

## Equality Impact Assessment (EIA)

This document demonstrates how the council is meeting its duties under the Equality Act 2010, by giving due regard to the requirement to: eliminate discrimination; advance equality of opportunity; and promote good relations.

### 1. Background

Directorate	Economy, Environment and Infrastructure
Service area	Integrated Transport Unit
Title of the activity being assessed i.e. the strategy, plan, policy or service	<p style="text-align: center;">Procurement of service/supplier for</p> <p>a) concessionary bus pass (as per the ENCTS<sup>1</sup>) and education bus pass production, management of these cards, and a high-level statistical analysis portal; and</p> <p>b) concessionary fare reimbursement services (calculations and administration). In summary, concessionary fare reimbursement is funded by central government, via local transport authorities (with/without external supplier assistance), where reimbursement is calculated via national regulations and sent to operators for concessionary fares.</p>
Brief outline of the proposal(s)	<p>The ENCTS passes, and the free school bus passes have been produced and managed by GCC and relevant suppliers since 2011 and roughly 2015 respectively. The Council also reimburse concessionary fares to bus operators, as do all Local Transport Authorities. These three projects are all statutory obligations, because the Council is the local transport authority. The bus-pass contract is expiring December 2022 and the reimbursement-administration contract expires March 2023. The proposal is that ITU conduct a procurement exercise to select the most appropriate supplier to continue these requirements.</p> <p>Please note, the rules and regulations of all this travel are predefined<sup>2</sup> and non-negotiable. Thus, the proposed procurement does not involve any of the below, as these are predefined by central government</p> <ul style="list-style-type: none"> <li>a) eligibility of travel</li> <li>b) the rates of travel</li> <li>c) the times of travel</li> <li>d) any negotiation with bus operators on these topics</li> </ul>

<sup>1</sup> <https://www.gov.uk/government/publications/administering-smart-concessionary-travel-permits-english-local-authorities-guidance>

<sup>2</sup> Predefined by the Department for Transport and central government

Who is affected by the proposals?	Service users <input type="checkbox"/> Workforce <input type="checkbox"/> Other, please specify: <input type="text"/>
Decision to be taken and decision maker	<ol style="list-style-type: none"> <li>1. Conduct a compliant procurement process to assign a supplier to undertake the bus pass production and management contract, and concessionary fare reimbursement, on behalf of the Council;</li> <li>2. Award the contract for five years to the most economically advantageous and technically able supplier, with an optional extension of a maximum of two years.</li> </ol>
Person(s) responsible for completing this assessment	Tom Main Thea Powell Orlagh Stoner
Date of this assessment	• Date of cabinet to which this EIA is being submitted: 23 March 2022

## 2. Information Gathering

Briefly outline your approach to consultation and engagement, together with details of any other information and data sources you have utilised:

Research, Consultation and Engagement	
Service users	<p>From the Council's long and in-depth experience in producing and managing these bus passes, consultation and engagement with users has led to the following options...</p> <ol style="list-style-type: none"> <li>1) Users can apply for their own cards online. The portal/pages used for these applications has been and should be created by software companies who use/adhere to government guidelines : <a href="https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag">https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag</a></li> <li>2) Users can apply for a replacement pass online. (This option is for when a pass is lost or stolen. If lost, users can pay a small replacement fee online via card-payment).</li> <li>3) Users can phone Council staff and have assistance over the phone with using the online pages, or indeed Council staff can order a new pass by using the staff log in. (Payments are not taken over the phone).</li> <li>4) Users can visit a library in person, where a library staff member will assist them on a one-on-one basis. This is helpful for disabled-related applications when certain paperwork needs to</li> </ol>

