

Supporting Good Decisions

Integrated Impact Assessment (IIA)

| | |
|------------------------------------|-----------------------------|
| Title of Policy/ Proposal | Draft Transport Policy |
| IIA Date | 5 February 2025 |
| Facilitator | Kate Thornback |
| Lead officer | Isobel Nisbet |
| Sign off by Head of Service | Guy Whitehead/Isobel Nisbet |

The Transport Policy will be published here when approved. If you cannot find the policy, please contact the Lead Officer for the most recent draft.



Summary of the Impact Assessment

Note to reader: The impacts identified are a reflection of the experiences and knowledge within the room when the assessment was completed. Impacts outside of those identified may exist or arise over time.

Key Groups Impacted

Protected Characteristic Groups:

Disabled people that access transport support as part of their care package.

Sex - women (60% of carers are women).

Age – younger people transitioning from children to adult services.

Older people in their disproportionate role as carers.

Other groups: Carers.

Findings

- The group identified a number of potential positive impacts of the policy including:
 - Increased travel independence and confidence for services users.
 - Improved health and wellbeing through active travel.
 - The positive environmental impact of reducing carbon emissions through the resulting reduction of single occupant journeys.
 - Potential monetary savings that could eventuate in a redirection of funds to other key priorities.
- The group recognised the pressures on carers, levels of disadvantage experienced by this group, the disproportionate unpaid work of women as carers and the barriers they encounter to employment and social opportunities and potentially relevant points in discussing the indirect impacts of the policy.



- The group recognised that carers would appreciate and benefit from softer, clearer language use in versions of the policy communicated with them, or other communications intended to inform carers about the changes in policy criteria.
- The group identified potential positive impacts to younger people with disabilities in the policy eligibility as it encourages independent public transport use and active travel. This skill and the associated physical activity can contribute to a range of positive confidence and health outcomes for individuals and promote autonomy.
- The group identified some potential negative impacts to young people related to accessing education/resources that are further from home if not supporting by transport e.g. Additional Support Needs young adults accessing education opportunities outside of East Lothian.

Recommendations:

- Track a monitor a number of things to gauge impact over the first year of the policy implementation (see '*What actions will be taken? How we will monitor impact*').
- Reconsider policy wording for clarity, assumptions, sensitivity and the implication of a lack of nuance/case-by-case flexibility if that opportunity exists.
- Be mindful of the pressures on carers when producing any associated communications and word them in a way that reduces worries and fosters understanding. This could potentially be done by having an administrative version and public/service user version.
- Recognise the multiple benefits of equipping people that are able with the skills required to navigate public transport independently (travel training). This may include exploring the potential to direct funding towards training for transport independence or exploring other options available within East Lothian to gain these skills and signposting service users to them.
- Recognise some of the potential adjacent impacts of the policy on carers, drivers and escorts.

What actions will be taken:

| Actions | Responsible Person | Action due date | Review date |
|--|---|-------------------------|-----------------------------|
| Review the policy wording to improve clarity and sensitivity in the highlighted parts prior to publishing and communicating. | Christine Johnston | April/May 2025 | Feb 2026 |
| Ensure that versions or explanations that meet the communications needs of everyone that has interest in understanding or is impacted by this policy are met. The Service Lead will approach communications and equality focussed colleagues for assistance if needed. | Isobel Nisbet | From April 2025 onwards | Feb 2026 |
| Explore options that support learning the skills to navigate public transport independently (travel training). | Isobel Nisbet | September 2025 | September 2025 and Feb 2026 |
| The Equality and Engagement Lead will check progress on all actions via IIA review approximately 1 year from the date of this IIA | Kate Thornback, Equalities and Engagement Officer | Jan 2026 | Feb 2026 |

How we will monitor equality impacts:

The Service Lead will be responsible for:

- Keeping track of the versions of the policy produced
- Keeping track of requests for different versions or for an explanation of the policy and how the needs were met
- Comparing data from the year prior to the implemented policy changes with the year that follows in terms of single occupant journeys (if possible) to get a general idea of the carbon emission reductions.

