

## Equality Impact Analysis (EIA) Resident/Service User

<b>1. Details of function, policy, procedure or service:</b>	
Title of what is being assessed: Revised assessment criteria for Disabled Persons Freedom Pass	
Is it a new or revised function, policy, procedure or service? Service	
Department and Section: Commissioning Group, Parking	
Date assessment completed: 17/11/2016	
<b>2. Names and roles of people completing this assessment:</b>	
Lead officer	Sam Pandya
Stakeholder groups	Disabled Persons, third sector organisations, internal departments (Barnet Learning Disability Service, Adults and Children's Services)
Representative from internal stakeholders	Barnet Communications Team, Adults and Communities Team, 0-25 team, Barnet Learning Disability Service, Mental Health Team
Representative from external stakeholders	
Delivery Unit Equalities Network rep	Lesley Holland
Performance Management rep	
HR rep (for employment related issues)	
<b>3. Full description of function, policy, procedure or service:</b>	
Please describe the aims and objectives of the function, policy, procedure or service. The vision for the Disabled Persons Freedom Pass application and renewals process is for an accessible exemplar high quality process that provides the best user experience possible for our residents. The aim of the project is to ensure the Disabled Persons Freedom Pass process within Barnet adheres to the Department for Transport guidance and Section 240 of the Greater London	

Authority Act 1999 as amended by section 151 the Transport Act 2000.

To achieve this our proposals include an expansion of acceptable documents to support an application, reviewing the way an individual can apply for a Disabled Persons Freedom Pass and making documents more accessible for users. The Council recognises that in order to deliver an excellent service, good access to the process is crucial. The Council has committed to continue including third sector organisations, service users and subject matter specialists in any service developments or proposed changes that could have an impact on any service user.

Following the review, a revised assessment criteria has been developed which aligns more closely to the legislation and provides a fairer and robust procedure.

The project will affect those who already hold a Disabled Persons Freedom Pass and those who are considering applying for a pass by the types of evidence Barnet council will accept as proof of the applicant's recognised disability.

The revised criteria will also align more closely with other London Boroughs providing a more uniform service around London.

In assessing the equalities impact of these proposals we have taken account of the nine protected characteristic outlined in the 2010 equalities act and the additional categories identified by Barnet council e.g. those on low wage, single parent families, people who are unemployed, people who are on benefit. We have also used evidence about existing pass holders and new applicants.

<p><b>How are the equality strands affected?</b> <i>Please detail the effects on each equality strand, and any mitigating action you have taken so far. Please include any relevant data. If you do not have relevant data please explain why.</i></p>			
Equality Strand	Affected?	Please explain how affected	What action has been taken already to mitigate this? What further action is planned to mitigate this?
1. Age	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<p>Through review of the databases, 1358 Disabled Persons Freedom Pass holders to date (November 2016) will be transferred to Older Persons Freedom Pass. This will have no difference to pass holders because the use criteria are the same and the renewal process for an Older Persons Freedom Pass is automatic.</p> <p>The outcome of the review will also result in a more thorough database checking which will mean persons who are eligible for an Older Persons pass will be transferred as soon as they become eligible.</p>	<p>Once assessment criteria are approved by committee following the December 2016 Policy &amp; Resources Committee meeting, Letters will be sent to all those pass holders who will be transferred at the next renewal date or if they replace their pass before their next renewal.</p> <p>Weekly database checks will be completed so persons are transferred to the older persons pass when they become eligible.</p>
2. Disability	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<p>Changes in the assessment criteria and the evidence required for proof of eligibility may affect some people with mental health conditions and learning disabilities/autism.</p> <p>The council recognises that historically, Barnet had interpreted an 'eighth criterion' from the Department for Transport (DfT) Guidance which it has referred to as 'Mental Health'. Therefore a number of pass holders have been granted a pass under this criterion.</p>	<p>The changing criteria will be brought to the attention of all pass holders outlining the new standard of evidence required.</p> <p>Any change in eligibility will be discussed on a one-to-one basis with existing pass holders.</p> <p>The proposed criteria incorporates Mental Health conditions within the Department for Transport Category of '<i>Refused a driving licence, other than on the grounds of persistent misuse of drugs or alcohol</i>' which allows applicants suffering as described in the</p>

			<p>DfT guidance thus fully adhering to the seven recognised disabilities.</p> <p>During the consultation Barnet voice for mental health were consulted with to explain the category and legislation which the council is bound by. Members of Barnet voice were invited to present any questions to the team via the email, phone and at the meetings</p> <p>Applicants with autism will be advised of the evidence requirements for learning disabilities.</p>
3. Gender reassignment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Not known no data	
4. Pregnancy and maternity	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Not known. It is possible that pass holders will be pregnant no impact anticipated.	
5. Race / Ethnicity	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No data available on pass holders.  We do not anticipate any negative impact on this ground.	
6. Religion or belief	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No data available on pass holders.  We do not anticipate any negative impact on this ground.	
7. Gender / sex	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No data available on pass holders.  We do not anticipate any negative impact on this ground.	
8. Sexual orientation	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	No data available on pass holders.  We do not anticipate any negative impact on this ground.	
9. Marital Status	Yes <input type="checkbox"/>	No data available on pass holders.	