	<p>be seen, and also this means that a card-payment (if needed) can be made in person using a card machine.</p> <p>With all these options available, including the staff interaction being well practised and thus of the highest standard (on the phone and at libraries), and with web-pages being user friendly and accessible, the Council believes we are increasing the positive impacts on equality when fulfilling these statutory requirements for Gloucestershire.</p> <p><u>Background information</u></p> <p>Cabinet (28/09/2016): <a href="#">Tender and Award of Concessionary Travel and Smart Card Production and Management Contract</a></p> <p><a href="#">Proposed Concessionary Travel Scheme Reimbursement Contract (14 December 2016)</a></p> <p><a href="#">Department for Transport: Concessionary travel statistics: quality report 2021</a></p> <p><a href="#">Department for Transport: Evaluation of Concessionary Bus Travel - The impacts of the free bus pass</a></p> <p><a href="#">Department for Transport: Policy paper - Inclusive Transport Strategy</a></p> <p><a href="#">Department for Transport: Policy paper - Post legislative assessment of the Concessionary Bus Travel Act 2007: memorandum to the Transport Select Committee</a></p>
Workforce	<p>ITU is working closely with Commercial Team on this development, and has also liaised with legal services. ITU will make equality-of-access a feature within the procurement, by using the government guidelines for service understanding (i.e. for the webpages for users to be accessible).</p> <p>The Local Transport Plan, led by Transport Planning in the Council, which underwent a thorough EIA, see here: <a href="http://glostext.gloucestershire.gov.uk/uuCoverPage.aspx?bcr=1">http://glostext.gloucestershire.gov.uk/uuCoverPage.aspx?bcr=1</a></p>
Partners	Operators of transport services
Other	External – We will speak to suppliers as part of the tender process

### 3. Equality Assessment

Briefly explain your assessment of the impact of the proposed activity on the protected characteristics below. This section evidences how the council is giving due regard to the three aims of the general equality duty, which are to: eliminate discrimination; advance equality of opportunity; and promote good relations.

Protected Characteristic	Service Users - Challenges and Opportunities	Workforce
All listed / general impact	<p>The Council enable the ENCTS bus passes and Education bus passes to be created and managed, to fill statutory requirements and to enable the following communities to use public transport in the ways which they are entitled to do so</p> <ul style="list-style-type: none"> <li>• ENCTS bus pass – age related</li> <li>• ENCTS bus pass – disability related</li> <li>• Education (home to school) bus pass.</li> </ul> <p>ENCTS Permit design has it's own guidelines:  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501080/encs-technical-guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501080/encs-technical-guidance.pdf</a></p> <p>Thus, the Council provide residents, specifically individuals with a disability and the elderly who may not have access to their own private car, with the ticketing option they require – free travel as prescribed by central government.</p> <p>There has been impressive progress with home to school transport from the Council, as Gloucestershire was one of the first counties to introduce these bus-passes which pupils scan on their school buses/minibuses. In 2022, most schools in the county are using these bus passes (which are valid for 5 years to last pupils' duration at school. Cards are encoded with the same pick-up point and school-drop off point).</p> <p>Standards regarding accessibility at bus stops to ease the boarding and alighting of buses is considered by GCC and/or developers when placing and specifying bus stop infrastructure.</p> <p>En route location details are available on mobile apps, and in the future once the service is launched, likely on the Council's Real Time Passenger Information displays.</p>	<i>Workforce would only be impacted when using the services provided.</i>
	The proposed procurement facilitates statutory requirements. These requirements include enabling	<i>Workforce</i>

