

# Equality Impact Assessment (EIA) Form

## 1. Service Area/Directorate

Name of Head of Service for activity being assessed: Dr Dave Land

Directorate: Economy and Environment

Name of lead person for this activity: Dr Dave Land

Individual(s) completing this assessment: Dr Dave Land & Danielle Pyemont

Date assessment completed: 27 February 2026

## 2. What is being assessed

Activity being assessed (eg. policy, procedure, budget, service redesign, strategy etc.)

Implementation of a pilot programme for delivering school transport routes through the council's arms' length trading company, a TECKAL, Hoople. This will extend the existing school transport operating model to include an additional option for delivering transport. The purpose of the pilot is to test and review whether the council can provide transport at a lower cost than is currently achieved through the existing contracting model, while maintaining a high-quality service.

What is the aim, purpose, or intended outcome of this activity?

Herefordshire Council has a statutory duty to provide school transport which is defined by national legislation (primarily the Education Act 1996) which is to provide free, suitable home to school transport for eligible children based on distance, age, low-income eligibility, SEND, mobility issues, and circumstances where the nearest school cannot offer a place

To improve reliability, quality, safeguarding, and long-term sustainability of SEND transport we need to develop a new delivery model for some of statutory provision. To this end we will be testing and evaluating to see if an 'in-house' Teckal delivery model can improve reliability, safeguarding consistency and operational oversight.

We believe this new model will bring the following benefits:

- Reduce dependence on high-cost taxi provision and increase route efficiency.
- Strengthen the council's ability to influence and stabilise the local transport market.
- Ensure continuity and quality of provision for SEND and mainstream pupils while achieving better value for money.
- Increased service reliability, particularly for SEND pupils and families currently affected by driver shortages or failed routes.
- Build stronger relationships with schools and parents due to direct operational oversight.
- Deliver consistent standards across routes, supporting positive experiences for children and young people.
- Deliver improved safeguarding controls with directly trained staff
- Free up more taxis for other people to use to travel. There are often issues with visitors and locals alike struggling to find taxi provision in the city.

Herefordshire Council is facing significant and escalating financial pressures in its home to school transport budgets. Rising costs and an increase in demand is making the current operating model financially unsustainable. National pressures compound this locally: the number of Educational Health and Care Plans (EHCPs) has doubled in a decade, and the County Councils Network projects national transport costs rising to £3.6bn by 2030, heavily influenced by taxi usage.

Herefordshire Council are putting a variety of measures in place to better understand current and future demand in the county and, where possible, to reduce school transport costs where this can be done in a way which continues to meet pupils' needs and deliver the council's statutory duty.

Who will be affected by the development and implementation of this activity?

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> Service users                  | <input type="checkbox"/> Visitors to the county   |
| <input type="checkbox"/> Communities                               | <input checked="" type="checkbox"/> Carers  |
| <input checked="" type="checkbox"/> Children                       | <input checked="" type="checkbox"/> Patients  |
| <input type="checkbox"/> All staff                                 | <input type="checkbox"/> All part-time staff  |
| <input checked="" type="checkbox"/> Staff at a particular location | <input checked="" type="checkbox"/> Other: <b>Staff involved in transport delivery;</b> |

**Hoople employees**

Is this:

- Review of an existing activity/policy
- New activity/policy
- Planning to withdraw or reduce a service, activity or presence?

### 3. Background information and findings

What information and evidence have you reviewed to help inform this assessment? (name your sources, eg. demographic information, usage data, Census data, feedback, complaints, audits, research)

Detailed analysis shows that the current outsourced taxi-based model is high cost and opportunities to share transport are not always maximised. In 2025/26 the council is forecasting a spend of £15m on school transport, an increase of £2.3m from 2024/25. Around half of this is spent on taxis. Analysis of this spend and business modelling shows that for the more expensive contracts, an in-house model can bring down the costs significantly, in some cases by nearly 50%.

- Internal route cost analysis showing significant increases in taxi-based provision.
- Benchmarking with other councils using mixed delivery models.
- Complaints, reliability data, driver shortage trends, and SEND transport feedback.
- Early engagement with councillors, staff, SEND parent representatives, taxi association.

Summary of engagement or consultation undertaken (eg. who you've engaged with, and how, or why do you believe this is not required)

Discussions with internal SEND services, Hoople operational leads, councillors, and local operators indicate support for testing an alternative delivery model. Formal consultation is not required for operational changes that do not alter statutory entitlement.

Meetings with Parent Carer Voice (PCV) is scheduled 17 March 2026

Summary of relevant findings (it is possible that you will have gaps in your evidence. You must decide whether you need to fill in the gaps now, and if it is feasible to do so. It might be that collecting robust information forms part of your action plan below)

A pilot approach provides a controlled and proportionate way to assess feasibility, reduce high external market costs, and improve consistency without negatively affecting eligibility or service access. The pilot is limited in scope (10–50 routes) and structured to minimise disruption.

Need for consistency, better safeguarding, improved communication, cost efficiencies.

