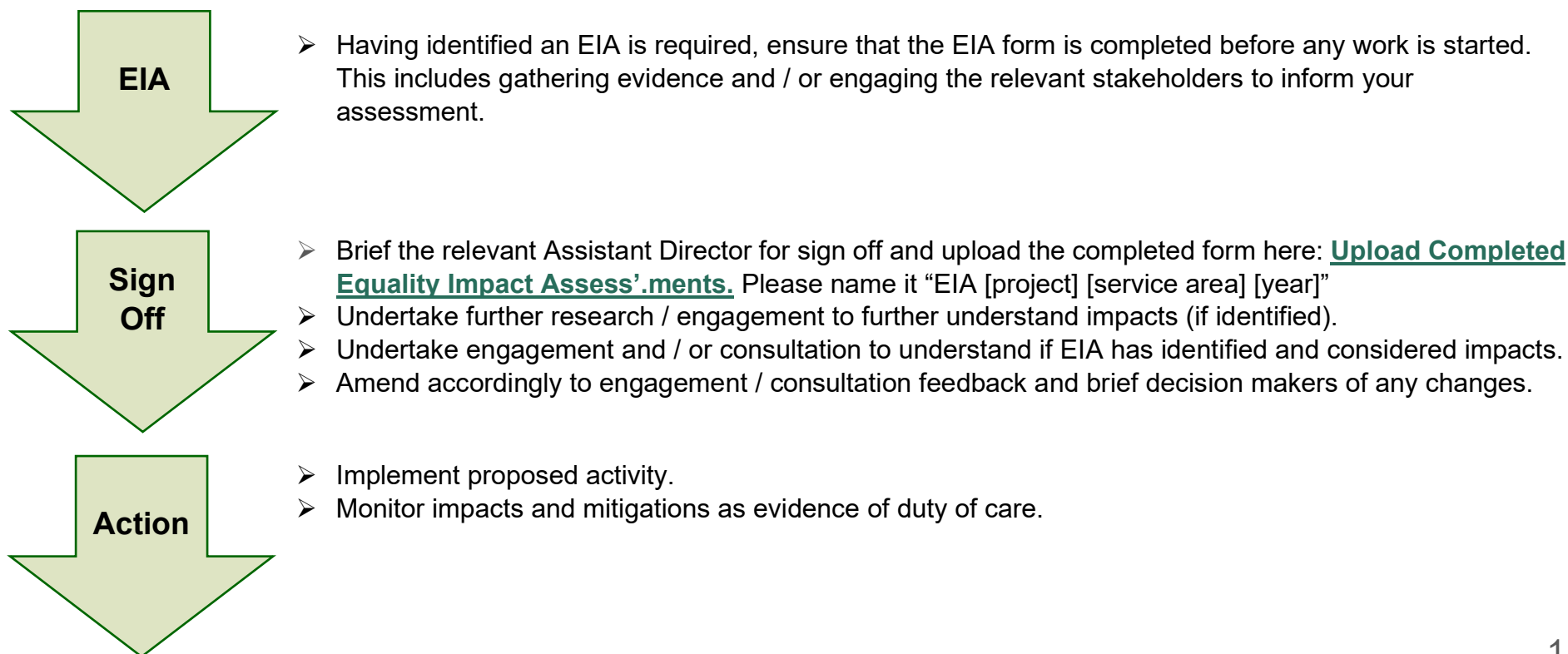


## Warwickshire County Council (WCC) Equality Impact Assessment (EIA) Form

The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

This document is a planning tool, designed to help you improve programmes of work by considering the implications for different groups of people. A guidance document is available [here](#).

Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team via [equalities@warwickshire.gov.uk](mailto:equalities@warwickshire.gov.uk), or if it's relating to health inequalities, please contact Public Health via [padmin@warwickshire.gov.uk](mailto:padmin@warwickshire.gov.uk).



