Equality Impact Assessment

Equality Impact Assessment (EIA) for Changing the Application Process for Travel Assistance to an Online Form

Did you use the EIA Screening Tool? (Delete as applicable)

Yes (please attach upon submission)/ No

1. Explaining the matter being assessed

Is this a:

(Delete the ones that don't apply)

- Change to an existing strategy or policy
- Change to a service or function
- A new strategy or policy
- A new service or function
- Other

Summarise the strategy, policy, service(s), or function(s) being assessed. Describe current status followed by any changes that stakeholders would experience.

As of September 2024, the Surrey School Travel & Assessment team provide travel assistance to 9,911 pupils within Surrey. The level of applications received into the service during 2023/24 reached a record 5,691 new applications.

We are planning to introduce a new public-facing application form, replacing the existing online application form that has been in-place since the spring of 2020. This change is intended to streamline the process of application for families by reducing unnecessary questions and by providing an provisional eligibility outcome, while improving accessibility with insights from families who we spoke with during the summer of 2023. An additional aim is to reduce officer time spent assessing applications through automation capabilities linked to providing outcomes earlier.

The scope covers all families applying for travel assistance, including those with children with special educational needs and disabilities (SEND), those from disadvantaged backgrounds, and others who may face barriers to accessing online services. The proposal includes communication strategies and alternative application methods for those unable to access or use the online platform including the continued use of paper-based methods.

By introducing this new entry point for applications the service aims to capitalise on the 85% eligibility rate for a SEND child aged Under 16 (based on the past 2 years).

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Use of data or evidence

During the spring and summer of 2023, we worked with colleagues in the Digital Discovery Team as part of a project to redesign the current application form. Part of the redesign involved user engagement with a number of families whose children are currently assigned travel assistance and thus, had used the existing form when applying for free travel.

As part of the new form design, we are using the testing to inform the design, understand families' needs, and tap into real customer quotations to ensure success and adoption of the new application process.

One document that we have focused on is the 'Barriers' and Themes' data piece which includes qualitative examples of challenges that families faced with the current form.

While the focus of the project was a new front-end Under 16 years application form, the user feedback will be used as part of our improvements to both accessibility of information and future plans to update the post-16 (16-25) application form.

Consultation and Insight

Our main H2ST general survey has been running for 2 years. In it, we ask questions relating to the current application process and its ease of use to families who have interacted with our service. In 2023, from 312 responders, around 54% of respondents found the current online application either fairly easy or easy.

The aim of the updated form is to build on these successes with increased early engagement regarding expectations, timescales and outcomes while improving the language and its accessibility, with an aim of improving families experience, particularly the 26% who found the experience either difficult or slightly difficult.

To develop the online eligibility checker, we undertook a benchmarking exercise and consulted with two local authorities who currently have a checker in-place: Buckinghamshire and Staffordshire. Both Councils have a front-end system whereby families can determine a provisional eligibility outcome before they submit an application, something which we are aiming to implement via the new online form.

How does your service proposal support the outcomes in [the Community Vision for Surrey 2030](#)?

Specify which of the ten Vision outcomes this work is linked to.

- Children and young people are safe and feel safe and confident

- Everyone benefits from education, skills and employment opportunities that help them succeed in life

- Everyone lives healthy, active and fulfilling lives, and makes good choices about their wellbeing

- Everyone gets the health and social care support and information they need at the right time and place

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- Residents live in clean, safe and green communities, where people and organisations embrace their environmental responsibilities

- Journeys across the county are easier, more predictable, and safer

- Well connected communities, with effective infrastructure, that grow sustainably

Are there any specific geographies in Surrey where this will make an impact?

(Delete the ones that don't apply)

- County-wide

Assessment team – A key principle for completing impact assessments is that they should not be done in isolation. Consultation with affected groups and stakeholders needs to be built in from the start, to enrich the assessment and develop relevant mitigation.

Detail here who you have involved with completing this EIA. For each include:

- Name - Deborah Smith / Chris McShee
- Organisation – Surrey County Council
- Role on the assessment team – Senior Project Manager / Stakeholder Liaison Manager

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2. Service Users / Residents

Who may be affected by this activity?

