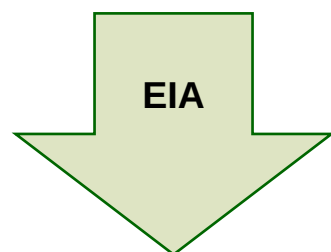


Warwickshire County Council (WCC) Equality Impact Assessment (EIA) Form

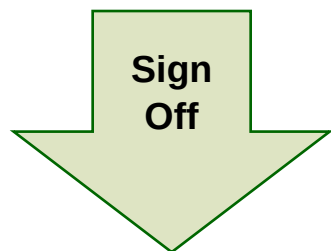
The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

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](#).

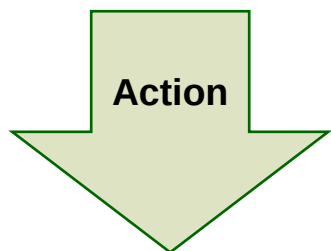
Please note that once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity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



- Having identified an EIA is required, ensure that the EIA form is completed before any work is started. This includes gathering evidence and / or engaging the relevant stakeholders to inform your assessment.



- Brief the relevant Assistant Director for sign off and upload the completed form here: [Upload Completed Equality Impact Assessments](#). Please name it "EIA [project] [service area] [year]"
- Undertake further research / engagement to further understand impacts (if identified).
- Undertake engagement and / or consultation to understand if EIA has identified and considered impacts.
- Amend accordingly to engagement / consultation feedback and brief decision makers of any changes.



- Implement proposed activity.
- Monitor impacts and mitigations as evidence of duty of care.

Section One: Essential Information

Service / Policy / Strategy / Practice / Plan being assessed	Home to School Transport Policy
Business Unit / Service Area	Transport Delivery
Is this a new or existing service / policy / strategy / practice / plan? If existing, please state date of last assessment.	Existing service. Some aspects of this policy reviewed in 2022/2023. Dated June 2023.

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

Home to School Transport is a key area of Council expenditure and has been rising significantly from £17.9m in 2018/19 to a forecast of £46.7m in 2025/26. During this time there has been a consistent rise in numbers applying for transport

The policy is being changed for several reasons:

- To update the policy to better reflect the changes that DfE made to its statutory guidance in 2024.
- To revise non-statutory duties
- To ensure consistencies in the transport policy
- To make sure the service is working as efficiently as financially possible

Alongside parental responsibility the other key area to review on WCC policy is parental preference when applying for a school place and assessing school spaces at a consistent stage (time of school offer). This will ensure that transport is provided to students that are attending their nearest or priority school, or parents' preference their nearest or priority school in the school admissions application process, necessary to reduce the transport provided to those not attending nearest schools.

There are other areas that the current policy requires clarification, most notably the policy on unsafe routes, extenuating circumstances and the application process.

The timescale to allow the introduction of the refreshed H2S Transport Policy is challenging and revolves around two factors.

- Allowing for a legal timeframe for the public consultation and ensuring feedback is investigated and analysed via the governance process.
- The new policy is implemented at the right time of year for it to be considered by families at Key Stage transfer.

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

To mitigate the issues outlined in section one, Warwickshire County Council proposes to make the following key changes:

Section	Policy Changes
Policy structure and clarification	Amend whole policy for easier reading and to clarify information, including removal of reference within the policy to the Paid Vacant Seat as a non-statutory service. This can be promoted separately.
Eligibility	Removal of SEND nursery age transport provision (non-statutory service.) Removal of reference to transport eligibility to Priority Schools (also known as catchment schools) as eligibility in future will be based on whether the pupil is attending their nearest suitable setting with spaces available. The amended policy would make clear that there will be no entitlement to home-to-school transport assistance if a place would have been available at a school nearer the child's home address, had it been listed as a priority, or higher priority, in the application process. Extenuating Circumstances - • Clarification on transport eligibility due to the operation of the Fair Access Protocol, offsite directions, the use of alternative provisions, suspensions, and illnesses. • Removal of transport from respite care. Clarification on extended rights for children in receipt of free school meals and families receiving other qualifying benefits. Amendments to Post 16 eligibility to make clear the expectation that families will utilise all sources of funding and mobility vehicles before there will be entitlement to transport assistance.

