



# Equality Analysis

**Transport  
Information Centres**

**For Decision Making Items**

May 2019

## **What is the Purpose of the Equality Decision-Making Analysis?**

The Analysis is designed to be used where a decision is being made at Cabinet Member or Overview and Scrutiny level or if a decision is being made primarily for budget reasons. The Analysis should be referred to on the decision making template (e.g. E6 form).

When fully followed this process will assist in ensuring that the decision-makers meet the requirement of section 149 of the Equality Act 2010 to have due regard to the need: to eliminate discrimination, harassment, victimisation or other unlawful conduct under the Act; to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and to foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Having due regard means analysing, at each step of formulating, deciding upon and implementing policy, what the effect of that policy is or may be upon groups who share these protected characteristics defined by the Equality Act. The protected characteristics are: age, disability, gender reassignment, race, sex, religion or belief, sexual orientation or pregnancy and maternity – and in some circumstances marriage and civil partnership status.

It is important to bear in mind that "due regard" means the level of scrutiny and evaluation that is reasonable and proportionate in the particular context. That means that different proposals, and different stages of policy development, may require more or less intense analysis. Discretion and common sense are required in the use of this tool.

It is also important to remember that what the law requires is that the duty is fulfilled in substance – not that a particular form is completed in a particular way. It is important to use common sense and to pay attention to the context in using and adapting these tools.

This process should be completed with reference to the most recent, updated version of the Equality Analysis Step by Step Guidance (to be distributed) or EHRC guidance at

<http://www.equalityhumanrights.com/private-and-public-sector-guidance/public-sector-providers/public-sector-equality-duty>

This toolkit is designed to ensure that the section 149 analysis is properly carried out, and that there is a clear record to this effect. The Analysis should be completed in a timely, thorough way and should inform the whole of the decision-making process. It must be considered by the person making the final decision and must be made available with other documents relating to the decision.

The documents should also be retained following any decision as they may be requested as part of enquiries from the Equality and Human Rights Commission or Freedom of Information requests.

Specific advice on completing the Equality Analysis and advice, support and training on the Equality Duty and its implications is available from the County Equality and Cohesion Team by contacting

Jeanette Binns (Equality and Cohesion Manager) at

[Jeanette.binns@lancashire.gov.uk](mailto:Jeanette.binns@lancashire.gov.uk)

## **Name/Nature of the Decision**

Transport Information Centres

## **What in summary is the proposal being considered?**

Closure of transport information centres at Preston Bus Station, Nelson and Clitheroe interchanges and at Carnforth Railway Station.

Is the decision likely to affect people across the county in a similar way or are specific areas likely to be affected – e.g. are a set number of branches/sites to be affected? If so you will need to consider whether there are equality related issues associated with the locations selected – e.g. greater percentage of BME residents in a particular area where a closure is proposed as opposed to an area where a facility is remaining open.

No, but specific locational impacts on people with protected characteristics.

## **Could the decision have a particular impact on any group of individuals sharing protected characteristics under the Equality Act 2010, namely:**

- Age
- Disability including Deaf people
- Gender reassignment
- Pregnancy and maternity
- Race/ethnicity/nationality
- Religion or belief
- Sex/gender
- Sexual orientation
- Marriage or Civil Partnership Status

In considering this question you should identify and record any particular impact on people in a sub-group of any of the above –

e.g. people with a particular disability or from a particular religious or ethnic group.

It is particularly important to consider whether any decision is likely to impact adversely on any group of people sharing protected characteristics to a disproportionate extent. Any such disproportionate impact will need to be objectively justified.

Yes. The services are particularly popular with older people and people with disabilities.

If you have answered "Yes" to this question in relation to any of the above characteristics, – please go to Question 1.

See question 1

If you have answered "No" in relation to all the protected characteristics, please briefly document your reasons below and attach this to the decision-making papers. (It goes without saying that if the lack of impact is obvious, it need only be very briefly noted.)

