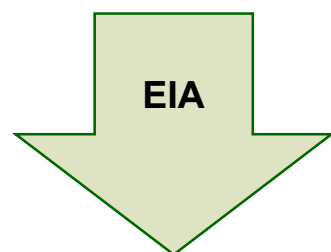


Warwickshire County Council (WCC) Equality Impact Assessment (EIA) Form

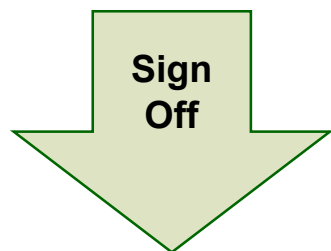
The purpose of an EIA is to ensure WCC is as inclusive as possible, both as a service deliverer and as an employer. It also demonstrates our compliance with Public Sector Equality Duty (PSED).

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](#).

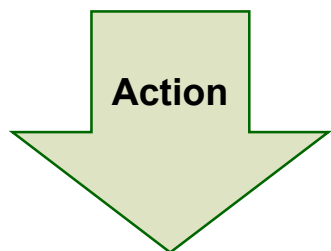
Please note that, once approved, this document will be made public, unless you have indicated that it contains sensitive information. Please ensure that the form is clear and easy to understand. If you would like any support or advice on completing this document, please contact the Equality, Diversity and Inclusion (EDI) team on 01926 412370 or 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	SEND & Inclusion Services
Business Unit / Service Area	SEND & Inclusion in Education Services and Transport
Is this a new or existing service / policy / strategy / practice / plan? If existing, please state date of last assessment.	Existing service – last reviewed as part of the Ernst and Young Report in late 2021
EIA Authors N.B. It is best practice to have more than one person complete the EIA to bring different perspectives to the table.	Duane Chappell, Ross Caws, Max Beesley
Do any other Business Units / Service Areas need to be included?	Education Services, Children and families service, Adult social care
Does this EIA contain personal and / or sensitive information?	No
Are any of the outcomes from this assessment likely to result in complaints from existing services users, members of the public and / or employees?	Yes – Potential changes to services received by Children and Young People with Special Education Needs.

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

Following a review of the Special Educational Needs Home to School Transport service research discovered the following:

- Over the last three years (2019/20 to 2021/22) the SEND Home to School Transport (H2ST) budget has increased by c.£3m. Despite this increase in budget, each year the Council has overspent on SEND H2ST services. In 2021/22, the Council are forecasting a c.£0.47m overspend.
- The pressure on the service continues to increase due to a rising demand for transport service. Consistently across the three years, taxis are the highest spend category, with spend increasing by 20% from 2017/18 to 2018/19 and 10% from 2018/19 to 2019/20.
- The current service is disjointed, siloed and whilst a number of processes are established, the appropriate planning, controls, governance and monitoring frameworks are not in place. As a result, the current service is largely reactive with sub-optimal demand and contract management functions. In addition, there are insufficient resources in place to support effective contract management, compliance and assurance.
- Whilst the concept of demand management is understood, there is no strategic approach to managing demand, understanding need and ensuring there is sufficient capacity in the market.
- Data insights and intelligence, including forecasts of potential demand pressures are not currently shared across the Council teams. As a result, the opportunities to influence demand are not being maximised and there is a limited focus on promoting independence.

The concept and importance of outcome-based commissioning and the interface between the market is understood. However, due to capacity constraints, the approach to commissioning is more reactive and opportunities to proactively shape the market are not maximised. This, coupled with a lack of robust processes, controls and evidence-based approach to decision making, results in the Council effectively being in a sellers' market.

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

In order to mitigate the issues outlined in section one, Warwickshire looked to improve on the following key areas:

- **Applications, assessments & Reviews**
 - Review of how transport applications are currently processed
 - Review of travel menu (what options customers are eligible for)
 - Review of Needs Assessment Framework (Review of eligibility criteria)
 - Annual Reviews of children and young people's eligibility
- **Independent Travel Training**
 - Review and Redesign of new service that provides training for children and young people (promoting preparation for adulthood)
- **Strategic & Operational Commissioning**
 - Review of Decision-making processes with the Service
 - Establishing Decision making forums across the pathway
 - Establishing KPIs and Performance Management Frameworks
- **Contract Management**
 - Completing a network review of all Transport Providers
 - Review of Contract Management, Compliance and Assurance processes
 - Defining KPIs and RAG ratings to review providers performance
- **IT and Digital**
 - Investigation for potential app for children/ young people, parent carers and providers
- **Data and Performance**
 - Review of Data across the pathway
 - Identify and mitigate data apps to enable service to track performance and Increase decision making

3. Who is this going to impact and how?

Customers	Members of the Public	Employees	Job Applicants
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Yes Families, parents, carers, children and young people (0-25) of Warwickshire with SEN Support and Educational Health Care Plans	Yes Future families, parents, carers, children and young people (0-25) of Warwickshire with SEN	Transport and SEND & Inclusion staff. Yes Employees within SEND and Inclusion	n/a
Other, please specify:	Transport Providers in Warwickshire		

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.