	All Post 16 pupils must be attending a full-time course AND EITHER: the distance from the home address to the educational setting must be 3.00 miles or more, OR, if the distance is below 3.00 miles, travelling time via public transportation must exceed 75 minutes (one way). Circumstances outside of this will be considered on an individual basis
Statutory Walking Distance	Lack of streetlighting will not be considered as automatically rendering a route unsafe when assessing the availability of walking routes. Routes assessed as unsafe will be reviewed every 6 months. Pathways/ footpaths and footways will be considered as per national guidance.
Travel assistance	Transport that is not a bus pass or Direct Travel Payment ("DTP") will be classed as Alternative Assistance - reduced descriptions in policy as it is not a statutory requirement to describe precisely what transport will be provided. When a pupil in Year 9 to Year 11 and has an Education, Health and Care Plan, and a bus pass or DTP is refused or not appropriate, independent travel training ("ITT") will be encouraged where possible. Those eligible for SEND Post 16 travel will be offered a bus pass or DTP. Should parents consider that this would not be suitable then the pupil will be considered for ITT.
Parental Information	Exam arrangements - travel assistance will not be adjusted for alternative settings and pick up times. If a pupil is attending their nearest school and the safe walking distance is under the statutory walking distance, however their parents' mobility needs mean that they are unable to accompany the pupil or facilitate transport to their education setting, this will be considered on a discretionary basis by the council. Drop off and pick up points will be utilised, and it will be parent's responsibility to ensure pupils reach the required stop.

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.

2. Who is this going to impact and how?

Customers	Members of the Public	Employees	Job Applicants
Families, parents, carers, children and young people, including those aged (0-25) with Educational Health Care Plans	Families, parents, carers, children and young people, including those aged (0-25) with Educational Health Care Plans	Within WCC - Transport, Education and Social Services. External - Schools and colleges.	n/a
Other, please specify:	Transport Providers in Warwickshire		

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.

We transport approx. 10,000 pupils in Warwickshire Home to School transport service. Outlined below are the areas of the policy that will affect certain cohorts of pupils.

Area of policy	Number of pupils affected if policy implemented for new applications only per academic year	Number of pupils affected if policy implemented to all pupils currently receiving free travel assistance.
SEND Nursery age	Fewer than 5	Fewer than 5
Compulsory School age	Between 250 and 400	Between 1000 and 1100
Post 16 SEND	Between 50 and 100	Between 200 and 300

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.

It is proposed that pupils who are currently entitled to free home to school transport would not be affected by the change in policy. All new applications for home to school transport, whether that is due to a change in address, school or circumstance would be assessed in line with the new policy. This could mean that siblings receive different entitlements to transport.

With our Post 16 SEND cohort that would be affected by the new policy, that must apply each year, we would consider past entitlement and type of transport provide when assessing any new applications.

The exception to the above would be the consideration of streetlighting in safe route assessments. It is proposed that when a route has been deemed safe against the new policy, all current pupils that will be affected by this change will have transport retracted at the end of the current academic year.

This section shall be considered further once consultation responses are received.

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](#).

Has the proposed activity been subject to engagement or consultation with those it is going to impact, taking into account their protected characteristics and socio-economic status?	No	
If YES, please state who with.		
If NO engagement has been conducted, please state why.	Awaiting approval to formally go out to consult. The consultation will invite feedback Equality Impacts identified and this EQIA will be updated following consultation to take account of any additional impacts highlighted.	
How was the engagement carried out?	No	What were the results from the engagement? Please list...
Focus Groups		
Surveys		
Public Event		
Displays / Exhibitions		
Other (please specify)		
Has the proposed activity changed as a result of the engagement?		