NA

## Question 1 – Background Evidence

What information do you have about the different groups of people who may be affected by this decision – e.g. employees or service users (you could use monitoring data, survey data, etc. to compile this).

As indicated above, the relevant protected characteristics are:

- Age
- Disability including Deaf people
- Gender reassignment/gender identity
- Pregnancy and maternity
- Race/Ethnicity/Nationality
- Religion or belief
- Sex/gender
- Sexual orientation
- Marriage or Civil Partnership status (in respect of which the s. 149 requires only that due regard be paid to the need to eliminate discrimination, harassment or victimisation or other conduct which is prohibited by the Act).

In considering this question you should again consider whether the decision under consideration could impact upon specific sub-groups e.g. people of a specific religion or people with a particular disability. You should also consider how the decision is likely to affect those who share two or more of the protected characteristics – for example, older women, disabled, elderly people, and so on.

No specific information but we consider that the services are particularly popular with older people and people with disabilities.

The total number of employees affected is 6.5 at the four transport information centres.

## Question 2 – Engagement/Consultation

How have you tried to involve people/groups that are potentially affected by your decision? Please describe what engagement has taken place, with whom and when.

(Please ensure that you retain evidence of the consultation in case of any further enquiries. This includes the results of consultation or data gathering at any stage of the process)

The consultation asked for views on the proposal to close the council's transport information centres at Preston Bus Station, Nelson Interchange, Clitheroe Interchange and Carnforth Railway Station.

The consultation ran for eight weeks between 5 March 2018 and 29 April 2018.

Paper questionnaires were made available at all four transport information centres, as well as Carnforth Library due to Carnforth Information Centre being closed during part of the fieldwork period. Posters were also used at these venues to publicise the consultation.

The consultation questionnaire was also available online at [www.lancashire.gov.uk](http://www.lancashire.gov.uk).

At the beginning of the consultation 456 stakeholders were contacted to inform them that the consultation had started and advised them how they could participate. Stakeholders included users, district and parish councillors, interest groups, bus operators and others.

Announcements regarding the consultation were regularly made during the fieldwork period via Twitter and Facebook and a press release was produced for the media.

In total, 877 completed questionnaires were returned (553 paper questionnaire responses and 324 online questionnaire responses).

Respondent profiles:

96% of respondents were Lancashire residents.

40% were male and 54% were female whilst 6% preferred not to say – this is a slightly higher representation of females than in the county's population. 1% of respondents identified as Transgender, similar to the level found in many other service consultations.

51% of respondents were aged 65 and over with a further 35% of respondents aged between 35 and 64 and less than 7% of respondents were under 35, the age profile has a higher percentage of older respondents than a number of service consultations.

15% of respondents considered themselves to have a disability or to be a Deaf person which is comparatively high for a service consultation.

There was a comparatively low response from people from BME communities of less than 4% of respondents which is about half of their representation in the

Lancashire population but the location of the Information Centres will be an influential factor.

The responses from Lesbian, Gay and Bisexual respondents were at broadly similar levels to other County Council service consultations and the religion or belief responses were slightly lower than Census details for all categories but there was quite a high "prefer not to say" level of 16%.

A question is included about the number of children and young people under 20 in respondents' households, 72% of respondents had no children or young people under 20 in their household which given the age profile of respondents was to be expected. However 4% of respondents had no children but were expecting which is double the usual rate of response in County Council service consultations.