<p><b>Age</b></p>	<p>travel for eligible school pupils and eligible age-related<sup>3</sup> concessionary bus pass holders. More background is here: <a href="https://www.gov.uk/free-school-transport">https://www.gov.uk/free-school-transport</a> and <a href="https://www.gov.uk/apply-for-elderly-person-bus-pass">https://www.gov.uk/apply-for-elderly-person-bus-pass</a>.</p> <p>Many challenges and increasing levels of negative impact would result from not procuring a contract. By procuring a contract as recommended, opportunities will be available to increase positive impact throughout the contract duration.</p> <p>Gloucestershire's population projections from 2016 to 2041 demonstrate that the proportion of people in the county who are aged 65 or over will have risen from 20.8% to 28.9%.<sup>4</sup> Population Demographics Forecast (2012-2031) reveals an aging demographic profile which indicates an increased demand for particular services and transport provision<sup>5</sup>.</p> <p>Those without the use of a car have more difficulty accessing some destinations such as retail developments, health and education facilities and opportunities for recreation - this includes a higher proportion of younger and older people. The 2011 Census indicated that 17% of Gloucestershire households are without the use of a car. Certain groups, such as older people, are more likely to fall within this category.</p> <p>It should be noted that the greatest increase in population overall will be in the Joint Core Strategy delivery area – comprising Gloucester, Cheltenham and Tewkesbury where the need for access to services by users who are aged and more likely to need health services and not have access to a car.</p> <p>The other significant age group is children and young people. A particular social group for which access to training and education is vital are young people who are not in education, employment or training (NEETs)<sup>6</sup>. In 2016, 7.4% of Gloucestershire's 16-17 year old population were classed as NEETs or whose activity is not known (current method 2016). This group is particularly vulnerable to transport related barriers to education and training given relatively low levels of car</p>	<p><i>would only be impacted when using the services provided.</i></p>
-------------------	---	--

<sup>3</sup> People of pensionable age: You qualify for a concessionary bus pass when you reach the pensionable age applicable to a woman, irrespective of whether you are male or female

<sup>4</sup> [https://inform.gloucestershire.gov.uk/media/2082298/overview\\_-\\_population\\_projections\\_for\\_gloucestershire\\_2016-41-2.pdf](https://inform.gloucestershire.gov.uk/media/2082298/overview_-_population_projections_for_gloucestershire_2016-41-2.pdf)

<sup>5</sup> [Census 2011](#)

<sup>6</sup> [Children and Young People and Families Needs Assessment 2018-2.pdf](#)

ownership.

Based on the LTP Consultation (2020) of 1,340 themed comments, the largest proportion were **Public Transport Improvements (14.6%)** followed by:

- Cycle Improvements (14.2%)
- Rail Improvements (11.9%)
- Climate Change/Environment (9.9%)
- Document specific (9.0%)

**Table 1** provides a breakdown by age of LTP responses against the Gloucestershire population to set the context for feedback on Public Transport improvements.

<b>Table 1 - Demographic Breakdown</b> (LTP Consultation (2020))		
<b>Gender</b>	<b>LTP Response</b>	<b>Glos Population*</b>
Male	47.63%	49.04%
Female	43.79%	50.96%
Preferred not to state	8.28%	
<b>Age</b>		
Aged 16-24yrs	7.98%	10.50%
Aged 25-29yrs	3.55%	5.48%
Aged 30-34yrs	4.14%	5.75%
Aged 35-39yrs	4.73%	5.89%
Aged 40-44yrs	4.73%	5.75%
Aged 45-49yrs	9.47%	6.59%
Aged 50-54yrs	11.54%	7.37%
Aged 55-59yrs	7.99%	7.31%
Aged 60-64yrs	13.91%	6.37%
Aged 65yrs+	11.54%	21.90%
Preferred not to state	9.76%	
<b>Disability</b>		
Disability – yes	12.72%	16.73%**
Disability – no	76.92%	
Preferred not to say	9.47%	
<b>Ethnicity</b>		
Ethnicity – white	88.17%	91.6%**
Ethnicity – other	0.30%	4.6%**