	No <input checked="" type="checkbox"/>	We do not anticipate any negative impact on this ground.	
<p><b>10. Other key groups?</b></p> <p>Carers</p> <p>People with mental health issues</p> <p>Some families and lone parents</p> <p>People with a low income</p> <p>Unemployed people</p>	<p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>Yes <input checked="" type="checkbox"/></p> <p>No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p> <p>Yes <input type="checkbox"/></p> <p>No <input checked="" type="checkbox"/></p>	<p>The council recognises that historically, Barnet had interpreted an 'eighth criterion' from the Department for Transport (DfT) Guidance which it has referred to as 'Mental Health'. Therefore a number of pass holders have been granted a pass under this criterion.</p>	<p>The proposed criteria incorporates Mental Health conditions within the Department for Transport Category of '<i>Refused a driving licence, other than on the grounds of persistent misuse of drugs or alcohol</i>' which allows applicants suffering as described in the DfT guidance thus fully adhering to the seven recognised disabilities.</p> <p>During the consultation Barnet voice for mental health were consulted with to explain the category and legislation which the council is bound by. Members of Barnet voice were invited to present any questions to the team via the email, phone and at the meetings.</p>

Young people not in employment education or training	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		
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<p><b>4. What will be the impact of delivery of any proposals on satisfaction ratings amongst different groups of residents?</b></p>
<p>There might be a perception of negative impact if the community considered that Barnet was withdrawing a benefit from vulnerable residents.</p>
<p><b>5. How does the proposal enhance Barnet’s reputation as a good place to work and live?</b></p>
<p>No impact anticipated.</p> <p>The project will provide a better quality and more effective service for users which is fairer and will ensure those who require the service can access it. It will be robust and align more closely with legislation to prevent fraud and also ensure there is suitable support and guidance for those who are wishing to apply or renew their pass.</p> <p>Improvements to the current processes will also take place to ensure that the service user is able to apply or renew a Disabled Persons Freedom Pass with ease.</p> <p>Three quarters of Barnet residents (74 per cent) are satisfied with how Barnet Council runs things.</p>
<p><b>6. How will members of Barnet’s diverse communities feel more confident about the council and the manner in which it conducts its business?</b></p>
<p>The revised process will be open, transparent and robust which will ensure members of Barnet’s diverse communities the process is fair and consistent for all members of the community.</p>
<p><b>7. Please outline what measures and methods have been designed to monitor the application of the policy or service, the achievement of intended outcomes and the identification of any unintended or adverse impact? <i>Include information about the groups of people affected by this proposal. Include how frequently the monitoring will be conducted and who will be made aware of the analysis and outcomes? This should include key decision makers. Include these measures in the Equality Improvement Plan (section 16)</i></b></p>
<p>The results of the consultation will be displayed on the Engage Barnet page for the Disabled Persons Freedom Pass consultation. Further links to the legislation and additional information will be provided here for residents to view.</p> <p>Additional informative documents will be available to accompany applicant form to provide applicants with information on what evidence Barnet council will accept as proof of a recognised disability.</p> <p>It is proposed to collect information on the nine protected characteristics at application and renewal stage. It is planned to use this information to monitor for equalities.</p>

Regular monitoring via London Councils CMS system will take place for regular residency checks, entitlement checks and those entering and leaving the borough. Pass holders will be written to in prior to their entitlement awards expiring, ensuring users have sufficient time to obtain updated information to prove their eligibility.

**8. How will the new proposals enable the council to promote good relations between different communities?** *Include whether proposals bring different groups of people together, does the proposal have the potential to lead to resentment between different groups of people and how might you be able to compensate for perceptions of differential treatment or whether implications are explained.*

The review has built relationships with those who may be affected and in turn this will provide a point of contact for queries and support.

**9. How have employees and residents with different needs been consulted on the anticipated impact of this proposal? How have any comments influenced the final proposal?** *Please include information about any prior consultation on the proposal been undertaken, and any dissatisfaction with it from a particular section of the community. Please refer to Table 2*

A formal consultation was carried out for six weeks between 26 September 2016 - 4 November 2016 which endorsed the councils approached and where possible that feedback has influenced the proposals.

The consultation results show that on average 53% of respondents supported the changes for each of the categories of disabilities. These results include the views from service users, residents, third sector groups and organisations and community groups.

Of those who responded to the consultation 80% (238 out of 376) were Disabled Persons Freedom Pass holders.

Based on the consultation results on the methods used for accessing the service, further improvement to documents, alternative formats and monitoring will be carried out. Improved forms and guidance will be developed with users to ensure to service is

The consultation was advertised online at Engage Barnet(link), local media, Twitter and Facebook, as well as which were distributed to voluntary organisations, Housing Estates, Police Stations, Libraries and prominent London Borough of Barnet Buildings and adult day centres.

All Disabled Persons Freedom Pass holders were written to inviting them to take part in the consultation.