## Section One: Essential Information

<b>Service / policy / strategy / practice / plan being assessed</b>	Companion enhancement to the ENCTS Concessionary Travel Scheme in Warwickshire
<b>Business Unit / Service Area</b>	Transport Delivery/Concessionary Travel
<b>Is this a new or existing service / policy / strategy / practice / plan?</b>  If existing, please state date of last assessment.	This would be a continuation to an existing service.  Last EqIA was in July 2023
<b>EIA Authors</b>  <b>N.B.</b> It is best practice to have more than one person complete the EIA to bring different perspectives to the table.	Jo Cooper
<b>Do any other Business Units / Service Areas need to be included?</b>	No
<b>Does this EIA contain personal and / or sensitive information?</b>	No
<b>Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?</b>	No

**1. Please explain the background to your proposed activity and the reasons for it.**

The concessionary travel scheme was reviewed in 2022 and over 74% of respondents were in favour of the introduction of free travel for a carer or companion accompanying a passholder who cannot travel alone (subject to eligibility criteria). A feasibility study was undertaken and, in July 2023, Cabinet approved a companion enhancement for a fixed term ending on 31 March 2025.

The scheme has now been reviewed and a further report is being taken to Cabinet prior to the end of that fixed term, in line with the action plan in the previous EqIA.

**2. Please outline your proposed activity including a summary of the main actions.**

An added discretionary benefit would continue to be available for some passholders with disabilities which would allow a carer or companion to travel free of charge on buses when accompanying a passholder who is using their pass.

**3. Who is this going to impact and how?**

<b>Customers</b>	<b>Members of the Public</b>	<b>Employees</b>	<b>Job Applicants</b>
This will affect some holders of concessionary bus passes	No impact for members of the public who are not passholders	No impact	No impact
<b>Other, please specify:</b>			

**Section Two: Evidence**  
 Please include any evidence or relevant information that has influenced the decisions contained in this EIA. This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups and additional groups outlined in Section Four.

### **A – Quantitative Evidence**

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

As of 30 November 2024 there were 84,413 passholders in Warwickshire, of which 80,903 held Older Person's passes (OPP) and 3510 held Disabled Person's Passes (DPP).

Of these passholders, there were 24 older person's pass holders with the Companion (+1) add-on, and 152 disabled person's pass holders with the add-on. This is after the first eleven months of the trial

Research from our consultants indicates that in other authorities the proportion of people who qualify for a companion enhancement range from 1.3% to 7% of all passholders. The difference is accounted for by the difference in the criteria used for different authorities as there is no national standard or rules, or even guidance, on who might qualify.

Our original estimates were for between 1,000 and 5,000 people to apply for and qualify for the companion enhancement. The numbers have been significantly lower. There are three possible contributory factors to this:

1. That the WCC reasons for issue a companion (+1) pass are much stricter than other authorities and so fewer people qualify.
2. Older person's pass holders will often have someone a partner or spouse in their household with a pass of their own, so the companion travel is not separately needed.
3. There has been very little publicity and promotion of the add-on.

Based on applications to date, the estimated potential applicant figures has been revised down to between 250 and 500 applicants.

### **B – Qualitative Evidence**

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

- The companion enhancement entitles the pass holder to have one carer (companion) with them who can travel for free. If the passholder has this enhancement, their pass will have an identifying symbol '+1' in the top right hand corner. Otherwise the design of the pass is the same as a normal pass.
- If a pass is issued with a +1 then it may expire sooner than it would without the +1. This is because the pass will only be issued until the end of the agreed period for the add-on, whereas the passholder may otherwise be entitled to a pass lasting longer, depending on the evidence provided.

- Companions can travel with the pass holder at any time that the passholder is entitled to travel. A companion CANNOT use the pass without the pass holder.
- A companion is someone (a carer, friend, relative etc.) of bus fare paying age, who can travel with and assist a Disabled Person's Pass holder when using public transport. It doesn't have to be the same person for each journey.
- Although the Disabled Person's Pass allows free travel for the pass holder throughout England, the companion can only travel free when the journey starts in Warwickshire, and the companion and the pass holder must get on and off the bus at the same point.
- It is possible for someone to meet the companion enhancement criteria but not qualify for an ENCTS pass. This is due to the ENCTS eligibility criteria which are set down in legislation, and which are outside the control of the Council.

### Section Three: Engagement

Engagement with individuals or organisations affected by the proposed activity must take place. For further advice and support with engagement and consultations, click [here](#).

