

Equality Impact Report

Title of proposal	Consultation on Concessionary Rail Travel for Older People
Date of implementation	December 2019
EIR completed by Name: Tel:	Jo Kenworthy /

1. Background

The County Council has a statutory duty to administer the English National Concessionary Travel Scheme (ENCTS) in West Sussex. ENCTS provides statutory free off peak bus travel for eligible older and disabled people.

In addition the council also provides a number of discretionary enhancements to the scheme in West Sussex, including a free Senior Railcard as an alternative to the bus pass for eligible older people. Due to the council's financial constraints, it is proposed to remove the free Senior Railcard offer from the scheme in West Sussex.

A public consultation was carried out from 24 October until 4 December 2019 to gather feedback from passengers and others to help us understand the impact of our proposal.

Equality duty

The Equality Act (2010) mandates a duty within public bodies to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and those who do not share it.

To meet the equalities duty set by the Equality Act (2010), authorities are required to analyse the impact of proposed policies, strategies and action plans across all of the protected groups.

In this Equality Impact Assessment, we evaluate the impact of our proposal to anticipate and avoid any discriminatory or negative consequences for a particular group, on the grounds of:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race (including ethnic origin, nationality)
- Religion or belief (including lack of belief)
- Sex/Gender
- Sexual orientation

In accordance with the Equality Act, the consultation included an equality monitoring section as part of the survey questionnaire.

Whilst the consultation was available for all West Sussex residents, Senior Railcard users funded by the County Council were contacted directly by letter. Other interested parties were also engaged, including libraries, parish councils, GP surgeries, Your Voice e-Panel, Age UK, Disability Access Forums and other organisations representing people with protected characteristics.

Senior Railcards funded by the County Council

Around 157,000 older people in West Sussex choose to receive their free bus pass – but around 2,200 older people choose to receive a free Senior Railcard instead. This entitles the holder to one-third off their rail travel anywhere in the UK.

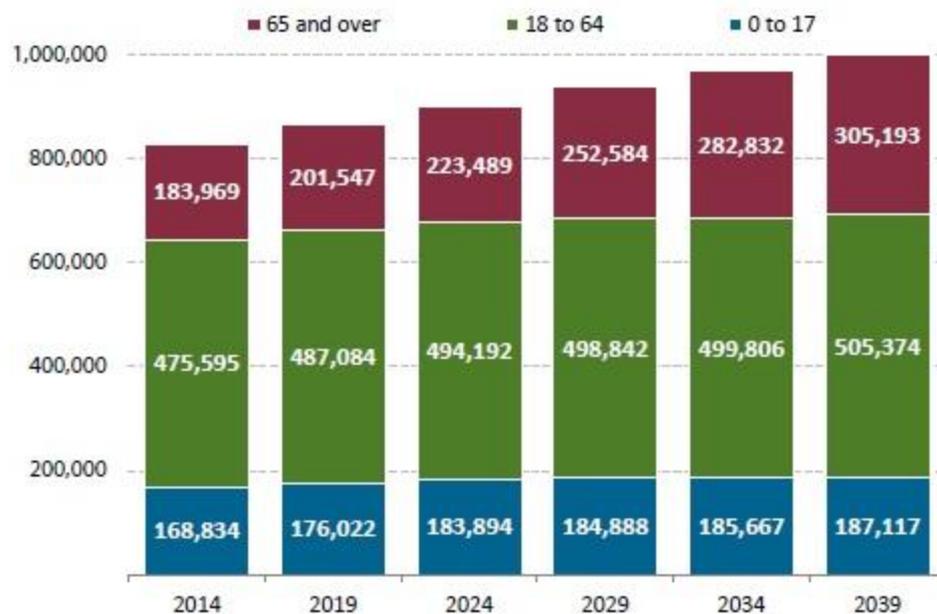
As things stand, approximately 77% of the eligible population take up the Older Person’s Bus Pass with just 1% opting for the Senior Railcard.

Age

West Sussex has a disproportionate number of elderly residents – around 18.2% of the UK population are aged 65 years or over, compared to 22.3% of the local West Sussex population ([West Sussex Life 2017-19](#)).

The graph below shows how the 65 and over age group is expected to steadily increase in the years ahead.

West Sussex projected population by age group, 2014-2039



Source: ONS Sub-National Population Projections, Tables Z3-Z7

Government statistics show that rail use decreases steadily after retirement age ([National Travel Survey 2018](#)). This trend is evident in the consultation responses. Of those with a Senior Railcard provided by the County Council, the highest proportion were in the 65-74 age category (77%), followed by 75-84 (19%). There were just 5 respondents with a Senior Railcard who were aged 85 plus.

The consultation questionnaire asked respondents to tick as many reasons for choosing the railcard option as were applicable. The most commonly cited reasons for those aged 65 and older (the majority of respondents) were 'I use trains more frequently than buses', followed by 'I do not travel on buses at all' and 'It is more convenient'.

21% of respondents aged 65 and over stated that they chose the railcard option because they did not have a local bus service available to them.

Access to services in rural areas is likely to become more difficult as the population ages and becomes more dependent on already strained rural public transport links. While the towns of West Sussex are generally well connected, some rural parts of the county remain relatively isolated from the main transport networks of the South East.

Disability

According to 2011 Census data, 17% of the population of West Sussex has day to day activities limited by a long-term health problem or disability, which is similar to the national average.

The County Council provides discretionary free bus travel for [eligible disabled people](#) with no time restrictions and free travel for a companion who accompanies them at peak times, as well as the alternative of a free Disabled Person's Railcard. These enhancements are not included in this proposal and will remain as part of the council's offer to eligible residents.