The data available listed below enables the Project to:

- identify groups protected by the Equality Act (2010),
- identify groups (stakeholders) and underrepresented groups impacted by Programme and project changes,
- provide focus areas for consultation, engagement, and communication.

1) Equality Data

[01 SEND Equality Data Dec21.xlsx](#)

Total SEN Support children: 10,650 - 3855 (36%) are Girls and 6795 (64%) are Boys.

	Children and Young People with an Education Health and Care Plan (EHCP)	Children and young people with SEN Support
Data source	Synergy	School Census
Age	Data available	Data available
Disability	Data available	Data available
Sex	Data available	Data available
Race	Data available	Data available
Gender reassignment	Data not easily available to report on. If gender is changed legally, changes are made to records in Synergy, but only if it is official. Records are changed, but a note made in the notes section. Notes are kept if genders have changed but not officially e.g. known by this name or prefers to be referred to as this gender	Data not collected
Religion or belief	Data not held yet. There is a religion field in Synergy, however it is not actively maintained. Processes are in place for maintaining the child's attendance and address then plans are to move to reviewing ethnicity and religion. This dataset cannot be relied upon at the moment but perhaps in the future.	Data not collected
Marriage and civil partnership	Data not held	Data not collected
Pregnancy and maternity	Data not held - There is a field for this in Synergy but it is not used	Data not collected
Sexual orientation	Data not held	Data not collected

1. Age

EHCP Population				SEN Support Population			
Year Group	Girls	Boys	Total	Year Group	Girls	Boys	Total

Nursery	7	7	14		Nursery	62	127	189
Reception	38	108	146		Reception	141	359	500
NC Year 01	44	126	170		NC Year 01	234	495	729
NC Year 02	36	129	165		NC Year 02	243	557	800
NC Year 03	46	164	210		NC Year 03	336	604	940
NC Year 04	73	173	246		NC Year 04	330	626	956
NC Year 05	70	179	249		NC Year 05	366	661	1027
NC Year 06	72	227	299		NC Year 06	362	581	943
NC Year 07	84	211	295		NC Year 07	386	637	1023
NC Year 08	87	218	305		NC Year 08	327	550	877
NC Year 09	76	212	288		NC Year 09	320	529	849
NC Year 10	94	242	336		NC Year 10	291	448	739
NC Year 11	89	216	305		NC Year 11	287	431	718
NC Year 12	100	239	339		NC Year 12	76	110	186
NC Year 13	76	226	302		NC Year 13	93	80	173
NC Year 14	91	196	287		NC Year 14	*	*	*
NC Year 15	64	168	232		Total	3855	6795	10650
NC Year 16	59	121	180					
NC Year 17	46	88	134					
NC Year 18	39	84	123					
NC Year 19	11	40	51					
NC Year 20	14	25	39					
NC Year 21	*	8	9					
NC Year 22	*	*	*					
Total	1318	3407	4725					

* Value is less than 5

2. Disability of Children

EHCP Population			
Special Need	Girls	Boys	Total
Autistic Spectrum Disorder (inc. Asperger's Syndrome)	351	1247	1598
Hearing Impairment	28	26	54
Moderate Learning Difficulty	183	319	502
Multi-Sensory Impairment	5	6	11
Other Difficulty/Disability	46	80	126
Physical Difficulties	81	110	191
Profound and Multiple Learning Difficulties	26	31	57
SEN support but no specialist assessment of type of need	*	*	8
Severe Learning Difficulty	72	133	205
Social, Emotional and Mental Health	284	850	1134
Specific Learning Difficulty	22	46	68
Speech, Language and Communication Needs	195	521	716
To be identified	*	*	*
Visual Impairment	21	32	53
Total	1318	3407	4725