	Preferred not to say	10.95%		
<b>Disability</b>	<p>*Inform Gloucestershire (2020)</p> <p>**Inform Gloucestershire – based on census data for long-term disability/race</p> <p>The proposed procurement facilitates statutory requirements. These requirements include enabling travel for eligible school pupils, who may be disabled, and eligible disable-related<sup>7</sup> concessionary bus pass holders. More background is here: <a href="https://www.gov.uk/free-school-transport">https://www.gov.uk/free-school-transport</a> and <a href="https://www.gov.uk/apply-for-disabled-bus-pass">https://www.gov.uk/apply-for-disabled-bus-pass</a> . Many challenges and increasing levels of negative impact would result from not procuring a contract. By procuring a contract as recommended, opportunities will be available to increase positive impact throughout the contract duration.</p> <p>It is recognised that the term disability is a broad one and includes people with physical, sensory, or cognitive impairments. Many people with disabilities have mobility impairments, and some are wheelchair users. Disability can affect locomotion, seeing, hearing, reaching, stretching, dexterity, and cognitive functions, but these categories are not exhaustive, or mutually exclusive; many disabled people, particularly older people, may have two or more impairment.</p> <p>The ENCTS run by the Council follows the statutory requirement as per the DfT rules and regulations.</p> <p>The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.</p> <p>Over 40,000 households in Gloucestershire are without a car or van to enable them to access essential services. These tend to be households where one or more members have a disability. Access to transport is a key determinant of levels of social inclusion of people in society. This is why issues such as the management of bus service provision effectively is essential to keep communities joined up to local essential services.</p> <p>In addition to that, accessing transport, whatever the mode, can be affected or hampered through disability.</p>			<p><i>Workforce would only be impacted when using the services provided.</i></p>

<sup>7</sup> People of pensionable age: You qualify for a concessionary bus pass when you reach the pensionable age applicable to a woman, irrespective of whether you are male or female

Learning disability is one of the most common forms of disability in the UK. There are approximately 11,913 people aged 18+ living with a learning disability in Gloucestershire in 2020. Of this group, an estimated 2,437 people are predicted to have moderate or severe learning disabilities, equating to 0.5% of the adult population. In 2017/18 Gloucestershire GPs recorded that 0.6% of their registered patients (of all ages) were known to have a learning disability. Evidence shows that people with learning disabilities have poorer health than the general population, much of which is avoidable, and that the impact of these health inequalities is serious; people with learning disabilities are three times as likely as people in the general population to have a death classified as potentially avoidable through the provision of good quality healthcare.

Some people with physical or learning disabilities may have limited awareness of the travel options available to them not knowing how to access travel/journey information or be able to read and understand it. The National Star Centre partner with other organisations in Gloucestershire and beyond to provide specialist travel training – Learning Independence for Travel (LIFT) - <https://www.nationalstar.org/learning-programmes/prospectus/lift-training/>

Vision and hearing impairments affect people from all sections of society and across all age groups. In 2018 approximately 1.6% of the 16+ population in Gloucestershire reported blindness or partial sight. During the same period 7.0% of the population aged 16+ reported deafness or hearing loss. As people get older they become increasingly likely to suffer from hearing and vision impairments; given the ageing population this means the number of people affected by these conditions is likely to increase in the future. GCC continues to have positive working relationship with representative disability groups and organisations such as Royal National Institute of the Blind and local representatives through the Physical Disability & Sensory Impairment Partnership Board, to hear their representative views. GCC will maintain the phased introduction of Real Time Passenger Information display system which provides expected arrival time and destination, improving the quality of information provided at passenger waiting facilities. Real time displays will be



	<p>prioritised for stops in market towns and interchange Hubs.</p> <p>The Bus Strategy Enhanced Partnership will set out expected enhancements to bus services/ticketing e.g. enhanced use of mobile apps to obtain bus information, which may be more frequently used by younger people, e.g. students and contactless technology. Nationally, there is a drive by the Department for Transport for all public bus services to be upgraded to include audio and visual announcements to passengers, such as next stop announcements. Details have not been finalised however once they are, the Council will be working with all operators to ensure they comply with any new legislation or best practice guidance.</p> <p>Lack of suitable pedestrian facilities (e.g. tactile paving, crossing points, etc.) can restrict accessibility and movement for people with mobility impairments accessing the wider transport network including public transport. Inclusive design and layout of streets for all users is an important aspect of transport network. Inclusivity is at the heart of the <a href="#">Local Cycling and Walking Infrastructure Plan</a> (LCWIP), being developed alongside the LTP. The first LCWIP has been developed for the Central Severn Vale area, which includes Cheltenham and Gloucester. This has considered main trip attractors and desire lines, used the Walking Route Audit Tool (WRAT) to assess the current condition and suitability of the routes. In parallel, an Equalities Assessment Tool (EQAT) assessed routes in terms of their impacts on different groups.</p> <p>Dementia is one of the major causes of disability in older people. Estimates suggest that in 2020 there are predicted to be around 9,911 people aged 65+ living with dementia in Gloucestershire. Incidents of dementia increase with age, people aged 65-69 account for 6.1% of dementia sufferers over 65 in Gloucestershire; this increases to 21.8% for the age group, 85-89. Given the ageing population the number of dementia sufferers will increase in the future.</p> <p>GCC supports disability awareness training and specialist dementia training for all commercial, community and voluntary drivers.</p>	
<b>Sex</b>	National statistics show that women are more	<i>Workforce</i>