<p><b>Has the proposed activity been subject to engagement or consultation with those it's going to impact, taking into account their protected characteristics and socio-economic status?</b></p>	<p>Yes</p>
<p><b>If YES, please state who with.</b></p>	<p>As part of the review of the concessionary travel scheme in July-September 2022, the following question was asked.</p> <hr/> <p><b>Do you think anyone else should be entitled to free or reduced cost bus travel?</b></p> <p><input type="checkbox"/> Young People aged 16-25</p> <p><input type="checkbox"/> A carer or companion travelling with a disabled passholder who cannot travel alone (eligibility criteria would apply)</p> <p><input type="checkbox"/> Apprentices</p> <p><input type="checkbox"/> Refugees</p>

	<input type="checkbox"/> No one else should be offered free or reduced cost bus travel <input type="checkbox"/> Other (please specify below)	
	<p>Over 74% of respondents (9,329 respondents) said that a carer or companion should be entitled to free or reduced cost travel. This compares to less than 20% choosing any other option.</p> <p>365 of those respondents had a pass because of a qualifying disability, and 291 respondents said they qualified because of their age but also have a disability.</p> <p>It is not possible to break the figures down by the nature of the disability, as that question was not asked. Not all people with disabled person's passes will qualify for the companion enhancement, as the proposed eligibility criteria mean that only the people whose ability to travel alone is most severely affected will qualify for the enhancement</p>	
<b>If NO engagement has been conducted, please state why.</b>		
<b>How was the engagement carried out?</b>	<b>Yes / No</b>	<b>What were the results from the engagement? Please list...</b>
<b>Focus Groups</b>	No	
<b>Surveys</b>	Yes	
<b>Public Event</b>	No	
<b>Displays / Exhibitions</b>	No	
<b>Other (please specify)</b>	No	

<b>Has the proposed activity changed as a result of the engagement?</b>	Yes	The feasibility of the proposed companion enhancement has been studied as a direct result of the scheme review survey results
<b>Have the results of the engagement been fed back to the consultees?</b>	No	
<b>Is further engagement or consultation recommended or planned?</b>	No	
<b>What process have you got in place to review and evaluate?</b>	We will collect feedback from passholders and members of the public through the life of the scheme to inform any similar future scheme.	

## Section Four: Assessing the Impact

### **Protected Characteristics and other groups that experience greater inequalities**

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposed activity? This section also allows you to consider other impacts, e.g. health inequalities such as deprivation, socio-economic status, vulnerable groups such as individuals who suffer socio-economic disadvantage, armed forces, carers, homelessness, people leaving prison, young people leaving care etc.

On the basis of evidence, has the potential impact of the proposed activity been judged to be positive (+), neutral (=), negative (-), or positive and negative (+&-), for each of the protected characteristic groups below and in what way?

**N.B** In our Guidance to EIAs we have provided you with potential questions to ask yourself when considering the impact of your proposed activity. Think about what actions you might take to mitigate / remove the negative impacts and maximize on the positive ones. This will form part of your action plan at Section Six.

	<b>Impact type (+) (=) (-) or (+&amp;-)</b>	<b>Nature of impact including health inequalities</b> Will your proposal have negative or positive implications for each group, including on health inequalities?	<b>Mitigating Actions for Negative Impacts</b> What can you do to mitigate any identified negative impacts or health inequalities? Use this column to form the basis of Section 6.
<b>Age</b>	=	There will be no specific advantage or disadvantages relating to age, as the companion enhancement will depend on level of disability and will be available to all, regardless of age. However, holders of older person's passes may not realise they can apply as it is linked to disability.	Careful consideration of methods of publicity used to publicise the scheme. There is a need to avoid raising expectations as only a small proportion of passholders will be eligible.
<b>Disability</b> Consider: <ul style="list-style-type: none"> <li>• Physical disabilities</li> <li>• Sensory impairments</li> <li>• Neurodiverse conditions (e.g. dyslexia)</li> <li>• Mental health conditions (e.g. depression)</li> <li>• Medical conditions (e.g. diabetes)</li> </ul>	=  +  -	<p>Not all passholders with disabilities will qualify for the companion enhancement, but their existing right to free bus travel will be unchanged.</p> <p>For those who do qualify for the companion enhancement there will be a benefit in that they will not have to pay when a companion travels with them on the bus network within Warwickshire.</p> <p>There may be negative impacts for those passholders who do not meet the eligibility criteria, particularly those who are vulnerable because of mental health conditions.</p>	Information needs to be clear from the beginning that there are eligibility criteria in order to avoid raising expectations.
<b>Gender Reassignment</b>	=	There is no anticipated impact.	
<b>Marriage and Civil Partnership</b>	=	There is no anticipated impact.	
<b>Pregnancy and Maternity</b>	=	There is no anticipated impact.	