The Equalities and Engagement Officer will check progress on all actions via IIA review approximately 1 year after the IIA is completed.

The IIA

1. What is this IIA about and what might/will change as a result of this proposal?

This impact assessment intends to assess the new draft Transport Policy. The purpose is to:

- Establish criteria for eligibility for funded transport from East Lothian Health & Social Care Partnership to apply across all areas of social care and social work.
- Align the policy with HSCP financial assessment processes and charging policy.

2. Briefly describe public involvement in this proposal (past, ongoing and planned).

Carers of East Lothian have contacted carers with feedback forms and these will be sent to HSCP.

3. Is the proposal considered strategic under the Fairer Scotland Duty?

No

4. Which impacts were identified and which groups will they affect? Please include suggested mitigations for negative impacts and actions to maximise positive impacts.

| Equality, Health and Wellbeing and Human Rights | Affected populations |
|--|--|
| Positive <u>Promotion of active travel types and the potential positive impacts to physical health, mental health and personal autonomy</u> – It was | People with a disability/disabilities. |

| Equality, Health and Wellbeing and Human Rights | Affected populations |
|---|---|
| <p>suggestion that the new policy could steer those that are able to consider active travel options that could improve their physical and mental health.</p> <p><u>Maximising positive impacts</u> – Ensure information about cycling and walking routes, schemes and community groups are signposted to service users and their carers.</p> <p><u>Promotion of independence, personal autonomy and independence those encouraging the use of public transport</u> – The skills for navigating public transport independently were recognised as contributing positively to the personal autonomy and life opportunities of services users over the course of their lives. This also supports the PSED of ‘fostering good relations between those who have protected characteristics and those that do not share them’.</p> <p><u>Maximising positive impacts</u> - Consider directing funding towards or exploring options for trainers in transport independence.</p> | <p>People experiencing health and income inequalities and disadvantage.</p> |
| <p>Negative</p> <p><u>The use of phrasing ‘won’t be provided’</u> – Clarity is needed on whether this is a binary requirement or flexible e.g. whether there is some case-by-case flexibility/opportunity to contest or escalate a decision.</p> <p><u>Mitigation</u> – Clarify whether the language is accurate (there is no flexibility) or whether there is some flexibility.</p> | <p>All.</p> |

| Socio-Economic | Affected populations |
|---|--|
| Positive | |
| <p>Negative</p> <p><u>Using Personal Income to Fund Transport</u> -The stated policy expectation that people should be ‘using personal funds to fund transport’ was identified as potentially communicating to service users and carers a lack of recognition of the range of things that people spend their funding packages on. The group discussed the underlying assumption of the statement and suggested this could benefit from being questioned. It was raised that this wording may not be compatible with PSED ‘fostering good relations between people who have a protected characteristic and those that do not share it’.</p> <p><u>Mitigation</u> – Public facing versions could ensure that language use communicates assumptions of ‘good faith’ and avoids wording that could be interpreted at punitive.</p> <p><u>Assumption that privately owned vehicles are only used/must be prioritised for service user transport</u> – The group raised the complexity of this assumption when applied to real family contexts. The group highlighted that this assumption had potential to affect people or families with lower incomes that need to balance work and caring responsibilities (sometimes of multiple people).</p> | <p>People on limited incomes, low or no income/wealth families and individuals.</p> <p>People with disabilities that would like to access transport as part of their care package.</p> |

| Socio-Economic | Affected populations |
|---|--|
| <p><u>Mitigation</u> – Review the phrasing and assumption of the section of the policy to see if this aspect can be better acknowledged or defined for clarity.</p> <p><u>People housed in temporary accommodation</u> – A potential impact was identified for people housed in temporary accommodation, given they may be less familiar with, or there may be fewer public transport options for them to use.</p> <p><u>Motability Lease Suitability Clause</u> – It was identified that the wording may cause anxiety/stress for carers and lead to then making themselves available at their own severe detriment.</p> <p><u>Mitigation</u> – Reconsider wording and seek clarity on the flexibility of this clause. It was also discussed that there was an opportunity to support group transport and collection points for service users going to the same service to reduce the costs and environmental impacts of single occupant journeys.</p> | <p>People in temporary or insecure housing arrangements. This group experience a range of other barriers to participation in civil life, so the impact should be considered as something that may contribute to an already complex situation.</p> <p>Carers.</p> |

5. Is any part of this policy/service to be carried out wholly or partly by contractors? If so, how will equality, human rights (including children's rights) be addressed?