To ensure stakeholders and residents had sufficient levels of support, library drop-in sessions were held to explain the proposals in detail and provide additional support in completing the questionnaire.

The table below shows the dates and times of the library drop-in sessions.

Location	Date	Times
Hendon Library	30 September 2016	10am - 12pm 2 - 4pm

<b>North Finchley Library</b>	<b>3 October 2016</b>	<b>10am - 12pm 2 - 4pm</b>
<b>Chipping Barnet Library</b>	<b>11 October 2016</b>	<b>10am - 12pm 2 - 4pm</b>
<b>Burnt Oak Library</b>	<b>19 October 2016</b>	<b>10am - 12pm 2 - 4pm</b>
<b>Golders Green Library</b>	<b>27 October 2016</b>	<b>10am - 12pm 2 - 4pm</b>
<b>Edgware Library</b>	<b>3 November 2016</b>	<b>10am - 12pm 2 - 4pm</b>

Third sector organisations and community groups were also invited to take part in the consultation and other key stakeholders. The groups shown in the table below accepted the opportunity for the team to meet with them or at a prearranged group meeting.

<b>Name of Organisation</b>	<b>Date</b>
Community Barnet	19/09/2016
Barnet African Caribbean Association	20/09/2016
Barnet Older Asian Association	20/09/2016
Barnet Voice for Mental Health	20/09/2016
Barnet People's Choice	20/09/2016
Age UK	06/10/2016
Mencap	10/10/2016
Met Police	10/10/2016
Inclusion Barnet	11/10/2016
Barnet Asian Elders Association	13/10/2016
Space 2 B	28/10/2016
Barnet Voice for Mental Health AGM	31/10/2016
Volunteering Matters	02/11/2016
Learning Disability Parliament	03/11/2016

## Overall Assessment

10. Overall impact		
Positive Impact  <input type="checkbox"/>	Negative Impact or Impact Not Known <sup>1</sup>  <input checked="" type="checkbox"/>	No Impact  <input type="checkbox"/>

11. Scale of Impact		
Positive impact:  Minimal <input type="checkbox"/> Significant <input type="checkbox"/>	Negative Impact or Impact Not Known  Minimal <input checked="" type="checkbox"/>  Significant <input type="checkbox"/>	

12. Outcome			
No change to decision  <input checked="" type="checkbox"/>	Adjustment needed to decision  <input type="checkbox"/>	Continue with decision <i>(despite adverse impact / missed opportunity)</i>  <input type="checkbox"/>	If significant negative impact - Stop / rethink  <input type="checkbox"/>

<sup>1</sup> 'Impact Not Known' – tick this box if there is no up-to-date data or information to show the effects or outcomes of the function, policy, procedure or service on all of the equality strands.

**13. Please give full explanation for how the overall assessment and outcome was decided.**

Satisfied that the revised criteria, applications and renewals process have achieved the project objective of a fair and robust process. The review should result in positive change for most of the applicants and pass holders. It has also highlighted a potential minimal negative impact for people with autism and mental health conditions if they are unable to demonstrate that they meet the new eligibility criteria.

All pass holders will be reassessed when the new proposals are implemented and advised on the evidence required for continuing eligibility. Where people no longer meet the eligibility criteria they will be advised of the appeal process and all action will notified to them in an appropriate manner. Any change in eligibility will be communicated on a one-to-one basis with existing pass holders.

The proposed application and renewals process is justified because it/is

- Meets the government requirements
- Subject to full consultation which reflects the diversity of disabilities in the pas holders
- Uses evidence to identify any potential negative impacts
- Adopts a sensitive and supportive approach with pass holder's to explore continuing eligibility

Therefore no change is required to the recommendation to adopt the proposed new applications and renewals process.

## 14. Equality Improvement Plan

Please list all the equality objectives, actions and targets that result from the Equality Analysis (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Objective	Action	Target	Officer responsible	By when
Fair and robust process	Monitor applications and rejections collect and record evidence by the nine protected characteristics	Whether certain groups are negatively impacted	CSG	Process begins: April 2017
	Everyone will be reassessed when the new proposals are implemented and advised on the evidence required for continuing eligibility. Where people no longer meet the eligibility criteria they will be advised of the appeals process and all action will notified to them in an appropriate manner. Any change in eligibility will be discussed on a one-to-one basis with existing pass holders	To demonstrate a fair and consistent process	CSG	Process begins: April 2017
Make people aware of the new process	Web page, stakeholder and community notifications	Promoting knowledge and awareness of the new system		December 2016 – April 2017
Fair and accessible treatment for people with disabilities	Enhanced disability awareness for staff operation the new arrangements	To treat disabled customers equally making any adjustment required	CSG	Begin December 2016 fully implemented before the new arrangements

<p><b>1<sup>st</sup> Authorised signature (Lead Officer/Project Sponsor)</b></p>  <p><b>Sam Pandya</b></p>	<p><b>2<sup>nd</sup> Authorised Signature (Service lead/Project Manager)</b></p>  <p><b>Jamie Blake</b></p>
<p><b>Date: 18/11/2016</b></p>	<p><b>Date: 18/11/2016</b></p>