There are 9 protected characteristics (Equality Act 2010) to consider in your proposal. These are:

1. Age including younger and older people
2. Disability
3. Race including ethnic or national origins, colour or nationality

Though not included in the Equality Act 2010, Surrey County Council recognises that there are other vulnerable groups which significantly contribute to inequality across the county and therefore they should also be considered within EIAs. If relevant, you will need to include information on the following vulnerable groups (Please **refer to the EIA guidance** if you are unclear as to what this is).

- Members/Ex members of armed forces and relevant family members (in line with the Armed Forces Act 2021 and [Statutory Guidance on the Armed Forces Covenant Duty](#))
- Adult and young carers*
- Those experiencing digital exclusion*
- Those experiencing domestic abuse*
- Those with education/training (literacy) needs
- Those experiencing homelessness*
- Looked after children/Care leavers*
- Those living in rural/urban areas
- Those experiencing socioeconomic disadvantage*
- Out of work young people)*
- Adults with learning disabilities and/or autism*
- People with drug or alcohol use issues*
- People on probation
- People in prison
- Migrants, refugees, asylum seekers
- Sex workers
- Children with Special educational needs and disabilities*
- Adults with long term health conditions, disabilities (including SMI) and/or sensory impairment(s)*
- Older People in care homes*
- Gypsy, Roma and Traveller communities*

- Other (describe below)

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(*as identified in the Surrey COVID Community Impact Assessment and the Surrey Health and Well-being Strategy)

1.Age including younger and older people

Replicate this page for each of the protected characteristic or vulnerable groups that are within the scope of this EIA [delete this sentence before publishing].

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Younger parents or guardians (e.g., teenage or early twenties) may have less experience with formal administrative tasks or online processes. They might feel intimidated or lack the skills needed to navigate a new system, leading to delays or errors in application.

Older parents/guardians may not be as familiar or comfortable with digital platforms, especially if they have limited experience using computers, smartphones, or online forms.

In cases where children are cared for by grandparents or older relatives, these individuals may face similar challenges related to digital literacy, especially if they have not used online services extensively.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Ensure that the online form is designed with simplicity in mind, using clear and straightforward language. Avoid technical jargon and use prompts and tooltips to guide the user step-by-step. Incorporate visual aids or videos that show how to fill out the form, making it easier for people of all ages and digital literacy levels to understand.

Offering of a paper-based application option for those who cannot access or use the online system due to age-related barriers. This method could also be supplemented by telephone support for those who prefer verbal communication. Ensuring that the paper forms and phone support are equally promoted alongside the online system, so all age groups know these options are available.

Work with local libraries, community centres, or council offices to offer in-person support for completing the form. Staff could provide assistance to those who are unfamiliar with digital tools or the internet.

Schedule sessions specifically designed for older or younger parents/guardians who need extra help with digital tasks.

Utilise the Contact centre for a support line that users can call for help with the application process. This could be particularly useful for older individuals who may not be familiar with online support systems.

Ensuring the support staff are trained to help older adults or young, inexperienced parents by offering step-by-step guidance over the phone or scheduling appointments for in-person assistance.

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Implement targeted communication campaigns to ensure that younger and older guardians are made aware of the process and their options. This can include social media outreach for younger parents and printed leaflets for older generations.

Partnering with schools and local community groups that work with young or elderly parents/caregivers to ensure they are aware of the changes and have access to support. Schools could provide information sessions, and community groups could offer help navigating the system, especially in areas with low internet access or digital literacy.

Utilise the feedback loop to monitor how well different age groups are adapting to the new system. Gather data on user experience and address age-specific challenges in subsequent updates to the online platform.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

In the transition to an online application process for travel assistance, most age-related concerns can be mitigated through the strategies mentioned above. However, a few potential negative impacts may remain, even with mitigations in place:

Older caregivers or grandparents - although alternatives like paper applications and phone support can help, they might still cause a sense of exclusion or frustration for older caregivers who feel technology is overtaking their ability to engage independently with services.

Dependency on Others for Help - even with training and support programs, some individuals may never feel comfortable with online platforms, leading to long-term reliance on external help. This reliance is difficult to eliminate.