SEN Support Population			
Special Need	Girls	Boys	Total
Autistic Spectrum Disorder (inc. Asperger's Syndrome)	213	638	851
Hearing Impairment	79	62	141
Moderate Learning Difficulty	1153	1607	2760
Multi-Sensory Impairment	9	25	34
Other Difficulty/Disability	133	213	346
Physical Difficulties	112	161	273
Profound and Multiple Learning Difficulties	*	*	5
SEN support but no specialist assessment of type of need	77	149	226
Severe Learning Difficulty	5	17	22
Social, Emotional and Mental Health	656	1429	2085
Specific Learning Difficulty	502	752	1254
Speech, Language and Communication Needs	511	1205	1716
To be identified	361	469	830
Visual Impairment	42	65	107
Total	3855	6795	10650

* Value is less than 5

3. Race

EHCP Population			
Ethnic Group	Girls	Boys	Total
Any Other Ethnic Group	*	26	**
Asian - Any Other Asian Background	8	33	41
Asian - Bangladeshi	*	*	*
Asian - Indian	21	79	100
Asian - Pakistani	7	18	25
Black - Any Other Black Background	*	16	**
Black - Black - African	10	24	34
Black - Black Caribbean	*	10	**
Chinese	*	*	*
Information Not Yet Obtained	95	270	365
Mixed - Any Other Mixed Background	20	49	69
Mixed - White and Asian	10	32	42
Mixed - White and Black African	*	18	**
Mixed - White and Black Caribbean	17	49	66
Refused	*	10	**

SEN Support Population			
Ethnic Group	Girls	Boys	Total
Asian - Any other Asian background	18	40	58
Asian - Bangladeshi	38	45	83
Asian - Indian	*	10	**
Asian - Pakistani	71	127	198
Black - Any other Black background	10	24	34
Black - Black African	5	9	14
Black - Black Caribbean	22	53	75
Chinese	*	15	**
Information Not Yet Obtained	6	5	11
Mixed - Any other Mixed background	76	121	197
Mixed - White and Asian	65	118	183
Mixed - White and Black African	39	72	111
Mixed - White and Black Caribbean	15	49	64
Refused	59	96	155
White - Any other White background	17	40	57

White - Any Other White Background	40	110	150
White - Gypsy / Roma	*	9	**
White - Irish	*	11	**
White - Traveller of Irish Heritage	*	6	**
White - White British	1064	2631	3695
Grand Total	1318	3407	4725

* Value is less than 5

**Value removed due to data identification purposes

White - Gypsy/Roma	151	301	452
White - Irish	13	19	32
White - Traveller of Irish heritage	8	23	31
White - White British	5	8	13
Total	3232	5620	8852
Grand Total	3855	6795	10650

2) **Local Area SEND Inspection Data Dashboard** [Data Dashboard - Local Area SEND Inspection Jan2022.pdf](#)

3) **Specific Gypsy Romany Traveler (GRT) statistics** [GRT Spring 22 - SEND V2 \(2\).xlsx](#)

Below is the number and percentage of GRT CYP with EHCP and SEND Support

SEN Status	No' of pupils	
No SEND (N)	168	73.4%
SEN Support (K)	49	21.4%
EHCP (E)	<u>12</u>	5.2%
	229	

The document also shares a list of:

- Warwickshire schools with the highest representation of GRT Children and Young People
- Gender data
- Disability Primary and Secondary Need

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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.

https://councilfordisabledchildren.org.uk/sites/default/files/uploads/files/Lenehan_Review_Report_0.pdf

<https://councilfordisabledchildren.org.uk/sites/default/files/uploads/attachments/Lessons%20Learnt%20From%20Loc>

WSOA – from ofsted INCLUDE.
ADD EMAIL ATTACHMENT FROM ROSS.

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](#).

	Yes
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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?		
If YES, please state who with.	<ul style="list-style-type: none"> • SEND & Inclusion staff • WCC staff • Schools and settings providing education to Warwickshire children and young people • Warwickshire's Parents/ Carers (represented by Warwickshire Parent Carer Voice) • Warwickshire's SEN Transport Providers • Children and Young people (represented by the youth group IMPACT) • Seldom heard group representing; <ul style="list-style-type: none"> ○ Armed forces ○ Gypsy Roma Traveler communities ○ Armed forces 	
If NO engagement has been conducted, please state why.		
How was the engagement carried out?	Yes / No	What were the results from the engagement? Please list...
Focus Groups	Yes	
Surveys	Yes	
Public Event	No	
Displays / Exhibitions	No	