Have the results of the engagement been fed back to the consultees?	No	Consultation Not started yet - Please see Home to School Transport Consultation Communication Marketing Strategy 2025 for further information
Is further engagement or consultation recommended or planned?	Yes	A public consultation on the proposed changes to the Home to School Transport Policy. If approved, we will be working closely with staff from across Warwickshire County Council to deliver a comprehensive and inclusive consultation on the Home to School Transport service. Our key audiences include: • Parent carers • Young people • Transport providers • Warwickshire Parent Carer Voice • Elected members • Education settings (including schools and colleges) We will do this by: - • Raising awareness of the consultation through a range of targeted communication channels, tailored to reach specific audiences effectively. • Sharing real stories and experiences to build a positive narrative and create momentum for change. • Identifying and preparing key spokespeople, including the portfolio holder and relevant technical specialists to deliver consistent and credible messages across all platforms. • Hosting briefing sessions for staff and key stakeholders to ensure they fully understand the proposed changes and feel confident in supporting families to engage with the consultation process. • Providing clear, concise, and accessible communications that explain the proposed changes and outline the decision-

		making process, helping to build trust and transparency throughout the consultation.
What process have you got in place to review and evaluate?	The information / results will be correlated and analysed by WCC internal business intelligence team.	

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.

	Impact type (+) (=) (-) or (+&-)	Nature of Impact
Age	+&-	Pupils of certain ages will be affected by the change in policy. - The most affected group will be the Post 16 SEND cohort, by the reduction of transport assistance that is provided via a smaller vehicle and the requirements for eligibility. There will be expectations that this cohort of pupils will be able to independently travel to their education setting and will consider transport to their education settings at the time of choosing their courses. - Pupils of compulsory school age will not be eligible for transport if not attending their nearest school with spaces irrelevant of catchment, or their walking route becomes a safe walking route due to the new assessment criteria, meaning parents will be responsible for getting their children to school.

		- Families will be expected to transport nursery age SEND pupils to their relevant settings. - The removal of street lighting as a consideration for safe walking routes will mean that families will have an increase in responsibility to ensure that their children are safe to walk to school where there is no street lighting. Families will need to consider whether their children need to be accompanied or need additional equipment, such as torches and high vis, when walking to their setting.
Disability Consider: • Physical disabilities • Sensory impairments • Neurodiverse conditions (e.g., dyslexia) • Mental health conditions (e.g., depression) • Medical conditions (e.g., diabetes)	+&-	There will be expectations that families will assist pupils with disabilities, where previously they may have received transport outside of statutory requirements, to take responsibility for their child accessing their education setting. Door to door transport will be reduced, meaning that pupils will be required to board their transport at local points, such as a bus stop. The cohort that will mostly be affected by this change are those with EHCPs. Families will need to ensure that pupils are safe and able to access the relevant drop off and pick up points and are there within appropriate timeframes. Pupils will be expected to utilise public transport where able, this may create uneasiness in pupils with disabilities. Pupils will be required to work with relevant support networks and teams, to gain independence in transport, such as Independent Travel Training. Families will be required to apply and utilise all other external resources to them before being considered for transport
Gender Reassignment	=	No known impact, data is not gathered.
Marriage and Civil Partnership	=	No known impact, data is not gathered.

Pregnancy and Maternity	=	No known impact.
Race Including: • Colour • Nationality • Citizenship • Ethnic or national origins	=	No known impact.
Religion or Belief	=	No known impact.
Sex	=	No known impact.
Sexual Orientation	=	No known impact.
Groups who may require support: • Individuals who suffer socio-economic disadvantage • Armed Forces (WCC signed the Armed Forces Covenant in June 2012) • Carers • Homelessness • People leaving Prison • People leaving Care	+&-	Pupils of socio-economic disadvantage which will not be entitled due to the new guidance on extended rights criteria. Families that do not meet this threshold will be responsible for ensuring their children are able to access their education setting.
Other Identified Health Inequalities (HI)		Families who are not covered in the extended rights or exceptional circumstances aspect of the proposed policy, will be required to provide sufficient medical evidence

Many issues can have an impact on health: is it an area of deprivation, does every population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc.		for discretionary transport to be considered. Without suitable evidence, families would remain responsible for ensuring their children access their education setting. This would affect parents with needs which mean they cannot accompany their child walking or travelling to their education setting.
Other Groups 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.