Potential for Lower Engagement in Certain Communities - while communication campaigns and support programs can encourage use of the system, shifting a core service to an online platform may still result in decreased participation from people who have low confidence in technology or lack access to it. Complete buy-in from all populations may never be fully achieved.

Delays in Response from Non-Digital Users - even with dedicated resources, the shift toward digital processes may lead to inadvertent delays or lesser prioritisation for non-digital submissions. Ensuring full equality of response times across both platforms could be difficult to maintain as the system evolves.

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2.Disability

Replicate this page for each of the protected characteristic or vulnerable groups that are within the scope of this EIA [delete this sentence before publishing].

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Accessibility of the online form, people with physical, sensory, or cognitive disabilities may face challenges accessing or navigating an online form. For example: Individuals with visual impairments may struggle with poorly designed web forms that lack compatibility with screen readers. People with mobility impairments may have difficulty using devices (e.g., using a mouse) if the website requires fine motor control. People with learning disabilities or cognitive impairments may struggle with complex forms or unclear instructions.

Complexity of Information, applicants with cognitive or learning disabilities might find it difficult to understand complex language, forms with too many steps, or unclear questions.

Some individuals with disabilities may take longer to fill out forms or understand certain sections, especially if the process involves timed elements or multiple forms in a sequence.

People with more severe disabilities might rely on caregivers to help them complete the online form, which could lead to issues of privacy or miscommunication.

Not everyone with a disability may have access to necessary assistive technologies (e.g., screen readers, speech-to-text software) or know how to use them effectively.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Accessible Website Design, alternative text for images, clear colour contrast between text and background, the ability to navigate the form via keyboard, not just mouse.

Use plain language that is easy to understand for everyone, avoiding technical jargon or overly complex instructions. Offer of audio and video instructions as an alternative to text, catering to those with cognitive or learning disabilities.

Avoid placing any time constraints on completing the form. Allow users to save progress and return later if needed, inclusion of an option for applicants to request assistance if they are struggling to complete the form due to disability.

Provide alternative application formats (e.g., paper forms, phone applications) for those unable to access or complete the online form. These formats should receive equal prioritisation in terms of processing time.

Provide training and guidance materials to assist people with disabilities or their caregivers in completing the form. This could include easy-to-follow online tutorials, phone support, and even in-person support in extreme cases. Create clear help guides on how to use screen readers or other assistive technologies when filling out the form.

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Ensure applicants with disabilities can easily access contact information for support, including phone numbers, email addresses, or chat support. Make sure that this information is prominently displayed throughout the application process.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

Individuals with disabilities may have limited access to the technology required to complete online applications. While providing alternative methods (like paper forms) can help, some individuals may still be at a disadvantage if they cannot access the required technology or support.

Not all individuals with disabilities possess the same level of digital literacy, which can create barriers when using online forms. While training and support can be provided, there will always be individuals who lack the skills or confidence to engage with digital platforms.

The shift to an online process may exacerbate anxiety or stress for some individuals, particularly those with cognitive impairments or mental health challenges. Although support can be offered, those who experience significant anxiety may still struggle, regardless of the assistance available.

The online process may require individuals to advocate for themselves more than they would in a traditional, in-person process. Providing support channels can help, but not all individuals may recognise when they need assistance or feel empowered to seek help.

Individuals from diverse backgrounds may find online applications difficult to navigate due to language or cultural differences. While offering multilingual support is beneficial, it may not fully address the nuances of cultural contexts or varying literacy levels.

Systemic inequalities related to disability and socioeconomic status may persist despite changes to the application process. Addressing these larger societal issues often requires interventions beyond the scope of the travel assistance application.

Individuals with disabilities may have heightened concerns about the privacy and security of their sensitive personal information when applying online. While security measures can be enhanced, the inherent risks associated with online data collection can never be completely eliminated.

3. Race including ethnic or national origins, colour or nationality

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Replicate this page for each of the protected characteristic or vulnerable groups that are within the scope of this EIA [delete this sentence before publishing].

