

**Annex C City of York Council  
Equalities Impact Assessment**

**Who is submitting the proposal?**

<b>Directorate:</b>		Place	
<b>Service Area:</b>		Transport	
<b>Name of the proposal :</b>		Changes to CYC Supported Bus Services	
<b>Lead officer:</b>		Joanne Waddington	
<b>Date assessment completed:</b>		25 <sup>th</sup> January 2024	
<b>Names of those who contributed to the assessment :</b>			
<b>Name</b>	<b>Job title</b>	<b>Organisation</b>	<b>Area of expertise</b>

**Step 1 – Aims and intended outcomes**



<b>1.1</b>	<b>What is the purpose of the proposal?</b> Please explain your proposal in Plain English avoiding acronyms and jargon.
	<p>Changes are proposed to some bus services that currently receive public subsidy via the council. The purpose of the proposals is to help stabilise the York bus network and ensure it is affordable and efficient in the face of rising operating costs and post-Covid changes in demand. The nature of the proposals varies between frequency reductions, timetable or operating hour changes or reductions, route changes, and/or route mergers.</p> <p>The bus services affected by the proposals are:</p> <ul style="list-style-type: none"> <li>1 between Chapelfields - City – Wigginton, run by First</li> <li>11 between Bishopthorpe - City – Heworth, run by First</li> <li>12 between Foxwood - City - Monks Cross, run by EYB</li> <li>13 between Copmanthorpe - City - Haxby, run by Connexions</li> <li>14 between Foxwood - City - Haxby, run by Transdev</li> <li>16 between Acomb - Hamilton Drive – City, run by Connexions</li> <li>19 between Skelton - Burton Stone Lane - City, run by Transdev</li> <li>24 between Acomb and city centre, run by Transdev</li> <li>25 between Fulford - City - Foss Islands - Derwenthorpe, run by Transdev</li> <li>26 between Fulford - City - South Bank, run by Transdev</li> </ul> <p>At a high level, the proposed changes affecting each of the services listed above can be summarised as follows:</p>

Bus route	Service to be merged with another	Proposed change				
		Reduced route length	Increased route length	Reduced frequency	Reduced operating hours	Timetable changes
1					✓	✓
11			✓	✓		✓
12						
13		✓				
14						✓
16			✓	✓		✓
19				✓		✓
24			✓			✓
25			✓			✓
26	✓					

Overall, an estimated £200k is expected to be saved by making the changes outlined above. It is expected that this full amount will be needed to offset increased costs on other subsidised bus services with contracts due to expire and be re-tendered in 2024, given that these have not been market tested for 3+ years during which high levels of inflation have significantly increased bus operating costs.

<b>1.2</b>	<b>Are there any external considerations?</b> (Legislation/government directive/codes of practice etc.)
	No

<b>1.3</b>	<b>Who are the stakeholders and what are their interests?</b>
	<ol style="list-style-type: none"> <li>1. Current and future bus users who use (or may have planned to use) the affected bus services.</li> <li>2. Elected representatives whose constituents are affected by the proposed changes.</li> <li>3. Bus operators who are contracted and subsidised to run the services.</li> <li>4. Members of the York Enhanced Bus Partnership groups who represent bus users and operators.</li> <li>5. Members of the York Bus Forum who represent current and potential bus users.</li> </ol>

<b>1.4</b>	<b>What results/outcomes do we want to achieve and for whom?</b>
	<p>The purpose of the proposals is to help stabilise the York bus network and ensure it is affordable and efficient in the face of rising operating costs and post-Covid changes in demand. By making these changes, which have been kept to a minimum, CYC expects to save an estimated £200k. It is expected that these savings will be needed to offset rising contract prices for other more better-used or more socially necessary bus services which are due to be re-tendered in 2024, having not been market tested for several years and against a backdrop of high inflation in recent years.</p>