The pilot will be designed to:

- Test the feasibility and effectiveness of operating a portion of the school transport service internally.
- Provide greater operational control over routes, driver standards, safeguarding practice, and customer service.

- Reduce dependency on external market availability, particularly in areas where capacity is limited.
- Evaluate financial implications, including whether an inhouse model can provide better cost stability and reduce long-term contract inflation.
- Generate evidence to support future decision making regarding the broader operating model for school transport.

The pilot will run for 12 to 24 months, starting with 10 routes and developing into up to 50 routes to test the model and the potential rate of expansion.

#### 4. The Public Sector Equality Duty

Will this activity have a positive, neutral or negative impact on our duty to:

Equality Duty	Positive	Neutral	Negative
Eliminate unlawful discrimination, harassment, victimisation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Advance equality of opportunity between different groups?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Foster good relations between different groups?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explain your rationale here, and include any ways in which you could strengthen the capacity of this activity to promote equality (remember to add anything relevant into your action planning below)

The implementation of a pilot programme for delivering school transport routes is expected to have a positive impact across all three elements of the Public Sector Equality Duty because it directly addresses barriers that disproportionately affect children and young people with Special Educational Needs and Disabilities (SEND), as well as their families.

*Eliminate discrimination:* Neutral – the statutory offer remains unchanged.

*Advance equality of opportunity:* Positive – improved reliability particularly benefits SEND pupils dependent on consistent and specialist transport.

*Foster good relations:* Positive – more predictable and better-managed operations support improved trust with families.

#### 5. The impact of this activity

Consider the potential impact of this activity on each of the equality groups outlined below and explain your rationale. Please note it is possible for the potential impact to be both positive and negative within the same equality group. Remember to consider the impact on staff and service users (current and potential) and partner organisations. It may be useful to include data within these sections if you know the diversity make-up of the people likely to be affected.

Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Rationale
<b>Age</b> (include safeguarding, consent and child welfare)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Children benefit from improved reliability and stronger safeguarding arrangements.
<b>Disability</b> (consider attitudinal, physical, financial and social barriers, neuro-diversity, learning disability, physical and sensory impairment)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	SEND pupils are expected to see the greatest benefit due to more predictable provision and directly trained staff.
<b>Gender Reassignment</b> (include gender identity, and consider privacy of data and harassment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No differential impact: service provided equitably.
<b>Marriage &amp; Civil Partnerships</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Equality Group	Potential positive impact	Potential neutral impact	Potential negative impact	Rationale
<b>Pregnancy &amp; Maternity</b> (consider working arrangements, part-time working, infant caring responsibilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Minor positive impact for parents due to reduced last-minute route failures.
<b>Race</b> (including Travelling Communities and people of other nationalities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No barriers introduced; eligibility and access unchanged.
<b>Religion &amp; Belief</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No impact on access to schools with particular faith backgrounds.
<b>Sex</b> (consider issues of safety, sexual violence, part-time work, and single-sex provision – especially in light of the legal definition of “sex”)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	No gender-based differences in provision.
<b>Sexual Orientation</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<b>Others: carers, care leavers, homeless, social/economic deprivation</b> (consider shift-patterns, caring responsibilities)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	More consistent service reduces stress, childcare disruption, and reliance on expensive alternatives.
<b>Health Inequalities</b> (any preventable, unfair & unjust differences in health status between groups, populations or individuals that arise from unequal distribution of social, environmental & economic conditions)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Improved stability supports those with complex needs who rely on predictable routines.

Where a negative impact on any of the equality groups is realised after the implementation of the activity, the activity lead will seek to minimise the impact and carry out a full review of this EIA.

## 6. Action planning

What actions will you take as a result of this impact assessment? (you will need to include actions to mitigate any potential negative impacts)

Potential negative impact	What action will be taken	Who will lead	Timeframe
Transition risks	Phased rollout to minimise disruption	Hoople	Whole time period
Anxiety	Pre-introduction contact and training/onboarding for pupils on pilot routes	SEN team	Before launch
Training gaps	Mandatory training for Hoople drivers and PAs	Hoople	Before launch
Lack of knowledge	Monitor performance closely	Transport Team	Ongoing

## 7. Monitoring and review

How will you monitor these actions?

Monitoring will include monthly performance reports, safeguarding logs, complaints, and operator feedback. Review after 12 months, with annual review thereafter.

When will you review this EIA?

The EIA will be reviewed regularly throughout the implementation process and following feedback from groups, councillors.

## 8. Equality Statement

- All public bodies have a statutory duty under the Equality Act 2010 to give due regard to how they can improve society and promote equality in every aspect of their day-to-day business. This means that they must consider, and keep reviewing, how they are promoting equality in decision-making, policies, services, procurement, staff recruitment and management.
- Herefordshire Council will challenge discrimination, promote equality, respect human rights, and design and implement services, policies and measures that meet the diverse needs of our population, ensuring that none are placed at a disadvantage over others.
- The pilot does not alter eligibility or entitlement and is designed to maintain or improve service quality for all users while supporting long-term sustainability of the statutory transport duty

Signature of person completing EIA

Dr David Land

Date signed

27/02/2026