

## 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	Bus Strategy - Enhanced Partnership
Brief outline of the proposal(s)	The Enhanced Partnership (EP) summarises the main themes of the Bus Service Improvement Plan (BSIP) in setting out an analysis of local bus services in Gloucestershire, the objectives for the quality and effectiveness of bus services and how the EP Scheme or Schemes are intended to achieve these objectives.
Who is affected by the proposals?	Service users <input checked="" type="checkbox"/> Workforce <input type="checkbox"/> Other, please specify: <input type="text"/>
Decision to be taken and decision maker	To delegate authority to the Executive Director of Economy, Environment and Infrastructure to: <ul style="list-style-type: none"> <li>(a) further develop and finalise the Enhanced Partnership in consultation with the Cabinet Member for Economy, Education and Skills</li> <li>(b) submit a draft Enhanced Partnership document to the Department for Transport (DfT) by 30/04/22, and subsequently submit the agreed final document by a date yet to be advised, and</li> <li>(c) enter into the Enhanced Partnership agreement with transport operators later in the year once the date for final EP submission referred to in (b) is confirmed by the DfT.</li> </ul>
Person(s) responsible for completing this assessment	Tom Main Thea Powell
Date of this assessment	• Date of cabinet to which this EIA is being submitted: 30 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>Bus Back Better Strategy – early engagement with transport operators  <a href="https://glostext.gloucestershire.gov.uk/documents/s74785/BSIP%202021%20Cabinet%20Report%20FINAL.pdf">https://glostext.gloucestershire.gov.uk/documents/s74785/BSIP%202021%20Cabinet%20Report%20FINAL.pdf</a></p> <p>Bus Service Improvement Plan – initial engagement  <a href="https://www.gloucestershire.gov.uk/gloucestershire-county-council-news/news-september-2021/have-your-say-on-county-buses/">https://www.gloucestershire.gov.uk/gloucestershire-county-council-news/news-september-2021/have-your-say-on-county-buses/</a></p> <p>Bus Strategy Enhanced Partnership - Survey  <a href="https://www.gloucestershire.gov.uk/transport/gloucestershire-bus-strategy/">https://www.gloucestershire.gov.uk/transport/gloucestershire-bus-strategy/</a></p> <p>Gloucestershire Local Transport Plan (2020-2041) Annex 1.0 – LTP Summary Evidence Base:  <a href="https://www.gloucestershire.gov.uk/media/2103390/annex-10-ltp-summary-evidence-base-final-v10.pdf">https://www.gloucestershire.gov.uk/media/2103390/annex-10-ltp-summary-evidence-base-final-v10.pdf</a></p>
Workforce	<p>ITU worked closely with the Commercial Team on this development, and also liaised with legal services where required</p> <p>The Local Transport Plan, led by Transport Planning in GCC, 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 details 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	There is no direct impact on persons with protected characteristics from following DfT statutory guidance by agreeing an EP with bus operators and launching the EP. A	<i>Workforce would only be impacted</i>

	<p>functional EP will allow the future impact of bus use on all protected characteristics to be addressed in a more appropriate and more comprehensive manner than is currently possible (by working with bus operators more closely and the existence of an EP Board).</p> <p>Setting the EP aside, to understand the impact of bus use in general on protected characteristics, please see Appendix 3.</p>	<i>when using the services provided.</i>
<b>Age</b>	<i>As above</i>	
<b>Disability</b>	<i>As above</i>	
<b>Sex</b>	<i>As above</i>	
<b>Race (including Gypsy &amp; Traveller)</b>	<i>As above</i>	
<b>Gender reassignment</b>	<i>As above</i>	
<b>Marriage &amp; civil partnership</b>	<i>As above</i>	
<b>Pregnancy &amp; Maternity</b>	<i>As above</i>	
<b>Religion and/or Belief</b>	<i>As above</i>	
<b>Sexual Orientation</b>	<i>As above</i>	

#### 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
No change to maximise the positive impact or minimise the negative impact would be applicable to launching the EP. This is because the EP is principally a legal framework between the Council and bus operators.	

## 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:

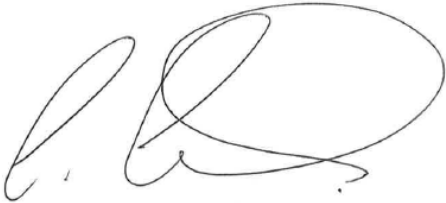
Potential impact (positive or negative)	Action	By when	Owner
Both to maximise the positive impact and minimise the negative impact	Ongoing dialogue with providers/suppliers, including action to fulfil statutory obligations as the transport authority.	Ongoing	Jo Savell and Tom Main
Both to maximise the positive impact and minimise the negative impact	Follow the Bus Strategy Enhanced Partnership	Ongoing	All groups named in strategy and individuals therein