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Certain racial or ethnic groups may have lower access to reliable internet or technology, impacting their ability to complete online applications. This may lead to underrepresentation of these groups in travel assistance applications.

Individuals from non-English speaking backgrounds may struggle to navigate an English-only application process. This can result in incomplete applications, misunderstandings, or even avoidance of the process altogether.

The design and content of the online application may not reflect cultural nuances relevant to diverse racial or ethnic groups. This may lead to feelings of alienation or misunderstanding, discouraging applications.

Historical experiences may lead to mistrust of government systems, especially among marginalised racial or ethnic groups. Individuals may be hesitant to engage with the online application process due to fears of discrimination or unfair treatment.

Some ethnic or national origin groups may not be aware of their rights or the assistance available to them. This lack of awareness can prevent eligible individuals from applying for travel assistance.

The absence of diverse voices in the development and evaluation of the online process may overlook specific community needs. This can lead to continued barriers and challenges for racial or ethnic minorities.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Provide alternative application methods, such as paper forms, phone applications, or in-person support, particularly in areas with low internet access.

Provide language support services, including interpreters, to assist non-English speakers during the application process.

Ensure that communication materials reflect cultural nuances and are respectful of diverse backgrounds.

Conduct outreach efforts to educate communities about travel assistance programs and encourage participation.

Utilisation of social media, community events, and local organizations to disseminate information about the application process.

Gather feedback to make necessary adjustments that enhance usability and inclusivity for all users.

Regularly review the data to adjust outreach efforts and application processes as needed to ensure equitable access.

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What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

Even with alternative application methods, certain communities may still face systemic barriers to access, such as economic disadvantages that limit internet or technology access. This could lead to significant disparities in the number of applications received from different racial or ethnic groups.

While offering multilingual support can help, individuals who are not proficient in any of the offered languages may still struggle. Those who are not comfortable in any available language may still find the application process daunting, leading to underrepresentation.

Cultural nuances can be difficult to convey through an online platform, potentially leading to misunderstandings or misinterpretations of the application. This could result in some applicants feeling disrespected or alienated, which may deter them from seeking assistance in the future.

Certain racial or ethnic groups may have historical reasons for distrust towards government institutions and processes, which an online application cannot address. This lack of trust can lead to reluctance or refusal to engage with the application process, even if it is accessible and well-designed.

Socioeconomic factors affecting various racial or ethnic groups may not be easily remedied through changes to the application process. Individuals from lower socioeconomic backgrounds may still face challenges in navigating online systems, regardless of the availability of support or resources.

Not everyone has the same level of digital literacy, which can vary significantly among different racial and ethnic groups. Some applicants may struggle with the online application interface, leading to frustration and potential abandonment of the application.

Broader societal issues related to racial inequality, such as discrimination in other areas (e.g., employment, housing), can create a cycle of disadvantage. These systemic issues can manifest in lower application rates for support services, making it difficult to achieve equity even with a more accessible application process.

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3. Staff

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Disability - Replicate this page for each of the protected characteristic or vulnerable groups that are within the scope of this EIA.

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Staff members with disabilities may experience challenges in using the new online system, especially if they have visual, cognitive, or motor impairments that make interacting with digital platforms more difficult. Accessibility features like screen readers, voice recognition, or keyboard navigation may be needed.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Ensure the system is fully compliant with accessibility standards, provide training and support for staff who may need assistive technology to use the system effectively. Make reasonable adjustments to their workstations or processes to ensure accessibility.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

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Age

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Older staff members may be less familiar with digital systems and online forms, potentially leading to challenges in adapting to the new process.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Offer targeted digital training sessions for staff who may not be as comfortable with online platforms. Provide additional time and support during the transition phase to ensure all staff can effectively use the new system.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

Race (including Ethnic or National Origins, Colour, or Nationality)

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

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Staff members for whom English is not their first language may experience difficulties with navigating or understanding the online system if it is only available in English.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

Offer translation assistance for key areas of the application process. Ensure that staff can access language support or resources to help them navigate the platform if necessary

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

Pregnancy and Maternity

Describe here the considerations and concerns in relation to the programme/policy for the selected group.

Staff who are on maternity leave or pregnant may require additional support if the system is rolled out while they are on leave or transitioning back to work.

