accessing employment for any passenger? (1 point if identified)</td>
<td>0</td>
<td></td>
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<tr>
<td>Does the service provide the only means of accessing education? (1 point if identified)</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Does the service provide the only means of accessing healthcare? (1 point if identified)</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>Does the service provide the only means of accessing essential shopping? (1 point if identified)</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td><strong>TOTAL IMPACT SCORE</strong></td>
<td><strong>17</strong></td>
<td></td>
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</tbody>
</table>

**Involvement and Engagement**

The following parties will be engaged;

- Bus operators
- Bus Users
- User Groups (Age UK, Mobility and Access Groups etc.)
- Wider Public (through full public consultation)
- KCC elected members

**Potential Impact**

**Initial screening (22/06/2015):**

The majority of users would not have an alternative service if journeys were withdrawn on certain days.

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

**Adverse Impact:**
Initial screening: this bus service provides the only public bus service to a number of rural villages outside Dover. Withdrawal of service 541/542/544 on certain days would reduce journey options for existing passengers. The options available are therefore to withdraw service 541/542/544 on certain days or to retain the current service subject to being able to materialise the required savings through other measures identified as having less of an adverse impact.

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: NO
- Option 3 – Full Impact Assessment: YES

**Required as:**
- the potential impact of the savings measures proposed will likely affect a large number of Kent residents
- many 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, community engagement.

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 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. Initially, the Council has identified a range of measures that would exceed the value of the required savings which will enable it to use the process, 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 the inform the final range of measures required to accommodate the reduced budget available.
June 2015

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 and (full) KCC cabinet.

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 for Environment and Transport 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. EqIAs will be 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
### 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>£400k 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.</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>
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<td>Decisions to be made for implementation in the Summer 2016</td>
<td>£400k 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</td>
<td>Approach identified will seek to give greater priority and protection to services</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>£400k per annum if not materialising the measures required.</td>
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<table>
<thead>
<tr>
<th>Operations Manager</th>
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