## 6. Monitoring and review


The following processes/actions will be put in place to keep this 'activity' under review:
<p>There is every reason to expect a functional EP will be able to address (and reduce) impacts on equalities of using the bus network in Gloucestershire.</p> <p>Therefore, if the EP is <b>not</b> launched on time/not launched at all, ITU will have responsibility to action the below list...</p> <ul style="list-style-type: none"> <li>• ITU to understand the exact process that led to a delayed/cancelled EP</li> <li>• ITU to understand the exact reasoning that led to a delayed/cancelled EP</li> <li>• ITU to mitigate any delay/cancellation with the DfT, although mitigation is likely to be problematic/not possible due to DfT guidelines and current legislation</li> </ul>

## 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	Colin Chick
Date	04.03.2022

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	Cllr Philip Robinson
Date	17.03.2021

## 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	As above

<i>percentage/profile of service users religious beliefs</i>	
<i>Sexual orientation percentage/profile of service users who are lesbian, gay, bisexual, heterosexual</i>	As above

## 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

## Appendix 3 - Equality Assessment of bus use in Gloucestershire

Protected Characteristic	Service Users - Challenges and Opportunities	Workforce
All listed / general impact	The DPS2 enables GCC to procure transport to compliment the commercial network and effectively and successfully fill the gaps in the network. GCC also allocates grant funds to support operators of Community Transport; one of the aims of this sector is to provide transport to those who cannot access the standard bus service network. Thus, GCC provide residents, specifically individuals with a disability and the elderly who may not have access to their own private car, with further improved public transport provision enabling access employment, services and facilities. This promotes social	<i>Workforce would only be impacted when using the services provided.</i>



	<p>inclusion, improve health (e.g. walking to and from a bus stop), tackle loneliness which can result in reduced feelings of isolation that may impact their mental health.</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>Route location details are available on mobile apps, and also via GCC's Real Time Passenger Information displays.</p>	
Age	<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>1</sup> Population Demographics Forecast (2012-2031) reveals an aging demographic profile which indicates an increased demand for particular services and transport provision<sup>2</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>3</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 ownership.</p> <p>Based on the LTP Consultation (2020) of 1,340 themed comments, the largest proportion were <b>Public Transport Improvements (14.6%)</b> followed by:</p> <ul style="list-style-type: none"> <li>• Cycle Improvements (14.2%)</li> </ul>	<p><i>Workforce would only be impacted when using the services provided.</i></p>

<sup>1</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>2</sup> [Census 2011](#)

<sup>3</sup> [Children and Young People and Families Needs Assessment 2018-2.pdf](#)

- 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%	

\*Inform Gloucestershire (2020)

\*\*Inform Gloucestershire – based on census data for long-term disability/race

**Disability**

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

*Workforce would only be impacted when using*

	<p>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>Potential to support through the delivery of bus services:</p> <ul style="list-style-type: none"> <li>(i) Accessibility enhancements at some bus stops to ease the boarding and alighting of buses.</li> <li>(ii) The DPS2 scoring framework prioritises the provision of bus priority measures to reduce journey times and enhance schedule adherence.</li> </ul> <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. 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.</p> <p>GCC provides £0.5 million per year in annual grants to support community transport providers, as this is often the last line of access to public transport for vulnerable people. There may be opportunities to protect and enhance community transport through a Total Transport approach. This would draw together the resources deployed on various types of specialist provision, including non-emergency patient transport and school transport<sup>47</sup>. Such integration will provide economies of scale by linking together different passenger demands and</p>	<p><i>the services provided.</i></p>
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increasing utilisation of existing vehicles. GCC is progressing this idea through the Thinktravel 'Total Transport' portal which will bring community, voluntary and public transport together under one platform, making accessible transport available to a wider audience, that previously have not considered these options as a travel choice. This could include better integration of the funding and delivery of patient care transport, demand responsive community transport services and car or lift-share schemes. There is a need to clarify the training and permit requirements for those providing shared services.

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 prioritised for stops in market towns and interchange Hubs.

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 we will be working with all operators to ensure they comply with any new legislation or best practice guidance. This may also include a

	<p>review of bus stops and how any barriers to accessibility can be removed.</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 <u>Local Cycling and Walking Infrastructure Plan (LCWIP)</u>, 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>	
<p><b>Sex</b></p>	<p>National statistics show that women are more dependent on public transport than men (particularly at an older age). The manner in which the DPS2 procurement evaluates bids from transport operators, 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>Workforce 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>4</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><b>Marriage &amp; civil partnership</b></p>	<p>The Bus Strategy Enhanced Partnership is being developed with all protected characteristic groups considered within the Equality Act 2010.</p>	
<p><b>Pregnancy &amp; Maternity</b></p>	<p>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.</p>	<p><i>Workforce would only be impacted when using the services provided.</i></p>

<sup>4</sup> <https://inform.gloucestershire.gov.uk/media/2105981/equality-profile-2021.pdf>

<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.	

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