	<p>dependent on public transport than men (particularly at an older age). The council's policy and the national legal requirements in place to ensure equality and inclusion, means that this provision demonstrates due regard to the equalities act. The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.</p> <p>When considering a representative view of Gloucestershire population on issues relating to transport, the LTP Consultation (2020) reached the gender demographic in line with the county population, the survey responses were received were 47.63% of males and 43.79% of females, a further 8.28% preferred not to state.</p>	<p><i>would only be impacted when using the services provided.</i></p>
<p><b>Race (including Gypsy &amp; Traveller)</b></p>	<p>Black and Minority Ethnic (BAME) groups seem to have a higher representation in Gloucester and Cheltenham. There is a higher percentage of BAME in the more deprived wards, such as Barton Tredworth, which may be more affected by the impacts of transport (traffic) on their daily lives, such as air quality. Therefore, traffic management, support for ultra-low emission vehicles and tools to reduce the traffic impacts in Air Quality Management Areas (AQMAs) may positively assist ethnic and BAME groups.</p> <p>Black African/Caribbean/Black British in Gloucestershire represent 27.6% in comparison to 11.1% of White British people living in a household with no access to a car or van. Therefore, the BAME community are more reliant on public transport to access education, employment and services.<sup>8</sup></p> <p>Overall 0.3% of all stakeholders who submitted online feedback identified as BAME, compared to 4.6% of all Gloucestershire residents (according to the 2011 census). However, people identifying as White British or Other White were also under represented. This is likely due to the high number of people who preferred not to state their ethnicity (10.95%).</p>	<p><i>Workforce would only be impacted when using the services provided.</i></p>
<p><b>Gender reassignment</b></p>	<p>The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.</p>	<p><i>Workforce</i></p>

<b>Marriage &amp; civil partnership</b>	The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.	<i>would only be impacted when using the services provided.</i>
<b>Pregnancy &amp; Maternity</b>	Accessible environments can be assessed in terms of their 'friendliness' towards pregnant and nursing mothers and parents/guardians with young children. This may indicate a need for facilities for transporting baby buggies on buses. The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.	
<b>Religion and/or Belief</b>	The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.	
<b>Sexual Orientation</b>	The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.	

#### 4. Completed Actions

Set out how the proposed activity has already been amended following the equality assessment, to maximise the positive impact or minimise the negative impact:

Change	Reason for Change
<p>Potential to support through the delivery of statutory bus passes:</p> <ul style="list-style-type: none"> <li>(i) Continue over-the-phone and face-to-face library services.</li> <li>(ii) Continue over-the-phone call backs and "case management" by a single member of GCC staff, when bus pass holders need additional support and information, at any time Mon-Fri 9am to 5pm.</li> </ul>	<p>We receive good feedback on continuing these one-to-one conversations and allowing staff to develop a short, productive relationship with those who need this support. The personability involved minimise the negative impact to a more remote approach, where the public would not be in touch with a staff member directly.</p>
<p>Coding on school bus passes</p>	<p>The coding for school bus passes has been tested and refined, and encountered different obstacles over the years the passes have been in production. These obstacles have all been overcome but various coding changes/data cleansing work, but the resulting system works well. The lessons learned from this progress will help communication with the new supplier understand the background to the</p>