N/A

6. **Consider how you will communicate information about this policy/service change to children and young people, those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a foreign language? Please provide a summary of how the changes will be communicated and to which groups.**

Professional leads will work with colleagues in communications and equality focusses roles to produce versions of the policy and supporting documents that suit the communication needs of everyone.

7. **Additional Information and Evidence Required?**

N/A

8. **Are there any negative impacts in section 4 (impacts) for which there are no identified mitigating actions?**

N/A

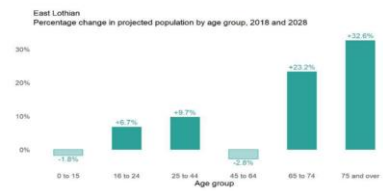
Appendix

Participants of the IIA


| Name/Role | Job Title |
|------------------------------|---|
| Isobel Nisbet (Lead Officer) | ELHSCP – General Manager, Adult Social Work |
| Kate Thornback (Facilitator) | ELHSCP – Equalities and Engagement Officer |
| Christine Johnston | ELHSCP - Service Manager, Strategic Planning and Commissioning (Adult Services) |
| Maria Burton | ELHSCP - Strategic Planning and Commissioning Officer, Carers |
| Shannon Leslie | ELHSCP - Service Manager, Learning Disability Services |
| Diana Murray | ELHSCP – Team Manager, Transport |
| Sarah Crichton | ELHSCP - Team Manager, Adult Services |

| Name/Role | Job Title |
|-------------------------|--|
| Jess Wade | Chief Executive - Carers of East Lothian |
| Jena Moffat (Notetaker) | Senior Business Support Assistant |

Evidence available at the time of the IIA

| Evidence | Available – detail source | What does the evidence tell you about different individuals and groups who may be affected by your proposal? | | | | | | | | | | | | | | |
|-----------------------------|---|---|-----------|-------------------|---------|-------|----------|-------|----------|-------|----------|-------|----------|--------|-------------|--------|
| Data on populations in need | East Lothian HSCP JSNA June 2023 East Lothian Council | <p>Our population is changing and people are living longer</p> <p>Population Over the next 10 years, population growth will rise in East Lothian, especially in the over 65 year age group. See Graph 1 below.</p>  <table><caption>East Lothian Percentage change in projected population by age group, 2018 and 2028</caption><thead><tr><th>Age group</th><th>Percentage change</th></tr></thead><tbody><tr><td>0 to 15</td><td>-1.8%</td></tr><tr><td>16 to 24</td><td>+6.7%</td></tr><tr><td>25 to 44</td><td>+8.7%</td></tr><tr><td>45 to 64</td><td>-2.8%</td></tr><tr><td>65 to 74</td><td>+23.2%</td></tr><tr><td>75 and over</td><td>+32.8%</td></tr></tbody></table> <p>From 2018 to 2043, East Lothian’s population is predicted to increase by a further 12.8% reaching a peak of 121,743 and will grow at faster rate than Scotland as a whole.</p> <p>Increases in the population and particularly in the ageing population will mean more informal care is needed.</p> | Age group | Percentage change | 0 to 15 | -1.8% | 16 to 24 | +6.7% | 25 to 44 | +8.7% | 45 to 64 | -2.8% | 65 to 74 | +23.2% | 75 and over | +32.8% |
| Age group | Percentage change | | | | | | | | | | | | | | | |
| 0 to 15 | -1.8% | | | | | | | | | | | | | | | |
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| 65 to 74 | +23.2% | | | | | | | | | | | | | | | |
| 75 and over | +32.8% | | | | | | | | | | | | | | | |