	<b>Impact type (+) (=) (-) or (+&amp;-)</b>	<b>Nature of impact including health inequalities</b> Will your proposal have negative or positive implications for each group, including on health inequalities?	<b>Mitigating Actions for Negative Impacts</b> What can you do to mitigate any identified negative impacts or health inequalities? Use this column to form the basis of Section 6.
<b>Race</b> Including: <ul style="list-style-type: none"> <li>• Colour</li> <li>• Nationality</li> <li>• Citizenship</li> <li>• Ethnic or national origins</li> </ul>	=	People whose first language is not English may struggle to understand the entitlement and eligibility criteria	Careful consideration of methods and language used to publicise the scheme.
<b>Religion or Belief</b>	=	There is no anticipated impact.	
<b>Sex</b>	=	There is no anticipated impact.	
<b>Sexual Orientation</b>	=	There is no anticipated impact.	
<b>Groups who may require support:</b> <ul style="list-style-type: none"> <li>• Individuals who suffer socio-economic disadvantage</li> <li>• Armed Forces (WCC signed the <a href="#">Armed Forces Covenant</a> in June 2012)</li> <li>• Carers</li> <li>• Homelessness</li> <li>• People leaving Prison</li> <li>• People leaving Care</li> </ul>	=	There is no anticipated impact.	
<b>Other Identified Health Inequalities (HI)</b> Many issues can have an impact on health: is it an area of deprivation, does every population group have equal		What health inequalities already exist? <ul style="list-style-type: none"> <li>• Not all with disabilities will qualify for a bus pass under the statutory scheme (England National Concessionary Travel Scheme or ENCTS) bus pass. This is due to the legislation</li> </ul>	

	<b>Impact type</b> <b>(+) (=)</b> <b>(-) or</b> <b>(+&amp;-)</b>	<b>Nature of impact including health inequalities</b> Will your proposal have negative or positive implications for each group, including on health inequalities?	<b>Mitigating Actions for Negative Impacts</b> What can you do to mitigate any identified negative impacts or health inequalities? Use this column to form the basis of Section 6.
access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc.		<p>and guidance, and is outside the control of WCC.</p> <p>Will your proposal have a negative or positive implications on health inequalities?</p> <ul style="list-style-type: none"> <li>• There will be a positive impact on those passholders where their disability meet the companion enhancement eligibility criteria. There will be no impact on those people who are already unable to access the ENCTS pass.</li> </ul> <p>What can you do to mitigate any identified health inequalities?</p> <ul style="list-style-type: none"> <li>• Provide thoughtful and clear advice to people about eligibility, and how to obtain the appropriate evidence to show they are entitled to the ENCTS bus pass with the companion enhancement.</li> </ul>	
<b>Other Groups</b> If there are any other groups			

## **Public Sector Equality Duty (PSED)**

Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations. Please evidence how your proposed activity meets our obligations under the PSED.

	<b>Evidence of Due Regard</b>
<p><b>Eliminate unlawful discrimination (harrasment, victimisation and other prohibited conduct):</b></p>	<p>The criteria for holding a bus pass is set out in legislation and accompanying government guidance. WCC has no control over these.</p>
<p><b>Advance equality of opportunity:</b></p> <p>This involves</p> <ul style="list-style-type: none"> <li>removing or minimising disadvantages suffered by people due to their protected characteristics;</li> <li>taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people, for example, taking steps to take account of people with disabilities;</li> <li>encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.</li> </ul>	<p>The current bus pass scheme is a statutory scheme set up by central government, and not all passholders can access the service equally. For example, those who must be accompanied at all times must pay extra for a carer or companion to travel, even when their own travel is free of charge.</p> <p>A companion enhancement allows some people who would otherwise be unable to access public transport to do so, subject to some eligibility criteria.</p> <p>The criteria are necessary in order to provide the scheme within the funds available whilst assisting those least able to access bus travel at present.</p>
<p><b>Foster good relations:</b></p> <p>This means tackling prejudice and promoting understanding between people from different groups and communities.</p>	<p>The companion enhancement will not be available to all passholders, and so it is important to make it clear that there is limited funding and this is being directed where we believe there is the most need.</p>