#### Key Consultation Findings Summarised:

- In the last two years, over two-fifths of respondents have used the transport information centres at Carnforth Railway Station (44%) and Clitheroe Interchange (42%). A quarter of respondents have used the transport information centres at Preston Bus Station (25%) and about one in six respondents have used Nelson Interchange (17%).
- Nine in ten respondents (90%) strongly disagree with the proposal to close the transport information centres and about a further one in twenty (4%) tend to disagree with the proposal. About one in twenty respondents (5%) strongly or tend to agree with the proposal.
- When asked why they agree or disagree with the proposal, respondents explained that the transport information centres act as community hubs that offer a useful/necessary public service (35%) and that not everyone has access to the internet, or is IT literate (21%). In relation to protected characteristics significance, 9% of respondents stated "it was easier for some people to deal with a person (e.g. older or disabled people)".
- When asked how the proposal would impact on them, respondents explained that it would be inconvenient (33%) and that they would lose, or have reduced access to, the services provided by the transport information centres (33%). Of specific reference to protected characteristics groups 5% of respondents indicated "Negative impact on those needing extra help (e.g. disabled, OAP, complex queries, no internet)".
- When asked how they would find out about public transport services or buy tickets if this proposal happened, about two-fifths of respondents say they don't know (39%), a quarter of respondents say they would visit another information centre or ticket office (25%) and about a quarter say they would buy tickets online through a website, smartphone app or by telephone (24%).
- Two thirds (65%) of respondents said they would travel less often if the proposal happened.
- In the consultation there was a question included which gave respondents the opportunity to say why they were satisfied or dissatisfied with the service. It is of relevance to the disability protected characteristic to record that 8% of respondents indicated it was "easiest way to deal with complex travel arrangements (e.g. support for wheelchair users, using multiple operators)".

- In the Any Other Comments Section of the consultation, 7% of respondents also commented that "People (particularly the elderly and disabled) rely on the service".

### **Question 3 – Analysing Impact**

Could your proposal potentially disadvantage particular groups sharing any of the protected characteristics and if so which groups and in what way?

It is particularly important in considering this question to get to grips with the actual practical impact on those affected. The decision-makers need to know in clear and specific terms what the impact may be and how serious, or perhaps minor, it may be – will people need to walk a few metres further to catch a bus, or to attend school? Will they be cut off altogether from vital services? The answers to such questions must be fully and frankly documented, for better or for worse, so that they can be properly evaluated when the decision is made.

Could your proposal potentially impact on individuals sharing the protected characteristics in any of the following ways:

- Could it discriminate unlawfully against individuals sharing any of the protected characteristics, whether directly or indirectly; if so, it must be amended. Bear in mind that this may involve taking steps to meet the specific needs of disabled people arising from their disabilities
- Could it advance equality of opportunity for those who share a particular protected characteristic? If not could it be developed or modified in order to do so?
- Does it encourage persons who share a relevant protected characteristic to participate in public life or in any activity in which participation by such persons is disproportionately low? If not could it be developed or modified in order to do so?

- Will the proposal contribute to fostering good relations between those who share a relevant protected characteristic and those who do not, for example by tackling prejudice and promoting understanding? If not could it be developed or modified in order to do so? Please identify any findings and how they might be addressed.

Proposal may make travel by public transport more difficult for older people and for people with disabilities because other sources of information and tickets are less understandable. Older and disabled people are less likely to use digital alternatives to obtain travel information or tickets. Whilst there are no statistics available about usage of the Information Centres by protected characteristics both the response rate to the consultation and some of the consultation responses do suggest a disproportionate adverse impact on these groups should the Travel Information Centres/Interchanges cease. Two thirds (65%) of respondents said they would travel less often if the proposal happened. If significant numbers of people did feel less able to travel arising from the closure of particular Transport Information Centres, this may lead to a possible potential reduction of those people's ability to participate in public life, reducing their equality of opportunity to travel.

It was also anticipated when the consultation was developed, that there may be concerns about personal safety from some members of protected characteristics groups which would emerge. In the event, a small number of respondents commented on this as a concern. It is likely that having a facility available may deter some instances of hate crime or anti-social behaviour and may assist the fostering of good relations between communities/community cohesion, achieve Public Sector Equality Duty (PSED) aims or may allow people to wait in a safer environment for a bus or train in some cases.

#### **Question 4 –Combined/Cumulative Effect**

Could the effects of your decision combine with other factors or decisions taken at local or national level to exacerbate the impact on any groups?