Describe here suggested mitigations to inform the actions needed to reduce inequalities.

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Provide training and a clear communication plan to ensure staff on maternity leave are aware of the new system and feel supported when returning to work. Offer catch-up sessions or individual training for those returning from leave.

What other changes is the council planning/already in place that may affect the same groups of residents? Are there any dependencies decision makers need to be aware of?

If so, please detail your awareness of whether this will exacerbate impacts for those with protected characteristics and the mitigating actions that will be taken to limit the cumulative impacts of these changes.

Any negative impacts that cannot be mitigated?

Identify negative impacts that can't be mitigated and explain why, together with evidence.

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4. Recommendation

Based your assessment, please indicate which course of action you are recommending to decision makers. You should explain your recommendation below.

- **Outcome One: No major change to the policy/service/function required.** This EIA has not identified any potential for discrimination or negative impact, and all opportunities to promote equality have been undertaken
- <mark>**Outcome Two: Adjust the policy/service/function**</mark> to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
- **Outcome Three: Continue the policy/service/function** despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:
  - Sufficient plans to stop or minimise the negative impact
  - Mitigating actions for any remaining negative impacts plans to monitor the actual impact.
- **Outcome Four: Stop and rethink the policy** when the EIA shows actual or potential unlawful discrimination. (For guidance on what is unlawful discrimination, refer to the [Equality and Human Rights Commission's guidance and Codes of Practice on the Equality Act](#) concerning employment, goods and services and equal pay).

Recommended outcome:

Confirm which outcome you are recommending

<mark>**Outcome Two: Adjust the policy/service/function**</mark> **Explanation:**

Based on the Equality Impact Assessment (EIA), we believe the proposed adjustments will significantly reduce barriers for all protected characteristics. The mitigations, such as accessible website design, alternative application methods, language support, and training for staff and users, ensure that no group is disproportionately disadvantaged by the transition to an online application system.

5. Action plan and monitoring arrangements

Action plan and reviewing

The average work cycle for the travel and assessment team runs all calendar year, with a peak between February and November. If the form is introduced to families in January, leading up to increase in volume from mid-February, we would like to review its impact towards the end of the year in 2025, after a full cycle of use with an anticipated use-rate of around 5,000 applications submitted. We will develop an audit framework to be used during the review, and it will include questioning in the annual survey of 2025.

Involve the Assessment Team in monitoring progress against the actions above.

Item	Initiation Date	Action/Item	Person Actioning	Target Completion Date	Update/Notes	Open/ Closed
1	Autumn 2025	H2ST general survey	Chris McShee	Early December	Issue survey to users of the application form as part of our general survey	
2	Spring 2025	User testing	Chris McShee	Summer 2025	Engage with user testing participants on the updated version of the form	
3	Spring 2015	Website feedback mechanism	Chris McShee	All-year	Use the feedback mechanism online to review thoughts on the application process	

6a. Version control

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Version Number	Purpose/Change	Author	Date
1			

The above provides historical data about each update made to the Equality Impact Assessment.

Please include the name of the author, date and notes about changes made – so that you can refer to what changes have been made throughout this iterative process.

For further information, please see the EIA Guidance document on version control.

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6b. Approval

Secure approval from the appropriate level of management based on nature of issue and scale of change being assessed.

The level of EIA sign off will depend on who the change affects. Generally speaking, for strictly internal changes, Head of Service/ Exec Director sign off should suffice. For changes affecting residents, the Cabinet Member is required to approve completed EIAs.

Approved by	Date approved
Head of Service	29/10/24
Executive Director	
Cabinet Member	
Directorate Equality Group/ EDI Group (If Applicable) (arrangements will differ depending on your Directorate. Please enquire with your Head of Service or the CSP Team if unsure)	

Publish:
It is recommended that all EIAs are published on Surrey County Council's website.

Please send approved EIAs to: equalityimpactassessments@surreycc.gov.uk

EIA author: Debs Hunt

6c. EIA Team

Name	Job Title	Organisation	Team Role

If you would like this information in large print, Braille, on CD or in another language please contact us on:

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