## **Step 2 – Gathering the information and feedback**

2.1	<p><b>What sources of data, evidence and consultation feedback do we have to help us understand the impact of the proposal on equality rights and human rights?</b> Please consider a range of sources, including: consultation exercises, surveys, feedback from staff, stakeholders, participants, research reports, the views of equality groups, as well your own experience of working in this area etc.</p>
Source of data/supporting evidence	Reason for using
Public consultation results (21/12/23 to 17/1/24)	<p>A public consultation was undertaken between 21/12/23 and 17/01/24 to gather information regarding the impact the proposals would have on people and to understand if there's anything we could do to mitigate any negative impacts arising.</p> <p>The consultation was hosted on the council's consultation web page. At the launch, it was promoted via a news release and regularly throughout the consultation period via all the council's social media channels. In addition, over 150 posters advertising the consultation and displaying QR code links to the survey were placed at bus stops on the affected routes. These same posters were displayed in all York libraries, where paper copies of the survey were also available. In addition, all York's ward councillors received an email outlining the purpose of the consultation and details of how they and their constituents could have a say. All members of the York Enhanced Partnership Bus Forum were also notified via email at the start of the consultation of the details and purpose, and how they could participate. A letter was mailed out to over 500 addresses within the vicinity of the most significant proposed change to specifically alert this group of people and give them the opportunity to have a say. In-person drop-in sessions were provided on the 8<sup>th</sup> and 10<sup>th</sup> of January 2024 at the fully accessible Friargate Quaker Meeting House in York city centre to coincide with consultation events also been run in relation to the York Local Transport Strategy. Finally, all</p>

York's ward councillors were invited to attend two drop-in sessions (one in-person and one online) with officers, to ask questions and/or share their views on the proposals.

A good response to the consultation was received. Over 1,100 people engaged with the online survey or by completing a paper version or submitting other written representations. This is in addition to approximately 15-20 people attending the in-person drop-in sessions specifically to talk about the proposals and around 10 ward councillors joining the drop-in sessions arranged just for them. Some councillors also submitted email queries and feedback from their constituents. A written response was also submitted by the York Bus Forum.

As was to be expected, the vast majority of responses received expressed concerns or objections to any reductions in route coverage, service frequencies, or operating hours. The most frequently cited concern was the impact on the elderly or those with mobility impairments where the proposals would necessitate a longer walk to the nearest bus stop. Concern was also raised that a reduction in bus frequencies or operating hours could prevent people from accessing education, jobs, social/leisure opportunities, or services. A large number of respondents also noted the council's policy is to encourage more people to make trips via bus and that making any reductions to provision is therefore contrary to council policy.

In response to the consultation, a petition was submitted with specific regard to the proposed removal of the 'Flaxman Croft Loop' for the route of the number 13 bus service. The petition was conducted via [www.change.org](http://www.change.org) and promoted via Facebook community groups,

	gaining 400 signatures from people across the country, with 15 signatories adding comments which mostly raised concerns change about the accessibility impacts of the proposed con behalf of elderly and young people.
Bus patronage and cost per passenger data	The council's sustainable transport team has access to long-term data regarding bus service patronage, which allows officers to identify services with very low usage levels (as well as those which have the potential to be delivered commercially). Patronage data combined with bus service contract costs enables the council to calculate the subsidy cost per passenger to be calculated and determine whether this is in line with council policy and offers good value for money.
York Bus Network Review report – this was prepared by consultants, Momentum, between September and December 2023	In late summer 2023, the council commissioned consultants, Momentum, to undertake a review of the York bus network. This exercise identified key areas where the current bus network could be made more accessible, efficient, reliable, improved, or termini changed to increase reliability. The findings of the report informed the proposed changes, but will also provide an evidence base for future transport planning and highways development control

### Step 3 – Gaps in data and knowledge



<b>3.1</b>	<b>What are the main gaps in information and understanding of the impact of your proposal? Please indicate how any gaps will be dealt with.</b>		
<b>Gaps in data or knowledge</b>		<b>Action to deal with this</b>	
Latent demand for bus use if services were more frequent, reliable or had longer operating hours.		Review of studies and reports, plus review of the results of the recent York Local Transport Strategy consultation results.	

### Step 4 – Analysing the impacts or effects.

<b>4.1</b>	<b>Please consider what the evidence tells you about the likely impact (positive or negative) on people sharing a protected characteristic, i.e. how significant could the impacts be if we did not make any adjustments? Remember the duty is also positive – so please identify where the proposal offers opportunities to promote equality and/or foster good relations.</b>		
<b>Equality Groups and Human Rights.</b>	<b>Key Findings/Impacts</b>	<b>Positive (+) Negative (-) Neutral (0)</b>	<b>High (H) Medium (M) Low (L)</b>
<b>Age</b>	Older people, especially those with mobility impairments, may struggle to walk increased distances to their nearest bus stop. This could reduce their ability to travel independently and therefore increase isolation, loneliness, and reduced access to services for this group. Alternatively, it could increase reliance on more expensive forms of transport such as taxis. Older people traditionally make-up a large proportion of bus users, although post-Covid bus usage has declined in the over 65s.	-	M