For example - if the proposal is to impose charges for adult social care, its impact on disabled people might be increased by other decisions within the County Council (e.g. increases in the fares charged for

Community Transport and reductions in respite care) and national proposals (e.g. the availability of some benefits) . Whilst LCC cannot control some of these decisions, they could increase the adverse effect of the proposal. The LCC has a legal duty to consider this aspect, and to evaluate the decision, including mitigation, accordingly.

If Yes – please identify these.

Yes. Public Transport operators (bus and rail) are reducing face to face information and moving towards digital delivery of information and ticketing.
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### **Question 5 – Identifying Initial Results of Your Analysis**

As a result of your analysis have you changed/amended your original proposal?

Please identify how –

For example:

Adjusted the original proposal – briefly outline the adjustments

Continuing with the Original Proposal – briefly explain why

Stopped the Proposal and Revised it - briefly explain

Adjusted original proposal.
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During the consultation period there have been expressions of interest to take over the management/ownership of all of the transport information centres. Consideration was to be given to investigating this interest and maintaining the operation of the information centres whilst doing so.
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April 2019 – Initial consideration has been given to expressions of interest and the outcomes of this activity are to be presented to be Cabinet with regards to reaching a decision on how to proceed further.
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### **Question 6 - Mitigation**

Please set out any steps you will take to mitigate/reduce any potential adverse effects of your decision on those sharing any particular protected characteristic. It is important here to do a genuine and realistic evaluation of the effectiveness of the mitigation contemplated.

Over-optimistic and over-generalised assessments are likely to fall short of the “due regard” requirement.

Also consider if any mitigation might adversely affect any other groups and how this might be managed.

If any of the expressions of interest are assessed as sustainable, there may be an opportunity to maintain these services.

April 2019 – Expressions of interest have been considered with a view to establishing options to sustain the service and mitigate adverse impact as a result of any closure. The outcomes of the initial assessment and consideration of other proposals is being put to Cabinet for a decision on next steps.

### **Question 7 – Balancing the Proposal/Countervailing Factors**

At this point you need to weigh up the reasons for the proposal – e.g. need for budget savings; damaging effects of not taking forward the proposal at this time – against the findings of your analysis. Please describe this assessment. It is important here to ensure that the assessment of any negative effects upon those sharing protected characteristics is full and frank. The full extent of actual adverse impacts must be acknowledged and taken into account, or the assessment will be inadequate. What is required is an honest evaluation, and not a marketing exercise. Conversely, while adverse effects should be frankly acknowledged, they need not be overstated or exaggerated. Where effects are not serious, this too should be made clear.

The council is in a position where it needs to make substantial budget savings and, whilst this proposal will have a negative impact on people with protected characteristics, it is considered necessary to make this service reduction.

However, if consideration is given to the expressions of interest and there any are considered to be sustainable, there may be an opportunity for this service to continue. Should that not be the case, older and disabled people may be particularly adversely impacted by this proposal.

April 2019 – Full consideration has been given to all expressions received and an initial assessment undertaken with regards to the gravitas and financial viability of the initial proposals. This is to ensure that appropriate assurances are given to the continuation and sustainability of the service through an alternative proposal.

## Question 8 – Final Proposal

In summary, what is your final proposal and which groups may be affected and how?

Explore expressions of interest so that and consideration can be given to handing over responsibilities to these interested parties.

April 2019 – A recommendation is made to the Cabinet to proceed to cease the services provided by the Council in line with Cabinet resolutions but supports the transition of current operations to two Community Rail Partnership groups for Clitheroe and Carnforth Transport Information Centres.

## Question 9 – Review and Monitoring Arrangements

Describe what arrangements you will put in place to review and monitor the effects of your proposal.

Involvement in the expressions of interest process. Further arrangements to be identified.

April 2019 – The service will work closely with any potential party identified to transition services effectively.

Equality Analysis Prepared By Asima Mister

Position/Role Transportation Officer

Equality Analysis Endorsed by Line Manager and/or Service Head

Decision Signed Off By

Cabinet Member or Director

**Please remember to ensure the Equality Decision Making Analysis is submitted with the decision-making report and a copy is retained with other papers relating to the decision.**

For further information please contact

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Thank you