Other (please specify)		
Has the proposed activity changed as a result of the engagement?		Yes
Have the results of the engagement been fed back to the consultees?	Ongoing	Reported back to staff and the WPCV.
Is further engagement or consultation recommended or planned?		Yes, a public consultation on the proposed changes to the SEN Home to School Transport Policy.
What process have you got in place to review and evaluate?	The information/ results will be collated 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	+	Ensures services deliver from 0-25 years for those eligible. Provide a simplified assessment process. Provide increased alignment to preparation for adulthood. Clear core offer of transport provision.
Disability Consider: <ul style="list-style-type: none"> Physical disabilities Sensory impairments Neurodiverse conditions (e.g. dyslexia) Mental health conditions (e.g. depression) Medical conditions (e.g. diabetes) 	+	The SEN Home to School transport service offer is changing the way people apply for their provision, how they're assessed and how the policy is implemented. The intention is that by changing the current way of working users will see: <ul style="list-style-type: none"> An increase independence Clear and simplified policy Simplified application process A needs based approach in assessing transport provision
Gender Reassignment	=	No known impact, data is not gathered. This is an area for future develop and monitoring.

Marriage and Civil Partnership	=	No known impact, data is not gathered.
Pregnancy and Maternity	=	No known impact, data is not gathered.
Race Including: <ul style="list-style-type: none"> • Colour • Nationality • Citizenship • Ethnic or national origins 	+&-	No known impact.
Religion or Belief	=	No known impact, data is not gathered.
Sex	+&-	No known impact.
Sexual Orientation	=	No known impact, data is not gathered.
Vulnerable People: <ul style="list-style-type: none"> • 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 	=	<p>The impact on vulnerable groups is not yet known. In order to understand the impact, engagement is taking place with representatives from these groups and a focus on hearing the voice of these groups will be prioritised during the public consultation.</p> <p>There is also work ongoing in education services to proactively support those from disadvantaged backgrounds.</p> <p>The SEND code of practice makes specific provision for children from families in the armed forces as well as other vulnerable groups including children in care and children in the youth justice system. The council is committed to implementing the SEN code of practice.</p>
Health Inequalities (HI) Many issues can have an impact on health: is it an area of deprivation, does every	=	The council service offer excludes services commissioned by the integrated care board. However, in business as usual activity, the council and integrated care board continue to commission health services for children / young people both with and

population group have equal access, unemployment, work conditions, education, skills, our living situation, rural, urban, rates of crime etc		without EHCPs through the continued local area service offer. These include a range of community services supporting children / young people from 0-25 years, including but not limited to community paediatricians, community nursing and community therapies and community mental health services.
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 project is helping to promote the needs of children and young people and with SEND by working with schools and community groups are engaged to share their views.
Advance equality of opportunity: This involves <ul style="list-style-type: none"> removing or minimising 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; 	The proposal is about providing a clear transparent assessment for children and young people who are eligible for transport. By providing this it will enable SEN Home to School transport will be able to deliver services to those children/young people who have protected characteristics within their local community (as their peers receive). By engaging and consulting with the public prior to making any changes, this will ensure the voice of the local community is heard and taken into account.

<ul style="list-style-type: none"> encouraging people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. 	
<p>Foster good relations:</p> <p>This means tackling prejudice and promoting understanding between people from different groups and communities.</p>	<p>In order to develop a new operating model, we engaged with stakeholders prior to, and during the consultation around the proposed service offer changes.</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
Businesses	No	
Councils	No	
Education Sector	Yes	Education settings have statutory duties and the local authority will support them in discharging these duties.
Fire and Rescue	No	
Governance Structures	No	
NHS	No	
Police	No	

Voluntary and Community Sector	No	
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. 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
Impact of proposed change to SEN Home to School transport	Public consultation and analysis <ul style="list-style-type: none"> • online – Ask Warwickshire • paper version 	Consultation is live between Dec 2022 – Feb 2023. Analysis will take place in Feb and March 2023.	Duane Chappell

Impact of proposed change to SEN Home to School transport offer accessible all.	Easy read version of consultation paperwork and supporting documentation.	Consultation is live between Dec 2022 – Feb 2023. Analysis will take place in Feb and March 2023.	Ruth Waterman
Impact of proposed change to SEN Home to School transport offer accessible all.	Consultation information and supporting documentation available in different languages.	Consultation is live between Dec 2022 – Feb 2023. Analysis will take place in Feb and March 2023.	Ruth Waterman
	Face to face drop in sessions	Consultation is live between Dec 2022 – Feb 2023.	Kevin Painting
	Online drop in sessions	Consultation is live between Dec 2022 – Feb 2023.	Kevin Painting

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		
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	Max Beesley
Name and signature of Assistant Director	Scott Tompkins 
Date	02/12/2022
Date of next review and name of person/s responsible	16/01/2022 - Max Beesley

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 WCC colleagues can access.