	Young people who are not old enough to drive or who don't have access to their own car may be especially impacted by timetable changes, reduced frequencies or reduced operating hours as this could reduce opportunities for accessing work, education or training, particularly where journeys require interchange between public transport services or modes. Reduced operating hours could also have a particular impact on younger people's access to social and leisure opportunities, potentially contributing to a sense of isolation and loneliness. Reduced bus service provision may also prohibit young people from travelling independently, increasing reliance on lifts.		
<b>Disability</b>	People living with a disability would be particularly adversely impacted by having to travel longer distances to reach their nearest bus stop. In the context of these proposals, this is particularly an issue for people affected by the proposed removal of the 'Flaxman Croft Loop' section of the number 13 bus stop.	-	M
<b>Gender</b>	None	0	
<b>Gender Reassignment</b>	None	0	
<b>Marriage and civil partnership</b>	None	0	
<b>Pregnancy and maternity</b>	During pregnancy people would be particularly adversely impacted by having to travel longer distances to reach their nearest bus stop. In the context of these proposals, this is	-	M

	particularly an issue for people affected by the proposed removal of the 'Flaxman Croft Loop' section of the number 13 bus stop.		
<b>Race</b>	None	0	
<b>Religion and belief</b>	None	0	
<b>Sexual orientation</b>	None	0	
<b>Other Socio-economic groups including :</b>	<b>Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?</b>		
<b>Carer</b>	Carers without access to private transport would be particularly adversely impacted by having to travel longer distances to reach their nearest bus stop.	-	M
<b>Low income groups</b>	As a socio-economic group, people in lower income groups also have lower car ownership / lower access to private transport. They are therefore more reliant on public transport for all trip purposes. Without access to bus services at the hours people require to travel, they may be reliant on lifts or expensive taxis.	-	M
<b>Veterans, Armed Forces Community</b>	None	0	
<b>Other</b>	None	0	
<b>Impact on human rights:</b>			

List any human rights impacted.		0	
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**Use the following guidance to inform your responses:**

Indicate:

- Where you think that the proposal could have a POSITIVE impact on any of the equality groups like promoting equality and equal opportunities or improving relations within equality groups
- Where you think that the proposal could have a NEGATIVE impact on any of the equality groups, i.e. it could disadvantage them
- Where you think that this proposal has a NEUTRAL effect on any of the equality groups listed below i.e. it has no effect currently on equality groups.

It is important to remember that a proposal may be highly relevant to one aspect of equality and not relevant to another.

<p><b>High impact</b> (The proposal or process is very equality relevant)</p>	<p>There is significant potential for or evidence of adverse impact The proposal is institution wide or public facing The proposal has consequences for or affects significant numbers of people The proposal has the potential to make a significant contribution to promoting equality and the exercise of human rights.</p>
<p><b>Medium impact</b> (The proposal or process is somewhat equality relevant)</p>	<p>There is some evidence to suggest potential for or evidence of adverse impact The proposal is institution wide or across services, but mainly internal The proposal has consequences for or affects some people The proposal has the potential to make a contribution to promoting equality and the exercise of human rights</p>
<p><b>Low impact</b> (The proposal or process might be equality relevant)</p>	<p>There is little evidence to suggest that the proposal could result in adverse impact The proposal operates in a limited way The proposal has consequences for or affects few people The proposal may have the potential to contribute to promoting equality and the exercise of human rights</p>

## Step 5 - Mitigating adverse impacts and maximising positive impacts

5.1

**Based on your findings, explain ways you plan to mitigate any unlawful prohibited conduct or unwanted adverse impact. Where positive impacts have been identified, what is been done to optimise opportunities to advance equality or foster good relations?**

The feedback from the consultation has been reviewed by the council's Sustainable Transport team and will be used to inform the specification of the bus contracts that are advertised going forward. Where feasible, for each service we will ask operators to provide a price for two options: 1) retaining the current frequencies and operating hours (where applicable); and 2) the proposal that was consulted on. If affordable and where we think there may be realistic potential to increase patronage, we will seek to retain as many services as possible. This particularly applies to early morning and, to a lesser extent, late evening services.

The open text responses received through the consultation are to be shared with all bus operators so that they can consider how they can use these to improve the services they deliver.

Responses to the following survey question will be used to identify bus stop infrastructure improvements that could be implemented to help mitigate some of the bus accessibility issues raised, using DfT-awarded capital funding allocated for this specific purpose.

*“Are there any issues you would like to raise? Are there any bus stop improvements we could make, and where? For example, real time information, shelters, raised kerbs, lighting etc. Or would the proposals mean you would have to use unlit paths, or pavements and surfaces that are not even? (Please provide details)”*

As and when new contracts and service change dates are agreed, the Sustainable Transport team will ensure the changes are clearly communicated with plenty of notice to bus users, elected representatives and to other stakeholders, utilising all the council's communication channels. Plans will also be made to offer further in-person drop-in sessions to help people understand the changes and to help them with journey planning.