<sup>8</sup> <https://inform.gloucestershire.gov.uk/media/2105981/equality-profile-2021.pdf>

	new contract.
--	---------------

## 5. Planned Actions

Set out improvements that will be undertaken, following the equality assessment, to further maximise the positive impact or minimise the negative impact:

Potential impact (positive or negative)	Action	By when	Owner
To maximise the positive impact	To ensure the new contract includes the compulsory functionality: the public will have access to an online portal to apply for either age or disability related concessionary bus passes. The Council are aware that this functionality already works well within the market. Within the current contract, the online portal for the public only allows age related concessionary bus passes. The advancement in the market allows us to make this development a requirement in the new contract.	February 2023	Tom Main Thea Powell
Both to maximise the positive impact and minimise the negative impact	Ensure equality of use of webpages and of the bus passes are included in procurement by making use of guidelines mandatory:  <a href="https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag">https://www.gov.uk/service-manual/helping-people-to-use-your-service/understanding-wcag</a>  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501080/encts-technical-guidance.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/501080/encts-technical-guidance.pdf</a>	Ongoing	Tom Main Thea Powell Chris Keenleyside
Both to maximise the positive impact and minimise the negative impact	Continue over-the-phone and face-to-face library services. Continue over-the-phone call backs and “case management” by a single member of GCC staff, when bus pass holders need additional support and information, at any time Mon-Fri 9am to 5pm.	Ongoing	GCC ENCTS staff


## 6. Monitoring and review

The following processes/actions will be put in place to keep this 'activity' under review:


Standard contract procurement , evaluation and award reviews.

## 7. Officer / Decision-maker Sign off

Officer: By signing this statement off as complete you are confirming that 'you' have examined sufficient information across all the protected characteristics and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity

Signature of Senior Officer	
Name of Senior Officer	Jason Humm
Date	15.03.2022

Decision maker: I am in agreement that sufficient information and analysis has been used to inform the development of this 'activity' and that any proposed improvement actions are appropriate and I confirm that I, as the decision maker, have been able to show due regard to the needs set out in section 149 of the Equality Act 2010.

Signature of decision maker	
Name of decision maker	Councillor Philip Robinson
Date	17.03.2022

## 8. Publication

If this document accompanies a Cabinet report or an Individual Cabinet Member (ICM) decision report it will be published, as part of the report publication process, on the GCC website. If this statement is not to be submitted with a Cabinet report or an Individual Cabinet Member (ICM) decision report, please maintain a copy for your own records that can be retrieved for internal review and also in case of future challenge.

## Appendix 1 – Service User Data

Details of service users affected by the proposed activity

Protected Characteristic	Service User Data and Information
Age <i>percentage/profile of service user ages</i>	National results including protected characteristics available from: <a href="https://nhtnetwork.org/authority-participation/">https://nhtnetwork.org/authority-participation/</a> - Please see Public satisfaction survey.
Disability <i>percentage/profile of service users who have a disability</i>	As above
Sex <i>percentage/profile of service users who are male and who are female</i>	As above
Race <i>percentage/profile of service users who are from black and minority ethnic backgrounds</i>	As above
Gender reassignment <i>percentage/profile of service users who have indicated they are transgender</i>	As above
Marriage & civil partnership <i>percentage/profile of service users who are married or in a civil partnership</i>	As above
Pregnancy & maternity <i>percentage/profile of service users who are female and who are pregnant or on a maternity leave</i>	As above
Religion and/or belief <i>percentage/profile of service users religious beliefs</i>	As above
Sexual orientation <i>percentage/profile of service</i>	As above

<i>users who are lesbian, gay, bisexual, heterosexual</i>	
---	--



## Appendix 2 – GCC Workforce Data

Details of Gloucestershire County Council staff affected by the proposed activity

Protected Characteristic	Total number of GCC staff affected:
Age	In line with <a href="#">2021 Workforce Equality &amp; Diversity and Inclusion Report</a>
Disability	As above
Sex	As above
Race	As above
Gender reassignment	As above
Marriage & civil partnership	As above
Pregnancy & maternity	As above
Religion and/or belief	As above
Sexual orientation	As above

---