	Evidence of Due Regard
Eliminate unlawful discrimination (harassment, victimisation and other prohibited conduct):	The proposed policy has been reviewed by WCC legal services throughout the development to ensure none of the proposals are unlawful. The proposed changes are designed to ensure that residents will not be disadvantaged as a consequence of any protected characteristic. The proposed policy will be reviewed by various groups within the Council to ensure all concerns and challenges are considered, this included WCC Overview and Scrutiny board.

	By lawfully consulting with the public prior to making any changes, this will ensure all views are considered when making a final decision on the proposed policy.
Advance equality of opportunity: This involves • removing or minimizing disadvantages suffered by people due to their protected characteristics; • 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; • encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low.	By engaging and consulting with the public prior to making any changes, this will ensure the voice of the local community is heard and considered when making a final decision on the proposed policy. The Council will proactively aim to reach residents of all characteristics, ensuring there are various accessible ways residents can communicate their views ensuring there is a varying degree of views considered when finalising the proposal. The proposals aim to streamline and ensure that all residents in Warwickshire are treated fairly and in accordance with statutory guidance, by providing consistent and clear parameters based on government guidance.
Foster good relations: This means tackling prejudice and promoting understanding between people from different groups and communities.	Where transport assistance will be reduced or changed, the service will work with the appropriate stakeholders to ensure notice and advice is given. Links with other services will be made to assist with overcoming any difficulties, when appropriate.

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 / effect
Businesses	Yes	Local Transport Providers - may cause changes to contracts or future working models. Media - the local media will be interested in the proposed changes as it will affect their residents.
Councils	Yes	CEO and ED's of WCC - will want to ensure proposals are communicated and consulted with effectively. Will want to ensure that any changes are aligned with statutory guidance.

		Councillors - advocate and represent their constituents' views as well as considering the Council's position. Members of Parliament - Advocate and represent the local area, have the ability and knowledge to escalate matters to a government level when required.
Education Sector	Yes	Education settings - Schools, Alternative Provisions and Colleges - Any changes could affect their pupils and possibly how they access the education setting.
Fire and Rescue	No	
Governance Structures	No	
NHS	No	
Police	No	
Voluntary and Community Sector	Yes	Advocation groups/agencies for vulnerable learners/families - WPCV, IMPACT, SENDIAS - ensure that all views are considered, support is offered, and that the Council are acting lawfully.
Other(s): please list and describe the nature of the relationship / impact		

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.

Mitigating Actions

Consider:

- Who else do you need to talk to? Do you need to engage or consult?
- How you will ensure your activity is clearly communicated
- Whether you could mitigate any negative impacts or build on positive impacts for protected groups or health inequalities
- Whether you could do more to fulfil the aims of the PSED
- How you will monitor and evaluate the effect of this work
- Anything else you can think of!

Identified Impact	Action(s)	Timescale incl. evaluation and review date	Name of person responsible
Age - Nursery SEND pupils	The number of pupils affected is less than 5 currently and this is the trend in previous years. If the policy is approved as currently drafted, the transport service will ensure that all services that support families with children with SEND at nursery age are aware of the changes the proposed policy and prepare families as needed.	Consultation is live from November 2025 to December 2025. Analysis of feedback will be conducted in spring 2026. The final report will go to Cabinet in the summer with the policy implemented before the end of summer term. The transport service will communicate with the Early Years service and SENDAR to ensure guidance and advice is consistent and clear to this cohort going forward, this	Lilian Hunter/Kirsty Anderson/David Ayton-Hill/Ross Caws.