Separate to the proposed supported bus service changes, the council is exploring options to re-establish a Dial & Ride service for York, alongside providing ongoing support for the York Wheels Volunteer Car Scheme, which provides door-to-door transport for people who are unable to use traditional public transport. Such services may form part of the mitigation measures for those affected by the proposed removal of the 'Flaxman Croft Loop' section of the 13 service.

## Step 6 – Recommendations and conclusions of the assessment

6.1	<b>Having considered the potential or actual impacts you should be in a position to make an informed judgement on what should be done. In all cases, document your reasoning that justifies your decision. There are four main options you can take:</b>
<b>- No major change to the proposal</b> – the EIA demonstrates the proposal is robust. There is no potential for unlawful discrimination or adverse impact and you have taken all opportunities to advance equality and foster good relations, subject to continuing monitor and review.	

- **Adjust the proposal** – the EIA identifies potential problems or missed opportunities. This involves taking steps to remove any barriers, to better advance quality or to foster good relations.
- **Continue with the proposal** (despite the potential for adverse impact) – you should clearly set out the justifications for doing this and how you believe the decision is compatible with our obligations under the duty
- **Stop and remove the proposal** – if there are adverse effects that are not justified and cannot be mitigated, you should consider stopping the proposal altogether. If a proposal leads to unlawful discrimination it should be removed or changed.

**Important:** If there are any adverse impacts you cannot mitigate, please provide a compelling reason in the justification column.

<b>Option selected</b>	<b>Conclusions/justification</b>
No major change to the proposal	<p>It is recognised that proposed the changes and/or reductions to the operating hours, frequencies, and routes of some subsidised bus services will have an adverse impact on some people with protected characteristics.</p> <p>The proposed changes have been kept to an absolute minimum. The rationale for making these changes is to deliver stability to the wider bus network by using the savings made to offset rising costs on other subsidised bus services, which are better used and these too are important and relied upon by people with protected characteristics.</p>



## Step 7 – Summary of agreed actions resulting from the assessment

<b>7.1 What action, by whom, will be undertaken as a result of the impact assessment.</b>			
<b>Impact/issue</b>	<b>Action to be taken</b>	<b>Person responsible</b>	<b>Timescale</b>
Bus stop infrastructure	Review consultation feedback to identify opportunities to improve bus stop infrastructure to address accessibility issues and/or provide better bus stop information and waiting facilities	CYC's Richard Hampton (Bus Infrastructure lead)	Issues that can be addressed to be identified by end of March 2024 for phase delivery during 2024/25.
Bus driver behaviour and other bus operational issues	CYC Sustainable Transport team to share all open feedback received through the consultation with York bus operators	Danielle Hudson to email all open consultation feedback to bus operator representatives involved with the York Enhanced Partnership.  All bus operators to review feedback and address issues as required.	Feedback to be issued in February 2024.  Bus operators to take any necessary action at the earliest opportunity

Communication of bus service changes	CYC Sustainable Transport team to work with CYC Communications team and the York EP Marketing Group to ensure all bus service changes are well-communicated with plenty of notice, including offering in-person drop-in and journey planning sessions where changes are significant and/or where requested by councillors.	CYC's Sam Fryers to liaise with Lara Thornton	Throughout 2024, as and when service change plans are confirmed

## Step 8 - Monitor, review and improve

<p><b>8. 1</b></p>	<p><b>How will the impact of your proposal be monitored and improved upon going forward?</b>  Consider how will you identify the impact of activities on protected characteristics and other marginalised groups going forward? How will any learning and enhancements be capitalised on and embedded?</p>
	<p>The council will continue to monitor bus patronage data and feedback from bus users, bus operators, the York Enhanced Bus Partnership (EP), elected representatives and others.</p> <p>Through the York EP the council engages closely with a broad range of stakeholders representing people with different protected characteristics, particularly via the Bus Forum and Passenger Liaison Group.</p> <p>The council's Accessibility Officer is a member of the York EP Bus Forum and an Accessibility Task and Finish group is currently in the process of being established, with a specific focus on improving accessibility standards for bus stops.</p> <p>The CYC Sustainable Transport team will consider feedback from the consultation to identify measures for improving bus stop accessibility, bus stop waiting infrastructure and bus stop information and, where practical and affordable, deliver improvements utilising BSIP capital funding in 2024/25.</p>

	<p>Bus operators will review the feedback received during the consultation and take action on any areas where they can reasonably resolve issues raised.</p>
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