Nevertheless, the consultation received a relatively high number of respondents (23%) who considered that they had a disability or long-term illness. It is noted that physical disability and frailty increase with age. Residents who do not currently qualify for a Disabled Person's Bus Pass (including the Disabled Person's Railcard option) may do so in the future.

However, the most commonly cited reasons for taking up the Senior Railcard option were the same for disabled and non-disabled respondents: 'I use trains more frequently than buses', followed by 'I do not travel on buses at all' and 'It is more convenient'.

31% of all respondents who considered themselves to have a disability or long-term illness cited 'It is the best option for my mobility requirements'.

Gender

National statistics show that, year on year, more women than men travel by bus and more men than women travel by rail ([2018 WBG Briefing: Public Transport and Gender](#)).

Current take up of the free Senior Railcard option in West Sussex has a gender split as follows: 52.2% male and 47.8% female, despite there being more females than males in the 65 and over age category.

(The gender split in West Sussex is roughly equal for all age groups up until the 65 year group at which is the first point where there are over 3,000 more women in each 5 year age gap, with there being over 8,000 more women aged 85 and over than men.)

The gender split was even further apart in the consultation responses; of those with a Senior Railcard who provided information about their gender, 57% were male and 43% were female.

However, the most commonly cited reasons provided for taking up the Senior Railcard option were the same for male and female respondents: 'I use trains more frequently than buses', 'I do not travel on buses at all' and 'It is more convenient'.

The only reason which received a higher number of female responses than male was 'I do not have a local bus service available to me' (53% female to 47% male). However it was only the fifth most commonly cited reason for women to choose the Railcard option.

Race (including, ethnic origin, nationality)

The overwhelming majority of respondents described themselves as White, with almost 81% identifying as White British and almost 3% as White Other. Just four respondents defined as Black, Asian or Minority Ethnic (BAME), one as 'Mixed' and one as 'Other'. 16% of respondents did not provide an answer to the question.

Minority ethnic groups are largely concentrated in Crawley and in coastal towns such as Bognor Regis, Littlehampton and Worthing, which are served by local buses and therefore the railcard option is likely to be less popular.

Religion or Belief

Sexual orientation and gender reassignment

Of the consultation responses, only 15 people stated that they followed a religion other than Christianity (the highest answer in this category, followed by 'No religion').

Similarly, the consultation received just 10 responses from people identifying as Lesbian, Gay, Bisexual or other, and there were 2 respondents who stated that their gender was not the same as the one assigned to them at birth.

Therefore it is hard to gauge much from this sample, along with the fact that around a quarter of respondents declined to answer to the question in both categories.

Marriage and civil partnership

Pregnancy and maternity

No data was collected for these categories as they are not applicable to this consultation.

2. Describe any negative impact for customers or residents.

There will be no changes to rail services or products as a result of this proposal. The Senior Railcard will continue to be available for residents to purchase independently from national rail stations or online, currently £30 per year or £70 for three years.

Accordingly, 'increased cost' was the most commonly cited impact mentioned by consultation respondents, most of whom had reached State Pension age.

We know poverty and public transport are linked, see [Transport and Poverty: a Review of the Evidence, UCL 2014](#). West Sussex data shows that we have a number of geographical areas of deprivation where there is perhaps a greater need for transport services for those who cannot afford cars.
https://www.westsussex.gov.uk/media/3075/8_deprivation.pdf

We will take this information into account when considering our proposed change in order to promote equality of opportunity and consider the impact on people's ability to access services and reduce isolation. Our ongoing work with partners will seek to enhance the community transport offer and other alternatives for those residents.

3. Describe any positive effects which may offset any negative impact.

If the proposal goes ahead, eligible residents will be able to take up their free Older Person's Bus Pass entitlement. As a result some residents may be encouraged to consider bus travel instead of driving, which could have health benefits and reduce isolation as they get older. [Future of Transport in an Ageing Society \(2015, Age UK\)](#)

If mitigation is necessary and can be put in place, e.g. increased community transport, some residents - particularly older and disabled people - could gain access to passenger transport that they did not have before.

4. Describe whether and how the proposal helps to eliminate discrimination, harassment and victimisation.

Where impacts have been identified, work will be undertaken to mitigate these in partnership with community transport providers and local councils on the provision of alternative transport options wherever possible.

Our work with partners, through the instigation of Enhanced Bus Partnerships and the development of sustainable community transport solutions, will allow us to promote travel alternatives for those residents who may experience reduced transport opportunities and those with protected characteristics in particular. Disability access groups, age organisations, community groups and other key stakeholders will be actively engaged as part of this process.

5. Describe whether and how the proposal helps to advance equality of opportunity between people who share a protected characteristic and those who do not.

See 4 above.

Furthermore, by retaining the discretionary enhancements for eligible disabled people as part of the council's offer, the proposal protects the equality of opportunity available to those residents.

6. Describe whether and how the proposal helps to foster good relations between persons who share a protected characteristic and those who do not.

By encouraging older residents to take up their bus pass entitlement – and retaining the discretionary enhancements for disabled people – the County Council supports the needs of all bus users including disabled and older people, and aims to support services and infrastructure that can be used by a wide variety of users who may have different needs.

This will be actively pursued through the development of Enhanced Partnerships and our work with partners to develop travel solutions that are equitable and accessible (see 4 above).

7. What changes were made to the proposal as a result? If none, explain why.

None.

8. Explain how the impact will be monitored to make sure it continues to meet the equality duty owed to customers and say who will be responsible for this.

A project plan will be developed to follow up, and implement where possible, actions that may mitigate the effects of the decision. As part of this, the Transport Bureau will ensure that the impact is monitored to ensure the equality duty is met accordingly.

To be signed by an Executive Director or Director to confirm that they have read and approved the content.

Name	Matt Davey	Date	02 June 2020
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Your position	Director Highways, Transport and Planning
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