		will be reviewed as and when required.	
Age - Compulsory school age	If the policy is approved as currently drafted, the proposed policy will be implemented at the end of the summer term, meaning families of Key Stage Transfer pupils will be able to consider the new policy when choosing their child's school setting. Communication will be sent alongside admission arrangements, through the education system outlining the changes and referring families to read the transport policy before choosing a school setting.	Consultation is live from November 2025 to December 2025. Analysis of feedback will be conducted in spring 2026. The final report will go to Cabinet in the summer with the policy implemented before the end of summer term. Communication will be reviewed with the admissions service every summer to ensure that any information sent to parents is aligned, clear and consistent.	Lilian Hunter/Kirsty Anderson/David Ayton-Hill/Matt Biggs.
Age - Compulsory school age	If the policy is approved as currently drafted, the service will work with families and schools which are affected by any change in the safe walking routes assessment criteria. This cohort will receive communication with clear offers of service from our road safety team, timeframes of any adjustments that will be made to transport assistance and where further information can be sourced.	Consultation is live from November 2025 to December 2025. Analysis of feedback will be conducted in spring 2026. The final report will go to Cabinet in the summer with the policy implemented before the end of summer term. Schools and families that will be affected, will be proactively contacted and engaged with to ensure all concerns are considered. This engagement will continue onwards as and when required or highlighted.	Lilian Hunter/Kirsty Anderson/David Ayton-Hill

Age - Post 16 SEND pupils	If the policy is approved as currently drafted, we will have robust processes in place to ensure in-depth assessments occur based on evidence-based information and the appropriate transport support based on the evidence is provided. By encouraging and assisting pupils to gain independence with their travel to their education setting, we are increasing alignment with the preparation for adulthood agenda and assisting with their ability to interact with the community in a safe manner. All families will be able to challenge decisions made on the type of assistance offered through the relevant teams and our formal appeals process.	Consultation is live from November 2025 to December 2025. Analysis of feedback will be conducted in spring 2026. The final report will go to Cabinet in the summer with the policy implemented before the end of summer term. All processes in place to ensure this impact is minimum, will be continuous and embedded in the best practice working model for the service. They will be reviewed regularly to ensure across service working, accessibility and are abiding by the relevant statutory guidance.	Lilian Hunter/Kirsty Anderson/David Ayton-Hill /Ross Caws/Sam Powers
Disabilities	If the policy is approved as currently drafted, we will work with families to ensure that those that have additional needs are supported with the changes proposed and that services that work with the families are aware of any additional support available to them. To ensure the proposed policy is easy to follow and families can understand requirements for entitlements and our processes, we will develop short documents available on the webpage	Consultation is live from November 2025 to December 2025. Analysis of feedback will be conducted in spring 2026. The final report will go to Cabinet in the summer with the policy implemented before the end of summer term. When the policy is in place, we will work with other services to develop the additional information documents for them to be added to the webpage for parents to access. We will work	Lilian Hunter/Kirsty Anderson/David Ayton-Hill/Lisa Mowe/Ross Caws/Matt Biggs

	that will be identified by the different pupil cohorts. These will include flow charts, FAQs and which sections of the policy that relate to that area. Families will then be able to make informed decisions when requesting education placements. Individuals where families request support outside of the policy and medical evidence is provided, that discretionary assistance should be considered, will be reviewed on an individual basis by the service.	We would aim to have these in place by September 2026. Ongoing advice and guidance will be embedded as best practice in the transport service.	
Groups who may require additional support	We will work with families to ensure that those that have additional needs are supported with the changes proposed and that services that work with the families are aware of the additional support available to them. To ensure the policy is easy to follow and families can understand requirements for entitlements and our processes, we will develop short documents available on the webpage that will be identified by the different pupil cohorts. These will include flow charts, FAQs and which sections of the policy relate to that area. Families will then be able to make informed decisions when requesting education placements.	Consultation is live from November 2025 to December 2025. Analysis of feedback will be conducted in spring 2026. The final report will go to Cabinet in the summer with the policy implemented before the end of summer term. Ongoing advice and guidance will be embedded as best practice in the transport service and other relevant WCC services.	Lilian Hunter/Kirsty Anderson/David Ayton-Hill/Lisa Mowe/Ross Caws/Matt Biggs

No Mitigating Actions

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

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		
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups and/or health inequalities	X	
Stop the proposal as it is potentially in breach of equality legislation		

Section Eight: Sign Off

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

Name of person/s completing EIA	
Name and signature of Assistant Director	
Date	
Date of next review and name of person/s responsible	

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