| Evidence | Available – detail source | What does the evidence tell you about different individuals and groups who may be affected by your proposal? |
|--|---|---|
| | | |
| Data on service uptake/access, if applicable | Data from Mosaic, ELC Transportation and ELHSCP finance | Gives us information about who is using commissioned transport, why, and the costs involved. It reveals that commissioned transport is being accessed by people who could use their own transport or subsidised public transport, absorbing resources that could be better used elsewhere. |
| Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation. | East Lothian HSCP JSNA June 2023 East Lothian Council | <ul style="list-style-type: none"> • Deprivation • East Lothian consists of 6 wards and 132 data zones, of which 8 data zones are in the 20% most deprived of Scotland. • People living in the most deprived areas are statistically more likely to experience health inequalities. This means lower life expectancy, higher rates of disease, more long-term illness • People living in the least deprived areas, have a life expectancy 8 years (males) and 4.8 years (females) higher than those in the most deprived areas. • Due to the effects of intersectionality and the impact of health inequalities, people in these areas are likely to have much greater pressures on limited finances. If they had to pay for transport, this might impact on their overall income for living expenses. |

| Evidence | Available – detail source | What does the evidence tell you about different individuals and groups who may be affected by your proposal? |
|------------------------------|---|---|
| Data on equality outcomes | Scottish Government Equality Evidence Finder | The Equality Evidence Finder brings together the latest statistics and research for Scotland across different themes for age, disability, ethnicity, gender, religion, sexual orientation, socio-economic status and transgender status. Although it cannot give us information at an East Lothian level, it does evidence the impacts of intersectionality and illustrates the additional needs of people in vulnerable groups. |
| Research/literature/evidence | <ul style="list-style-type: none"> East Lothian Council Children's Services Transport Policy East Lothian Council Education Transport Policy East Lothian Health and Social Care Partnership Draft Commissioned Transport Policy 2018  <p>7 2 Transport Policy - clean version.docx</p> | <p>Education and Children's Services have worked with Transportation at ELC to ensure that there are clear policies in place, that details when transport can be commissioned and who is eligible, which helps both staff and service-users to have a clear understanding.</p> <p>We also have to take account of the related legislation:</p> <ul style="list-style-type: none"> Health and social care integration (as set out in the Public Bodies (Joint Working) (Scotland) Act 2013, which led to the formation of integration joint boards and the integration of health and social care services in 2015 Social Care (Self-directed Support) (Scotland) Act 2013, which introduced a range of ways in which a person can direct/organise their support, including |

| Evidence | Available – detail source | What does the evidence tell you about different individuals and groups who may be affected by your proposal? |
|---|---|---|
| | | <p>the availability of personal budgets for social work services for service-users who wish to have greater personal control</p> <ul style="list-style-type: none"> • The Social Care and Social Work Improvement Scotland (Requirement for Care Services) Regulations 2011 • Social Work (Scotland) Act 1968 • Chronically Sick and Disabled Persons Act 1970 • Mental Health (Care and Treatment) (Scotland) Act 2003 |
| Public/patient/client experience information | <ul style="list-style-type: none"> • ELC Customer Service Feedback Report | Adult Services receives a relatively low number of complaints (8% out of all the complaints dealt with by ELC). It also regularly receives compliments for the care and support that it provides to service-users, carers and families. |
| Evidence of inclusive engagement of people who use the service and involvement findings | (Describe your engagement activities, which questions you asked and to whom. How did you try to include people with different communication needs and other physical requirements?) | Carers of East Lothian have carried this out on behalf of HSCP. Findings to be reported at IIA meeting |

| Evidence | Available – detail source | What does the evidence tell you about different individuals and groups who may be affected by your proposal? |
|---|--|--|
| Evidence of unmet need | None | N/A |
| Good practice guidelines | Scottish Government Best Value Guidelines 2020 | <p>The Commissioned Transport policy developed must be align with these Best Value themes:</p> <ul style="list-style-type: none"> • Vision and leadership • Governance and accountability • Effective use of resources • Partnerships and collaborative working • Working with communities • Sustainability • Fairness and equality. <p>The new policy will help us to deliver across these themes.</p> |
| Carbon emissions generated/reduced data | No data available | |
| Risk from cumulative impacts | No data available | |
| Other (please specify) | | |