## Section Five: Partners / Stakeholders

Which sectors are likely to have an interest in or be affected by the proposed activity?	Yes / No	Describe the interest / affect
<b>Businesses</b>	No	
<b>Councils</b>	No	
<b>Education Sector</b>	No	
<b>Fire and Rescue</b>	No	
<b>Governance Structures</b>	No	
<b>NHS</b>	No	
<b>Police</b>	No	
<b>Voluntary and Community Sector</b>	Yes	Carers and companions of people with a disabled person's bus pass are often unpaid, or work for charitable or voluntary organisations. Voluntary and community organisations often act as advocates for people who either hold or wish to apply for a disabled person's bus pass.
<b>Other(s): please list and describe the nature of the relationship / impact</b>		

## Section Six: Action Planning

If you have identified impacts on protected characteristic groups in Section Four, please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. It is also important to consider how often this E.I.A. will be reviewed, and who is responsible for doing this. If you are not taking any action to support or mitigate the impact, you should complete the No Mitigating Actions section below instead.

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible
The scheme is proposed to run for a fixed period until 31 March 2027.	Publicity material must make it clear that that this is a short term scheme. There is a proposed government review of the concessionary travel scheme entitlement and benefits, and this may change how the service is funded and/or delivered. There is currently no date for this, but changed to eligibility will require primary legislation. and scheme.	The scheme will be reviewed again before the proposed end date (likely to be late 2026), to assess affordability, and take up. A report will be taken to Cabinet before the scheme expires with recommendations as to whether a further scheme can be agreed	Concessionary Travel Lead (Jo Cooper)
Not all passholders will qualify for the companion enhancement.	Eligibility criteria need to be clear so as not to raise expectations. Eligibility criteria will be approved by Cabinet and so changes (if any were required) would need to be approved by Cabinet.	Data about applicants and applications will be retained and evaluated when the scheme is reviewed.	Concessionary Travel Lead (Jo Cooper)
Evidence initially listed as acceptable may not be available to all applicants.	The list of acceptable evidence will be kept under review. Additional pieces of evidence will be considered on an individual basis.	The evidence list will be kept under continual review and if additional suitable pieces of evidence are identified they will be added.	Concessionary Travel Lead (Jo Cooper)

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible
People who do not qualify for the companion enhancement may think the eligibility criteria are unfair.	Feedback from the public will be retained and collated, and considered when the scheme is reviewed.	In line with the review mentioned above.	Concessionary Travel Lead (Jo Cooper)

**No Mitigating Actions**

Please explain why you do not need to take any action to mitigate or support the impact of your proposed activity.
n/a

**Section Seven: Assessment Outcome**

Only one of following statements best matches your assessment of this proposed activity. Please select one and provide your reasons.		
No major change required		
The proposal has to be adjusted to reduce impact on protected characteristic groups and/or health inequalities		
	x	It is accepted that the scheme will be limited by the funds available, and this means limiting the eligibility and timescale,.

<b>Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and/or health inequalities</b>		However, the enhancement as proposed is of more benefit than continuing without the enhancement.
<b>Stop the proposal as it is potentially in breach of equality legislation</b>		

### Section Eight: Sign Off

**N.B** To be completed after the EIA is completed but before the area of work commences.

<b>Name of person/s completing EIA</b>	Jo Cooper
<b>Name and signature of Assistant Director</b>	
<b>Date</b>	
<b>Date of next review and name of person/s responsible</b>	

Once signed off, please ensure the EIA is uploaded using the following form. Please name it “EIA [project] [service area] [year]”: [Upload Completed Equality Impact Assessments](#)

These will be stored on a [Sharepoint library](#) which Warwickshire County Council colleagues can access.

**It is the responsibility of the individuals and teams who completed the EIA to review it regularly and to carry out any required activities in line with the action plan made.**

**For advice or support, please contact [equalities@warwickshire.gov.uk](mailto:equalities@warwickshire.gov.uk).**